

## Arun District Council

### 5 Year Housing Land Supply 2015-2020

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1. The Arun Local Plan Inspector has requested an update of the 5 year housing land supply (HLS) assessment for Arun District for the period 2015-20. The Housing Implementation Strategy [PELVP01] (a Local Plan submission document) includes a full copy of the HLS assessment for the District for the period 2014-19 which explains the policy context and broad background to the HLS, and this still applies. This report provides the update as requested by the Inspector and broadly explains the methodology. It also provides caveats about the shortcomings of the assessment being provided in advance of the West Sussex County Council's annual survey of completions and projected completions (on which the HLS is normally based), which will not be available until early September.
2. It should be noted that the assessment does not include any increase in supply arising from additional allocated site being considered by the Council in the forthcoming months. As this work is yet to be completed it is not possible to forecast likely supply from these elements.

#### Housing Supply

3. In West Sussex, District and Borough Councils assess 5 - year HLS based on an annual survey by WSCC of all sites with planning permission of 6 dwellings or more (in terms of commencement, completion, and projected completions). The County Council then rolls the base data forward by a year and provides the District/Borough Councils with data on completions for the previous year and projected completions for the succeeding 5 years. The cycle for this commences in April, and the County Council surveys all sites in the County during the period April to June. During the period July to August they process the data and provide an early draft of the data in August for comment/corroboration, with a final set of data provided in early September.
4. Therefore, to meet the inspector's request for an updated assessment for the period 2015 - 20, it has been necessary for the District Council to roll forward the 2014 - 19 HLS data base in the absence of the WSCC survey.
5. Sites gained planning permission during the year (and therefore not included in the 2014 - 19 WSCC data base) have been included with reasonable assumptions being made about projected completions over the 5 year period. Completions for the period 2014 - 15 have been derived from the District Councils planning database (Ocella) – relying on Building Control notices (not wholly reliable for all sites as not all sites use the Council's Building Control service). There are therefore discrepancies between the assumed 2014-15 completions and the projected completions during 2015-20 in this assessment and the outcome of the WSCC survey. In fact, preliminary assessments from WSCC (received on 15/6/15) suggest gross completions of 646 dwellings (including SDNP) and 633 dwellings (excluding SDNP) – compared to the Ocella estimates of 386 and 381 dwellings (gross) respectively - a considerable

discrepancy which suggests considerable uncertainty for this updated assessment.

6. A further weakness in this assessment is that the assumption has had to be made that the projected completion rates arising from last year's WSCC survey still applies for the period 2015-2020. In practice, the rolled forward projection will differ, as sites which were 'under-completed' in 2014-15 are likely to carry the balance of completions over to 2015-16, with a consequent knock-on effect on the projections for 2015-20. Furthermore, completions (from Ocella) for 2014-15 were significantly less than projected - 611 net completions projected compared to 359 net completions recorded (a difference of 252 dwellings). Whereas the WSCC survey will roll forward sites where completions were lower than projected, so preserving the balance of completions for the supply. In this assessment the supply for 2014-15 is included in the completions, and so the balance of projected supply is lost to the 5 year HLS. As a worked example, if the 2014 WSCC survey projected completions as follows:

2014-15	2015-16	2016-17
100	50	50

but there were only 50 completions in 2014-15, the balance of 50 projected for 2014-15 is likely to be carried over to 2015-16, so the 2015 WSCC projection would be:

2015-16	2016-17
(50 +50) =100	50

Whereas the assumptions in this assessment carry over the WSCC 2014 survey because site specific completions are not known in every instance i.e. the projected completions would be:

2015-16	2016-17
50	50

7. In this example, this would lose 50 dwellings from the supply. A specific example of this is 'Jenkins Yard' (Littlehampton and area), which has a capacity of 39 dwellings, all of which were projected to be completed in 2014-15. In fact, officers are aware that 36 dwellings were completed on this site. However, in the absence of formal data to confirm current and projected completions, the data, as shown in Appendix A, are zero across the fifteen year period. This factor therefore potentially loses of the order of 252 dwellings from the supply. A commentary is provided on this point in the conclusions to this assessment at paragraphs 13 and 14 below.
8. A similar factor applies to the projected completions from small sites, again because of the absence of an update from the County Council and the reliance on last year's projections, so these are also likely to be underestimated.

Projected completions on large sites with planning permission:

9. For the purposes of this assessment 'large' sites are taken to be sites of 10 dwellings or more. The assessment includes all sites of 10 dwellings or more (gross) with planning permission as of 31/3/15.

Projected completions on HELAA and Neighbourhood Plan (NP) sites:

10. Arun DC commissioned a comprehensive Strategic Housing Land Availability Assessment (SHAA) in 2009, and this was comprehensively updated in 2012. This assessment identified a range of sites across the District and assessed their general suitability and availability as potential housing sites. The study identified sites with planning permission, sites with development potential inside settlements, sites with development potential outside settlements and sites with no development potential. For the purpose of this HLS assessment, sites of 10 or more dwellings, as identified in the 2012 study, were considered for inclusion. Some new SHLAA sites have also been considered, and included if assessed to be developable and deliverable. Setting a site threshold of ten dwellings results in a relatively small number of potential SHLAA sites being considered. Sites have been included in the HLS assessment if, based on the assessment in 2012 or a current assessment, and the current and projected demand in the housing market, it is reasonable to expect them to come forward as projected. The SHLAA has now been incorporated into the Housing and Economic Land Availability Assessment (HELAA).
11. Sites included in Neighbourhood Plans that have either been adopted, or passed examination are also included. All such sites have been assessed as to deliverability. Details of all such HELAA and NP sites and projected completion periods are set out in Appendix A, which also includes a commentary on each site.

Projected completions on small windfall sites

12. The District Council Ocella database identified 74 completions on small sites during 2014 - 15. It is not readily possible to identify which of these involves garden land (this information is normally derived from the WSCC database), so an average was taken of the proportion of small site completions not on garden land back to 2003, namely 77%, and this was applied, resulting in an assumed 57 completions on small sites not on garden land for 2014-15. This was added to the series of completions on small sites not on garden land back to 2003 resulting in an average of 88 dpa which is the assumed annual windfall allowance (see Appendix C).

Requirement and buffer

13. The Inspector has requested an assessment based on a requirement of 641 dpa and a buffer of 20%. In this assessment the shortfall at the beginning of the period is both made up during the period and included in the buffer.

Housing Land Supply Assessment

14. The following tables build up the housing land supply assessment from the various data sources outlined above and set out in the appendices to this report:

**Table 1: Housing requirement for the period 1/4/15 – 31/3/20**

		Dwellings
A	Net dwellings required 2011-2015 (641x4)	<b>2564</b>
A1	Net completions 2011-2015	<b>1925</b>
A2	Under-supply 2011-2015 (A-A1)	<b>639</b>
B	Net dwellings required 2015-2020 (641x5)	<b>3205</b>
B1	Net dwellings required 2015-2020 plus under supply (B+A2)	<b>3844</b>
C	Net dwellings required plus 20% (B1 x1.2)	<b>4613</b>

**Table 2: Deliverable Housing Land Supply 1/4/15 – 31/3/20**

		Dwellings
A	Large (10+) sites with planning permission at 30/6/14, projected completions (gross) 2015-20 – appendix A	<b>2323</b>
B	Large (10+) sites with planning permission at 30/6/14, projected completions (losses) 2015-20 – appendix A	<b>20</b>
C	Large (10+) SHLAA sites - projected completions (gross) 2015-20 – appendix A	<b>519</b>
D	Large (10+) SHLAA sites - projected completions (losses) 2015-20 – appendix A	<b>7</b>
E	Small (9-) sites – total dwellings with pp at 31/3/14 – projected completions 2015-20 appendix C table C2	<b>255</b>
F	Small (9-) sites – total dwellings with pp at 31/3/14 – projected losses 2015-20 appendix C table C2	<b>23</b>
G	Small (9-) site windfall allowance – appendix C table C2	<b>301</b>
H	<b>Total supply (A-B+C-D+E+F)</b>	<b>3349</b>

**Table 3: Five Year Housing Land Supply vs requirement 1/4/15 – 31/3/20**

		Dwellings
A	Total deliverable Housing Supply (Table 2 row G)	<b>3349</b>
B	Five Year Housing Requirement plus shortfall plus 20% buffer (1 April 2015 to 31 March 2020) (table 1 row C)	<b>4613</b>
C	Annual requirement for HLS period (B/5)	<b>922.56</b>
D	No of years deliverable supply including 20% (A/C)	<b>3.63</b>

### Conclusions

15. Paragraphs 2 to 6 above identify significant shortcomings in this assessment, and they should be taken into account in the reliance paid on the conclusions. With this in mind, the assessment shows that in conventional terms, with a requirement of 641 dwellings per annum, and a 20% buffer, there is a supply of 3.63 years. An estimate to correct for potential under supply due to the method of rolling forward the data, possibly also reflecting the discrepancy between the Ocella completions and the WSCC preliminary completions would increase the supply to 3.87 years
16. It should be noted, however, that with a requirement of 641 dwellings, the requirement was met in 2 of the previous eight years (see table B1). For a requirement of 641 dpa, a case could be made for a 5% buffer. In conventional terms applying this buffer would result in a supply of 4.15 years. An estimate to correct for the initial completion findings from WSCC would increase this to 4.43 years.
17. It should also be noted that any increase in supply agreed by the Council as part of the review currently under consideration would need to be added to the assessment, and some such sites will be deliverable in the period 2015-20.

**Appendix A – large site data (source WSCC 2014 RLA)****Littlehampton and area**

<b>SiteAddress</b>	<b>Years 1-5</b>	<b>Years 6-10</b>	<b>Years 10-15</b>	<b>PANumber</b>	<b>LapseDate</b>
<b>Sites with PP at 30/6/14</b>					
Malvern & Kerria Station Road East Preston	5	0	0	EP013512	
Jenkins Yard Glenbarrie Way Ferring	0	0	0	FG002310	
Main A259 Road Ferring	40	0	0	FG010811	
Parklands Worthing Road Rustington	1	0	0	R005099	
Policy Site 7 Toddington (Windroos Nursery ) Littlehampton	91	0	0	LU022910	28/09/16
Toddington Nursery Littlehampton (Hollyacre Phase 2)	477	600	246	LU011613	
3 River Road Littlehampton	12	0	0	LU023408	
Littlehampton Covered Market Surrey Street Littlehampton	0	0	0	LU051704	
Courtwick Lane Littlehampton	351	140	0	LU024813	
<b>Totals</b>	<b>977</b>	<b>740</b>	<b>246</b>		
Losses	9	0	0		
<b>Net totals</b>	<b>968</b>	<b>740</b>	<b>246</b>		
<b>SHLAA/NP sites</b>					
Clock House & area Broadmark Lane/Vernon Close Rustington	0	10	0		
S/O Cornfield Close Littlehampton	65	53	0		
Land s/o Littlehampton Academy	68	0	0		
Land at Toddington Farm	12	0	0		
Patterson Wilson Rd - NP site	15	0	0		
Fizalan Rd/Church St - NP site	0	15	0		
Toddington 'island' site	0	50	150		
Land Rear of Henty Arms, Ferring Lane - Ferring NP	14	0	0		
Ferring Village Hall, Ferring Street- Ferring NP	10	0	0		
Land at Ferringham Lane- Ferring NP	0	25	0		

The Rustington Convalescent Home (Carpenters), Sea Road - Rustington NP	0	30	0		
<b>Total (gross) SHLAA/NP sites</b>	<b>184</b>	<b>183</b>	<b>150</b>		
Losses	7	10	0		
<b>Net SHLAA/NP sites</b>	<b>177</b>	<b>173</b>	<b>150</b>		

**Bognor Regis and Area**

SiteAddress	Years 1-5	Years 6-10	Years 11-15	PAnumber	LapseDate
<b>Sites with PP at 31/3/15</b>					
Richmond Lodge Shripney Road Bognor Regis	10	0	0	BE008810	
Bersted Phase NWS Policy Site 6	191	60	0	Various	
The Family Tree 1 Laburnum Grove Bognor Regis	0	0	0	BR009612	
Site 6	237	0	0	FP025107	
Belmont Lodge Belmont Street Bognor Regis	13	0	0	BR/149/14/OUT	22/01/18
Glenlogie and Wee Glenlogie Clarence Road Bognor Regis	2	0	0	BR014811	
21-23 Sturges Road Bognor Regis	12	0	0	BR031610	
St Michaels and All Angels Church Queens Field East West Mead Bognor Regis	0	0	0	AW029510	
Bognor Regis Community College Westloats Lane Bognor Regis	0	0	0	BR/014212	
55 & 57 Victoria Drive Bognor Regis	13	0	0	BR038907	
Summerley Corner (south side) Limmer Lane Felpham	0	0	0	FP018909	
The Beach The Esplanade Bognor Regis	8	0	0	BR023911	03/06/16
The Beach The Esplanade Bognor Regis	2	0	0	BR023911	03/06/16
1st & 2nd floors, Queensway House	0	0	0	BR014012	

Queensway Bognor Regis					
Land R/O 27 North Bersted Street Bognor Regis	25	0			
<b>Totals</b>	<b>513</b>	<b>60</b>	<b>0</b>		
Losses	3	0	0		
<b>Net totals</b>	<b>510</b>	<b>60</b>	<b>0</b>		
<b>SHLAA/NP sites</b>					
Covers Richmond Road Bognor Regis	40	70	0		
Regis Centre site The Esplanade Bognor Regis	40	40	0		
Hothampton car park The Queensway Bognor Regis	25	75	0		
Bartons County Infant School, North Bersted - Bersted NP	20	0	0		
<b>Total (gross) SHLAA/NP sites</b>	<b>125</b>	<b>185</b>	<b>0</b>		
Losses			0		
<b>Net SHLAA/NP sites</b>	<b>125</b>	<b>185</b>	<b>0</b>		

#### Arundel and villages

SiteAddress	Years 1-5	Years 6-10	Years 11-15	PANumber	LapseDate
<b>Sites with PP at 31/3/15</b>					
Pollards Nursery Lake Lane Barnham	100	7	0	BR001612	17/10/16
Land north of Yapton Road & east of Garden Crescent Barnham	44	0	0	BN000712	
Land east of Goodacres Barnham	75	0	0	BN001511	
Angels & Hyde Nurseries Yapton Road Barnham	86	0	0	BN002913	
Former Brooks Nursery Eastergate	16	0	0	EG002913	
Land to the rear of 43 45 & 47 Barnham Road Barnham	11	0	0	EG004412	
Land south of Fellows Gardens Yapton	34	0	0	Y003013	
Land to west of Kings Close Yapton	12	0	0	Y005911	
Land north of Burndell Road Yapton	153	0	0	Y008110	
The Lamb Inn Bilsham Road Yapton	14	0	0	Y4811	
Land E of Roundstone Lane	138	0	0	A8212	
West End Nursery, Angmering (subect to s106)	150	45	0	A12212	



Manor Nursery, Angmering (subject to s106)	32	0	0	A13512	
Pound Nursery, Roundstone Lane(subject to s106)	36	0	0	A5114	
Land at former Eastergate Fruit Farm Eastergate	60	0	0	EG/71/14/OUT	03/02/20
Land west of Westergate Street East of Hook Lane Westergate	79	0	0	AL/39/13/	23/02/20
Land at Nyton Road and Northfields Lane and Land off of Fontwell Avenue Aldingbourne	180	88	0	AL/61/13/	23/02/20
<b>Totals</b>	<b>833</b>	<b>52</b>	<b>0</b>		
Losses	8	0	0		
<b>Net totals</b>	<b>825</b>	<b>52</b>	<b>0</b>		
<b>SHLAA/NP sites</b>					
Sub station Ford Road Arundel	0	37	0		
Eastergate NP site n/o Barnham, Rd	0	40	0		
Arundel NP site River Rd	13	0	0		
Arundel NP site - land at Fitzalan Rd	0	24	0		
Land north of Yapton CE Primary School - Yapton NP	35	0	0		
Cinders Lane - Yapton NP	60	0	0		
Bramley Green South (Mayflower Way) - Angmering NP	66	0	0		
Field in Mayflower Way - Angmering NP	16	0	0		
Chandlers site - Angmering NP	20	0	0		
<b>Total (gross) SHLAA/NP sites</b>	<b>210</b>	<b>101</b>	<b>0</b>		
Losses	0	1	0		
<b>Net SHLAA/NP sites</b>	<b>210</b>	<b>100</b>	<b>0</b>		

## HELAA and NP site comments (sites with projected completion by 2020 only)

SiteAddress	Comments
Land s/o Littlehampton Academy	68 dwellings assumed by April 2020. Part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan which is now 'made'. A planning application for 68 dwellings is in negotiation, so there are strong grounds for assuming this will proceed to be permitted, and that it will be completed by April 2019.
S/O Cornfield Close, Littlehampton	65 dwellings of a total of 118 assumed by April 2019. This is part of a surplus WSCC education site that is being promoted for development by WSCC, and is included as a housing site in the Littlehampton Neighbourhood Plan. 30 of the dwellings in the East of the site are not infrastructure dependant, whereas the remaining 88 depend on the Fitzalan Link Rd, so are assumed to commence to deliver 35 by 2015.
Arundel NP site River Rd Arundel	This site is included in the Arundel Neighbourhood Plan that has been adopted following a referendum. The plan provides for the site to come forward by 2019. This is a small site in an area where sites are in demand, and there is little reason to suggest the site will not be completed by 2019.
Land at Toddington Farm	This is within the Local Plan allocation for Toddington. A recent HELAAA submission refers to a capacity of 12 dwellings and an intention to submit an application in the near future. This is a small site with no infrastructure constraints, and should pose no difficulties in being delivered by 2020.
Covers Richmond Road Bognor Regis	This site is part of Bognor Regis regeneration program, actively supported by the council and now included in the neighbourhood plan. Total site capacity is c110 dwellings of which it is assumed 40 can be delivered by April 2020.
Regis Centre site The Esplanade Bognor Regis	This site is part of Bognor Regis regeneration program, actively supported by the Council and now included in the Neighbourhood Plan (at consultation stage). Total site capacity is c80 dwellings of which it is assumed 40 can be delivered by April 2020.

Hothampton car park The Queensway Bognor Regis	This site is part of Bognor Regis regeneration program, actively supported by the council and now included in the neighbourhood plan. Total site capacity is c100 dwellings of which it is assumed 25 can be delivered by April 2020.
Bartons County Infant school, North Bersted – NP site	This is a redundant WSCC school site within the built up area. The school has relocated, and the site has been identified in the Bersted Neighbourhood Plan which is now 'made'. WSCC have made pre-application enquiries about development of 25 dwellings. 20 dwellings are provided for by 2019
Land Rear of Henty Arms, Ferring Lane - Ferring NP	This site is identified in the Ferring NP (passed examination on 12/8/14) for development in the period to 2019. It is being promoted by the PC through a community RTB order to fund community facilities in the village. This is an area of high demand, and there is no reason to suggest this will not come forward within the HLS period
Ferring Village Hall, Ferring Street- Ferring NP	This site of the Village Hall is identified in the Ferring NP to provide new housing to meet local demand and to realise full development value to re-invest in the provision of the replacement Ferring Community Centre. Its development is being actively promoted by the PC through a community RTB order .
Land north of Yapton CE Primary School - Yapton NP	This is an open field in an area of significant demand with no development constraints identified for development in the Yapton NP (now made).
Cinders Lane - Yapton NP	This is a former horticultural site in an area of significant demand identified for development in the Yapton NP for 60 dwellings. The site is projected to provide 60 dwellings by April 2020.
Bramley Green South (Mayflower Way) - Angmering NP	Identified in the Angmering NP (now passed its examination) for 66 dwellings. The site comprises a derelict nursery, waste ground, scrubland and a disused cement works. Part of the site has provisional plans in the pipeline, so it is projected that 66 dwellings will be delivered by April 2020.
Field in Mayflower Way - Angmering NP	This field is owned by the Parish Council, and is assumed to deliver 16 affordable dwellings in the HLS period.
Chandlers site - Angmering NP	Chandlers is a BMW franchise located in the village centre. They are re-locating to a new larger purpose built site within the Parish, with a proposed increase in the number of jobs. The building of their new site has already commenced and is scheduled to be completed by the end of this year (2014). This site is therefore projected to deliver 20 dwellings within the HLS period.

Table A1 – Large site housing supply 2015-20 aggregate totals (as included in HLS tables 1-3)

	Large sites with PP			SHLAA/NP sites		
	Gross	Losses	Net	Gross	Losses	Net
Littlehampton	977	9	968	184	7	177
Bognor Regis	513	3	510	125	0	125
Arundel Villages	833	8	825	210	0	210
Totals	2323	20	2303	519	7	512

**Appendix B – Completions**

Table B1 - Housing completions and requirements Arun District (including SDNP area) 2007-2015 (source WSCC RLA/Ocella)

	Gross	Net	SE Plan requirement	Local Plan requirement
2006-7	364	318	565	
-2008	637	591	565	
-2009	587	548	565	
-2010	448	416	565	
-2011	570	519	565	
-2012	748	722	565	641
-2013	499	483	565	641
-2014	397	367		641
-215	386	365		641

Completions		2011/12	2012/13	2013/14	2014/15	<b>2011/13</b>
Including SDNP Sites	Total Gross	749	503	397	386	<b>2035</b>
	Total Net	723	487	367	365	<b>1942</b>
Excluding SDNP Sites	Total Gross	746	495	366	381	<b>1988</b>
	Total Net	724	479	359	363	<b>1925</b>

Table B2 – Housing completions 2011-15 including/excluding SDNP

**Appendix C – Small site data and calculations**

Table C1– Small site windfall Arun LPA area 2003-2015 (source WSCC RLA)  
Net completions from sites of 9 dwellings or less excluding SDNP

Excluding gardens	2003 /4	2004 /5	2005 /6	2006 /7	2007 /8	2008 /9	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014 /15	Average
Small Sites Net	92	147	77	74	69	123	82	98	90	65	83	57	88

Table C2 – Small site commitments and windfall balance 2014-2020 (source WSCC RLA) (excluding SDNP and sites on garden land)

Small site calculator /9 site threshold based on above proportions (excluding SDNP)

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Total 2015-20 (rounded)
ICE	146	73	43.8	29.2	0	0	146
Full	201	30.15	30.15	20.1	10.05	0	90
Outline	42	0	8.4	4.2	4.2	2.1	19
Total	389	131	82.35	53.5	14.25	2.1	255
Losses	30	30.00	7.26	4.71	1.26	0.19	23
Net	33	33.00	75.09	48.79	12.99	1.91	233
Windfall balance		0	12.91	39.21	75.01	86.09	301

Windfall balance = 88 - Total , unless total>88

Notes: 'ICE' = 'In Course of Erection'

'Full' = sites with full planning permission

'Outline'=sites with outline permission

'Total'= ICE + Full + Outline

'Windfall balance' = 91 - Total , unless total>91

### Appendix D – amendments to base data compared to WSCC published completions data for 2013-14

6 additional completions have been identified post the WSCC 2014 RLA final reports. They are as follows:

Additional completions not included in WSCC 2014 completions data:			
Site	Proposal	Completion date	Evidence of completion
LU/51/10 - 18-22 High St Littlehampton	C/U offices to 4 flats	Nov-12	Revenues and Benefits records - first occupation
LY/8/10 Arundel Station	C/U office to flat	Apr-10	Revenues and Benefits records - first occupation
AL/75/10 - Lydney Caravan site	New warden office/dwelling	24/09/2011	Revenues and Benefits records - first occupation
Year	Net additions		
2010/11	1		
2011/12	1		
2012/13	4		

This has the effect of increasing the supply for the period 2011-14 by 6 dwellings, which decreases the required supply in the 2014-19 period accordingly.