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20 November 2018

PLANNING POLICY SUBCOMMITTEE

A meeting of the Planning Policy Subcommittee will be held in Committee Room 1 (the Pink Room) at the Arun Civic Centre, Maltravers Road, Littlehampton on **Wednesday 5 December 2018 at 6.00 p.m.** and you are requested to attend.

Members: Councillors Bower (Chairman), Charles (Vice-Chairman), Ambler, Mrs Bence, Mrs Brown, Chapman, Cooper, Elkins, Mrs Hall, Haymes, Oppler, Mrs Pendleton and Stanley [+ 1 Independent Vacancy].

AGENDA

1. APOLOGIES FOR ABSENCE
2. DECLARATIONS OF INTEREST

Members and Officers are reminded to make any declarations of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda and are reminded that they should re-declare their interest before consideration of the item or as soon as the interest becomes apparent.

Members and officers should make their declaration by stating :

- a) the item they have the interest in
- b) whether it is a pecuniary, personal and/or prejudicial
- c) the nature of the interest

- 3 MINUTES

To approve as a correct record the Minutes of the meeting of the Community Infrastructure Levy [CIL] Subcommittee held on 27 September 2018 and the Minutes of the meeting of the Local Plan Subcommittee held on 16 October 2018 (attached).

4 ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5 ARUN LOCAL DEVELOPMENT SCHEME

The Council is required to produce, and keep up to date, a Local Development Scheme (LDS). The LDS provides a work programme for the production of those Development Plan Documents to be prepared over the next three year period. The most recent LDS came into effect following a report to the then Local Plan Sub-Committee on 11 June 2018 with subsequent adoption at Full Council on 18 July 2018.

With the adoption of the Arun Local Plan (2011-2031) on 18 July 2018 and further changes published to national planning policy i.e. the National Planning Policy Framework (NPPF) July 2018, it is considered that this is an appropriate time to revisit the work programme of the Planning Policy Team, and update the LDS accordingly taking into account any slippage, resources and future risks.

6 STATEMENT OF COMMUNITY INVOLVEMENT

The Statement of Community Involvement (SCI) is a statutory document which sets out the ways in which the Council will engage with residents, communities, businesses, local organisations and other groups to ensure as many people as possible are able to have a say in planning decisions that affect them.

The document provides guidance on how the planning system works and how the Council will inform, consult and involve people in planning decisions within the Arun District Local Planning Authority Area (i.e. excluding that part of the District covered by the South Downs National Park Planning Authority).

A draft Statement of Community Involvement was agreed for consultation at the then Local Plan Sub-Committee meeting of 11 June 2018. Consultation was held between 23 July and 17 August, 2018, and in response to this consultation a small number of clarifications have been made to the document.

If adopted, this document will replace the SCI that was published in 2012 which had become out of date as a result of legislative changes to the planning system.

7 COMMUNITY INFRASTRUCTURE LEVY [CIL] EVIDENCE BASE AND PRELIMINARY DRAFT CHARGING SCHEDULE

On 27 September 2018, the then Community infrastructure (CIL) Sub-Committee deferred the decision to note the CIL Viability Evidence and make recommendations to Full Council that the Preliminary Draft Charging Schedule be published for consultation until all Members had received a CIL briefing.

This report will be presented to the Planning Policy Sub-Committee following an arranged Briefing (4 December 2018). It combines the CIL Viability Evidence and the proposed Preliminary Draft Charging Schedule reports that were taken to the former CIL Sub-Committee in September and asks the Planning Policy Sub-Committee to agree that the Preliminary Draft Charging Schedule is published for consultation.

8 HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (UPDATE 2018)

The Council has reviewed and updated its Housing and Economic Land Availability Assessment (HELAA). This document provides the Council with a database of sites within the District. The Sub-Committee is requested to note this report.

9 ARUN DISTRICT COUNCIL GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

A revised joint Authority Gypsy and Traveller and Travelling Show-people Accommodation Assessment (GTAA) has been commissioned to reflect the regulation change to the definition of Gypsies and Travellers and Travelling Show-people and assess Arun's need on this basis. The GTAA will form the evidence base to inform the allocation of sites through the Arun District Council Gypsy and Traveller and Travelling Show-people Site Allocations Development Plan Document (DPD).

This report outlines the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Show-people Site Allocations DPD covering the period 2018-2036.

10 RESPONSE TO DRAFT LOCAL PLAN FOR WORTHING BOROUGH COUNCIL

This report provides information on Worthing Borough Council's Local Plan consultation. The Draft Worthing Local Plan covers the period 2016 to 2033 and has been put to public consultation for six weeks being 31 October to 12 December 2018.

The proposed plan sets out a strategy, site allocations and policies to deliver Worthing's housing and development needs over this period. Arun will need to make a response because of the cross boundary implications of this Plan which does not propose to meet all of its overall Objectively Assessed Housing Need (OAN). This is significant because Worthing is within a shared housing market area (HMA) with Arun and Adur, Brighton & Hove, Chichester, Lewes, Worthing and the South Downs National Park Authority.

Note: *Indicates report is attached for all Members of the Subcommittee only and the press (excluding exempt items). Reports can be accessed through the Council's website at www.arun.gov.uk

Note: Members are also reminded that if they have any detailed questions, would they please inform the Chairman and/or relevant Lead Officer in advance of the meeting.

COMMUNITY INFRASTRUCTURE LEVY (CIL) SUBCOMMITTEE

27 September 2018 at 6.00 p.m.

Present : Councillors Bower (Chairman), Mrs Hall (Vice-Chairman), Bicknell, Mrs Bower, Charles, Cooper, Elkins and Purchase.

1. Declarations of Interest

There were no declarations of interest made.

2. Minutes

The Minutes of the meeting held on 18 June 2015 were approved by the Subcommittee as a correct record and signed by the Chairman.

3. CIL Evidence Base Update

In order to recommence work on the preparation of the Arun CIL (Community Infrastructure Levy) Charging Schedule, the Principal Planner advised that the Local Plan Viability Report (January 2017) had been revisited and updated and the latest infrastructure evidence reviewed. The report on the table therefore set out the key findings from that evidence, including the identification of an infrastructure funding gap and that a CIL charge would remain viable on certain types of development within the district.

HDH Planning had prepared the CIL Viability Update Report 2018, which had been uploaded to the website, and section 7 of that report was provided as an appendix to the report for Members as a useful summary of its findings.

In presenting the update, the Principal Planner highlighted the following points:-

- The study had been prepared based on the methodology used for the Local Plan Viability Report. This evidence had been examined during the Local Plan Hearings and the Inspector had made reference to it. On that basis the Local Plan viability evidence could be considered to be sound.

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- The viability evidence provided an updated framework for assessment, including ensuring that residential values, land values, development costs and profit assumptions were up to date.
- The outcomes of the viability tests illustrated that there continued to be a variation in viability across the district. This was represented in the charging zones table provided in Table 1 of the report (para 7.52).
- The level of CIL charge was detailed between paragraphs 7.34 and 7.50 and the final recommended rates were presented under paragraph 7.52.
- The zero rate was particularly highlighted for the strategic sites and it was explained that this was due to a number of factors set out in the CIL Viability Update Report and within the Arun Local Plan Viability Report, 2017. It was emphasised that all infrastructure requirements, including 30% affordable housing on the strategic sites would be delivered through high S106 costs, which would result in CIL being unviable on these sites. A CIL rate would therefore put delivery of affordable housing on strategic sites at risk.
- The final suggested rates were set within a level of viability which ensured that the level of CIL would be less than 5% of the Gross Development Value on all sites (this was a useful benchmark to use to show that out of all development costs, CIL was a relatively small element). The report therefore indicated that the Council could support the preparation of a CIL charging schedule.

The Subcommittee participated in some discussion on a number of points raised in the report, in particular relating to Strategic Sites and Older Peoples' housing.

Members expressed reservations that they were being asked to note a report that covered extremely complex issues and which they felt they had not had enough information on. Particular concern was raised with regard to the zero rating being proposed for certain development and the question was asked if there was information relating to the experience of other charging authorities in this respect. Further information was also requested pertaining to CIL and the viability evidence. It was felt that not enough detail had been put forward to enable Members to make an informed decision at this time.

Having been formally proposed and duly seconded, the Subcommittee

RESOLVED

That the matter be deferred to enable a Members' seminar to be arranged prior to it being considered at a future meeting.

Item No. 34. Proposed preliminary Draft Charging Schedule

As a result of the deferral of the previous item, this matter was not considered and the Subcommittee

RESOLVED

That the matter be deferred to a future meeting.

(The meeting concluded at 7.15 pm)

LOCAL PLAN SUBCOMMITTEE16 October 2018 at 6.00 p.m.

Present : Councillors Bower (Chairman), Charles (Vice-Chairman), Ambler, Mrs Bence, Mrs Brown, Chapman, Cooper, Elkins, Haymes, Oppler and Stanley.

10. Apologies for Absence

Apologies for absence had been received from Councillors Cooper and Mrs Hall.

11. Declarations of Interest

There were no declarations of interest made.

12. Minutes

The Minutes of the meeting held on 11 June 2018 were approved by the Subcommittee and signed by the Chairman as a correct record.

13. Housing Distribution Methodology for Neighbourhood Plans and the Non-Strategic Sites Development Plan (NSS DPD)

(During the course of discussion on this item, Councillor Elkins declared a personal interest as a member of Ferring Parish Council and West Sussex County Council.)

The Planning Policy Team Leader presented this report which provided an update on the steps the Council was taking to address the requirement to provide an additional minimum of 1,250 dwellings now the Local Plan had been adopted. The delivery of that target would be via new or revised Neighbourhood Plans [NPs] together with a Non-Strategic Sites Development Plan Document [NSS DPD] where Neighbourhood Plans were not being prepared/reviewed.

The Subcommittee was advised that there had been ongoing dialogue with the Parish Councils and a workshop held on 3 October had been well attended. However, there was still a lot of uncertainty around the position of a number of the Parish Councils regarding whether they would be reviewing their Neighbourhood Plans. It would be of benefit to the Parish Councils if they prepared/reviewed their own Plans because they would then be in

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control of shaping their housing policies and the distribution of those dwellings. If they did not engage with the process and become actively involved and there was a failure to meet the housing targets, the shortfall would be met through the NSS DPD.

It was anticipated that by January 2019 a final set of figures would be available which would provide the targets for housing to be met through the NP process and for the residual element to be met via the NSS DPD. A first round of consultation would then be undertaken on the initial figures in the spring 2019 and a second round on the actual plan in the summer 2019.

A number of questions were asked and responded to at the meeting by the Planning Policy Team Leader and the Group Head of Planning. These centred on the process of engagement with the Parishes, which Members were advised had been ongoing for 2½ years through letters, meetings, 1:1s; and a workshop. The Planning Policy Team Leader stated that he had received a number of positive comments from the Parishes regarding the process and that the significant resistance had come from those Parishes that had already had large allocations of housing as they felt that even more housing would result in the potential for substantial overdevelopment.

Further information was provided on windfall sites and how the housing targets would be monitored through adjustments to the monitoring framework to ensure that there was no double counting towards the housing supply sources set out in table 12.1 of the adopted Local Plan.

In turning to the recommendations and following some discussion, it was agreed for clarification that the words “for consultation” would be inserted immediately after “as the starting point” in recommendation (2). The Subcommittee then

RESOLVED - That

(1) the process of agreeing the housing distribution methodology and commitment to Neighbourhood Plan making with the Parish Councils and Neighbourhood Planning bodies, in order to achieve the 1,250 target, be supported; and

(2) the broad distribution targets as set out at Appendix1 be agreed as the starting point for consultation for plan making, subject to further adjustments from workshop engagement, and testing via the methodology and the sustainability appraisal process, with a view to finalising the distribution in January 2019 and undertaking a Regulation 18 Notification (Part 1) issues and options consultation..

14. Arun District Council Gypsy & Travelling Showpeople Site Allocations Development Plan Document (DPD)

The Subcommittee was reminded by the Planning Policy Team Leader that there was a commitment in the adopted Local Plan for a statutory Development Plan Document (DPD) relating to Gypsy and Traveller and Travelling Showpeople Site Allocations in the Arun District. A revised joint authority Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) had been commissioned and would form the evidence base to inform the allocation of such sites in Arun. The evidence work had been finalised and was due for publication by the end of October 2018.

It was proposed that, as there was a requirement for the provision of an element for non-travelling households, it made sense to twin track the work for this DPD and the Non-Strategic Sites DPD. Therefore, it was anticipated that the proposed Regulation 18 consultation would go ahead in the spring of 2019, with the draft plan being prepared for consultation in the summer of 2019.

In discussing the item, a request was made that comparable figures for Worthing and Adur and Chichester should be provided to enable Members to see what the distribution of pitches would be. It was confirmed that these would be brought back to the December meeting.

A question was asked with regard to non-travelling showpeople and the Planning Policy Team Leader advised that any allocation would be based on their cultural needs. Member comment was made that the identified target of 13 should not be allocated to one site but should be dispersed throughout the District.

The Subcommittee

RECOMMEND TO FULL COUNCIL

That the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocation Development Plan Document covering the period 2018-2036, including the key outputs of the Gypsy and Traveller Accommodation Assessment Report 2018, be noted.

15. The Published Revised National Planning Policy Framework (NPPF) 2018

The Government published a revised National Planning Policy Framework (NPPF) on 24 July 2018 following an earlier consultation (including on accompanying documents) on 5 March 2018. A briefing note had been circulated in April to all Members on the key changes.

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The Planning Policy Team Leader presented this report which provided an update on the key changes and any implications for plan making within the Arun District, including the maintenance of housing supply. He highlighted a number of points within the report and also advised that the second recommendation was not required as the Council already had the services of legal Counsel who provided advice on planning matters.

In considering the matter, the question was asked as to how monitoring would be carried out under the new NPPF tests to assess that the 5 year Housing Land Supply (HSL) would be on track by the end of 2019 to pre-empt the issues that had been experienced in the past. It was acknowledged that it would be extremely challenging as the housing requirement for the District was so high, however, that did not just apply to Arun as a number of local authorities in the South-East faced the same problem. The local authority had to demonstrate that it was doing everything possible to ensure housing would be delivered in order to contest that it should not be subject to sanctions if events occurred outside of its control, i.e. if developers were unable to deliver.

The Group Head of Planning advised that the change in the NPPF with regard to the Housing Delivery Test would have a significant impact. A report was going to Cabinet on 12 November 2018 to seek a decision as to how best to resource the increased workload that would be a result of that change, together with the fact that there would be ongoing work to review the Local Plan.

The Subcommittee then

RESOLVED

That the key policy provisions made by the revised NPPF 2018 and consequent implications for Arun District Council's Plan making, monitoring and housing supply and consequent need for increased resources and a resultant report to Cabinet, be noted.

16. Merger of Local Plan Subcommittee (LPSC) and Community Infrastructure Levy (CIL) Subcommittee

The Group Head of Planning advised by way of this report that, in the interests of efficiency, it was now considered appropriate to merge the Local Plan Subcommittee and the Community Infrastructure Levy Subcommittee. It was proposed to name the new body the Planning Policy Subcommittee.

Following a brief discussion, the Subcommittee

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RECOMMEND TO FULL COUNCIL – That

(1) the transfer of the function of the Community Infrastructure Levy Subcommittee to the Local Plan Subcommittee be agreed;

(2) the Local Plan Subcommittee be renamed the Planning Policy Subcommittee to reflect its wider remit;

(3) the revised Terms of Reference for the Planning Policy Subcommittee, as set out at Appendix A to the report, be accepted; and

(4) the Group Head of Council Advice and Monitoring Officer be authorised to make any consequential amendments to the Constitution.

(The meeting concluded at 7.15 pm)

AGENDA ITEM NO. 5**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT**

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| SUBJECT: Arun Local Development Scheme |
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| REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader |
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| DATE: 12 November 2018 |
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| PORTFOLIO AREA: Planning |
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EXECUTIVE SUMMARY:

The Council is required to produce, and keep up to date, a Local Development Scheme (LDS). The LDS provides a work programme for the production of those Development Plan Documents to be prepared over the next three year period. The most recent LDS came into effect on the June 2018 following a report to the then Local Plan Sub-Committee on 11 June with subsequent adoption at Full Council on 18 July 2018.

With the adoption of the Arun Local Plan (2011-2031) on 28th July 2018 and further changes published to national planning policy i.e. the National Planning Policy Framework (NPPF) July 2018, it is considered that this is an appropriate time to revisit the work programme of the Planning Policy Team, and update the LDS accordingly taking into account any slippage, resources and future risks.

The revised LDS (attached as Appendix 1) includes the updated timescales for the production of the Non-Strategic Site Allocations DPD, Gypsy & Traveller Site Allocation DPD and Community Infrastructure Levy Charging Schedule (preparation of Supplementary Planning Guidance is no longer reported in an LDS).

RECOMMENDATIONS:

The Sub-Committee is asked to recommend to Full Council that:-

1. that the Local Development Scheme 2018/19 as amended (and set out in Appendix 1 to the report is adopted; and
2. authority be delegated to the Group Head of Planning, in consultation with the Chairman of the Planning Policy Sub-Committee, to undertake minor updating and drafting of any amendments required to the LDS prior to publication.

1. BACKGROUND:

- 1.1 Local Planning Authorities are required to produce a Local Development Scheme (LDS) under Section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The LDS must specify (among other matters) the documents which, when prepared, will comprise the Development Plan for the area. The LDS must be made publicly available and kept up-to-date. It is also a legal requirement to have an up to date LDS, as this is one of the tests of compliance at a 'Development Plan Document' examination.

2 REPORT

- 2.1 The LDS is a short, high level work programme that sets out what Development Plan Documents (DPD) the Council is going to produce over a rolling three year period. The revised LDS outlines the timetable for producing each DPD, along with the key dates and milestones to be met.
- 2.2 The dates set out in the timetable are monitored each year from 1st April to 31 March through the Authority Monitoring Report. Such monitoring enables the LPA to review document production progress, and amend the timetable and resource requirement as necessary.
- 2.3 The current LDS came into effect on 18 July 2018 to reflect the stage that had been reached with the preparation of Arun Local Plan (ALP). However, the ALP was also adopted on that date and national policy changes were also published in July 2018 (with the revised NPPF and PPG). It is therefore considered that this is an appropriate time to revisit the work programme.
- 2.4 The revised LDS (attached as appendix 1) covers the three year period from 2018-2021 and includes a timetable for the preparation of the Non-Strategic Sites Allocation DPD (i.e. allocating sites of circa 300 or fewer dwellings) and a Gypsy and Traveller and Travelling Showpeople Site Allocations DPD. Progress has also been made on the evidence base for preparing the CIL charging schedule.
- 2.5 It is intended that the LDS will come into effect following the Full Council meeting on the 9 January 2019. A copy of the LDS will be made available on the Council's website as soon as possible following that meeting.
- 2.6 It is anticipated that following the autumn budget statements that further potential changes may also be made to the planning obligations and CIL regulations which may affect processes with announcement anticipated in the Spring. The LDS therefore, needs some adjustment because there could be implications for DPD and CIL timetables. However, it is considered that the LDS update should not be delayed pending the outcome of this process because of the need to progress a CIL Preliminary Draft Charging Schedule consultation (over December 2018 to January 2019) the Non-Strategic Sites DPD and support the Neighbourhood Planning process.

Key Timetable Adjustments

2.7 The key timetable adjustments proposed for the Non-Strategic Sites Development Plan Document (NSS DPD) and Gypsy & Traveller Site Allocations DPD (G&TDPD) - which is being progressed to a similar timetable because of efficiencies with evidence preparation and examination stages - are as follows:-

- Regulation 18(1) June/July/August 2019
- Regulation 18(2): December 2019/January 2020
- Regulation 19: May/June 2020
- Submission: September 2020
- Examination: October onwards
- Adoption: May 2021

2.8 The CIL preparation below is provisional pending approval by the Planning Policy Sub-Committee:-

- CIL PDCS consultation December 2018 - January 2019
- Draft Charging Schedule consultation Spring 2019
- Final Charging Schedule submission Summer 2019
- Examination Autumn 2019
- Inspector's report Winter 2019
- Adoption Spring 2020

Conclusions

2.9 It is anticipated that although this LDS adjustment signals some slippage, the key submission dates for the DPD preparation will remain within 2020 - sufficient for the Council to defend its position on land supply for the purposes of the ALP 2018 and the NSS DPD and G&T DPD. Further, the period over April/May 2019 can be used to progress other supporting work on the DPDs to ensure draft plan consultations (Regulation 18 (2) in the autumn 2019 progress quickly which may allow for some time to be recovered.

2.10 The Gypsy and Traveller DPD preparation timetable mirrors that of the NSS DPD in order to achieve efficiencies with evidence preparation on land supply and also with a coincident examination. However, should the consultation issues and allocations be fairly straight forward – there may be opportunities for the G&T DPD timetable to adoption to be accelerated.

2. OPTIONS:

The LDS timetable can be revised as proposed to ensure timely delivery of key DPD work streams or not be amended.

4. CONSULTATION: None

| | YES | NO |
|---|------------|-----------|
| Has consultation been undertaken with: | | |
| Relevant Town/Parish Council | | X |
| Relevant District Ward Councillors | X | |
| Other groups/persons (please specify) | | |
| 5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | YES | NO |
| Financial | | X |
| Legal | | X |
| Human Rights/Equality Impact Assessment | | X |
| Community Safety including Section 17 of Crime & Disorder Act | | X |
| Sustainability | | X |
| Asset Management/Property/Land | | X |
| Technology | | X |
| Other (please explain) | | X |

6. IMPLICATIONS:

There are no direct implications arising from the proposed revisions to the timetable for the community within Arun although an updated timetable adjusted for contingencies and resource planning will help to ensure that the Council prepares sound DPDs in accordance with legal requirements when tested at examination. Otherwise, there may be risk to the soundness, and delivery of plan making adversely affecting a sustainable policy framework for the future development of the District.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to ensure that decisions relating to development within the District accord with up to date development plans consistent with sustainable development.

8. BACKGROUND PAPERS:

All relevant documents, including the evidence base, summary leaflets and response form can be viewed on the Council's website from 31st October at: www.adurworthing.gov.uk/worthing-local-plan/.

ARUN DISTRICT COUNCIL
LOCAL DEVELOPMENT SCHEME
2018 – 2021



ARUN DISTRICT COUNCIL LOCAL DEVELOPMENT SCHEME

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1. Introduction

- 1.1 This is the Local Development Scheme (LDS) for the period 2018-2021. The scheme has been prepared in conformity with the Planning and Compulsory Purchase Act 2004 (The Act), as amended by section 111 of the Localism Act 2011. The local planning authority must resolve that the scheme is to have effect and specify the date from which it will do so.
- 1.2 The Act (as amended by the Localism Act 2011) states that a Local Development Scheme must specify:-
- The local development documents which are to be development plan documents;
 - The subject matter and geographical area to which each development plan document relates;
 - Which development plan documents, if any, are to be prepared jointly with one or more other local planning authorities;
 - Any matter or area in respect of which the authority has agreed (or proposes to agree) to the constitution of a joint committee [with other local planning authorities]; and
 - The timetable for the preparation and revision of the development plan documents.
- 1.3 The LDS therefore, sets out the current Development Plan and introduces the scope and timeframe for preparing the emerging local Development Plan Documents (DPDs), which will form the Development Plan.

Recent Changes to the Planning System

- 1.4 The Local Plan must be prepared in accordance with the National Planning Policy Framework (NPPF) which was revised and published in July 2018. The NPPF must also be read alongside Planning Policy for Traveller Sites which was published in March 2012 and the Planning Practice Guidance, published in March 2014.
- 1.5 The Localism Act 2011 allows for communities to draw up Neighbourhood Development Plans. In Arun's Local Planning Authority Area, there are currently (as of March 2018) 17 Neighbourhood Development Plans (NDPs) being produced in accordance with the Neighbourhood Planning (General) Regulations 2012. Of this number, 15 have been formally adopted ('made') by Arun District Council. Once NDPs are adopted ('made'), they will sit beside the Arun Local Plan and become part of the statutory Development Plan which guides decision making in the district.
- 1.6 The Community Infrastructure Levy (CIL) Regulations came into force in 2010. The council is currently considering preparing a CIL

charging schedule based on updated viability evidence which if CIL proceeds will set a charge upon development taking place in the district.

2. Arun District Council's Development Plan

2.1 All planning applications in Arun District Council must be considered against the Development Plan which within the Arun local planning authority area (i.e. outside of the South Downs National Park area that falls within part of Arun District) currently consists of the following adopted plans:

- Arun Local Plan 2018
- West Sussex Joint Minerals Local Plan 2018 (i.e. prepared by West Sussex County Council and South Downs National Park Authorities)
- West Sussex Waste Local Plan (2014)
- Made Neighbourhood Development Plans:
 - Aldingbourne
 - Angmering
 - Arundel
 - Barnham & Eastergate
 - Bersted
 - Bognor Regis
 - Climping
 - East Preston
 - Felpham
 - Ferring
 - Kingston
 - Littlehampton
 - Rustington
 - Walberton
 - Yapton

Arun Local Plan (2011-2031)

2.2 The Arun Local Plan was adopted by Full Council on 18th July 2018 (incorporating all of the Main Modifications), and it replaces the Local Plan 2003 (in its entirety within Arun local planning authority area) and, all of the saved policies from the 2003 plan. Decisions on planning applications will need to accord with the Adopted Arun Local Plan 2018 unless other material circumstances indicate otherwise.

West Sussex Minerals Local Plan 2003

2.3 The West Sussex Joint Minerals Local Plan (JMLP), which was adopted in July 2018, ensures the supply of minerals to at least 2033. It sets out the vision, objectives and strategy for mineral land-use planning in West Sussex, and provides 10 strategic policies and 15

Development Management polices to provide a policy framework for determining mineral planning applications. It also sets out minerals safeguarding areas and facilities, and site allocations for minerals development. The JMLP replaces any saved policies and development management decisions must accord with the statutory development plan for West Sussex unless material circumstances indicate otherwise. The JMLP can be found on the West Sussex County Council web site:-

www.westsussex.gov.uk/mwdf.

The West Sussex Waste Local Plan

- 2.4 The West Sussex Waste Local Plan (WLP) (2014) was adopted on 11th April 2014. It sets the vision, objective and strategy for waste planning in West Sussex until 2031. It includes Use-Specific Policies, Development Management Policies and Waste Site Allocation policies. The allocation policies aim to ensure there is sufficient capacity to meet identified shortfalls in transfer, recycling and recovery capacity across the county. The WLP includes two strategic sites within Arun District at Hobbs Barn, near Climping and Site north of Wastewater Treatment Works, Ford. These are included on the Arun Local Plan Policies Maps.

Neighbourhood Development Plans

- 2.9 There are 15 Neighbourhood Development Plans within the Arun District that have been adopted. These give communities the power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They include the location of new homes, shops and offices. They influence what those new buildings should look like and inform what infrastructure should be provided. the Ford Neighbourhood Plan has recently passed referendum and is due to be made following Full Council resolution on 9th January 2019.

3. Emerging Plans

Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document

- 3.1 The LDS 2014-2017 explains that the Arun Local Plan 2011-2031 (referred to as ALP) will include site allocations, development management policies and Gypsy and Traveller policies for the whole of the Arun Local Planning Authority Area (i.e. excluding that part of the South Down National Park planning authority area which falls within Arun District) . However, during preparation and examination of the Local Plan it became clear that the evidence timetable was delayed and that further site evidence work would be required. As a consequence it was agreed that a separate Gypsy & Traveler Development Plan Document would need to be prepared for the Arun Local Planning Authority area. The adopted ALP 2018 therefore provides an overview

of the current status of the evidence base including the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment and Sites Study. It explains that it was considered appropriate and in accordance with national planning guidance, that ADC would work with the coastal West Sussex authorities (Worthing Borough and Adur District and Chichester District), the South Downs National Park Authority and West Sussex County Council to develop a joint evidence base.

- 3.2 It is important however, that the Gypsy and Traveller and Travelling Showpeople Sites Allocation DPD is prepared closely following the adoption of the ALP 2018 to ensure that it meets the requirements of the Planning for Traveller Sites Policy (August 2015). Further details regarding the timetable for the preparation of this DPD is provided in **Appendix 1**.

Non-Strategic Site Allocations Development Plan Document

- 3.3 The ALP 2018 (with Main Modifications) was adopted by the District Council in July 2018. Whilst the Local Plan sets out the strategic pattern of growth and development in the whole district for the Arun District Local Planning Authority area (i.e. excluding that part of the South Down National Park planning Authority area which falls within Arun District) until 2031, it also identifies that further development is required to be identified. The ALP 2018 includes a commitment to provide at least 1,250 dwellings in a separate Non-Strategic Sites DPD (NSSDPD) which will also cover the Arun Local Planning Authority area, supplemented with any new or updated Neighbourhood Development Plans.
- 3.4 The NSSDPD will allocate sites in accordance with the ALP 2018 development strategy and set a housing target for any Neighborhood Plans where appropriate. The location of these will be based upon the location strategy as defined in the ALP 2018, and the number of Neighbourhood Plans being reviewed.
- 3.5 The NSSDPD will allocate land for residential development that is classified as 'Non-strategic'. A strategic allocation is defined within the ALP as one being 300 dwellings or more. Therefore, this DPD will identify sites under that threshold although depending on circumstances it may be appropriate for some sites to be included which may deliver a housing yield above this benchmark.
- 3.6 The Council and Neighborhood Planning Groups will use the Housing & Economic Land Availability Assessment (HELAA) as a source of evidence to identify Non-Strategic sites to be allocated either through Neighbourhood Plans and/or the Non-Strategic Sites Allocations DPD. This will give the Council more control over allocating small sites within the Plan period.
- 3.7 The Council commenced work on the Non-Strategic Sites Allocation

Document immediately on adoption of the Arun Local Plan. The DPD will be prepared alongside the review of those Neighbourhood Development Plans where there has been a commitment to do this.

4. Supporting Documents

Supplementary Planning Documents

- 4.1 As well as programming work on the DPDs, the council may also choose to prepare SPDs. The SPDs do not have the status of DPDs but would be the subject of consultation and, once adopted, would form part of the LDF. Under the Planning Act 2008 there is no need for SPDs to be included within the LDS.

CIL Charging Schedule

- 4.2 The Local Plan identifies what infrastructure is needed within the District over the lifetime of the Plan, when it will be provided and how much it will cost. This is set out within the Infrastructure Delivery Plan (IDP)
- 4.3 The Community Infrastructure Levy (CIL) Regulations were introduced in April 2010 and allow charging authorities to set a charge on development in order to fund the infrastructure identified through the Infrastructure Delivery Plan (IDP). To ensure that the charging schedule is based upon the infrastructure requirements identified within the adopted ALP 2018, preparation of the CIL charging schedule follows the adoption of the ALP 2018. However, it should be noted that the CIL charging schedule, once adopted, will not form part of the development plan. Furthermore, a decision on preparation and a timetable the CIL charging schedule is yet to be agreed by the Council's Planning Policy Sub-Committee. Once a timetable has been agreed, it will be published on the ADC website

Statement of Community Involvement

- 4.4 The Statement of Community Involvement sets out the Council's process for undertaking consultation on both planning policy documents and as part of the Development Control process.
- 4.5 The SCI was last reviewed in 2012, and is being amended in 2018 to take in to account amendments to legislation. When the revised SCI is adopted, all forthcoming consultations must be carried out in accordance with that version of the SCI.

5. Process and Procedures

Resources

- 5.1 The Planning Policy and Conservation Team (3 FTE + 4 PT) are leading the production of the Local Plan and supporting DPDs and the CIL charging schedule. It will be necessary to fill vacancies arising as a priority and at particular times to employ consultants, where time constraints require it, or to produce work for which specialist expertise is required. It may also be necessary at particular times to draw in staff from other parts of the council to help with particular pieces of work.
- 5.2 A project management approach is being employed in the preparation of the documents listed above to ensure that the timescales set out in this document are met. This will enable the continual review of all of the risks associated with delivery and the effective management of resources. A risk assessment is provided in **Appendix 2**.

Monitoring and Review

- 5.3 The Localism Act removed the requirement for Local Planning Authorities to submit Annual Monitoring Reports to the Secretary of State. Instead authorities are now required to prepare an Authorities Monitoring Report and make this available to the public. This report monitors details such as the progress of the preparation and implementation of Local Development Documents including the Local Plan and Supplementary Planning Documents (all data to be included within the authorities monitoring report is set out in Regulation 34 of the Town and Country Planning, (Local Planning) (England) Regulations 2012. Arun District Council's most up to date monitoring report can also be accessed on the ADC website using the following link:
<http://www.arun.gov.uk/authority-monitoring-report>

Reviewing the Local Development Scheme

- 5.4 The Council may produce a revised Local Development Scheme during the period if required to reflect any changes in the documents to be prepared. This could be as a result of changes in the planning system, legislation or resource constraints.

APPENDIX 1 – Development Plan Document (DPD) Profiles

| Non-Strategic Site Allocation Development Plan Document | | |
|--|---|--------------------|
| Geographical Area | All parts of Arun District excluding that part within the South Downs National Park Boundary | |
| Subject to Independent Examination | Yes | |
| Produced jointly with other authorities | No, although Parish and Town Council's may wish to assist and update their NPs accordingly | |
| Timetable | Regulation 18(1) consultation | Summer 2019 |
| | Regulation 18(2) consultation | Winter 2019/2020 |
| | Pre-Submission Publication. Regulation 19 | Spring/Summer 2020 |
| | Submission | Autumn 2020 |
| | Examination | Autumn/Winter 2020 |
| | Inspector's Report Received | Spring 2021 |
| | Adoption | Spring 2021 |
| Resources | The document will require significant input from the Planning Policy Team and officers from other Council Departments | |
| Review | Once adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report | |

| CIL Charging Schedule (provisional pending decision of Planning Policy Sub-Committee) | | |
|--|---|-------------|
| Geographical Area | Arun District but excluding that part within the South Downs National Park Boundary | |
| Subject to Independent Examination | Yes | |
| Produced jointly with other authorities | No | |
| Timetable | Evidence preparation | Summer 2018 |
| | Preliminary Draft Charging Schedule consultation | Winter 2018 |
| | Consultation on Draft Charging Schedule | Spring 2019 |
| | Submit Final Charging Schedule | Summer 2019 |
| | Examination | Autumn 2019 |
| | Inspector's Report Received | Winter 2019 |
| | Adoption | Spring 2020 |
| Resources | The document will require significant input from the Planning Policy Team and officers from other Council Departments | |
| Review | Once adopted, the policy and delivery strategy will be monitored in the Authority Monitoring Report | |

| Gypsy and Traveller Sites DPD | | |
|--|--|-------------------------|
| <p>The Gypsy and Traveller and Travelling Showpeople Sites DPD will identify a supply of specific deliverable sites sufficient to provide five years' worth of sites, to meet the locally set target which is underpinned by the Gypsy and Traveller Accommodation Assessment (GTAA). This will include provision for public and private sites. The DPD will also identify a supply of specific developable sites or broad locations for growth, for year's six to ten and years eleven to fifteen of the plan period.</p> <p>It is important that the preparation of the DPD is carried out alongside, or closely following the Local Plan to ensure that the Council is meeting the objectively assessed requirements for Traveller sites.</p> | | |
| Geographical Area | Arun District but excluding that part within the South Downs National Park Boundary | |
| Subject to Independent Examination | Yes | |
| Produced jointly with other authorities? | No, although related background evidence has been produced jointly with the Coastal West Sussex authorities and West Sussex County Council. The approach for transit provision has been agreed countywide. | |
| Timetable | Regulation 18 (1) consultation | Summer 2019 |
| | Reg 18 (2) draft plan consultation | Winter 2019 |
| | Pre-Submission publication. Regulation 19 | Spring 2020 |
| | Submission | Summer 2020 |
| | Examination | Autumn/Winter 2020 |
| | Inspector's Report Received | Winter 2020/Spring 2021 |
| | Adoption | Spring 2021 |
| Resources | The document will require significant input from the Planning Policy Team and officers from other Council Departments | |
| Review | Once the Gypsy and Traveller and Travelling Showpeople Sites DPD is adopted, the policy and delivery strategy will be monitored annually in the Authority Monitoring Report | |

APPENDIX 2 - Risk Assessment

| High to Low 1-12 | Risk | Impact | Actions |
|------------------|--|--|---|
| 1 | Elections cause delays in decision making | - Causes slippage in programme - Possible change in emphasis in document | - Ensure that timetable is flexible to change. Plan Local Plan Preparation around processes external to Planning Policy Team |
| 2 | Loss/recruitment difficulties - key staff | Slippage in programme | - Recruit to vacant posts as quickly as possible |
| 3 | Updates to evidence base studies and new reports undertaken by external specialists are delayed or take longer than anticipated. | - Causes slippage in programme - Sections of the Local Plan cannot be completed due to lack of evidence. | - Ensure briefs for consultants are clear and hold regular project progress meetings. - Set clear deadlines for consultants |
| 4 | Policy Team required to do other unforeseen work, including additional appeals/work on other corporate projects | - Diverts team from LDF causing a slippage in programme | - Local Plan made a corporate priority and other work minimised - Consider additional resources/using staff from other departments |
| 5 | Lack of in-house skills for specialised areas of policy work/Sustainability Appraisals/background studies | - Slow progress causing a slippage in programme - Objectives on quality compromised - Evidence base is challenged/undermined | - Ensure financial resources available to commission work - Take prompt action to fill vacancies - Ensure working arrangements between teams are clear. |

| | | | |
|---|---|--------------------------------|--|
| 6 | Volume of work greater than anticipated e.g. on submitted representations | - Causes slippage in programme | <ul style="list-style-type: none">- Ensure timetable is realistic but has some flexibility built in- Monitor progress against LDS- Consider additional resources |
|---|---|--------------------------------|--|

| High to Low 1-12 | Risk | Impact | Actions |
|------------------|--|---|---|
| 7 | Insufficient budget provision to finance the project | <ul style="list-style-type: none"> - Work slips or cannot be progressed - Objectives on quality compromised | <ul style="list-style-type: none"> - Budget and spending to be kept under review |
| 8 | Local Plan programme too ambitious | <ul style="list-style-type: none"> - Key milestones in programme not met and Housing and Planning Delivery Grant reduced | <ul style="list-style-type: none"> - Ensure LDS is realistic - Monitor progress against LDS and amend if necessary - Prioritise Non-Strategic Site Allocations DPD and G&T DPD |
| 9 | Planning Inspectorate unable to meet the timescale for examination and reporting | <ul style="list-style-type: none"> - Examination and/or report is delayed - Key milestones in programme not met | <ul style="list-style-type: none"> - Close liaison with the Planning Inspectorate to ensure early warning of any problems (e.g. consultation on LDS) - Maintain up to date Service Level Agreements with the Inspectorate |
| 10 | Local Plan fails test of "soundness" | <ul style="list-style-type: none"> - DPD has to be withdrawn and further work undertaken for resubmission - Progress on other LDD/CIL charging schedule slips | <ul style="list-style-type: none"> - Ensure documents have a robust evidence base and well audited community and stakeholder engagement - Undertake NPPF and legal compliance self-assessment - Maintain close working relationship with the Planning Inspectorate, particularly with regard to new Local Plan examination process - Keep up-to-date on experience from elsewhere |
| 11 | Legal Challenge | <ul style="list-style-type: none"> - Adopted document quashed - Additional workload - Legal costs | <ul style="list-style-type: none"> - Ensure procedures, Act, Regulations etc. are complied with - Undertake soundness self-assessment |
| 12 | Community Infrastructure does not pass examination or is not adopted | Pooling restrictions on S106 contributions could reduce the ability to secure sustainable development/impact mitigation. | Work with the development industry on the potential development allocations to ensure objections are minimised and appropriate joint S106 and CIL exemptions are in place. |

AGENDA ITEM NO. 6**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT**

| |
|--|
| SUBJECT: Statement of Community Involvement |
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| REPORT AUTHOR: Martyn White, Principal Planning Officer |
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| DATE: 12 November 2018 |
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| EXTN: X 37717 |
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| PORTFOLIO AREA: Planning |
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EXECUTIVE SUMMARY:

The Statement of Community Involvement (SCI) is a statutory document which sets out the ways in which the Council will engage with residents, communities, businesses, local organisations and other groups to ensure as many people as possible are able to have a say in planning decisions that affect them.

The document provides guidance on how the planning system works and how the Council will inform, consult and involve people in planning decisions within the Arun District Local Planning Authority Area (i.e. excluding that part of the District covered by the South Downs National Park Planning Authority).

A draft Statement of Community Involvement was agreed for consultation at the then Local Plan Sub-Committee meeting of 11 June 2018. Consultation was held between 23 July and 17 August, 2018, and in response to this consultation a small number of clarifications have been made to the document.

If adopted, this document will replace the SCI that was published in 2012 which had become out of date as a result of legislative changes to the planning system.

RECOMMENDATIONS:

The Sub-Committee is asked to recommend to Full Council that:

1. the Statement of Community Involvement, attached at Appendix 1, is adopted; and
2. the Group Head of Planning, in conjunction with the Chairman of the Planning Policy Sub-Committee, be given delegated authority to agree minor editorial changes prior to publication.

1. BACKGROUND:

- 1.1 It is a requirement of the Planning and Compulsory Purchase Act 2004 for a local planning authority to produce a Statement of Community Involvement (SCI). The document sets out the standards to be met by the authority in terms of community involvement, building upon the minimum requirements set out in Planning Regulations. Essentially, it lets communities and organisations know when and how they can be involved in both the preparation of planning policy documents and decisions on planning applications.
- 1.2 The current SCI was prepared in 2012, but has now been updated to reflect changes in the planning system and planning legislation.

REPORT

CONSULTATION

- 1.3 At the then Local Plan Sub-Committee of 23 July 2018, the draft SCI was agreed for consultation which took place between 23 July and 17 August, 2018.
- 1.4 In total, 8 responses were received from individuals/organisations. A summary of these comments together with the Council's response is set out in Appendix 2.
- 1.5 Respondents generally supported the updated SCI, and many comments were observations rather than requiring specific changes to the document. Some of the respondents did however make suggestions where amendments could be made to improve the clarity of the document. Whilst, the document has therefore been amended to reflect these points, it was not however possible to make all requested changes to the document. The reasoning for this is set out in more detail in Appendix 2.

Next Steps

- 1.6 If adopted, the SCI will be published on the Council's website and will be made available at the main reception and in libraries for viewing.

2. PROPOSAL(S):

- 2.1 To adopt the updated Statement of Community Involvement, following the completion of the period of consultation.

3. OPTIONS:-

- 3.1 The following options are available to Members:

- To adopt the updated Statement of Community Involvement
- Not to adopt the updated Statement of Community Involvement

| 4. CONSULTATION: | | |
|---|------------|-----------|
| Has consultation been undertaken with: | YES | NO |
| Relevant Town/Parish Council | X | x |
| Relevant District Ward Councillors | X | x |
| Other groups/persons (please specify) | | |
| 5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | | |
| | YES | NO |
| Financial | X | x |
| Legal | X | x |
| Human Rights/Equality Impact Assessment | | x |
| Community Safety including Section 17 of Crime & Disorder Act | | x |
| Sustainability | | x |
| Asset Management/Property/Land | | x |
| Technology | | x |
| Other (please explain) | | x |
| 6. IMPLICATIONS: | | |
| <p>Financial: there is a cost implication when undertaking a period of consultation, the methods proposed will have an implication for the planning budget although this has been budgeted for.</p> <p>Legal: the SCI should be prepared taking in to account the relevant legislation including: The Town and Country Planning (Development Management Procedure) Order 2015 which establishes requirements for consultation on planning applications, and the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out minimum standards for community engagement in the development of planning policy. In addition, the Localism Act 2011 introduced a legal duty on local planning authorities to engage constructively, and on an ongoing basis on strategic cross District/Borough issues, and to support neighbourhood forums wishing to take forward neighbourhood plans.</p> | | |

| 7. REASON FOR THE DECISION: |
|--|
| <p>i) To enable an up to date and accurate SCI to set out guidance on how the planning system works and sets out how the council will inform, consult and involve people in planning decisions within Horsham District. The SCI also forms evidence for plan making examinations to help demonstrate that plans have been prepared in accordance with legal requirements.</p> <p>ii) To undertake minor editorial or typographical amendments.</p> |

8. BACKGROUND PAPERS:

Statement of Community Involvement (2012) found on the council's web site:-

www.adurworthing.gov.uk/worthing-local-plan/.



ARUN DISTRICT COUNCIL

Statement of Community Involvement 2018

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If you need this document in large print, or another language or have any comments or enquiries, please contact the Council as follows:

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BN17 5LF

Or: localplan@arun.gov.uk

Or contact the Planning Policy and Conservation Team on 01903 737500

The Statement of Community Involvement is also available on the Council website www.arun.gov.uk/planning-policy

INTRODUCTION

Planning affects everyone in our community, however most people only get involved in planning when it directly affects them. The local planning authority is usually responsible for deciding where development takes place and what happens in our towns, villages, open spaces and environment. The council does this by preparing elements of the development plan and determining planning applications.

The National Planning Policy Framework (NPPF) sets out the Government's planning policies and must be taken into account in the preparation of development plans and planning application decisions. The NPPF states that the planning system should be easier to understand, more accessible and include a commitment to involving all who are interested in planning.

Paragraph 16 of the NPPF (2018) states "Plans should:..... be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees". "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of an area, including those contained in any neighbourhood plans that may have been made." NPPF (2012) paragraph 155.

There are two key functions to the planning system; Planning Policy and Development Management.

Planning Policy: Planning documents such as the Local Plan, relevant Development Plan Documents and Supplementary Planning Documents are prepared that are used to guide development. The Documents must comply with relevant government legislation and guidance. There are specific regulatory procedures which must be followed during the production of the documents.

Development Management: Officers are responsible for determining planning applications, applications for works to trees, advertisement and Listed Building Consent.

What is a Statement of Community Involvement (SCI)?

The Statement of Community Involvement (SCI) explains how the Council will involve local communities, businesses, and other interested parties when it prepares planning policy documents and determines planning applications.

The Local Plan forms part of the development plan for the Arun Local Planning Authority Area (LPAA) and will be used as a framework for planning

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decisions. It sets out the strategy for development. The following documents are relevant:

Strategic Plans (Local Plan or Development Plan Document (DPD))

These are plans which contain policies to address the strategic priorities of an area. They set out a vision and framework for future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure as well as safeguarding the environment and resources and ensuring good design. Plans generally look 15-20 years ahead. Local Plans should be reviewed every five years.

Supplementary Planning Document (SPD)

These documents add further detail to the policies in the Local Plan or DPDs; they can be used to provide guidance but cannot be used to set out new policy.

Neighbourhood Development Plans and Development Orders

Neighbourhood planning is a key part of the Government's Localism agenda. It aims to give local communities greater power to shape development by taking a more active role in the development of planning policies at a local level. Within Arun District, neighbourhood planning will be led by town and parish councils, with Arun District Council providing technical assistance.

Community Infrastructure Levy (CIL)

A planning charge that local authorities can apply to new developments to fund infrastructure.

Review of the SCI

The SCI was last reviewed in 2012, and it is required to be reviewed again to reflect recent legislative changes.

PLANNING POLICY

Introduction

Arun District Council is responsible for preparing a planning policy framework, for its area which will be used to guide development proposals and determine planning applications. This may include Strategic (including jointly with other authorities) and Local Plans as well as supplementary planning guidance.

Part of the process of preparing policy documents involves statutory stages of consultation that must be undertaken to allow stakeholders and the public to have the opportunity to comment on the proposals.

The Council is committed to encouraging early and meaningful engagement. Whilst the formal consultation process is necessary and can add some value, we will focus on early and meaningful engagement, ensuring that proposals do their best for Arun. We understand that people will still have positive and sometimes negative views at a consultation stage, but welcome their valuable input. By engaging communities and other interested parties, the Council gains valuable local knowledge and expertise, along with community commitment to the future development of Arun.

Engagement is a two-way process of openly sharing and exchanging information, understanding different views, listening and responding to suggestions, developing trust and dialogue to support effective working relationships to the mutual benefit of all involved.

This section sets out the type of policy documents Arun District Council is likely to prepare, and how people can get involved.

Statement of Community Involvement

Consultations on all Development Plan Documents must comply with the methods set out in the adopted Statement of Community Involvement (SCI). This SCI is Arun District Council's formal policy to:-

- Identify how and when local communities and stakeholders will be involved in the preparation of the documents for Arun's Local Plan or a Strategic Plan.
- Set out community involvement in the consideration of planning applications, both minor and major. Arun District Council is using the Government's definition for 'major' development (as defined in the GDPO 1995 as amended¹) which includes applications for planning permission relating to:-

¹ See Development Management Procedure Order 2015

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‘Residential development comprising 10 or more dwellings, or a site area of 0.5 hectares and other uses where the proposed floor space exceeds 1,000m² or the site area exceeds 1 hectare’.

The Development Plan Process

The Arun Development Plan

A number of documents will be prepared as part of the Development Plan. These documents can be divided into two broad categories as follows;

| Table 1 Documents that form part of the Development Plan | |
|--|---|
| Development Plan Documents (including the Strategic/Local Plan) Neighbourhood Development Plans | <ul style="list-style-type: none"> - Strategic Policies - Local Policies - Spatial Portrait - Site Allocations (if appropriate) - Development Management Policies - Proposals Policies Map - Area Action Plans (if appropriate) - Single Issue documents |
| Supplementary Planning Documents (SPD's) | SPD's build on policies contained within the Plan. The types of SPD's required will be determined during the Plan process. |

There will be different preparation and consultation stages to undertake dependant on whether the Council is working to produce a Development Plan Document or a Supplementary Planning Document.

A timetable has been prepared which sets out the timescale for the production of any Development Plan Documents (DPD) considered necessary by the Local Planning Authority. This is referred to as the Local Development Scheme (LDS) and is available for viewing on the Councils website. The LDS covers a three year period and is reviewed on a regular basis to ensure that it is kept up to date.

A Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) must also be undertaken although HRA assessment may not be required where there are unlikely to be significant effects on national/international designations. These documents are prepared in parallel with the DPD's and continuously inform and shape plan policies.

Development Plan Document Production

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For each Development Plan Document there are seven preparation stages. These are explained in Table 2, below.

| Table 2 The Stages involved in the preparation of a Development Plan Document | |
|---|---|
| Stage | Brief explanation of process |
| 1 Evidence Gathering | Obtaining relevant information and producing studies that will form part of the evidence base. |
| 2 Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) – Scoping Report | <p>Consulting the statutory bodies on the SA, SEA and HRA which appraises the social, economic and environmental effects of the document. These are a key part of the evidence base and will help with the evaluation of reasonable alternatives. The scoping report is the first stage in the preparation of the SA, SEA and HRA.</p> <p>The appraisal and assessments are subject to consultation and take place alongside the preparation of the Development Plan Documents (DPD).</p> |
| 3 Regulation 18* Consultation | When preparing a Development Plan Document (DPD) the Council must notify certain stakeholders and individuals that they are producing the document whilst also inviting them to make representations on what the DPD should include. |
| 4 Publication of a Local Plan (Reg 19*) | Before submitting a Strategic or Local Plan to the Secretary of State, the Council will make a copy of each of the proposed submission documents and a statement of the representations procedure available for inspection at various times and places. |
| 5 Representations relating to a Local Plan (Reg 20*) | Any person may make representations to the Council about a Local Plan. Any representations must be received by a specified date. |
| 6 Submission of the Development Plan Document (Reg 22*) | The Development Plan Document is submitted to the Secretary of State along with a statement of representations procedures, summary of representations and how they were taken into account at Regulation 18 and summary of key issues arising from any representations at Regulation 19. |
| 7 Independent Examination (Reg 24*) | An independent inspector will be appointed by the Secretary of State to consider the representations and the 'soundness' of the document. The Inspector will then prepare a report which may include any changes (Main Modifications) to be made to the Development Plan Document in order to make it 'sound'. |

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| | |
|----------------------|---|
| 8 Adoption (Reg 26*) | The Council may adopt the plan with the Inspector's Modifications or choose not to. |
|----------------------|---|

* These Regulations refer to 'The Town and Country Planning (Local Planning) (England) Regulations 2012' that came into force on 6 April 2012.

Duty to co-operate

The Government has introduced a 'Duty to Co-operate' through the Localism Act. The Council will work with neighbouring councils and other relevant organisations across authority boundaries on strategic planning issues that affect them all. They will engage constructively, actively and on an ongoing basis in the planning process.

The Council is required to demonstrate compliance with the 'Duty to Co-operate' as part of the examination of Local Plans. If a local council cannot demonstrate that it has complied with the duty, its local plan will not pass the independent examination.

Who will be consulted?

The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the legal requirements for consultation and public participation during the preparation of any planning policy documents.

Anyone who may have a role or interest in shaping the planning of Arun including residents, businesses, community groups, landowners, developers, and public sector organisations should have the opportunity to be involved in the preparation of documents that form part of the Arun Development Plan.

As part of the consultation process, the following groups will be consulted at various stages, in various forms:

- (i) General consultees
- (ii) Specific consultees
- (iii) Local consultees
- (iv) Hard to reach groups
- (v) Other Stakeholders

With respect to both the 'general & specific consultees', the legal requirements for such consultation are set out in 'The Town and Country Planning (Local Planning) (England) Regulations 2012'.

The Council recognises that a significant number of groups will have an interest in the Local Plan generally and this Statement of Community Involvement in particular. For this reason 'local groups' have been identified as a single entity in this document.

The Council will ensure that all sections of the community are involved in the Plan process, treated with fairness and respect and that their views are taken into account. The Equalities Act 2010 bans unfair treatment of people on the

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grounds of protected characteristics they may have or are alleged to have. It also introduces a public sector 'Equality Duty' (section 149) which requires the Council to consider how different people will be affected by its decisions and activities and 'specific duties', including to monitor and publish relevant information on fulfilling its duty.

Most plans policies and programmes are required to be subject to a Sustainability Appraisal (SA) which includes socio-economic impacts and mitigation. The Council's Equalities Impact Assessment is used to assess equalities impacts of its policies and programmes and any necessary mitigation. A health impact assessment (HIA) helps ensure that health and wellbeing are being properly considered in planning policies and proposals. All Plans will be screened to see if these assessments are required. Where possible, these assessments will be incorporated in to the SA process.

Appendix 1 identifies who the council will involve in the various planning policy documents (Local Development Documents) that it may prepare.

Throughout the Arun District there are wide differences in standards of living, with some of the most affluent but also some of the most deprived people in the country living here. Arun also has some of the best educated people in England and some in the bottom 10%. The district also has residents with the longest life expectancy in the South East, while others have the shortest. The Council will thereby use appropriate methods to engage with all sections of the community.

The Council maintains a database of all its 'consultees' which it reviews and updates. Any individual or organisation can request to be added to the database and notified of future consultations. This will be held in accordance with the General Data Protection Regulation (GDPR).

When we will undertake consultation

The regulations set out the various stages in the preparation process for each of the types of planning document and when we must formally publish the document for comment and for how long. These requirements will be met. However, we consider that there should be significant effort to engage people at the early stages of preparing planning documents, where there is greatest opportunity to influence policies and strategies.

The Local Development Scheme sets out the programme for plan preparation and provides a starting point for members of the public and stakeholders to find out which documents are being produced and the timetable for their production. The Local Development Scheme operates over a three year period and is available via the Councils website: www.arun.gov.uk.

Methods of consultation

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Arun District Council wishes to engage as many individuals and groups as possible in the Plan making process. Table 3 below identifies a series of consultation methods that the Council will consider using in this regard. The tables included in Appendix 2 clearly set out how the Council intends to undertake consultation, in an attempt to engage as many sections of society as possible in the Plan making process. Additional survey methods may also be used, depending on the type of Development Plan Document being prepared.

| Table 3 Consultation methods | |
|--|---|
| Advertising | <p><u>Newspapers and newsletters</u> The Council will advertise the various stages of the Development Plan Documents produced, in local newspapers and newsletters.</p> <p><u>Posters</u> Posters shall also be used at suitable locations e.g. community notice boards, local shops, supermarkets, train stations, bus stations and leisure centres.</p> <p><u>Press Releases</u> As a further advertising method, Arun District Council may inform the public of key stages in the planning process through press releases, either on local radio or in printed form.</p> <p><u>Arun Times</u> The Council magazine, 'Arun Times', is delivered to households in the district on a regular basis. It is used to inform the community of issues being discussed, as well as document production, and to raise the overall profile of the Local Plan. In the past, this has proven extremely useful in alerting the community to any forthcoming publications and updating individuals and groups of the results of consultation and involvement exercises.</p> |
| Web | <p>Websites and Social Media are a popular way of communicating planning issues to individuals and groups. The planning pages of the Arun District Council website will be regularly updated with all the latest planning developments and with opportunities for online consultation. Social media sites will also be used as appropriate.</p> |
| 'Objective' Consultation Software | <p>This is a tool that provides the user with a unique username and password which allows them to access and comment on 'live' consultation documents online.</p> |

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| | The user is able to provide comments on a specific paragraph or policy text being consulted on. |
| Letters and/ or Emails | Letters and/or emails shall be sent out to particular people and groups at particular stages of the Plan making process to advise of the publication of a consultation document. An overview of the document shall be provided and the locations at which any consultation documents can be viewed will be identified. |
| Presentations and/ or Public Meetings | When planning public meetings the Council will always make sure that the venues are accessible, not only in terms of public transport, but also in terms of access to the building itself. Timing can be difficult because different groups have different needs. The Council will try to ensure that meetings are held at a time when it is considered most people will be able to attend. |
| Stakeholder Engagement | The Council may consider it necessary to hold meetings/ workshops with particular individuals or groups of people, where it is considered that further information in relation to a particular topic could be gathered to better inform the plan making process. |
| Community Representatives | As part of the consultation process the Council will consider using community representatives and community networks including neighbourhood planning groups. |
| Unstaffed displays | This method is less resource intensive than some forms of consultation but will be limited to those individuals visiting the particular location. Displays will stay in each location for a number of days so that the largest number of people has the opportunity to view them. The display will then move on to other parts of the District. Publicity will be the key to getting a good attendance and there will be opportunities for individuals to respond, e.g. response postcards. |
| School Councils and/ or Youth Council | School Councils and the Arun Youth Council mirror the Council's own democratic processes. Arun Youth Councillors have a standing item on the agenda if they wish to report to Full Council Meetings. In presenting Development Plan Documents to the School Councils and/ or Youth Council it is hoped that the Council will be able to make the planning process interesting enough to encourage younger people particularly, to take an active part in Development Plan Document production. |
| Survey Methods | <p><u>Wavelength</u> This panel contains a representative sample of 1200 residents who the Council may involve in certain consultation exercises.</p> <p><u>One to one interviews</u> The Council will undertake one to one interviews at particular locations where it is considered that a particular</p> |

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| | category of society would otherwise perhaps not engage in the Plan making process. Such locations could include leisure centres, train stations, bus stations, shopping centres. |
| Consultation Documents (which may include Summary Leaflets) | <p>The Council will produce consultation documents and make them available at various locations <u>(including the Arun Civic Centre, Bognor Regis Town Hall and libraries within the district)</u>. Additionally, paper copies of the document, for which the Council reserves the right to charge, will be made available on request from the Arun Civic Centre's Reception. Where it is considered that the preparation of a summary document would assist, these may be made available. In addition, the following practice will be used as appropriate;</p> <ul style="list-style-type: none"> • Using a font size of at least 12 point, preferably 14 point • Using plain English • Using clear fonts such as Arial • Avoiding the use of italicised fonts • Using an even type spacing • Only justifying the left margins • Avoiding the use of a background image • Using diagrams that add to the clarity of the document <p>Summary leaflets may also be provided which can provide a useful 'quick step' approach to obtaining information on the relevant Development Plan Document.</p> |

Supplementary Planning Document (SPD) production will follow a slightly different process. This is highlighted in Table 4 below.

| Table 4 Consultation Methods involved at the various stages of the SPD Production | | | | | |
|--|---|---|---|-------------------------------|----------------|
| Stage | Informal Consultation | Formal | Consultation on draft SPD document | Report to Full Council | Adopted |
| SPDs | Discussions with Town and Parish Councils and Parish Meetings, and consultation with others stakeholders as | Report to <u>Local Plan Planning Policy</u> Sub Committee | Document sent to statutory and any general consultees the Council thinks will be affected by the document, the general public and Town and Parish | | |

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| | appropriate | | Councils | | |
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Specific Consultation Information

Consultation Database – The policy team maintains a consultation database which it uses to inform all interested individuals or organisation when a consultation is taking place provided that they have given their express consent for necessary details to be added and used for the purposes described and on the terms set out in a Privacy Notice, in accordance with the General Data Protection Regulation (GDPR 2018). Such information will only be retained in so far as to comply with the Councils data retention policies.

Consultation Documents - ~~Consultation documents may be made available in both paper and electronic formats.~~

During periods of public consultation, documents will be made available for viewing at the following locations between 08.45 – 17.15 (Monday to Thursday inclusive) and 08.45 – 16.45 on Fridays.

- (i) Arun Civic Centre, Maltravers Road, Littlehampton
- (ii) Bognor Regis Town Hall, Clarence Road, Bognor Regis

Paper versions of consultation documents will also be made available in all libraries throughout the District (during their normal opening hours), and electronic copies published on the Arun District Council website www.arun.gov.uk.

Consultation comments - The Council uses a piece of electronic consultation software (Objective) which enables any interested party to provide their representation on line. This is the Councils preferred method of receiving representations and representors are strongly encouraged to use this method because it will greatly speed up, and increase accuracy in capturing people's representations, thus saving time in processing. Anyone can provide comments on a planning policy document, however we cannot accept confidential or anonymous comments

Hard copy response forms will also be provided in an electronic format so that copies can be emailed or printed off and posted to the Council.

The Council will also accept letters/emails which have been received by the close of the relevant consultation period although submitting comments via the Objective consultation portal will be encouraged.

All representations submitted via the consultation software and by email will automatically receive an acknowledgement.

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Consultation duration - As a general rule, consultation shall take place for a minimum of six weeks for Development Plan Documents and four to six weeks for Supplementary Planning Documents.

The timescales involved for receipt of representations with respect to the various Development Plan Documents will be clearly advertised using the following media sources;

- (i) West Sussex Gazette
- (ii) The Littlehampton Gazette
- (iii) The Bognor Regis Observer
- (iv) The Council's own magazine 'Arun Times' (if timetabling permits)
- (v) www.arun.gov.uk

The closing dates and times for receipt of representations shall be strictly adhered to and no representation shall be accepted after the deadline has passed.

Consultation Analysis - At the end of each period of consultation in accordance with plan making regulations, a schedule summarising any representations will be made, and any actions that the Council proposes to take or where required a summary of the key issues. This will be reported and considered by the Council and made available for inspection on the Council's website (when available).

How do I get involved?

Any person or group, who would like to get involved in the Plan making process as outlined above, can enter their details directly onto the consultation software (Objective), or request that their details be added to the Policy consultation database (in accordance with the GDPR requirements) by contacting the Planning Policy and Conservation Team.

Neighbourhood Development Plans

Neighbourhood Development Plans (NDP)

The Localism Act 2011 has reformed the planning system to give local people new rights to shape the development of the communities in which they live. There is no compulsion for parishes to prepare a Neighbourhood Development Plan (NDP), however there are a number of benefits to having one:

- It will help a community play a greater role in shaping the future of its surrounding area.
- It will bring together local residents, businesses, local groups, landowners and developers to share ideas and build consensus about what needs to be done within the local community. It can also build relationships between the local community and service providers.
- Neighbourhood planning offers communities the opportunity to set priorities for planning within their area.
- Areas with 'made' (adopted) Neighbourhood Development Plans will also be entitled to a larger share of any Community Infrastructure Levy to put towards infrastructure projects in the area.

Neighbourhood Development Plans will set out the vision for an area and the planning policies for the use and development of land within a parish or neighbourhood area. The policies within a Neighbourhood Development Plan are intended to support the strategic policies within the Arun Local Plan, and should focus on guiding development, rather than stopping it.

In a parished area like Arun District it is usually the Parish or Town Council who is the qualifying body to prepare a Neighbourhood Development Plan. It can cover all or part of the parish and in some cases may involve a number of parishes. In some areas residents associations or other bodies e.g. businesses may be interested in drawing up a Neighbourhood Plan and act as a forum; however this will need to be carried out with the Parish/Town/City Council who initiate and support the project.

Plans will need to conform to planning policies and guidance at a local, national and European level and meet the Neighbourhood Planning Regulations. This will be tested in an independent examination. They will also need to demonstrate involvement of the local community, including engagement and periods of statutory consultation. Those statutory consultation requirements are stipulated in the regulations.

The parish should publish the draft plan locally for a minimum period of six weeks (Reg.14) in order for any representations to be made. Consultation must also be made with specified consultees bringing it to the attention of anyone who it may affect. When the final plan is submitted to Arun District Council, it will publish the plan for a minimum six week consultation (Reg.16)

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period bringing it to the attention of all those consulted at Reg.14 plus any others it deems necessary. Following conclusion of the consultation, the plan will progress to an independent examination.

The examiner makes a report which will recommend either:

1. The plan can move to a referendum
2. Following a few minor amendments the plan can move to a referendum
3. The plan should be refused

Once a NDP has successfully passed referendum it will come into effect as a statutory plan (as set out in the Planning Practice Guidance (PPG) even though it remains to be made through a Council decision.

A decision statement will be produced by Arun District Council, outlining its' decision with reasons, identifying where the statement can be inspected and any modifications made to the plan. The examiner's report and the Council's decision will be published on the website.

Once the plan is finalised and any amendments have been made, it will then be subject to a community referendum. Arun District Council will arrange and fund the referendum. This will include all those on the electoral roll within the designated Neighbourhood Development Plan area. This may also include those from neighbouring parishes if the Examiner has deemed it will also affect them directly.

If the referendum result returns in favour by 50% of responses or more, then the Neighbourhood Development Plan will move on to the final stage in the process to be 'made' (adopted).

Once a plan has been 'made' (adopted), it will become a Statutory Plan to be used by Arun District Council in making decisions on planning applications in the Neighbourhood Plan area.

'Made' (adopted) plans will be published on the Council's website and notification of the decision to 'make' (adopt) the plan will be sent to the parishes and any person asking to be notified.

The Council will seek to provide support and advice on a range of issues, including consultation and the process of document production. Further information on this can be found on the Council's website at <https://www.arun.gov.uk/neighbourhood-planning>

Community Right to Build Order (CRBO)

The 'Community Right to Build Order' enables community organisations to progress new local developments without the need to go through the normal planning application process, as long as the proposals meet certain criteria and there is community backing in a local referendum. Communities may wish

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to build new homes or new community amenities, and providing they can demonstrate overwhelming local support, the 'Community Right to Build Order' will give communities the powers to deliver this directly. All profits derived from a Community Right to Build Order proposal must be used for the benefit of the community, for example to provide and maintain local facilities such as village halls. The production process and bringing it into force is the same as it is for NDPs.

Neighbourhood Development Order

A Neighbourhood Development Order allows communities to grant planning permission for development they want to see go ahead in a neighbourhood. For example, it enables them to allow certain developments, such as extensions to houses, to be built without the need to apply for planning permission.

DEVELOPMENT MANAGEMENT

Introduction

A planning application is the means by which an individual/organisation applies for permission from the Council to develop land/buildings. Arun District Council is responsible for planning decisions that are made throughout the Local Planning Authority Area and receives different types of applications/consents for formal determination.

The requirements for consulting on planning applications are set out in the Town and Country Planning (Development Management Procedure) Order 2015.

The planning application process has four key stages, which will be discussed in more detail in the remainder of this chapter:

- **Pre-application** – a developer prepares the development proposal. Early engagement with the Council and community is encouraged.
- **Planning application** – an application is submitted to the Council who will consult on the planning application.
- **Decision making** – a decision is made by a planning committee or may be delegated to a planning officer.
- **Appeals** – the applicant has a right to appeal where they disagree with the decision of the Council to refuse permission. An independent Planning Inspector will review the application/decision.

The Statement of Community Involvement is an important tool for involving the wider community on all planning applications dealt with by the Local Planning Authority.

Pre-application Consultation

The need for wider involvement of the community and stakeholders at an early stage in the development management process is of benefit to the public, local groups and organisations, developers and local authorities.

Arun District Council offers a Pre-Application advice service for proposals that require planning permission. This enables prospective planning applicants to gauge planning issues prior to submitting a formal application. Availing of this service allows the subsequent determination of planning decisions to be undertaken more efficiently, effectively and expeditiously.

Pre-application advice offers a number of benefits including the following:

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- It provides an opportunity for developers to understand how planning applications will be judged against relevant policies and guidance
- It identifies any modifications which may be necessary for the proposed development at the earliest possible stage
- It identifies where there is a need for additional information or specialist consultation

Fees

For pre-application enquiries there are varying charges for different categories of development dependent upon type and sizes. A schedule of pre-application charges is provided on the Council's website at www.arun.gov.uk.

How can I use the pre-application advice service?

The pre-application enquiry form can be downloaded from the Council's website www.arun.gov.uk. While it is not essential to provide formal plans, the more information that is provided (as detailed on the form), the better informed the Council's responses will be. Sketch plans with dimensions will suffice for household and other categories of development. For large development proposals plans and drawings will be extremely useful. Photographs of the proposed development site along with photographs of other similar developments, where possible, should be provided.

Pre application proposals must be accompanied by the correct fee and can either be posted (with the relevant fee) to the Council, or made on-line using the Council's website.

What service will I receive?

From the date of receipt of an enquiry with the correct fee, the applicant will be contacted by letter and given details of the Case Officer within five working days. The Case Officer will assess the enquiry, undertake a site visit and endeavour to give a written response within the following 20 working days. In the case of largescale major developments however, a written response may take up to 30 working days (and possibly longer with the agreement of the applicant).

The written response of the Case Officer will outline information such as:

- the planning history of the site
- all relevant policies
- internal consultee advice
- recommended contact list of external consultees
- Officer's opinion on the acceptability of the development proposal (**such advice does not constitute approval**)
- checklist of information to be submitted with a planning application

For largescale major (residential/commercial) and small scale major (large residential) developments, a meeting will be arranged prior to the receipt of

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the written response. There will be no additional charge for this service. For all other categories of development a meeting may be arranged following a written response from the Council. There is however, an additional charge for this service.

Planning applications

Publicity for planning applications

The Council is required to undertake a formal period of public consultation before determining a planning application. These requirements are set out in Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. There are separate arrangements for listed buildings which are set out in Regulation 5 and 5a of the Listed Buildings and Conservation Area Regulations 1990 (as amended).

Interested parties will have a minimum of 21 days to make representations from the registration of the application. Comments received after the date given for consultation will not be considered.

Planning applications will be publicised by:

- A site notice displayed in at least one place on or near the development site for at least 21 days. The site notice will set out how to comment on the application, and
- An advertisement in a local newspaper - in accordance with statutory requirements applications are advertised in the local press; this is known as the weekly list; and
- A weekly list of applications available to view both at the Civic Centre, Littlehampton and on-line at www.arun.gov.uk.

Relevant statutory consultations will be undertaken. Parish Councils are consulted on current applications within their respective areas, and are informed that all documents relating to the application are available on the Arun District Council website. The 21 days consultation period still applies.

All consultation responses and comments will be included in the Case Officer's report. Material considerations raised in responses will be reviewed and may contribute to the decision making process together with all other known material considerations.

How to view an application

Applications can be viewed on the Council's online planning register. Anyone can request a search for a particular type of application, via an address or a parish.

Item 6 – Appendix 1**How to comment on an application**

Anyone can comment on a planning application; however we cannot accept confidential or anonymous comments. Comments for current applications can be submitted online via our website www.arun.gov.uk, by email to planning@arun.gov.uk or by post. Comments must be submitted within the 21 day deadline.

Please quote the planning application reference number in all correspondence. Further information on how to comment on planning applications is available on the Arun District Council website.

If you submit your comments online, using the online planning register, you can track the application. If you submitted your comments in writing, you will receive an acknowledgement.

Decision Making

Following the end of the consultation period, the council will consider any comments received and make a decision on the planning application having regard to the development plan policies and other material planning considerations.

Most applications are dealt with under ‘delegated’ powers where a decision is made by a planning officer. However, some applications are referred to the Development Control Committee for determination by elected members. The operation of the Council’s planning services is controlled through the Constitution.

Neighbourhood Development Plans

Decisions on planning applications must be made in accordance with the development plan, including made Neighbourhood Plans (where these exist), unless other material considerations indicate otherwise.

Planning application decision notices

Following a decision on an application, the decision is sent to the applicant/agent advising them of the decision that has been made. This includes any details of conditions imposed if the application has been approved.

All those who make a representation on planning applications will be written to, informing them of the decision on the application. Decision notices can also be viewed on the Council’s website, as part of the planning file.

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Appeals

The applicant has a right to appeal where they disagree with the Council's decision to refuse planning permission, to condition a planning permission or where a decision is not reached within the statutory time period.

Appeals are determined by the Planning Inspectorate or in cases of significant national importance, by the Secretary of State. There are different time limits to make an appeal depending on the type of appeal and the circumstances.

Once we have been notified of an appeal by the Planning Inspectorate, we will notify all interested parties, including those who submitted comments on the application. We will provide a copy of all the comments received to the Planning Inspectorate. Interested parties will be advised of how they can be involved in the appeal process.

If an appeal is to be considered at an informal hearing or public inquiry, the Council will also notify all interested parties of the venue and time of the hearing in accordance with the Planning Inspectorate's requirements.

The Inspector will make a decision to dismiss or allow the appeal, or send a report to the Secretary of State. A copy of the decision notice will be sent to the appellant, the Council and any interested person who has requested a copy.

Developer/Agent/Promoter Consultation

The Council recommends that developers adopt at least one of the consultation methods listed in Table 5 below in advance of submitting planning applications for both minor and major applications. The type and nature of this consultation however will vary depending on the complexity and scale of the development proposed. The appropriate level of consultation will be discussed with the applicant at the pre-application meeting.

It should be noted that the Council can only request that applicants carry out pre-application consultation. The Council cannot refuse to accept planning applications because an applicant has not undertaken pre-application consultations. However the submission of a planning application following pre-application advice will ensure that it receives priority checking. Detailed pre-application guidance notes are available for viewing on the Council's website at www.arun.gov.uk.

| Table 5 Pre Application consultation methods | | |
|--|---------------------------|---------------------------|
| Approach | Major Applications | Minor Applications |
| Public meetings – on more controversial schemes, a wider audience can debate and | ✓ | |

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| | | |
|---|---|---|
| discuss proposals | | |
| Public exhibitions – exhibitions held locally to the proposal can provide information and raise interest | ✓ | |
| Workshops – allow stakeholders and community groups to discuss in detail particular issues at an early stage of a development proposal. Professional independent facilitators may be considered as part of this process. | ✓ | |
| Planning for Real – uses simple models as a focus for people to put forward and prioritise ideas on how their area can be improved | ✓ | |
| Town & Parish Councils – important way of raising interest locally and provides access to a network of local community groups | ✓ | ✓ |
| Media – radio and local press can enable a wide audience to be reached. Documents and processes can be explained in simple, appropriate language | ✓ | ✓ |
| Mail drop – this would provide communities with information on proposed future involvement events | ✓ | |
| Street survey questionnaires – important method of obtaining the views of individuals or groups that would otherwise be difficult to obtain e.g. full time employed at transport nodes and leisure centres | ✓ | |
| Specialist community involvement consultant - this should be considered in order to devise overall strategy and run specific events | ✓ | |
| Notify neighbours – this can address concerns early on in the process and applications may be revised having regard to legitimate concerns raised | ✓ | ✓ |
| Website – all relevant documents can be provided online through dedicated web pages facilitated by the Council or applicant, keeping residents informed of consultation events etc. This method may also include web based questionnaires | ✓ | ✓ |

It is envisaged that any legitimate concerns raised as part of the undertaking of the pre-application consultation methods outlined above would then inform planning applications.

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Planning Performance Agreements

A Planning Performance Agreement (PPA), is a project management tool which the local planning authority and applicants can use to agree timescales, actions and resources for handling particular applications. It should cover the pre-application and application stages but may also extend through to the post-application stage.

Arun District Council use the agreements as a more effective mechanism for handling planning applications for large, complex development projects (www.pas.gov.uk & www.atlasplanning.com).

A fundamental principle of PPA's is the front loading of activity, prior to submission of the planning application to ensure that applications are of a high quality, both in terms of the material submitted and the content of the proposal.

Planning Performance Agreements provide an ideal opportunity for identifying the preferred approach to community engagement, including the identification of the communities to involve, the process of engagement and the best approach to incorporating their views. **It should be noted that that PPAs are not taken by the applicant, or others, as support for the application before a decision is made.**

Arun District Council has a specific Strategic Planning Applications Team that solely assesses larger applications. The PPA process can only work effectively however, where there is co-operation on both sides i.e. on the part of the Council and the developer.

Planning Aid

Introduction

South East Planning Aid is a voluntary service linked to the Royal Town Planning Institute (RTPI) which offers free independent and professional advice on planning issues. Planning Aid is aimed at community groups and individuals who have limited resources to participate effectively in planning matters.

What type of service is provided by Planning Aid?

The current remit of Planning Aid involves advising community groups in negotiations with the Local Planning Authority, and, if necessary, representing the groups at examination. The Government is promoting the expansion of this service.

Every part of the UK is covered by Planning Aid with each region having its own service. The use of Planning Aid for advice as to appropriate engagement techniques should be considered by developers. Further information regarding contact details etc. can be found on the RTPI website www.rtpi.org.uk/planningaid/.

In addition to Planning Aid, information about the planning system can also be found on the Government planning portal website www.planningportal.gov.uk.

Monitoring and review of the Statement of Community Involvement

Introduction

In order to improve the service that Arun District Council provides to the public, it is proposed to monitor community involvement and engagement as part of both planning policy and development management practices.

It is the intention of the Council to monitor the consultation methods contained in this Statement of Community Involvement through the Authority Monitoring Report. As the success of community involvement techniques are monitored and reviewed, the results will inform the preparation of future planning policy documents and the consideration of planning applications.

Monitoring and Planning Policy

While it is difficult to monitor the effectiveness of certain consultation methods proposed as part of this Statement of Community Involvement such as newspaper advertisements it is proposed to monitor the effectiveness of the following methods in the following ways:-

| | |
|-------------------------------------|---|
| Web | <p>Calculate the number of 'hits' on the Local Plan webpage during consultation periods.</p> <p>Include a note on the home page to advise the public that the Council offers a translation service should anyone wish to use this facility. Contact details of the appropriate person would also be provided.</p> <p>Use a pop up 'survey' window to determine the following information</p> <ul style="list-style-type: none"> (i) on a scale of 1-5 how useful did the user find the web page? (ii) how could the information provided or presented be improved? (iii) which group does the user belong to? (Refer to Appendix 1 for list of groups) |
| Letters & emails | Compare number of responses to numbers of letters and emails issued. |
| Presentations, meetings & workshops | <p>Provide a 'sign in' book to determine number of attendees at each venue.</p> <p>Carry out a survey on location to determine the following:</p> <ul style="list-style-type: none"> (i) was the chosen venue appropriate? (ii) was the venue accessible? |

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| | |
|--|---|
| | <ul style="list-style-type: none"> (iii) was the time chosen for consultation at the venue suitable? (iv) were there appropriate levels of staff present at the venue? (v) how did the interviewee hear about this consultation session? (vi) were the consultation documents easy to understand? |
|--|---|

Monitoring and Development Management

It is proposed that a proportion of all applicants who attend pre-application consultation complete a questionnaire at the end of the consultation sessions to determine the following;

- (i) type of application being discussed
- (ii) waiting times for consultation
- (iii) whether the advice given at the consultation session will result in changes to the proposed application

Reviewing the Statement of Community Involvement

We have endeavoured to make the Statement of Community Involvement flexible enough to deal with changing circumstances. It should only be necessary to revise the document where:-

- (i) there have been significant changes in national planning policy
- (ii) additional hard-to-reach groups have been identified
- (iii) lessons have been learnt from previous activities and new best practice has emerged

Abbreviations

| | |
|-------------|------------------------------------|
| AMR | Annual Monitoring Report |
| CA | The Countryside Agency |
| DC | Development Control |
| DPD | Development Plan Document |
| EA | The Environment Agency |
| HE | Historic England |
| HE | Highways England |
| LDD | Local Development Document |
| LDF | Local Development Framework |
| LDS | Local Development Scheme |
| LPA | Local Planning Authority |
| LSP | Local Strategic Partnership |
| LTP | Local Transport Plan |
| OS | Ordnance Survey |
| PPG | Planning Policy Guidance |
| PPS | Planning Policy Statement |
| RTPI | Royal Town Planning Institute |
| SA | Sustainability Appraisal |
| SEA | Strategic Environmental Assessment |
| SCI | Statement of Community Involvement |
| SOS | Secretary of State |
| SPD | Supplementary Planning Document |
| SRA | Strategic Rail Authority |

Glossary of Terms

Annual Monitoring Report - This report looks at the implementation of the Local Development Scheme and how well the policies in the Local Development Documents are being achieved.

Area Action Plan - Area Action Plans are a type of Development Plan Document. These are used to provide a planning framework for areas of change or conservation.

Development Plan – As set out in section 38(6) of the Planning and Compulsory Purchase Act, an area's development plan consists of the relevant Development Plan Documents comprising a Strategic or Local Plan and Neighbourhood Plans.

Development Plan Documents – All Unitary/District/Borough Authorities must produce Development Plan Documents. These documents include the Strategic Plan, Local Plan, Site Allocations and Development Management Policies, Policies Map and Area Action Plans (where required). These are spatial documents and are subject to independent examination. There will be a right for anyone to make representations seeking change and to request to be heard at an independent examination.

Local Community – A generic term which includes all individuals (including the general public), businesses and organisations external to the District Council. It includes the statutory and other consultees.

Local Development Scheme – This document sets out the timetable for the preparation of the Local Development Documents. It identifies which Development Plan Documents and Supplementary Planning Documents are to be produced and when.

Local Plan A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Policies Map – The adopted Policies Map illustrates all of the policies and proposals in the Development Plan Documents and any saved policies that are included in the Local Plan.

Site Allocations – These are allocations for specific or mixed uses or development contained in Development Plan Documents. The policies in the document will identify any specific requirements for individual proposals.

Stakeholders - Stakeholders include any person or organisation, local or national, who have a legitimate interest in what happens in our area.

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Statement of Community Involvement – This Statement of Community Involvement is Arun District Council’s formal policy to identify how and when local communities and stakeholders will be involved in the preparation of the documents to be included in the Arun District Local Plan. The Statement also deals with the planning applications that Arun District Council is responsible for determining.

Strategic Environmental Assessment – The European ‘SEA Directive’ (2001/42/EC) requires a formal ‘environmental assessment’ of certain plans and programmes, including those in the field of planning and land use.

Supplementary Planning Documents – These documents provide supplementary information to the policies in the Development Plan Documents. They do not form part of the Development Plan and are not subject to independent examination.

Sustainability Appraisal – Sustainability Appraisal is a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, economic and environmental factors). It is required under the Planning and Compulsory Purchase Act 2004 to be carried out on all Development Plan Documents and Supplementary Planning Documents where necessary.

Sustainable Community Strategy – The Local Government Act 2000 requires Local Authorities to prepare a Sustainable Community Strategy in conjunction with other public, private and community sector organisations. Sustainable Community strategies should promote the economic, social and environmental wellbeing of their areas and contribute to the achievement of sustainable development. A copy of Arun’s Sustainable Community Strategy (‘Our Kind of Place’) can be viewed on the Arun District Council website at: www.arun.gov.uk/lsp

APPENDIX 1 - Who we will involve in each Plan document

| Who we will involve | Local Plan Documents | | | | | | | |
|---|------------------------------------|--------------------------|---------------------------|---|------------------------------------|-----------------------------------|--------------------------|------------|
| | Statement of Community Involvement | Local Development scheme | Strategic and Local Plans | Site Allocations and Development Policies | Area Action Plans (where required) | Supplementary Planning Documents. | Annual Monitoring Report | SEA/SA/HRA |
| GENERAL CONSULTEES | | | | | | | | |
| Voluntary bodies some or all of whose activities benefit any part of the authority's area | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Bodies which represent the interests of different racial, ethnic or national groups in the authority's area | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Bodies which represent the interests of different religious groups in the authority's area | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Bodies which represent the interests of disabled persons in the authority's area | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Bodies which represent the interests of persons carrying on business in the authority's area | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| SPECIFIC CONSULTEES | | | | | | | | |
| The Coal Authority | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| West Sussex County Council | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Chichester District Council | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Worthing Borough Council | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Adur District Council | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| South Downs National Park Authority | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Town and Parish Councils and Parish meetings both within and adjoining Arun District | ✓ | | ✓ | ✓ | ✓ | ✓ | | |

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|--|---|--|---|---|---|---|---|---|
| The Highways Agency Highways England | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Network Rail Infrastructure Ltd (Company No. 2904587) | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| The Marine Management Organisation | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Police Authority | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| The Environment Agency (EA) | ✓ | | ✓ | ✓ | ✓ | ✓ | | ✓ |
| Natural England | ✓ | | ✓ | ✓ | ✓ | ✓ | | ✓ |
| Heritage Historic England | ✓ | | ✓ | ✓ | ✓ | ✓ | | ✓ |
| Relevant telecommunications companies | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Primary Care Trust and CCG | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Relevant electricity and gas companies | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Relevant sewerage and water undertakers | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Homes England | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| LOCAL | | | | | | | | |
| Local residents | ✓ | | ✓ | ✓ | ✓ | ✓ | ✓ | |
| In addition to local residents, we will consider consulting the following bodies where we think it is appropriate; | | | | | | | | |
| Community representatives | | | | | | | | |
| Residents associations | | | | | | | | |
| Local amenity societies | | | | | | | | |
| Local landowners | | | | | | | | |
| Housing associations Registered Providers | | | | | | | | |
| HARD TO REACH | | | | | | | | |
| Younger people/ groups representing younger people | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| People with disabilities / groups representing the disabled | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| People with learning difficulties | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Older people | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| 20 – 50 year age category | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Rural communities/ groups representing rural communities | ✓ | | ✓ | ✓ | ✓ | ✓ | | |

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|--|---|--|---|---|---|---|--|--|
| Minority ethnic groups/ groups representing minority ethnic groups | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Groups with Protected Characteristics as set out under the Equalities Act and Equalities Duty 2010 | | | ✓ | ✓ | ✓ | ✓ | | |
| Businesses | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Gypsies and travellers | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| | | | | | | | | |
| General public | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Regional health bodies | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Conservation & environmental groups | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Transport companies and bodies | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Rural and countryside | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Land and property interests | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Business organisations | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Education, learning and skills | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Retail and town centre | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Tourism interests | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Land owner and developer interests | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| Local Strategic Partnership | ✓ | | ✓ | ✓ | ✓ | ✓ | | |
| All those currently included on the LDF consultation database | ✓ | | ✓ | ✓ | ✓ | ✓ | | |

✓ Depending on the subject matter of the Planning Document

APPENDIX 2 – Consultation Methods

Consultation Methods involved at the various stages of the Development Plan Document Production (Please read these Tables with Appendix 1)

(a) REGULATION 18 CONSULTATION

| Target Group | Method of Consultation* | | | | | | | | | |
|--|-------------------------|-----|--------------------------|---------------------------------------|----------|---------------------------|--------------------|---------------------------------------|----------------|--|
| | Advertising | Web | Letters and/ or Emails** | Presentations and/ or Public Meetings | Meetings | Community Representatives | Unstaffed displays | School Councils and/ or Youth Council | Survey Methods | Consultation Documents (which may include Summary Leaflets)*** |
| Specific Consultees | | | ✓ | | | | | | | ✓ |
| General Consultees | | | ✓ | | | | | | | ✓ |
| Local | ✓ | ✓ | ✓ | ✓ | | | | | ✓ | ✓ |
| Hard to Reach | | | | | | | | | | |
| Younger people/ groups representing younger people | ✓ | ✓ | ✓ | ✓ | | | | ✓ | ✓ | ✓ |
| People with disabilities/ groups representing the disabled | ✓ | ✓ | ✓ | ✓ | | | ✓ | ✓ | ✓ | ✓ |
| People with learning difficulties | ✓ | ✓ | | | | ✓ | | | ✓ | ✓ |
| Older people | ✓ | ✓ | | ✓ | | | ✓ | | ✓ | ✓ |
| 20-50 year age category | ✓ | ✓ | | ✓ | | | ✓ | | ✓ | ✓ |

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|---|---|---|---|---|---|---|---|--|---|---|
| Rural communities/ groups representing rural communities | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | | ✓ | ✓ |
| Minority ethnic groups/ groups representing minority ethnic groups | ✓ | ✓ | ✓ | ✓ | | ✓ | ✓ | | ✓ | ✓ |
| Groups with Protected Characteristics as set out under the Equalities Act and Equalities Duty 2010 | ✓ | ✓ | | | | ✓ | ✓ | | ✓ | ✓ |
| Businesses | ✓ | ✓ | ✓ | ✓ | ✓ | | ✓ | | ✓ | ✓ |
| Other Stakeholders | ✓ | ✓ | ✓ | ✓ | | | ✓ | | ✓ | ✓ |

*The methods of consultation as outlined in this Table are a guide and will be used as deemed appropriate and necessary, depending on the type of consultation document being consulted upon at the time and taking into account people's preferences.

** Letters and/or emails shall be forwarded to those who are currently included on Arun District Council's consultation database. The database comprises all those people/organisations who have supplied name, address and email details and asked to be kept informed of the LDF process. Should you wish to be included on this database you must inform the Planning Policy Team by email or in writing (see Section 7.1 for details). The Planning Policy Team will update the consultation database on a continual basis. However, where a particular consultation event has already commenced it may not be expected that new entries to the consultation database will be informed of a consultation that is ongoing at that time.

*** Electronic copies of consultation documents will be available on the Council's website, public libraries throughout the District and the District Council offices and should be used for reference in the first instance. Where this is not possible, alternative mediums may be made available on request. This may incur a charge.

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(b) PUBLICATION OF PRE-SUBMISSION DOCUMENT

| Target Group | Method of Consultation* | | | | | | | | | | |
|--|-------------------------|-----|--------------------------|---------------------------------------|----------|---------------------------|-----------|--------------------|---------------------------------------|----------------|--|
| | Advertising | Web | Letters and/ or Emails** | Presentations and/ or Public Meetings | Meetings | Community Representations | Workshops | Unstaffed displays | School Councils and/ or Youth Council | Survey Methods | Consultation Documents (which may include Summary Leaflets)*** |
| Specific Consultees | | | ✓ | | | | | | | | ✓ |
| General Consultees | | | ✓ | | | | | | | | ✓ |
| Local | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |
| Hard to Reach | | | | | | | | | | | |
| Younger people/ groups representing younger people | ✓ | ✓ | ✓ | | | | | ✓ | ✓ | | ✓ |
| People with disabilities/ groups representing the disabled | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |
| People with learning difficulties | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |
| Older people | ✓ | ✓ | | | | | | ✓ | | | ✓ |
| 20-50 year age category | ✓ | ✓ | | | | | | ✓ | | | ✓ |
| Rural communities/ | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |

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|--|---|---|---|--|--|--|--|---|--|--|---|
| Groups representing rural communities | | | | | | | | | | | |
| Minority ethnic groups/ groups representing minority ethnic groups | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |
| Groups with Protected Characteristics as set out under the Equalities Act and Equalities Duty 2010 | ✓ | ✓ | | | | | | ✓ | | | ✓ |
| Businesses | ✓ | ✓ | ✓ | | | | | ✓ | | | ✓ |
| Other Stakeholders | | | ✓ | | | | | | | | ✓ |

*The methods of consultation as outlined in this Table are a guide and will be used as deemed appropriate and necessary, depending on the type of consultation document being consulted upon at the time and taking into account people's preferences..

** Letters and/or emails shall be forwarded to those who are currently included on Arun District Council's consultation database. The database comprises all those people/organisations who have supplied name, address and email details and asked to be kept informed of the LDF process. Should you wish to be included on this database you must inform the Planning Policy Team by email or in writing (see Section 7.1 for details). The Planning Policy Team will update the consultation database on a continual basis. However, where a particular consultation event has already commenced it may not be expected that new entries to the consultation database will be informed of a consultation that is ongoing at that time.

*** Electronic copies of consultation documents will be available on the Council's website, public libraries throughout the District and the District Council offices and should be used for reference in the first instance. Where this is not possible, alternative mediums may be made available on request. This may incur a charge.

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(c) EXAMINATION AND SUBMISSION

| Target Group | Method of Consultation* | | | | |
|--|-------------------------|-----|--------------------------|-------------|---|
| | Advertising | Web | Letters and/ or Emails** | Meetings*** | Consultation Documents (which may include Summary Leaflets)**** |
| Specific Consultees | ✓ | ✓ | ✓ | | ✓ |
| General Consultees | ✓ | ✓ | ✓ | | ✓ |
| Local | ✓ | ✓ | ✓ | | ✓ |
| Hard to Reach | | | | | |
| Younger people/ groups representing younger people | ✓ | ✓ | ✓ | | ✓ |
| People with disabilities/ groups representing the disabled | ✓ | ✓ | ✓ | | ✓ |
| People with learning difficulties | ✓ | ✓ | ✓ | | ✓ |
| Older people | ✓ | ✓ | ✓ | | ✓ |
| 20-50 year age category | ✓ | ✓ | ✓ | | |
| Rural communities/ groups representing rural communities | ✓ | ✓ | ✓ | | ✓ |
| Minority ethnic groups/ groups representing minority ethnic groups | ✓ | ✓ | ✓ | | ✓ |
| Groups with Protected | ✓ | ✓ | | | ✓ |

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|--|---|---|---|--|---|
| Characteristics as set out under the Equalities Act and Equalities Duty 2010 | | | | | |
| Businesses | ✓ | ✓ | ✓ | | ✓ |
| Other Stakeholders | ✓ | ✓ | ✓ | | ✓ |

*The methods of consultation as outlined in this Table are a guide and will be used as deemed appropriate and necessary, depending on the type of consultation document being consulted upon at the time and taking into account people's preferences.

** Letters and/or emails shall be forwarded to those who are currently included on Arun District Council's consultation database. The database comprises all those people/organisations who have supplied name, address and email details and asked to be kept informed of the LDF process. Should you wish to be included on this database you must inform the Planning Policy Team by email or in writing (see Section 7.1 for details). The Planning Policy Team will update the consultation database on a continual basis. However, where a particular consultation event has already commenced it may not be expected that new entries to the consultation database will be informed of a consultation that is ongoing at that time.

***A meeting during the stage of the plan making process may be held with the Inspector at his/her request

**** Electronic copies of consultation documents will be available on the Council's website, public libraries throughout the District and the District Council offices and should be used for reference in the first instance. Where this is not possible, alternative mediums may be made available on request. This may incur a charge.

**Item 6 - Appendix 2 - Arun District Council Statement of Community Involvement Consultation
Summary of Consultation Responses and Council Response**

Proposed amendments are highlighted in yellow and underlined.

| Consultee | Representation | Outcome |
|---------------|--|--|
| A. J. Allison | <p>Page 16 - How do I get involved?</p> <p>How does a resident get on to the consultation database?</p> | <p>Noted. It is agreed that the information in this paragraph could be clarified. It is recommended that the paragraph related to 'How do I get involved?' is amended as follows:</p> <p>Any person or group, who would like to get involved in the Plan making process as outlined above, can enter their details directly <u>onto the consultation software (Objective)</u>, or request that their details be added to the Policy consultation database <u>(in accordance with the GDPR requirements) by contacting the Planning Policy and Conservation Team.</u></p> |
| | <p>Page 22</p> <p>The site notice should be posted to all properties with a common boundary to the planning application and posted on all Parish Notices This is because in rural areas posters are often displayed wrapped round a post or a tree in a location where they are difficult to read e.g. on a road with no path or a rarely used path, and at a height which makes it difficult to read from ground level. All changes to Applications must be</p> | <p>Noted. A site notice is displayed for all applications. In some cases multiple copies of the notice are displayed in order to ensure that local residents have enough opportunity to be made aware that there is a planning application on a particular property. Resource levels means that it is not possible to post to all properties affected, or updated if plans</p> |

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| | followed by new posters identifying the changes to the original Notices. | are amended. |
| | The weekly list relevant to the parish should be posted on the Parish Council website and displayed on the Parish Councils Notice Boards | Noted. However, this is an issue for the Town and Parish Councils, and the district council cannot force them to undertake this action. No change |
| | Reasons should be given on the Arun website for decision date being passed. | Noted. Unfortunately, resources are not available to introduce such a system. No change |
| | Page 22 - How to view an application All comments shall be treated to the same standard as the Applicants i.e. if in colour to a high standard and not scanned in grey. | Noted. However, this is a resource issue, and no amendment is required to the SCI. |
| | Page 24 – Appeals There has been in the past delay in providing the Appellants latest proposals on the website thus reducing time for comment. | Noted. However, this is a resource issue, and no amendment is required to the SCI. |
| | | |
| Highways England | Having examined the Draft Revised Statement of Community Involvement (SCI), we are satisfied that its policies will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 32). Accordingly, Highways England does not offer any comments on the consultation at this time | Noted. No amendment required |
| | | |
| Littlehampton Town Council | Page 13 - Presentation and /or public meetings – perhaps prepare podcasts which summarise the issues and can be | Noted. However, the use of podcasts is considered to be resource intensive. The |

| | | |
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| | broadcast by Parishes and community groups. | council attempt to publish all available information such as minutes and presentations where possible. No amendment required. |
| | Additional point on consultation methods. "survey residents in new developments after occupation to see if lessons need to be learnt and to learn more about travel patterns etc." | Noted. The intention of the SCI is to involve the community and relevant stakeholders during the decision making process. This suggestion relates more to developments when constructed. The suggestion will be passed on to the relevant officer. No amendment required. |
| | Page 14: Consultation documents. Reserving the right to charge for paper copies is not ensuring equality of opportunity to access the documentation. | Noted. However, the cost of producing some of the consultation documents means that the council may have to make a charge in order to cover the costs of printing and postage. No amendment required. |
| | Page 15 Consultation documents 'consultation documents may - should be WILL- be made available in both paper and electronic formats. | Noted. it is considered that the first paragraph of text related to the section related to 'consultation documents' is contradictory to the text underneath, and should be deleted. Consultation documents may be made available in both paper and electronic formats. |
| | Page 16 – The Littlehampton Gazette is listed as a media source - does this mean that the District Council intends to go back to advertising planning applications in the Littlehampton Gazette as well as the West Sussex Gazette? Littlehampton | The section of the SCI identified within the response identifies that planning policy consultations will be advertised using a number of potential media sources, |

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| | Town Council expressed concerns when the District Council ceased using the Littlehampton Gazette. | including The Littlehampton Gazette. The reference to the Littlehampton Gazette does not relate to planning application consultations. No amendment required. |
| | Page 20 & 24 - pre application consultation hardly ever happens and should be proactively encouraged. Suggest the wording is strengthened and consistent throughout the document. | Noted. However, the text on page 20 is an introduction to the pre-application service offered by the council. the text on page 24 identifies the consultation that the council suggest that a Developer/Agent/Promoter could undertake so that the local community are able to comment and inform proposals before they are submitted. No amendment required. |
| | Page 21 on pre-application advice 'officers opinion on the acceptability of the development proposal'. This should be heavily caveated so that is clear that this aspect of the advice does not constitute approval (a disclaimer in the same way that it is when such advice is formally given) especially where no pre-application consultation has taken place and is a major development. This advice should be given in general terms. | Agreed. Amend the 5 th bullet point on page 21 so that it reads: <ul style="list-style-type: none"> • Officer's opinion on the acceptability of the development proposal (such advice does not constitute approval) |
| | Page 22 - advertising planning applications. Include letters sent to a defined area surrounding the application. Often tenants will be the only ones to see proposals rather than property owners from signs on a lamppost and as we know these often go missing. Local Ward Members to be separately | Noted. However, the planning department consider that the current system of advertising in newspapers and through the use of a notice which is published on (or near) the site is the best approach for the resources available. The use of |

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| | advised of applications in their Ward. | neighbour notifications is not considered to be available within the resources available to the department. No amendment required. |
| | Page 26 - Planning Performance Agreements. It has to be ensured / introduce a caveat that makes it clear, that PPAs are not taken by the applicant, or others, as support for the application before a decision is made. In the Sir Richard Hotham application for Bognor much mention was made of this by the applicants and in the appeal decision letter even the Planning Inspector commented that one was in place. | Agreed. Amend the penultimate paragraph of page 26 to include such a caveat regarding PPAs. An additional sentence should be added which reads as follows: It should be noted that that PPAs are not taken by the applicant, or others, as support for the application before a decision is made. |
| | | |
| Lyminster & Crossbush Parish Council | I write on behalf of Lyminster & Crossbush Parish Council. We have no further comment on this document. | Noted. No amendment required |
| | | |
| Natural England | We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. We regret we are unable to comment, in detail, on individual Statements of Community Involvement but information on the planning service we offer, including advice on how to consult us, can be found at: https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals . | Noted. No amendment required |
| | | |

| | | |
|-----------------------------|--|--|
| <p>Chris Sprules</p> | <p>You have failed to listen to the community at any stage during the planning process.</p> <p>Neighbourhood Plans have been ignored and no attempt has been made to plan holistically as a result you are:</p> <ul style="list-style-type: none"> • Designing traffic congestion hot spots • Increasing air pollution levels • Allowing housing estates to be built where there is insufficient parking and residents have to park on street <ul style="list-style-type: none"> ○ Houses that are not required locally both in type and design ○ Houses that are considered to small compared to European standards ○ Houses where residents have insufficient ground to allow them to grow fruit and vegetables • giving insufficient thought to Sustainable transport options <p>HEELAS sites don't form part of the Community plans. They are forced on communities with no thought whatsoever for existing communities AND judging by the sites listed you intend to build over the whole of the fields to the West of the Arun</p> <p>Section 106 is not being used locally to lessen the impact of these estates and there is some doubt on how well the S106 process is being managed by ADC</p> <p>ADC does not appear to have the will to want to listen or discuss what they are doing with the communities: even the meetings with developers, Parish Councils are all held behind</p> | <p>Noted. However, these are not direct issues for the Statement of Community Involvement, and relate to the more detailed issues of Local Plan production, and planning application determination. No amendment required.</p> |
|-----------------------------|--|--|

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| | <p>closed doors</p> <p>SO my closing comment is you haven't involved the Community</p> | |
| Mr. H. Stamp | <p>Thank you for a good draft SCI.</p> <p>So good that there is little to comment upon, so only certain points.</p> | Noted. No amendment required |
| | 1) You could usefully explain details of the public sector equality duty (foot of page 10), e.g. does it relate to the Target Groups in the table on pages 38-39, or go further? | Noted. it is considered that the text explaining the public sector equality duty is suitable, and no change is required. |
| | 2) The box at the top of page 14 seems to contradict the text on page 15 regarding paper copies of consultation documents: page 15 is preferable as it includes more locations than just the Civic Centre, Littlehampton. | <p>Noted. amend the first sentence of the second column to read:</p> <p>The Council will produce consultation documents and make them available at various locations <u>(including the Arun Civic Centre, Bognor Regis Town Hall and libraries within the district)</u>.</p> |
| | 3) Page 16 mentions strict deadlines. It would be better that all consultations don't end at 5pm on a Friday. Most people will assume that any responses won't be looked at until the Monday morning. And for working people (including your 20-50 age target group) a weekend is useful: possibly the only time that busy people can find the time to respond. A closing time of 5pm on a Monday or Tuesday would be far better (Tuesday being better for postal comments). Its worked well elsewhere. (This could also be helpful for closing dates of job applications for vacant posts Planning Services | Strict deadlines are proposed so that there is a clear time with which to provide comments. There are no specific end days identified within the SCI. however, the suggestions made within the representation will be noted, and taken into consideration in the future. No amendment required. |

| | | |
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| | may have in future). | |
| | 4) There is a typo in the penultimate paragraph of page 11: I guess it should either be "Council's website", or "Council website" as you have used elsewhere in the SCI. | Noted. Amend the last sentence of the penultimate paragraph so that the word Council includes an apostrophe. The sentence will now read: The Local Development Scheme operates over a three year period and is available via the Council's website: www.arun.gov.uk . |
| | | |
| West Sussex Access Forum | Para 9 page 10 – Who will be consulted? We agree that a wide range of stakeholders and groups should be consulted. | Noted. No amendment required |
| | Para 9 page 11 – When we will undertake consultation We agree that a significant effort should be made to engage people at the earliest stages of preparing planning documents, in order to ensure that issues are highlighted at an early stage. | Noted. No amendment required |
| | Para11 page 12 – Consultation Methods All methods shown in the table are supported. WSLAF has found email alerts to be of particular value. | Noted. No amendment required |
| | Para12 page 13 – Stakeholder Engagement Meetings for local groups are especially important and useful in order to contact 'hard to reach' people. | Noted. No amendment required. |
| | Para 15 page 16 – Consultation Analysis WSLAF welcomes the intention to make the analysis available | Noted. No amendment required. |

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| | for inspection on the Council's website. It is important that all consultees feel that their representations have been considered, even though they may not agree with the Council's response. | |
| | <p>Para 23 page 24 – Developer/Agent Promoter Consultations</p> <p>It is vital the Council pro-actively encourages developers to engage with as many local groups as possible at the pre-application stage. This will assist in identifying issues which can then be addressed at an early stage.</p> | Noted. However, it should be noted that the Council can only request that applicants carry out pre-application consultation. The Council cannot refuse to accept planning applications because an applicant has not to undertaken pre-application consultations. |
| | <p>Appendix 1 page 33</p> <p>The Council needs to widely publish a list of organisations, both big and small, to whom they will routinely send notice of those involved in each Plan document. In this way each organisation will be aware that they are on the list of consultees.</p> | Noted. Such a list is maintained by the policy team, and kept up to date in order to ensure the relevant organisations are consulted. All relevant organisations will be consulted as a matter of course. It is not considered that this list should be published. No amendment required. |
| Factual Amendments | <p>Page 5 – Introduction</p> <p>Revise the reference to the NPPF as the text is no longer included within the revised version which was published in 2018.</p> | <p>Revise the second paragraph to read:</p> <p>The National Planning Policy Framework (NPPF) sets out the Government's planning policies and must be taken into account in the preparation of development plans and planning application decisions. The NPPF states that the planning system should be easier to understand, more accessible and include a commitment to involving all who are interested in planning. Paragraph 16 of the NPPF (2018) states "Plans should:..... be</p> |

| | | |
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| | | shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”. “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that local plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of an area, including those contained in any neighbourhood plans that may have been made.” NPPF (2012) paragraph 155. |
| | Page 7 – revise the text associated with the definition of major development so that it refers to the Development Management Procedure Order 2015 | Add a foot note to the second bullet point that includes a reference to the Development Management Procedure Order 2015 |
| | Page 8 – Table 1 refers to the Proposals Map, when this should be Policies Map | Revise the reference in the table as follows: - Proposals Policies Map |
| | Page 9 - amend references to statement of representations procedures. | Amend reference in rows 4 and 6 so that references are made to ‘statement of representations procedures’ |
| | Page 14 – Table 4. Replace reference to Local Plan Sub-committee with ‘Planning Policy Sub-Committee’ | Amend the third column of table four to make reference to the Planning Policy |

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| | | <p>Sub-Committee:</p> <p>Report to Local Plan Planning Policy Sub Committee</p> |
| | <p>Page 18 – include reference to the fact that once a NP has passed referendum it will come into effect as a statutory plan (as set out in the PPG) even though it remains to be made through a Council decision</p> | <p>Insert an additional paragraph of text under the bullet points to read:</p> <p>Once a NDP has successfully passed referendum it will come into effect as a statutory plan (as set out in the Planning Practice Guidance (PPG) even though it remains to be made through a Council decision.</p> |
| | <p>Pages 18/19 – Ensure that the word ‘order’ is added to all references to Community Right to build Order.</p> | <p>add the word ‘order’ to references to the Community Right to build Order</p> |
| | <p>Page 31 - delete reference to saved policies as these no longer exist with the adoption of the Arun Local Plan 2018</p> | <p>Amend the text related to ‘Policies Map’ to read</p> <p>Policies Map – The adopted Policies Map illustrates all of the policies and proposals in the Development Plan Documents and any saved policies that are included in the Local Plan.</p> |
| | <p>Page 31 – text missing related to the ‘Local plan’</p> | <p>Include text related to the Local Plan in the glossary</p> <p>Local Plan A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is</p> |

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| | | described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two. |
| | Page 33 - Specific consultation bodies Highways Agency should be Highways England and Heritage England should be Historic England | And the references as follows: The Highways Agency Highways England Heritage Historic England |
| | Page 34 - replace reference to Housing associations with Registered Providers? | Housing associations Registered Providers |

AGENDA ITEM NO. 7**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT**

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| SUBJECT: CIL EVIDENCE BASE AND PRELIMINARY DRAFT CHARGING SCHEDULE |
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| REPORT AUTHOR: Nicki Faulkner, Principal Planner DATE: 13 November 2018 EXTN: x 37645 PORTFOLIO AREA: Planning |
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EXECUTIVE SUMMARY:

On 27 September 2018, the then CIL Sub-Committee deferred the decision to note the CIL Viability evidence and to make a recommendation to Full Council that the Preliminary Draft Charging Schedule be published for consultation until all Members had received a CIL briefing.

This report will be presented to the Planning Policy Sub-Committee following the arranged CIL Briefing (to take place on 4 December 2018). It combines the CIL Viability Evidence and the proposed Preliminary Draft Charging Schedule reports that were taken to the former CIL Sub-Committee in September and asks the Planning Policy Sub-Committee to agree that the Preliminary Draft Charging Schedule is published for consultation.

RECOMMENDATIONS:

The Sub-Committee is requested to:

1. note the findings of the CIL Viability Update Report 2018; and
2. agree that the Preliminary Draft Charging Schedule is published for public consultation (under Reg. 15 of the CIL Regulations 2010) from 10 December 2018 until 5pm on 21 January 2019.

1. BACKGROUND:

- 1.1 On 27 September, the former CIL Sub-Committee deferred the decision to note the CIL Viability evidence and to make a recommendation to Full Council that the Preliminary Draft Charging Schedule be published for consultation until a CIL briefing was provided to all members. The reports are provided in **Appendix A and B**.

| | | |
|--|------------|-----------|
| <p>1.2 As requested, a CIL Briefing will have been held for all Members by the time this report is presented. The briefing will include a presentation and question and answer session given by the CIL viability consultant from HDH Planning and Development.</p> <p>1.3 This short report has been prepared because it refers Members of the Planning Policy Sub-Committee to the content of the reports in Appendix A and B. This report does not directly replicate the recommendations set out in the September reports but asks Members to consider the two recommendations set out above.</p> <p>1.4 If Members are minded to agree that the Preliminary Draft Charging Schedule (PDCS) is published for consultation, this will provide the first opportunity for stakeholders to engage in the preparation of the Council's CIL charging schedule. Representations received will be considered and any subsequent changes will be incorporated into a Draft Charging Schedule. Subject to agreement, a second round of consultation will take place on the Draft Charging Schedule.</p> | | |
| <p>2. PROPOSAL(S):</p> <p>That the CIL Viability Update Report, 2018 is noted and that a draft Preliminary Charging Schedule (PDCS) is consulted on.</p> | | |
| <p>3. OPTIONS:</p> <p>To note the CIL Viability Evidence Study and approve the proposed consultation of the PDCS or decline to note the CIL Viability evidence study and decline approval for a public consultation on the PDCS.</p> | | |
| <p>4. CONSULTATION:</p> <p>Members were provided with the opportunity to attend a CIL Briefing on 4 December 2018</p> | | |
| Has consultation been undertaken with: | YES | NO |
| Relevant Town/Parish Council | | |
| Relevant District Ward Councillors | x | |
| Other groups/persons (please specify) | | |
| 5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | YES | NO |
| Financial | x | |
| Legal | x | |
| Human Rights/Equality Impact Assessment | | x |
| Community Safety including Section 17 of Crime & Disorder Act | | x |
| Sustainability | x | |
| Asset Management/Property/Land | | x |
| Technology | | x |
| Other (please explain) | | |

6. IMPLICATIONS:

The adoption of a CIL Charging schedule following successful consultation and examination will ensure that financial contributions can be legally secured following planning approvals for qualifying types of development and landuses in order to address the off-site cumulative impacts of development across the District to ensure that development is delivered sustainably with necessary supporting infrastructure.

7. REASON FOR THE DECISION:

To ensure that development is delivered sustainably with necessary supporting infrastructure.

8. BACKGROUND PAPERS:

Remember to list background papers and insert required links

Appendix A: CIL Evidence Base Update Report (from 27th September 2018)

Appendix Ai: Chapter 7, CIL Viability Update Report (July, 2018)

Appendix Aii: CIL Zone Maps

Appendix B: Proposed Preliminary Draft Charging Schedule (from 27th September 2018)

Appendix Bi: Preliminary Draft Charging Schedule Consultation Document (September 2018).

Item 7 – Appendix A

ARUN DISTRICT COUNCILCIL SUB-COMMITTEE – 27th September 2018

Subject: CIL Evidence Base Update

Report by : Nicki Faulkner, Principal Planning Officer

Report date : August 2018

EXECUTIVE SUMMARY

The Council undertook a consultation on the Community Infrastructure Levy Preliminary Draft Charging Schedule (CIL PDCS) between March and April 2015. However, the preparation of the CIL charging schedule was put on hold following the suspension of the Arun Local Plan Examination in February 2016.

In order to recommence work on the preparation of the Arun CIL charging schedule, the Local Plan Viability Report (January 2017) has been revisited and updated and the latest infrastructure evidence reviewed. This report sets out the key findings from the evidence, including the identification of an infrastructure funding gap and that a CIL charge would remain viable on certain types of development within the district.

RECOMMENDATIONS

That the Community Infrastructure Levy Sub-Committee notes the findings of the CIL Viability Update Report 2018.

1.0 BACKGROUND

- 1.1 Arun District Council resolved that that the Council seeks to adopt a Community Infrastructure Levy on 24th March 2011. Viability and Infrastructure evidence was prepared in 2013 and a Preliminary Draft Charging Schedule (PDCS) was consulted on in 2015. However, progress on the preparation of the CIL charging schedule was put on hold following the suspension of the Arun Local Plan (ALP) Examination in February 2016 and the need to review the ALP housing targets and therefore strategic allocations (which had previously been zero rated in the PDCS 2015).
- 1.2 Since work on the preparation of the CIL charging schedule was put on hold, the CIL regime has been reviewed nationally by the CIL Review Team. The purpose of the review was to “assess the extent to which

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CIL does or can provide an effective mechanism for funding infrastructure, and to recommend changes that would improve its operation...”. The team published its report in October 2016 and recommended a change to the CIL approach which would result in a broad and low level Local Infrastructure Tariff (LIT) for all development and Section 106 for large developments.

- 1.3 The CIL Review Team’s report left the future of the CIL regime uncertain. However, in the Autumn Budget 2017, the government announced its commitment to review CIL and developer contributions rather than to take forward the CIL Review Team’s recommended LIT. Since the budget announcement, the government has consulted on “Supporting housing delivery through developer contributions” (the consultation ran from 5th March 2018 – 10th May 2018) which proposed key reforms to the CIL system.
- 1.4 The timeframe for publication of the outcomes of the consultation are currently unknown and any changes would require time for necessary amendments to the CIL regulations. However, Planning Practice Guidance (PPG) on Viability was published on 24th July 2018. Paragraphs 2.21 to 2.34 of the Arun CIL Viability Update Report 2018 (CILVU, 2018) sets out how the evidence prepared is compliant and consistent with the proposed changes to the Draft Planning Practice Guidance for Viability (MHCLG, March 2018). Therefore, any further implications from the outcomes of the published PPG July 2018, will need to be dealt with at the Draft Charging Schedule stage.

Local Plan Update

- 1.5 The Arun Local Plan was adopted on 18th July 2018 by Full Council. In his report, the Planning Inspector made a main modification (MM64) to the submission plan which added the following wording to paragraph 22.0.9: “To secure a mechanism for contributions towards infrastructure the Community Infrastructure Levy (assuming it is retained), will be introduced as soon as possible after the adoption of this Local Plan...”.
- 1.6 As a result of the above, work has been undertaken to update the Local Plan viability evidence and prepare a CIL Viability Update in order to identify whether CIL is still a viable option for the district. In terms of infrastructure evidence that underpins the Local Plan, the Infrastructure Capacity Study and Delivery Plan (February, 2017) (ICSDP, 2017)

<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n10203.pdf&ver=10124>)

has been used as the most up to date evidence available in terms on infrastructure costs although this is a living document which can be updated on a regular basis in future.

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2.0 INFRASTRUCTURE EVIDENCE

2.1 The ICSDP 2017 replaces the Infrastructure Delivery Plan January 2015 and updates the total cost of infrastructure that will be necessary to mitigate the impact of strategic site developments. The table provided in the report under paragraph 6.2 (page 18) shows that based on total estimated costs and existing funding secured, there is a total infrastructure funding gap of approximately £270 million. However, based on estimated S106 contributions from the strategic sites, this funding gap reduces to £49 million.

2.2 Concern exists that the amount that could be generated by the Community Infrastructure Levy would not completely fill this gap. However, it must be remembered that some of the items in the ICSDP, 2017 are aspirational, and some prioritisation will be necessary.

3.0 ECONOMIC VIABILITY EVIDENCE

3.1 The CILVU, 2018 has been prepared as an annex to the Local Plan Viability Assessment (February, 2017) (LPVA, 2017) (Chapter 7 of the report is a useful summary and has been provided as an appendix to this report. The full report can be found at www.arun.gov.uk/cil). The detailed methodology used to prepare the update remains consistent with the LPVU, 2017 Report. Although the report was only eighteen months old, it was important to update key data that are sensitive to change such as residential values, non-residential values, development land values and development costs and returns. Furthermore, the update specifically focused upon the viability of CIL upon different types of development in the district.

3.2 The CILVU 2018 provides evidence for the level of charge which could be afforded by different types of development in different locations across the district. This evidence is primarily based on land and sales / rent values, but also takes into account development costs which includes the Local Plan policy requirements e.g. for 30% affordable housing contributions on developments of 11 units or more and other s.106 site and access mitigation to ensure sustainable development.

3.3 The Study has considered those principal forms of new development which have the potential for imposing a positive rate of CIL, namely:

- Residential (Strategic Site Allocations; Older People's Housing; Student Housing);
- Non Residential (including office; Industrial; Hotel; Retail).

Viability of Residential Development

3.4 A Residual Land Value model was used for the LPVU, 2017 and this method follows through into the CILVU, 2018. Bespoke variables and

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assumptions were defined for the study including residential values from recent transactions; a broad range of site typologies, taken from the Housing and Economic Land Availability Assessment (HELAA) and base construction costs. Developer profit based on 20% of Gross Development Value, with a lower figure of 6% of GDV where affordable housing would apply, was factored in to take account of the Draft Planning Practice Guidance for Viability (MHCLG, March 2018). A series of scenarios were then modelled using combinations of the above variables.

- 3.5 The Regulations require that the council must strike an appropriate balance between the desirability of funding the total cost of infrastructure required to support development of its area and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development. In setting the Council's CIL rate it is important that the level is set at a level that will allow the majority of sites to come forward.
- 3.6 The CILVU, 2018 tested the residential scenarios against the variables listed above to identify viable CIL rates. The outcomes are summarised in paragraph 6.17 of the report. It should be noted that the final suggested rates are set within a level of viability which ensures that the level of CIL would be less than 5% of the Gross Development Value on all sites. The study states, "On this basis the Council can have further confidence that development would not be put at risk."
- 3.7 The CIL Regulations allow the Council to set different rates of levy which can be justified by reference to economic viability of development. The CIL Viability Update identifies that there is considerable variations in values across the district, particularly between the higher value northern area (north of the A259) and lower value coastal area (south of the A259). Variations were also found between sites within and outside of the urban boundaries and on sites above and below the affordable housing threshold. The study found that these variations also applied to housing in the Sheltered and Extracare sector (Older People's Housing) and flatted development. The study found no scope to seek CIL from student housing.
- 3.8 There are significant infrastructure costs associated with the strategic allocations; therefore, these sites are also given a different rate. Table 1 shows the 5 zones that the study uses to set differential rates (a map of the charging zones can be found attached to this report and is available at www.arun.gov.uk/cil) and Table 2 shows the CIL rates recommended by the evidence base for residential uses.

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| | |
|--------|---|
| Zone 1 | The strategic sites at Pagham South, Pagham North, West of Bersted, BEW, Fontwell, Yapton, Ford, Climping, LEGA and Angmering North |
| Zone 2 | Within the urban boundaries in the Northern Area – being <i>that area to the north of the A259, North Bersted Bypass</i> |
| Zone 3 | Not within the urban boundaries in the Northern Area – being <i>that area to the north of the A259, North Bersted Bypass</i> |
| Zone 4 | Within the urban boundaries in the Coastal Area – being <i>that area to the south of the A259, North Bersted Bypass</i> |
| Zone 5 | Not within the urban boundaries in the Coastal Area – being <i>that area to the south of the A259, North Bersted Bypass</i> |

| Residential Development Type and Location | Maximum Rate of CIL |
|--|----------------------------|
| Zone 1 | £0/m ² |
| Sites of 10 and fewer units | |
| Zone 2 Zone 3 | £150/m ² |
| Zone 4 Zone 5 | £100/m ² |
| Sites of 11 of more units | |
| Zone 2 | £70/m ² |
| Zone 3 and 5 | £100/m ² |
| Zone 4 | £0/m ² |
| Flats | |
| Zone 2 and 3 | £100/m ² |
| Zone 4 and 5 | £0/m ² |
| Older People's Housing¹ | |
| Zone 2 and 3 | £70/m ² |
| Zone 4 and 5 | £0/m ² |

- 3.9 The residential appraisals confirm that an affordable housing target of 30% on sites of 11 units or more can be set, and that this would still allow for reasonable levels of CIL across all parts of Arun District.

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Viability of Commercial Development

- 3.10 The commercial appraisals suggest that the following types of use would not be able to support a CIL charge at any level, therefore they would be zero rated:
- Town Centre Offices
 - Out of Centre Offices
 - Industrial
 - Hotels
- 3.11 It should be noted, however, that the uses listed above may still be liable under s106 contributions for on-site improvements or s278 contributions for off-site highway improvements.
- 3.12 Supermarket and retail warehouse uses were found to be able to support a rate of £110 per square metre. Taking account of the viability outputs and the likelihood of town centre shops coming forward, the consultants did not consider that it would be proportionate to include a rate of CIL for this use.

| Table 3 – Recommended Rates of CIL for Retail Development (CIL Viability Update, July 2018) | |
|--|----------------------------|
| Retail Development Type | Maximum Rate of CIL |
| Shops | £0/m ² |
| Supermarkets ⁱⁱ Retail warehouse ⁱⁱⁱ | £110/m ² |

- 3.13 The report also recommends that all other development be zero rated (£0/m²).

4.0 CONCLUSIONS

- 4.1 This report explains in detail the requirements of the CIL evidence base preparation, in particular the Viability Assessment and the potential to fund the gap between s.106 contributions and strategic off-site infrastructure identified in the ICSDP, 2017. It also explains that consultants have been commissioned to undertake a further viability update and summarises the outputs, conclusions and recommendations of this evidence.
- 4.2 In setting a CIL, legislation requires the Council to strike an **appropriate balance** between the desirability of funding infrastructure to support development and the potential effects of imposing a charge on the economic viability of development as a whole.
- 4.3 It is clear from the ICSDP, 2017 prepared that the District Council has a sufficient infrastructure funding “gap” to justify setting a CIL charge. The CILVU, 2018 has assessed a wide range of development types

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that can be reasonably expected to afford CIL. It has identified that a number of commercial and retail uses are not economically viable, but that residential development and supermarkets and retail warehouses could be levied at differential rates based on location and type of development without putting the viability of development at risk. These rates do not result in more than a 25% reduction in land values and CIL would be less than 5% of the Gross Development Value on all sites.

- 4.4 The Conclusions and recommendations from these reports will inform the preparation of the Council's Preliminary Draft Charging Schedule which is set out in the subsequent report.

Contact: Nicki Faulkner ext: 37645 nicki.faulkner@arun.gov.uk

Appendices:

Appendix 1: Chapter 7, CIL Viability Update Report (July, 2018)

Appendix 2: CIL Zone Maps

ⁱ This includes sheltered or retirement housing which provide warden services and occasionally non-care support services. Also, extra-care housing can also be referred to as sheltered housing or housing with care.

ⁱⁱ Shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix. The majority of custom at supermarkets arrives by car, using the large adjacent car parks provided.

ⁱⁱⁱ Large stores specialising in the sale of comparison goods, DIY items and other ranges of goods catering mainly for car borne customers.



CIL VIABILITY UPDATE

(HDH Planning and Development JULY 2018)

REPORT EXTRACT

CHAPTER 7 Recommended Rates of CIL



CIL VIABILITY UPDATE, JULY 2018

ADDENDUM

This report (and the Local Plan Viability Assessment Update (January, 2017)) assesses "Littlehampton Economic Growth Area (LEGA)" as a Strategic Site. However, it should be noted that where the reports refer to LEGA as a strategic site, it should be taken to mean the housing allocation site within the LEGA area, entitled "Littlehampton-West Bank" (SD4) (see Arun Local Plan (2011-2031) - Policy H SP2b).

Therefore, upon reviewing the reports, please note that any reference to LEGA should be taken to mean "Littlehampton- Westbank" as allocated in the Arun Local Plan (2011-2031) and shown as SD4 on the Policies Maps.

PLANNING POLICY
August 2018

7. Recommended Rates of CIL

- 7.1 This document carries forward the analysis from the 2017 Viability Assessment to inform the setting of CIL. The 2017 Viability Assessment sets out the methodology used⁹, and the key assumptions adopted¹⁰. This report develops that evidence as a first step towards assisting the Council with the development of CIL.
- 7.2 If, following the consideration of this report, the Council decides to pursue CIL, it will be necessary to prepare a Preliminary Draft Charging Schedule (PDCS) and consult on this with the development industry and other interested parties. This process will include publishing the proposed rates, as well as the supporting evidence and rationale for the charges. Following the consultation on the PDCS, the evidence will be updated as required, and Council will prepare a Draft Charging Schedule (DCS) for a further round of consultation with the development industry and other interested parties¹¹. Finally, the Council will consider the consultation responses and then submit a DCS for independent examination by the Planning Inspectorate (or other appropriate examiner).
- 7.3 The findings of this report do not determine the rates of CIL, but are one of a number of factors that the Council may consider when setting CIL. In setting CIL there are three main elements that need to be brought together:
- a. Evidence of the Infrastructure Requirements
 - b. Viability Evidence
 - c. Input of Stakeholders.
- 7.4 The recommendations made in this chapter are based on the policies set out in the *Modified - Arun Local Plan - January 2018 Consultation*. If these were to change as a result of the examination of the Local Plan, it may be necessary to revisit the recommendations.
- 7.5 Outside this report, the Council has carried out a substantial amount of work looking at the infrastructure requirements of the area. The latest updated IDP information indicates the total costs of providing the infrastructure to support the future residential development. The Council has drawn on three principle sources of information to inform the decision making process:
- a. The viability evidence set out in this report (and the earlier viability studies).

⁹ Chapter 2 and Chapter 3 ADC Local Plan Viability Assessment (HDH February 2017)

¹⁰ Residential values – Chapter 4, Non-residential values – Chapter 5, Land values – Chapter 6, ADC Local Plan Viability Assessment (HDH February 2017)

¹¹ As set out in Chapter 2 above, the Government has recently consulted on streamlining the CIL setting process to require only one round of consultation rather than the current two rounds.

- b. Information about the requirements for infrastructure and, in relation to the larger sites, what of that infrastructure can be funded under s106 bearing, in mind CIL Regulations 122 and 123.
- c. Projections of expected CIL receipts through consideration of the amount and types of development planned for and anticipated in different parts of the District.

7.6 In striking a balance between the different rates of CIL, the Council needs to consider a range of factors including those set out below.

Regulations and Guidance

7.7 CIL Regulation 14 (as amended) sets out the core principle for setting CIL:

In setting rates (including differential rates) in a charging schedule, a charging authority must strike an appropriate balance between— (a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and (b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area....

7.8 Viability testing in the context of CIL concerns the ‘effects’ on development viability of the imposition of CIL. The Council has taken into account the importance of the provision of infrastructure on the ability of the Council to meet its objectives through development and deliver its Development Plan.

7.9 The test that will be applied to the proposed rates of CIL is set out in the updated CIL Guidance, putting greater emphasis on demonstrating how CIL will be used to deliver the infrastructure required to support the Plan.

As set out in the National Planning Policy Framework in England (paragraphs 173 – 177), the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. The same principle applies in Wales.

PPG ID: 25-009-20140612

7.10 The test is whether the sites and the scale of development identified in the Plan are subject to such a scale of obligations and policy burdens (when considered together) that their ability to be developed viably is threatened by CIL. The viability evidence has considered the full range of the Council’s policy requirements, including the need for infrastructure funding. The test is whether CIL threatens the Development Plan as a whole – it is important to note that the CIL Regulation 14 is clear that the purpose of the viability testing is to establish ‘*the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area*’ rather than on specific sites.

Differential Rates

- 7.11 CIL Regulation 13 gives the flexibility to charge variable rates by zone and development type, however there has been some uncertainty around the charging of differential rates. We recommend that the Council adopts the following definitions¹²:

Supermarkets are shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix. The majority of custom at supermarkets arrives by car, using the large adjacent car parks provided.

Retail warehouses – are large stores specialising in the sale of comparison goods (such as carpets, furniture, and electrical goods) DIY items and other ranges of goods catering mainly for car borne customers.

New Regulations and Guidance

- 7.12 This Viability Assessment has been prepared in line with the current (June 2018) CIL Guidance and the CIL Regulations, best practice, and the various other sources of relevant Guidance. At the time of this report the Government is undertaking various consultations on changes to the NPPF, PPG and to CIL. It will be necessary for the Council to keep these under review.

CIL v s106

- 7.13 In order to reflect that the Council is likely to continue to seek some s106 contributions from development (subject to CIL Regulations 122 and 123) after the adoption of CIL, we have assumed a s106 payment of £2,000 /unit across all sites other than the large strategic sites. On the large strategic sites, the following assumptions are used:

¹² As approved by Sarah Housden sitting as an Independent CIL Examiner, in her report following her examination of the South Lakeland District Council CIL Charging Schedule (20th March 2015).

| Site | Locality (Parish) | Units | Gross Area (Ha) | S106 Costs | £/dwelling |
|-----------------|-----------------------------------|-------|-----------------|-------------|------------|
| Pagham South | Pagham | 400 | 24.52 | £4,952,893 | £12,382 |
| Pagham North | Pagham | 800 | 32.31 | £9,866,706 | £12,333 |
| West of Bersted | Pagham, Bersted | 2,500 | 163.03 | £36,033,152 | £14,413 |
| BEW | Eastergate, Aldingbourne, Barnham | 3,000 | 278.59 | £40,874,060 | £17,771 |
| Fontwell | Walberton, Eastergate | 400 | 18.10 | £6,049,130 | £15,122 |
| Yapton | Yapton | 500 | 24.21 | £9,361,040 | £18,722 |
| Ford | Ford/Climping | 1,500 | 115.10 | £23,082,750 | £15,388 |
| Climping | Climping | 500 | 26.42 | £10,206,810 | £20,413 |
| LEGA | Littlehampton, Climping | 1,000 | 162.45 | £45,135,060 | £45,135 |
| Angmering North | Angmering | 800 | 45.36 | £8,893,610 | £11,117 |

Source: Table 7.1 ADC Local Plan Viability Assessment (HDH February 2017) – as updated July 2018

- 7.14 Under the pre-CIL s106 regime, the delivery of site specific infrastructure largely fell to the developer of a site. If improvements to the infrastructure were required, then normally it was for the developer to procure and construct those items – albeit under the supervision of the relevant authority. The exception to this was in relation to education and public open space, where some councils had developed tariff systems for contributions to be made into a central ‘pot’ which was then spent across a general area. The use of s106 agreements to deliver infrastructure and mitigation measures is now limited through CIL Regulations 122 and 123.
- 7.15 The advantage of the earlier system was that, to a large extent, the developer had control of the process and could carry out (directly or indirectly) the works required to enable a scheme to come forward. By way of an example, these may be to provide a new roundabout and upgrade a stretch of road, or, on a very big scheme, provide community buildings such as a school. Under s106, the developer carries much of the financial and development risk associated with the process¹³.
- 7.16 If the Council moves to a system whereby CIL is set at the upper limit of viability, it is likely that the delivery of these infrastructure items will fall to the Council. The Council will need to consider the practicalities of this. Does it want to take responsibility for delivering infrastructure that is currently delivered by developers under the s106 regime, and if so, how it will manage and fund it? If the Council does not have a mechanism in place (that may involve borrowing monies), the Development Plan could be put at risk as consented schemes may not be able to proceed.

¹³ It should be noted that there is some uncertainty around how the provision of infrastructure sits within the EU Procurement Rules and whether the provision of such items should be subject to competitive tendering. We recommend that the Council takes independent legal advice in this regard.

- 7.17 As part of the process of working towards getting CIL in place, ADC has made an assessment of the infrastructure required to support new development and made a decision that the delivery of infrastructure required in connection with the strategic sites, where possible (bearing in mind the restrictions set out in CIL Regulation 122 and CIL Regulation 123) will deliver their own infrastructure under the s106 arrangements. An important part of striking the balance as to what level of CIL to charge, may be around the nature of infrastructure and how it is to be delivered.

Developers' Comments

- 7.18 An important part of the process of preparing the viability evidence set out in the 2017 Viability Assessment, and carried forward into this report, has been engagement with the development industry. In due course the Council will consult further at both the PDCS and DCS stages. It will be necessary to take the views of the industry into account.

Uncertain Market

- 7.19 Chapter 4 of the 2017 Viability Assessment includes a commentary on the property markets.
- 7.20 The current direction and state of the housing market has improved markedly over the last few years. There is however a degree of uncertainty in the housing market. This is, at least in part, due to the uncertainties following the referendum to leave the European Union.
- 7.21 Whilst the housing market has seen a recovery and there is considerable optimism in the non-residential sectors, there remain a number of uncertainties around the UK's relationship with Europe and the wider world economies. It is therefore appropriate to take a cautious approach when setting CIL and ensure that the cumulative impact of policies does not result in a total policy burden that is close to the limits of viability.

Neighbouring Authorities

- 7.22 The rates of CIL introduced by neighbouring local authorities are a useful context when it comes to considering rates of CIL.

*Chichester*7.23 Adopted from 1st February 2016¹⁴:

| Use of Development | Levy (£per square metre) |
|---|--------------------------|
| *Residential - South of the National Park | £120 |
| *Residential - North of the National Park | £200 |
| Retail (wholly or mainly convenience) | £125 |
| Retail (wholly or mainly comparison) | £20 |
| Purpose Built Student Housing | £30 |
| Standard Charge (applies to all development not separately defined) | £0 |

*Horsham*7.24 Adopted from 1st October 2017¹⁵.

| Residential Development (1) | CIL charge per m ² |
|--|-------------------------------|
| District-wide (Zone 1 – See Map 1) | £135 |
| Strategic Sites (Zone 2 – See Map 1) | £0 |
| Other Development (Across the Charging Area) | CIL charge per m ² |
| 'Large format' Retail Development (A1 to A5) including supermarkets (2) and retail warehousing (3) | £100 |
| 'Standard Charge' applies to all development not separately defined above, including, smaller retail development (A1 to A5) (4), offices, warehouses, leisure, education and health facilities (including B, C1, C2 excluding purpose built student accommodation, & D) | £0 |

*Adur*7.25 Work is underway however no rates have been published¹⁶.¹⁴ <http://www.chichester.gov.uk/cil>¹⁵ <https://www.horsham.gov.uk/planningpolicy/planning-policy/community-infrastructure-levy>¹⁶ <https://www.adur-worthing.gov.uk/planning-policy/infrastructure/#adur-cil>

Worthing

7.26 Adopted from 1st October 2017¹⁷.

| Use | Levy (£/m ²) | |
|---|--------------------------|--------|
| | Zone 1 | Zone 2 |
| Residential (C3) | £100 | Nil |
| Retail (A1-A5), excluding ancillary car parking | £150 | £150 |

South Downs National Park Authority

Adopted from 1st April 2017¹⁸

| Use of Development | Proposed Levy (£/m ²) |
|-----------------------|-----------------------------------|
| Residential – Zone 1 | 150 |
| Residential – Zone 2 | 200 |
| Large format retail | 120 |
| All other development | 0 |

Costs of Infrastructure and Sources of Funding

- 7.27 The Council has established the requirement for infrastructure to support new development and the costs of providing this. The Council will consider the amounts of funding that may or may not be available from other sources. The Council has a funding gap, that is to say the cost of providing the infrastructure is more than the identified funding.
- 7.28 When the Council strikes the balance and sets the levels of CIL, the amount of funding required will be a material consideration. It may be that the delivery of the Plan is threatened in the absence of CIL to pay for infrastructure. However, it should be stressed that CIL should be set with regard to the effect of CIL on development viability. There is no expectation that CIL should pay for all of the infrastructure requirements in an area. There are a range of other funding sources that are taken into account. The Council will need to consider the total amount of money that may be received through the consequence of development: from CIL, from s106 payments, and from the New Homes Bonus, when striking the balance as to its level of CIL.

¹⁷ <https://www.adur-worthing.gov.uk/planning-policy/infrastructure/#adur-cil>

¹⁸ <https://www.southdowns.gov.uk/planning/community-infrastructure-levy/about-cil/>

- 7.29 Bearing in mind the requirements of the CIL Guidance, it is best practice that the 123 List is prepared and set out at the time of the Consultation on the PDCS. We recommend that the Council publishes a draft 123 List, and consults stakeholders on its content.
- 7.30 When setting out the costs and other sources of funding, the Council will need to consider the amount that can be retained to cover the cost of administering CIL (5%) and the amount to be passed to the local neighbourhood (see below) under the localism provisions as these will substantially reduce the monies available.

| | |
|---|---|
| Parish Council and a Neighbourhood Plan = 25% uncapped paid to Parish | Parish Council but no Neighbourhood Plan = 15% capped at £100/dwelling paid to Parish |
| No Parish Council but a Neighbourhood Plan = 25% uncapped - Local Authority consults with community | No Parish Council and no Neighbourhood Plan = 15% capped at £100/dwelling - Local Authority consults with community |

Instalment Policy

- 7.31 During the preparation of the 2017 Viability Assessment a consultation event was held with members of the development industry. The importance of allowing CIL to be paid through the life of a project was raised. With this in mind, the analysis in this report is based on the assumption that CIL is paid through the life of the schemes. The following Instalment Policy is suggested:

| Amount of CIL | No of Instalments | Payment periods and amount |
|--|--------------------------|--|
| Any amount less than £10,000 | One payment | Total amount payable within 60 days of commencement of development |
| Amount equal to £10,000 or less than £50,000 | Three instalments | 60 days, 120 days and 180 days |
| Amount equal to £50,000 or less than £100,000 | Four instalments | 60 days, 180 days, 360 days and 540 days |
| Amount higher than £100,000 | Five instalments | 60 days, 120 days, 360 days, 540 days and 720 days |
| In any event CIL will be paid before a unit is occupied. | | |

Source: HDH (June 2018)

- 7.32 The CIL Guidance sets out:

Regulation 70 (as amended by the 2012 and 2013 Regulations) provides for payment by instalment where an instalment policy is in place. Where no instalment policy is in place, payment is due in full at the end of 60 days after development commenced (see Regulation 7, and section 56(4) of the Town and Country Planning Act 1990, for the definition of 'commencement of development').

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- 7.33 If an Instalment Policy is not adopted, then payment is due in full at the end of 60 days after commencement. To require payment, particularly on large schemes in line with the above, could have a dramatic and serious impact on the delivery of projects. It is our firm recommendation that the Council introduces an Instalment Policy. Not to do so could put the Development Plan at serious risk.

Viability Evidence – Rates and Zones

- 7.34 In considering CIL in this report we have based the assessment on the *Modified - Arun Local Plan - January 2018 Consultation*. This may change as a result of the Local Plan examination, so it will be necessary to ensure that the advice in relation to CIL remains appropriate, relative to the Council's wider policy requirements.
- 7.35 The viability analysis has been carried out in line with the requirements of the NPPF, CIL Regulations and PPG (which includes the CIL Guidance) as at June 2018¹⁹. This is a prescriptive process that is aiming to understand development viability in the plan-making / CIL-setting context in a high-level way. It is a process that generally does not look at the deliverability of individual sites or any particular developers' business model or methodology – although in this case the Council has considered the Strategic Sites separately as they are key to the deliverability of the Plan as a whole.
- 7.36 A number of development sites (residential and non-residential) have been modelled, and from this, the impact of CIL is inferred. These modelled sites are based on the sites that are anticipated to come forward under the new Local Plan²⁰.
- 7.37 This study uses the Residual Value methodology as set out in the Harman Guidance. This assesses the impact of introducing CIL in the context of meeting all the Council's other policy requirements. Using evidence of local house prices and non-residential values, local development costs and assumptions about the availability of development finance, developer's profits and the general characteristics of development in Arun District area, an assessment is made of the amount by which land values may be depressed by the Levy and whether that is sufficient to deter landowners from making their land available for development.
- 7.38 CIL may be set for different development types and by different areas – although it is necessary to keep any charging schedule simple.

Residential Development

- 7.39 We have drawn on the viability evidence set out in the 2017 Viability Assessment and in Chapter 6 of this report. The CIL Guidance is clear that CIL should not be set at the limits of

¹⁹ As set out in Chapter 2 above, at the time of this report the Government is undertaking various consultations on changes to the NPPF, PPG and to CIL. It will be necessary for the Council to keep these under review.

²⁰ As per the distribution set out towards the beginning of Chapter 6 above.

viability. In considering the rates of CIL, it has been assumed that the Residual Value should generally be 50% above the Viability Threshold.

- a. Whilst the strategic sites at Pagham North, Pagham South, Fontwell and Angmering North are shown as viable, this is only by a small margin. These sites are recommended for a zero rate of CIL to ensure that their delivery is not prejudiced.
- b. In the lower value Coastal Area, all the flatted schemes (represented by typologies 18, 19 and 20) are shown as unviable. It is therefore recommended that a zero rate of CIL is applied. This is a cautious approach as this type of development makes up a very small (less than 0.8%) of the units identified through the HELAA.
- c. In the lower value Coastal Area, the larger brownfield sites that are subject to the affordable housing policy (represented by typologies 10, 11, 12 and 13) are either not viable or only viable by a small margin. It is therefore recommended that a zero rate of CIL is applied as this type of development. This is a cautious approach as this type of development makes up a very small (less than 0.8%) of the units identified through the HELAA.
- d. In the lower value Coastal Area, the larger greenfield sites that are subject to the affordable housing policy (represented by typologies 1, 2, 3, 4 and 5) are all shown as viable and all have the capacity to bear at least £200/m² in CIL. These typologies represent just under 20% of the capacity identified through the HELAA.
- e. In the lower value Coastal Area, the smaller sites that are below the affordable housing threshold (represented by typologies 6 to 9 and typologies 14 to 17) are all shown as viable and all have the capacity to bear CIL up to the maximum level tested of £300/m². These types of site are generally below the size included within the HELAA, but are an important source of windfall development.
- f. In the higher value Northern Area, the flatted schemes (represented by typologies 18, 19 and 20) are shown as viable. When a 'cushion' or buffer is considered, a rate of CIL of up to £120/m² would be appropriate. Having said this, these typologies represent just 17 of the units identified through the HELAA, which is less than 0.1% of the units identified through the HELAA so it may not be proportionate to add the complications of setting a separate rate for flatted development in this area.
- g. In the higher value Northern Area, the larger brownfield sites that are subject to the affordable housing policy (represented by typologies 10, 11, 12 and 13) are either not viable or only viable by a relatively small margin when compared to the greenfield sites. There is one site in the Northern Area that are similar to the typologies 10 and 11, being the larger sites with a capacity of 114 units (being less than 0,6% of the overall HELAA capacity). When a 'cushion' or buffer is considered, a rate of CIL of up to £70/m² would be appropriate.
- h. In the higher value Northern Area, the larger greenfield sites that are subject to the affordable housing policy (represented by typologies 1, 2, 3, 4 and 5) are all shown as viable and all have the capacity to bear at least £200/m² in CIL. These typologies represent just over 21% of the capacity identified through the HELAA.

- i. In the higher value Northern Area the smaller sites that are below the affordable housing threshold (represented by typologies 6 to 9 and typologies 14 to 17) are all shown as viable and all have the capacity to bear CIL up to the maximum level tested of £300/m². These types of site are generally below the size included within the HELAA, but are an important source of windfall development.

7.40 To further inform the CIL rate setting process, we have calculated CIL as a proportion of the Residual Value and the Gross Development Value. CIL as the proportion of the Residual Value, in approximate terms, represents the percentage fall in land value that a landowner may receive. As set out in the 2017 Viability Assessment, it is inevitable that CIL will depress land prices. This is recognised in the RICS Guidance and was considered at the Greater Norwich CIL examination. In Greater Norwich it was suggested that landowners may accept a 25% fall in land prices following the introduction of CIL.

7.41 This analysis does suggest that some of the rates suggested above may be rather too high:

- a. In the lower value Coastal Area, on the larger greenfield sites (represented by typologies 1, 2, 3, 4 and 5), a rate of £200/m² may represent nearly 50% of the Residual Value. This is likely to alter the behaviour of landowners. Under this test a maximum rate of £110/m² is suggested.
- b. In the lower value Coastal Area, the smaller sites that are below the affordable housing threshold (represented by typologies 6 to 9 and typologies 14 to 17), a rate of £300/m² may represent over 50% of the Residual Value. This is likely to alter the behaviour of landowners. Under this test a maximum rate of £170/m² is suggested for the greenfield sites and £100/m² for the brownfield sites.
- c. In the higher value Northern Area, the flatted schemes (represented by typologies 18, 19 and 20) are shown as viable. Under this test a maximum rate of £90/m² is suggested.
- d. In the higher value Northern Area, the larger brownfield sites that are subject to the affordable housing policy (represented by typologies 10, 11, 12 and 13) a rate of £70/m² may represent less than 10% of the Residual Value so would be appropriate under this test.
- e. In the higher value Northern Area, the larger greenfield sites that are subject to the affordable housing policy (represented by typologies 1, 2, 3, 4 and 5), a rate of £200/m² may represent about 50% of the Residual Value. Under this test a maximum rate of £120/m² is suggested.
- f. In the higher value Northern Area, the smaller sites that are below the affordable housing threshold (represented by typologies 6 to 9 and typologies 14 to 17), a rate of £300/m² may represent about 60% of the Residual Value. Under this test a maximum rate of £180/m² is suggested for the greenfield sites and £160/m² for the brownfield sites.

7.42 Plan-wide viability testing is not an exact science. The process is based on high-level modelling and assumptions. The process adopted by many developers is similar, hence the

use of contingency sums, the competitive return assumptions and the generally cautious approach. CIL is considered as a proportion of the Gross Development Value.

- 7.43 This analysis shows that CIL, at the rates mentioned above, would be less than 5% of the Gross Development Value on all sites. On this basis the Council can have further confidence that development would not be put at risk.

Older People's Housing

- 7.44 As well as mainstream housing, we have considered the Sheltered and Extracare sectors separately. This builds on the analysis towards the end of Chapter 10 of the 2017 Viability Assessment.
- 7.45 This analysis indicates that there is not scope for CIL in the Sheltered sector, nor the Extracare sector in the Coastal Areas (being the areas represented by the Bognor Regis and Littlehampton appraisals).
- 7.46 In the higher value Northern Area (being the area represented by the Arundel appraisal) there is scope for CIL. In considering the rates it has been assumed that most specialist older peoples housing will be in the more sustainable locations closer to the town centres – that is to say on brownfield sites. In the analysis set out earlier in this chapter a maximum rate of £70/m² was recommended for residential development that is subject to affordable housing on the larger brownfield sites. A slightly higher rate of £90/m² could be charged on specialist older people's housing in the Northern Area.

Student Housing

- 7.47 In the 2017 Viability Assessment Student Housing was assessed not to be viable. Since then there has been little change in the 'rents' and therefore values, however construction costs have risen. Viability has therefore deteriorated and there is not scope to seek CIL from this type of development.

Non-residential Development

- 7.48 The viability of non-residential development was considered in Chapter 11 of the 2017 Viability Assessment. In this update the construction costs have been updated, but all other inputs held unchanged.
- 7.49 The employment uses of office and industrial, and hotel uses are not considered further as they are not shown as viable (which is consistent with the 2017 Viability Assessment). Retail is shown as viable. As for residential development above, we have assumed a cushion/buffer of 50% over and above the viability threshold. We have also calculated CIL as a proportion of land value (less than 25%) and as a proportion of GDV (less than 5%).
- 7.50 A range of retail development types was considered.

Shops – Central The Council does not anticipate this type of development coming forward. It will only come forward on brownfield land and be the redevelopment of existing sites. As CIL is only payable on net new development it will be necessary to consider whether a levy on this development type is actually going to raise money.

On balance it is not considered proportionate to include a rate of CIL.

Shops – Other These are shops outside central high streets and little such development is anticipated in District, however the notable exception will be the new strategic sites which will incorporate various neighbourhood centres that will include retail development.

There is not scope for CIL on this type of development.

Supermarket Development The District is well served by larger format retail development, and little is now anticipated. That that may come forward is only likely to be on greenfield sites (due to the scale of land required for such development).

At £130/m² such development remains viable and CIL would be less than 25% of the Residual Value and 4% of GDV. On this basis this rate would be appropriate.

For smaller supermarkets the analysis indicates a broadly similar rate.

Retail Warehouse At £110/m² such development remains viable and CIL would be less than 20% of the Residual Value and 5% of GDV. On this basis this rate would be appropriate.

Recommended Rates of CIL

7.51 In this chapter we have set out the range of factors to be considered when setting CIL. Through the process of engagement with the Council and taking into account all the matters set out above, it was decided that:

- a. CIL is required to fund infrastructure. Having taken into account the other sources of finance, there is a ‘funding gap’ and CIL could make a useful contribution to fund the infrastructure required to support the development most likely to come forward under the Plan.
- b. Affordable housing remains a Council priority, but the Council also puts weight on the delivery of infrastructure.
- c. The Council and its partners have been successful in securing capital funding for infrastructure but there remains a significant ‘funding gap’.
- d. It would be preferable, if supported by evidence, to ‘keep things simple’ and not have multiple rates of CIL – although it was recognised that it was appropriate to have differential rates. It was agreed that a fine-grained approach was not desirable.

- e. CIL setting is a qualitative and a quantitative process. CIL is not calculated through a predetermined formula. The Council is required to ‘*strike the balance between (a) the desirability of funding from CIL ... the ... cost of infrastructure required to support the development of its area, ... and (b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.*

7.52 Based on the above, the following rates of CIL are recommended. These are based on the following zones. These need to be shown on an Ordnance Survey map in line with the CIL Regulations:

- Zone 1 The strategic sites at Pagham South, Pagham North, West of Bersted, BEW, Fontwell, Yapton, Ford, Climping, LEGA and Angmering North
- Zone 2 Within the urban boundaries in the Northern Area – being *that area to the north of the A259, North Bersted Bypass*
- Zone 3 Not within the urban boundaries in the Northern Area – being *that area to the north of the A259, North Bersted Bypass*
- Zone 4 Within the urban boundaries in the Coastal Area – being *that area to the south of the A259, North Bersted Bypass*
- Zone 5 Not within the urban boundaries in the Coastal Area – being *that area to the south of the A259, North Bersted Bypass*

| Table 7.3 Recommended Rates of CIL | |
|------------------------------------|---------------------|
| Development Type | Maximum Rate of CIL |
| Residential | |
| Zone 1 (Strategic Sites) | £0/m ² |
| Sites of 10 and fewer units | |
| Zone 2 and 3 | £150/m ² |
| Zone 4 and 5 | £100/m ² |
| Sites of 11 and more units | |
| Zone 2 | £70/m ² |
| Zone 3 and 5 | £100/m ² |
| Zone 4 | £0/m ² |
| Flats | |
| Zone 2 and 3 | £100/m ² |
| Zone 4 and 5 | £0/m ² |
| Older People's Housing | |
| Zone 2 and 3 | £70/m ² |
| Zone 4 and 5 | £0/m ² |
| Retail Development | |
| Shops | £0/m ² |
| Supermarkets, Retail Warehouse | £110/m ² |
| All Other Development | £0/m ² |

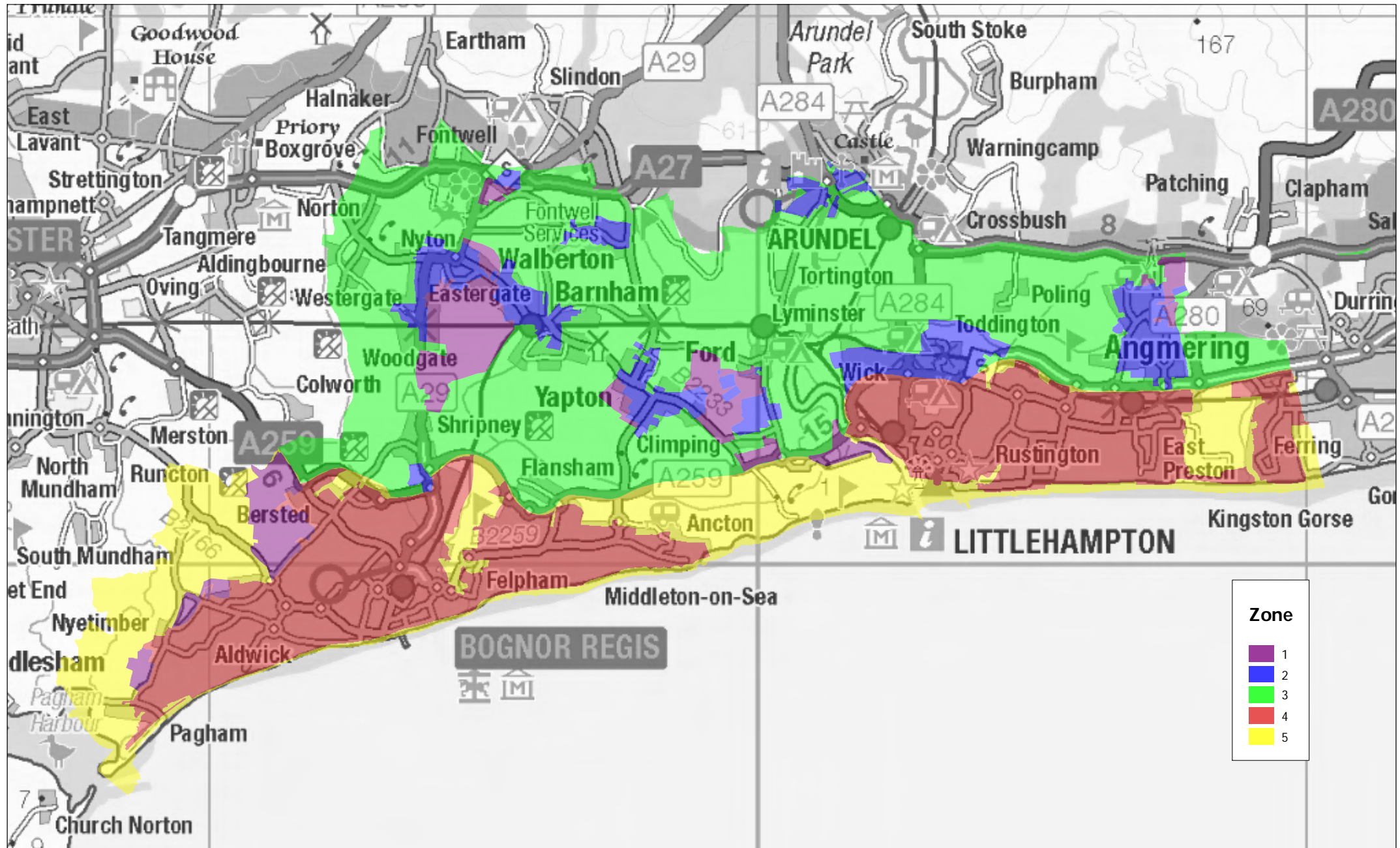
Source: HDH (July 2018)

Next Steps

- 7.53 The recommendations in this study are ‘a consultant’s view’ and do not reflect the particular priorities and emphasis that ADC may put on different parts of its Development Plan.
- 7.54 The above suggested rates are supported by the evidence – however there is considerable scope for the Council to strike a different balance.
- 7.55 We stress that the information in this report is an important element of the evidence for setting CIL, but is only one part of the evidence; the wider context needs to be considered.



CIL CHARGING ZONES



SCALE 1:90000 @ A4 LANDSCAPE

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ARUN DISTRICT COUNCILCIL SUB-COMMITTEE – 27th September 2018

Subject: Proposed Preliminary Draft Charging Schedule

Report by : Nicki Faulkner, Principal Planning Officer

Report date : August 2018

EXECUTIVE SUMMARY

This report sets out the work undertaken in preparing the Preliminary Draft Charging Schedule (provided in Appendix 1), it explains the main features of the document and refers to the key evidence base documents that inform it, namely the Arun Local Plan 2011-2031 (July, 2018) (the ALP) (<https://www.arun.gov.uk/adopted-local-plan>); the Infrastructure Capacity Study and Delivery Plan (February, 2017) (ICSDP, 2017) (<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n10184.pdf&ver=10105>) and the CIL Viability Update (July, 2018) (CILVU, 2018) (www.arun.gov.uk/cil).

RECOMMENDATIONS

- 1) That the Community Infrastructure Levy Sub-Committee recommends to Full Council to publish the Preliminary Draft Charging Schedule for public consultation between the 12th November 2018 and 7th January 2019.
- 2) That Full Council gives delegated authority to officers to prepare to submit the charging schedule for Examination subject to the following:
 - i. That amended CIL regulations (replacing the current statutory requirements for two rounds of CIL consultation with a requirement to publish a 'Statement of Engagement') are made within a timeframe which allows the council to accelerate the CIL preparation process, and;
 - ii. That the responses received as part of the Preliminary Draft Charging Schedule Consultation do not raise significant issues that would justify a second round of consultation.

1.0 BACKGROUND

- 1.1 Preparation of the Arun CIL Charging Schedule was put on hold in February 2016 following the suspension of the Arun Local Plan examination. This allowed work to be undertaken to address the

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housing delivery shortfall and main modifications to the submission Local Plan. Following examination in July 2018 the Inspector, found the plan ‘sound’ subject to main modifications. The Arun Local Plan 2011-2031 (the ALP) was adopted by Arun District Council on 18th July 2018. The Inspector’s report refers to a Main Modification which states that “To secure a mechanism for contributions towards infrastructure the Community Infrastructure Levy (assuming it is retained) will be introduced as soon as possible after the adoption of this Local Plan...”.

- 1.2 The previous report item “CIL- Evidence Base Update” outlines the progress made on preparing a Community Infrastructure Levy for Arun District to date and asks members to note the most recent viability report prepared to inform the proposed CIL rate.
- 1.3 Guidance on the preparation of a Community Infrastructure Levy is set out in the statutory Regulations and through Guidance Notes. These require the Council to prepare and publish a document known as a “charging schedule” which will set out the rates of Community Infrastructure Levy which will apply in the authority’s area. The charging schedule should be consistent with and support the implementation of the up to date relevant plan. Following publication, the Charging Schedule can be revised at any time by the Council, but will need to undergo public consultation and examination.
- 2.0 TYPES OF DEVELOPMENT THAT IS LIABLE TO PAY CIL
- 2.1 In accordance with the CIL Regulations, most new development could be liable to pay a CIL charge where planning permission falls after the adoption of the charging schedule. CIL is levied on the landowner or developer at the time of the planning permission and collected at the commencement of development. Charges apply to development which creates net additional floor space, where the gross internal area of new buildings (or extensions to existing building) are over 100 square metres. There is no minimum size threshold for new houses or flats, which will pay a charge, regardless of size.
- 3.0 HOW DOES THE COUNCIL SET A CIL CHARGE?
- 3.1 The process which an authority must go through in order to adopt a Community Infrastructure Levy is set out in the CIL Guidance as follows:

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| | |
|---|---|
| 1 | Prepare evidence base (infrastructure and viability) ensuring collaboration with neighbouring authorities |
| 2 | Preparation of a Preliminary Draft Charging Schedule |
| 3 | Consultation process takes place |
| 4 | Charging authority prepares and publishes a draft charging schedule |
| 5 | Period of further representations based on the published draft |
| 6 | An independent person (the “examiner”) examines the charging schedule in public |
| 7 | The examiner’s recommendations are published |
| 8 | The charging authority considers the examiner’s recommendations |
| 9 | The charging authority approves the charging schedule |

- 3.2 As set out in paragraphs 1.3 to 1.4 of the previous report, the government has recently consulted on proposed reforms to the CIL process. Amongst a range of potential changes to the CIL regulations, the government is proposing to remove the requirement on councils to undertake two rounds of consultation as part of the preparation of the charging schedule. Instead authorities will need to show that they have sought an “appropriate level of engagement”.
- 3.3 Arun District Council has engaged with the development industry as part of the preparation of the PDCS in 2015. This included sending out questionnaires and meeting with developers to discuss the variables used in the viability evidence. Further stakeholder engagement in relation to viability was also carried out as part of the preparation of the Local Plan viability evidence base. This included a stakeholder workshop which included a presentation from the viability consultant covering viability assumptions and the viability testing methodology. The workshop resulted in detailed feedback from the development industry which fed into the Local Plan Viability evidence.
- 3.4 Given the level of engagement that the council has already carried out in the preparation of the CIL charging schedule, it is suggested that the council should submit the PDCS directly for Examination. This is subject to the reforms outlined in para 3,2 being taken forward into amended CIL regulations within a timeframe that allows the authority to accelerate the CIL process. This would also be subject to the representations received as part of the PDCS consultation. This is proposed to ensure that the council can submit a CIL which has undergone proportionate consultation and has been prepared on recently gathered market evidence. Furthermore, it is important for the council to aim to adopt a CIL as soon as possible to ensure that it can start receiving CIL receipts.
- 4.0 CONSIDERATIONS IN SETTING THE CIL CHARGE
- 4.1 In setting the Levy, legislation requires that the Council “must strike an appropriate balance between the desirability of funding infrastructure to support development and the potential effects of imposing a charge on the economic viability of development taken as a whole”. In other

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words, whilst the Council will clearly want to maximise the funding available to support infrastructure provision, it needs to set the rates at a level which will not prevent economic growth.

- 4.2 This balance is important to meet the Council's own priorities to support the local economy and create sustainable communities, as set out in the ALP. It is also important because the draft Charging Schedule will be independently examined to ensure that this balance has been correctly struck, and this examination has to be successful to enable the Council to implement a Community Infrastructure Levy.
- 4.3 To ensure that an appropriate balance is struck, when a charging authority submits its draft charging schedule to the Community Infrastructure Levy Examination, it must provide evidence on economic viability and infrastructure planning. The findings of the viability evidence were set out in the previous Evidence Base Update report and recommended a rate which considers a wide range of economic factors and policy requirements in order to strike the appropriate balance.

5. RECOMMENDED CIL RATES

- 5.1 Based on the evidence prepared in the CIL Viability Update (July, 2018), the following CIL Rate is proposed in the Preliminary Draft Charging Schedule, which is also provided in tables 6.1 and 7.1 of the Preliminary Draft Charging Schedule:

| | |
|--------|---|
| Zone 1 | The strategic sites at Pagham South, Pagham North, West of Bersted, BEW, Fontwell, Yapton, Ford, Climping, LEGA and Angmering North |
| Zone 2 | Within the urban boundaries in the Northern Area – being <i>that area to the north of the A259, North Bersted Bypass</i> |
| Zone 3 | Not within the urban boundaries in the Northern Area – being <i>that area to the north of the A259, North Bersted Bypass</i> |
| Zone 4 | Within the urban boundaries in the Coastal Area – being <i>that area to the south of the A259, North Bersted Bypass</i> |
| Zone 5 | Not within the urban boundaries in the Coastal Area – being <i>that area to the south of the A259, North Bersted Bypass</i> |

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| Table 2 - Recommended Rates of CIL (CIL Viability Update, July 2018) | |
|---|----------------------------|
| Development Type | Maximum Rate of CIL |
| Residential | |
| Zone 1 (Strategic Sites) | £0/m ² |
| Sites of 10 and fewer units | |
| Zone 2 and 3 | £150/m ² |
| Zone 4 and 5 | £100/m ² |
| Sites of 11 and more units | |
| Zone 2 | £70/m ² |
| Zone 3 and 5 | £100/m ² |
| Zone 4 | £0/m ² |
| Flats | |
| Zone 2 and 3 | £100/m ² |
| Zone 4 and 5 | £0/m ² |
| Older People's Housing | |
| Zone 2 and 3 | £70/m ² |
| Zone 4 and 5 | £0/m ² |
| Retail Development | |
| Shops | £0/m ² |
| Supermarkets, Retail Warehouse | £110/m ² |
| All Other Development | £0/m ² |

6. INTERACTION BETWEEN CIL AND S106

- 6.1 Once it is adopted the CIL will be the main process for collecting infrastructure funding from developers to support strategic and cumulative growth in the District. This excludes the strategic housing allocations in the Arun Local Plan where S106 costs will be higher to deliver infrastructure requirements. CIL will work alongside a scaled-back section 106 regime that will still be used to secure affordable housing provision and site specific mitigation measures necessary to make development proposals acceptable in planning terms.
- 6.2 Section 278 agreements will also continue to be used to secure necessary highway improvements to make developments acceptable in planning terms.
- 6.3 Regulation 123 of the Community Infrastructure Levy Regulations requires charging authorities to publish a list of those projects or types of infrastructure that it intends to fund through the levy. Infrastructure items on this list should not be funded through Section 106 agreements.

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- 6.4 Regulation 123 limits the use of planning obligations where there have been five or more obligations in respect of a specific infrastructure project or a type of infrastructure entered into on or after 6 April 2010. The Supporting housing delivery through developer contributions consultation has proposed to remove the limitation on S106 where authorities have a CIL in place.

7. DISCRETIONARY MATTERS

- 7.1 The CIL Regulations allow for discretionary matters to be considered by charging authorities. They are summarised here:
1. Whether the Council should permit the payment of CIL by instalments – this will give the Council flexibility in dealing with certain applications, particularly larger phased developments;
 2. Whether the Council should offer discretionary relief for *exceptional* circumstances – this would provide the Council with some flexibility to deal with individual sites where development is desirable, but which are proved to have *exceptional* costs or other requirements which make them unviable. The powers to offer relief can be activated and deactivated at any point after the charging schedule is approved. This is a matter to be considered following the adoption of a charging schedule;
 3. To allow the transfer of land to the Council as payment in kind to offset the chargeable amount of the Community Infrastructure Levy – this will help the Council obtain land for community facilities within large sites. Values are proposed to be determined by the District Valuer; and
 4. Whether to offer discretionary charitable relief.
- 7.2 These matters are optional and can be activated or deactivated at any time by the charging authority. It is proposed that the Preliminary Draft Charging Schedule consults on an instalments policy. However, discretionary relief for the remaining matters listed above can be considered following adoption of a charging schedule.
- ## 8. PREDICTING FUTURE CIL INCOME
- 8.1 The Infrastructure Delivery Plan identifies a total funding gap of approximately £270 million based on known infrastructure costs. If expected S106 costs from the strategic sites are taken from this figure, the gap reduces to approximately £49 million.
- 8.2 There are a number of variables that make it difficult to estimate the likely amount of funding that will be generated by the Community Infrastructure Levy over the plan period 2011-2031. It is not possible to present an accurate figure given various uncertainties such as development rates and planning permissions issued prior to CIL being in force. However, based on the Housing and Economic Land

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Availability Assessment only, it is estimated that CIL receipts could total approximately £30 million.

- 8.3 The CIL Regulations require that 15% of Community Infrastructure Levy Revenue received by the charging authority will be passed directly to Parish and Town Council where development has taken place. But the amount is limited to £100 per existing council tax dwelling. In areas with an adopted neighbourhood plan in place prior to when planning permission first permits development 25% of Levy receipts will be passed over, there are no limits to the amount passed over in this case.
- 8.4 The neighbourhood funding element can be spent on a wider range of things than general levy funds, provided it meets the requirement to 'support the development of the area'.

9. CONSULTATION AND NEXT STEPS

- 9.1 As set out above, the CIL Regulations currently require the District Council to carry out two stages of consultation on the proposed CIL Charging Schedule. The first of these, the Preliminary Draft Charging Schedule, will be subject to a 6 week consultation period, starting on the 12th November 2018 to 7th January 2019 at 5pm.
- 9.2 Following this consultation, the Council will review the comments received with a view to preparing a final charging schedule in early 2019. Changes to the CIL regulations will be taken into account when considering the next steps for the charging schedule consultation/submission process, as set out above in paragraphs 3.2-3.4.

10. CONCLUSION

- 10.1 This report sets out an introduction to the work undertaken to date to prepare a Community Infrastructure Levy for Arun District. The report confirms that a CIL rate will be viable (based on the viability evidence update), and sets out some of the most significant issues surrounding the implementation of CIL and delivery of infrastructure in Arun.
- 10.2 Section 5.0 of the report sets out the proposed CIL rates for Arun that have been derived using the available evidence.
- 10.3 The report recommends that the Sub-Committee recommends to Full Council to publish the Preliminary Draft Charging Schedule, as set out in Appendix 1 for public consultation.

Contact: Nicki Faulkner ext: 37645 nicki.faulkner@arun.gov.uk

Appendices:

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Appendix 1: Preliminary Draft Charging Schedule Consultation Document
(September, 2018)

Arun Preliminary Draft Charging Schedule 2018

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1 Consultation Details

1 Consultation Details

1.1 This consultation on the Arun Preliminary Draft Charging Schedule (PDCS) 2018 is the first stage in preparing a CIL Charging Schedule. All responses will be considered before a draft Charging Schedule is prepared for further consultation and independent examination.

1.2 Comments on the Preliminary Draft Charging Schedule should be made via the Consultation Portal on Objective XXXinsert linkXXX or emailed to Localplan@arun.gov.uk

1.3 Written comments can also be sent to the following address:

- Planning Policy and Conservation, Arun District Council, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

1.4 For any queries, call 01903 737500

1.5 This document will be published for a six week consultation period starting **12th November 2018 to 5pm on 7th January 2019**

2 Introduction

2 Introduction

2.1 This consultation document sets out Arun District Council's proposed charging rates for its Community Infrastructure Levy (CIL). This mechanism for the collection of funding for infrastructure was introduced under the Planning Act 2008 and enables local authorities to make a charge on most forms of new development to fund infrastructure needed to support growth.

2.2 Before a Charging Authority is able to adopt a Charging Schedule, it is required to undertake two formal rounds of consultation followed by an Independent Examination. The consultation process provides an opportunity for respondents to assist in shaping the Charging Schedule.

2.3 This is the second time Arun District Council have published and consulted on a Preliminary Draft Charging Schedule (PDCS). The first PDCS went through a consultation period from March - April 2015. However, work on the CIL charging schedule was put on hold following the suspension of the Arun Local Plan examination in February 2016.

2.4 Following the adoption of the Arun Local Plan 2011-2031 (July, 2018), a number of main modifications to the submitted Local Plan have been adopted. These have been supported by additional viability and infrastructure evidence and have included further strategic site allocations. Therefore, it is considered appropriate to prepare a new PDCS for consultation.

2.5 Preparation of the PDCS has been informed by the Arun Infrastructure Capacity Study and Delivery Plan (February, 2017) (ICSDP, 2017), the Arun Local Plan Viability Assessment (HDH Planning and Development, February 2017) (LPVA, 2017) and the Arun CIL Viability Update (HDH Planning and Development, July 2018) (CILVU, 2018). Further detail is provided within this document regarding the preparation of the evidence base. These documents are also available on the council's website www.arun.gov.uk/cil

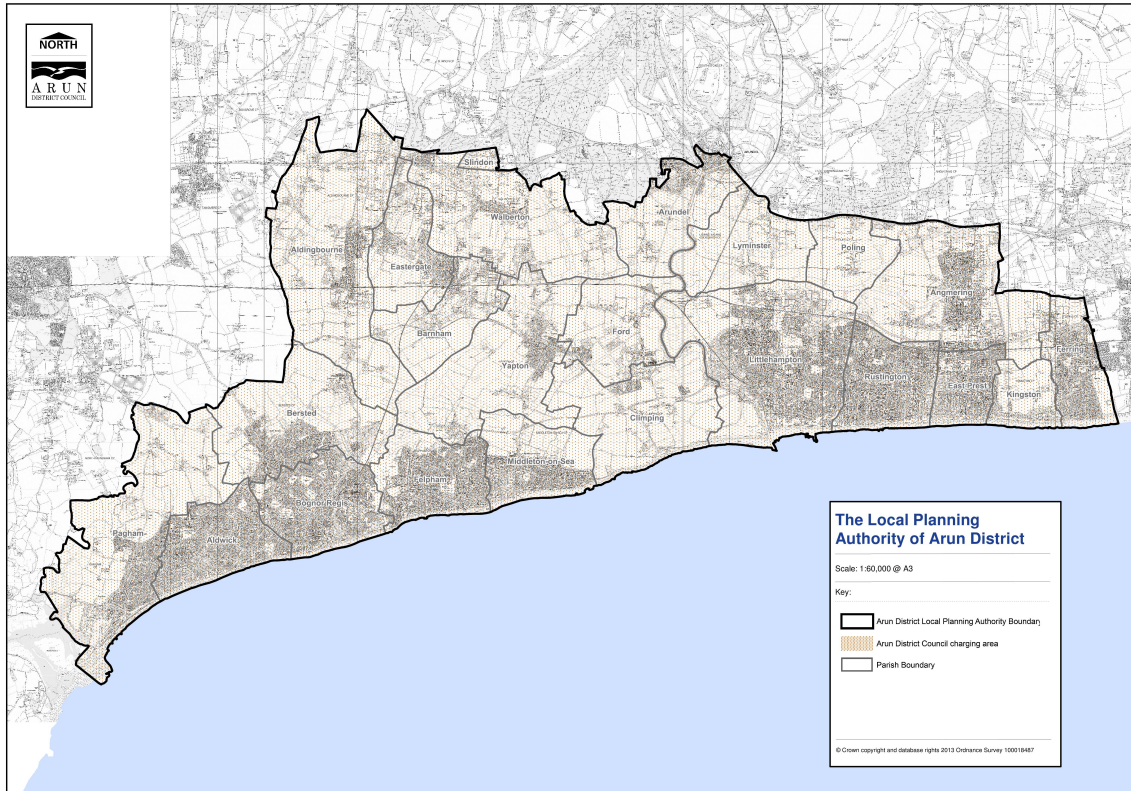
2.6 The CIL Guidance requires that charging authorities will implement the levy where their evidence has been prepared based on a relevant Plan (the Local Plan). Arun District Council adopted the Arun Local Plan 2011-2031 (July, 2018) on 18th July 2018. The Plan identifies the quantum and type of development planned to meet housing and employment needs within the district over the Plan period. It also allocates strategic housing and employment sites. The Local Plan is underpinned by the ICSDP, 2017 which identifies the infrastructure required to achieve local development and growth needs.

2.7 This PDCS has been prepared in accordance with the Community Infrastructure Levy Regulations 2010 (as amended) and with CIL guidance. Following completion of the CILVU, 2018, the Planning Practice Guidance for Viability and NPPF (2018) were published. The evidence was prepared in light of the consultation on Viability, however, any further updates required to the evidence as a result of the guidance will be identified through this consultation process.

3 The Charging Area

3 The Charging Area

3.1 The charging area covers all of Arun District with the exception of the areas of the South Downs National Park located to the north of the district. This is due to the fact that the National Park Authority is a local planning authority in its own right.



4 What is CIL?

4 What is CIL?

4.1 The legislative framework for CIL is provided by Part II (Sections 205-225) of the Planning Act 2008 and the CIL Regulations 2010 subject to subsequent amendments.

4.2 CIL is a mandatory charge on development, calculated on the change in net additional floorspace (m²), which local authorities can introduce. The charge is non-negotiable in most circumstances. It applies to development of over 100m² of gross internal floorspace or the creation of one or more dwelling(s).

4.3 Charges are set by the Council through publication of a Charging Schedule. The charges must be supported by evidence that an infrastructure funding gap exists (taking into account other funding sources) and that it does not prejudice the viability of development across the district as a whole. Charges are index linked to build costs which means that CIL payments must be increased or decreased (index linked) to reflect changes in the costs of building houses and delivering infrastructure between the year that CIL was introduced to the year that planning permission is granted. The index used is the national All-in Tender Price Index published by the Build Cost Information Service (BCIS).

4.4 The CIL Guidance (Last updated, March 2018) states that in setting CIL rates, the charging authority "will need to be able to show why they consider that the proposed levy rate or rates set an appropriate balance between the need to fund infrastructure and the potential implications for the economic viability of development across their area."

4.5 The process through which an authority needs to go through in order to adopt a CIL is as follows:

- the charging authority prepares its evidence base in order to prepare its draft levy rates, and collaborates with neighbouring/overlapping authorities (and other stakeholders)
- the charging authority prepares a preliminary draft charging schedule and publishes this for consultation
- consultation process takes place
- the charging authority prepares and publishes a draft charging schedule
- period of further representations based on the published draft
- an independent person (the "examiner") examines the charging schedule in public
- the examiner's recommendations are published

4 What is CIL?

- the charging authority considers the examiner's recommendations
- the charging authority approves the charging schedule

4.6 There is a considerable degree of flexibility permitted in the spending of CIL monies, It must be spent on the provision of new infrastructure (rather than remedying existing deficiencies). Infrastructure is defined widely in the Planning Act 2008 and includes transport, education, health, open space/green infrastructure, police/community safety, flood defences for example.

4.7 Revenues can be passed to other bodies to deliver infrastructure. A schedule of infrastructure to be funded by CIL should be published alongside the Charging Schedule, at examination, in accordance with Regulation 123 of the CIL Regulations 2010. CIL guidance (2014, last updated March 2018) sets out that when an authority introduces the levy, section 106 requirements should be scaled back to those matters that are directly related to a specific site, and are not set out in a regulation 123 list. Section 106 agreements will still be used to cover non-infrastructure requirements such as the provision of affordable housing, local open space, access roads, habitat protection etc. Further detail regarding the Council's approach to CIL and Section 106 will be provided in an Affordable Housing and Planning Contributions Supplementary Planning Document (SPD).

4.8 Transparency on the spending of CIL is required by the CIL Regulations 2010. Further detail regarding monitoring of CIL spending is set out in section 10 below.

4.9 The CIL Guidance sets out the neighbourhood portion of CIL which means that a portion of CIL money is passed back to the Town or Parish Council's where development takes place. The portion of CIL money passed back differs based on whether the Parish or Town Council has an adopted neighbourhood plan as follows:

| Neighbourhood Plan? | Portion of Levy |
|---------------------|--|
| Yes | 25% uncapped, paid to parish/town council |
| No | 15% capped at £100/dwelling, paid to parish/town council |

Table 4.1

5 Infrastructure Evidence

5 Infrastructure Evidence

5.1 As set out above, in preparing a charging schedule, there is a need to demonstrate that there is a funding gap in the provision of infrastructure required to support new development.

5.2 The CIL Guidance states that: "Charging authorities must identify the total cost of infrastructure they wish to fund wholly or partly through the levy...Information on the charging authority area's infrastructure needs should be drawn from the infrastructure assessment that was undertaken as part of preparing the relevant Plan...".

5.3 The infrastructure evidence which underpins the Arun Local Plan 2011-2031 (July, 2018) was published in February 2017. The ICSDP, 2017 identifies site specific infrastructure requirements as well as district wide infrastructure needs resulting from planned growth in the district. Based on total estimated infrastructure costs and existing funding secured, there is a total infrastructure funding gap of approximately £270 million. However, based on estimated S106 contributions from the eleven strategic sites, allocated in the ALP, this funding gap reduces to £49 million.

5.4 Table 5.1 shows a significantly high level of S106 expected to fund infrastructure requirements. This is due to the fact that the infrastructure required for each strategic allocation will largely be delivered by means of S106 agreements. Although, there may be challenges involved in delivering strategic infrastructure for the larger strategic sites in light of the pooling restrictions set out by Section 123 of the CIL Regulations, it is anticipated that changes to the pooling restrictions in the future (as proposed in the Supporting housing delivery through developer contributions consultation) will assist with the council's approach. Table 5.1 below summarises the main infrastructure items needed to support the Arun Local Plan 2011-2031 and shows the approximate funding gap.

5.5 The CIL Guidance requires that the charging authority should set out at examination a draft list of the projects or types of infrastructure that are to be funded in whole or in part by the levy as well as those known site specific matters where section 106 contributions will be sought. The ICSDP, 2017 including any further updates, resulting from this consultation will enable this list to be prepared, which will accompany the charging schedule at examination.

5.6 The funding gap demonstrates that there is a sufficient funding shortfall that must be filled in order to deliver the infrastructure to support growth in the district (based on the Infrastructure Delivery Plan, 2017). This justifies the preparation of a CIL charging schedule. The council will actively seek additional sources of funding where they may be available in order to reduce the infrastructure gap. It should be noted that the ICSDP, 2017 is a 'living document' and can be updated on a rolling basis. In particular, the evidence will need to take account of local infrastructure

5 Infrastructure Evidence

requirements as the council moves forward with the preparation of the Non-Strategic Sites DPD (the NSS). It is anticipated that most infrastructure needs will be on-site S106 but cumulative/strategic infrastructure may require CIL receipts.

| Category | Total estimated cost (£million) | Existing Funding Available/Secured (£million) | Expected S106 Funding (£million) | Funding Gap (£million) |
|-----------------------------------|---------------------------------|---|----------------------------------|------------------------|
| Primary Education | £77 | £0 | £77 | £0 |
| Secondary Education | £47 | £0 | £47 | £0 |
| Early years/childcare facilities | £14 | £0 | £14 | £0 |
| Social and Leisure facilities | £46 | £15 | £0 | £31 |
| Healthcare | £14 | £0 | £14 | £0 |
| Green Infrastructure and Habitats | £16 | £0 | £4 | £12 |
| Waste Management | £6 | £0 | £0 | £6 |
| Emergency Services | tbc | tbc | tbc | tbc |
| Flood Risk Mitigation | £35 | £0 | £35 | £0 |
| Utilities | £3 | £0 | £3 | £0 |
| Transport | £38 | £13 | £25 | £0 |
| Totals | £296 | £28 | £219 | £49 |

Table 5.1

6 Viability Evidence

6 Viability Evidence

6.1 CIL is expected to have a positive economic effect on development across the area by providing additional infrastructure to support development. In deciding the rates of the council's levy, a key consideration is the balance between securing additional investment for infrastructure to support development and the potential economic effect of imposing the levy upon development across their area.

6.2 Charging Authorities are therefore required to arrive at an appropriate balance between the desirability of funding infrastructure through CIL and not adversely impacting on the deliverability of planned development. To inform this judgement, the District Council has commissioned a viability evidence.

6.3 In January 2015 GL Hearn prepared the Arun Viability Report which informed the council's first PDCS (consulted on in 2015). Since 2015, further viability evidence has been commissioned to underpin the Arun Local Plan main modifications.

6.4 The Local Plan Viability Assessment Update (LPVU, 2017) was prepared by HDH Planning and Development in January 2017 and assessed the viability of the Arun Local Plan, in particular taking into account policy requirements including affordable housing and the viability of the strategic allocations within the plan in light of policy and infrastructure requirements. The LPVU, 2017 was examined during the Local Plan hearings and the Inspector made numerous references to it. On this basis the viability evidence is sound and an appropriate starting point for the preparation of an update to the CIL viability evidence base.

6.5 Subsequently, an annex to the LPVU, 2017 was prepared in July 2018 to consider the scope for CIL rates for those parts of Arun District outside of the South Downs National Park (The CIL Viability Update, July, 2018) (HDH Planning and Development)) (CILVU, 2018). These studies are available to view at www.arun.gov.uk/cil

6.6 The CILVU, 2018 uses the methodology set out in Chapter 3 of the LPVU, 2017 which uses a residual value calculation to assess a range of different development typologies represented within the council's Housing and Employment Land Availability Assessment (HELAA). The CILVU, 2018 ensures that all factors involved in the viability assessment are up to date by reviewing the impact of policy and market change since the LPVU, 2017. This includes changes to national and local policy, market changes such as residential values, affordable housing values, older people's housing, student housing, non residential values and development land values. The report also considered changes to development costs including construction costs, developer returns and strategic infrastructure and mitigation costs.

6.7 The report was also prepared whilst the government were consulting on changes to the NPPF, Planning Practice Guidance for Viability and a broad consultation *Supporting housing delivery through developer contributions- Reforming developer contributions to affordable housing and infrastructure* (MHCLG, March

6 Viability Evidence

2018). The consultants have set out how the viability methodology takes into account the proposed changes to guidance and policy. Any further changes to be considered following the publication of the final NPPF, PPG and subsequent amendments to the CIL regulations will need to be addressed following this consultation.

6.8 The CILVU, 2018 models a number of development sites (residential and non-residential) and considers variations in land values and development costs across the district. From this the impact of CIL is inferred and variable rates have been identified. The CIL Guidance is clear that CIL should not be set at the limits of viability. In considering the rates of CIL it has been assumed that the Residual Value should generally be 50% above the Viability Threshold.

6.9 The consultants conclusions resulting from the evidence identify five geographical zones within the district with significantly different viability characteristics as set out in Table 2 below. In particular, the study identifies differential values between sites within and outside the urban areas (shown on the Local Plan policies maps as the Built up area boundaries, excluding the strategic allocations) and between the northern and the coastal parts of the district (north and south of the A259). The consultants have also undertaken a more detailed viability assessment of the strategic housing allocations in the ALP and have identified that infrastructure costs associated with these sites justify a separate charging zone.⁽¹⁾ The study has also found that on sites where the provision of affordable housing is a policy requirement (sites of 11 units or more), viability varies across the district.

6.10 In respect of commercial development, the evidence resulting from the viability study recommends that the majority of uses are unable to pay CIL with the exception of supermarkets and the retail warehouse format. Table 6.1 overleaf shows and describes the zones.

1 It should be noted that in the case of the CIL charging schedule zones, the strategic housing allocation sites included in Zone 1 are separated from the built up area boundary (BUAB). This is in contrast to the Local Plan Policy Maps which include the strategic allocations within the BUAB. This differentiation only applies to the CIL Charging Schedule and does not infer changes to the Local Plan policies maps

6 Viability Evidence

| Zone | Characteristics |
|--------|---|
| Zone 1 | The strategic sites at Pagham South, Pagham North, West of Bersted, BEW, Fontwell, Yapton, Ford, Climping, LEGA and Angmering North |
| Zone 2 | Within the urban boundaries in the Northern Area - being that area to the north of the A259 |
| Zone 3 | Not within the urban boundaries in the Northern Area - being that area to the north of the A259 |
| Zone 4 | Within the urban boundaries in the Coastal Area - being that area to the south of the A259 |
| Zone 5 | Not within the urban boundaries in the Coastal Area - being that area to the south of the A259 |

Table 6.1

6.11 Paragraph 7.52 and Table 7.3 of the CILVU, 2018 set out the recommended CIL charging zones and CIL charging rates.

7 The Preliminary Draft Charging Schedule

7 The Preliminary Draft Charging Schedule

7.1 Having had regard to all the evidence produced to support the preparation of the Preliminary Draft Charging Schedule, as summarised above, the Council's proposed charging rates are as follows:

| Development Type | Site Size | Zone | Maximum Rate of CIL |
|---|-----------------------------|--------------|---------------------|
| Residential | | | |
| | N/A | Zone 1 | £0/m ² |
| | Sites of 10 and fewer units | Zone 2 and 3 | £150/m ² |
| | Sites of 10 and fewer units | Zone 4 and 5 | £100/m ² |
| | Sites of 11 and more units | Zone 2 | £70/m ² |
| | Sites of 11 and more units | Zone 3 and 5 | £100/m ² |
| | Sites of 11 and more units | Zone 4 | £0/m ² |
| Flats | | | |
| | N/A | Zone 2 and 3 | £100/m ² |
| | N/A | Zone 4 and 5 | £0/m ² |
| Older People's Housing Sheltered Housing and Extracare housing | | | |
| | N/A | Zone 2 and 3 | £70/m ² |
| | N/A | Zone 4 and 5 | £0/m ² |
| Retail | | | |
| Town Centre Shops | N/A | N/A | £0/m ² |
| Supermarkets and Retail Warehouse | N/A | N/A | £110/m ² |
| All other development | N/A | N/A | £0/m ² |

Table 7.1

NOTES

7.2 The Charging Zones are mapped on the plan in Appendix 1 - Charging Zones Map.

7 The Preliminary Draft Charging Schedule

7.3 Older People's Housing is discussed in the LPVU, 2017. Paragraphs 4.67 - 4.70 of the report provides descriptions of the types of accommodation that this includes: "Sheltered or retirement housing is self-contained housing, normally developed as flats and other relatively small units. Where these schemes are brought forward by the private sector there are normally warden services and occasionally non-care support services (laundry, cleaning etc.)...Extracare housing is sometimes referred to as very sheltered housing or housing with care...".

7.4 Supermarket should be defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix. The majority of custom at supermarkets arrives by car, using the large adjacent car parks provided. (see paragraph 7.11 of CILVU, 2018)

7.5 Retail warehouse should be defined as large stores specialising in the sale of comparison goods (such as carpets, furniture, and electrical goods) DIY items and other ranges of goods catering mainly for car borne customers. (see paragraph 7.11 of CILVU, 2018)

7.6 These rates have been prepared with a viability buffer of 50% over and above the viability threshold.

7.7 The rates have also been calculated as a proportion of land value (less than 25%) and as a proportion of Gross Development Value (less than 5%).

8 Draft Instalments Policy

8 Draft Instalments Policy

8.1 The importance of allowing CIL to be paid through the life of a project was raised. The analysis in the CIL Update Report (July, 2018) is therefore based on the assumption that CIL is paid through the life of the schemes. The following instalment policy is suggested in the report and presented below for comment:

| Amount of CIL | Number of Instalments | Payment periods and amount |
|--|-----------------------|--|
| Any amount less than £10,000 | One payment | Total amount payable within 60 days of commencement of development |
| Amount equal to £10,000 or less than £50,000 | Three instalments | 60 days, 120 days and 180 days |
| Amount equal to £50,000 or less than £100,000 | Four instalments | 60 days, 180 days, 360 days and 540 days |
| Amount higher than £100,000 | Five instalments | 60 days, 180 days, 360 days, 540 days and 720 days |
| In any event CIL will be paid before a unit is occupied. | | |

Table 8.1

9 Exemptions and Relief

9 Exemptions and Relief

9.1 In accordance with the CIL Regulations, certain types of development are exempt from liability to pay a CIL charge. These include the following:

- minor development eg. an extension to an existing building where the gross internal area of new build will be less than 100 square metres,
- residential annexes or extensions,
- self build housing and
- charitable development eg. where a development is occupied or under the control of a charitable institution.

9.2 Social Housing development is eligible for relief from liability to pay CIL. This means that although social housing is not exempt from liability to pay a CIL charge, relief from the CIL charge can be applied for a development which qualifies under the definition of social housing.

9.3 Finally, charging authorities are able to give certain other types of development relief from liability to pay a CIL charge. This is called discretionary relief. Discretionary relief can be given on the following types of development:

- discretionary charitable relief: investment activities
- discretionary relief for exceptional circumstances
- discretionary social housing relief

9.4 The council will consider whether to implement discretionary relief following adoption of the Charging Schedule

10 Annual Monitoring

10 Annual Monitoring

10.1 The council will monitor CIL income on an annual basis and publish a report in accordance with Regulation 62A of the CIL (Amendment) 2013 Regulations.

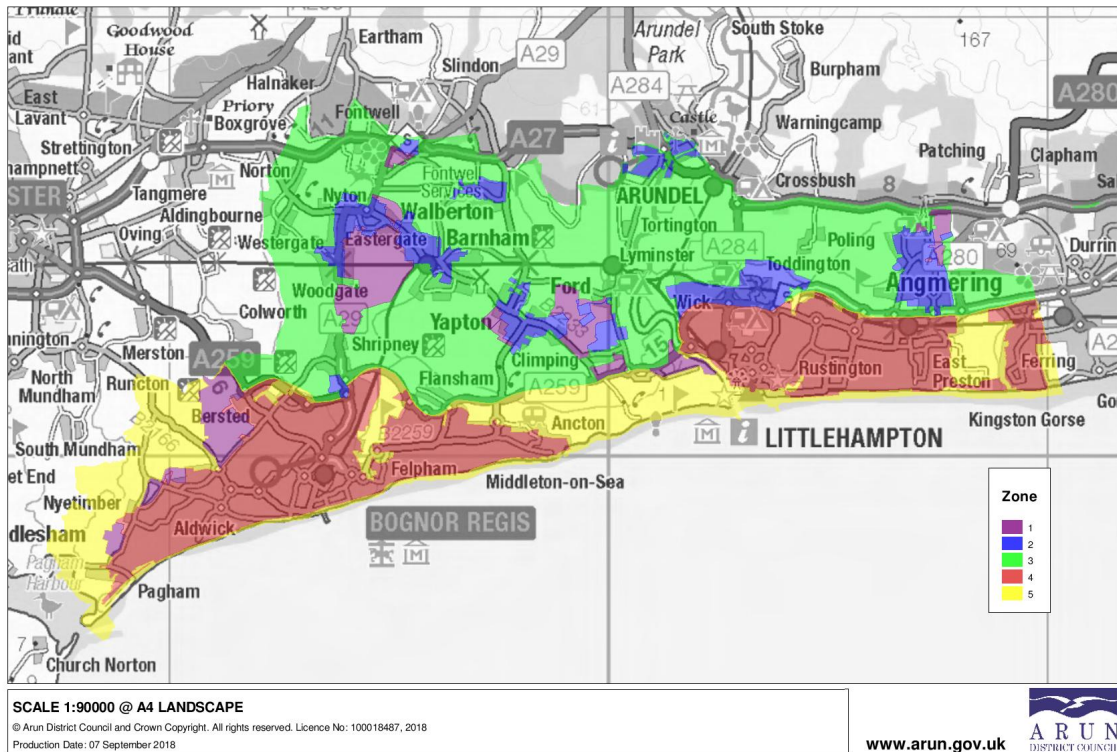
10.2 Where the council have pooled the levy and/or combined it with other sources of funding for investment in strategic infrastructure, the council will show how the various contributions have been committed.

10.3 Where parish and town councils receive a portion of the levy, the income and spending must be reported the Parish and Town councils in accordance with regulation 62A of the CIL (Amendment) 2013 Regulations.

11 Appendix 1 - Charging Zones Map

11 Appendix 1 - Charging Zones Map

CIL CHARGING ZONES



Map 11.1

AGENDA ITEM NO. 8**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT**

| |
|---|
| SUBJECT: Housing and Economic Land Availability Assessment (Update 2018) |
|---|

| |
|--|
| REPORT AUTHOR: Kathryn Banks, Principal Planning Officer DATE: November 2018 EXTN: x 37579 PORTFOLIO AREA: Planning |
|--|

EXECUTIVE SUMMARY:

The Council has reviewed and updated its Housing and Economic Land Availability Assessment (HELAA). This document provides the Council with a database of sites within the District.

The production of a HELAA is a requirement of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG). It should be updated on an annual basis to ensure it remains current and while the District has a 5.3 year housing supply based on the adopted Arun local Plan July 2018 which is defensible for a year (i.e. up to October 2019) it will be necessary to amend the HELAA methodology in future years in order to meet a new definition test for deliverable sites - pending the outcome of the Government's technical consultation on this test which will subsequently update the PPG.

Each site within the database has been assessed to determine whether it is deliverable, developable or not currently developable according to current HELAA methodology. 29 new sites have been identified for this year's HELAA. These include sites that were submitted to the Council as part of the Call for Sites exercise, but also sites that the Council has identified. It does not include commitments. Of these new sites, 16 were identified as being Deliverable and 7 were identified as being Developable. The remaining 6 sites were identified as being Not Currently Developable. The new sites have the potential to accommodate 2285 units based on Adopted Local Plan 2018 methodology to establish viable net developable areas.

It is important to note that whilst the HELAA is a useful resource, it does not allocate sites, nor does it grant planning permission.

RECOMMENDATIONS:

The Planning Policy Sub-Committee is recommended to:-

Note the Housing and Employment Land Availability Assessment as part of the evidence base for the Local Plan and any future Development Plan Document preparation.

1. BACKGROUND:

- 1.1 In line with national policy, the Council is required to be proactive and to plan positively to ensure that the development needs of the district are met in a sustainable way. This requires clear and robust evidence.
- 1.2 An assessment of land availability is an essential part of the evidence base in preparing the Local Plan and other Development Plan Documents; and will help to identify a future supply of land which is deliverable or developable for both housing and employment land uses.
- 1.3 Paragraph 67 of the National Planning Policy Framework (NPPF) (2018) requires a Local Planning Authority to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 1.4 The updated NPPF July 2018 introduces a more detailed requirement to test the status of sites (i.e. the definition of 'deliverable sites' in Annex 2 to the NPPF) through land availability studies such as the HELAA. However, the NPPF was only published in late July and there was also a recent Government technical consultation on how the definition of 'deliverable sites' will be applied. It is not therefore, possible, reasonable or appropriate to accommodate these changes in the HELAA 2018. Furthermore, any revised HELAA methodology to accommodate such changes will necessitate the allocation of new resources and new monitoring procedures with all developers and landowners and can only therefore, be a feasible introduction for the next HELAA update in 2019/20. The HELAA 2018 is consistent with current practice in support of the adopted Arun Local Plan July 2018 (for which the Independent Inspector's report concluded that Arun has a 5.3 year housing supply). NPPF 2018 paragraph 74 clearly states that an authority with a recently adopted Local Plan can defend its 5 year housing land supply with an appropriate buffer, for a year – i.e. in Arun's case - up until October 2019.
- 1.5 The Planning Practice Guidance (PPG), which was published in March 2014 and is continually updated, recommends that housing and economic evidence should be undertaken as part of the same exercise.
- 1.6 In 2014 officers created the Arun Housing and Employment Land Availability Assessment (HELAA), which was updated in 2016 and 2017. This assessment has subsequently been updated in 2018 to ensure that the information remains current.
- 1.7 The HELAA is an important element of the Council's housing evidence base for the identification of a supply of 'specific, deliverable' sites for years one to five of the plan period; and 'specific, developable sites or broad locations for growth', for years 6-10 and where possible, for years 11-15 of the plan (from the base date of 2018), as required by paragraph 67 clauses a) and b) respectively, of the NPPF.
- 1.8 The HELAA tests the delivery of the housing requirement figure for the district by informing the preparation of a housing trajectory. This will be published with the Authorities Monitoring Report (AMR) in the spring 2019.

Aims of the HELAA

1.9 The overall aim of the HELAA is to:

- Produce of list of sites, cross referenced to maps showing locations of specific sites;
- Provide an assessment of each identified site;
- Identify the potential type and quantity of development that could be delivered on each site; including a reasonable estimate of build out rates; and setting out how any barriers to delivery could be overcome.

1.10 In order to ensure that the HELAA is up to date, officers have reviewed the content of the assessment published in 2017 and prepared an updated version for use alongside the preparation of relevant planning policy documents.

Methodology

1.11 The HELAA update has been prepared according to a methodology prepared by the Council. This methodology follows that prescribed within the PPG and can be found within the HELAA Topic Paper which was published in May 2016 on the Council's website.

Key Issues to Note

1.12 It is important to note that the HELAA:

- Does not form part of the Development Plan and does not allocate sites for development nor preclude those sites not identified from coming forward for planning permission in the future
- Does not provide a relative assessment of sites against each other and does not provide any ranking or order of preference. Each site is appraised on its own merits.
- Does not indicate that planning permission will be granted for housing development if a site is included in the HELAA. It is not intended to pre-empt any plan making or other planning related decisions and does not indicate that planning permission should be granted or not granted for housing or any other use on any identified site.

1.13 In addition, it should be noted that:

- Inclusion of a site in the HELAA does not mean that it will be allocated for development.
- Planning applications on sites identified within the HELAA will continue to be determined on their merits in line with the development plan unless material considerations indicate otherwise. The HELAA may however form a material consideration in the determination of planning applications.

Site identification

1.14 The main method of identifying sites is through an annual call for sites exercise which provided an opportunity for landowners, site promoters and interested parties to submit land for consideration. Another method of identifying sites is through the Council's planning weekly lists.

Site Assessment

1.15 All sites within the HELAA are subject to assessment. The Site assessment draws out further information about each site and its potential suitability for housing/employment development.

1.16 Sites are classified in the HELAA as follows:

- Deliverable: to be considered 'deliverable' sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. These sites are coloured BLUE on the HELAA map.
- Developable: to be considered 'developable' sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. These sites are coloured ORANGE on the HELAA map.
- Not currently developable: if it is not known when a site could be made available or viably developed, it is considered 'Not Currently Developable' and is coloured RED on the HELAA map.

1.17 These classifications reflect the new NPPF (2018) and the Housing Delivery Test standard, however the Council's HELAA has not gone as far as this at this time due to the reasons set out in paragraph 1.4 above.

1.18 It is important to note that the HELAA is an objective assessment of sites, and that specific locations cannot be excluded from the assessment, or their status amended, due to a lack of public support.

1.19 The result of the site assessments are presented in the main HELAA report according to their HELAA status.

New Sites

1.20 29 new sites have been identified for this year's HELAA. These include sites that were submitted to the Council as part of the 'Call for Sites' exercise, but also sites that the Council has identified. It does not include commitments. Of these new sites, 16 were identified as being 'Deliverable' and 7 were identified as being 'Developable'. The remaining 6 sites were identified as being 'Not Currently Developable'. The new sites have the potential to accommodate 2285 units.

1.21 Details of the new sites are contained within the table below, in Parish order:

| HELAA Ref | Address | Status | Parish | Viability Yield |
|------------------|---|---------------------------|---------------|------------------------|
| 18AL4 | Land at Bridge Cottage and The Old Cottage Lidsey Road | Deliverable | Aldingbourne | 25 |
| 18AL3 | Land west of Hook Lane Aldingbourne | Deliverable | Aldingbourne | 12 |
| 18AL1 | Land east of Hook Lane Aldingbourne | Developable | Aldingbourne | 78 |
| 18A1 | Land west of Bewley Road Angmering | Developable | Angmering | 218 |
| 18BE1 | Land at Chalcraft Cottage (Part of SD3) | Deliverable | Bersted | 22 |
| 18BR2 | Richmond Arms 224 London Road | Deliverable | Bognor Regis | 10 |
| 18EG2 | Bexstone House Barnham Road | Deliverable | Eastergate | 17 |
| 18EG3 | Little Warwick Barnham Road | Deliverable | Eastergate | 7 |
| 18EG1 | Land North of Spode Cottage Eastergate Lane | Deliverable | Eastergate | 28 |
| 18EG4 | Kinnersley Barnham Road | Deliverable | Eastergate | 7 |
| 18FP1 | Land at Stanhorn Grove Felpham | Deliverable | Felpham | 13 |
| 18FG1 | 144 - 148 Littlehampton Road Ferring | Deliverable | Ferring | 18 |
| 18F1 | Waterbury House Ford Lane | Deliverable | Ford | 9 |
| 18F2 | Land to the south of Ford Lane and east of King George V recreation ground Yapton | Developable | Ford | 294 |
| 18K2 | Land east of Kingston House Kingston Lane | Not Currently Developable | Kingston | |
| 18LY3 | Land east of Church Farmhouse Church Lane | Not Currently Developable | Lyminster | |
| 18LY2 | Land to the north of Church Lane Lyminster | Not Currently Developable | Lyminster | |
| 18P1 | Land at Sefter Road Bognor Regis | Deliverable | Pagham | 9 |
| 18P2 | Land west of Pagham Road Pagham | Developable | Pagham | 100 |
| 18P3 | Park Farm Lower Bognor Road | Developable | Pagham | 267 |
| 18WA2 | Land South of Wandleys Farm Wandleys Lane | Not Currently Developable | Walberton | |
| 18WA5 | Former Lanes End House West Walberton Lane | Deliverable | Walberton | 12 |

| | | | | |
|-------|--|---------------------------|--------------|-------------|
| 18WA3 | Walberton House The Street | Not Currently Developable | Walberton | |
| 18WA4 | Land south of Walberton | Deliverable | Walberton | 222 |
| 18WA1 | Cherry Tree Nursery Eastergate Lane | Not Currently Developable | Walberton | |
| 18Y2 | Lambs Field Bilsham Road | Developable | Yapton | 226 |
| 18Y3 | Land to the south of Ford Lane Yapton | Deliverable | Yapton | 303 |
| 18Y4 | Land to the north of Ford Lane Yapton | Developable | Yapton | 380 |
| 18Y1 | Land South of Orchard Business Park North End Road | Deliverable | Yapton | 8 |
| | | | Total | 2285 |

Key Findings

- 1.22 The findings of the HELAA assessment are set out in the Section of the report entitled 'Site Assessment'.
- 1.23 The HELAA indicates a current supply of 50 deliverable sites with capacity for 2,403 dwellings across the Local Planning Authority Area (LPAA). This is in addition to those sites which have been granted planning permission.
- 1.24 In addition, it has identified a potential supply of 49 sites with a yield of 5,853 dwellings which are considered to be developable (i.e. sites that are considered that could come forward over the lifetime of the plan).
- 1.25 180 sites are considered not to be developable at the time of publishing the HELAA.

2. PROPOSAL(S):

To note the Housing and Employment Land Availability Assessment as part of the evidence base for the Local Plan and any future Development Plan Document preparation.

3. OPTIONS:

The following options are available to Members:

- to note the HELAA 2018 update Report as evidence to support monitoring of housing supply and housing delivery
- Not to note the HELAA 2018 update.

4. CONSULTATION:

| Has consultation been undertaken with: | YES | NO |
|---|------------|-----------|
| Relevant Town/Parish Council | | x |
| Relevant District Ward Councillors | X | |
| Other groups/persons (please specify) | | |
| 5. ARE THERE ANY IMPLICATIONS IN RELATION TO | YES | NO |

| | | |
|--|--|----------|
| THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | | |
| Financial | | x |
| Legal | | x |
| Human Rights/Equality Impact Assessment | | x |
| Community Safety including Section 17 of Crime & Disorder Act | | x |
| Sustainability | | x |
| Asset Management/Property/Land | | x |
| Technology | | x |
| Other (please explain) | | x |

6. IMPLICATIONS:

The HELAA is necessary evidence to support monitoring of housing supply and delivery.

7. REASON FOR THE DECISION:

i) To enable evidence to be updated on potential housing and employment land supply and delivery performance in support of the Adopted Local Plan and further plan making to ensure that the needs of the community in Arun are met sustainably.

8. BACKGROUND PAPERS:

Arun Housing and Economic Land Availability Assessment 2017 (HELAA) available on the Council's web site via: <https://www.arun.gov.uk/helaa>

Housing and Economic Land Availability - Mid Examination Topic Paper and HELAA Update Methodology (May 2016) also available via the Council's web site.

AGENDA ITEM NO. 9**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF
PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT****SUBJECT: Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document****REPORT AUTHOR:** Donna Moles, Senior Planning Officer**DATE:** 14 November 2018**EXTN:** X3 7697**PORTFOLIO AREA:** Planning**EXECUTIVE SUMMARY:**

A revised joint Authority Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) has been commissioned to reflect the regulation change to the definition of Gypsies and Travellers and Travelling Showpeople and assess Arun's need on this basis. The GTAA will form the evidence base to inform the allocation of sites through the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) as set out in paragraph 12.7.6 of the adopted Arun Local Plan 2011-2031 in accordance with the revised evidence and to ensure preparation of a 'sound' Development Plan for Arun District.

This report outlines the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations DPD covering the period 2018-2036.

This DPD is to identify and allocate land for permanent pitches to meet the need identified to 2036.

RECOMMENDATIONS:

The Sub-Committee is requested to:

Note the proposed approach and timetable for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) covering the period 2018-2036, including the key outputs of the Gypsy and Traveller Accommodation Assessment (GTAA) Final Report October 2018.

1 BACKGROUND

- 1.1 The Coastal West Sussex Local Authorities of Adur, Arun, Chichester and Worthing together with support from the South Downs National Park Authority previously commissioned a joint Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (April 2013). This study covered the period 2012 to 2027 and has a base date of September 2012. It complied with the Housing Act 2004, the National Planning Policy Framework 2018 (NPPF) and Planning Policy for Traveller Sites (2012). It provided the evidence base for the Arun Local Plan policy H SP5.
- 1.2 The Government updated Planning Policy for Traveller Sites (PPTS) in August 2015 and this included a change to the definition of Gypsies and Travellers, and travelling showpeople. In particular the new definition's key change is the removal of the term persons "... who have ceased to travel permanently..." ie. those who have ceased to travel permanently will no longer fall under the definition of Traveller for accessing accommodation needs for planning purposes. In light of this, a new assessment of accommodation needs was required by the Coastal West Sussex Local Authorities. This assessment is usually known as a Gypsy and Traveller Accommodation Assessment (GTAA). The GTAA will form part of the evidence base and will inform the development of policy and future allocation of sites through the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations DPD.
- 1.3 The evidence on accommodation needs is required to comply with the statutory duties of section 8 of the Housing Act 1985 (as amended by section 124 of the Housing and Planning Act 2016) and was prepared in accordance with national policy including the NPPF 2018, PPTS 2015, the Draft guidance to local housing authorities on the periodical review of housing needs: caravans and houseboats (March 2016) and the Equalities Act 2010. The evidence covers the needs of Gypsies and Travellers as well as the needs of travelling showpeople and the report is appended to this report as Background Paper 1 (Coastal West Sussex Authorities Gypsy and Traveller Accommodation Assessment Final Report October 2018). The baseline date for the study is January 2018 which was when the majority of the household interviews were completed.

GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT (GTAA) STUDY KEY OUTPUTS

- 1.4 It is important to note that the previous GTAA covered the period 2012-2027 and the new GTAA (2018) will cover the period 2018-2036. As far as any outstanding need for the period 2012-2017 is concerned this new assessment assumes that supply and demand for the period 2012-2017 net to zero, and the new assessment then starts with a new baseline and identifies all current and future need as of January 2018. As such there is no unmet need to be provided for the preceding period under the new planning definition.

- 1.5 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size¹. A site is a collection of pitches occupied by Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 1.6 **ADC Pitch Needs – Gypsies and Travellers that meet the Planning Definition:** In summary there is a need for 9 additional pitches in Arun over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 3 additional pitches for unknown Gypsy and Traveller households that may meet the planning definition; and a need for 13 additional pitches for Gypsy and Traveller households who did not meet the planning definition.
- 1.7 It is not a requirement for a GTAA to include an assessment of need for households that do not meet the planning definition (this will already be a component of the Objectively Assessed Need for the adopted Arun Local Plan). However, the report includes this assessment for illustrative purposes to guide the Council on levels of need that will have to be considered as part of the wider housing needs of the area (including to 2036) through Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016). Overall, there is need for 13 additional pitches for households that do not meet the planning definition.
- 1.8 **ADC Plot Needs- Travelling Showpeople:** In summary there is a need for 14 additional plots in Arun over the GTAA period to 2036 for Travelling Showpeople households that meet the planning definition; a need for up to 1 additional plot for unknown Travelling Showpeople households that may meet the planning definition; and a need for no additional plots for Travelling Showpeople households who did not meet the planning definition.
- 1.9 The other coastal West Sussex authorities assessed in the study are Adur District Council, Chichester District Council, Worthing Borough, along with parts of these local authorities located in the South Downs National Park.
- 1.10 The key outputs for need for all the authorities are as follows:

¹ Whilst it has now been withdrawn, Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.

Additional Pitch Needs – Gypsies and Travellers

Figure 1 – Additional need for Gypsy and Traveller households in Adur 2018-2036

| Status | Total |
|---------------------------------|-------------|
| Meet Planning Definition | 6 |
| Unknown | 0-2 (25%=0) |
| Do not meet Planning Definition | 17 |

Figure 2 – Additional need for Gypsy and Traveller households in Arun 2018- 2036

| Status | Total |
|---------------------------------|-------------|
| Meet Planning Definition | 9 |
| Unknown | 0-3 (25%=1) |
| Do not meet Planning Definition | 13 |

Figure 3 – Additional need for Gypsy and Traveller households in Chichester 2018-2036

| Status | Total |
|---------------------------------|--------------|
| Meet Planning Definition | 94 |
| Unknown | 0-28 (25%=7) |
| Do not meet Planning Definition | 23 |

Figure 4 – Additional need for Gypsy and Traveller households in SDNP (part) 2018-2036

| Status | Total |
|---------------------------------|-----------|
| Meet Planning Definition | 16 |
| Unknown | 2 (25%=0) |
| Do not meet Planning Definition | 2 |

Figure 5 – Additional need for Gypsy and Traveller households in Worthing 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

1.11 Additional Plot Needs - Travelling Showpeople

Figure 3 – Additional need for Travelling Showpeople households in Adur 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Figure 4 – Additional need for Travelling Showpeople households in Arun 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 14 |
| Unknown | 1 |
| Do not meet Planning Definition | 0 |

Figure 5 – Additional need for Travelling Showpeople households in Chichester 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 29 |
| Unknown | 5 |
| Do not meet Planning Definition | 0 |

Figure 6 – Additional need for Travelling Showpeople households in SDNP (part) 2018-36

| Status | Total |
|--------|-------|
| | |

| | |
|------------------------------------|---|
| Meet Planning Definition (in Arun) | 1 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Figure 7 – Additional need for Travelling Showpeople households in Worthing 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

1.12 **Transit recommendations:** As there is currently a public transit site in Chichester it is recommended that this is used in the first instance to deal with any unauthorised encampments, and that no additional transit provision is required at this time.

GYPSY AND TRAVELLER AND TRAVELLING SHOWPEOPLE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)

1.13 There is a commitment in the Local Plan to prepare a DPD which identifies and allocates land for permanent pitches to meet the need identified. The period beyond 2031 to 2036 would be an appropriate period to allow for an effective 15 year provision and the plan making lead time.

1.14 Consultants appointed for preparing the site assessment evidence will adopt a methodology which reflects current best practice and which is also consistent with the methodology set out in **Background paper 2** (SELVP30) for assessing permanent sites for Gypsy and Traveller and Travelling Showpeople June 2016. Consultants have also been appointed for the Gypsy & Traveller Sustainability Appraisal and together this evidence processes will form a sound basis for progressing a G&T Site Allocations DPD.

NEXT STEPS AND TIMETABLE

1.15 The current timetable for this DPD is anticipated as follows:

- Call for sites – May 2018
- Further call for sites ended on 31 October 2018
- GTAA evidence – Summer 2018
- Sites identification – Winter 2018
- Reg. 18 (part 1)– Summer 2019
- Reg.18 (Part 2) _ Winter 2019
- Reg 19 Consultation – Spring 2020
- Reg.22 Submission – Summer 2020
- Reg. 24 Examination – Autumn/winter 2020
- Reg. 25 Inspector's Report – Winter 2020/Spring 2021
- Reg. 26 Adoption Full Council – Spring 2021

1.16 Officers will bring this item back to Planning Policy Sub Committee at appropriate stages throughout the preparation of the DPD.

2. PROPOSAL(S):
That the report be noted and the consequent evidence used in order to prepare a Gypsy & Traveller Development Plan Document.

3. OPTIONS:
Not to progress and update the evidence base on the Gypsy & Traveller accommodation needs assessment using the Government's planning definition (published in Planning Policy for Traveller Sites 2015) would risk preparing an unsound Development Plan Document and lead to planning via appeal and unplanned development.

4. CONSULTATION:

| Has consultation been undertaken with: | YES | NO |
|--|-----|----|
| Relevant Town/Parish Council | | X |
| Relevant District Ward Councillors | | X |
| Other groups/persons (please specify) | | |

5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)

| | YES | NO |
|---|-----|----|
| Financial | | X |
| Legal | | X |
| Human Rights/Equality Impact Assessment | | X |
| Community Safety including Section 17 of Crime & Disorder Act | | X |
| Sustainability | | X |
| Asset Management/Property/Land | | X |
| Technology | | X |
| Other (please explain) | | X |

6. IMPLICATIONS:

The modest impact on the plan making timetable and need to revise the LDS.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to secure that development is plan led and consistent with sustainable development, while minimising the cost, including environmentally, arising from planning appeals.

9. BACKGROUND PAPERS:

- **Background paper 1** (Coastal West Sussex Authorities Gypsy and Traveller Accommodation Assessment (GTAA) Final Report October 2018)
- **Background paper 2** (SELVP30 Proposed methodology for assessing permanent sites for Gypsy and Traveller and Travelling Showpeople June 2016)



Coastal West Sussex

Gypsy and Traveller Accommodation Assessment (GTAA)

Final Report by Local Authority

October 2018



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1. Executive Summary

Introduction and Methodology

- 1.1 The primary objective of this Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for the Coastal West Sussex Authorities of Adur District Council, Arun District Council, Chichester District Council and Worthing Borough Council, along with the parts of these local authorities located in the South Downs National Park (the Councils).
- 1.2 A GTAA was completed by ORS in 2013 and an Update was published in 2014 which revised the pitch requirements for Gypsies and Travellers (not Travelling Showpeople). As well as updating the previous GTAAs, the principal reason for completing the 2018 study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This included a change to the definition of Travellers for planning purposes. The key change that was made was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will not now fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA (see Paragraph 2.8 for full definition).
- 1.3 The GTAA provides a credible evidence base which can be used to aid the preparation and implementation of Local Plan Policies and the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots for the 15-year period up to 2033, as required by the PPTS, with additional forecasts to 2034, 2035 and 2036 to meet Local Plan Periods. The outcomes of this study supersede the need figures of any previous Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments completed in the study area.
- 1.4 The GTAA has sought to understand the accommodation needs of the Gypsy, Traveller and Travelling Showpeople population in the study area through a combination of desk-based research, stakeholder interviews and engagement with members of the Travelling Community living on all identified sites and yards. A total of 120 interviews were completed with Gypsies and Travellers and 38 interviews were completed with Travelling Showpeople living on authorised and unauthorised sites and yards. Following extensive efforts to identify households living in bricks and mortar by contacting households on the waiting list for public sites, a total of 20 interviews were completed. In addition, stakeholder engagement was undertaken and total of 14 telephone interviews were completed. Two stakeholder workshops were also held to discuss the methodology prior to the fieldwork commencing, and to discuss the emerging outcomes from the study.
- 1.5 The fieldwork for the study was completed between December 2017 and March 2018. The baseline date for the study is **January 2018** which was when the majority of the site interviews were completed.
- 1.6 A Glossary of Terms can be found in **Appendix A**.

Key Findings

Additional Pitch Needs – Gypsies and Travellers

- 1.7 Overall, the additional pitch needs for Gypsies and Travellers from 2018-2036 are set out below. Additional needs are set out for those households that met the planning definition of a Gypsy or Traveller; for those unknown households where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite 3 visits to each site) who may meet the planning definition; and for those households that did not meet the planning definition (even though this is no longer a requirement for a GTAA).
- 1.8 Only the need from those households who met the planning definition and from those of the unknown households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- 1.9 The need arising from households that met the planning definition should be addressed through site allocation/intensification/expansion Local Plan Policies. Consideration will also need to be given to the allocation of pitches on public sites.
- 1.10 The Councils will need to carefully consider how to address the needs associated with unknown Travellers as it is unlikely that all of this need will have to be addressed through the provision of conditioned Gypsy or Traveller pitches. In terms of Local Plan Policies, the Councils should consider the use of a criteria-based policy (as suggested in PPTS) for any unknown households, as opposed to making a specific allocation in Local Plan Policies.
- 1.11 In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).
- 1.12 This approach is specifically referenced in the revised National Planning Policy Framework (July 2018). Paragraph 60 of the NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. Paragraph 61 then states that *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'*. The footnote to this section states that *'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'*
- 1.13 It is recognised that some of the Council's already have in place an NPPF compliant adopted Local Plan that sets out overall housing need. When these plans are reviewed, or new plans prepared, the findings of this report should be considered as part of future housing mix and type within the context of the assessment of overall housing need.

Adur District Council

- 1.14 There were 4 Gypsy or Traveller households identified in Adur that met the planning definition, 3 unknown households that may meet the planning definition, and 9 households that did not meet the planning definition.
- 1.15 The GTAA identifies a need for **6 additional pitches** for households that met the planning definition, and this is all from new household formation derived from the household demographics¹.
- 1.16 The GTAA identifies a need for up to 2 additional pitches for unknown households and this is made up of new household formation from a maximum of 3 households derived from the household demographics². If the ORS national average³ of 25% were applied this could result in a need for no additional pitches. Whilst the proportion of households in Adur that met the planning definition is higher (31%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need for 1 additional pitch from unknown households.
- 1.17 Whilst no longer a requirement to include in a GTAA, there is a need for 17 additional pitches for households that did not meet the planning definition. This is made up 2 teenage children who will be in need of a pitch of their own in the next 5 years, 1 movement from bricks and mortar, 7 from households on waiting lists for public sites (including 2 teenage children who will be in need of a pitch or their own and 1 from in-migration), and 7 from new household formation using a rate of 2.40% derived from the household demographics.

Figure 1 – Additional need for Gypsy and Traveller households in Adur 2018-2036

| Status | Total |
|---------------------------------|-------------|
| Meet Planning Definition | 6 |
| Unknown | 0-2 (25%=0) |
| Do not meet Planning Definition | 17 |

Arun District Council

- 1.18 There were 10 Gypsy or Traveller households identified in Arun that met the planning definition, 7 unknown households that may meet the planning definition, and 10 households that did not meet the planning definition.
- 1.19 The GTAA identifies a need for **9 additional pitches** for households that met the planning definition and this is made up of 2 unauthorised pitches, 1 concealed or doubled-up household or adult, 2 teenage children who will be in need of a pitch of their own in the next 5 years, 1 from a household on the waiting list for public sites, and 5 from new household formation using a formation rate of 1.75% derived from the household demographics, less supply of 2 pitches from households on a public site seeking to move from the site.
- 1.20 The GTAA identifies a need of up to 3 additional pitches for unknown households and this is made up of 1 teenage child in need of a pitch of their own in the next 5 years, and up to 2 pitches from new household

¹ Further information of how new household formation rates have been calculated can be found in Chapter 5. This explains the reasons why different rates of formation have been used.

² Whilst it was not possible to determine the planning status of these households it was possible to obtain details of household demographics.

³ Based on the outcomes of over 3,500 interviews completed by ORS in England since 2015.

formation (this uses a base of the 7 households and a net growth rate of 1.50%). If the ORS national average of 25% were applied this could result in a need for 1 additional pitch. Whilst the proportion of households in Arun that met the planning definition is higher (50%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need of up to 2 additional pitches from unknown households.

- 1.21 Whilst no longer a requirement to include them in a GTAA, there is a need for 13 additional pitches for households that did not meet the planning definition. This is made up of 1 concealed or doubled-up household or adult, 1 teenage child who will be in need of a pitch of their own in the next 5 years, 3 movement from bricks and mortar, 2 from households on waiting lists for public sites, and 6 from new household formation using a formation rate of 2.50% derived from the household demographics.

Figure 2 – Additional need for Gypsy and Traveller households in Arun 2018- 2036

| Status | Total |
|---------------------------------|-------------|
| Meet Planning Definition | 9 |
| Unknown | 0-3 (25%=1) |
| Do not meet Planning Definition | 13 |

Chichester District Council

- 1.22 There were 57 Gypsy or Traveller households identified in Chichester that met the planning definition, 72 unknown households that may meet the planning definition, and 32 households that did not meet the planning definition.
- 1.23 The GTAA identifies a need for **94 additional pitches** for households that met the planning definition, and this is made up of 10 pitches that are unauthorised, 23 concealed or doubled-up households or adults, 2 from households on waiting lists for public sites, 17 teenage children in need of a pitch of their own in the next 5 years, 6 from pitches with temporary planning permission, and 37 from new household formation using a rate of 1.80% derived from the site demographics. There is also supply of one pitch from a household seeking to move from a public site.
- 1.24 The GTAA identifies a need of up to 28 additional pitches for unknown households and this is made up of 3 unauthorised pitches, 2 concealed or doubled-up households or adults⁴, and new household formation of up to 23 from a maximum of 74 households⁵. If the ORS national average of 25% were applied this could result in a need for 7 additional pitches. Whilst the proportion of households in Chichester that met the planning definition is higher (64%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need of up to 18 additional pitches from unknown households.
- 1.25 Whilst no longer a requirement to include them in a GTAA, there is a need for 23 additional pitches for households that did not meet the planning definition. This is made up of 2 unauthorised pitches, 6 concealed or doubled-up households or adults, 3 from households on waiting lists for public sites, 2 teenage children who will be in need of a pitch of their own in the next 5 years, and 10 from new household formation using a formation rate of 1.25% derived from the household demographics.

⁴ Whilst it was not possible to determine the planning status of 1 household it was possible to obtain details of household demographics.

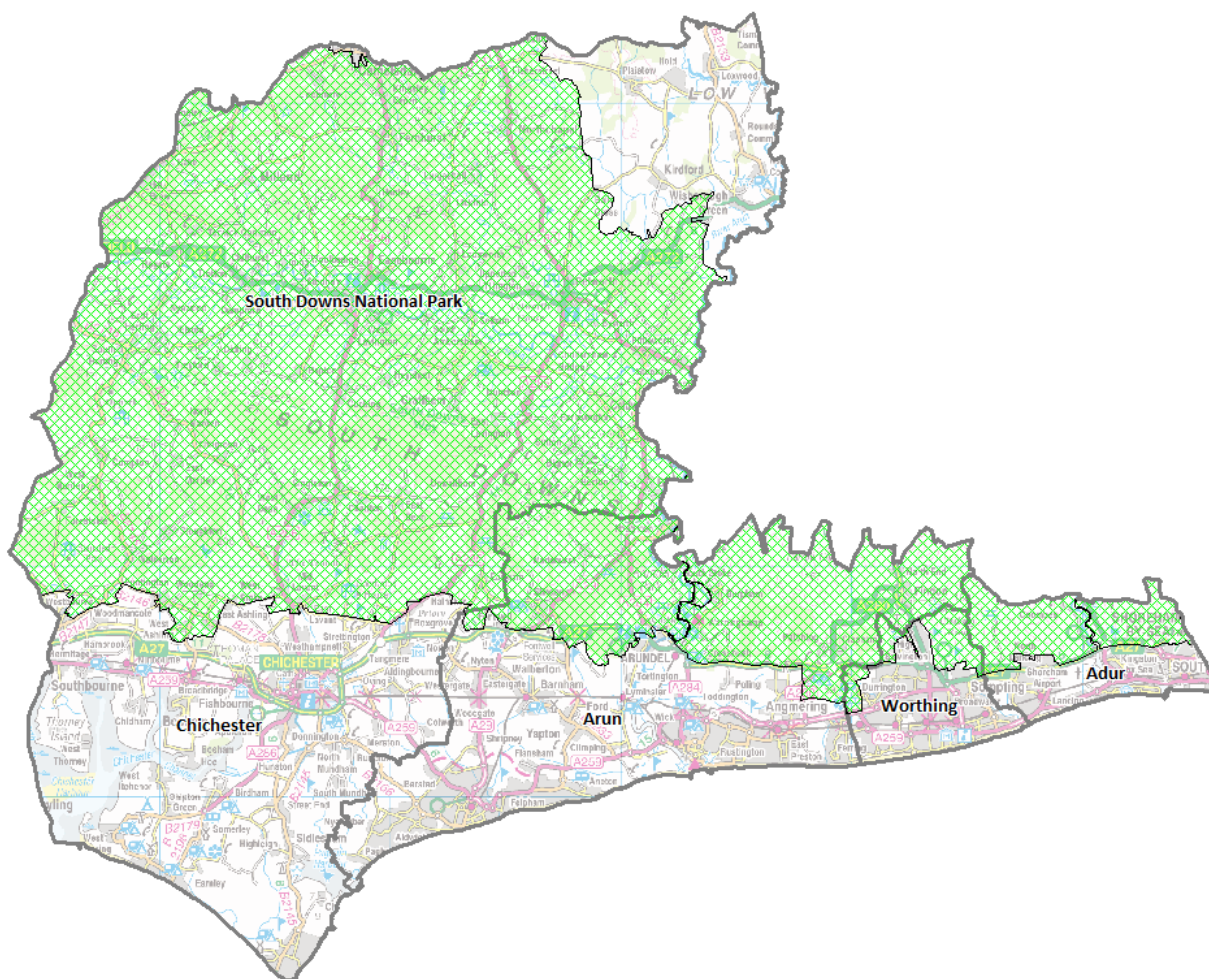
⁵ Including the 2 concealed households.

Figure 3 – Additional need for Gypsy and Traveller households in Chichester 2018-2036

| Status | Total |
|---------------------------------|--------------|
| Meet Planning Definition | 94 |
| Unknown | 0-28 (25%=7) |
| Do not meet Planning Definition | 23 |

South Downs National Park (SDNP)

- 1.26 The assessment of need has also covered the parts of the South Downs National Park that are located within Adur, Arun, Chichester and Worthing (see map below). Other GTAA studies have assessed levels of need for other parts of the SDNP.



- 1.27 There were 10 Gypsy or Traveller households identified in these parts of the SDNP that met the planning definition, 8 unknown households that may meet the planning definition, and 1 household that did not meet the planning definition.
- 1.28 The GTAA identifies a need for **16 additional pitches** for households that met the planning definition, and this is made up of 4 concealed or doubled-up households or adults, 9 teenage children or households in need of a pitch of their own in the next 5 years, and 3 from new household formation derived from the site demographics.
- 1.29 The GTAA identifies a need of up to 2 additional pitches for unknown households and this is made up of new household formation of up to 2 from a maximum of 8 households. If the ORS national average of

25% were applied this could result in a need for no additional pitches. Whilst the proportion of households in these parts of the SDNP that met the planning definition is higher (90%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need of up to 2 additional pitches from unknown households.

- 1.30 Whilst no longer a requirement to include them in a GTAA, there is a need for 2 additional pitches for households that did not meet the planning definition. This is made up of 2 teenage children who will be in need of a pitch of their own in the next 5 years.
- 1.31 A breakdown of this need for each local authority can be found in Chapter 10 and **Appendix B** and **Appendix C**.

Figure 4 – Additional need for Gypsy and Traveller households in SDNP (part) 2018-2036

| Status | Total |
|---------------------------------|-----------|
| Meet Planning Definition | 16 |
| Unknown | 2 (25%=0) |
| Do not meet Planning Definition | 2 |

Worthing Borough Council

- 1.32 There was 1 Gypsy and Traveller site identified in Worthing. It is located within the South Downs National Park area of the Borough and has been included within their assessment of need.
- 1.33 Despite all the efforts that were made during the course of the GTAA, no other Gypsy or Traveller sites were identified in Worthing, and no households were identified to interview living in bricks and mortar, despite a small number of households being identified in the 2011 Census. These efforts included discussions with Council Officers and other local stakeholders including the Traveller Education Service and Friends, Families and Travellers; attempts to contact all the households on the waiting list for a public site in West Sussex; and discussions with Travellers living on other sites in West Sussex asking if they had any relatives or friends who may be in need of a pitch on a site.
- 1.34 As such there is no current or future need for additional pitches in Worthing over the GTAA period to 2036, other than from sites within SDNP. This is consistent with the previous GTAA study which also found a need for no additional pitches in Worthing.

Figure 5 – Additional need for Gypsy and Traveller households in Worthing 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Additional Plot Needs - Travelling Showpeople

- 1.35 Overall the additional plot needs for Travelling Showpeople from 2018 to 2036 are set out below. Additional needs are set out for those households that met the planning definition of a Travelling Showperson; for those unknown households where an interview was not able to be completed (either due to households refusing to be interviewed, or not being present despite 3 visits to each site) who may meet the planning definition; and for those households that did not meet the planning definition (although this is no longer a requirement for a GTAA).

- 1.36 Only the need from those households who met the planning definition and from those of the unknown households who may subsequently demonstrate that they meet it should be considered as need arising from the GTAA.
- 1.37 The need arising from households that met the planning definition should be addressed through yard allocation/intensification/expansion Local Plan Policies.
- 1.38 The Councils will need to carefully consider how to address the needs associated with unknown Travelling Showpeople as it is unlikely that all of this need will have to be addressed through the provision of conditioned Travelling Showpeople plots. In terms of Local Plan Policies, the Councils should consider the use of a criteria-based policy (as suggested in PPTS) for any unknown households that do provide evidence that they meet the planning definition.
- 1.39 In general terms, the need for those households who did not meet the planning definition will need to be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN). See Paragraphs 1.12-1.13 for further details.

Adur District Council

- 1.40 There were no Travelling Showpeople identified in Adur so there is no current or future need for additional plots for the GTAA period 2018-36.

Figure 6 – Additional need for Travelling Showpeople households in Adur 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Arun District Council

- 1.41 There are 5 Travelling Showperson yards in Arun. It was possible to complete an interview with 12 households and 11 of these households met the planning definition, 1 household did not meet the planning definition and 4 households remain unknown.
- 1.42 The GTAA identifies a need for **14 additional plots** for households that met the planning definition, and this is made up of 5 concealed or doubled-up households or adults, 6 from teenagers who will be in need of a plot of their own in the next 5 years, and 3 from new household formation derived from the household demographics.
- 1.43 The GTAA identifies a need of up to 1 additional plot for unknown households and this is made up of new household formation of 1 from a maximum of 4 households.
- 1.44 Whilst no longer a requirement to include them in a GTAA, there was no current or future need for additional plots identified for the 1 household that did not meet the planning definition.

Figure 7 – Additional need for Travelling Showpeople households in Arun 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 14 |
| Unknown | 1 |
| Do not meet Planning Definition | 0 |

Chichester District Council

- 1.45 There are 28 Travelling Showperson yards in Chichester, 1 of which is unauthorised and 1 that is awaiting the determination of a planning application. It was possible to complete an interview with 25 households and they all met the planning definition. There were also 20 unknown households who were away at the time of the fieldwork.
- 1.46 The GTAA identifies a need for **29 additional plots** for households that met the planning definition, and this is made up of 7 concealed or doubled-up households or adults, 7 from teenagers who will be in need of a plot of their own in the next 5 years, 1 from in-migration, and 14 from new household formation using a rate of 1.65% derived from the household demographics.
- 1.47 The GTAA identifies a need of up to 5 additional plots for unknown households and this is made up of 1 unauthorised plot and new household formation of 4 from a maximum of 20 households.
- 1.48 Whilst no longer a requirement to include them in a GTAA, there was no current or future need for additional plots identified for the 1 household that did not meet the planning definition.

Figure 8 – Additional need for Travelling Showpeople households in Chichester 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 29 |
| Unknown | 5 |
| Do not meet Planning Definition | 0 |

South Downs National Park (SDNP)

- 1.49 The assessment of need has also covered the parts of the South Downs National Park that are located within Adur, Arun, Chichester and Worthing. Other GTAA studies have assessed levels of need for other parts of the SDNP.
- 1.50 There is 1 private Travelling Showperson yard in this part of the SDNP and it is located in Arun. The residents met the planning definition of a Traveller.
- 1.51 The GTAA identifies a need for **1 additional plot** for the household that met the planning definition, and this is made up of new household formation derived from the household demographics.
- 1.52 The GTAA identifies a need for no additional plots for unknown households and for households that did not meet the planning definition as none were identified in these parts of the SDNP.

Figure 9 – Additional need for Travelling Showpeople households in SDNP (part) 2018-2036

| Status | Total |
|------------------------------------|-------|
| Meet Planning Definition (in Arun) | 1 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Worthing Borough Council

- 1.53 There were no Travelling Showpeople identified in Worthing so there is no current or future need for additional plots for the GTAA period 2018-36.

Figure 10 – Additional need for Travelling Showpeople households in Worthing 2018-2036

| Status | Total |
|---------------------------------|-------|
| Meet Planning Definition | 0 |
| Unknown | 0 |
| Do not meet Planning Definition | 0 |

Transit Recommendations

- 1.54 As there is currently a public transit site in Chichester it is recommended that this is used in the first instance to deal with any unauthorised encampments, and that no additional transit provision is required at this time.
- 1.55 Due to potential changes to travelling behaviour as a result of changes to the PPTS in 2015, the use of historic evidence to assess current and future transit need is not recommended. Any recommendations for any new transit provision will need to make use of a robust post-PPTS (2015) evidence base. It is therefore recommended that the situation relating to levels of unauthorised encampments throughout the area should be monitored whilst any potential changes associated with PPTS (2015) develop.
- 1.56 This monitoring information should be collected as part of a Welfare Assessment (or equivalent) that is completed with households on unauthorised encampments. The way in which Welfare Assessments are carried out varies between local authorities, however, to provide robust input into the assessment of need for any further transit provision, it is recommended that the local authorities should consider collecting the following information:
- » Numbers of households, caravans and other vehicles.
 - » Reasons why households are in the local area.
 - » How long households are planning to stay in the local area.
 - » Whether households have a permanent place of resident elsewhere.
 - » Where households have come from and where they are planning to move on to next.
 - » Whether households would consider staying on a transit site if one were available.
 - » Whether households have permanent accommodation need in the local area.
- 1.57 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken once there is a sufficient local evidence base following the changes to PPTS in 2015. This will establish whether there is a need for investment in any further formal transit sites or emergency stopping places, or whether a managed approach is preferable alongside the public transit pitches in Chichester. It is recommended that a post-GTAA period of 3 years should be considered.
- 1.58 In the short-term, as well as the existing transit site, the Councils could consider the use of management arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward a further infrastructure-based approach.
- 1.59 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites, but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides.

- 1.60 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewage disposal point and refuse disposal facilities.

2. Introduction

The Study

- 2.1 The primary objective of this Gypsy and Traveller Accommodation Assessment (GTAA) is to provide a robust assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the following local authority areas: Adur District Council, Arun District Council, Chichester District Council and Worthing Borough Council, along with the parts of these areas located in the South Downs National Park (SDNP). The outcomes of this study supersede the outcomes of any previous Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments completed in the study area.
- 2.2 A GTAA was completed by ORS in 2013 and an Update was published in 2014 which revised the pitch requirements for Gypsies and Travellers (not Travelling Showpeople). As well as updating the previous GTAAs, the principal reason for completing the 2018 study was the publication of a revised version of Planning Policy for Traveller Sites (PPTS) in August 2015. This introduced a new planning definition for Travellers.
- 2.3 The study provides an evidence base to enable the Councils to comply with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014 (and as amended), PPTS (2015), the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018.
- 2.4 The GTAA is a robust and credible evidence base which can be used to aid the preparation and implementation of Local Plan Policies and the provision of Traveller pitches and plots covering the period 2018 to 2036, as well as breaks in accordance with the Councils' individual Local Plan periods. As well as identifying current and future permanent accommodation needs, it also seeks to assess any need for the provision of new transit sites or emergency stopping places.
- 2.5 We would note at the outset that the study covers the needs of Gypsies (including English, Scottish, Welsh and Romany Gypsies), Irish Travellers, New (Age) Travellers, and Travelling Showpeople, but for ease of reference we have referred to the study as a Gypsy and Traveller Accommodation Assessment (GTAA).
- 2.6 The baseline date for the study is **January 2018** which was when the majority of the household interviews were completed.

Definitions

- 2.7 The current planning definition for a Gypsy, Traveller or Travelling Showperson is set out in PPTS (2015). The previous housing definition set out in the Housing Act (2004) was repealed by the Housing and Planning Act (2016).

The Planning Definition in PPTS (2015)

- 2.8 For the purposes of the planning system, the definition was changed in PPTS (2015). The planning definition is set out in Annex 1 and states that:

For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) Whether they previously led a nomadic habit of life.*
- b) The reasons for ceasing their nomadic habit of life.*
- c) Whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

For the purposes of this planning policy, "travelling showpeople" means:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

(Planning Policy for Traveller Sites, Department for Communities and Local Government (DCLG), August 2015)

- 2.9 The key change that was made to both definitions was the removal of the term *persons...who have ceased to travel permanently*, meaning that those who have ceased to travel permanently will no longer fall under the planning definition of a Traveller for the purposes of assessing accommodation need in a GTAA.

Definition of Travelling

- 2.10 One of the most important questions that GTAAs will need to address in terms of applying the planning definition is *what constitutes travelling?* This has been determined through case law that has tested the meaning of the term '*nomadic*'.
- 2.11 **R v South Hams District Council (1994)** – defined Gypsies as "*persons who wander or travel for the purpose of making or seeking their livelihood (not persons who travel from place to place without any connection between their movements and their means of livelihood.)*" This includes 'born' Gypsies and Travellers as well as 'elective' Travellers such as New Age Travellers.
- 2.12 In **Maidstone BC v Secretary of State for the Environment and Dunn (2006)**, it was held that a Romany Gypsy who bred horses and travelled to horse fairs at Appleby, Stow-in-the-Wold and the New Forest, where he bought and sold horses, and who remained away from his permanent site for up to two months of the year, at least partly in connection with this traditional Gypsy activity, was entitled to be accorded Gypsy status.
- 2.13 In **Greenwich LBC v Powell (1989)**, Lord Bridge of Harwich stated that a person could be a statutory Gypsy if he led a nomadic way of life *only seasonally*.
- 2.14 The definition was widened further by the decision in **R v Shropshire CC ex p Bungay (1990)**. The case concerned a Gypsy family that had not travelled for some 15 years in order to care for its elderly and infirm parents. An aggrieved resident living in the area of the family's recently approved Gypsy site sought judicial review of the local authority's decision to accept that the family had retained their Gypsy status even though they had not travelled for some considerable time. Dismissing the claim, the judge held that

a person could remain a Gypsy even if he or she did not travel, provided that their nomadism was held in abeyance and not abandoned.

- 2.15 That point was revisited in the case of **Hearne v National Assembly for Wales (1999)**, where a traditional Gypsy was held not to be a Gypsy for the purposes of planning law as he had stated that he intended to abandon his nomadic habit of life, lived in a permanent dwelling and was taking a course that led to permanent employment.
- 2.16 **Wrexham County Borough Council v National Assembly of Wales and Others (2003)** determined that households and individuals could continue to lead a nomadic way of life with a permanent base from which they set out from and return to.
- 2.17 The implication of these rulings in terms of applying the planning definition is that it will only include those who travel (or have ceased to travel temporarily) for work purposes, or for seeking work, and in doing so stay away from their usual place of residence. It can include those who have a permanent site or place of residence, but that it will not include those who travel for purposes other than work, or for seeking work – such as holidays and visiting friends or relatives. It will not cover those who commute to work daily from a permanent place of residence (see APP/E2205/C/15/3137477).
- 2.18 It will also be the case that a household where some family members travel for nomadic purposes on a regular basis, but where other family members stay at home to look after children in education, or other dependents with health problems etc. the household unit would be defined as travelling under the planning definition.
- 2.19 Households will also fall under the planning definition if they can provide information that they have ceased to travel temporarily as a result of their own or their families' or dependants' educational or health needs or old age. In order to have ceased to travel temporarily these households will need to provide information that they have travelled for work in the past. In addition, households will have to provide information that they plan to travel again for work in the future.
- 2.20 This approach was endorsed by a Planning Inspector in a Decision Notice for an appeal in East Hertfordshire (Appeal Ref: APP/J1915/W/16/3145267) that was issued in December 2016. A summary can be seen below:

Case law, including the R v South Hams District Council ex parte Gibb (1994) judgment referred to me at the hearing, despite its reference to 'purposive activities including work' also refers to a connection between the travelling and the means of livelihood, that is, an economic purpose. In this regard, there is no economic purpose... This situation is no different from that of many landlords and property investors or indeed anyone travelling to work in a fixed, pre-arranged location. In this regard there is not an essential connection between wandering and work... Whilst there does appear to be some connection between the travel and the work in this regard, it seems to me that these periods of travel for economic purposes are very short, amounting to an extremely small proportion of his time and income. Furthermore, the work is not carried out in a nomadic manner because it seems likely that it is done by appointment... I conclude, therefore, that XX does not meet the definition of a gypsy and traveller in terms of planning policy because there is insufficient evidence that he is currently a person of a nomadic habit of life.

- 2.21 This was further reinforced in a more recent Decision Notice for an appeal in Norfolk that was issued in February 2018 (Ref: APP/V2635/W/17/3180533) that stated:

As discussed during the hearing, although the PPTS does not spell this [the planning definition] out, it has been established in case law (R v South Hams DC 1994) that the nomadism must have an economic purpose. In other words, gypsies and travellers wander or travel for the purposes of making or seeking their livelihood.

Legislation and Guidance for Gypsies and Travellers

^{2.22} Decision-making for policy concerning Gypsies, Travellers and Travelling Showpeople sits within a complex legislative and national policy framework and this study must be viewed in the context of this legislation and guidance. For example, the following key pieces of legislation and guidance are relevant when developing policies relating to Gypsies, Travellers and Travelling Showpeople:

- » PPG⁶ (2014) and as amended
- » PPTS (2015)
- » The Housing and Planning Act (2016)
- » NPPF (2018)

^{2.23} In addition, Case Law, Ministerial Statements, the outcomes of Local Plan Examinations and Planning Appeals, and Judicial Reviews need to be taken into consideration. Relevant examples have been included in this report.

^{2.24} The primary guidance for undertaking the assessment of housing need for Gypsies, Travellers and Travelling Showpeople is set out in the PPTS (2015). It should be read in conjunction with the National Planning Policy Framework (NPPF). In addition, the Housing and Planning Act makes provisions for the assessment of need for those Gypsy, Traveller and Travelling Showpeople households living on sites and yards who do not meet the planning definition – through the assessment of all households living in caravans.

PPTS (2015)

^{2.25} PPTS (2015) sets out the direction of Government policy. As well as including the planning definition of a Traveller, PPTS is closely linked to the NPPF. Among other objectives, the aims of the policy in respect of Traveller sites are (PPTS Paragraph 4):

- » *Local planning authorities should make their own assessment of need for the purposes of planning.*
- » *To ensure that local planning authorities, working collaboratively, develop fair and effective strategies to meet need through the identification of land for sites.*
- » *To encourage local planning authorities to plan for sites over a reasonable timescale.*
- » *That plan-making and decision-taking should protect Green Belt from inappropriate development.*
- » *To promote more private Traveller site provision while recognising that there will always be those Travellers who cannot provide their own sites.*
- » *That plan-making and decision-taking should aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.*

⁶ With particular reference to the sections on Housing and Economic Development Needs Assessments

- » *For local planning authorities to ensure that their Local Plan includes fair, realistic and inclusive policies.*
- » *To increase the number of Traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply.*
- » *To reduce tensions between settled and Traveller communities in plan-making and planning decisions.*
- » *To enable provision of suitable accommodation from which Travellers can access education, health, welfare and employment infrastructure.*
- » *For local planning authorities to have due regard to the protection of local amenity and local environment.*

2.26 In practice, the document states that (PPTS Paragraph 9):

- » *Local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople, which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning authorities.*

2.27 PPTS goes on to state (Paragraph 10) that in producing their Local Plan local planning authorities should:

- » *Identify and annually update a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets.*
- » *Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.*
- » *Consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on strategic planning issues that cross administrative boundaries).*
- » *Relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density.*
- » *Protect local amenity and environment.*

2.28 Local Authorities now have a duty to ensure a 5-year land supply to meet the identified needs for Traveller sites. However, 'Planning Policy for Traveller Sites' also notes in Paragraph 11 that:

- » *Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria-based policies should be fair and should facilitate the traditional and nomadic life of Travellers, while respecting the interests of the settled community.*

Revised National Planning Policy Framework (2018)

2.29 The revised National Planning Policy Framework was issued in July 2018. Paragraph 60 of the revised NPPF sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance.

2.30 Paragraph 61 then states that *'Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but*

not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes'. The footnote to this section states that 'Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.'

- ^{2.31} This essentially sets out that the needs of households that meet the planning definition should be addressed under the PPTS, and that the needs of households that are not found to meet the planning definition should be addressed as part of the wider housing needs of an area.

3. Methodology

Background

- 3.1 Over the past 10 years, ORS has continually refined a methodology for undertaking robust and defensible Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessments. This has been updated in light of the introduction of the PPG in 2014; changes to PPTS in August 2015; the Housing and Planning Act in 2016; and the revised NPPF in 2018. It has also responded to changes set out by Planning Ministers, with particular reference to new household formation rates. This is an evolving methodology that has been adaptive to changes in planning policy as well as the outcomes of Local Plan Examinations and Planning Appeals.
- 3.2 PPTS (2015) contains a number of requirements for local authorities which must be addressed in any methodology. This includes the need to pay particular attention to early and effective community engagement with both settled and traveller communities (including discussing travellers' accommodation needs with travellers themselves); identification of permanent and transit accommodation needs separately; working collaboratively with neighbouring local planning authorities; and establishing whether households fall within the planning definition for Gypsies, Travellers and Travelling Showpeople. The stages below provide a summary of the methodology that was used to complete this study. More information on each stage is provided in the appropriate sections of this report.
- 3.3 The approach currently used by ORS was considered in April 2016 and July 2017 by the Planning Inspector for the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy. She concluded in her final Examination Report that was published in October 2017:

The methodology behind this assessment incorporates a full demographic study of all occupied pitches, a comprehensive effort to undertake interviews with Gypsy and Traveller households, and consideration of the implications of the new national policy. I am satisfied that the GTAA provides a robust and credible evidence base and I accept its findings.

- 3.4 In addition, the Inspector for the East Herts District Plan also found the evidence base in relation to Gypsies and Travellers to be sound in her Inspection Report that was issued in July 2018. She concluded:

The need of the travelling community has been carefully and robustly assessed and locations to meet identified needs have been allocated for the plan period. Policy HOU9 sets out the need for 5 permanent pitches for Gypsies and Travellers... the approach to the provision of housing is comprehensive, positively prepared, appropriate to the needs of the area and consistent with national policy.

Desk-Based Review

3.5 ORS collated a range of secondary data that was used to support the study. This included:

- » Census data.
- » Site records.
- » Traveller Caravan Count data.
- » Records of unauthorised sites/encampments.
- » Information on planning applications/appeals.
- » Information on local enforcement actions.
- » Existing needs assessments and other relevant local studies.
- » Existing national and local policy.

Stakeholder Engagement

3.6 Engagement was undertaken with key Council Officers and with wider stakeholders through telephone interviews. A total of 5 interviews were completed with Council Officers from the commissioning planning authorities and details of the outcomes can be found in Chapters 7 to 11. Interviews were also completed with a representative from West Sussex County Council and with a member of the former Sussex Traveller Action Group (STAG). The outcomes of the interview with West Sussex County Council provided valuable input into the desk-based review of existing sites and the assessment of need for transit provision. Unfortunately, the former representative from STAG was unable to provide any further information to support the assessment, other than that the Councils should support planning applications for new sites where appropriate. A Topic Guide was agreed with the Councils prior to the interviews commencing.

3.7 In addition, 2 Stakeholder Workshops were held. The purpose of the first workshop was to engage with those involved in planning for Travellers in order to discuss the most appropriate approach to complete the assessment and to raise awareness of the study among members of the Travelling Community. The purpose of the second workshop was to discuss the emerging outcomes of the assessment and to see if any further work could be done to increase the number of interviews that had been completed. The workshops were attended by Officers from the commissioning local authorities and representatives from Friends, Families and Travellers including a resident from the public site in Adur.

Working Collaboratively with Neighbouring Planning Authorities

3.8 To help support the Duty-to-Cooperate and provide background information for the study, telephone interviews were conducted with Planning Officers in neighbouring planning authorities. These interviews will help to ensure that wider issues that may impact on this project are fully understood. This included interviews with Officers from the Councils set out below. Again, a detailed Topic Guide was agreed with the Councils.

- | | |
|----------------------|---------------|
| » Brighton and Hove. | » Horsham. |
| » Crawley. | » Mid Sussex. |
| » East Hampshire. | » Waverley. |
| » Havant. | |

Survey of Travelling Communities

- 3.9 Through the desk-based research and the stakeholder interviews, ORS sought to identify all authorised and unauthorised sites/yards and encampments in the study area and attempted to complete an interview with the residents on all occupied pitches and plots. In order to gather the robust information needed to assess households against the planning definition of a Traveller, up to 3 visits were made to households where it was not initially possible to conduct an interview because they were not available at the time.
- 3.10 Our experience suggests that an attempt to interview households on all pitches is more robust. A sample-based approach often leads to an under-estimate of need – and is an approach which is regularly challenged at Local Plan Examinations and at Planning Appeals.
- 3.11 ORS worked closely with the Councils to ensure that the interviews collected all the necessary information to support the study. The household interview questions that were used (**Appendix F**) have been updated to take account of recent changes to PPTS and to collect the information ORS feel is necessary to apply the planning definition. All sites and yards were visited by members of our team of experienced Researchers who work on our GTAA studies across England and Wales. Researchers attempted to conduct semi-structured interviews with residents to determine their current demographic characteristics; their current and future accommodation needs; whether there is any over-crowding or the presence of concealed or doubled-up households or adults; and travelling characteristics. Researchers sought to identify contacts living in bricks and mortar to interview, as well as an overall assessment of each site to determine any opportunities for intensification or expansion to meet current and future needs.
- 3.12 Researchers also sought information from residents on the type of pitches they may require in the future – for example private or socially rented, together with any features they may wish to be provided on a new pitch or site.
- 3.13 Where it was not possible to undertake an interview, Researchers sought to capture as much information as possible about each pitch from sources including neighbouring residents and site management (if present).
- 3.14 Researchers also distributed copies of an information leaflet that was prepared by Friends, Families and Travellers explaining the reasons for the need to complete the household interview as part of the GTAA process.

Figure 11 – Friends, Families and Traveller Leaflet

fft
Friends Families and Travellers

We are writing to you from Friends, Families and Travellers (FFT) a national charity working on behalf of Gypsies and Travellers
www.gypsy-traveller.org

MORE PITCHES PLEASE!

Councils are currently carrying out new Accommodation Needs Assessments. The assessments are being done to work out if there is a need for more Gypsy/Traveller sites in your area and it is really important that you take part in the process so that your Council identifies the true level of need for sites in your area.

Questions about travelling are particularly important.
In 2015 the Government changed the planning definition of what it means to be a 'Gypsy or Traveller' and it now reads as follows:
Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

This means that if you have completely stopped travelling, even if it is as a result of ill-health or old age or because you care for people who are too old or too ill to travel then you will be unlikely to meet the planning definition and any need you or your dependants have for a caravan site will no longer be included in the Council's assessment of its need for Gypsy/Traveller sites in your area.

Information
fft
Friends Families and Travellers

So, if you are still travelling for work, even if it is only for part the year or in order to buy and sell goods at any of the traditional horse fairs etc. then it is essential you make that clear to your Council when it assesses its need for sites in your area.

We have already seen some examples of questionnaires being used by consultants to assess needs and have some concerns about the way in which the questions have been worded and the limited space on forms to give answers.

For example, on a form produced by ORS questionnaire there is a section in the questionnaire about travelling (Section F) which could cause people to give misleading answers.

For example, one question asks 'How many trips you have made in the last 12 months'
If you answer '0' to this question then you will probably not be deemed a Gypsy or Traveller according to the new planning definition, so don't forget to include trips such as for work, looking for work, going to horse fairs etc.

Another question asks 'When did you stop travelling'
Please think carefully before answering such a question. Have you stopped travelling for good? If so then you could be judged not to be a Gypsy or Traveller in planning terms.

Finally, a question asks 'Do family members plan to travel in the future?'
Again, please bear in mind that if you answer 'No' you will be judged not to be a Gypsy or Traveller in planning terms, so think carefully about whether you are ever likely to be travelling again in the future.

Another question asks 'Have you or family members ever travelled?'
If you answer 'No' to this question then you will probably be judged not to be a Gypsy or Traveller in planning terms. So again don't forget to include trips looking for work, visiting horse fairs etc.

If you want to speak to us further please do not hesitate to call
FFT on 01273 234 777 or your local Gypsy/Traveller group.

Engagement with Bricks and Mortar Households

- 3.15 The 2011 Census recorded 38 households that identified as Gypsy or Irish Traveller who live in a house or flat in Adur, 52 in Arun, 55 in Chichester and 39 in Worthing. It is not possible to get a breakdown of how many of these live in the areas of the Councils covered by the SDNP.
- 3.16 ORS apply a rigorous approach to making contact with bricks and mortar households as this is a common issue raised at Local Plan Examinations and Planning Appeals. Contacts were sought through a range of sources including the interviews with people on existing sites and yards, intelligence from the stakeholder interviews, contacting people on the waiting list for public sites and other local knowledge from stakeholders and adverts on social media (including the Friends, Families and Travellers Facebook page). Whilst efforts were made to contact households on the wider Housing Register this was not possible as the ethnicity of applicants was not recorded.
- 3.17 The following additional approaches were taken to identify potential households to interview in the Coastal West Sussex local authorities:
 - » **Friends, Families and Travellers:** ORS contacted members of this group, but they were unable to identify any households that they were working with to be involved in the study.
 - » **West Sussex County Council Traveller Education Team⁷:** The Team agreed to distribute information about the study to families they work with who are currently living in bricks and mortar in the area.

⁷ The Traveller Education Service provides advice, guidance and focused support to schools and to parents and pupils from the Traveller community.

- » **Public sites waiting list:** Attempts were made to contact 67 people on the waiting list for public sites by telephone. Up to 3 attempts were made to contact each household and messages were left when calls went to voicemail asking households to contact ORS if they wanted to discuss their housing needs.
- 3.18 Through this overall approach the GTAA endeavoured to do everything possible to give households living in bricks and mortar the opportunity to make their views known and to be interviewed.
- 3.19 As a rule, ORS do not make any assumptions on the overall needs from household in bricks and mortar based on the outcomes of any interviews that are completed as, in our experience, this leads to a significant over-estimate of the number of households wishing to move to a site or a yard. ORS work on the assumption that all those wishing to move will make their views known to us based on the wide range of publicity that is put in place.

Figure 12 – Bricks and Mortar Adverts



Friends, Families and Travellers
29 January · 🌐

ORS would like to speak to anyone interested in developing a site or yard or who is living in bricks and mortar who would prefer to live on a site or yard in #Arun, #Adur, #Barnet, #Brent, #CheshireEast, #CheshireWest, #Chester, #Chichester, #Dacorum, #Ealing, #Gravesham, #Halton, #Harrow, #Hillingdon, #Hounslow, #KingstonUponThames #Medway, #MoleValley, #Runnymede, #Spelthorne, #StAlbans, #SurreyHeath, #Warrington, #Watford and #Worthing

This is part of a Gypsy and Traveller Accommodation Needs Assessments in these areas. Here are some details on what that means and advice on what questions you might be asked: <https://www.gypsy-traveller.org/.../answer-gypsy-traveller-a.../>



 **Opinion Research Services**
Excellent research for the public, voluntary and private sectors

Gypsy, Traveller & Travelling Showpeople Accommodation Assessments

Opinion Research Services (ORS) is an independent research company who carry out Gypsy, Traveller and Travelling Showpeople Accommodation Assessments across the country. These assessments must be carried out by every council to inform them how many new pitches and plots will need to be provided in the future.

ORS would like to speak to Gypsies, Travellers and Travelling Showpeople who are looking to develop a site or yard or who live in bricks and mortar and would prefer to live on a site or yard in any of the following areas:

Arun, Adur, Cheshire East, Cheshire West and Chester, Chichester, Dacorum, Gravesham, Halton, Hounslow, Kingston upon Thames Medway, Mole Valley, Runnymede, Spelthorne, St Albans, Surrey Heath, Runnymede, Warrington, Watford and Worthing

Your views are very important to us.

For additional advice from Friends, Families and Travellers on the Needs Assessment process please visit http://www.gypsy-traveller.org/wp-content/uploads/2016/06/GTAA-leaflet-A4_v5.pdf

If you would like to speak to ORS about your accommodation needs please contact **Claire Thomas** on **01792 535337**

Timing of the Fieldwork

3.20 ORS are fully aware of the transient nature of many travelling communities and subsequent seasonal variations in site and yard occupancy. As such most of the fieldwork was undertaken during the non-travelling season and avoided days of known local or national events. Fieldwork was completed between December 2017 and March 2018, with the majority completed during January 2018.

Applying the Planning Definition

3.21 The primary change to PPTS (2015) in relation to the assessment of need was the change to the definition of a Gypsy, Traveller or Travelling Showperson for planning purposes. Through the site interviews ORS sought to collect information necessary to assess each household against the planning definition. As the revised PPTS was only issued in 2015, only a small number of relevant appeal decisions have been issued by the Planning Inspectorate on how the planning definition should be applied (see Paragraphs 2.20 and 2.21 for examples) – these support the view that households need to be able to demonstrate that they travel for work purposes, or for seeking work, to meet the planning definition, and stay away from their usual place of residence when doing so, or have ceased to travel for work purposes temporarily due to education, ill health or old age.

3.22 The household survey included a structured section of questions to record information about the travelling characteristics of household members. This included questions on the following key issues:

- » Whether any household members have travelled in the past 12 months.
- » Whether household members have ever travelled.
- » The reasons for travelling - carefully probing reasons for travelling to determine whether for work or leisure/cultural purposes - visits to fairs for example.
- » Where household members travelled to.
- » The times of the year that household members travelled.
- » Where household members stay when they are away travelling.
- » When household members stopped travelling.
- » The reasons why household members stopped travelling.
- » Whether household members intend to travel again in the future.
- » When and the reasons why household members plan to travel again in the future.

3.23 When the household survey was completed the outcomes from these questions on travelling were used to determine the status of each household against the planning definition in PPTS (2015). Through a combination of responses households need to provide sufficient information to demonstrate that household members travel for work purposes, or for seeking work, and in doing so stay away from their usual place of residence, or that they have ceased to travel temporarily due to education, ill health or old age, and plan to travel again for work purposes in the future. The same definition applies to Travelling Showpeople as to Gypsies and Travellers.

3.24 Households that need to be considered in the GTAA fall under one of 3 classifications. Only those households that meet, or may meet, the planning definition will form the components of need to be formally included in the GTAA:

- » Households that travel under the planning definition.

- » Households that have ceased to travel temporarily under the planning definition.
- » Households where an interview was not possible who *may* fall under the planning definition.

3.25 Whilst the needs of those households that do not meet the planning definition do not need to be included in the GTAA, they have been assessed to provide the Councils with components of need as part of their work on wider housing needs assessments.

Unknown Households

3.26 As well as calculating need for households that meet the planning definition, the needs of the households where an interview was not completed (either due to refusal to be interviewed or households that were not present during the fieldwork period) need to be considered as part of the GTAA where they are believed to be Gypsies and Travellers who may meet the planning definition. Whilst there is no guidance that sets out how the needs of these households should be addressed; an approach has been taken that seeks an estimate of potential need from these households. This will be an additional need figure over and above the need identified for households that do meet the planning definition.

3.27 The estimate seeks to identify potential current and future need from any pitches known to be temporary or unauthorised, and through new household formation. For the latter the ORS national rate of 1.50%⁸ has been used as the demographics of residents are unknown.

3.28 Should further information be made available to the Councils that will allow for the planning definition to be applied, these households could either form a confirmed component of need to be addressed through the GTAA or through wider assessments of housing need.

3.29 ORS believe it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether households where an interview was not completed meet the planning definition based on the outcomes of households where an interview was completed.

3.30 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that overall approximately 25% of households who have been interviewed meet the planning definition (this rises to 70% for Travelling Showpeople based on over 300 interviews that have been completed) – and in some local authorities, no households meet the planning definition.

3.31 ORS are not implying that this is an official national statistic - rather a national statistic based on the outcomes of our fieldwork since the introduction of PPTS (2015). It is estimated that there are 14,000 Gypsy and Traveller pitches in England and ORS have spoken with households on 25% of them at a representative range of sites. Approximately 25% meet the planning definition. ORS also asked similar questions on travelling in over 2,000 pre-PPTS (2015) household interviews and found that 10% of households would have met the PPTS (2015) planning definition. It is ORS' view therefore that this is the most comprehensive national statistic in relation to households that meet the planning definition in PPTS (2015) and should be seen as a robust statistical figure.

3.32 This would suggest that it is likely that only a proportion of the potential need identified from unknown households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be addressed through separate Local Plan Policies. An assessment of need for unknown Travellers can be found in **Appendix B**.

⁸ See Chapter 5.

3.33 The ORS methodology to address the need arising from unknown households was supported by the Planning Inspector for a Local Plan Examination for Maldon Borough Council, Essex. In his Report that was published on 29th June 2017 he concluded:

150. The Council's stance is that any need arising from 'unknowns' should be a matter left to the planning application process. Modifications to Policy H6 have been put forward by the Council setting out criteria for such a purpose, which I consider further below. To my mind, that is an appropriate approach. While there remains a possibility that up to 10 further pitches may be needed, that cannot be said to represent identified need. It would be unreasonable to demand that the Plan provide for needs that have not been established to exist. That being said, **MM242h** is nonetheless necessary in this regard. It commits the Council to a review of the Plan if future reviews of the GTAA reveal the necessity for land allocations to provide for presently 'unknown' needs. For effectiveness, I have altered this modification from the version put forward by the Council by replacing the word "may" with "will" in relation to undertaking the review committed to. I have also replaced "the Plan" with "Policy H6" – the whole Plan need not be reviewed.

Households that do not meet the Planning Definition

3.34 Households who do not travel for work purposes now fall outside the planning definition of a Traveller. However Romany Gypsies and Irish and Scottish Travellers may be able to demonstrate a right to culturally appropriate accommodation under the Equality Act (2010). In addition, provisions set out in the Housing and Planning Act (2016) include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored. Draft Guidance⁹ related to this section of the Housing and Planning Act has been published setting out how the Government would want local housing authorities to undertake this assessment and it is the same as the GTAA assessment process. The implication is therefore that the housing needs of any Gypsy and Traveller households who do not meet the planning definition of a Traveller will need to be considered as part of the wider housing needs of the area and will form a subset of the wider need arising from households residing in caravans. This is echoed in the revised NPPF (July 2018).

3.35 Paragraph 61 of the revised NPPF states that '*Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes*'. The footnote to this section states that '*Planning Policy for Traveller Sites sets out how travellers' housing needs should be assessed for those covered by the definition in Annex 1 of that document.*'

3.36 An assessment of need for Travellers that did not meet the planning definition can be found in **Appendix C**.

⁹ "Draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats." (March 2016)

Calculating Current and Future Need

3.37 To identify need, PPTS (2015) requires an assessment for current and future pitch requirements but does not provide a methodology for this. However, as with any housing assessment, the underlying calculation can be broken down into a relatively small number of factors. In this case, the key issue is to compare the supply of pitches available for occupation with the current and future needs of the population.

Supply of Pitches

3.38 The first stage of the assessment sought to determine the number of vacant and potentially available supply in the study area:

- » Current vacant pitches.
- » Pitches currently with planning consent due to be developed within 5 years.
- » Pitches vacated by people moving to housing.
- » Pitches vacated by people moving from the study area (out-migration).

3.39 It is important when seeking to identify supply from vacant pitches that they are in fact available for general occupation – i.e. on a public or social rented site, or on a private site that is run on a commercial basis with anyone being able to rent a pitch if they are available. Typically, vacant pitches on small private family sites are not included as components of available supply but can be used to meet any current and future need from the family living on the site.

Current Need

3.40 The second stage was to identify components of current need. It is important to address issues of double counting:

- » Households on unauthorised developments for which planning permission is not expected.
- » Concealed, doubled-up or over-crowded households (including single adults).
- » Households in bricks and mortar wishing to move to sites.
- » Households in need on waiting lists for public sites.

Future Need

3.41 The final stage was to identify components of future need. This includes the following four components:

- » Teenage children in need of a pitch of their own in the next 5 years.
- » Households living on sites with temporary planning permissions.
- » New household formation.
- » In-migration.

3.42 Household formation rates are often the subject of challenge at appeals or examinations. ORS firmly believe that any household formation rates should use a robust local evidence base, rather than simply relying on national precedent. The approach taken is set out in more detail in Chapter 5 of this report.

3.43 All these components of supply and need are presented in easy to understand tables which identify the overall net need for current and future accommodation for both Gypsies and Travellers, and for Travelling Showpeople. This has proven to be a robust model for identifying needs. The residential and transit pitch

needs for Gypsies and Travellers are identified separately and the needs are identified for the period 2018 to 2036. These can be found in Chapters 7-11 and in Appendices B and C.

Pitch Turnover

3.44 Some assessments of need make use of pitch turnover as an ongoing component of supply. ORS do not agree with this approach or about making any assumptions about annual turnover rates. This is an approach that usually ends up with a significant under-estimate of need as in the majority of cases vacant pitches on sites are not available to meet any additional need. The use of pitch turnover has been the subject of several Inspectors Decisions, for example APP/J3720/A/13/2208767 found a GTAA to be unsound when using pitch turnover and concluded:

West Oxfordshire Council relies on a GTAA published in 2013. This identifies an immediate need for 6 additional pitches. However the GTAA methodology treats pitch turnover as a component of supply. This is only the case if there is net outward migration yet no such scenario is apparent in West Oxfordshire. Based on the evidence before me I consider the underlying criticism of the GTAA to be justified and that unmet need is likely to be higher than that in the findings in the GTAA.

3.45 In addition, a GTAA Best Practice Guide produced by a number of organisations including Friends, Families and Travellers, the London Gypsy and Traveller Unit, the York Travellers Trust, the Derbyshire Gypsy Liaison Group, Garden Court Chambers and Leeds GATE concluded that:

Assessments involving any form of pitch turnover in their supply relies upon making assumptions; a practice best avoided. Turnover is naturally very difficult to assess accurately and in practice does not contribute meaningfully to additional supply so should be very carefully assessed in line with local trends. Mainstream housing assessments are not based on the assumption that turnover within the existing stock can provide for general housing needs.

3.46 As such, other than current vacant pitches on sites that are known to be available, or pitches that are known to become available (as a result of households moving for example), pitch turnover has not been considered as a component of supply in this GTAA.

Transit Provision

3.47 PPTS (2015) also requires an assessment of the need for any transit sites or stopping places. While the majority of Gypsies and Travellers have permanent bases either on Gypsy and Traveller sites or in bricks and mortar and no longer travel, other members of the community either travel permanently or for part of the year. Due to the mobile nature of the population, a range of sites or management approaches can be developed to accommodate Gypsies and Travellers as they move through different areas. These include:

- » Transit sites.
- » Temporary/Emergency stopping places.
- » Temporary (seasonal) sites.
- » Negotiated Stopping Agreements.

3.48 In order to investigate the potential need for transit provision when undertaking work to support the study, ORS sought to review the West Sussex Transit Study (2013); to undertake analysis of any records

of unauthorised sites and encampments; and to review information from the MHCLG¹⁰ Traveller Caravan Count. The outcomes of the interviews with Council Officers, Officers from neighbouring local authorities and other stakeholders were also taken into consideration when determining this element of need in the study area. An assessment of need for transit provision can be found in Chapter 12.

¹⁰ Ministry of Housing, Communities and Local Government, Formerly DCLG.

4. Gypsy, Traveller and Travelling Showpeople Sites and Population

Introduction

- 4.1 One of the main considerations of this study is to provide evidence to support the provision of pitches and plots to meet the current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople. A pitch is an area normally occupied by one household, which typically contains enough space for one or two caravans but can vary in size¹¹. A site is a collection of pitches occupied by Gypsies and Travellers. For Travelling Showpeople, the most common descriptions used are a plot for the space occupied by one household and a yard for a collection of plots occupied by Travelling Showpeople. Throughout this study the main focus is upon how many extra pitches for Gypsies and Travellers and plots for Travelling Showpeople are required in the study area.
- 4.2 The public and private provision of mainstream housing is also largely mirrored when considering Gypsy and Traveller accommodation. One common form of a Gypsy and Traveller site is a publicly-provided residential site, which is provided by a Local Authority or by a Registered Provider (usually a Housing Association). Pitches on public sites can be obtained through signing up to a waiting list, and the costs of running the sites are met from the rent paid by the tenants (similar to social housing).
- 4.3 The alternative to public residential sites are private residential sites and yards for Gypsies, Travellers and Travelling Showpeople. These result from individuals or families buying areas of land and then obtaining planning permission to live on them. Households can also rent pitches on existing private sites. Therefore, these two forms of accommodation are the equivalent to private ownership and renting for those who live in bricks and mortar housing. Generally, the majority of Travelling Showpeople yards are privately owned and managed.
- 4.4 The Gypsy, Traveller and Travelling Showpeople population also has other forms of sites due to its mobile nature. Transit sites tend to contain many of the same facilities as a residential site, except that there is a maximum period of residence which can vary from a few days or weeks to a period of months. An alternative to a transit site is an emergency or negotiated stopping place. This type of site also has restrictions on the length of time someone can stay on it but has much more limited facilities. Both of these types of site are designed to accommodate, for a temporary period, Gypsies, Travellers and Travelling Showpeople whilst they travel. A number of local authorities also operate an accepted encampments policy where short-term stopovers are tolerated without enforcement action.
- 4.5 Further considerations for the Gypsy and Traveller population are unauthorised developments and encampments. Unauthorised developments occur on land which is owned by the Gypsies and Travellers or with the approval of the land owner, but for which they do not have planning permission to use for residential purposes. Unauthorised encampments typically occur on publicly owned land but can also occur on privately owned land.

¹¹ Whilst it has now been withdrawn, Government Guidance on Designing Gypsy and Traveller Sites recommended that, as a general guide, an average family pitch must be capable of accommodating an amenity building, a large trailer and touring caravan, parking space for two vehicles and a small garden area.

MHCLG Traveller Caravan Count

- 4.6 Another source of information available on the Gypsy, Traveller and Travelling Showpeople population is the bi-annual Traveller Caravan Count which is conducted by each Local Authority in England on a specific date in January and July of each year and reported to MHCLG. This is a statistical count of the number of caravans on both authorised and unauthorised sites across England. With effect from July 2013, the Gypsy and Traveller Caravan Count was renamed the Traveller Caravan Count due to the inclusion of information on Travelling Showpeople caravans.
- 4.7 As this count is of caravans and not households, it makes it more difficult to interpret for a study such as this because it does not count pitches or resident households. The count is merely a ‘snapshot in time’ conducted by the Local Authority on a specific day, and any unauthorised sites or encampments which occur on other dates will not be recorded. Likewise, any caravans that are away from sites on the day of the count will not be counted. As such, it is not considered appropriate to use the outcomes from the Traveller Caravan Count to support the calculation of current and future need as the information collected during the site visits is seen as more robust and fit-for-purpose. However, the Caravan Count data has been used to *support* the identification of the need to provide for transit provision and this is set out in Chapter 12 of this report.

5. Current and Future Provision

Background

- 5.1 This section focuses on the background to the additional pitch and plot provision which is needed by each of the local authorities in the study area currently and to 2036. A summary of the outcomes of the assessment of current and future provision can be found in the next sections of this report. This includes both current unmet need and need which is likely to arise in the future. The time period for the assessment allows for robust forecasts of the requirements for future provision, based upon the evidence contained within this study and also secondary data sources. Whilst the difficulty in making accurate assessments beyond 5 years has been highlighted in previous studies, the approach taken in this study to estimate new household formation has been accepted by Planning Inspectors as the most appropriate methodology to use.
- 5.2 We would note that the assessment of current and future provision is based upon a combination of the household interviews, planning records and stakeholder interviews. In many cases, the interview data is not used in isolation, but instead is used to validate information from planning records or other sources.
- 5.3 The assessment concentrates on the total additional current and future provision which is required in each area, along with an overall assessment of need for any transit provision for the study area as a whole.

New Household Formation Rates

- 5.4 Nationally, a net household formation and growth rate of 3.00% net per annum has been commonly assumed and widely used in local Gypsy and Traveller assessments¹², even though there is no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically. In this context, ORS has prepared a *Technical Note on Household Formation and Growth Rates (2015)*. The main conclusions are set out here and the full paper is in **Appendix G**.
- 5.5 Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in the Traveller Caravan Count. However, Caravan Count data is very unreliable and erratic – so the only proper way to project future population and household growth is through detailed demographic analysis.
- 5.6 The Technical Note concludes that in fact, the growth in the national Gypsy and Traveller population may be as low as 1.25% per annum – much less than the 3.00% per annum often assumed, but still greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2.00% per annum nationally.
- 5.7 The often assumed 3.00% per annum net household growth rate is therefore unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.50% per annum for Gypsies and Travellers. This view has been supported by Planning Inspectors in a number of Decision Notices.

¹² Page 25, Gypsy and Traveller Accommodation Needs Assessments – Guidance (DCLG – 2007) *Now withdrawn*.

- 5.8 In a Decision Notice for an appeal in Doncaster that was issued in November 2016 (Ref: APP/F4410/W/15/3133490) where the agent acting on behalf of the appellant claimed that a rate closer to 3.00% should be used, the Inspector concluded:

In assessing need account also needs to be taken of likely household growth over the coming years. In determining an annual household growth rate, the Council relies on the work of Opinions Research Services (ORS), part of Swansea University. ORS's research considers migration, population profiles, births & fertility rates, death rates, household size data and household dissolution rates to determine average household growth rates for gypsies and travellers. The findings indicate that the average annual growth rate is in the order of 1.5% but that a 2.5% figure could be used if local data suggest a relatively youthful population. As the Council has found a strong correlation between Doncaster's gypsy and traveller population age profile and the national picture, a 1.5% annual household growth rate has been used in its 2016 GTANA. Given the rigour of ORS's research and the Council's application of its findings to the local area I accept that a 1.5% figure is justified in the case of Doncaster.

- 5.9 Another more recent Decision Notice was in relation to an appeal in Guildford that was issued in March 2018 (Ref: APP/W/16/3165526) where the agent acting on behalf of the appellant again claimed that a rate closer to 3.00% should be used. The Inspector concluded:

There is significant debate about household formation rates and the need to meet future growth in the district. The obvious point to make is that this issue is likely to be debated at the local-plan examination. In my opinion, projecting growth rates is not an exact science and the debate demonstrates some divergence of opinion between the experts. Different methodologies could be applied producing a wide range of data. However, on the available evidence it seems to me that the figures used in the GTAA are probably appropriate given that they are derived by using local demographic evidence. In my opinion, the use of a national growth rate and its adaptation to suit local or regional variation, or the use of local base data to refine the figure, is a reasonable approach.

- 5.10 In addition, the Technical Note has recently been accepted as a robust academic evidence base and was published by the Social Research Association in its journal Social Research Practice in December 2017.
- 5.11 ORS assessments take full account of the net local household growth rate per annum calculated on the basis of demographic evidence from the site interviews, and the 'baseline' includes all current authorised households, all households identified as in current need (including concealed households, teenagers in need of a pitch of their own in the next 5 years, movement from bricks and mortar and those on waiting lists not currently living on a pitch or plot), as well as households living on tolerated unauthorised pitches or plots who are not included as current need. The assessments of future need also take account of modelling projections based on birth and death rates, and in-/out-migration.
- 5.12 Overall, the household growth rate used for the assessment of future needs has been informed by local evidence for each local authority. This demographic evidence¹³ has been used to adjust the national growth rate of 1.50% up or down based on the proportion of those aged under 18 in each local authority (by planning status).
- 5.13 In certain circumstances where the numbers of households and children are low it is not appropriate to apply a percentage rate for new household formation. In these cases, a judgement has been made on likely new household formation based on the age and gender of the children. This is based on the

¹³ Age and gender of household members.

assumption that 50% of likely households to form will stay in the area. This is based on evidence from other GTAAs that ORS have completed across England and Wales.

- 5.14 The table below sets out the approach used towards new household formation in each local authority. In addition, the ORS national rates of 1.50% have been used for unknown Gypsies and Travellers and 1.00% for unknown Travelling Showpeople.

Figure 13 – New household formation rates used

| | Gypsies & Travellers | | Travelling Showpeople | |
|-------------------|----------------------------|----------------------------------|-------------------------|----------------------------------|
| | Met Planning Definition | Did not meet Planning Definition | Met Planning Definition | Did not meet Planning Definition |
| Adur | Demographics ¹⁴ | 2.40% (58% under 18) | - | - |
| Arun | 1.75% (42% under 18) | 2.05% (49% under 18) | Demographics | Demographics |
| Chichester | 1.80% (43% under 18) | 1.25% (30% under 18) | 1.65% (40% under 18) | - |
| SDNP | Demographics | - | Demographics | - |
| Worthing | - | - | - | - |

Breakdown by 5 Year Bands

- 5.15 In addition to tables which set out the overall need for Gypsies, Travellers and Travelling Showpeople, the overall need has also been broken down by 5-year bands as required by PPTS. The way that this is calculated is by including all current need (from unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households, 5 year need from teenage children, and net movement from bricks and mortar) in the first 5 years. Total net new household formation is split across the 5-year bands based on the compound rate of growth that was applied – as opposed to being spread evenly.

Applying the Planning Definition

- 5.16 The outcomes from the questions on travelling in the household survey have been used to determine the status of each household against the planning definition in PPTS (2015). This assessment was based on the responses to the questions given to Researchers. Only those households that met the planning definition, in that they were able to provide information during the household interview that household members travel for work purposes, or for seeking work, and stay away from their usual place of residence when doing so – or that they have ceased to travel temporarily due to education, ill health or old age, form the components of need that will form the baseline of need in the GTAA. Households where an interview was not completed who may meet the planning definition have also been included as a potential additional component of need from unknown households. Whilst they do not need to be formally considered in the GTAA, need from households that did not meet the planning definition has

¹⁴ In some circumstances where the numbers of children are low, new household formation is estimated using the age and gender (demographics) of household members.

also been assessed to provide the Councils with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.

Public/Private Split

^{5.17} It will be assumed that all of the need for households living on public sites will need to be met through the provision of additional public pitches and all of the need from households living on private sites will need to be met through the provision of additional private pitches. Many households living on private family sites stated that they have sufficient land on their sites to accommodate additional pitches or accommodation units.

Addressing Outstanding Need from the Previous GTAA

^{5.18} The previous GTAA covered the period 2012-2027 and this new GTAA covers the period 2018-2036. As far as any outstanding need for the period 2012-2017 is concerned this new assessment assumes that supply and demand for the period 2012-2017 net to zero, and the new assessment then starts with a new baseline and identifies all current and future need as of January 2018. As such there is no unmet need from the previous GTAA for local authorities to provide for.

Migration

^{5.19} The study has also sought to address in-migration (households requiring accommodation who move into the study area from outside) and out-migration (households moving away from the study area). Site surveys typically identify only small numbers of in-migrant and out-migrant households and the data is not normally robust enough to extrapolate long-term trends. At the national level, there is nil net migration of Gypsies and Travellers across the UK, but the assessment has taken into account local migration effects on the basis of the best evidence available.

^{5.20} Evidence drawn from stakeholder and household interviews has been considered alongside assessments of need that have been completed in other nearby local authorities. ORS identified a number of instances where households were seeking to move in the next 5 years. Some of these were seeking to develop new sites or yards in the local area and some were planning to move away from the study area. However, it was not felt that this would result in any additional supply as most were seeking to move from overcrowded sites or yards. ORS also found no further evidence from other local studies that have been completed recently of any households wishing to move to the study area. Therefore, net migration to the sum of zero has been assumed for the GTAA – which means that net pitch requirements are driven by locally identifiable need rather than speculative modelling assumptions. Should any households from outside of the study area wish to develop a new site, proposals will need to be considered against criteria-based Local Plan Policies.

Ethnicity of Households

^{5.21} The household interviews asked respondents to state their ethnicity. Of those who responses a total of 76 households were Romany Gypsies, 15 were English Travellers and 10 were Irish Travellers. A number of households stated that they were not Gypsies or Travellers, and these households have been excluded from the baseline for the assessment of need.

6. GTAA Outcomes

- 6.1 The following sections of the report break down the outcomes of the GTAA by the 4 individual local authorities, along with the parts of the South Downs National Park within the 4 local authorities. The outcomes for each local authority include the following information:
- » Sites and Yards in the Study Area.
 - » Stakeholder Engagement.
 - » Survey of Travelling Communities.
 - » Bricks and Mortar/Waiting List Interviews.
 - » Current and Future Need.
 - » Conclusions.
- 6.2 In addition, there is a section on Transit Provision which covers all of the local authority areas.
- 6.3 Due to the nature of the reporting there is unfortunately some repetition in relation to some of the introductory paragraphs for the sections on Stakeholder Engagement and Current and Future Provision.
- 6.4 In addition, the outcomes of the stakeholder engagement with neighbouring local authorities can be found in **Appendix D**.

7. Adur District Council

Sites and Yards in the Study Area

7.1 In Adur, at the baseline date for this study, there was 1 public site with 12 pitches. There were no private sites with permanent or temporary planning permission; no sites that are tolerated for planning purposes; no unauthorised sites; no transit sites and no Travelling Showpeople yards¹⁵. Further details can be found in **Appendix E**.

Figure 14 - Total amount of provision in Adur (January 2018)

| Status | Sites/Yards | Pitches/Plots |
|---|-------------|---------------|
| Private sites with permanent planning permission | 0 | 0 |
| Private sites with temporary planning permission | 0 | 0 |
| Public sites (Council and Registered Providers) ¹⁶ | 1 | 12 |
| Public transit provision | 0 | 0 |
| Private transit provision | 0 | 0 |
| Tolerated sites | 0 | 0 |
| Unauthorised sites | 0 | 0 |
| Travelling Showpeople yards | 0 | 0 |

Stakeholder Engagement

7.2 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.

7.3 An interview was undertaken with Council Officers for both Adur and Worthing as the Councils have operated under a joint management structure since 1 April 2008. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individuals concerned, rather than the official views of the Council.

Accommodation for Gypsies and Travellers

- » A GTAA was completed by ORS in 2013 and an Update was published in 2014, which revised the pitch requirements and identified a need for Adur to provide an additional 4 permanent pitches for Gypsies and Travellers by 2027, all on public sites. The GTAA also identified need for one plot for a Travelling Showperson.

¹⁵ Whilst the previous GTAA identified a single plot on a residential caravan park occupied by a Travelling Showperson household, this household was not identified during the fieldwork for this GTAA and it has been assumed that they have moved away from the area.

¹⁶ One of the pitches on this site is occupied by the Site Warden and has been excluded from the baseline for the purposes of assessing need for additional pitches.

- » There is one public site in Adur and the Officer was not aware of any issues relating to this site. There have been no planning applications, although in the event of a planning application a criteria-based policy is included in the Local Plan which was adopted in December 2017.
- » The last GTAA identified a need for four public pitches and the Local Plan includes a commitment to extending the Withy Patch public site and providing four additional pitches when the site is relocated.
- » Unauthorised encampments are not an issue, and when they have occurred in the past they have been very short-term. The Officer felt the transit site in Chichester has improved the situation.

Cross-Boundary Issues

- » The Officer felt that the Council is complying with the Duty to Cooperate and referenced the joint approach to undertaking GTAA studies. In addition, the issue was not raised at the Adur Local Plan Examination.
- » Although the Officer was unaware of the accommodation need situation in the other West Sussex areas, it was understood that the new transit provision in Chichester was working well.

Future Priorities and Any Further Issues

- » In Adur the priority is to meet the needs of those on the Withy Patch site.
- » The Officer felt it important that they have a criteria-based policy to deal with planning applications should they be made in the future.

Interviews with Gypsies and Travellers

- ^{7.4} One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in **Appendix F** – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.
- ^{7.5} Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority.
- ^{7.6} Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 15 – Summary of fieldwork for Gypsies and Travellers

| Local Authority | Pitches | No Contact | Vacant/Non-Travellers | Refusals | Complete Interviews | Incomplete Interviews |
|-----------------|---------|------------|-----------------------|----------|---------------------|-----------------------|
| Adur | 12 | 2 | 2 | 0 | 8 | 2 |

Figure 16 - Sites and yards visited in Adur

| Planning Status | Pitches/Plots | Interviews | Reasons for not completing interviews |
|---------------------------|---------------|------------|---|
| Public Sites | | | |
| Withy Patch | 12 | 8 | 1 x vacant, 2 x no contact possible, 1 x warden pitch |
| Private Sites | | | |
| None | - | - | - |
| Temporary Sites | | | |
| None | - | - | - |
| Tolerated Sites | | | |
| None | - | - | - |
| Unauthorised Sites | | | |
| None | - | - | - |
| TSP Yards | | | |
| None | - | - | - |
| TOTAL | 12 | 8 | |

Bricks and Mortar/Waiting List Interviews

- 7.7 The 2011 Census recorded 38 households that identified as Gypsies or Irish Travellers in Adur.
- 7.8 Following all of the work that was undertaken to identify households living in bricks and mortar, including trying to contact all of the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all of the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.
- 7.9 A total of 6 of these interviews were completed with households living in Adur. Further information about the needs of these households can be found later in this section of the report.
- 7.10 In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to conclude that no further allowances should be made for bricks and mortar households - other than that from those that were interviewed - because no others identified themselves as being in need.

Additional Pitch and Plot Needs

- 7.11 Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on

whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households in Adur.

Figure 17 – Planning status of households in Adur

| Status | Met Planning Definition | Unknown ¹⁷ | Did Not Meet Planning Definition |
|--------------------------------|-------------------------|-----------------------|----------------------------------|
| Gypsies and Travellers | | | |
| Public Sites | 4 | 3 | 4 |
| Private Sites | 0 | 0 | 0 |
| Temporary Sites | 0 | 0 | 0 |
| Unauthorised Sites | 0 | 0 | 0 |
| Bricks and Mortar/Waiting List | 0 | 0 | 6 |
| Sub-Total | 4 | 3 | 10 |
| Travelling Showpeople | | | |
| Private Yards | 0 | 0 | 0 |
| Temporary Yards | 0 | 0 | 0 |
| Tolerated Yards | 0 | 0 | 0 |
| Unauthorised Yards | 0 | 0 | 0 |
| Sub-Total | 0 | 0 | 0 |
| TOTAL | 4 | 3 | 10 |

^{7.12} Figure 17 shows that for Gypsies and Travellers 4 households met the planning definition of a Traveller in that ORS were able to determine that household members travel for work purposes and stay away from their usual place of residence when doing so or have ceased to travel temporarily. A total of 10 Gypsy and Traveller households did not meet the planning definition as they were not able to demonstrate that household members travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

^{7.13} The households where an interview was not possible are recorded as unknown. The reason for this was households that were not present during the fieldwork period – despite 3 visits.

Bricks and Mortar and Waiting List Interviews

^{7.14} Following the work that was completed to identify households in bricks and mortar and to contact households on the waiting list for public sites a total of 6 interviews were completed. None of these households met the planning definition. A total of 3 interviews were completed with households living in bricks and mortar – 2 expressed a need to move to a site and 1 expressed a need to move to a larger house. The remaining 3 interviews were with households with no fixed abode who expressed a need to live on a permanent pitch in Adur.

¹⁷ Whilst a vacant pitch was identified on the public site at Withy Patch during the fieldwork, Researchers were informed by an Officer from West Sussex County Council that a Gypsy and Traveller tenant had been identified and would shortly be moving on to the pitch.

Pitch Needs – Gypsies and Travellers that met the Planning Definition

- 7.15 The households in Adur that met the planning definition were found on the public site. Analysis of the household interviews indicated that there is a need for **6 additional pitches** and that this is all from new household formation derived from the household demographics.
- 7.16 Therefore, the overall level of additional need for households who met the planning definition of a Gypsy or Traveller is for **6 additional pitches** over the GTAA period.
- 7.17 Whilst the recently adopted Local Plan (2017) includes an allocation for 4 additional pitches as part of the proposal to relocate the public site at Withy Patch, these pitches do not currently have planning permission and cannot be included as components of supply. However, should they be delivered this will reduce the current level of identified need.

Figure 18 – Additional need for Gypsy and Traveller households in Adur that met the Planning Definition 2018-2036

| Gypsies and Travellers - Meeting Planning Definition | | Pitches |
|--|--|----------|
| Supply of Pitches | | |
| Additional supply from vacant public and private pitches ¹⁸ | | 0 |
| Additional supply from pitches on new sites | | 0 |
| Pitches vacated by households moving to bricks and mortar | | 0 |
| Pitches vacated by households moving away from the study area | | 0 |
| Total Supply | | 0 |
| Current Need | | |
| Households on unauthorised developments | | 0 |
| Households on unauthorised encampments | | 0 |
| Concealed households/Doubling-up/Over-crowding | | 0 |
| Movement from bricks and mortar | | 0 |
| Households on waiting lists for public sites | | 0 |
| Total Current Need | | 0 |
| Future Need | | |
| 5 year need from teenage children | | 0 |
| Households on sites with temporary planning permission | | 0 |
| In-migration | | 0 |
| New household formation | | 6 |
| <i>(Formation from household demographics)</i> | | |
| Total Future Needs | | 6 |
| Net Pitch Need = (Current and Future Need – Total Supply) | | 6 |

Figure 19 – Additional need for Gypsy and Traveller households in Adur that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 3 | 1 | 0 | 1 | 1 | 6 |

¹⁸ Whilst a vacant pitch was identified on the public site at Withy Patch during the fieldwork, Researchers were informed by an Officer from West Sussex County Council that a Gypsy and Traveller tenant had been identified and would shortly be moving on to the pitch. As such it has not been considered as a component of supply for the purposes of the assessment of need.

Pitch Needs – Unknown Gypsies and Travellers

- 7.18 Whilst it was not possible to determine the planning status of a total of 3 households as they were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers who may meet the planning definition.
- 7.19 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed. However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 7.20 This would suggest that it is likely that only a small proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 7.21 Whilst it was not possible to complete an interview with these households it was possible to identify the demographics of the households. This indicated a need for up to 2 additional pitches through new household formation over the GTAA period.
- 7.22 If the ORS national average¹⁹ of 25% were applied this could result in a need for no additional pitches. Whilst the proportion of households in Adur that met the planning definition is higher (31%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could also result in a need for 1 additional pitch from unknown households. Tables setting out the components of need for unknown households can be found in **Appendix B**.

Pitch Needs - Gypsies and Travellers that did not meet the Planning Definition

- 7.23 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016) and the revised NPPF (2018).
- 7.24 Need for 17 additional pitches from households that did not meet the planning definition is made up of 1 movement from bricks and mortar, 7 households on the waiting list in need of a pitch of their own (including 2 teenagers who will need a pitch in the next 5 years), 2 teenagers on sites in need of a pitch of their own in the next 5 years, and 7 from new household formation using a rate of 2.40% derived from the household demographics. A summary of this need can be found in **Appendix C**.

¹⁹ Based on the outcomes of over 3,500 interviews completed by ORS in England since 2015.

Travelling Showpeople Needs

7.25 There were no Travelling Showpeople identified in Adur so there is no current or future need for additional plots.

Conclusions

7.26 The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

7.27 In summary there is a need for 6 additional pitches in Adur over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 2 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 17 additional pitches for Gypsy and Traveller households who did not meet the planning definition.

7.28 It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from unknown or new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).

Travelling Showpeople

7.29 There are no Travelling Showpeople in Adur so there is no current or future need for additional plots.

Summary of Need to be Addressed

7.30 Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

7.31 Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 20 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

| Adur | GTAA | SHMA | TOTAL |
|---|----------|-----------|-----------|
| Meet Planning Definition (+ 25% Unknown) | 6 (6+0) | 0 | 6 |
| Do not meet Planning Definition (+ 75% Unknown) | 0 | 19 (17+2) | 19 |
| TOTAL | 6 | 19 | 25 |

Note that the 2014 GTAA Update identified an overall need for 5 additional pitches in Adur.

Travelling Showpeople

^{7.32} Total need from Travelling Showpeople households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 70% (the ORS national average for Travelling Showpeople) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 30% of need from unknown households to the need from households that did not meet the planning definition.

Figure 21 – Additional need for Travelling Showpeople households broken down by potential delivery method 2018-2036

| Adur | GTAA | SHMA | TOTAL |
|---|----------|----------|----------|
| Meet Planning Definition (+ 70% Unknown) | 0 | 0 | 0 |
| Do not meet Planning Definition (+ 30% Unknown) | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 |

Note that the 2013 GTAA²⁰ identified an overall need for 1 additional plot in Adur.

²⁰ The 2014 GTAA Update only applied to pitches for Gypsies and Travellers and not Travelling Showpeople.

8. Arun District Council

Sites and Yards in the Study Area

- 8.1 In Arun, at the baseline date for this study, there was 1 public site with 12 pitches; 7 private sites with permanent planning permission for 17 pitches; no sites with temporary planning permission; no sites that are tolerated for planning purposes; 1 unauthorised site with 2 pitches; and 5 Travelling Showpeople yards with 20 plots. Further details can be found in **Appendix E**.

Figure 22 - Total amount of provision in Arun (January 2018)

| Status | Sites/Yards | Pitches/Plots |
|--|-------------|---------------|
| Private sites with permanent planning permission | 7 | 17 |
| Private sites with temporary planning permission | 0 | 0 |
| Public sites (Council and Registered Providers) | 1 | 12 |
| Public transit provision | 0 | 0 |
| Private transit provision | 0 | 0 |
| Tolerated sites | 0 | 0 |
| Unauthorised sites | 1 | 2 |
| Travelling Showpeople yards | 5 | 20 |

Stakeholder Engagement

- 8.2 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.
- 8.3 An interview was undertaken with a Council Officer in Arun. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individual concerned, rather than the official policy of the Council.

Accommodation for Gypsies and Travellers

- » A GTAA was completed by ORS in 2013 and an Update was published in 2014, which revised the pitch requirements, and identified a need for Arun to provide an additional 14 permanent pitches by 2027. The GTAA also identified need for 7 plots for Travelling Showpeople.
- » The Arun Local Plan includes a policy for Gypsy and Traveller sites and the Council have recently completed its proposed methodology for assessing permanent sites for Gypsies and Travelling Showpeople. It is hoped that once this study has been completed this will be taken forward.
- » The Officer felt that Arun is meeting the needs of Gypsies and Travellers which is currently well planned and was not aware of any overcrowding on the sites or any unauthorised encampments. Arun has met its targets overall in terms of providing a sufficient amount of site accommodation

Short-term Roadside Encampments and Transit Provision

- » The Officer was not aware of any unauthorised encampments and felt the transit site in Chichester was meeting the needs of those Gypsies and Travellers moving through the area.

Cross-Boundary Issues

- » The Officer felt that Arun is complying with the Duty to Cooperate and referenced the joint approach to undertaking GTAA studies in addition to the fact that all the authorities comment on each other's work.

Future Priorities and Any Further Issues

- » The Officer did not identify any future priorities.

Interviews with Gypsies and Travellers

- 8.4 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in **Appendix F** – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.
- 8.5 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority.
- 8.6 Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 23 – Summary of fieldwork for Gypsies and Travellers

| Local Authority | Pitches | No Contact | Vacant/Non-Travellers | Refusals | Complete Interviews | Incomplete Interviews |
|-----------------|---------|------------|-----------------------|----------|---------------------|-----------------------|
| Arun | 31 | 5 | 9 | 2 | 15 | 7 |

Figure 24 - Sites and yards visited in Arun

| Status | Pitches/Plots | Interviews | Reasons for not completing interviews/additional interviews |
|--------------------------------|---------------|------------|---|
| Public Sites | | | |
| Ryebank Caravan Park | 12 | 9 | 1 x refusal, 1 x no contact possible, 1 x wardens pitch |
| Private Sites | | | |
| 2 Wyndham Acres | 4 | 0 | 4 x non-Travellers |
| Dragonfly | 1 | 1 | - |
| Fieldview | 3 | 0 | 1 x refusal, only 1 pitch set out |
| Land at Limmer Pond Stables | 1 | 0 | 1 x no contact possible |
| The Cottage Piggeries | 1 | 0 | 1 x no contact possible |
| The Old Stables | 2 | 0 | Site derelict |
| The Paddocks | 5 | 3 | 2 x no contact possible |
| Temporary Sites | | | |
| None | - | - | - |
| Tolerated Sites | | | |
| None | - | - | - |
| Unauthorised Sites | | | |
| Castle View/The Paddocks | 2 | 2 | - |
| TSP Yards | | | |
| Fairfield | 1 | 0 | 1 x refusal |
| Land at Aldingbourne Farm Shop | 4 | 0 | No longer a Showmen's yard |
| Byton Stables | 8 | 6 | 2 x refusals |
| The Drive | 5 | 4 | 1 x refusal |
| The Old Barn | 2 | 2 | - |
| TOTAL | 51 | 27 | |

Bricks and Mortar/Waiting List Interviews

- 8.7 The 2011 Census recorded 52 households that identified as Gypsies or Irish Travellers in Arun.
- 8.8 Following all of the work that was undertaken to identify households living in bricks and mortar, including trying to contact all of the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all of the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.
- 8.9 A total of 6 of these interviews were completed with households living in Arun. Further information about the needs of these households can be found later in this section of the report.
- 8.10 In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to

conclude that no further allowances should be made for bricks and mortar households - other than that from those that were interviewed - because no others identified themselves as being in need.

Additional Pitch and Plot Needs

8.11 Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households in Arun.

Figure 25 – Planning status of households in Arun

| Status | Met Planning Definition | Unknown | Did Not Meet Planning Definition |
|-------------------------------|-------------------------|-----------|----------------------------------|
| Gypsies and Travellers | | | |
| Public Sites | 3 | 2 | 6 |
| Private Sites | 4 | 5 | 0 |
| Temporary Sites | 0 | 0 | 0 |
| Unauthorised Sites | 2 | 0 | 0 |
| Bricks and Mortar | 0 | 0 | 2 |
| Waiting List | 1 | 0 | 2 |
| Sub-Total | 10 | 7 | 10 |
| Travelling Showpeople | | | |
| Private Yards | 11 | 4 | 1 |
| Temporary Yards | 0 | 0 | 0 |
| Tolerated Yards | 0 | 0 | 0 |
| Unauthorised Yards | 0 | 0 | 0 |
| Sub-Total | 11 | 4 | 1 |
| TOTAL | 21 | 11 | 11 |

8.12 Figure 25 shows that for Gypsies and Travellers 10 households and for Travelling Showpeople 11 households meet the planning definition of a Traveller in that they were able to provide information that household members travel for work purposes and stay away from their usual place of residence when doing so or have ceased to travel temporarily. A total of 10 Gypsy and Traveller households and 1 Travelling Showperson household did not meet the planning definition as they were not able to provide information that household members travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

8.13 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this include households that refused to be interviewed and households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar and Waiting List Interviews

8.14 Following the work that was completed to identify households in bricks and mortar and to contact households on the waiting list for public sites a total of 6 interviews were completed. Only one of these

households met the planning definition, currently has no fixed abode and expressed that they were in need for a permanent pitch on a public site.

- 8.15 For those households that did not meet the planning definition 2 were living in bricks and mortar and 2 had no fixed abode – all expressed a need for a permanent pitch on a public site in Arun (including 1 teenager who will need a pitch of their own in the next 5 years). The remaining household is now settled on a public site and had no additional need.

Pitch Needs – Gypsies and Travellers that met the Planning Definition

- 8.16 The 10 households who met the planning definition of Travelling were found on the public site, 2 of the private sites, on the unauthorised site and with no fixed abode. Analysis of the household interviews indicated that there is a need from 2 pitches that are unauthorised, 1 concealed or doubled-up household or adult, 2 teenage children in need of a pitch of their own in the next 5 years, 1 from the waiting list, and 5 from new household formation using a rate of 1.75% derived from the household demographics. There is also supply from 2 households on the public site seeking to move away from the study area.
- 8.17 Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for **9 additional pitches** over the GTAA period.

Figure 26 – Additional need for Gypsy and Traveller households in Arun that met the Planning Definition 2018-2036

| Gypsies and Travellers - Meeting Planning Definition | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 2 |
| Total Supply | 2 |
| Current Need | |
| Households on unauthorised developments | 2 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 1 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 1 |
| Total Current Need | 4 |
| Future Need | |
| 5 year need from teenage children | 2 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 5 |
| <i>(Household base 12 and formation rate 1.75%)</i> | |
| Total Future Needs | 7 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 9 |

Figure 27 – Additional need for Gypsy and Traveller households in Arun that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 5 | 1 | 2 | 0 | 0 | 1 | 9 |

Pitch Needs – Unknown Gypsies and Travellers

- 8.18 Whilst it was not possible to determine the planning status of a total of 7 households as they either refused to be interviewed or were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.
- 8.19 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 8.20 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 8.21 This would suggest that it is likely that only a small proportion of the potential need identified from unknown households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 8.22 Should further information be made available to the Council that will allow for the planning definition to be applied to the unknown households, the overall level of need could rise by up to 1 for a teenage child in need of a pitch of their own in the next 5 years²¹; and by up to 2 pitches from new household formation (using the ORS national rate of 1.50%). Therefore, additional need could increase by up to a further 3 pitches, plus any concealed adult households or 5-year need arising from older teenagers living in these households (if all 7 unknown pitches are deemed to meet the planning definition).
- 8.23 If the ORS national average of 25% were to be applied this could result in a need for 1 additional pitch. Whilst the proportion of households in Arun that met the planning definition is higher (50%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need for up to 2 additional pitches from unknown households. Tables setting out the components of need for unknown households can be found in **Appendix B**.

Pitch Needs - Gypsies and Travellers that did not meet the Planning Definition

- 8.24 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016) and the revised NPPF (2018).
- 8.25 Overall, there is need for 13 additional pitches for households that did not meet the planning definition. This is made up of 1 concealed or doubled-up household or adult, 3 movement from bricks and mortar,

²¹ It was possible to collect basic demographic information from some households, but this was not sufficient to apply the planning definition.

2 households from the waiting list that are in need of a pitch, 1 teenage child who will be in need of a pitch of their own in the next 5 years, and 6 from new household formation using a formation rate of 2.05% derived from the household demographics.

8.26 A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople

8.27 There are 5 Travelling Showpeople yards in Arun. It was possible to complete an interview with 12 households, 11 that met the planning definition and 1 that did not.

8.28 The GTAA identifies a need for **14 additional plots** for the 11 households that met the planning definition. This is made up of 5 concealed or doubled-up households or adults, 6 teenage children who will be in need of a plot of their own in the next 5 years and 3 from new household formation based on the household demographics.

Figure 28 – Additional need for Travelling Showpeople households in Arun that met the Planning Definition 2018-2036

| Travelling Showpeople – Meeting Planning Definition | Plots |
|---|-----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 5 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 5 |
| Future Need | |
| 5 year need from teenage children | 6 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 3 |
| <i>(Formation from household demographics)</i> | |
| Total Future Needs | 9 |
| Net Plot Need = (Current and Future Need – Total Supply) | 14 |

Figure 29 – Additional need for Travelling Showpeople households in Arun that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 11 | 2 | 1 | 0 | 0 | 0 | 14 |

- 8.29 The GTAA identifies a need of up to 1 additional plot for the unknown households and this is made up of new household formation of 1 from a maximum of 4 households. Whilst no longer a requirement to include in a GTAA there is a need for no additional plots from the 1 household that did not meet the planning definition.

Conclusions

- 8.30 The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

- 8.31 In summary there is a need for 9 additional pitches in Arun over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 3 additional pitches for unknown Gypsy and Traveller households that may meet the planning definition; and a need for 13 additional pitches for Gypsy and Traveller households who did not meet the planning definition.
- 8.32 It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from unknown or new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need – OAN).

Travelling Showpeople

- 8.33 In summary there is a need for 14 additional plots in Arun over the GTAA period to 2036 for Travelling Showpeople households that met the planning definition; a need for up to 1 additional plot for unknown Travelling Showpeople households that may meet the planning definition; and a need for no additional plots for Travelling Showpeople households who did not meet the planning definition.

Summary of Need to be Addressed

- 8.34 Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

- 8.35 Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking

25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 30 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

| Arun | GTAA | SHMA | TOTAL |
|---|-----------|-----------|-----------|
| Meet Planning Definition (+ 25% Unknown) | 10 (9+1) | 0 | 10 |
| Do not meet Planning Definition (+ 75% Unknown) | 0 | 15 (13+2) | 15 |
| TOTAL | 10 | 15 | 25 |

Note that the 2014 GTAA Update identified an overall need for 12 additional pitches in Arun.

Travelling Showpeople

^{8.36} Total need from Travelling Showpeople households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 70% (the ORS national average for Travelling Showpeople) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 30% of need from unknown households to the need from households that did not meet the planning definition.

Figure 31 – Additional need for Travelling Showpeople households broken down by potential delivery method 2018-2036

| Arun | GTAA | SHMA | TOTAL |
|---|-----------|----------|-----------|
| Meet Planning Definition (+ 70% Unknown) | 15 (14+1) | 0 | 15 |
| Do not meet Planning Definition (+ 30% Unknown) | 0 | 0 (0+0) | 0 |
| TOTAL | 15 | 0 | 15 |

Note that the 2013 GTAA identified an overall need for 7 additional plots in Arun.

9. Chichester District Council

Sites and Yards in the Study Area

9.1 In Chichester, at the baseline date for this study, there were 2 public sites with 41 pitches; 1 public transit site with 9 pitches; 32 private sites with permanent planning permission for 96 pitches; 6 private sites with temporary planning permission for 7 pitches; 1 private transit site with 3 pitches; no sites that are tolerated for planning purposes; 6 unauthorised sites with 16 pitches; 4 sites with 8 pitches that are pending a planning application decision; and 28 Travelling Showpeople yards with 43 plots (one of which is pending a decision and one of which is unauthorised). Further details can be found in **Appendix E**.

Figure 32 – Total amount of provision in Chichester (January 2018)

| Status | Sites/Yards | Pitches/Plots |
|--|-------------|---------------|
| Private sites with permanent planning permission | 32 | 96 |
| Private sites with temporary planning permission | 6 | 7 |
| Public sites (Council and Registered Providers) | 2 | 41 |
| Public transit provision | 1 | 9 |
| Private transit provision | 1 | 3 |
| Tolerated sites | 0 | 0 |
| Unauthorised sites | 6 | 16 |
| Private sites pending a decision | 4 | 8 |
| Travelling Showpeople yards | 26 | 38 |
| Travelling Showpeople yards – unauthorised | 1 | 1 |
| Travelling Showpeople yards – pending a decision | 1 | 4 |

Stakeholder Engagement

9.2 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.

9.3 An interview was undertaken with a Council Officer in Chichester. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individual concerned, rather than the official policy of the Council.

Accommodation for Gypsies and Travellers

- » A GTAA was completed by ORS in 2013 and an Update was published in 2014, which revised the pitch requirements, and identified a need for Chichester to provide an additional 52 permanent pitches by 2027. The GTAA also identified need for 18 plots for Travelling Showpeople.
- » Chichester are currently in the process of reviewing their Local Plan. The Council had begun working on a site allocation DPD and were looking to allocate sites, however this process was

postponed due to the change in the planning definition. Once this GTAA is complete this will resume through another Site Allocation DPD.

- » The Officer felt that Chichester may not be fully meeting the accommodation needs of Gypsies and Travellers in the area and referred the number of planning appeals to demonstrate that there is further unmet need. The Officer explained that in the previous Local Plan there was no breakdown of numbers of private and public need which has led to a lack of clarity about need going forward. It is hoped that this study will lead to some clarity about the need for both types of provision. Overall the Officer felt there could be a need for an additional public site, possibly delivered in conjunction with a Housing Association.

Short-term Roadside Encampments and Transit Provision

- » The Officer was of the view that numbers of encampments peak during the summer period and October when there is a fair in the area. There is a new transit site in Chichester that serves the whole of West Sussex.

Cross-Boundary Issues

- » The Officer felt that Chichester is complying with the Duty to Cooperate and referenced the joint approach to undertaking GTAA studies. The Officer also said that during the Local Plan Examination the Inspector commended the authorities for working well together and providing a new transit site.

Future Priorities and Any Further Issues

- » To provide an additional public site.
- » The Officer was aware of the issues that had arisen when Homes Space took over management of the public sites and it was felt that it is currently being managed well by the County. Although it was the view of the Officer that the County should retain its responsibility for these sites, it was acknowledged that some are specialist Housing Associations who could manage the public sites.

Interviews with Gypsies and Travellers

- 9.4 One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in **Appendix F** – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.
- 9.5 Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority.

- 9.6 Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 33 – Summary of fieldwork for Gypsies and Travellers

| Local Authority | Pitches | No Contact | Vacant/Non-Travellers | Refusals | Complete Interviews | Incomplete Interviews |
|-----------------|---------|------------|-----------------------|----------|---------------------|-----------------------|
| Chichester | 180 | 40 | 26 | 30 | 78 | 70 |

Figure 34 – Sites and yards visited in Chichester

| Status | Pitches/Plot | Interviews | Reasons for not completing interviews/additional interviews |
|---|--------------|------------|--|
| Public Sites | | | |
| Easthampnett Caravan Park, Easthampnett | 24 | 16 | 3 x refusals, 4 x no contact possible, 1 x wardens pitch, pitch 12 doubled-up |
| Westbourne Caravan Site | 17 | 10 | 5 x refusals, 2 x no contact possible |
| Private Sites | | | |
| Bridgefoot Meadows | 1 | 0 | 1 x no contact possible |
| C & P Stables | 1 | 1 | - |
| Clearwater | 3 | 0 | 3 x refusals |
| Connors | 3 | 0 | 3 x no contact possible |
| Cowdry Nursery | 1 | 0 | 1 x no contact possible |
| Five Oaks | 1 | 1 | - |
| Land adjacent to Westbourne Gypsy site | 2 | 0 | 2 x unimplemented pitches |
| Land at Lakeside Barn | 3 | 3 | - |
| Land at Marsh Farm | 3 | 3 | - |
| Land East of Tower View Nursery | 4 | 0 | 4 x no contact possible |
| Land lying to the east of Nutbourne Park | 2 | 0 | 2 x unimplemented pitches |
| Land north of Recreation Ground (Meadow View Stables) | 1 | 1 | - |
| Land South of Green Orchards | 5 | 0 | 5 x no contact possible |
| Land South of the Stables | 9 | 0 | 4 x no contact possible, 5 x vacant pitches |
| Land West of Harwood | 5 | 0 | 5 x unimplemented pitches |
| Land West of Hopedene Common Road Westbourne | 12 | 3 | 1 x refusal, 2 x double pitches |
| Littleacre | 6 | 4 | 2 x no contact possible |
| Longacre | 5 | 0 | 4 x refusals, 1 x pitch does not exist |
| Maytrees (Adjacent to Priors Leaze Bungalow) | 1 | 1 | - |
| Melita Nursery | 4 | 4 | - |
| Merston Phesantry (The Vardoe and Treetops) | 8 | 2 | 2 x refusals at The Vardoe; 1 x refusal, 1 x vacant, 2 x no contact possible at Treetops |
| Oaklands, Tower View Nursery (north) | 3 | 0 | 3 x no contact possible |
| Plot B, Pond Farm | 1 | 1 | - |
| Plot J, Pond Farm | 1 | 1 | - |

| | | | |
|--|----|----|---|
| Pond Cottage, Plot A Pond Farm | 1 | 1 | - |
| Sunrise (Adjacent to Southbourne Farm Shop) | 1 | 1 | - |
| The Hawthorns | 1 | 1 | - |
| The Stables, Bracklesham Lane | 1 | 0 | 1 x refusal |
| The Stables, Cemetery Lane | 1 | 0 | 1 x refusal |
| The Willows | 1 | 1 | - |
| Tommys Yard | 1 | 1 | - |
| Tower View Nursery (south) | 4 | 0 | 3 x no contact possible, 1 x unimplemented pitch |
| Temporary Sites | | | |
| 1 and 2 First Acre | 1 | 1 | - |
| Paddock View, Drift Lane | 1 | 1 | - |
| Plot C2 (The Three Horseshoes), Pond Farm | 1 | 1 | - |
| Plot C2A and C2B, Pond Farm | 2 | 1 | 1 x unimplemented pitch |
| Plot F, Pond Farm | 1 | 1 | - |
| Robins Nest, Plot C, Pond Farm | 1 | 1 | - |
| Tolerated Sites | | | |
| None | - | - | - |
| Unauthorised Sites | | | |
| Birdham Farm Plot 12 | 1 | 0 | 1 x no contact possible |
| Birdham Farm Plot 13 | 1 | 0 | 1 x no contact possible |
| Birdham Farm Plot 14 | 1 | 1 | - |
| Birdham Road Plots 1-11 | 11 | 12 | 2 x no contact possible, 2 x doubled-up |
| Land adjacent to Ham Road Sidlesham | 1 | 1 | - |
| The Orchard | 1 | 0 | 1 x non-Travellers |
| Public Transit Sites | | | |
| Westhampnett Transit Site ²² | 9 | 9 | 1 x vacant, 4 want permanent pitches, 5 x in-migration (all travelling constantly with no permanent base) |
| Private Transit Sites | | | |
| 2 Clearwater | 3 | 0 | 3 x refusals |
| Pending | | | |
| Land at 6 Oaklands | 2 | 1 | 1 x no contact possible |
| Land at Junction of Keynor Lane and Selsey Road, | 3 | 0 | 3 x pending |
| Land north of Hawthorns and The Willows | 1 | 0 | 1 x refusal |
| The Old Army Camp, Westbourne | 2 | 0 | 2 x non-Travellers |
| TSP Yards | | | |
| 1 Coneleys Yard, Jury Lane | 1 | 0 | Refusal – 7 x non-Travellers |
| 2 Coneleys Yard (Fairhaven), Jury Lane | 1 | 0 | Refusal – 7 x non-Travellers |

²² The transit site was not full and many of the residents were legitimate transit occupiers who were planning to move on after a short stay. A total of 4 did want a permanent pitch locally and in addition 1 of the households that was interviewed identified 5 relatives with no permanent base who are in need of a pitch locally.

| | | | |
|--|------------|------------|--|
| 3 Coneleys Yard (Braes O Doon), Jury Lane | 1 | 0 | Refusal – 4 x non-Travellers |
| Applegate, Priors Leaze Lane | 1 | 0 | 4 x no contact possible (4 large mobile homes) |
| Coles Yard | 4 | 3 | 1 x refusal |
| Five Paddock Farm, Bracklesham Bay | 1 | 2 | 1 x doubled-up |
| Gateways, Land east of Skiff Farm, Kirdford Road | 1 | 0 | 1 x refusal |
| Heathlands, Priors Leaze Lane | 1 | 0 | 1 x no contact possible |
| Land south east of Tower View Nursery | 2 | 0 | 2 x no contact possible |
| Land to rear of Fairways, Priors Leaze Lane | 6 | 4 | 2 x storage plots |
| Paddock Barn | 1 | 2 | 1 x doubled-up |
| Paddock View, Priors Leaze Lane | 1 | 1 | - |
| Plot 2, Fairways, Priors Leaze Lane | 1 | 2 | 1 x doubled-up |
| Plot 2A, Hower Place, Priors Leaze Lane | 1 | 3 | 2 x doubled-up |
| Plot 2B, Fairs End, Priors Leaze Lane | 1 | 1 | - |
| Plot 2C, Dunromin, Priors Leaze Lane | 1 | 4 | 3 x doubled-up |
| Plot 2C, Fair Acre, Priors Leaze Lane | 1 | 0 | 1 x no contact possible |
| Plot 2C, London Corner, Priors Leaze Lane | 1 | 1 | - |
| Plot 2C, Twin Oaks, Priors Leaze Lane | 1 | 0 | 1 x no contact possible |
| Plot 4A, Scotland Yard, Priors Leaze Lane | 1 | 0 | 4 x no contact possible (4 large mobile homes) |
| Plot 4C, Fairview, Priors Leaze Lane | 1 | 1 | - |
| Plot 4D, Carousel, Priors Leaze Lane | 1 | 0 | 3 x no contact possible (3 large mobile homes) |
| Showlands, Priors Leaze Lane | 1 | 0 | 1 x no contact possible |
| The Old Army Camp, Westbourne | 4 | 0 | 4 x non-Travellers |
| The Old Army Camp, Westbourne | 1 | 0 | 1 x non-Travellers |
| The Woodlands, Westbourne | 1 | 1 | - |
| TSP – Pending | | | |
| New Oak Farm, Priors Leaze Lane | 1 | 0 | 1 x no contact possible |
| TSP – Pending | | | |
| The Old Army Camp, Westbourne | 4 | 0 | 4 x non-Travellers |
| TOTAL | 223 | 111 | |

Bricks and Mortar/Waiting List Interviews

- 9.7 The 2011 Census recorded 55 households that identified as Gypsies or Irish Travellers in Chichester.
- 9.8 Following all the work that was undertaken to identify households living in bricks and mortar, including trying to contact all the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.
- 9.9 A total of 8 of these interviews were completed with households living in Chichester. Further information about the needs of these households can be found later in this section of the report. In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to conclude that no further allowances should be made for bricks and mortar households – other than that from those that were interviewed – because no others identified themselves as being in need.

Additional Pitch and Plot Needs

- 9.10 Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households in Chichester.

Figure 35 – Planning status of households in Chichester

| Status | Meet Planning Definition | Unknown ²³ | Does Not Meet Planning Definition |
|-------------------------------|--------------------------|-----------------------|-----------------------------------|
| Gypsies and Travellers | | | |
| Public Sites | 5 | 15 | 21 |
| Public Transit Sites | 9 | 0 | 0 |
| Private Sites | 22 | 49 | 6 |
| Private transit sites | 0 | 3 | 0 |
| Temporary Sites | 6 | 0 | 0 |
| Unauthorised Sites | 12 | 3 | 2 |
| Pending Sites | 1 | 2 | 0 |
| Bricks and Mortar | 0 | 0 | 0 |
| Waiting List | 2 | 0 | 3 |
| Sub-Total | 57 | 72 | 32 |
| Travelling Showpeople | | | |
| Private Yards | 25 | 19 | 0 |
| Unauthorised Yards | 0 | 1 | 0 |
| Pending Yards | 0 | 0 | 0 |
| Sub-Total | 25 | 20 | 0 |
| TOTAL | 82 | 92 | 32 |

9.11 Figure 35 shows that for Gypsies and Travellers 57 households, and for Travelling Showpeople 25 households met the planning definition of a Traveller - in that they were able to provide information that they travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily. A total of 32 Gypsy and Traveller households did not meet the planning definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

9.12 The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this include households that refused to be interviewed, and households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar and Waiting List Interviews

9.13 Following the work that was completed to identify households in bricks and mortar and to contact households on the waiting list for public sites a total of 8 interviews were completed. Only two of these households met the planning definition. One is living on an unauthorised pitch and the other has no fixed abode and both expressed that they were in need for a permanent pitch on a public site.

9.14 For those households that did not meet the planning definition 1 was living on a private site in Wiltshire but had links to West Sussex, and 2 had no fixed abode - all 3 of these households expressed a need for a permanent pitch on a public site in Chichester. The remaining 3 households were living on sites in Chichester and were also interviewed during the fieldwork, so their needs are already addressed in the GTAA.

²³ Whilst it was possible to interview 2 households on private sites there was insufficient information to determine their planning status.

Pitch Needs – Gypsies and Travellers that met the Planning Definition

- 9.15 The 57 households who met the planning definition of Travelling were found on two of the public sites (including the public transit site), 14 private sites, 6 temporary sites, 2 unauthorised sites and a site which is waiting for a planning application to be determined. Analysis of the household interviews indicated that there is a current need for 10 pitches from households who are living on unauthorised developments, 23 for concealed or doubled up households/adults, and 2 households on the waiting list in need of a permanent pitch. There is also a future need for 17 additional pitches for teenage children in need of a pitch of their own in the next 5 years, 6 for households that are living on pitches with temporary planning permission, and 37 additional pitches as a result of new household formation using a formation rate of 1.80% derived from the household demographics. There is also supply of 1 pitch (on a public site), due to become available in the first five years of the plan period.
- 9.16 Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for **94 additional pitches** over the GTAA period.

Figure 36 – Additional need for Gypsy and Traveller households in Chichester that met the Planning Definition 2018-2036

| Gypsies and Travellers - Meeting Planning Definition | Pitches |
|--|-----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 1 |
| Total Supply | 1 |
| Current Need | |
| Households on unauthorised developments | 10 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 23 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 2 |
| Total Current Need | 35 |
| Future Need | |
| 5 year need from teenage children | 17 |
| Households on sites with temporary planning permission | 6 |
| In-migration | 0 |
| New household formation | 37 |
| <i>(Household base 97 and formation rate 1.80%)</i> | |
| Total Future Needs | 60 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 94 |

Figure 37 – Additional need for Gypsy and Traveller households in Chichester that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 66 | 10 | 11 | 2 | 2 | 3 | 94 |

Pitch Needs – Unknown Gypsies and Travellers

- 9.17 Whilst it was not possible to determine the planning status of a total of 72 households as they either refused to be interviewed or were not on site at the time of the fieldwork, the needs of these households

still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.

- 9.18 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 9.19 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 9.20 This would suggest that it is likely that only a proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 9.21 Should further information be made available to the Council that will allow for the planning definition to be applied to the unknown households, the overall level of need could rise by up to 3 pitches from unauthorised developments, 2 pitches from concealed or doubled up households/adults²⁴ and by up to 23 pitches from new household formation (this uses a base of the 74 households and a net growth rate of 1.50%²⁵). Therefore, additional need could increase by up to a further 28 pitches, plus any concealed adult households or 5-year need arising from older teenagers living in these households (if all 72 unknown pitches are deemed to meet the planning definition).
- 9.22 If the ORS national average of 25% were applied this could result in a need for 7 additional pitches. Whilst the proportion of households in Chichester that met the planning definition is higher (64%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need for up to 18 additional pitches from unknown households. Tables setting out the components of need for unknown households can be found in **Appendix B**.

Pitch Needs - Gypsies and Travellers that did not meet the Planning Definition

- 9.23 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016) and the revised NPPF (2018).
- 9.24 Overall, there is need for 23 additional pitches for households that did not meet the planning definition. This is made up a current need for 2 pitches from households who are living on unauthorised developments, 6 for concealed or doubled up households/adults and 3 households on the waiting list

²⁴ It was possible to obtain demographic information for one household that identified these 2 concealed/double-up households through a proxy interview but it was not possible to assess them against the planning definition.

²⁵ The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

with a need to move to a permanent pitch. Future need is made up of 2 additional pitches for teenage children in need of a pitch of their own in the next 5 years and 10 additional pitches as a result of new household formation using a formation rate of 1.25% derived from the site demographics.

^{9.25} A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople

^{9.26} There are 28 Travelling Showpeople yards in Chichester. It was possible to complete an interview with 25 households and they all met the planning definition of a Traveller.

^{9.27} The GTAA identifies a need for **29 additional plots** for the 25 households that met the planning definition. This is made up of 7 concealed or doubled-up households/adults, 7 teenage children who will be in need of a plot of their own in the next 5 years, 1 from in-migration, and 14 from new household formation using a rate of 1.65% derived from the household demographics.

Figure 38 – Additional need for Travelling Showpeople households in Chichester that met the Planning Definition 2018-2036

| Travelling Showpeople - Meeting Planning Definition | Plots |
|---|-----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 7 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 7 |
| Future Need | |
| 5 year need from teenage children | 7 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 1 |
| New household formation | 14 |
| <i>(Household base 40 and formation rate 1.65%)</i> | |
| Total Future Needs | 22 |
| Net Plot Need = (Current and Future Need – Total Supply) | 29 |

Figure 39 – Additional need for Travelling Showpeople households in Chichester that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 18 | 4 | 4 | 1 | 1 | 1 | 29 |

- 9.28 The GTAA identifies a need for up to 5 additional plots for the 20 unknown households and this is made up of 1 unauthorised plot and new household formation of 4 from a maximum of 20 households. Tables setting out the components of need for unknown households can be found in **Appendix B**.
- 9.29 Whilst no longer a requirement to include in a GTAA there is a need for no additional plots for households that did not meet the planning definition as none were identified in Chichester. A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

Conclusions

- 9.30 The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

- 9.31 In summary there is a need for 94 additional pitches in Chichester over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 28 additional pitches for Gypsy and Traveller households that may meet the planning definition; and a need for 23 additional pitches for Gypsy and Traveller households who did not meet the planning definition.
- 9.32 It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from unknown or new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).

Travelling Showpeople

- 9.33 In summary there is a need for 29 additional plots in Chichester over the GTAA period to 2036 for Travelling Showpeople households that met the planning definition; a need for up to 5 additional plots for Travelling Showpeople households that may meet the planning definition; and a need for no additional plots for Travelling Showpeople households who did not meet the planning definition.

Summary of Need to be Addressed

- 9.34 Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

^{9.35} Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 40 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

| Chichester | GTAA | SHMA | TOTAL |
|---|------------|------------|------------|
| Meet Planning Definition (+ 25% Unknown) | 101 (94+7) | 0 | 101 |
| Do not meet Planning Definition (+ 75% Unknown) | 0 | 44 (23+21) | 44 |
| TOTAL | 101 | 44 | 145 |

Note that the 2014 GTAA Update identified an overall need for 53 additional pitches in Chichester.

Travelling Showpeople

^{9.36} Total need from Travelling Showpeople households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 70% (the ORS national average for Travelling Showpeople) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 30% of need from unknown households to the need from households that did not meet the planning definition.

Figure 41 – Additional need for Travelling Showpeople households broken down by potential delivery method 2018-2036

| Chichester | GTAA | SHMA | TOTAL |
|---|-----------|----------|-----------|
| Meet Planning Definition (+ 70% Unknown) | 33 (29+4) | 0 | 33 |
| Do not meet Planning Definition (+ 30% Unknown) | 0 | 1 (0+1) | 1 |
| TOTAL | 33 | 1 | 34 |

Note that the 2013 GTAA identified an overall need for 18 additional plots in Chichester.

10. South Downs National Park

Sites and Yards in the Study Area

^{10.1} In parts of the four local authorities covered by the SDNP, at the baseline date for this study, there were no public sites; 8 private sites with 25 pitches²⁶; 1 site that is tolerated for planning purposes with 2 pitches; no unauthorised sites; and 1 Travelling Showpeople yard with 1 plot. Further details can be found in **Appendix E**.

Figure 42 - Total amount of provision in SDNP (part) (January 2018)

| Status | Sites/Yards | Pitches/Plots |
|--|-------------|---------------|
| Private sites with permanent planning permission | 8 | 25 |
| Private sites with temporary planning permission | 0 | 0 |
| Public sites (Council and Registered Providers) | 0 | 0 |
| Public transit provision | 0 | 0 |
| Private transit provision | 0 | 0 |
| Tolerated sites | 1 | 2 |
| Unauthorised sites | 0 | 0 |
| Travelling Showpeople yards | 1 | 1 |

Stakeholder Engagement

^{10.2} ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.

^{10.3} An interview was undertaken with an Officer from South Downs National Park. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individual concerned, rather than the official policy of the Council.

Accommodation for Gypsies and Travellers

- » The SDNP has worked with local and county authorities to identify the permanent and transit accommodation needs across the National Park through a series of Gypsy and Traveller Accommodation Assessments (GTAA). The studies covering Hampshire (East Hampshire and Winchester), the Coastal West Sussex area (Adur, Arun, Chichester and Worthing), Brighton and Hove and East Sussex (Eastbourne, Lewes & Wealden) have been undertaken jointly with the local authorities and through liaising with the County Councils.
- » The previous GTAA and subsequent Update completed by ORS identified a need for 6 additional pitches for Gypsies and Travellers and no plots for Travelling Showpeople. Since

²⁶ One of these sites with 1 pitch was allowed at appeal in February 2018 and has been included as an authorised private site.

the completion of the previous GTAA a total of 16 pitches have been provided through a combination of new sites and the granting of permanent permission for those on temporary sites within the SDNP. In addition, it is expected that 2 pitches will become available through the movement of people to bricks and mortar accommodation. This results in the provision of 12 pitches above the identified need of 6 in the period to 2027.

- » The Officer referred to the South Downs Local Plan: Preferred Options Document²⁷ which states: *National policy makes clear that, as with any other form of development, planning permission for sites should only be granted in the National Park where it is demonstrated that the objectives of the designation will not be compromised by the development. Therefore, through the Duty to Cooperate and future site assessment work, the SDNPA will assess how all or a proportion of this need could be accommodated in the National Park. This assessment will be landscape led and will seek to accommodate sites where they are needed and in the most sustainable locations.*

Short-term Roadside Encampments and Transit Provision

- » A new transit site containing 9 pitches has been developed at Westhampnett just outside of the National Park, effectively meeting the need for transit pitches within the area.

Cross-Boundary Issues

- » No sites were identified within any part of the SDNP in Adur, Arun, Chichester or Worthing which may be suitable for transit provision. Both the transit sites at Bridies Tan (Lewes) and Horsdean (Brighton and Hove) are located within the National Park along the A27. Within West Sussex the Westhampnett Transit site just to the south of the A27 is also operational and offers 9 pitches. As part of the joint work in the Hampshire area one site was identified as having potential for a transit site within the Winchester area. This will be considered by that Authority as they prepare their Local Plan.

Interviews with Gypsies and Travellers

- ^{10.4} One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in **Appendix F** – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.
- ^{10.5} Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority.

²⁷ https://www.southdowns.gov.uk/wp-content/uploads/2015/08/Local_Plan_Master_240815_Whole_Document.pdf

- 10.6 Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 43 – Summary of fieldwork for Gypsies and Travellers

| Local Authority | Pitches | No Contact | Vacant/Non-Travellers | Refusals | Complete Interviews | Incomplete Interviews |
|-----------------|---------|------------|-----------------------|----------|---------------------|-----------------------|
| SDNP (part) | 27 | 8 | 13 | 0 | 12 | 8 |

Figure 44 - Sites and yards visited in SDNP (part)

| Status | Pitches/Plots | Interviews | Reasons for not completing interviews/additional interviews |
|----------------------------------|---------------|------------|---|
| Public Sites | | | |
| None | - | - | - |
| Private Sites | | | |
| Coventry Plantation, Arun | 7 | 2 | 6 x no contact possible (1 additional household) |
| Forest View Park, Arun | 12 | 0 | 12 x non-Travellers |
| Holly Farm Stables, Chichester | 1 | 2 | 1 x doubled-up |
| Old Timbers, Arun | 1 | 1 | - |
| Savi Maski Granzi Stable, Arun | 1 | 4 | 3 x proxy interviews |
| The Wood Yard, Arun | 1 | 0 | 1 x non-Travellers |
| Three Cornered Piece, Chichester | 1 | 1 | 1 x proxy interview from appeal documents |
| Wychway Farm, Arun | 1 | 1 | - |
| Temporary Sites | | | |
| None | - | - | - |
| Tolerated Sites | | | |
| Titnore Lane | 2 | 0 | 2 x no contact possible |
| Unauthorised Sites | | | |
| None | - | - | - |
| TSP Yards | | | |
| Fairhaven, Arun | 1 | 1 | - |
| TOTAL | 28 | 12 | |

Bricks and Mortar/Waiting List Interviews

- 10.7 It was not possible to obtain a breakdown of the number of households from the 2011 Census in SDNP who identified as Gypsies or Irish Travellers.
- 10.8 Following all of the work that was undertaken to identify households living in bricks and mortar, including trying to contact all of the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all of the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to

the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.

- ^{10.9} None of these interviews were completed with households living in these parts of the SDNP. In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to conclude that no further allowances should be made for bricks and mortar households - other than that from those that were interviewed - because no others identified themselves as being in need.

Additional Pitch and Plot Needs

- ^{10.10} Information that was sought from households where an interview was completed allowed each household to be assessed against the planning definition of a Traveller. This included information on whether households have ever travelled; why they have stopped travelling; the reasons that they travel; and whether they plan to travel again in the future. The table below sets out the planning status of households that are in these parts of the SDNP.

Figure 45 – Planning status of households in South Downs National Park (part)

| Status | Meet Planning Definition | Unknown | Does Not Meet Planning Definition |
|-------------------------------|--------------------------|----------|-----------------------------------|
| Gypsies and Travellers | | | |
| Private Sites | 10 | 6 | 1 |
| Tolerated Sites | 0 | 2 | 0 |
| Sub-Total | 10 | 8 | 1 |
| Travelling Showpeople | | | |
| Private Yards | 1 | 0 | 0 |
| Sub-Total | 1 | 0 | 0 |
| TOTAL | 11 | 8 | 1 |

- ^{10.11} Figure 45 shows that for Gypsies and Travellers 10 households, and for Travelling Showpeople 1 household meet the planning definition of a Traveller - in that they were able to provide information that they travel for work purposes and stay away from their usual place of residence or have ceased to travel temporarily. A total of 1 Gypsy and Traveller household did not meet the planning definition as they were not able to provide information that they travel away from their usual place of residence for the purpose of work, or that they have ceased to travel temporarily due to children in education, ill health or old age. Some did travel for cultural reasons, to visit relatives or friends, and others had ceased to travel permanently – these households did not meet the planning definition.

- ^{10.12} The number of households on each site where an interview was not possible are recorded as unknown. The reasons for this include households that were not present during the fieldwork period – despite up to 3 visits.

Bricks and Mortar and Waiting List Interviews

- ^{10.13} Following the work that was completed to identify households in bricks and mortar and to contact households on the waiting list for public sites it was not possible to complete any interviews.

Pitch Needs – Gypsies and Travellers that met the Planning Definition

10.14 The 10 households who met the planning definition of Travelling were found on 5 of the private sites. Analysis of the household interviews indicated that there is a current need 4 additional pitches for concealed or doubled up households/adults. There is also a future need for 9 additional pitches for teenage children and other households in need of a pitch of their own in the next 5 years, and 3 additional pitches as a result of new household formation derived from the household demographics.

10.15 Therefore, the overall level of additional need for those households who met the planning definition of a Gypsy or Traveller is for **16 additional pitches** over the GTAA period.

10.16 Figure 47 also includes a breakdown of the need for each of the 4 local authorities.

Figure 46 – Additional need for Gypsy and Traveller households in SDNP (part) that met the Planning Definition 2018-2036

| Gypsies and Travellers - Meeting Planning Definition | Pitches |
|--|-----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 4 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 4 |
| Future Need | |
| 5 year need from teenage children | 9 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 3 |
| <i>(Formation from household demographics)</i> | |
| Total Future Needs | 12 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 16 |

Figure 47 – Additional need for Gypsy and Traveller households in SDNP (part) that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------------------|-----------|----------|----------|----------|----------|----------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| Adur | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arun | 8 | 0 | 0 | 0 | 0 | 0 | 8 |
| Chichester | 5 | 2 | 1 | 0 | 0 | 0 | 8 |
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 13 | 2 | 1 | 0 | 0 | 0 | 16 |

Pitch Needs – Unknown Gypsies and Travellers

- 10.17 Whilst it was not possible to determine the planning status of a total of 8 households as they were not on site at the time of the fieldwork, the needs of these households still need to be recognised by the GTAA as they are believed to be Gypsies and Travellers and may meet the planning definition.
- 10.18 ORS are of the opinion that it would not be appropriate when producing a robust assessment of need to make any firm assumptions about whether or not households where an interview was not completed meet the planning definition based on the outcomes of households in that local authority where an interview was completed.
- 10.19 However, data that has been collected from over 3,500 household interviews that have been completed by ORS since the changes to PPTS in 2015 suggests that nationally approximately 25% of households that have been interviewed meet the planning definition – and in some local authorities, particularly London Boroughs, no households meet the planning definition.
- 10.20 This would suggest that it is likely that only a proportion of the potential need identified from these households will need conditioned Gypsy and Traveller pitches, and that the needs of the majority will need to be considered as part of the wider housing needs of the area and through separate Local Plan Policies.
- 10.21 Should further information be made available to the Council that will allow for the planning definition to be applied to the unknown households, the overall level of need could rise by up to 2 pitches from new household formation (this uses a base of the 8 households and a net growth rate of 1.50%²⁸). Therefore, additional need could increase by up to a further 2 pitches, plus any concealed adult households or 5-year need arising from older teenagers living in these households (if all 8 unknown pitches are deemed to meet the planning definition).
- 10.22 If the ORS national average of 25% were applied this could result in a need for no additional pitches. Whilst the proportion of households in these parts of the SDNP that met the planning definition is higher (90%) than 25% this is based on a small household base. Therefore, it is felt that it would be more appropriate to consider the more statistically robust ORS national figure. However, if the locally derived proportion were to be applied this could result in a need for 2 additional pitches from unknown households. Tables setting out the components of need for unknown households can be found in **Appendix B**.

Pitch Needs - Gypsies and Travellers that did not meet the Planning Definition

- 10.23 It is not now a requirement for a GTAA to include an assessment of need for households that did not meet the planning definition. However, this assessment is included for illustrative purposes to provide the Council with information on levels of need that will have to be considered as part of the wider housing needs of the area and through separate Local Plan Policies, and to help meet requirements set out in the Housing and Planning Act (2016) and the revised NPPF (2018).

²⁸ The ORS Technical Note on Population and Household Growth has identified a national growth rate of 1.50% for Gypsies and Travellers which has been applied in the absence of further demographic information about these households.

10.24 Overall, there is need for 2 additional pitches for the household that did not meet the planning definition. This is made up future need for 2 additional pitches for teenage children in need of a pitch of their own in the next 5 years. There is no other current or future need associated with this household.

10.25 A summary of this need for households that did not meet the planning definition can be found in **Appendix C**.

Travelling Showpeople Needs

Plot Needs – Travelling Showpeople

10.26 There is 1 Travelling Showpeople yard in these parts of the SDNP and it was possible to complete an interview with the resident household and they met the planning definition of a Traveller. The GTAA identifies a need for **1 additional plot** and this from new household formation derived from the household demographics. There is no other current or future need identified.

Figure 48 – Additional need for Travelling Showpeople households in SDNP (part) that met the Planning Definition 2018-2036

| Travelling Showpeople - Meeting Planning Definition | Plots |
|---|----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 years need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 1 |
| <i>(Formation from household demographics)</i> | |
| Total Future Needs | 1 |
| Net Plot Need = (Current and Future Need – Total Supply) | 1 |

Figure 49 – Additional need for Travelling Showpeople households in SDNP (part) that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 1 | 0 | 0 | 0 | 1 |

10.27 The GTAA identifies a need for no additional plots for unknown households or households that did not meet the planning definition as none were present in these parts of the SDNP. Tables setting out the

components of need for unknown households and households that did not meet the planning definition can be found in **Appendices B and C**.

Conclusions

^{10.28} The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

^{10.29} In summary there is a need for 16 additional pitches in the areas of the SDNP that fall within the study area over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 2 additional pitches for unknown Gypsy and Traveller households that may meet the planning definition; and a need for 2 additional pitches for Gypsy and Traveller households who did not meet the planning definition.

^{10.30} It is recommended that need for households that met the planning definition is addressed through new pitch allocations or the expansion or intensification of existing sites. Any need arising from unknown or new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy. The need for households who did not meet the planning definition should be addressed as part of general housing need and through separate Local Plan Policies (including any plans that have already been adopted, as all Travellers will have been included as part of the overall Objectively Assessed Need - OAN).

Travelling Showpeople

^{10.31} In summary there is a need for 1 additional plot in SDNP over the GTAA period to 2036 for Travelling Showpeople households that met the planning definition; a need for no additional plots for unknown Travelling Showpeople households that may meet the planning definition; and a need for no additional plots for Travelling Showpeople households who did not meet the planning definition.

Summary of Need to be Addressed

^{10.32} Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

^{10.33} Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding

this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 50 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

| SDNP | GTAA | SHMA | TOTAL |
|---|-----------|----------|-----------|
| Meet Planning Definition (+ 25% Unknown) | 16 (16+0) | 0 | 16 |
| Do not meet Planning Definition (+ 75% Unknown) | 0 | 4 (2+2) | 4 |
| TOTAL | 16 | 4 | 20 |

Note that the 2014 GTAA Update identified an overall need for 8 additional pitches in SDNP.

Travelling Showpeople

^{10.34} Total need from Travelling Showpeople households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 70% (the ORS national average for Travelling Showpeople) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 30% of need from unknown households to the need from households that did not meet the planning definition.

Figure 51 – Additional need for Travelling Showpeople households broken down by potential delivery method 2018-2036

| SDNP | GTAA | SHMA | TOTAL |
|---|----------|----------|----------|
| Meet Planning Definition (+ 70% Unknown) | 1 (1+0) | 0 | 1 |
| Do not meet Planning Definition (+ 30% Unknown) | 0 | 0 (0+0) | 0 |
| TOTAL | 1 | 0 | 1 |

Note that the 2013 GTAA identified an overall need for no additional plots in SDNP.

11. Worthing Borough Council

Sites and Yards in the Study Area

11.1 In Worthing, at the baseline date for this study, there were no Gypsy and Traveller sites or Travelling Showpeople yards, apart from a site located in the South Downs National Park that is included in Chapter 10.

Figure 52 - Total amount of provision in Worthing (January 2018)

| Status | Sites/Yards | Pitches/Plots |
|--|-------------|---------------|
| Private sites with permanent planning permission | 0 | 0 |
| Private sites with temporary planning permission | 0 | 0 |
| Public sites (Council and Registered Providers) | 0 | 0 |
| Public transit provision | 0 | 0 |
| Private transit provision | 0 | 0 |
| Tolerated sites | 0 | 0 |
| Unauthorised sites | 0 | 0 |
| Travelling Showpeople yards | 0 | 0 |

Stakeholder Engagement

11.2 ORS undertook a stakeholder engagement programme to complement the information gathered through interviews with members of the Travelling Community. This consultation took the form of telephone interviews which were tailored to the role of the individual. The aim of these interviews is to provide an understanding of current provision and possible future need; short-term encampments; transit provision; and cross-border issues.

11.3 An interview was undertaken with Council Officers for both Adur and Worthing as the Councils have operated under a joint management structure since 1 April 2008. Due to issues surrounding data protection, and in order to protect the anonymity of those who took part, this section presents a summary of the views expressed by interviewees and verbatim comments have not been used. The narrative represents a balanced summary of the views of the individuals concerned, rather than the official policy of the Council.

Accommodation for Gypsies and Travellers

- » A GTAA was completed by ORS in 2013 and an Update was published in 2014. The GTAA did not identify a need for any new pitches or plots in Worthing.
- » There are currently no sites in Worthing apart from those located within the South Downs National Park. The Council are currently undertaking a Worthing Local Plan Review. The previous Core Strategy did not include a criteria-based policy as there were no sites in Worthing and the Inspector at the time of the Examination accepted that there was sufficient national guidance on pitch design/requirements to be able to determine a planning application should one come forward.
- » After the previous GTAA was completed the nil need identified in Worthing was questioned at a meeting of the Sussex Traveller Action Group (STAG). At the meeting the Council explained that every effort had been made to engage with Travellers in Worthing, including working

closely with members of the Traveller Education Service, and that no need had been identified despite these efforts.

- » There have been no planning applications in Worthing for new pitches or plots. The Worthing Local Plan is currently being reviewed and a criteria-based policy will be included.
- » Unauthorised encampments are not an issue, and when they have occurred in the past they have been very short-term. The Officer felt the transit site in Chichester has improved the situation.

Cross-Boundary Issues

- » The Officer felt that the Council are complying with the Duty to Cooperate and referenced the joint approach to undertaking GTAA studies.
- » Whilst the Officer was unaware of the accommodation need situation in the other West Sussex areas, it was understood that the new transit provision in Chichester was working well.

Future Priorities and Any Further Issues

- » The Officer for Worthing felt it difficult to identify any future priorities given there is no identified need.
- » The Officer felt it important that they have a criteria-based policy to deal with planning applications should they be made in the future.

Interviews with Gypsies and Travellers

- ^{11.4} One of the major components of this study was a detailed survey of the Gypsy, Traveller and Travelling Showpeople population living on sites and yards in the study area. This aimed to identify current households with housing needs and to assess likely future housing need from within existing households, to help judge the need for any future pitch provision. The household interview questions can be found in **Appendix F** – although the interviews were conducted using Computer Aided Personal Interviewing (CAPI) tablets.
- ^{11.5} Through the desk-based research and stakeholder interviews ORS sought to identify all authorised and unauthorised sites and yards in the study area. Interviews were completed between December 2017 and March 2018. Up to 3 attempts were made to interview each household where they were not present when interviewers visited. The tables below identify the sites that ORS staff visited during the course of the fieldwork, and also set out the number of interviews that were completed at each site, together with the reasons why interviews were not completed and reasons why any additional interviews were completed. The site lists were agreed with the local authority.
- ^{11.6} Due a number of additional interviews that were completed on some of the sites it is not possible to set out the overall response rates for Gypsies and Travellers. However, the table below provides an overview of the number pitches; the number of interviews that were completed; reasons for not completing interviews; and the number of pitches where it was not possible to complete an interview.

Figure 53 – Summary of fieldwork for Gypsies and Travellers

| Local Authority | Pitches | No Contact | Vacant/Non-Travellers | Refusals | Complete Interviews | Incomplete Interviews |
|-----------------|---------|------------|-----------------------|----------|---------------------|-----------------------|
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 |

Figure 54 - Sites and yards visited in Worthing

| Status | Pitches/Plots | Interviews | Reasons for not completing interviews/additional interviews |
|---------------------------|---------------|------------|---|
| Public Sites | | | |
| None | - | - | - |
| Private Sites | | | |
| None | - | - | - |
| Temporary Sites | | | |
| None | - | - | - |
| Tolerated Sites | | | |
| None | - | - | - |
| Unauthorised Sites | | | |
| None | - | - | - |
| TSP Yards | | | |
| None | - | - | - |
| TOTAL | 0 | 0 | |

Bricks and Mortar/Waiting List Interviews

- 11.7 The 2011 Census recorded 39 households that identified as Gypsies or Irish Travellers in Worthing.
- 11.8 Following all of the work that was undertaken to identify households living in bricks and mortar, including trying to contact all of the households on the waiting list for public sites, a total of 20 telephone interviews were completed across all of the local authorities in Coastal West Sussex. Of these, 5 were living in bricks and mortar; 9 stated that they had no fixed abode; 4 were living on public or private sites in the study area; 1 was living on an unauthorised site in the study area; and 1 was living on a private site outside of the study area. From the 67 numbers that were provided for households on the waiting list a total of 17 were disconnected. A total of 20 completed interviews from an adjusted baseline of 50 valid telephone numbers represents a very good response rate and number of completed interviews when compared to the majority of the GTAA studies that have been completed by ORS across England and Wales in recent years.
- 11.9 Although the 2011 Census recorded 39 households that identified as Gypsies or Irish Travellers in Worthing, none of these came forward to be interviewed despite all of the efforts that were made during the study.
- 11.10 In addition, no further household in bricks and mortar are known to have approached the Council during the GTAA study period seeking a site and none have declared themselves homeless. As such it is fair to conclude that no further allowances should be made for bricks and mortar households - other than that from those that were interviewed - because no others identified themselves as being in need.

Additional Pitch and Plot Needs

11.11 There were no Gypsies, Travellers or Travelling Showpeople sites or yards identified in Worthing apart from a small site on Titnore Lane that is within the South Downs National Park which has been included in their assessment of need (see Chapter 10).

11.12 Despite all the efforts that were made during the course of the GTAA, no other Gypsy or Traveller sites were identified in Worthing, and no households were identified to interview living in bricks and mortar, despite a small number of households being identified in the 2011 Census. These efforts included discussions with Council Officers and other local stakeholders including the Traveller Education Service and Friends, Families and Travellers; attempts to contact all the households on the waiting list for a public site in West Sussex; and discussions with Travellers living on other sites in West Sussex asking if they had any relatives or friends who may be in need of a pitch on a site. As such there is no current or future need for additional pitches in Worthing over the GTAA period to 2036, other than from sites within SDNP (see Chapter 10). This is consistent with the previous GTAA study which also found a need for no additional pitches in Worthing.

Figure 55 – Additional need for Gypsy and Traveller households in Worthing that met the Planning Definition 2018-2036

| Gypsies and Travellers - Meeting Planning Definition | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Gypsies or Travellers identified in Worthing)</i> | |
| Total Future Needs | 0 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 0 |

Figure 56 – Additional need for Gypsy and Traveller households in Worthing that met the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Conclusions

11.13 The assessment of need provides a robust evidence base to enable the Council to assess the housing needs of the Travelling Community as well as complying with their requirements towards Gypsies, Travellers and Travelling Showpeople under the Housing Act 1985, Planning Practice Guidance (PPG) 2014, Planning Policy for Traveller Sites (PPTS) 2015, the Housing and Planning Act 2016, and the National Planning Policy Framework (NPPF) 2018. It also provides the evidence base which can be used to support Local Plan Policies.

Gypsies and Travellers

11.14 In summary there is a need for no additional pitches in Worthing over the GTAA period to 2036 for Gypsy and Traveller households as none were identified apart from a small tolerated site that falls within the boundary of the SNDP and has been included in their assessment of need (see Chapter 10).

11.15 It is recommended that any need arising from new households seeking to move to the area and develop a site should be addressed through a criteria-based Local Plan Policy.

Travelling Showpeople

11.16 In summary there is a need for no additional plots in Worthing over the GTAA period to 2036 for Travelling Showpeople households as none were identified.

Summary of Need to be Addressed

11.17 Taking into consideration all of the elements of need that have been assessed and identified, together with the assumptions on the proportion of unknown households that are likely to meet the planning definition, the tables below set out the likely number of pitches/plots that will need to be addressed either as a result of the GTAA, or through the Housing Need Assessment process and through separate Local Plan Policies.

Gypsies and Travellers

11.18 Total need from Gypsy and Traveller households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 25% (the ORS national average for Gypsies and Travellers) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 75% of need from unknown households to the need from households that did not meet the planning definition.

Figure 57 – Additional need for Gypsy and Traveller households broken down by potential delivery method 2018-2036

| Worthing | GTAA | SHMA | TOTAL |
|---|----------|----------|----------|
| Meet Planning Definition (+ 25% Unknown) | 0 | 0 | 0 |
| Do not meet Planning Definition (+ 75% Unknown) | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 |

Note that the 2014 GTAA Update also identified an overall need for no additional pitches in Worthing.

Travelling Showpeople

^{11.19}Total need from Travelling Showpeople households is made up by adding together need from households that met the planning definition, need from unknown households, and need from households that did not meet the planning definition. The tables below break need down by the GTAA and SHMA by taking 70% (the ORS national average for Travelling Showpeople) of need from unknown households and adding this to the need from households that met the planning definition, and by adding the remaining 30% of need from unknown households to the need from households that did not meet the planning definition.

Figure 58 – Additional need for Travelling Showpeople households broken down by potential delivery method 2018-2036

| Worthing | GTAA | SHMA | TOTAL |
|---|----------|----------|----------|
| Meet Planning Definition (+ 70% Unknown) | 0 | 0 | 0 |
| Do not meet Planning Definition (+ 30% Unknown) | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 |

Note that the 2013 GTAA also identified an overall need for no additional plots in Worthing.

12. Transit Requirements – All Local Authorities

- 12.1 It is acknowledged that it is difficult to robustly determine the need for transit provision through individual GTAA studies as transit requirements are more of a regional, if not a national issue, that need to be addressed in a more strategic manner. In addition, changes to the PPTS in 2015 are seen by many organisations that represent the Travelling Community as a catalyst that will potentially increase the number of households seeking to travel and be in need of transit provision.
- 12.2 When assessing transit provision in the study area the assessment has looked at the outcomes of the West Sussex Transit Site Study that was published in 2013, the outcomes of the stakeholder interviews and details of existing transit sites, data from the MHCLG Traveller Caravan Count, and the potential wider issues associated with changes to the PPTS in 2015.

West Sussex Transit Site Study

- 12.3 The West Sussex Transit Site Study was prepared by ORS and published in 2013. Following a comprehensive assessment of the need from transient households, the Study recommended that West Sussex develop a public transit site on the basis that:
- » There is currently extremely limited private transit site provision in West Sussex and a public transit site would offer an alternative to all Gypsy and Traveller households visiting the county. Areas without a site are believed to offer a reduced service to Gypsies and Travellers moving through their area
 - » Evidence from around the UK and Sussex shows that providing a transit site, if managed well, reduces the numbers of unauthorised encampments and the overall cost associated with managing encampments
 - » Adopting a transit site to help manage unauthorised encampments would create a consistent approach in Sussex with all three areas providing a transit provision
 - » In areas where no transit sites or pitches are provided there are less options available to facilitate enforcement action
 - » It would provide another tool to manage encampments because of the ability to direct Travellers to that site through the use of S62A
 - » In areas where there are no transit sites or pitches it can be difficult to provide for Travellers welfare needs by the roadside
 - » Adopting an approach to managing unauthorised encampments which includes transit provision reportedly decreases community tensions
 - » Using a transit site will protect recreational areas from disruption from encampments
 - » Experience of areas with a transit site has proved there are politically acceptable as it reassures the local community.
- 12.4 As a result of these recommendations, a public transit site with 9 pitches was developed in Westhampnett, Chichester, and opened in 2015.

Stakeholder Interviews and Local Data

- 12.5 Information from the stakeholder interviews confirmed that there are low levels of unauthorised encampments in most local authorities in the study area, and that most are transient and passing through for short periods of time.
- 12.6 The stakeholder interviews suggest that the transit site that was opened in 2015 has been successful, and whilst it hasn't significantly reduced the overall number of encampments, the number of encampment days have reduced significantly as the Police now have a site to direct households on encampments to or to ask them to move on.
- 12.7 It was reported that the site is well used during the travelling season. When the site was visited during the fieldwork for the GTAA there was only one vacant pitch and most residents stated that they were only staying for a short period of time before moving on.
- 12.8 There are also 3 transit pitches on a private site in Chichester. Whilst these cannot be used by the Police to move households on to, they do provide provision to friends and family members coming to stay in the area – therefore removing the potential for some additional encampments

MHCLG Traveller Caravan Count

- 12.9 Whilst it is considered to be a comprehensive national dataset on numbers of authorised and unauthorised caravans across England, it is acknowledged that the Traveller Caravan Count is a count of caravans and not households. It also does not record the reasons for unauthorised caravans or any demographic information about residents. This makes it very difficult to interpret in relation to assessing current and future need because it does not count pitches or resident households. The count is also only a twice yearly (January and July) 'snapshot in time' conducted by local authorities on a specific day, and any caravans on unauthorised sites or encampments which occur on other dates are not recorded. Likewise, any caravans that are away from sites on the day of the count are not included. As such it is not considered appropriate to use the outcomes from the Traveller Caravan Count in the assessment of current or future transit provision. It does however provide valuable historic and trend data on whether there are instances of unauthorised caravans in local authority areas.
- 12.10 Data from the Traveller Caravan Count shows that there have been none or very low numbers of non-tolerated unauthorised caravans on land not owned by Travellers recorded by local authorities in the study area. However, as set out above this is just a snapshot and does not give a full picture of unauthorised encampments and potential need for transit provision across the study area.

Potential Implications of PPTS (2015)

- 12.11 It has been suggested by a number of organisations representing members of the Travelling Community that there will need to be a large increase in transit provision across the country as a result changes to the PPTS in 2015 leading to more households travelling to seek to meet the planning definition. This may well be the case, but it will take some time for any changes in travelling behaviour to materialise.

Transit Recommendations

- 12.12 As there is currently a public transit site in Chichester it is recommended that this is used in the first instance to deal with any unauthorised encampments and that no additional transit provision is required at this time.
- 12.13 Due to potential changes to travelling behaviour as a result of changes to PPTS (2015) the use of historic evidence to assess current and future transit need is not recommended. Any recommendations for any new transit provision will need to make use of a robust post-PPTS (2015) evidence base. It is therefore recommended that the situation relating to levels of unauthorised encampments throughout the area should be monitored whilst any potential changes associated with PPTS (2015) develop.
- 12.14 This monitoring information should be collected as part of a Welfare Assessment (or equivalent) that is completed with households on unauthorised encampments. The way in which Welfare Assessments are carried out varies between local authorities, however, to provide robust input into the assessment of need for any further transit provision it is recommended that local authorities should consider collecting the following information:
- » Numbers of households, caravans and other vehicles.
 - » Reasons why households are in the local area.
 - » How long households are planning to stay in the local area.
 - » Whether households have a permanent place of resident elsewhere.
 - » Where households have come from and where they are planning to move on to next.
 - » Whether households would consider staying on a transit site if one were available.
 - » Whether households have permanent accommodation need in the local area.
- 12.15 A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken once there is a sufficient local evidence base following the changes to PPTS in 2015. This will establish whether there is a need for investment in any further formal transit sites or emergency stopping places, or whether a managed approach is preferable alongside the public transit pitches in Chichester. It is recommended that a post-GTAA period of 3 years should be considered
- 12.16 In the short-term, as well as the transit site in Chichester, the Councils could consider the use of management-based arrangements for dealing with unauthorised encampments and could also consider the use of Negotiated Stopping Agreements, as opposed to taking forward an infrastructure-based approach.
- 12.17 The term ‘negotiated stopping’ is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent ‘built’ transit sites but negotiated agreements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. Agreements are made between the Council and the (temporary) residents regarding expectations on both sides.
- 12.18 Temporary stopping places can be made available at times of increased demand due to fairs or cultural celebrations that are attended by Gypsies and Travellers. A charge may be levied as determined by the local authority although they only need to provide basic facilities including: a cold-water supply; portaloos; sewage disposal point and refuse disposal facilities.

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Appendix A: Glossary of Terms

| | |
|-------------------------------------|--|
| Amenity block/shed | A building where basic plumbing amenities (bath/shower, WC, sink) are provided. |
| Bricks and mortar | Mainstream housing. |
| CAPI | Computer Assisted Personal Interviewing. |
| Caravan | Mobile living vehicle used by Gypsies and Travellers. Also referred to as trailers. |
| Chalet | A single storey residential unit which can be dismantled. Sometimes referred to as mobile homes. |
| Concealed household | Households, living within other households, who are unable to set up separate family units. |
| DCLG | Department for Communities and Local Government (now MHCLG). |
| Doubling-Up | Where there are more than the permitted number of caravans on a pitch or plot. |
| Emergency Stopping Place | A temporary site with limited facilities to be occupied by Gypsies and Travellers while they travel. |
| Green Belt | A land use designation used to check the unrestricted sprawl of large built-up areas; prevent neighbouring towns from merging into one another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist in urban regeneration, by encouraging the recycling of derelict and other urban land. |
| GTAA | Gypsy and Traveller Accommodation Assessment. |
| HEDNA | Housing and Economic Development Needs Assessment. |
| Household formation | The process where individuals form separate households. This is normally through adult children setting up their own household. |
| In-migration | Movement into or come to live in a region or community. |
| LHNA | Local Housing Need Assessments |
| Local Plans | Local Authority spatial planning documents that can include specific policies and/or site allocations for Gypsies, Travellers and Travelling Showpeople. |
| MHCLG | Ministry of Housing, Communities and Local Government (formerly DCLG). |
| NPPF | National Planning Policy Framework. |
| ORS | Opinion Research Services. |
| Out-migration | Movement from one region or community in order to settle in another. |
| Personal planning permission | A private site where the planning permission specifies who can occupy the site and doesn't allow transfer of ownership. |

| | |
|--------------------------------------|---|
| Pitch/plot | Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards. |
| PPG | Planning Practice Guidance. |
| PPTS | Planning Policy for Traveller Sites. |
| Private site | An authorised site owned privately. Can be owner-occupied, rented or a mixture of owner-occupied and rented pitches. |
| SHMA | Strategic Housing Market Assessment. |
| Site | An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots. |
| Social/Public/Council Site | An authorised site owned by either the local authority or a Registered Housing Provider. |
| Temporary planning permission | A private site with planning permission for a fixed period of time. |
| Tolerated site/yard | Long-term tolerated sites or yards where enforcement action is not expedient, and a certificate of lawful use would be granted if sought. |
| Transit provision | Site intended for short stays and containing a range of facilities. There is normally a limit on the length of time residents can stay. |
| Unauthorised Development | Caravans on land owned by Gypsies and Travellers and without planning permission. |
| Unauthorised Encampment | Caravans on land not owned by Gypsies and Travellers and without planning permission. |
| Waiting list | Record held by the local authority or site managers of applications to live on a site. |
| Yard | A name often used by Travelling Showpeople to refer to a site. |

Appendix B: Need from Unknown Households

Adur District Council

Figure 59 – Additional need for unknown Gypsy and Traveller households in Adur 2018-2036

| Gypsies and Travellers - Unknown | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 2 |
| <i>(Formation from household demographics)</i> | |
| Total Future Needs | 2 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 2 |

Figure 60 – Additional need for unknown Gypsy and Traveller households in Adur by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 1 | 1 | 0 | 0 | 2 |

Figure 61 – Additional need for unknown Travelling Showpeople households in Adur 2018-2036

| Travelling Showpeople - Unknown | | Plots |
|---|--|--------------|
| Supply of Plots | | |
| Additional supply from vacant public and private plots | | 0 |
| Additional supply from plots on new yards | | 0 |
| Plots vacated by households moving to bricks and mortar | | 0 |
| Plots vacated by households moving away from the study area | | 0 |
| Total Supply | | 0 |
| Current Need | | |
| Households on unauthorised developments | | 0 |
| Households on unauthorised encampments | | 0 |
| Concealed households/Doubling-up/Over-crowding | | 0 |
| Movement from bricks and mortar | | 0 |
| Households on waiting lists for public yards | | 0 |
| Total Current Need | | 0 |
| Future Need | | |
| 5 year need from teenage children | | 0 |
| Households on yards with temporary planning permission | | 0 |
| In-migration | | 0 |
| New household formation | | 0 |
| <i>(No Travelling Showpeople)</i> | | |
| Total Future Needs | | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | | 0 |

Figure 62 – Additional need for unknown Travelling Showpeople households in Adur by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Arun District Council

Figure 63 – Additional need for unknown Gypsy and Traveller households in Arun 2018-2036

| Gypsies and Travellers - Unknown | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 1 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 2 |
| <i>(Household base 7 and formation rate 1.50%)</i> | |
| Total Future Needs | 3 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 3 |

Figure 64 – Additional need for unknown Gypsy and Traveller households in Arun by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 2 | 0 | 1 | 0 | 0 | 0 | 3 |

Figure 65 – Additional need for unknown Travelling Showpeople households in Arun – 2018-2036

| Travelling Showpeople - Unknown | Plots |
|---|--------------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 1 |
| <i>(Household base 4 and formation rate 1.00%)</i> | |
| Total Future Needs | 1 |
| Net Plot Need = (Current and Future Need – Total Supply) | 1 |

Figure 66 – Additional need for unknown Travelling Showpeople households in Arun by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 1 | 0 | 0 | 0 | 1 |

Chichester District Council

Figure 67 – Additional need for unknown Gypsy and Traveller households in Chichester - 2018-2036

| Gypsies and Travellers - Unknown | Pitches |
|--|-----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 3 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding ²⁹ | 2 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 5 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 23 |
| <i>(Household base 74 and formation rate 1.50%)</i> | |
| Total Future Needs | 23 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 28 |

Figure 68 – Additional need for unknown Gypsy and Traveller households in Chichester by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 11 | 6 | 7 | 1 | 1 | 2 | 28 |

²⁹ It was possible to obtain demographic information for one household that identified these 2 concealed/double-up households through a proxy interview but it was not possible to assess them against the planning definition.

Figure 69 – Additional need for unknown Travelling Showpeople households in Chichester – 2018-2036

| Travelling Showpeople - Unknown | | Plots |
|---|--|----------|
| Supply of Plots | | |
| Additional supply from vacant public and private plots | | 0 |
| Additional supply from plots on new yards | | 0 |
| Plots vacated by households moving to bricks and mortar | | 0 |
| Plots vacated by households moving away from the study area | | 0 |
| Total Supply | | 0 |
| Current Need | | |
| Households on unauthorised developments | | 1 |
| Households on unauthorised encampments | | 0 |
| Concealed households/Doubling-up/Over-crowding | | 0 |
| Movement from bricks and mortar | | 0 |
| Households on waiting lists for public yards | | 0 |
| Total Current Need | | 1 |
| Future Need | | |
| 5 year need from teenage children | | 0 |
| Households on yards with temporary planning permission | | 0 |
| In-migration | | 0 |
| New household formation | | 4 |
| <i>(Household base 20 and formation rate 1.00%)</i> | | |
| Total Future Needs | | 4 |
| Net Plot Need = (Current and Future Need – Total Supply) | | 5 |

Figure 70 – Additional need for unknown Travelling Showpeople households in Chichester by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 2 | 1 | 1 | 0 | 1 | 0 | 5 |

South Downs National Park (SDNP)

Figure 71 – Additional need for unknown Gypsy and Traveller households in SDNP (part) - 2018-2036

| Gypsies and Travellers - Unknown | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 2 |
| <i>(Household base 7 and formation rate 1.50%)</i> | |
| Total Future Needs | 2 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 2 |

Figure 72 – Additional need for unknown Gypsy and Traveller households in SDNP (part) by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------------------|----------|----------|----------|----------|----------|----------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| Adur | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arun | 1 | 0 | 1 | 0 | 0 | 0 | 2 |
| Chichester | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 1 | 0 | 1 | 0 | 0 | 0 | 2 |

Figure 73 – Additional need for unknown Travelling Showpeople households in SDNP (part) – 2018-2036

| Travelling Showpeople - Unknown | Plots |
|---|--------------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No unknown Travelling Showpeople)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 74 – Additional need for unknown Travelling Showpeople households in SDNP (part) by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------------------|----------|----------|----------|----------|----------|----------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| Adur | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arun | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Chichester | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Worthing Borough Council

Figure 75 – Additional need for unknown Gypsy and Traveller households in Worthing - 2018-2036

| Gypsies and Travellers - Unknown | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Gypsies or Travellers)</i> | |
| Total Future Needs | 0 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 0 |

Figure 76 – Additional need for unknown Gypsy and Traveller households in Worthing by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Figure 77 – Additional need for unknown Travelling Showpeople households in Worthing – 2018-2036

| Travelling Showpeople - Unknown | | Plots |
|---|--|--------------|
| Supply of Plots | | |
| Additional supply from vacant public and private plots | | 0 |
| Additional supply from plots on new yards | | 0 |
| Plots vacated by households moving to bricks and mortar | | 0 |
| Plots vacated by households moving away from the study area | | 0 |
| Total Supply | | 0 |
| Current Need | | |
| Households on unauthorised developments | | 0 |
| Households on unauthorised encampments | | 0 |
| Concealed households/Doubling-up/Over-crowding | | 0 |
| Movement from bricks and mortar | | 0 |
| Households on waiting lists for public yards | | 0 |
| Total Current Need | | 0 |
| Future Need | | |
| 5 year need from teenage children | | 0 |
| Households on yards with temporary planning permission | | 0 |
| In-migration | | 0 |
| New household formation | | 0 |
| <i>(No Travelling Showpeople)</i> | | |
| Total Future Needs | | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | | 0 |

Figure 78 – Additional need for unknown Travelling Showpeople households in Worthing by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Appendix C: Need from households not meeting Planning Definition

Adur District Council

Figure 79 – Additional need for Gypsy and Traveller households in Adur that did not meet the Planning Definition - 2018-2036

| Gypsies and Travellers - Not Meeting Planning Definition | Pitches |
|--|-----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 1 |
| Households on waiting lists for public sites | 7 |
| Total Current Need | 8 |
| Future Need | |
| 5 year need from teenage children | 2 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 7 |
| <i>(Household base 14 and formation rate 2.40%)</i> | |
| Total Future Needs | 9 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 17 |

Figure 80 – Additional need for Gypsy and Traveller households in Adur that did not meet the planning definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 12 | 2 | 2 | 0 | 1 | 0 | 17 |

Figure 81 – Additional need for Travelling Showpeople households in Adur that did not meet the Planning Definition - 2018-2036

| Travelling Showpeople - Not Meeting Planning Definition | Plots |
|---|----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Travelling Showpeople)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 82 – Additional need for Travelling Showpeople households in Adur that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Arun District Council

Figure 83 – Additional need for Gypsy and Traveller households in Arun that did not meet the Planning Definition – 2018-2036

| Gypsies and Travellers - Not Meeting Planning Definition | Pitches |
|--|----------------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 1 |
| Movement from bricks and mortar | 3 |
| Households on waiting lists for public sites | 2 |
| Total Current Need | 6 |
| Future Need | |
| 5 year need from teenage children | 1 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 6 |
| <i>(Household base 13 and formation rate 2.05%)</i> | |
| Total Future Needs | 7 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 13 |

Figure 84 – Additional need for Gypsy and Traveller households in Arun that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 8 | 2 | 2 | 0 | 0 | 1 | 13 |

Figure 85 – Additional need for Travelling Showpeople households in Arun that did not meet the Planning Definition - 2018-2036

| Travelling Showpeople - Not Meeting Planning Definition | Plots |
|---|----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No current or future need from 1 household)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 86 – Additional need for Travelling Showpeople households in Arun that did not meet the planning definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Chichester District Council

Figure 87 – Additional need for Gypsy and Traveller households in Chichester that did not meet the Planning Definition - 2018-2036

| Gypsies and Travellers - Not Meeting Planning Definition | Pitches |
|--|-----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 2 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 6 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 3 |
| Total Current Need | 11 |
| Future Need | |
| 5 year need from teenage children | 2 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 10 |
| <i>(Household base 40 and formation rate 1.25%)</i> | |
| Total Future Needs | 12 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 23 |

Figure 88 – Additional need for Gypsy and Traveller households in Chichester that did not meet the planning definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|-----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 15 | 3 | 3 | 1 | 0 | 1 | 23 |

Figure 89 – Additional need for Travelling Showpeople households in Chichester that did not meet the Planning Definition - 2018-2036

| Travelling Showpeople - Not Meeting Planning Definition | Plots |
|---|--------------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Travelling Showpeople that did not meet the Planning Definition)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 90 – Additional need for Travelling Showpeople households in Chichester that did not meet the planning definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

South Downs National Park (SDNP)

Figure 91 – Additional need for Gypsy and Traveller households in SDNP (part) that did not meet the Planning Definition - 2018-2036

| Gypsies and Travellers - Not Meeting Planning Definition | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 2 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No further new household formation)</i> | |
| Total Future Needs | 2 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 2 |

Figure 92 – Additional need for Gypsy and Traveller households in SDNP (part) that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------------------|----------|----------|----------|----------|----------|----------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| Adur | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arun | 2 | 0 | 0 | 0 | 0 | 0 | 2 |
| Chichester | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 2 | 0 | 0 | 0 | 0 | 0 | 2 |

Figure 93 – Additional need for Travelling Showpeople households in SDNP (part) that did not meet the Planning Definition – 2018-2036

| Travelling Showpeople - Not Meeting Planning Definition | Plots |
|---|----------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Travelling Showpeople that did not meet the Planning Definition)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 94 – Additional need for Travelling Showpeople households in SDNP (part) that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------------------|----------|----------|----------|----------|----------|----------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| Adur | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Arun | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Chichester | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Worthing | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| TOTAL | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Worthing Borough Council

Figure 95 – Additional need for Gypsy and Traveller households in Worthing that did not meet the Planning Definition – 2018-2036

| Gypsies and Travellers – Not Meeting Planning Definition | Pitches |
|--|----------|
| Supply of Pitches | |
| Additional supply from vacant public and private pitches | 0 |
| Additional supply from pitches on new sites | 0 |
| Pitches vacated by households moving to bricks and mortar | 0 |
| Pitches vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public sites | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on sites with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Gypsies or Travellers)</i> | |
| Total Future Needs | 0 |
| Net Pitch Need = (Current and Future Need – Total Supply) | 0 |

Figure 96 – Additional need for Gypsy and Traveller households in Worthing that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Figure 97 – Additional need for Travelling Showpeople households in Worthing that did not meet the Planning Definition – 2018-2036

| Travelling Showpeople – Not Meeting Planning Definition | Plots |
|---|--------------|
| Supply of Plots | |
| Additional supply from vacant public and private plots | 0 |
| Additional supply from plots on new yards | 0 |
| Plots vacated by households moving to bricks and mortar | 0 |
| Plots vacated by households moving away from the study area | 0 |
| Total Supply | 0 |
| Current Need | |
| Households on unauthorised developments | 0 |
| Households on unauthorised encampments | 0 |
| Concealed households/Doubling-up/Over-crowding | 0 |
| Movement from bricks and mortar | 0 |
| Households on waiting lists for public yards | 0 |
| Total Current Need | 0 |
| Future Need | |
| 5 year need from teenage children | 0 |
| Households on yards with temporary planning permission | 0 |
| In-migration | 0 |
| New household formation | 0 |
| <i>(No Travelling Showpeople)</i> | |
| Total Future Needs | 0 |
| Net Plot Need = (Current and Future Need – Total Supply) | 0 |

Figure 98 – Additional need for Travelling Showpeople households in Worthing that did not meet the Planning Definition by year periods

| Years | 0-5 | 6-10 | 11-15 | 16 | 17 | 18 | Total |
|-------|---------|---------|---------|---------|---------|---------|----------|
| | 2018-23 | 2023-28 | 2028-33 | 2033-34 | 2034-35 | 2035-36 | |
| | 0 | 0 | 0 | 0 | 0 | 0 | 0 |

Appendix D: Neighbouring Authority Interviews

Brighton and Hove City Council

With regard to **overall accommodation need** in Brighton and Hove, the views of the Officer interviewed were as follows:

- » Since the last GTAA was completed, the City Plan Part One Policy CP22 was adopted in March 2016 and the Horsdean Traveller Site opened in July of that year. Site search exercise undertaken jointly with SDNPA to try and identify sites to meet the additional need set out in Policy CP22 (unfortunately no suitable sites were identified).
- » The Horsdean site includes one permanent site (12 pitches), transit site (21 pitches) which is managed by the Gypsy Liaison Team in addition to managing unauthorised encampments. The permanent site has accommodated those that had been travelling around the area for years (often decades) and were residing intermittently on the transit site. There is still a waiting list (but isn't said to be large).
- » The transit site was extremely busy in the first year of opening, but since the autumn it has been quieter with approximately half a dozen families on there. In quieter times, the Council would look to direct any unauthorised encampments to the transit site. At this time of year, people do tend to ring and arrange a space. The Council would never keep places back. The numbers of unauthorised encampments have reduced significantly. A group of new Travellers who moves around the area makes up a large number of encampments, and the others are those passing through for employment opportunities or holidays as it is a very popular place.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » There are good links with East and West Sussex; the liaison officers meet every couple of months to discuss any issues, and also meet with the police.
- » There is effective communication around management of transit and if there is a family an area cannot accommodate then they will contact officers in the other areas to check if they can provide them with a place on their transit site.
- » An officer was aware that Lewes have not identified any additional sites in their Local Plan Part Two so there is likely to be an under-provision across an area wider than Brighton & Hove
- » Brighton & Hove have undertaken a joint site search exercise with South Downs National Park (although no sites were identified).
- » A lack of sites will mean this issue will continue to be relevant to Duty to Cooperate, however any joint work would be unlikely to result in unmet need being provided elsewhere as other neighbouring authorities also have insufficient sites.

Crawley Borough Council

With regard to **overall accommodation need** in Crawley, the views of the Officer interviewed were as follows:

- » There is a limited mix of temporary and permanent small family owned private sites in the north of the Borough, near the airport. Most of the Gypsies and Travellers in the borough live in Bricks and Mortar.
- » There is one private, single family unit site for Travelling Showpeople.
- » Numbers of short-term encampments are low; there were no encampments between 2006 and 2014, and eight in 2016. It is thought that due to small size and urban nature of the Borough Travellers are not attracted to the area as there are few suitable places to camp. The Borough also contributes to the Sussex county-wide transit site which is located in Chichester, thus in the event of an encampment the Travellers can be directed to this site.
- » Between 2012 and 2014 the Borough Council carried out a GTAA. The study did not identify any immediate need for Gypsies and Travellers. However, it did identify a potential need for an additional ten pitches for the children of families (i.e. new family formation) currently living in bricks and mortar, should they need a travelling lifestyle when forming their own new households³⁰ (due to the age profile of the Traveller's children this possible need was identified in years six to fifteen of the Local Plan). The Local Plan (December 2015), identified a reserve site for the potential future need of ten pitches.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » The Borough is surrounded by a number of Traveller sites which are located in neighbouring Boroughs: Reigate and Banstead has a site near the airport; there is a Showpeople's site in Tandridge; and Horsham have a site to their west.
- » In 2011, the Gatwick Diamond authorities (which include Crawley, Mid Sussex and Horsham, Tandridge, Reigate and Banstead, and Mole Valley) agreed to meet their own need for additional Traveller provision. The authorities regularly meet up to discuss Traveller issues and share information.
- » Within Crawley's Local Plan is a Duty to Cooperate statement which covers Gypsies and Travellers and states that joint working needs to be undertaken.

East Hampshire District Council

With regard to **overall accommodation need** in East Hampshire, the views of the Officer interviewed were as follows:

- » East Hampshire has recently updated its 2013 GTAA. The updated study, carried out by ORS, identifies a need for 26 pitches (including 10% unknowns) for gypsies and travellers, and 32 plots (including 70% unknown) for travelling showpeople in the District from 2017 to 2036.

³⁰ Just to note that the assessment and provision was undertaken on the basis of 'need' for accommodation including: "Bricks and mortar households whose existing accommodation is overcrowded or 'unsuitable'. Unsuitable in this context can include unsuitability by virtue of proven psychological aversion to bricks and mortar accommodation" (DCLG: Gypsy and Traveller Accommodation Needs Assessments Guidance, 2007, para 15).

- » The Council is in the process of carrying out a Local Plan Review. The updated GTAA provides part of the evidence base. The Local Plan Review will include a revised policy for gypsies, travellers and travelling showpeople, a safeguarding sites policy and site allocations.
- » In terms of meeting the current need for gypsies, travellers and travelling showpeople there is currently a shortfall.
- » The officer was aware of a few short-term roadside encampments but did not think it is a problem.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » Although there are no cross-border issues specifically, neighbouring authorities also have a shortfall of sites.
- » East Hampshire is represented on the Winchester City Council 'duty to cooperate' group in relation to gypsies, travellers and travelling showpeople. As part of the Local Plan Review the Council will be looking at setting up a strategic group made up of neighbouring authorities, under the 'duty to cooperate', to consider the need for gypsies, travellers and travelling showpeople.

Havant Borough Council

With regard to **overall accommodation need** in Havant, the views of the Officer interviewed were as follows:

- » ORS completed a GTAA in 2017 and identified a need for one pitch. Since that was completed a pitch was allowed on appeal, therefore meeting the need.
- » The Borough is currently developing its draft Local Plan.
- » The officer was not aware of any short-term encampments in the area.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » The Borough worked with other authorities in Hampshire on a combined GTAA and have regular Duty to Cooperate meetings with neighbouring authorities.

Horsham District Council

With regard to **overall accommodation need** in Horsham, the views of the Officer interviewed were as follows:

- » Horsham District Council (HDC) carried out its own in-house Gypsy and Traveller Accommodation Needs Assessment (GTANA) during the summer of 2016. This assessment identified a need for an additional 93 pitches throughout the District and included a backlog of 47 pitches. The backlog can be significantly reduced through the development of existing allocations in the adopted Development Plan (the Horsham District Planning Framework (HDPF)).
- » On the basis of the GTANA, HDC prepared a Preferred Strategy consultation document which was published in April 2017 and a further Preferred Strategy Document published in December 2017. These documents identified additional sites for G&T accommodation, sufficient enough to meet the 10-year requirement. Further details can be found on pages 15-16 of the December consultation document [here](#).

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/49124/Gypsy-and-Traveller-Site-Allocations-FINAL-27_11_17red.pdf

- » There are very limited options in terms of land availability in the Horsham District as the most sustainable development locations tend to have very high land values so are promoted / identified for bricks and mortar accommodation.
- » Local evidence shows that HDC do not have a need for Travelling Showpeople accommodation at the present time; however, the Council is keeping this under review by maintaining a dialogue between HDC officers and the Travelling community. HDC have a strong relationship with the travelling community in the Horsham District and a lot of the existing families are happy to talk to Officers, particularly compliance Officers, whenever information is needed.
- » HDC are aware there is a backlog of unauthorised but tolerated and personal permissions sites within the District and are seeking to make these authorised / tolerated through the new document or through the development management process (these sites are allocated in the HDPF in many instances, but no applications have been forthcoming).
- » HDC has a difficulty in identifying a need for Gypsy and Traveller families living in Bricks and Mortar accommodation as there is no specific question regarding this on the Housing Register questionnaire. This is something which is currently being investigated so that changes can be made. To resolve the issue the policy team are looking into what information we hold internally – particularly in the Compliance team who have a strong relationship with existing families in the G&T community.
- » Short-term encampments are not generally an issue within HDC as families tend to be fairly settled with travelling taking place from these bases. The number of unauthorised encampments has historically been low and has remained relatively static since the opening of the new transit site in the Chichester District (which is funded by all the west Sussex authorities). However, going forward, the District Council will continue to have dialogue with neighbouring authorities regarding this issue and address if required.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » Transit provision is the main cross border issue; however, Horsham District Council will continue to have dialogue with neighbouring authorities regarding this issue. The provision of unmet needs may also be a topic of conversation, but we have difficulty in finding sufficient available land to meet our own needs.
- » Horsham District work with its neighbouring West Sussex authorities and have also spoken to Reigate and Banstead regarding their plans.
- » Moving forward HDC will work to meet its required number of additional residential pitches within the district.
- » HDC struggle to find land to meet our own needs and can only identify a 10-year supply. Sites have fallen away as a result of the Preferred Strategy consultations and are finding it hard to identify sites that are suitable, available and achievable therefore it is very unlikely that HDC be able to provide land to meet other authority's needs.

Mid Sussex District Council

With regard to **overall accommodation need** in Mid Sussex, the views of the Officer interviewed were as follows:

- » Mid Sussex District Council completed a Gypsy and Traveller Accommodation Needs Assessment (GTAA) in 2016. This assessment identified a need for an additional 23 pitches in the district.
- » The authority is actively trying to bring forward a site that will provide four private pitches and 12 public pitches. These 16 pitches would meet a substantial amount of the need for culturally appropriate housing for those who did not meet the PPTS definition of 'Travelling' households (the GTAA assessment did not identify any need for those that meet the PPTS definition). A planning application was submitted but was subsequently withdrawn but is likely to be resubmitted in the future. Overall, it is felt that the Local Authority has taken positive steps to meet the identified need and is looking at options to meet the residual need through the allocation of further sites and expansion of existing sites

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » There have been no formal approaches from neighbouring authorities seeking assistance to provide permanent or transit sites under the Duty to Cooperate.
- » If there were a need to provide another transit site, the officer was sure that the local authorities would come together in the same way as they did to provide the existing site near Chichester.
- » There are regular policy officer group meetings and there are formal procedures in place to discuss cross boundary issues and the officer would expect authorities to also consult through the Local Plan process.
- » Moving forward Mid Sussex will work to meet its required number of additional residential pitches within the district.

Waverley Borough Council

With regard to **overall accommodation need** in Waverley, the views of the Officer interviewed were as follows:

- » In Waverley, there is one public site with planning permission for ten pitches; 15 private sites with full planning permission (105 pitches); and four Travelling Showpeople yards (13 plots); two of which are permanent and two are tolerated. There is also one private transit site with 15 pitches, and there are two unauthorised sites.
- » Waverley commissioned ORS to undertake a GTAA and fieldwork for the study was completed between March and April; the report was published in June 2017. The report identified a need for 27 additional pitches for Gypsy and Travellers and two additional plots for Travelling Showpeople between 2017-2032. In addition, the report highlighted the potential need arising from a group of Travelling Showpeople who purchased land in Cranleigh and have sought unsuccessfully to this date to get planning consent. Up to 26 households are claiming local connections and a need for additional plots to meet their needs. It is known that many of these households are now living on yards in other local authorities including Hounslow and

Tandridge. The officer explained that the Council are aware of this issue but are still in the process of developing a suitable way forward.

- » The officer explained that since the completion of the assessment the priority is now to identify sites to meet the need. The Council undertook a 'Call for Sites' in spring 2017, and this resulted in two sites which have now been put into the 'Issues and Options' consultation for discussion. Neither site has been assessed at this stage. However, these sites would not be enough to address the need identified in the GTAA, therefore, the Council will be undertaking further work to identify land. The Council are yet to determine how it will meet the accommodation needs of Travellers who do not meet the definition.
- » In terms of transit provision, the report recommends that whilst there are small numbers of unauthorised encampments in Waverley, the situation relating to levels of encampments should be continually monitored whilst any potential changes associated with PPTS (2015) develop. A review of the evidence base relating to unauthorised encampments, including the monitoring referred to above, should be undertaken in autumn 2018 once there is a new three-year evidence base following the changes to PPTS in 2015. This will establish whether there is a need for investment in any formal transit sites or emergency stopping places, or whether a managed approach is preferable. The Council are still considering its position in relation to managing short-term encampments.

With regard to the subject of **cross border issues and the Duty to Cooperate**, the views of the Officer interviewed were as follows:

- » The officer was not aware of any cross-border issues and explained that the results of the GTAA were shared with the neighbouring authorities and no issues were raised during this process.

Appendix E: Site and Yard Lists (January 2018)

Adur District Council

Figure 99 – Adur site and yard list

| Site/Yard | Authorised Pitches or Plots | Unauthorised Pitches or Plots |
|--|-----------------------------|-------------------------------|
| Public Sites | | |
| Withy Patch, Old Shoreham Road | 12 | 0 |
| Private Sites with Permanent Permission | | |
| None | - | - |
| Private Sites with Temporary Permission | | |
| None | - | - |
| Tolerated Sites – Long-term without Planning Permission | | |
| None | - | - |
| Unauthorised Developments | | |
| None | - | - |
| TOTAL PITCHES | 12 | 0 |
| Authorised Travelling Showpeople Yards | | |
| None | - | - |
| Unauthorised Travelling Showpeople Yards | | |
| None | - | - |
| TOTAL PLOTS | 0 | 0 |
| Transit Provision | | |
| None | - | - |

Arun District Council

Figure 100 – Arun site and yard list

| Site/Yard | Authorised Pitches or Plots | Unauthorised Pitches or Plots |
|--|-----------------------------|-------------------------------|
| Public Sites | | |
| Ryebank Caravan Park Yapton Road | 12 | - |
| Private Sites with Permanent Permission | | |
| 2 Wyndham Acres | 4 | - |
| Dragonfly | 1 | - |
| Fieldview, Junction Common Mead Land and Pagham Road | 3 | - |
| Land at Limmer Pond Stables | 1 | - |
| The Cottage Piggeries | 1 | - |
| The Old Stables | 2 | - |
| The Paddocks | 5 | - |
| Private Sites with Temporary Permission | | |
| None | - | - |
| Tolerated Sites – Long-term without Planning Permission | | |
| None | - | - |
| Unauthorised Developments | | |
| Castle View/The Paddocks, Rustington | - | 2 |
| TOTAL PITCHES | 29 | 2 |
| Authorised Travelling Showpeople Yards | | |
| Fairfield, Eastergate Lane | 1 | - |
| Land at Aldingbourne Farm Shop | 4 | - |
| Nyton Stables, Nyton Road | 8 | - |
| The Drive, Eastergate Lane | 5 | - |
| The Old Barns, Arundel Road | 2 | - |
| Unauthorised Travelling Showpeople Yards | | |
| None | - | - |
| TOTAL PLOTS | 20 | 0 |
| Transit Provision | | |
| None | - | - |

Chichester District Council

Figure 101 – Chichester site and yard list

| Site/Yard | Authorised Pitches or Plots | Unauthorised Pitches or Plots |
|---|-----------------------------|-------------------------------|
| Public Sites | | |
| Easthampnett Caravan Park | 23 | - |
| Westbourne Caravan Site | 17 | - |
| Private Sites with Permanent Permission | | |
| Bridgefoot Meadows, Glasshouse Lane | 1 | - |
| C & P Stables, Newells Lane | 1 | - |
| Clearwater, Ratham Lane | 3 | - |
| Connors, Scant Road | 3 | - |
| Cowdry Nursery | 1 | - |
| Five Oaks | 1 | - |
| Land adjacent to Westbourne Gypsy site | 2 | - |
| Land at Lakeside Barn, Hunston Road | 3 | - |
| Land east of Tower View Nursery | 4 | - |
| Land at Marsh Farm, Drove Lane | 3 | - |
| Land lying to the east of Nutbourne Park | 2 | - |
| Land North of Recreation Ground | 1 | - |
| Land South of Green Orchards | 5 | - |
| Land South of the Stables | 9 | - |
| Land West of Harwood | 5 | - |
| Land West of Hopedene, Westbourne | 12 | - |
| Littleacre, Keynor Lane | 6 | - |
| Longacre, Bracklesham Lane | 5 | - |
| Maytrees (Adjacent to Priors Leaze Bungalow) | 1 | - |
| Melita Nursery, Chalk Lane | 4 | - |
| Merston Pheantry (The Vardoe and Treetops), Bognor Road | 8 | - |
| Oaklands, Tower View Nursery | 3 | - |
| Plot B, Pond Farm | 1 | - |
| Plot J, Pond Farm | 1 | - |
| Pond Cottage, Plot A, Pond Farm | 1 | - |
| Sunrise (Adjacent to Southbourne Farm Shop), Main Road | 1 | - |
| The Hawthorns, Clayton Lane | 1 | - |
| The Stables, Bracklesham Lane | 1 | - |
| The Stables, Cemetery Lane, Westbourne | 1 | - |
| The Willows, Clayton Lane | 1 | - |
| Tommys Yard, Peckhams Copse Lane | 1 | - |
| Tower View Nursery (South) | 4 | - |
| Private Sites with Temporary Permission | | |
| 1 and 2 First Acre, Land to the south of Green Lane | 1 | - |
| Paddock View, Drift Lane | 1 | - |
| Plot C2 (The Three Horseshoes), Pond Farm | 1 | - |

| | | |
|---|------------|-----------|
| Plot C2A and C2B, Pond Farm | 2 | - |
| Plot F, Pond Farm | 1 | - |
| Robins Nest, Plot C, Pond Farm | 1 | - |
| Unauthorised Developments | | |
| Birdham Road Plots 1-11 | - | 11 |
| Birdham Road Plot 12 | - | 1 |
| Birdham Road Plot 14 | - | 1 |
| Birdham Road Plot 13 | - | 1 |
| Land adjacent to Ham Road, Sidlesham | - | 1 |
| The Orchard, Scant Road East | - | 1 |
| TOTAL PITCHES | 144 | 16 |
| Authorised Travelling Showpeople Yards | | |
| 1 Coneleys Yard, Jury Lane | 1 | |
| 2 Coneleys Yard (Fairhaven), Jury Lane | 1 | |
| 3 Coneleys Yard (Braes O Doon), Jury Lane | 1 | |
| Applegate, Priors Leaze Lane | 1 | |
| Coles Yard | 4 | |
| Five Paddock Farm, Bracklesham Bay | 1 | |
| Gateways, Kirdford Road | 1 | |
| Heathlands, Priors Leaze Lane | 1 | |
| Land south east of Tower View Nursery | 2 | |
| Land to rear of Fairways, Priors Leaze Lane | 6 | |
| Paddock Barn | 1 | |
| Paddock View, Priors Leaze Lane | 1 | |
| Plot 2, Fairways, Priors Leaze Lane | 1 | |
| Plot 2A, Hower Place, Priors Leaze Lane | 1 | |
| Plot 2B, Fairs End, Priors Leaze Lane | 1 | |
| Plot 2C, Dunromin, Priors Leaze Lane | 1 | |
| Plot 2C, Fair Acre, Priors Leaze Lane | 1 | |
| Plot 2C, London Corner, Priors Leaze Lane | 1 | |
| Plot 2C, Twin Oaks, Priors Leaze Lane | 1 | |
| Plot 4A, Scotland Yard, Priors Leaze Lane | 1 | |
| Plot 4C, Fairview, Priors Leaze Lane | 1 | |
| Plot 4D, Carousel, Priors Leaze Lane | 1 | |
| Showlands, Priors Leaze Lane | 1 | |
| The Old Army Camp, Westbourne | 4 | |
| The Woodlands, Westbourne | 1 | |
| Unauthorised Travelling Showpeople Yards | | |
| New Oak Farm, Priors Leaze Lane | - | 1 |
| TOTAL PLOTS | 26 | 1 |
| Transit Provision – public | | |
| Westhampnett Transit Site | 9 | - |
| Transit Provision – private | | |
| 2 Clearwater, Ratham Lane | 3 | - |
| Awaiting Planning Permission | | |

| | | |
|---|--|---|
| Land at 6 Oaklands | | 2 |
| Land at junction of Keynor Lane and Selsey Road | | 3 |
| Land north of Hawthorns and The Willows | | 1 |
| The Old Army Camp | | 2 |
| The Old Army Camp (TSP) | | 4 |

South Downs National Park (part)

Figure 102 – South Downs National Park (part) site and yard list

| Site/Yard | Authorised Pitches or Plots | Unauthorised Pitches or Plots |
|--|-----------------------------|-------------------------------|
| Public Sites | | |
| None | - | - |
| Private Sites with Permanent Permission | | |
| Coventry Plantation, Arun | 7 | - |
| Forest View Park, Arun | 12 | - |
| Holly Farm Stables, Chichester | 1 | - |
| Old Timbers, Arun | 1 | - |
| Savi Maski Granzi Stable, Arun | 1 | - |
| The Wood Yard, Arun | 1 | - |
| Three Cornered Piece, Chichester | 1 | - |
| Wychway Farm, Arun | 1 | - |
| Private Sites with Temporary Permission | | |
| None | - | - |
| Tolerated Sites – Long-term without Planning Permission | | |
| Titnore Lane, Worthing | - | 2 |
| Unauthorised Developments | | |
| None | - | - |
| TOTAL PITCHES | 25 | 2 |
| Authorised Travelling Showpeople Yards | | |
| Fairhaven, Arun | 1 | - |
| Unauthorised Travelling Showpeople Yards | | |
| None | - | - |
| TOTAL PLOTS | 1 | 0 |
| Transit Provision | | |
| None | - | - |

Worthing Borough Council

Figure 103 – Worthing site and yard list

| Site/Yard | Authorised Pitches or Plots | Unauthorised Pitches or Plots |
|--|-----------------------------|-------------------------------|
| Public Sites | | |
| None | - | - |
| Private Sites with Permanent Permission | | |
| None | - | - |
| Private Sites with Temporary Permission | | |
| None | - | - |
| Tolerated Sites – Long-term without Planning Permission | | |
| None | - | - |
| Unauthorised Developments | | |
| None | - | - |
| TOTAL PITCHES | 0 | 0 |
| Authorised Travelling Showpeople Yards | | |
| None | - | - |
| Unauthorised Travelling Showpeople Yards | | |
| None | - | - |
| TOTAL PLOTS | 0 | 0 |
| Transit Provision | | |
| None | - | - |

Appendix F: Household Interview Questions

NOT FOR CIRCULATION

GTAA Questionnaire 2017

INTERVIEWER: Good Morning/afternoon/evening. My name is < > from Opinion Research Services, working on behalf of XXXX Council.

The Council are undertaking a study of Gypsy, Traveller and Travelling Showpeople accommodation needs assessment in this area. This is needed to make sure that accommodation needs are properly assessed and to get a better understanding of the needs of the Travelling Community.

The Council need to try and speak with every Gypsy, Traveller and Travelling Showpeople household in the area to make sure that the assessment of need is accurate.

Your household will not be identified and all the information collected will be anonymous and will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households.

ORS is registered under the Data Protection Act 1998. Your responses will be stored and processed electronically and securely. This paper form will be securely destroyed after processing. Your household will not be identified to the council and only anonymous data and results will be submitted, though verbatim comments may be reported in full, and the data from this survey will only be used to help understand the needs of Gypsy, Traveller and Travelling Showpeople households

A General Information

A1 Name of planning authority:
INTERVIEWER please write in

A2 Date/time of site visit(s):
INTERVIEWER please write in

A3 Name of interviewer:
INTERVIEWER please write in

A4 Address and pitch number:
INTERVIEWER please write in

A5 Type of accommodation: *INTERVIEWER please cross one box only*

| | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Council | Private rented | Private owned | Unauthorised | Bricks and Mortar |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

A6 Name of Family:
INTERVIEWER please write in

A7 Ethnicity of Family:
INTERVIEWER please cross one box only

| | | | |
|---|--------------------------|--------------------------|--------------------------|
| Romany Gypsy | Irish Traveller | Scots Gypsy or Traveller | Show Person |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| New Traveller | English Traveller | Welsh Gypsy | Non-Traveller |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other (please specify) <input type="text"/> | | | |

A8 Number of units on the pitch:
INTERVIEWER please write in

| | | | |
|----------------------|----------------------|----------------------|------------------------|
| Mobile homes | Touring Caravans | Day Rooms | Other (please specify) |
| <input type="text"/> | <input type="text"/> | <input type="text"/> | <input type="text"/> |

NOT FOR CIRCULATION

A9 Is this site your main place of residence? If not where is?

INTERVIEWER: Please cross one box only

Yes

No

If not main place of residence where is (please specify)

A10 How long have you lived here? If you have moved in the past 5 years, where did you move from? INTERVIEWER: Please write in below

| | | |
|-------|--------|---|
| Years | Months | If you have moved in the past 5 years, where did you move from? Include ALL moves |
|-------|--------|---|

A11 Did you live here out of your own choice or because there was no other option? If there was no other option, why? INTERVIEWER: Please cross one box only

Choice

No option

If no option, why?

A12 Is this site suitable for your household? If so why and if not why not? (For example close to schools, work, healthcare, family and friends etc.)

INTERVIEWER: Please cross one box only

Yes

No

Reasons (please specify)

A13 How many separate families or unmarried adults live on this pitch?

INTERVIEWER: Please cross one box only

1

2

3

4

5

6

7

8

9

10

B Demographics

B1 Demographics — Household 1 INTERVIEWER: Please write-in

| Person 1 | | Person 2 | | Person 3 | |
|----------|-----|----------|-----|----------|-----|
| Sex | Age | Sex | Age | Sex | Age |

Complete additional forms for each household on pitch INTERVIEWER: Please write-in

| Person 4 | | Person 5 | | Person 6 | | Person 7 | | Person 8 | |
|----------|-----|----------|-----|----------|-----|----------|-----|----------|-----|
| Sex | Age | Sex | Age | Sex | Age | Sex | Age | Sex | Age |

C Accommodation Needs

C1 How many families or unmarried adults living on this pitch are in need of a pitch of their own in the next 5 years? INTERVIEWER: Please cross one box only

INTERVIEWER: AN ADULT IS DEFINED AS 16+

1

2

3

4

5

6

7

8

9

10

Other Please specify

NOT FOR CIRCULATION

C2 How many of your children will need a home of their own in the next 5 years? If they live here now, will they want to stay on this site? If not, where would they wish to move? (e.g. other site, in bricks and mortar etc.) If they do not live on this site, where do they currently live and would they want to move on to this site or another local site if they could get a pitch? *INTERVIEWER: Please cross one box only*

| | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Other *Please specify*

Details *(Please specify)*

D Waiting List

D1 Is anyone living here on the waiting list for a pitch in this area?

INTERVIEWER: Please cross one box only

| | | | |
|-----|--------------------------|---|----------------|
| Yes | <input type="checkbox"/> | → | Continue to D2 |
| No | <input type="checkbox"/> | → | Go to D4 |

D2 How many people living here are on the waiting list for a pitch in this area?

INTERVIEWER: Please cross one box only

| | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Other *(Please specify)*

Details *(Please specify)*

D3 How long have they been on the waiting list? *INTERVIEWER: Please cross one box only*

| | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 0-3 months | 3-6 months | 6-12 months | 1-2 years | 2+ years |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Other *(Please specify)*

Details *(Please specify)*

D4 If they are not on the waiting list, do any of the people living here want to be on the waiting list? (*INTERVIEWER* if they do - please take their contact details)

INTERVIEWER: Please cross one box only

| | | | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

No

Other *(Please specify)*

Details *(Please specify)* and take contact details

NOT FOR CIRCULATION

E
Future Accommodation Needs

E1 Do you plan to move from this site in the next 5 years? If so, why?
INTERVIEWER: Please cross one box only

Yes If yes → Continue to E2
 No If no → Go to E5

If so, why? (please specify)

E2 Where would you move to? *INTERVIEWER: Please cross one box only*

| | | | | |
|---|--|--|---|---|
| Another site in this area <i>(specify where)</i> | A site in another council area <i>(specify where)</i> | Bricks and mortar in this area <i>(specify where)</i> | Bricks and mortar in another council area <i>(specify where)</i> | Other (e.g. land they own elsewhere) <i>(Please specify)</i> |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Please specify where they would move to
 If they own land elsewhere - probe for details

E3 If you want to move would you prefer to buy a private pitch or site, or rent a pitch on a public or private site? *INTERVIEWER: Please cross one box only*

| | | |
|--------------------------|--------------------------|--------------------------|
| Private buy | Private rent | Public rent |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

E4 Can you afford to buy a private pitch or site? *INTERVIEWER: Please cross one box only*

| | |
|--------------------------|--------------------------|
| Yes | No |
| <input type="checkbox"/> | <input type="checkbox"/> |

E5 Are you aware of, or do you own any land that could have potential for new pitches? *INTERVIEWER: Please cross one box only*

| | |
|--------------------------|--------------------------|
| Yes | No |
| <input type="checkbox"/> | <input type="checkbox"/> |

Please ask for details on where land/site is located and who owns the land/site?

NOT FOR CIRCULATION

F
Travelling

F1 How many trips, living in a caravan or trailer, have you or members of your family made away from your permanent base in the last 12 months?
INTERVIEWER: Please cross one box only

0 1 2 3 4 5+

↓
Go to F6a
Continue to F2

F2 If you or members of your family have travelled in the last 12 months, which family members travelled?
INTERVIEWER: Please cross one box only

All the family Adult males Other

F3 What were the reasons for travelling?
INTERVIEWER: Please cross all that apply

Work Holidays Visiting family Fairs Other

Details / specify if necessary. If fairs—probe for whether this involves work

F4 At what time of year do you or family members usually travel? And for how long?
INTERVIEWER: Please cross one box only

All year Summer Winter

And for how long?

F5 Where do you or family members usually stay when they are travelling?
INTERVIEWER: Please cross all boxes that apply

LA transit sites Private transit sites Roadside Friends/family Other

INTERVIEWER: Ask F6a — F8 ONLY if F1 = 0. Otherwise, go to F9

F6a Are there any reasons why you don't you travel at the moment?
Details

F6b Have you or family members ever travelled?
INTERVIEWER: Please cross one box only

Yes —————> Continue to F7
 No —————> Go to F9

F7a When did you or family members last travel?
INTERVIEWER: Please write in

Details

F7b What were the reasons for travelling?
INTERVIEWER: Please cross all that apply

Work Holidays Visiting family Fairs Other

Details / specify if necessary. If fairs—probe for whether this involves work

NOT FOR CIRCULATION

F8 Why do you not travel anymore? *INTERVIEWER: Cross all boxes that apply & probe for details*

- | | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Children in school | Ill health | Old age | Settled now | Nowhere to stop | No work opportunities | Other |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If other, please specify

Details about children in school, types of ill health, or looking after relative with poor health, and specific problems/issues relating to old age

F9 Do you or other family members plan to travel in the future?

INTERVIEWER: Please cross one box only

- | | | | |
|------------|--------------------------|---|------------------------|
| Yes | <input type="checkbox"/> | → | <i>Continue to F10</i> |
| No | <input type="checkbox"/> | → | <i>Go to G1</i> |
| Don't know | <input type="checkbox"/> | → | <i>Go to G1</i> |

F10 When, and for what purpose do you/they plan to travel?

Details

F11 Is there anything else you would like to tell us about your travelling patterns?

Details

NOT FOR CIRCULATION

G

Any other information

G1 Any other information about this site or your accommodation needs? INTERVIEWER:
Please write in

Details (e.g. can current and future needs be met by expanding or intensifying the existing site?)

G2 Site/Pitch plan? Any concerns? INTERVIEWER: Please sketch & write in

Sketch of Site/Pitch — any concerns?

Are any adaptations needed?

Why does the current accommodation not meet the household's needs; and could their needs could be addressed in situ e.g. extra caravans. This could cover people wanting to live with that household but who cannot currently

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NOT FOR CIRCULATION

| | |
|---|---|
| H | Bricks & Mortar Contacts |
| H1 Contacts for Bricks and Mortar interviews? <i>INTERVIEWER: Please write in</i> | |
| <div style="border: 1px solid black; width: 100%; height: 100%; display: flex; align-items: center; justify-content: center;"> <p>Details</p> </div> | |
| Council contact? | |
| <p>Would you like the council to contact you about any of the issues raised in this interview? Please note that although ORS will pass on your contact details to the Council we cannot guarantee when they will contact you?</p> <p><i>INTERVIEWER: Please cross one box only</i></p> | |
| <p>Yes</p> <input type="checkbox"/> | <p>No</p> <input type="checkbox"/> |
| <p><i>INTERVIEWER: Can I confirm your name and telephone number so that we can pass them on to the Council for this purpose only. Your details will only be used for this purpose and will not be passed onto anyone else.</i></p> | |
| Respondent's Name..... | <input style="width: 100%;" type="text"/> |
| Respondent's Telephone..... | <input style="width: 100%;" type="text"/> |
| Respondent's Email..... | <input style="width: 100%;" type="text"/> |
| Interview log | |
| <i>INTERVIEWER: Please record the date and time that the interview was carried out</i> | |
| Date..... | <input style="width: 100%;" type="text"/> |
| Time of interview..... | <input style="width: 100%;" type="text"/> |

Appendix G: ORS Technical Note



Opinion Research Services

Technical Note

Gypsy and Traveller Household Formation and Growth Rates

August 26th 2015

Opinion Research Services
Spin-out company of Swansea University



As with all our studies, this research is subject to Opinion Research Services' Standard Terms and Conditions of Contract.

Any press release or publication of this research requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

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Household Growth Rates

Abstract and conclusions

1. National and local household formation and growth rates are important components of Gypsy and Traveller accommodation assessments, but little detailed work has been done to assess their likely scale. Nonetheless, nationally, a net growth rate of 3% per annum has been commonly assumed and widely used in local assessments – even though there is actually no statistical evidence of households growing so quickly. The result has been to inflate both national and local requirements for additional pitches unrealistically.
2. Those seeking to provide evidence of high annual net household growth rates for Gypsies and Travellers have sometimes sought to rely on increases in the number of caravans, as reflected in caravan counts. However, caravan count data are unreliable and erratic – so the only proper way to project future population and household growth is through demographic analysis (which, of course, is used to assess housing needs in the settled community).
3. The growth in the Gypsy and Traveller population may be as low as 1.25% per annum – a rate which is much less than the 3% per annum often assumed, but still at least four times greater than in the general population. Even using extreme and unrealistic assumptions, it is hard to find evidence that net Gypsy and Traveller population and household growth rates are above 2% per annum nationally.
4. The often assumed 3% per annum net household growth rate is unrealistic and would require clear statistical evidence before being used for planning purposes. In practice, the best available evidence supports a national net household growth rate of 1.5% per annum for Gypsies and Travellers.
5. Some local authorities might perhaps allow for a household growth rate of up to 2.5% per annum, to provide a ‘margin’ if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller communities, the lower estimate of 1.5% per annum should be used for planning purposes.

Introduction

6. The rate of household growth is a key element in all housing assessments, including Gypsy and Traveller accommodation assessments. Compared with the general population, the relative youthfulness of many Gypsy and Traveller populations means that their birth rates are likely to generate higher-than-average population growth, and proportionately higher *gross* household formation rates. However, while their *gross* rate of household growth might be high, Gypsy and Traveller communities’ future accommodation needs are, in practice, affected by any reduction in the number of households due to dissolution and/or by movements in/out of the area and/or by transfers into other forms of housing. Therefore, the *net* rate of household growth is the *gross* rate of formation *minus* any reductions in households due to such factors. Of course, it is the *net* rate that is important in determining future accommodation needs for Gypsies and Travellers.

7. In this context, it is a matter of concern that many Gypsy and Traveller accommodation needs assessments have not distinguished *gross* and *net* growth rates nor provided evidence for their assumed rates of household increase. These deficiencies are particularly important because when assumed growth rates are unrealistically high, and then compounded over a number of planning years, they can yield exaggerated projections of accommodation needs and misdirect public policy. Nonetheless, assessments and guidance documents have assumed 'standard' *net* growth rates of about 3% without sufficiently recognising either the range of factors impacting on the *gross* household growth rates or the implications of unrealistic assumptions when projected forward on a compound basis year by year.
8. For example, in a study for the Office of the Deputy Prime Minister ('Local Authority Gypsy and Traveller Sites in England', 2003), Pat Niner concluded that *net* growth rates as high as 2%-3% per annum should be assumed. Similarly, the Regional Spatial Strategies (RSS) (which continued to be quoted after their abolition was announced in 2010) used *net* growth rates of 3% per annum without providing any evidence to justify the figure (For example, 'Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England: A Revision to the Regional Spatial Strategy for the East of England July 2009').
9. However, the guidance of the Department of Communities and Local Government ('Gypsy and Traveller Accommodation Needs Assessments: Guidance', 2007) was much clearer in saying that:

The 3% family formation growth rate is used here as an example only. The appropriate rate for individual assessments will depend on the details identified in the local survey, information from agencies working directly with local Gypsy and Traveller communities, and trends identified from figures previously given for the caravan count. [In footnote 6, page 25]

10. The guidance emphasises that local information and trends should always be taken into account – because the *gross* rate of household growth is moderated by reductions in households through dissolution and/or by households moving into bricks and mortar housing or moving to other areas. In other words, even if 3% is plausible as a *gross* growth rate, it is subject to moderation through such reductions in households through dissolution or moves. It is the resulting *net* household growth rate that matters for planning purposes in assessing future accommodation needs.
11. The current guidance also recognises that assessments should use local evidence for *net* future household growth rates. A letter from the Minister for Communities and Local Government (Brandon Lewis MP), to Andrew Selous MP (placed in the House of Commons library on March 26th 2014) said:

I can confirm that the annual growth rate figure of 3% does not represent national planning policy.

The previous Administration's guidance for local authorities on carrying out Gypsy and Traveller Accommodation Assessments under the Housing Act 2004 is unhelpful in that it uses an illustrative example of calculating future accommodation need based on the 3% growth rate figure. The guidance notes that the appropriate rate for individual assessments will depend on the details identified in the local authority's own assessment of need. As such the Government is not endorsing or supporting the 3% growth rate figure.'

12. Therefore, while there are many assessments where a national Gypsy and Traveller household growth rate of 3% per annum has been assumed (on the basis of 'standard' precedent and/or guidance), there is little to justify this position and it conflicts with current planning guidance. In this context, this document seeks to integrate available evidence about *net* household growth rates in order to provide a more robust basis for future assessments.

Compound growth

13. The assumed rate of household growth is crucially important for Gypsy and Traveller studies because for future planning purposes it is projected over time on a compound basis – so errors are progressively enlarged. For example, if an assumed 3% *net* growth rate is compounded each year then the implication is that the number of households will double in only 23.5 years; whereas if a *net* compound rate of 1.5% is used then the doubling of household numbers would take 46.5 years. The table below shows the impact of a range of compound growth rates.

Table 1
Compound Growth Rates and Time Taken for Number of Households to Double

| Household Growth Rate per Annum | Time Taken for Household to Double |
|---------------------------------|------------------------------------|
| 3.00% | 23.5 years |
| 2.75% | 25.5 years |
| 2.50% | 28 years |
| 2.25% | 31 years |
| 2.00% | 35 years |
| 1.75% | 40 years |
| 1.50% | 46.5 years |

14. The above analysis is vivid enough, but another illustration of how different rates of household growth impact on total numbers over time is shown in the table below – which uses a baseline of 100 households while applying different compound growth rates over time. After 5 years, the difference between a 1.5% growth rate and a 3% growth rate is only 8 households (116 minus 108); but with a 20-year projection the difference is 46 households (181 minus 135).

Table 2
Growth in Households Over time from a Baseline of 100 Households

| Household Growth Rate per Annum | 5 years | 10 years | 15 years | 20 years | 50 years | 100 years |
|---------------------------------|---------|----------|----------|----------|----------|-----------|
| 3.00% | 116 | 134 | 156 | 181 | 438 | 1,922 |
| 2.75% | 115 | 131 | 150 | 172 | 388 | 1,507 |
| 2.50% | 113 | 128 | 145 | 164 | 344 | 1,181 |
| 2.25% | 112 | 125 | 140 | 156 | 304 | 925 |
| 2.00% | 110 | 122 | 135 | 149 | 269 | 724 |
| 1.75% | 109 | 119 | 130 | 141 | 238 | 567 |
| 1.50% | 108 | 116 | 125 | 135 | 211 | 443 |

15. In summary, the assumed rate of household growth is crucially important because any exaggerations are magnified when the rate is projected over time on a compound basis. As we have shown, when compounded and projected over the years, a 3% annual rate of household growth implies much larger future Gypsy and Traveller accommodation requirements than a 1.5% per annum rate.

Caravan counts

16. Those seeking to demonstrate national Gypsy and Traveller household growth rates of 3% or more per annum have, in some cases, relied on increases in the number of caravans (as reflected in caravan counts) as their evidence. For example, some planning agents have suggested using 5-year trends in the national caravan count as an indication of the general rate of Gypsy and Traveller household growth. For example, the count from July 2008 to July 2013 shows a growth of 19% in the number of caravans on-site – which is equivalent to an average annual compound growth rate of 3.5%. So, *if plausible*, this approach could justify using a 3% or higher annual household growth rate in projections of future needs.
17. However, caravan count data are unreliable and erratic. For example, the July 2013 caravan count was distorted by the inclusion of 1,000 caravans (5% of the total in England) recorded at a Christian event near Weston-Super-Mare in North Somerset. Not only was this only an estimated number, but there were no checks carried out to establish how many caravans were occupied by Gypsies and Travellers. Therefore, the resulting count overstates the Gypsy and Traveller population and also the rate of household growth.
18. ORS has applied the caravan-counting methodology hypothetically to calculate the implied national household growth rates for Gypsies and Travellers over the last 15 years, and the outcomes are shown in the table below. The January 2013 count suggests an average annual growth rate of 1.6% over five years, while the July 2013 count gives an average 5-year rate of 3.5%; likewise a study benchmarked at January 2004 would yield a growth rate of 1%, while one benchmarked at January 2008 would imply a 5% rate of growth. Clearly any model as erratic as this is not appropriate for future planning.

Table 3
National CLG Caravan Count July 1998 to July 2014 with Growth Rates (Source: CLG)

| Date | Number of caravans | 5 year growth in caravans | Percentage growth over 5 years | Annual over last 5 years. |
|-----------|--------------------|---------------------------|--------------------------------|---------------------------|
| Jan 2015 | 20,123 | 1,735 | 9.54% | 1.84% |
| July 2014 | 20,035 | 2,598 | 14.90% | 2.81% |
| Jan 2014 | 19,503 | 1,638 | 9.17% | 1.77% |
| July 2013 | 20,911 | 3,339 | 19.00% | 3.54% |
| Jan 2013 | 19,359 | 1,515 | 8.49% | 1.64% |
| Jul 2012 | 19,261 | 2,112 | 12.32% | 2.35% |
| Jan 2012 | 18,746 | 2,135 | 12.85% | 2.45% |
| Jul 2011 | 18,571 | 2,258 | 13.84% | 2.63% |
| Jan 2011 | 18,383 | 2,637 | 16.75% | 3.15% |
| Jul 2010 | 18,134 | 2,271 | 14.32% | 2.71% |
| Jan 2010 | 18,370 | 3,001 | 19.53% | 3.63% |
| Jul 2009 | 17,437 | 2,318 | 15.33% | 2.89% |
| Jan 2009 | 17,865 | 3,503 | 24.39% | 4.46% |
| Jul 2008 | 17,572 | 2,872 | 19.54% | 3.63% |
| Jan 2008 | 17,844 | 3,895 | 27.92% | 5.05% |

| | | | | |
|-----------------|--------|-------|--------|-------|
| Jul 2007 | 17,149 | 2,948 | 20.76% | 3.84% |
| Jan 2007 | 16,611 | 2,893 | 21.09% | 3.90% |
| Jul 2006 | 16,313 | 2,511 | 18.19% | 3.40% |
| Jan 2006 | 15,746 | 2,352 | 17.56% | 3.29% |
| Jul 2005 | 15,863 | 2,098 | 15.24% | 2.88% |
| Jan 2005 | 15,369 | 1,970 | 14.70% | 2.78% |
| Jul 2004 | 15,119 | 2,110 | 16.22% | 3.05% |
| Jan 2004 | 14,362 | 817 | 6.03% | 1.18% |
| Jul 2003 | 14,700 | | | |
| Jan 2003 | 13,949 | | | |
| Jul 2002 | 14,201 | | | |
| Jan 2002 | 13,718 | | | |
| Jul 2001 | 13,802 | | | |
| Jan 2001 | 13,394 | | | |
| Jul 2000 | 13,765 | | | |
| Jan 2000 | 13,399 | | | |
| Jan 1999 | 13,009 | | | |
| Jul 1998 | 13,545 | | | |

19. The annual rate of growth in the number of caravans varies from slightly over 1% to just over 5% per annum. We would note that if longer time periods are used the figures do become more stable. Over the 36 year period 1979 (the start of the caravan counts) to 2015 the compound growth rate in caravan numbers has been 2.5% per annum.
20. However, there is no reason to assume that these widely varying rates correspond with similar rates of increase in the household population. In fact, the highest rates of caravan growth occurred between 2006 and 2009, when the first wave of Gypsy and Traveller accommodation needs assessments were being undertaken – so it seems plausible that the assessments prompted the inclusion of additional sites and caravans (which may have been there, but not counted previously). Counting caravan numbers is very poor proxy for Gypsy and Traveller household growth. Caravans counted are not always occupied by Gypsy and Traveller families and numbers of caravans held by families may increase generally as affluence and economic conditions improve, (but without a growth in households)
21. There is no reason to believe that the varying rates of increase in the number of caravans are matched by similar growth rates in the household population. The caravan count is not an appropriate planning guide and the only proper way to project future population and household growth is through demographic analysis – which should consider both population and household growth rates. This approach is not appropriate to needs studies for the following reasons:

Modelling population growth

Introduction

22. The basic equation for calculating the rate of Gypsy and Traveller population growth seems simple: start with the base population and then calculate the average increase/decrease by allowing for births, deaths and in-/out-migration. Nevertheless, deriving satisfactory estimates is difficult because the evidence is often tenuous – so, in this context, ORS has modelled the growth of the national Gypsy and Traveller population based on the most likely birth and death rates, and by using PopGroup (the leading software for

population and household forecasting). To do so, we have supplemented the available national statistical sources with data derived locally (from our own surveys) and in some cases from international research. None of the supplementary data are beyond question, and none will stand alone; but, when taken together they have cumulative force. In any case the approach we adopt is more critically self-aware than simply adopting 'standard' rates on the basis of precedent.

Migration effects

23. Population growth is affected by national net migration and local migration (as Gypsies and Travellers move from one area to another). In terms of national migration, the population of Gypsies and Travellers is relatively fixed, with little international migration. It is in principle possible for Irish Travellers (based in Ireland) to move to the UK, but there is no evidence of this happening to a significant extent and the vast majority of Irish Travellers were born in the UK or are long-term residents. In relation to local migration effects, Gypsies and Travellers can and do move between local authorities – but in each case the in-migration to one area is matched by an out-migration from another area. Since it is difficult to estimate the net effect of such movements over local plan periods, ORS normally assumes that there will be nil net migration to/from an area. Nonetheless, where it is possible to estimate specific in-/out- migration effects, we take account of them, while distinguishing between migration and household formation effects.

Population profile

24. The main source for the rate of Gypsy and Traveller population growth is the UK 2011 Census. In some cases the data can be supplemented by ORS's own household survey data which is derived from more than 2,000 face-to-face interviews with Gypsies and Travellers since 2012. The ethnicity question in the 2011 census included for the first time 'Gypsy and Irish Traveller' as a specific category. While non-response bias probably means that the size of the population was underestimated, the age profile the census provides is not necessarily distorted and matches the profile derived from ORS's extensive household surveys.
25. The age profile is important, as the table below (derived from census data) shows. Even assuming zero deaths in the population, achieving an annual population growth of 3% (that is, doubling in size every 23.5 years) would require half of the "year one" population to be aged under 23.5 years. When deaths are accounted for (at a rate of 0.5% per annum), to achieve the same rate of growth, a population of Gypsies and Travellers would need about half its members to be aged under 16 years. In fact, though, the 2011 census shows that the midway age point for the national Gypsy and Traveller population is 26 years – so the population could not possibly double in 23.5 years.

Table 4

Age Profile for the Gypsy and Traveller Community in England (Source: UK Census of Population 2011)

| Age Group | Number of People | Cumulative Percentage |
|--------------|------------------|-----------------------|
| Age 0 to 4 | 5,725 | 10.4 |
| Age 5 to 7 | 3,219 | 16.3 |
| Age 8 to 9 | 2,006 | 19.9 |
| Age 10 to 14 | 5,431 | 29.8 |
| Age 15 | 1,089 | 31.8 |
| Age 16 to 17 | 2,145 | 35.7 |
| Age 18 to 19 | 1,750 | 38.9 |

| | | |
|-----------------|-------|-------|
| Age 20 to 24 | 4,464 | 47.1 |
| Age 25 to 29 | 4,189 | 54.7 |
| Age 30 to 34 | 3,833 | 61.7 |
| Age 35 to 39 | 3,779 | 68.5 |
| Age 40 to 44 | 3,828 | 75.5 |
| Age 45 to 49 | 3,547 | 82.0 |
| Age 50 to 54 | 2,811 | 87.1 |
| Age 55 to 59 | 2,074 | 90.9 |
| Age 60 to 64 | 1,758 | 94.1 |
| Age 65 to 69 | 1,215 | 96.3 |
| Age 70 to 74 | 905 | 97.9 |
| Age 75 to 79 | 594 | 99.0 |
| Age 80 to 84 | 303 | 99.6 |
| Age 85 and over | 230 | 100.0 |

Birth and fertility rates

26. The table above provides a way of understanding the rate of population growth through births. The table shows that surviving children aged 0-4 years comprise 10.4% of the Gypsy and Traveller population – which means that, on average, 2.1% of the total population was born each year (over the last 5 years). The same estimate is confirmed if we consider that those aged 0-14 comprise 29.8% of the Gypsy and Traveller population – which also means that almost exactly 2% of the population was born each year. (Deaths during infancy will have minimal impact within the early age groups, so the data provides the best basis for estimating of the birth rate for the Gypsy and Traveller population.)
27. The total fertility rate (TFR) for the whole UK population is just below 2 – which means that on average each woman can be expected to have just less than two children who reach adulthood. We know of only one estimate of the fertility rates of the UK Gypsy and Traveller community. This is contained in the book, ‘Ethnic identity and inequalities in Britain: The dynamics of diversity’ by Dr Stephen Jivraj and Professor Ludi Simpson published in May 2015. This draws on the 2011 Census data and provides an estimated total fertility rate of 2.75 for the Gypsy and traveller community
28. ORS’s have been able to examine our own survey data to investigate the fertility rate of Gypsy and Traveller women. The ORS data shows that, on average, Gypsy and Traveller women aged 32 years have 2.5 children (but, because the children of mothers above this age point tend to leave home progressively, full TFRs were not completed). On this basis it is reasonable to assume an average of three children per woman during her lifetime which would be consistent with the evidence from the 2011 Census of a figure of around 2.75 children per woman. In any case, the TFR for women aged 24 years is 1.5 children, which is significantly short of the number needed to double the population in 23.5 years – and therefore certainly implies a net growth rate of less than 3% per annum.

Death rates

29. Although the above data imply an annual growth rate through births of about 2%, the death rate has also to be taken into account – which means that the *net* population growth cannot conceivably achieve 2% per

annum. In England and Wales there are nearly half-a-million deaths each year – about 0.85% of the total population of 56.1 million in 2011. If this death rate is applied to the Gypsy and Traveller community then the resulting projected growth rate is in the region of 1.15%-1.25% per annum.

30. However, the Gypsy and Traveller population is significantly younger than average and may be expected to have a lower percentage death rate overall (even though a smaller than average proportion of the population lives beyond 68 to 70 years). While there can be no certainty, an assumed death rate of around 0.5% to 0.6% per annum would imply a net population growth rate of around 1.5% per annum.
31. Even though the population is younger and has a lower death rate than average, Gypsies and Travellers are less likely than average to live beyond 68 to 70 years. Whereas the average life expectancy across the whole population of the UK is currently just over 80 years, a Sheffield University study found that Gypsy and Traveller life expectancy is about 10-12 years less than average (Parry et al (2004) 'The Health Status of Gypsies and Travellers: Report of Department of Health Inequalities in Health Research Initiative', University of Sheffield). Therefore, in our population growth modelling we have used a conservative estimate of average life expectancy as 72 years – which is entirely consistent with the lower-than-average number of Gypsies and Travellers aged over 70 years in the 2011 census (and also in ORS's own survey data). On the basis of the Sheffield study, we could have supposed a life expectancy of only 68, but we have been cautious in our approach.

Modelling outputs

32. If we assume a TFR of 3 and an average life expectancy of 72 years for Gypsies and Travellers, then the modelling projects the population to increase by 66% over the next 40 years – implying a population compound growth rate of 1.25% per annum (well below the 3% per annum often assumed). If we assume that Gypsy and Traveller life expectancy increases to 77 years by 2050, then the projected population growth rate rises to nearly 1.5% per annum. To generate an 'upper range' rate of population growth, we have assumed a TFR of 4 and an average life expectancy rising to 77 over the next 40 years – which then yields an 'upper range' growth rate of 1.9% per annum. We should note, though, that national TFR rates of 4 are currently found only in sub-Saharan Africa and Afghanistan, so it is an implausible assumption.
33. There are indications that these modelling outputs are well founded. For example, in the ONS's 2012-based Sub-National Population Projections the projected population growth rate for England to 2037 is 0.6% per annum, of which 60% is due to natural change and 40% due to migration. Therefore, the natural population growth rate for England is almost exactly 0.35% per annum – meaning that our estimate of the Gypsy and Traveller population growth rate is four times greater than that of the general population of England.
34. The ORS Gypsy and Traveller findings are also supported by data for comparable populations around the world. As noted, on the basis of sophisticated analysis, Hungary is planning for its Roma population to grow at around 2.0% per annum, but the underlying demographic growth is typically closer to 1.5% per annum. The World Bank estimates that the populations of Bolivia, Cambodia, Egypt, Malaysia, Pakistan, Paraguay, Philippines and Venezuela (countries with high birth rates and improving life expectancy) all show population growth rates of around 1.7% per annum. Therefore, in the context of national data, ORS's modelling and plausible international comparisons, it is implausible to assume a net 3% annual growth rate for the Gypsy and Traveller population.

Household growth

35. In addition to population growth influencing the number of households, the size of households also affects the number. Hence, population and household growth rates do not necessarily match directly, mainly due to the current tendency for people to live in smaller (childless or single person) households (including, of course, older people (following divorce or as surviving partners)). Based on such factors, the CLG 2012-based projections convert current population data to a projected household growth rate of 0.85% per annum (compared with a population growth rate of 0.6% per annum).
36. Because the Gypsy and Traveller population is relatively young and has many single parent households, a 1.5% annual population growth could yield higher-than-average household growth rates, particularly if average household sizes fall or if younger-than-average households form. However, while there is evidence that Gypsy and Traveller households already form at an earlier age than in the general population, the scope for a more rapid rate of growth, through even earlier household formation, is limited.
37. Based on the 2011 census, the table below compares the age of household representatives in English households with those in Gypsy and Traveller households – showing that the latter has many more household representatives aged under-25 years. In the general English population 3.6% of household representatives are aged 16-24, compared with 8.7% in the Gypsy and Traveller population. Because the census includes both housed and on-site Gypsies and Travellers without differentiation, it is not possible to know if there are different formation rates on sites and in housing. However, ORS's survey data (for sites in areas such as Central Bedfordshire, Cheshire, Essex, Gloucestershire and a number of authorities in Hertfordshire) shows that about 10% of Gypsy and Traveller households have household representatives aged under-25 years.

Table 5

Age of Head of Household (Source: UK Census of Population 2011)

| Age of household representative | All households in England | | Gypsy and Traveller households in England | |
|---------------------------------|---------------------------|--------------------------|---|--------------------------|
| | Number of households | Percentage of households | Number of households | Percentage of households |
| Age 24 and under | 790,974 | 3.6% | 1,698 | 8.7% |
| Age 25 to 34 | 3,158,258 | 14.3% | 4,232 | 21.7% |
| Age 35 to 49 | 6,563,651 | 29.7% | 6,899 | 35.5% |
| Age 50 to 64 | 5,828,761 | 26.4% | 4,310 | 22.2% |
| Age 65 to 74 | 2,764,474 | 12.5% | 1,473 | 7.6% |
| Age 75 to 84 | 2,097,807 | 9.5% | 682 | 3.5% |
| Age 85 and over | 859,443 | 3.9% | 164 | 0.8% |
| Total | 22,063,368 | 100% | 19,458 | 100% |

38. The following table shows that the proportion of single person Gypsy and Traveller households is not dissimilar to the wider population of England; but there are more lone parents, fewer couples without children, and fewer households with non-dependent children amongst Gypsies and Travellers. This data suggest that Gypsy and Traveller households form at an earlier age than the general population.

Table 6
Household Type (Source: UK Census of Population 2011)

| Household Type | All households in England | | Gypsy and Traveller households in England | |
|---|---------------------------|--------------------------|---|--------------------------|
| | Number of households | Percentage of households | Number of households | Percentage of households |
| Single person | 6,666,493 | 30.3% | 5,741 | 29.5% |
| Couple with no children | 5,681,847 | 25.7% | 2345 | 12.1% |
| Couple with dependent children | 4,266,670 | 19.3% | 3683 | 18.9% |
| Couple with non-dependent children | 1,342,841 | 6.1% | 822 | 4.2% |
| Lone parent: Dependent children | 1,573,255 | 7.1% | 3,949 | 20.3% |
| Lone parent: All children non-dependent | 766,569 | 3.5% | 795 | 4.1% |
| Other households | 1,765,693 | 8.0% | 2,123 | 10.9% |
| Total | 22,063,368 | 100% | 19,458 | 100% |

39. ORS's own site survey data is broadly compatible with the data above. We have found that: around 50% of pitches have dependent children compared with 45% in the census; there is a high proportion of lone parents; and about a fifth of Gypsy and Traveller households appear to be single person households. One possible explanation for the census finding a higher proportion of single person households than the ORS surveys is that many older households are living in bricks and mortar housing (perhaps for health-related reasons).
40. ORS's on-site surveys have also found more female than male residents. It is possible that some single person households were men linked to lone parent females and unwilling to take part in the surveys. A further possible factor is that at any time about 10% of the male Gypsy and Traveller population is in prison – an inference drawn from the fact that about 5% of the male prison population identify themselves as Gypsies and Travellers ('People in Prison: Gypsies, Romany and Travellers', Her Majesty's Inspectorate of Prisons, February 2004) – which implies that around 4,000 Gypsies and Travellers are in prison. Given that almost all of the 4,000 people are male and that there are around 200,000 Gypsies and Travellers in total, this equates to about 4% of the total male population, but closer to 10% of the adult male population.
41. The key point, though, is that since 20% of Gypsy and Traveller households are lone parents, and up to 30% are single persons, there is limited potential for further reductions in average household size to increase current household formation rates significantly – and there is no reason to think that earlier household formations or increasing divorce rates will in the medium term affect household formation rates. While there are differences with the general population, a 1.5% per annum Gypsy and Traveller population

growth rate is likely to lead to a household growth rate of 1.5% per annum – more than the 0.85% for the English population as a whole, but much less than the often assumed 3% rate for Gypsies and Travellers.

Household dissolution rates

42. Finally, consideration of household dissolution rates also suggests that the net household growth rate for Gypsies and Travellers is very unlikely to reach 3% per annum (as often assumed). The table below, derived from ORS's mainstream strategic housing market assessments, shows that generally household dissolution rates are between 1.0% and 1.7% per annum. London is different because people tend to move out upon retirement, rather than remaining in London until death. To adopt a 1.0% dissolution rate as a standard guide nationally would be too low, because it means that average households will live for 70 years after formation. A 1.5% dissolution rate would be a more plausible as a national guide, implying that average households live for 47 years after formation.

Table 7
Annual Dissolution Rates (Source: SHMAs undertaken by ORS)

| Area | Annual projected household dissolution | Number of households | Percentage |
|---|--|----------------------|------------|
| Greater London | 25,000 | 3,266,173 | 0.77% |
| Blaenau Gwent | 468.2 | 30,416 | 1.54% |
| Bradford | 3,355 | 199,296 | 1.68% |
| Ceredigion | 348 | 31,562 | 1.10% |
| Exeter, East Devon, Mid Devon, Teignbridge and Torbay | 4,318 | 254,084 | 1.70% |
| Neath Port Talbot | 1,352 | 57,609 | 2.34% |
| Norwich, South Norfolk and Broadland | 1,626 | 166,464 | 0.98% |
| Suffolk Coastal | 633 | 53,558 | 1.18% |
| Monmouthshire Newport Torfaen | 1,420 | 137,929 | 1.03% |

43. The 1.5% dissolution rate is important because the death rate is a key factor in moderating the *gross* household growth rate. Significantly, applying a 1.5% dissolution rate to a 3% *gross* household growth formation rate yields a *net* rate of 1.5% per annum – which ORS considers is a realistic figure for the Gypsy and Traveller population and which is in line with other demographic information. After all, based on the dissolution rate, a *net* household formation rate of 3% per annum would require a 4.5% per annum *gross* formation rate (which in turn would require extremely unrealistic assumptions about birth rates).

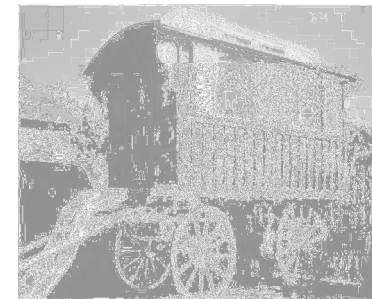
Summary conclusions

44. Future Gypsy and Traveller accommodation needs have typically been over-estimated because population and household growth rates have been projected on the basis of assumed 3% per annum net growth rates.
45. Unreliable caravan counts have been used to support the supposed growth rate, but there is no reason to suppose that the rate of increase in caravans corresponds to the annual growth of the Gypsy and Traveller population or households.

46. The growth of the national Gypsy and Traveller population may be as low as 1.25% per annum – which is still four times greater than in the settled community. Even using extreme and unrealistic assumptions, it is hard to find evidence that the net national Gypsy and Traveller population and household growth is above 2% per annum nationally. The often assumed 3% net household growth rate per annum for Gypsies and Travellers is unrealistic.
47. The best available evidence suggests that the net annual Gypsy and Traveller household growth rate is 1.5% per annum. The often assumed 3% per annum net rate is unrealistic. Some local authorities might allow for a household growth rate of up to 2.5% per annum, to provide a ‘margin’ if their populations are relatively youthful; but in areas where on-site surveys indicate that there are fewer children in the Gypsy and Traveller population, the lower estimate of 1.5% per annum should be used.

Arun Local Plan
 Examination Library
 SELVP30
 Jan 2016
 Revised June 2016

Proposed methodology for assessing permanent sites for Gypsy and Traveller and Travelling Showpeople



The criteria for assessing sites are based around deliverability, accessibility to the site, access to local services, health and safety, and the provision of an acceptable living environment for the site's residents, the potential impact on the surrounding area, and the likelihood that necessary utilities (mains water, electricity etc.) can be provided.

January 2016
Rev A: June 2016

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1.0 INTRODUCTION

- 1.1 The Gypsy and Traveller and Travelling Showpeople Site Allocations document (DPD) will identify land for permanent pitches to meet the need identified to 2027. The need for sites stems from the Coastal West Sussex Gypsy and Traveller and Travelling Showpeople Assessment (GTTA) (phase 1) which identified a need in Arun District for 9 pitches for Gypsy and Travellers and no plots for Travelling Showpeople in the plan period because the need has been met through planning applications
- 1.2 A clear methodology is therefore required to appraise the relative suitability of various sites and to help inform the identification of preferred sites. This paper sets out the methodology to identify and assess potential sites and includes detailed criteria against which proposed sites can be assessed and compared. There are three stages in the process:
- Identifying a long list of potential sites
 - Initial sieve of sites (first sieve)
 - Detailed assessment of sites (second sieve)
- 1.3 In addition, a sustainability appraisal of the sites will be undertaken which will involve appraising potential sites against a series of social, economic and environmental objectives. The criteria for assessing sites are based around deliverability, accessibility to the site, access to local services, health and safety, and the provision of an acceptable living environment for the site's residents, the potential impact on the surrounding area, and the likelihood that necessary utilities (mains water, electricity etc.) can be provided. The site selection criteria are based on national policy and good practice guidance.
- 1.4 **The National Planning Policy Framework (NPPF)**
The Government states that the Planning Policy for Traveller Sites (PPTS) should be read in conjunction with the NPPF so far as relevant. The Government's National Planning Policy Framework (NPPF) was published on 27th March 2012. It is a key part of Government reforms to make the planning system less complex and more accessible, and to protect the environment while promoting sustainable growth.
- 1.5 A revised Planning Policy for Traveller Sites (PPTS) was published in August 2015 and requires that local planning authorities set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. Using the target figures, the PPTS requires that local planning authorities identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites.
- 1.9 Policy H SP5 Traveller and Travelling Showpeople accommodation in the emerging Arun District Council Local Plan outlines the policy approach for the Council to

provide for adequate Traveller accommodation at appropriate locations throughout the District and sets out a range of criteria against which sites can be assessed.

The purpose of this report is therefore to provide an assessment of potential sites to accommodate the Gypsies and Travellers community and to develop a shortlist of potential sites which will meet the identified needs. The results will inform the development of relevant Gypsy and Traveller policies for inclusion within the Local Plan.

2.0 BACKGROUND

- 2.1 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was commissioned jointly by Arun District Council, Adur District and Worthing Borough Councils, Chichester District Council and the South Downs National Park Authority. The GTAA was published in April 2013. However, a number of errors were identified in the report and a change to the methodology used to determine needs (using waiting list data) has resulted in amendments to the document. An updated report was published in May 2015. It should be noted that this report only provides amendments to Gypsy and Traveller data because there was no requirement to update Travelling Showpeople figures.
- 2.2 The targets for Gypsies and Travellers are separated into public and private in order to ensure that the range of accommodation needs for that community can be met through the planning process. It should be noted that there have been no planning permissions granted for Gypsy and Traveller and Traveller Showpeople sites since the AMR 2013/14 was published.
- 2.3 A review of the data shows that, since April 2013, the plot targets for Travelling Showpeople have been met for the next 15 years. This is due to the fact that 3 temporary permissions have been made permanent AL/10/14 and 4 plots were permitted on 2nd September 2014.
- 2.4 The pitch targets for private Gypsy and Travellers pitches between 2012 and 2017 have been met, with an overall net gain of one private pitch since April 2013. However, a further four pitches are required up to 2027. There has been no gain in public pitch provision since April 2013.

3.0 METHODOLOGY

3.1 Stage 1: Identifying a long list of sites

- Take all the sites which were looked at in the GTTA study – i.e. all including those rejected at a later stage
- Any sites forwarded for G&T sites as part of the Strategic Housing Land Availability Assessment(SHLAA)
- Any sites which the enforcement team may have come across i.e. existing unauthorised sites
- Any sites which have permanent planning permission which may be intensified
- Any sites which have temporary permission

3.2 Stage 2: Initial sieve of sites - first sieve

All sites will be considered, if any sites are covered by the broad criteria below the sites will be excluded from further investigation:

- The site is unavailable and/or has ownership constraints
- Located in Flood Zones 3a, 3b and 2 – if there is no prospect of altering the flood risk
- Former waste tips or other contaminated land
- Potential impact on international or national designation
- The site is steeply sloping

3.3 Stage 3: Detailed assessment of sites – second sieve

All sites which have not been excluded in the first sieve will be assessed against the criteria in the table 1. This is in order for transparency in the site assessments. The methodology for the scoring is to identify, where possible, positive, neutral and negative effects through the assessment matrices where possible.

The assessment will lead to the sites being appraised and ordered into suitable and not suitable.

Table 1: Proposed Assessment Criteria and Scoring

(✓ POSITIVE ✓✓ VERY POSITIVE ~ NEUTRAL ✗ NEGATIVE ✗✗ VERY NEGATIVE)

| Assessment Topic | Assessment Criteria | Scoring | Method of assessment | Compatible with the principles for allocation |
|---|--|---------|-----------------------------------|---|
| Access to Services | | | | |
| Distance from primary school | The site is located up to 2 km from a primary school | ✓✓ | GIS / Settlement Capacity Profile | Criterion c |
| | The site is located between 2 - 4km from a primary school | ~ | | |
| | The site is located over 4 km from a primary school | ✗ | | |
| Distance to local / village shops | The site is located up to 2 km from local / village shops | ✓✓ | GIS / Settlement Capacity Profile | Criterion c |
| | The site is located between 2 - 4km from local / village shops | ~ | | |
| | The site is located over 4 km from local / village shops | ✗ | | |
| Distance to health centre / doctors surgery | The site is located up to 2 km from a health centre / doctors surgery | ✓✓ | GIS / Settlement Capacity Profile | Criterion c |
| | The site is located between 2 - 4km from a health centre / doctors surgery | ~ | | |
| | The site is located over 4 km from a health centre / doctors surgery | ✗ | | |
| Distance from nearest A road | The site lies within 0.5 km of an A road | ✓✓ | GIS | Criterion c |
| | The site lies between 0.5 and 1km of an A road | ~ | | |
| | The site is further than 1km from an A road | ✗✗ | | |
| Community | | | | |
| Impact on surrounding community | The site does not dominate the nearest settlement | ✓ | Site visit / GIS | Criterion a |
| | The site dominates the nearest | ✗ | | |

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|--|---|----|---|-------------|
| | settlement | | | |
| Liveability | | | | |
| Impact of noise or odour (main road, railway etc) | Development would not be affected by noise or odour | ✓✓ | Site visit / consult environmental health | Criterion c |
| | Development is likely to be affected by noise or odour | ~ | | |
| | Development is likely to be significantly affected by noise and impact could not be mitigated. | ✗ | | |
| Storage for Travelling Showpeople | There is room for the storage of equipment | ✓✓ | GIS / site visit | Criterion f |
| | There is no room for the storage of equipment | ✗✗ | | |
| Biodiversity | | | | |
| Impact on a local site of biodiversity or geological value or affect legally protected species | Site would not impact on a nationally, regional or local site of biodiversity or geological value or affect legally protected species | ✓✓ | Site visit / GIS | Criterion d |
| | Site would impact on a nationally, regional or local site of biodiversity or geological value or affect legally protected species but could be satisfactorily mitigated | ✓ | | |
| | Site would impact on a nationally, regional or local site of biodiversity or geological value or affect legally protected species and could not be satisfactorily mitigated | ✗ | | |
| Other ecological features (including BAP priority habitats and species, trees, woodland etc) | Development of the site is likely to enable the retention and enhancement of existing features | ✓✓ | GIS / Consultation with English Nature and Wildlife Trust | Criterion d |
| | Development of the | ✓ | | |

| | | | | |
|-----------------------|--|----|--|-------------|
| | site would impact on the ecological quality of the site but impact could be mitigated or compensated | | | |
| | Development of the site would impact on the ecological quality of the site but impact could not be mitigated or compensated | x | | |
| Landscape | | | | |
| Landscape designation | Landscape has low sensitivity to development (not visible, existing landscape is poor quality, existing features could be retained) or no impact (e.g. in built up area) | ✓✓ | GIS and landscape study | Criterion g |
| | Landscape has low sensitivity to development | ✓ | | |
| | Site has medium to high sensitivity to development (Development likely to detract from landscape, existing features unlikely to be retained in entirety) | ~ | | |
| | High sensitivity to development (Development would significantly detract from the landscape features unlikely to be retained and mitigation not possible) | x | | |
| Visual Impact | The site is visually contained | ✓ | Site visit / advice from landscape section | Criterion g |
| | The site mainly contained however additional planting | ~ | | |

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|--|--|----|--|-------------|
| | would enhance the setting | | | |
| | The site is in open countryside where additional planting would be out of character | x | | |
| Coalescence | Development does not lead to the perception of coalescence of villages / settlements | ✓ | Site visit / GIS | Criterion g |
| | Development leads to the perception of coalescence of villages / settlements | x | | |
| Cultural Heritage | | | | |
| Heritage and Archaeology (Heritage Assets including conservation areas, SAM's) | Development has the potential to enhance the historic or cultural environment | ✓✓ | GIS | Criterion i |
| | Site unlikely to impact on the historic or cultural environment | ✓ | | |
| | Development is likely to have a negative impact on the historic environment or cultural but this impact could be mitigated | ~ | | |
| | Development is likely to have a significant negative impact on the historic or cultural environment | x | | |
| Infrastructure | | | | |
| Suitable access for level of use | Satisfactory access can be gained to the site | ✓✓ | Site visit and consultation with WSCC as highway authority | Criterion c |
| | Satisfactory access cannot be gained to the site | xx | | |
| Capacity of the highway network | Sufficient capacity no constraints | ✓✓ | Consultation with WSCC highways | Criterion c |
| | Capacity limited or insufficient capacity but constraints can be overcome | ~ | | |
| | Insufficient capacity and constraints | xx | | |

| | | | | |
|--|--|----|--|-------------|
| | cannot be overcome | | | |
| Capacity of existing infrastructure and services (water, sewage, electricity and/or gas) | Sufficient capacity | ✓✓ | Consultation with Infrastructure providers | Criterion h |
| | Capacity limited or insufficient but constraints can be overcome | ~ | | |
| | Insufficient capacity and constraints cannot be overcome | xx | | |
| Drainage infrastructure | Extensive new drainage infrastructure would be required | xx | Consultation with EA and WSCC drainage board | Criterion h |
| | Extensive new drainage infrastructure would not be required | ✓✓ | | |
| Deliverability | | | | |
| What is the likely timescale for delivery of the site? | Developable within 5 years | ✓✓ | Site assessment and speaking with the land owner | |
| | Developable in 6-10 years | ✓ | | |
| | Developable in 11-15 years | ~ | | |
| | Developable beyond 15 years | x | | |
| Other information | | | | |
| Relevant planning history | | | | |
| Summary of Assessment | | | | |

Criteria Description from Local Plan 2011-2031 Publication Version October 2014 Policy H SP5

- a. Be of a scale appropriate to their setting, having regard to the scale and form of nearby residential development.
- b. Be located in areas not prone to flooding and or near refuse sites, industrial sites or similar. Where satisfactory mitigation measures are being proposed to address flooding issues, however, development may be considered. This shall not be on sloping exposed sites, unstable sites or on contaminated land. Where land has been appropriately decontaminated, however, development may be considered.

- c. easy and safe access to sustainable settlements with a range of local services including schools, shops and healthcare facilities either by foot, cycle, public transport or car. Notwithstanding this, residential sites shall not be located immediately adjacent to major transport corridors unless noise, safety and air quality impacts can be mitigated.
- d. Be located in areas that are not within an international, national or local nature conservation designation or where they will have a significant effect upon any designation.
- e. Where possible, make effective use of previously developed or derelict land.
- f. Be located so that sites, including any on-site business uses, shall not negatively impact on the safety, amenity and privacy of the occupants of the site and neighbouring residents and land uses. Adequate space for the storage of equipment for business uses shall be provided on site. Such areas shall be visually pleasing and not impinge on amenity areas.
- g. Incorporate appropriate landscaping and boundary treatment, including existing natural landscape features such as trees (particularly mature trees and hedging). Planning conditions or planning obligations shall be used in this regard. Where new boundary treatment is proposed, it shall be sympathetic to and in keeping with the surrounding area.
- h. Be served (or be capable of being served) by an adequate water supply and appropriate means of sewage disposal. In circumstances where this is not possible, suitable alternative arrangements may be made with the agreement of the Planning Authority.
- i. Be located to ensure there is no adverse impact on the historic environment or individual heritage assets therein or their setting.

4.0 OUTCOME

- 4.1 Following site appraisal the preferred strategy for allocating sites may be a combination of:
1. Allocation of new sites
 2. Extensions to existing authorised sites
 3. Increasing capacity at existing authorised sites i.e. within the existing site
 4. Examining whether existing, well established sites, which have a temporary permission rather than full planning permission are suitable to be regularised.
- 4.2 The assessment will eventually provide:
- a) A list of sites considered for potential allocation as a permanent Gypsy and Traveller or Travelling Showpeople accommodation and maps showing locations and boundaries of specific sites;
 - b) An assessment of deliverability / developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when and how an identified site could realistically be expected to be delivered.
 - c) The potential quantity of accommodation that could be delivered; and
 - d) Any recommendation on how any identified constraints can be overcome on shortlisted sites.

AGENDA ITEM NO. 10**ARUN DISTRICT COUNCIL****REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 5 DECEMBER 2018****PART A : REPORT**

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| SUBJECT: Response to Draft Local Plan for Worthing Borough Council |
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| REPORT AUTHOR: Kevin Owen, Planning Policy Team Leader |
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| DATE: 12 November 2018 |
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| EXTN: X 37853 |
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| PORTFOLIO AREA: Planning |
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EXECUTIVE SUMMARY:

This report provides information on Worthing Borough Council's Local Plan consultation. The Draft Worthing Local Plan covers the period 2016 to 2033 and has been put to public consultation for six week 31 October to 12 December 2018. The proposed plan sets out a strategy, site allocations and policies to deliver Worthing's housing and development needs over this period. Arun will need to make a response because of the cross boundary implications of this plan which does not propose to meet all of its overall Objectively Assessed Housing Need (OAN) which is significant because Worthing is within a shared housing market area (HMA) with Arun and Adur, Brighton & Hove, Chichester, Lewes, Worthing and the South Downs National Park Authority.

RECOMMENDATIONS:

The Sub-Committee is asked to:

1. Agree that the Conclusions set out in Paragraphs 1.14 to 1.16 (inclusive) in this report be Arun District Councils' formal response to the Worthing draft Local Plan Regulation 18 Consultation.

1. BACKGROUND:

- 1.1 Worthing has been progressing the preparation of a new development plan called the 'Worthing Local Plan' which covers the plan period 2016 to 2033. An Issues and Options consultation took place in 2016 and this current stage is known as the Regulation 18 draft plan consultation stage which responds to comments previously submitted on issues and options. Arun submitted a response to this issues and options consultation as follows:-

"Thank you for consulting Arun District Council on your Issues & Options document. After reviewing the document we have the following officer response that will be presented to our Local Plan Sub-Committee on 30th June and then Council for final sign off.

The Council is glad to see that all development opportunities are being investigated through the evidence base for delivering the objective needs of Worthing Borough. Considering the position of need against supply, it will be important for consideration of higher densities and mixes of uses to be investigated. Additionally, an approach that is flexible towards development of larger residential gardens would seem a more pragmatic approach than resisting all developments of this nature. Finally, it will be important for all the evidence to have fully incorporated as much mitigation as possible.

We would wish to be kept informed of developments both in terms of evidence and approach towards the sites against the Borough boundary with Arun District and furthering our respective needs through the Duty to Co-operate.”

1.2 The Local Plan (Plan) will replace the Worthing Core Strategy (2011 - 2026) and will cover Worthing District but exclude those areas within the South Down’s National Park (SDNP) planning authority area. The plan states that it aims to meet Worthing’s OAN and infrastructure requirements, identify land where development would be appropriate and provide a strategy and core policies for securing growth and regeneration through securing local facilities and infrastructure while protecting and enhancing the natural and built historic environment.

1.3 The Plan consultation is accompanied by numerous evidence studies including Worthing Housing Study June 2015 and a Housing Implementation Strategy. The latter document concluded that Worthing’s OAN based on the standard housing methodology introduced by the revised National Planning Policy Framework (NPPF18) and the 2016 based household projections (published September 2016) equates to 12,801 dwellings or 753 dwellings per annum (dpa) over the plan period to 2033.

REPORT

1.4 The draft Plan sets out a vision and 20 supporting strategic objectives. The vision talks about Worthing continuing to provide an attractive location for people visit, live and work in and to attract high calibre business but also recognises that because Worthing has very little land (92% of the Borough is developed - excluding the part that lies within SDNP) the Plan must develop land in the most efficient way to maximise the widest range of identified needs whilst at the same time ensuring that the Borough’s quality environment is protected and enhanced.

1.5 The Plan’s Strategy for the future development of Worthing consequently focuses on achieving as much of Worthing’s needs as possible through regeneration and transforming 6 ‘Areas of Change’ and developing 8 brownfield and 3 omission sites within the Built up Area Boundary (BUAB). Smaller sites will also be expected to make a contribution.

- 1.6 Outside the Worthing BUAB, because of the potential danger of coalescence with Ferring in the west to Lancing in the east, there are only considered to be a limited number of sites that could be positively looked at. Consequently, following Sustainability Appraisal, three sites will provide potential development without damaging the character and environment of the Borough (i.e. without threatening development on open spaces in important protected Local Green Gaps e.g. Goring-Ferring Gap and Chatsworth Farm).
- 1.7 To recognise the constrained context for growth the housing target has therefore, been tested against land supply (as established by the 2017 published SHLAA and 'brownfield register' and following a 'call for sites' exercise). The Housing Implementation Strategy concludes that there is only capacity to provide 4,182 dwellings (i.e. a minimum of 242 dpa) over the plan period. This would leave a significant shortfall of 8,600 dwellings or 77% of the OAN over the Plan period.
- 1.8 In line with the NPPF (2018) the Plan emphasises the need for maximising the use of land through setting minimum densities through a design led approach, related to transport accessibility, anticipating 35 dwelling per hectare for family housing up to 50 dwellings per ha within the town centre (e.g. through flatted development).
- 1.9 With regard to employment needs, the Plan proposes B class floor space allocations (circa 11 ha) to reflect the capacity constrained housing target. The Employment Land Review 2016 considers that most of the employment land is well used and occupied and of good or reasonable standard and should be retained. There are some poorer elements of supply (e.g. poor access/amenity) but these are well occupied with reasonable prospect for continuing employment use. Worthing has sustained some B1 and B2 stock losses and coupled with the need to stimulate new sectors and growth but with little opportunity for new land allocations, the approach is to protect employment land and keep the matter under review.

Key Issues

- 1.10 It is in Arun's interests to see that "neighbouring" local authorities (including those that are within the Housing Market area but not immediately adjacent to Arun) do all they can to accommodate their own growth needs sustainably – under the 'Duty to Cooperate' authorities must identify cross boundary matters and try to resolve these matters through cooperation leading to Statements of Common Ground or Memoranda of Understanding. The NPPF places more emphasis on resolving such cross boundary matters early in plan making to ensure that needs are met and plans are sound and deliverable.
- 1.11 Arun has an adopted Local Plan and has already made provision under the 'Duty to Cooperate' to accommodate some of the need arising in Worthing (and Chichester) which when combined amounts to some 1,600 dwellings. Any additional shortfall arising from Worthing from their new plan would be a matter for the next Arun Local Plan review in a few years' time. Worthing have not asked Arun to address any further unmet need arising from their Plan preparation under the 'Duty to Cooperate' at this stage.

- 1.12 Worthing cite the 'Duty to Cooperate' engagement process already committed to by the West Sussex Coastal and Greater Brighton authorities in progressing the Local Strategic Statement (LSS) 2 to LLS3 as the appropriate framework for agreeing how unmet needs across the coastal authorities should be resolved. However, this process has been delayed pending resource and governance arrangements being adequately put in place in order to secure real outcomes on the future distribution of any unmet needs. Authorities within the sub region therefore, face significant political challenges unless the LSS3 matters are progressed swiftly. Consequently, there is a big risk to plan making within the sub-region with emerging plans potentially being found unsound or failing under the 'Duty to Cooperate'.
- 1.13 While the Worthing Local Plan will significantly undershoot its OAN, it is apparent that the economic strategy is commensurate with this and so will not pose significant imbalances that lead to increased commuting pressures across neighbouring authorities (although it should be noted that Arun is assisting with Worthing's employment land shortfall and this strategy will influence some commuting). Nevertheless, the regeneration emphasis coupled with husbanding of employment land in Worthing should help to reduce further pressure for out commuting. However, as it stands, there is likely to be significant housing pressure and an impact on local services in neighbouring authorities because people will be forced to seek to live close to but outside of Worthing's District.

Conclusions

- 1.14 It is recognised and acknowledged, that the current proposed strategy within the emerging Worthing Local Plan has been based on a considerable amount of evidence work and effort in trying to identify land to meet Worthing's OAN and other needs. However, despite these efforts a significant shortfall in the OAN remains. Arun considers that the expectation and reliance placed on the LSS3 process has proved to be too optimistic (which is also the case for all of the other relevant authorities – including Arun) and in particular, Arun considers that there are still some actions within the remit of Worthing that have been left unresolved which may bring other sources of supply and more deliverable solutions.
- 1.15 For this reason, Arun considers that it has no choice but to object to the draft Local Plan as proposed because it leaves a significant unmet need unresolved which will be prejudicial to Arun's own Local Plan preparation over the next few years. Indeed, this may similarly be the case for other neighbouring authorities embarking on plan making within the Housing Market Area (HMA). Nevertheless, Arun considers that through the Duty to Cooperate and proposed actions set out below, that both authorities (including with other neighbouring authorities within the HMA) can work together to remove Arun's objection in progressing Worthing's Local Plan. The key actions that need to be addressed are as follows :-
- Worthing District review its plan making timetable in order to engage on a process that would seek to align plan making timetables with other neighbouring plan reviews within the HMA including where feasible, to an agreed a revised strategic timetable for the LSS3 process, should concrete actions be taken to accelerate deliverable outcomes;

- Before progressing Worthing’s plan timetable further, undertake specific bi-lateral Duty to Cooperate meetings with Worthing’s neighbouring authorities in order to fully understand the potential cross boundary matters and necessary mitigations that would be needed to resolve impacts - to be secured through updated Statements of Common Ground or Memoranda of Understanding in accordance with the NPPF as early as possible in plan making;
- Undertake further detailed evidence on urban capacity within the District with regard to ‘Design led’ solutions to securing housing delivery through mixed use development, maximising the efficiency of land use and setting minimum densities at appropriate public transport accessible locations (including scope for high rise flatted development where appropriate as well as using car parking land more efficiently), in order to update its housing capacity assessment;
- In particular, review Worthing’s lower order employment sites to determine whether there is scope for employment regeneration through potential mixed use schemes that improve viability both to improve the employment stock while also securing a contribution towards other needs such as housing over the plan period;
- In any event, build in trigger and early review mechanisms into Worthing’s draft Local Plan to ensure that Worthing’s development strategy can be adjusted to reflect needs and opportunities identified through its ongoing evidence preparation, including joint evidence preparation and studies where necessary, and to coordinate with plan making in neighbouring areas.

1.16 Should Worthing not be able to accommodate these actions, then Arun will not be able to resolve its objection to the proposed Plan strategy because of the significant impacts that would arise on the communities and environment of Arun (and indeed other neighbouring authorities). In particular, should Worthing adopt a plan based on this strategy, the prejudicial uncertainty that would be posed to Arun’s own future plan review and risk to soundness would be unacceptable given the absence of strategic unmet needs having been satisfactorily resolved via the Duty to Cooperate and insufficient progress on LSS3.

2. PROPOSAL(S):

That the report be noted and the recommendation agreed as the Councils formal response to the Worthing Draft Local Plan Regulation 18 public consultation.

3. **OPTIONS:** To object to Worthing’s draft Local Plan

4. CONSULTATION:

Has consultation been undertaken with:

Relevant Town/Parish Council

YES

NO

x

Relevant District Ward Councillors

x

Other groups/persons (please specify)

5. ARE THERE ANY IMPLICATIONS IN RELATION TO

YES

NO

| | | |
|--|--|---|
| THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below) | | |
| Financial | | X |
| Legal | | X |
| Human Rights/Equality Impact Assessment | | X |
| Community Safety including Section 17 of Crime & Disorder Act | | X |
| Sustainability | | X |
| Asset Management/Property/Land | | X |
| Technology | | X |
| Other (please explain) | | X |

6. IMPLICATIONS:

The potential impact on Arun's environment, infrastructure and communities arising from unmet needs from a neighbouring local authority and implications for the soundness of plan making including risks under the 'Duty to Cooperate' as well as coordination of plan making timetables.

7. REASON FOR THE DECISION:

To ensure that Arun can continue to ensure that development is plan led and consistent with sustainable development in addressing its own needs as well as ensuring that "neighbouring areas" meet their own needs including any unmet needs through an agreed strategic approach across the West Sussex Coastal and Greater Brighton area.

8. BACKGROUND PAPERS:

All relevant documents, including the evidence base, summary leaflets and response form can be viewed on the Council's website from 31st October at:

www.adurworthing.gov.uk/worthing-local-plan/.