



Public Document Pack

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14 November 2024

PLANNING POLICY COMMITTEE

A meeting of the Planning Policy Committee will be held in **Council Chamber, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Thursday 28 November 2024 at 6.00 pm** and you are requested to attend.

Members: Councillors Yeates (Chair), Lury (Vice-Chair), Bower, Elkins, Goodheart, Huntley, Long, McAuliffe, Partridge, Mrs Stainton and Tandy

PLEASE NOTE:

A live webcast of the meeting will be available via the Council's [Web Pages](#)

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email Committees@arun.gov.uk by 5.15 pm on **Thursday, 21 November 2024** in line with current Committee Meeting Procedure Rules.

For further information on the items to be discussed, please contact Committees@arun.gov.uk

AGENDA

1. **APOLOGIES**
2. **DECLARATIONS OF INTEREST**

Members and Officers are invited to make any declaration 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 items 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 interest and/or prejudicial interest
- c) the nature of the interest

3. MINUTES (Pages 1 - 18)

The Committee will be asked to approve as a correct record the Minutes of the Planning Policy Committee held on 18 September 2024 and 26 September 2024.

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

5. PUBLIC QUESTION TIME

To receive questions from the public (for a period of up to 15 minutes).

6. SOUTHERN WATER DRAFT WATER RESOURCE MANAGEMENT PLAN (WRMP) CONSULTATION (11 SEPTEMBER TO 4 DECEMBER 2024) (Pages 19 - 30)

To update the Committee on the key messages from the current consultation on Southern Water's revised draft Water Resources Management Plan 2024 (WRMP24), including any changes that may directly and indirectly affect Arun residents.

7. BROWNFIELD LAND REGISTER UPDATE (Pages 31 - 54)

To update the Committee on Arun's' Brownfield Land Register 2024 and any changes to it since it was published in 2023. The Brownfield Land Register (BLR) will then be published and used as the basis for the annual BLR statistical return to Government (in a prescribed format) required by national legislation.

OUTSIDE BODIES - FEEDBACK FROM MEETINGS

8. WORK PROGRAMME (Pages 55 - 56)

The Committee's Work Programme for 2024-25 is attached for the Committee's information.

Note: If Members have any detailed questions, they are reminded that they need to inform the Chair and relevant Director in advance of the meeting.

Note: Filming, Photography and Recording at Council Meetings – The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link [PART 8 - CP - Section 5 Filming Photographic Protocol](#)

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PLANNING POLICY COMMITTEE

18 September 2024 at 6.00 pm

Present: Councillors Yeates (Chair), Lury (Vice-Chair), Bower, Goodheart, Gunner (substitute for Elkins), Huntley, Long, McAuliffe, Partridge, Tandy and Turner (substitute for Stainton)

Councillors Butcher and McDougall were also in attendance for all or part of the meeting.

[Note – The following Councillors were absent from the meeting during consideration of the following items of business: Councillors Lury and Tandy – Minute 47 (Part)]

226. APOLOGIES

Apologies were received from Councillors Elkins and Stainton.

227. DECLARATIONS OF INTEREST

There were no declarations of interest.

228. MINUTES

The minutes of the Planning Policy Committee held on 6 June 2024 were approved and signed by the Chair.

229. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair confirmed that there were no urgent items for this meeting.

230. PUBLIC QUESTION TIME

There were no public questions submitted for this meeting.

231. REVISIONS TO NATIONAL PLANNING POLICY FRAMEWORK (NPPF) 2024 - PROPOSED ARUN DC RESPONSE TO PUBLIC CONSULTATION

The Chair thanked officers for the work undertaken in compiling responses to the consultation being undertaken by the Ministry for Housing Communities and Local Government (MHCLG) on the National Planning Policy Framework (NPPF), set out at appendix 1. Members were asked to limit their comments to the questions contained within the consultation.

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The Interim Head of Planning Policy was invited by the Chair to present the report to the Committee. He advised that the MHCLG consultation on the NPPF proposed fundamental changes to the way Arun District Council carries out its planning function. He thanked members for attending the all member NPPF briefing session held on 9 September 2024.

He reminded members of the proposed key changes to the NPPF set out at paragraph 1.4 of the report, as follows:

- The proposed housing numbers under the new standard methodology will result in an increased housing target in Arun of 1,400 dwellings per year, a 5% increase. The proposed increase for the whole of West Sussex was 38% which would make it more difficult for councils to meet the Duty to Cooperate. The Government's proposals sought to ask each local authority to do its part, whereas the previous methodology had included a factor for urban and metropolitan areas to take higher densities. The proposal to make the housing numbers mandatory instead of advisory would remove the circumstances that had previously justified Arun to propose less housing in the Local Plan. If the required housing numbers were not found, the Local Plan could potentially be found unsound. Local plans would be required to set out 'how' the housing figure will be delivered and not 'if' it will be delivered. For the first time the Council will be required to demonstrate a 5-year housing land supply at all times. This removed the previous protection for recently adopted Local plans and potentially negating the benefits of having an up-to-date Local Plan. Arun has already found it difficult to demonstrate a 5-year housing land supply and had failed the housing delivery test by scoring under 75% of its target for a number of years. Meeting the housing target was likely to become more challenging and lead to significantly more speculative development on unsuitable sites being granted planning permission on appeal. The 5% housing land supply buffer for all local authorities was being re-introduced requiring them to demonstrate a 5.25-year housing land supply in all cases. However, Arun due to its previous housing undersupply and the difficulty of meeting the high numbers will need to keep its 20% buffer. This will result in Arun's 5-year housing land supply becoming a 6-year housing land supply, whereas currently it was at 4.17 years.
- No further changes were proposed to Neighbourhood plans since those made to paragraph 14 of the NPPF in December 2024 that had given additional protection to those produced within the previous five years. However, although good in theory in practice the test is whether the identified need will be based on the overall housing need and therefore may not give the level of protection hoped for.
- He referred to the consultation narrative that the planning system was broken and unable to deliver housing and of creating turbo growth to trickle down in terms of increasing affordable housing. Whilst a laudable ambition, the Council can only grant planning permissions and allocate sites, as it was for the developers, land owners and house builders to build the number of houses required. The Council could not demonstrate a 5-year land housing supply if developers were not building out their permissions, resulting in the Council being

penalised. Officers had hoped that the consultation would have set out measures to encourage developers to build out on their planning permissions. In this respect officers considered that the narrative should move away from placing the blame on a lack of planning permissions and allocations to address the reasons why developers were not building.

- Referring to the proposed removal of high-density development being out of character, officers were concerned that its removal in certain places would encourage development on land that the local planning authority may not find acceptable.
- The terms beauty and beautiful were also proposed to be removed and if the NPPF still refers to high quality and sustainable development officers had no concerns regarding their removal.
- There was an indication that strategic planning will return as a way to overcome the duty to cooperate.
- Officers considered the removal of the agricultural land to provide food supply footnote unnecessary. The Government still said in the NPPF that higher grade agricultural land will be protected but given the worldwide instability concerning food supply the removal of the footnote was unnecessary.
- He also referred to the proposal to increase householder application fees.

He welcomed welcome recommendations from the Committee on the consultation responses provided by officers particularly if members disagreed or felt a response should be strengthened.

Although greenbelt and nationally significant infrastructure had not been covered in great detail by officers, some responses had been suggested surrounding viability. Questions 89-102 related to planning fees, including those locally set and introducing fees for other planning services.

He referred to an email dated 13 September 2024 circulated to members and officers from Cllr McAuliffe providing his detailed comments to a number of questions. Officers were particularly supportive of his comments concerning affordable housing and climate change in respect of questions 45, 50, 57, 70, 74, 79 and 85. It was considered that these comments added value to the Council's draft response and officers, subject to the Committee's agreement, suggested including them in the final response to the MHCLG.

It was noted that recommendation 2.1 should read ' appendix 1' not 'appendix 2'.

The recommendations were proposed by Councillor Lury and seconded by Councillor Partridge.

The Chair invited questions and comments from members who provided comments and amendments to the consultation response, as set out below:

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Q4 - Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?: Add to end of last sentence ‘... and damaging to the local communities character’.

Q14 - Do you have any other suggestions relating to the proposals in this chapter?: Officers to add:

- A sentence that local planning authorities are making local plans in the knowledge that if the 5-year housing land supply;
- Include the point that this is about incentivising, not punishing developers.

Q16 - Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method’s baseline, is appropriate?: Amend to read – Unsure, the Council believes using an average figure for the workplace-based median house price to median earnings ratio could potentially result in a more consistent figure for use in the calculation of the baseline but consider on the whole needs further consideration.

Q18 - Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?: line 5: replace ‘affordability’ with ‘affordable’.

Q19 - Do you have any additional comments on the proposed method for assessing housing needs?:

- Para 6, line 5: Remove ‘over’
- Remove last paragraph

Q22 - Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?: Final sentence: Replace ‘requited’ with ‘required’.

Q29 - Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?:

- Amend text to read ‘...designation or other land outside the Green Belt that perform the same function or similar function e.g. strategic gaps which, the Council believes should be recognised at the national level should be preserved and the functions not fettered’.
- Officer to add Councillor McAuliffe’s suggestions concerning Green Belt, as considered appropriate, submitted in advance of the meeting.

Q52 - What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?:

- Final sentence: Add ‘(RSL)’ after Registered Social Landlords
- Para 2, line 2: Replace ‘RLS’s’ with ‘RSL’s’.
- Add sentence to para 1: Greater assistance given to help councils deliver housing themselves would also be welcomed.

Q53 - What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?: Amend reply to state that the maximum need should be based on a percentage based on local need.

Q61 - Do you have any other suggestions relating to the proposals in this chapter?:

Councillor Lury proposed, seconded by Councillor Huntley, a proposal to add the word 'resilience' and wording around it to explain its meaning.

Following a vote this amendment was CARRIED.

Councillor Yeates proposed, seconded by Councillor Huntley, a proposal to add text surrounding lifetime homes that do not require retrospective adaption.

Following a vote this amendment was CARRIED.

Q62 – Do you agree with the changes proposed to paragraphs 86 (b) and 87 of the existing NPPF?

Councillor Yeates proposed, seconded by Councillor McAuliffe, a proposal to add reference to 'renewable technologies'.

Following a vote this amendment was CARRIED.

Q67 - Do you agree with the changes proposed to paragraph 100 of the existing NPPF?: Question incorrectly states paragraph 100 instead of paragraph 99.

Q68 - Do you agree with the changes proposed to paragraph 99 of the existing NPPF?: Question incorrectly states paragraph 99 instead of paragraph 98.

Q69 - Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?: The following suggested amendments under this question concerning paragraph 115 will be added elsewhere under the most suitable question: Reasons for refusal on highway grounds should take account of unacceptable accumulative impact on measurable environmental parameters, such as

- Air quality
- Water impact
- Noise disturbance
- Light pollution
- Protected species and habitats

Q73 – Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?: Amend first sentence to read '.. and low carbon development should be...'

Q74 - Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?: Add Councillor McAuliffe's previously submitted comment in

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full: 'It is not considered that 'compensatory mechanisms' are suitable as the necessary technological solutions do not exist at the scale required nor is the necessary technology proven as yet. Additionally, compensation via habitat translocation or off-site creation have a very high failure rate and cannot guarantee that compensation will be realised. It is not therefore considered that the risks and likelihood of successful compensation support this approach'.

Q80 - Are any changes needed to policy for managing flood risk to improve its effectiveness?: Amend first sentence: 'Yes – like some other parts of the country, Arun suffers greatly and economically greatly from the risk and incidences of coastal, fluvial and surface water and ground water flooding...'

Q91 - If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?: Add 'Yes, we have no evidence to dispute the Government's estimate of the average costs'.

Q94 - Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below:

Councillor Gunner proposed, an amendment proposing to change the first word 'Unsure' to 'Yes' seconded by Councillor Partridge.

Officers to change response on line 1 to yes and to provide wording surrounding the final sentence:

- 'Yes, we acknowledge that local fee setting can be...' and
- '...however having said the above there would be separate consideration to whether the Council wants to set its own fee or nationally set fee'.

Following a vote this amendment was CARRIED.

During the discussion members, and one non-Committee member observing the meeting, raised a number of points were raised concerning the proposed changes to the NPPF, as follows:

- Concern that Arun will not be able to meet the housing numbers required in the 5YHLS and that the requirement to have a 5YHLS at all times will result in the Local Plan being out of date as soon as it is adopted.
- The proposals will result in an increase in speculative development.
- Approximately 8,000 planning permissions had not been built was the reason that Arun has not been able to meet the 5YHLS.
- The changes would result in a requirement for Arun to have a 5.2YHLS at all times, in effect equating to a 6YHLS.
- Arun has the highest requirement in West Sussex for housing provision.
- Developers will not deliver housing following planning permission if it was not financially viable for them to do so.
- The lack of skilled workforce and building materials.
- The constraints within Arun, that included the South Downs National Park, flood plains, coastal plain and a high risk of flooding.

- Councils should not be made responsible for the housing shortfall, as it was not in their control.
- The lack of infrastructure provision for the delivery of housing is not being addressed.
- It was considered that the agricultural land footnote should remain.

At the conclusion of the debate, Councillor Gunner proposed, seconded by Councillor Turner, the addition of a third recommendation that the Council expresses its grave concerns about the impact these proposals would have on our area and to send a letter to the Government signed by all Group leaders on that basis. This letter should also go out to all MPs in the District asking them to do likewise.

The Group leaders present at the meeting confirmed that they were in support of an all-Group leaders' letter to be sent to the Government. Cllr Lury undertook to draft the letter for approval by the Group leaders with the intention of submitting the letter before the consultation deadline.

Councillor Turner, as seconder to the proposal, commented on the common-sense and the consensus expressed by members during the discussion of the consultation responses.

Following a vote the additional recommendation iii, as above, was declared CARRIED.

Councillor Gunner proposed, seconded by Councillor Partridge, an amendment to recommendation ii, the changes can be seen highlighted in strikethrough and **bold** as follows:

- ii. Agree the draft responses to the 106 questions within the consultation as set out in Appendix 2 1 to this report, **with delegation to the Group Head of Planning to make consequential amendments following the Committee's discussion in consultation with the Chair of the Planning Policy Committee**, for submission to MHCLG as being the formal consultation response on behalf of Arun District Council.

Following a vote the amendment to recommendation ii, as above, was declared CARRIED.

The Chair then undertook the vote for the substantive recommendations that had previously been proposed and seconded.

The Committee

RESOLVED

- i. Consider the proposed revisions to the National Planning Policy Framework (NPPF), taking into account officers' advice; and
- ii. Agree the draft responses to the 106 questions within the consultation as set out in Appendix 1 to this report, with delegation to the Group Head of

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Planning to make consequential amendments following the Committee's discussion in consultation with the Chair of the Planning Policy Committee for submission to MHCLG as being the formal consultation response on behalf of Arun District Council.

- iii. That the Council expresses its grave concerns about the impact these proposals would have on our area and to send a letter to the Government signed by all Group leaders on that basis. This letter should also go out to all MPs in the District asking them to do likewise.

(The meeting concluded at 8.54 pm)

PLANNING POLICY COMMITTEE

26 September 2024 at 6.00 pm

Present: Councillors Yeates (Chair), Lury (Vice-Chair), Bower, Elkins, Goodheart, Huntley, Long, McAuliffe, Partridge, Mrs Stainton and Tandy

Councillor McDougall was also in attendance for all or part of the meeting.

235. MINUTE'S SILENCE

The Group Head of Planning informed the Committee of the sad news of the passing of Charlie Hardy a member of the Council's Planning Policy Team. He informed members that the Planning department's condolences had been passed to Charlie's family and that he was sure that the Committee would wish to do so as well.

All present then stood and observed one minute's silence in her memory.

236. APOLOGIES

There were no apologies.

237. DECLARATIONS OF INTEREST

Councillor Elkins declared a Personal Interest in respect of Agenda Items 8 and 10 as a member of West Sussex County Council.

238. ITEMS NOT ON THE AGENDA THAT THE CHAIR OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair confirmed that there were no urgent items to consider at this meeting.

239. PUBLIC QUESTION TIME

The Chair invited questions from a member of the public who had submitted their questions in advance of the meeting in accordance with the rules of the Council's Constitution.

The Chair confirmed that seven questions had been submitted from Ms Thompson and these were read out by the questioner and responded to by the Chair.

(A schedule of full questions asked, and the responses provided can be found on the meetings webpage [here](#)).

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240. BUDGET 2025/26 PROCESS

The Group Head of Finance and Section 151 Officer was invited by the Chair to present the report that set out the budget process for 2025/26. The report outlined the key service committee dates and explained the process was driven by the medium-term financial report to the Policy and Finance Committee on 24 October 2024. Briefings would be held with members throughout the budget process with dates to be confirmed.

The Chair then invited questions and comments from members. In response to a question concerning the increasing demands on service delivery referred to at paragraph 4.2 of the report, the Group Head of Finance and Section 151 Officer explained that the greatest challenge to the Council was the cost of providing homelessness provision. This provision would be a cost pressure for this year and next year due to the increasing demand, and measures were being taken to control these costs. A further pressure was uncertainty surrounding the Council's income levels being reduced following the Local Government Finance settlement for 2024/25, which had announced the discontinuation of the New Homes Bonus (NHB) and implied removal of the Minimum Funding Guarantee Grant (MFGG). He provided details of a Joint Finance officers briefing where local government finance experts had advised there had not been any national discussions on the Government's plans on the removal of the NHB and MFGG, which would not be known until the Local Government Finance settlement for 2025/26 was announced at the end of the year. If they were removed they were likely to be removed gradually.

A member welcomed member briefings during the process and asked that officers give members ample notice of them.

The Committee noted the Budget process for 2024/25 as outlined in the report.

241. BUDGET MONITORING REPORT TO 30 JUNE 2024

The Group Head of Finance and Section 151 Officer was invited by the Chair to present the report. He referred to the Quarter 1 2024/25 forecast at Table 1, paragraph 4.2, which set out a small underspend of £50k. Salary costs were forecast to underspend by £200k but would be largely offset by the recruitment of external professionals filling staff vacancies. Referring to the Community Infrastructure Levy (CIL) income, the Council was able to recover some of its costs from CIL receipts with the forecast predicting an overachievement of £70k. Following the deletion of a number of staff posts in the 2024/25 budget the Council was on target to meet those savings.

The Chair then invited questions and comments from members. A question was asked whether the reduced number of applications being received would lead to less income being received by the Council. The Group Head of Finance and Section 151 Officer responded that the variation related to the cost recovery for CIL receipts. He referred to the substantial planning fee increases announced by the Government in December 2023 and advised that the Council had exercised caution in factoring any increase in income in the budget, as the effect on the number of planning applications

received as a result were not known. The effect on the current budget will be monitored throughout the year and any increase or reduction in the number of planning applications received will be factored in to the 2025/26 budget process.

The Interim Head of Planning Policy provided details of the comments received from Financial Services to the National Planning Policy Framework consultation, that noted that if the householder planning application fee was increased to £528 it could potentially generate a fee income of up to £150k additional income. It was too early to know what the implications would be as the new fees had not been ratified. The Group Head of Planning explained that staffing levels were managed according to the amount of planning income received.

The Committee noted the report.

242. DRAFT FINAL OUT-TURN - 2023/24

The Group Head of Finance and Section 151 Officer was invited by the Chair to present the report. He advised that the figures contained in the draft 2023/24 draft final outturn report were subject to external audit. He referred to an overspend of £251k, which was an improvement on the level predicted at Quarter 3, the details of which were set out in paragraph 1. Although Planning services income had underachieved by £377k the position had improved during Quarter 4 due to an overachievement following an increase in Community Infrastructure Levy receipts.

The Committee noted the report.

243. CIL INFRASTRUCTURE INVESTMENT PLAN (IIP 2025-2027)

[Councillor Elkins re-declared his Personal Interest as a member of West Sussex County Council during discussion of this item]

The Interim Head of Planning Policy was invited by the Chair to present the report that provided an update to the Council's three-year Infrastructure Investment Plan 2025/27 (IIP). He drew attention to the Priority Shortlist that set out the recommended projects to be taken forward for funding allocations in the three-year period and the updated Baseline Longlist. A total of five projects had been identified to receive Community Infrastructure Levy payments from the strategic pot.

Details of the five projects for consideration were provided:

- Existing Littlehampton Waste Recycling Facility capped to actual receipts in Year 3 within the WSCC 70% pot;
- Existing project at Littlehampton Fire Station - Relocation or redevelopment (allocation Year 1 £50k; Year 2 £50k; Year 3 £0k and capped to actual receipts in Year 3 within WSCC 70% pot);
- Existing project for Route 8 Arundel to Ford Active Travel - allocation reduced to Year 1 £100k within ADC 20% pot – future funding subject to National Highways Designated Funds Review 2025; It was noted that officers will be giving further consideration to this allocation and whether it should

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continue to come out of the Arun District Council funding pot or if it was more appropriate to come out of the West Sussex County Council funding pot.

- Add existing project at Lion's Den Littlehampton – Play area improvements - £30k within ADC 20% pot;
- Add new project at Ferring Village Play Area – Play area improvements - £30k within ADC 20% pot.

It was noted that projects came forward ad hoc throughout the year and advised that officers will consider providing a more structured timetable of bidding rounds for each year.

The recommendations were then proposed by Councillor Partridge and seconded by Councillor Lury.

The Chair invited the Committee to make comment and ask questions.

- The Interim Head of Planning Policy responding to member questions clarified the position concerning the project for Route 8 Arundel to Ford Active Travel, confirming that it was not the intention to ask West Sussex County Council for an additional contribution. The project had initially included the green link that had included links to Arun District Council's proposals for a leisure route in the same location. The Council had sought external funding for the route but as it had not been successful the project had been paused. The £100k of funding sought was for a further feasibility study for non-motorized users with consideration being given to whether it would be more appropriate for the funding to be ring fenced from the County Council 70% strategic pot or if the smaller Arun District pot would be more appropriate. National Highways had advised that funding for the travel route from Ford to Littlehampton was not available in its current Road Investment Strategy (RIS2). He referred to the number of road improvement schemes that had been cancelled and that it was hoped that the unspent funding would be put towards sustainable transport projects, but this would not be known until RIS3.
- The lack of an active transport route between Chichester and Pagham was highlighted. Members were reminded of the current consultation on proposals for a scheme between Chichester and Bognor Regis that included improving cycle links.
- A member referred to the length of time involved in the implementation of the Littlehampton Fire Station replacement project, which should be considered a priority. The Interim Head of Planning Policy advised that the County Council have approached officers to see if the funds could be released earlier if they were to bring the feasibility work forward.
- A member advised of the increased train timetable this year, affecting the Ford Road level crossing project on the Baseline longlist. The effects of the any additional level crossing closure times, due to the additional trains, should be taken into account as part of any feasibility studies concerning this project. The Interim Head of Planning Policy advised that this would be taken into account as the project progressed under future funding rounds.

- Concern was raised regarding the further erosion of the Green Link project, which would have provided leisure and commuter access from Arundel to Littlehampton. Although it was understood that the rising sea levels along the River Arun was an issue to obtaining external funding. The move to prioritising the provision of a more northerly route to the south of Ford linking to the A259 was welcomed. Will the allocated funds for additional feasibility be used to confirm the engineering constraints? Can the Council consider a more westerly route linking the cycle routes along the A259? The Interim Head of Planning Policy advised that following a meeting with partners on active travel routes his understanding was that the £100k earmarked for feasibility would look at detailed interventions in priority order. As regards to the provision of an alternative route, the Council could put forward suggestions for consideration under the future feasibility.
- Responding to a question concerning the length of time that Baseline Longlist projects took to be implemented, the Interim Head of Planning Policy provided details of the process and advised that projects would be brought forward once they had reached the stage where they were ready to be implemented.
- The Interim Head of Planning Policy confirmed that the Lion's Den, Littlehampton and the Ferring Village Green play area Priority Shortlist projects would provide new infrastructure improvements, as required by the CIL regulations, and not replacing like for like.
- Disappointment was expressed that following the Infrastructure Investment Plan 2025/27 update the NHS had not provided any updates on progress with their projects, especially as there was money available to improve the health of residents. Both the Interim Head of Planning Policy and Group Head of Planning had discussed the lack of progress and would be seeking a meeting with senior NHS officers with the intention of progressing their projects.
- It was suggested that the NHS could be asked to attend a meeting of the Planning Policy Committee to provide details of their future delivery plans for health care provision in the District.
- The Director of Growth responded to a comment about the lack of joined up infrastructure linking the cycle route projects in the District. He provided details of the Arun Active Travel Study (AATS), similar to a Local Cycle and Walking Infrastructure Plan (LCWIP), that had assessed a range of cycling options. He explained that the Ford strategic allocation set out numerous requirements to upgrade cycle links from that development to Ford Railway Station and the River Arun. He explained that as the Ford housing development took place the funding would be available for cycling provision south of the Railway Station. Provision of a cycle link to Arundel from the Railway Station was an issue as there were no large developments in that area to fund it. In response a member advised they were aware that none of the proposals in the Study had been delivered and suggested that the AATS should be replaced by a LCWIP, as these were in line with national consensus and could result in more successful projects in the future. The cycling upgrades in place as part of the Ford development were not in line

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with cycle infrastructure design LTN1/20 or cycling infrastructure best practice and was a missed opportunity.

- The Group Head of Planning undertook to provide details of the latest position concerning the Ford Road Level Crossing project and the provision of a railway crossing road bridge and details of who was responsible for the Route 12: Active travel route (safe cycling) Aldwick Region cycling route project, outside of the meeting.

The Committee

RECOMMEND TO FULL COUNCIL that

The Arun Infrastructure Investment Plan (for the period 2025-2027) be agreed by Full Council before publication on the Council's website.

244. INFRASTRUCTURE FUNDING STATEMENT (IFS) 2023/2024

The Interim Head of Planning Policy was invited by the Chair to present the report which updated the Committee on the Council's annual Infrastructure Funding Statement (IFS). He explained that West Sussex County Council and neighbourhood bodies will carry out their own Infrastructure Statement in terms of their Community Infrastructure Levy (CIL) and Section 105 receipts. The number of CIL demand notices issued, of £4.5m, was significantly higher than the previous year. The increase in CIL receipts when compared with the previous year (£2.1m compared with £800k) and S106 receipts (£12.m compared with £2.5m) and what the money has been spent on were highlighted. The number of new affordable dwellings provided under S106 has increased from 395 to 607 this year.

The recommendations were then proposed by Councillor Partridge and seconded by Councillor Tandy.

The Committee

RESOLVED that

The Arun Infrastructure Funding Statement 2023/24 be noted and published on the Arun District Council website, in accordance with Regulation 121A of the Community Infrastructure Regulations 2010 (as amended).

245. ARUN SECONDARY SCHOOL STUDY UPDATE

[Councillor Elkins re-declared his Personal Interest as a member of West Sussex County Council during discussion of this item]

The Interim Head of Planning Policy was invited by the Chair to present the report. The report provided an update on the progress officers have made with landowner engagement concerning the potential site options for an Arun Secondary

School. He referred to paragraph 4.5 that provided details of each landowner's response, which was either that the landowner did not want their site to be considered or no response was received. It did not necessarily mean that the necessary work on potential sites could not progress, as they all met the necessary criteria for a new secondary school. It was noted that the Council had Compulsory Purchase Order (CPO) powers should it wish to allocate a site or if a planning application was received for a site. Paragraph 4.9 set out the further detailed investigative work to be commissioned to identify a suitable site. He referred to the decision made by the Committee at its meeting held on 30 January 2024 not to support Site Option F as a preferred site. However, officers suggested that members may wish to re-consider and agree to include this site alongside the five sites to be progressed under the further Site Constraints Study. The results of the feasibility work will be reported to the Committee. If further sites did come forward they would also be considered. Following the further detailed work to be undertaken by the Council in consultation with West Sussex County Council a final preferred site will be brought to the Committee for consideration.

The recommendations were then proposed by Councillor Bower and seconded by Councillor Partridge.

The Chair invited the Committee to make comment and ask questions:

- The Interim Head of Planning Policy clarified that the location of Site Option F was in Ford. He reminded members that West Sussex County Council had been in discussions with the landowner of this site but no land deal had been agreed as yet.
- A member asked if Academy Trusts had been approached concerning the sponsorship of a new school in Arun. The Group Head of Planning replied that West Sussex County Council would expect the site identification process to have taken place in the first instance, which was an important stage of the process, before they will discuss proposals with the school providers.
- Responding to a question regarding the use of a CPO, the Group Head of Planning explained that this process would only be used by the Council to acquire land for a suitable site only if all other avenues had failed. Before starting the process in the first instance some certainty would be required in the form of a school site allocation or a planning permission coming forward.
- A comment was made that it was disappointing to see West Sussex County Council, who were landowners and had the responsibility for delivering secondary schools, were not putting any site proposals forward in Arun. Given the known insufficient availability of secondary school placements in Arun, could the Council address this in its housing number constraints assessment would this be a viable option to include within the housing number targets to work towards a reduction? The Group Head of Planning explained that although this constraint was proving difficult it was not insurmountable. The Council would have to prove that there was no prospect of a scheme coming forward.
- A member urged for a secondary school to be found in Arun otherwise the Council would be doing a disservice to those pupils who had to travel to schools elsewhere.

Planning Policy Committee - 26.09.24

- In response to a comment made regarding the lack of infrastructure being built following strategic development, the Group Head of Planning advised that the details for the provision for a new school were set out in the Council's Infrastructure Funding Statement. All strategic allocations made financial contributions towards a new secondary school which would build up until enough funds were received to provide a new secondary school.
- A further comment was made concerning the impact on pupils if a new secondary school site was not delivered and the need to move the process forward following the delays in finding a suitable site.

The Committee

RESOLVED

- i. That the Council will progress a further detailed Site Constraints Study at a cost of circa £30K to include the five sites agreed by Planning Policy Committee of 30 January 2024 (Site 14: Site to the South of Yapton; Site 5: Land South of Yapton Road; Site 4: Land North of Yapton Road and East of Blossom Way; Site 3: Land at Maypole and North End Road and Site 2: Choller Farm, Barnham Lane) plus Site F from the 2019 Study (land adjacent to the Ford Allocation). Additional sites will be added to this list if alternative opportunities emerge before the report is complete.
- ii. That following the further detailed work and consultation with West Sussex County Council, officers are to report back to this Committee at a future meeting, with the final preferred site for the Secondary School, so that formal legal processes can be commenced by a Council.

246. LOCAL PLAN UPDATE DIRECTION OF TRAVEL - CONSULTATION RESPONSE

The Interim Head of Planning Policy was invited by the Chair to present the report. He provided details of the public consultation on the Direction of Travel (DoT) document that had taken place following approval by the Committee. The consultation set out a vision and objectives, and asked respondents if they considered that the Council was considering the correct issues in the DoT. A good response had been received with 73 respondents, of which there were 299 specific comments. The comments received mainly related to three key areas: providing homes in the right places, climate change and the need to deliver infrastructure to support growth. The results of the consultation will be used to develop the next stage of the Local Plan for which evidence and preparatory work has already commenced. During the process, there will be extensive engagement with members via direct consultation and through the committee process. The detailed responses to the consultation were available on the Council's website for viewing.

The recommendations were then proposed by Councillor Lury and seconded by Councillor Partridge.

The Chair invited the Committee to make comment and ask questions.

Councillor Lury referred to the Special Planning Policy Committee held on 18 September 2024 and the Committee's agreement to send a letter to the regarding the proposed changes to the National Planning Policy Framework (NPPF). He advised that the letter, signed by the Group Leaders, had been sent and advised that the letter had been copied to the four Arun MPs and to the press. He thanked the Group Head of Planning for his assistance and the Group Leaders for supporting the letter.

In response to a comment made that due to the proposed changes to the NPPF the DoT document should be reviewed due to the unknowns that the new planning system will bring and whether or not the Council should continue to prepare a new Local Plan. The Group Head of Planning advised that both this Committee and the Council was committed to continue preparing a new Local Plan under the current planning system, as the changes to the new system were not yet known and was progressing its evidence-based work in the meantime.

The Committee

RESOLVED

- i. That the summary of the consultation responses is noted and that the consultation responses do not cause any issues which prevents officers from progressing onto the next stages of the Local Plan Update, and
- ii. That the contents of the consultation comments will be used, where relevant, to inform the next stage of Local Plan evidence base work.

247. THE THREE HARBOURS STRATEGY 2024-2028

The Interim Head of Planning Policy was invited by the Chair to present the report. He explained that the Council had recently become aware of the Three Harbours Partnership and its draft Strategy for 2024-2028 at a late stage. Notwithstanding this, officers have assessed the Strategy in terms of water quality, diversity and carbon capture that were broadly in line with the Council's climate change emergency and its ambitions in terms of carbon reduction and improvements to the environment. Officers had assessed the Council's involvement and were of the opinion that the best way forward would be for the District Council to become a signatory to the Partnership to include member involvement. He drew attention to paragraph 4.6 that set out the 10 key inputs envisaged by 2028 in the high-level plan.

The recommendations were then proposed by Councillor Huntley and seconded by Councillor McAuliffe.

The Chair invited questions and comments from members. Comment was made that although the opportunity to become a member of the Partnership was belated it was welcomed due to the significant importance of the three harbours.

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A member expressed the view that a member representative should be appointed to represent the Council on the Chichester Harbour Conservancy if there was not already a member appointed to this outside body.

The Director of Growth clarified that the Three Harbours Partnership and Sussex Bay Project were two distinct projects although there was synergy between them. Officers were working with the Sussex Bay Project and at the same time, albeit belatedly, the Council was getting involved with the work of the Three Harbours partnership. The Interim Head of Planning Policy added that the Partnership's proposed integrated recovery plan would map all its projects. The engagement strategy proposed working groups and a standing citizens' assembly providing greater involvement and collaboration. Officers undertook to provide Councillor Goodheart with further information surrounding citizens' assemblies.

Members welcomed the opportunity to join the Three Harbours partnership and become a formal signatory to the Strategy.

The Committee

RESOLVED that the Committee

- i. Consider the Final Draft of the Three Harbours Strategy document (2024-2028); and
- ii. Agree that Arun District Council should join the Three Harbours partnership and become a formal signatory to the Strategy.

248. WORK PROGRAMME

The Interim Head of Planning Policy advised that since the publication of the agenda a number of updates had been made to the work programme. He undertook to circulate the latest version to the Committee following the meeting.

The Committee noted the work programme for 2024/25.

(The meeting concluded at 8.01 pm)

REPORT TO:	Planning Policy Committee – 28 November 2024
SUBJECT:	Southern Water Revised Draft Water Resource Management Plan Consultation (11 September - 4 December 2024)
LEAD OFFICER:	Zac Ellwood (Interim Head of Planning Policy)
LEAD MEMBER:	Cllr Gill Yeates (Chair of Planning Policy Committee)
WARDS:	All
CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:	
<p>The recommendations support:-</p> <ul style="list-style-type: none"> • Supporting our environment to support us; and • Delivering the right homes in the right places. 	
DIRECTORATE POLICY CONTEXT:	
<p>The proposed response to this consultation will contribute towards protecting the district’s natural environment assets and promote economic growth in a sustainable manner, striking the balance between the need for development and the protection of scarce resources.</p> <p>It will also contribute towards ensuring that buildings are safe, healthy, and sustainable for current and future generations, and to protecting public health by focusing our work on the quality of what we eat, where we live and work, the air we breathe and the land we stand on.</p>	
FINANCIAL SUMMARY:	
<p>The revised draft plan subject to consultation that is the focus of this report is not owned or under the responsibility of the council to produce, there are no current or foreseen direct financial impacts on Arun District Council.</p>	

1. PURPOSE OF REPORT

- 1.1. To update the Committee on the key messages from the current consultation on Southern Water’s revised draft Water Resources Management Plan 2024 (WRMP24), including any changes that may directly and indirectly affect Arun residents.
- 1.2. The WRMP24 is being consulted on from 11 September - 4 December 2024, following which Southern Water will publish a Statement of Response in early 2025. Subject to approval from DEFRA, Southern Water will then publish a final WRMP, including any changes that have been made as a result of the consultation.
- 1.3. The proposed response to this consultation is presented for consideration in Appendix 1.

2. RECOMMENDATIONS

2.1. Planning Policy Committee resolves to:-

- i. Agree the proposed response to the Southern Water WRMP24 (Appendix 1).

3. EXECUTIVE SUMMARY

3.1. The Committee may recall that a report on a number of draft Water Resources Management Plans (WRMPs) from various bodies (namely Water Resources South East, Southern Water, Portsmouth Water, and Icosa Water) was presented to the Planning Policy Committee on 26 January 2023. At that meeting, the Committee resolved that:

- a. The content of the Water Resources South East draft Best Value Regional Plan, the Southern Water draft Water Resources Management Plan, the Portsmouth Water draft Water Resources Management Plan and the Icosa Water draft Water Resource Management Plan, where they affect Arun District, be noted; and
- b. The proposed responses to the Water Resources South East draft Best Value Regional Plan; the Southern Water draft Water Resources Management Plan; the Portsmouth Water draft Water Resources Management Plan; and the Icosa Water draft Water Resources Management Plan be agreed.

3.2 Southern Water have now produced a revised draft Water Resources Management Plan 2024 updating their proposals for the region in which they operate. The WRMP24 is the subject of public consultation until 4 December 2024 and Arun District Council have been contacted and invited to comment. This report provides a brief overview of the revised plan. It considers any changes that are intended to apply within the district or that may impact future water supplies to its residents. Finally, it recommends a suitable response to the consultation on behalf of the council.

3.3 If, in the future, revised/updated WRMPs are received/consulted on from the other bodies mentioned at paragraph 3.1, these will be reported to Committee at the appropriate time.

4. SOUTHERN WATER REVISED DRAFT WATER RESOURCE MANAGEMENT PLAN 2024

4.1 Together with regional and other individual water companies, Southern Water consulted on its previous draft WRMP over the period 14 November 2022 - 20 February 2023.

4.2 Following further investigation into proposed projects, consultation feedback, updated guidance from regulators and new forecasts for population growth and climate change, Southern Water's draft WRMP was revised, hence this re-consultation. Representations are to be sent direct to DEFRA and copied to Southern Water.

4.3 The anticipated timeline following this re-consultation as stated by Southern Water, is as follows:-

2025

- Publish statement of response on WRMP24;
- Update and submit plan to the Secretary of State for the Environment;
- Publish Final WRMP; and
- Begin delivery of WRMP.

Overview

- 4.4 The WRMP24 sets out Southern Water's plan for how it will provide water, protect the environment, and sustain the economy for its customers for the period 2025 to 2075. It uses an adaptive planning approach which entails multiple scenarios of different combinations of growth, climate change and environmental ambition.
- 4.5 The WRMP24 maintains its focus on demand reduction alongside infrastructure updates, new sustainable sources of water and enhanced supply resilience as part of an adaptive approach. This is integrated with the Water Resources South East Regional Plan, hence is part of a coordinated plan for the region.
- 4.6 The summary notes that the challenge is to leave more water in the environment to protect some of the most sensitive habitats, while at the same time securing supplies for one of the fastest growing populations in the UK and preparing for the increased risk of drought due to climate change.
- 4.7 Southern Water acknowledges that significant action is needed now to invest in and create new robust, resilient and less weather-dependent water supplies, as well as finding new ways to use existing supplies more wisely. The WRMP24 says they will be harnessing the benefits of new technology, such as smart meters for customers, which will enhance better understanding of water use and help find more leaks to reduce consumption. They are committed to reaching Government targets on reducing water use five years ahead of the national deadline.
- 4.8 The WRMP24 also identifies a need to invest significantly in large-scale infrastructure such as new reservoirs and transfer pipelines to capture and transfer more of the rain which falls in the region. They plan to use cutting-edge technology to generate new sources of drinking water – using treated wastewater for reliable drinking water supplies (water recycling) and converting seawater into drinking water (desalination). Transfers of water from other new developments in the South East have a vital role to play and they say they are working closely with other regional water companies on long-term plans.

Detail

4.9 The key headline ambitions set out in the WRMP24 are as follows:

- **Leakage reduction:** Using new technology such as sensors in networks, analytics using AI and replacing old water mains to reduce leakage.

- **Water usage reduction:** Aiming to reduce daily average dry year water use to 110 litres per person by 2045, which is equivalent to 100 litres per person in a normal year.
- **Non-household water use:** Targeting a 9% reduction in non-household water use by 2038.
- **Water recycling:** Implementing four schemes by 2035 to turn treated wastewater into purified recycled water that can be used as a source for drinking water supplies.
- **Pipeline expansion:** Increasing pipelines to transfer water from new sources.
- **Groundwater sources:** Improving existing groundwater sources and developing new ones.
- **Desalination:** Planning four schemes after 2035 to provide drinking water from seawater.
- **New reservoir:** Constructing a new reservoir in Sussex.
- **Water storage:** Storing water from the River Test in Hampshire underground.
- **Partnerships:** Collaborating with land users and environmental groups to improve water sources, for example through the [Catchment First](#) and Catchment Resilience programmes.
- **Resilience measures:** Short-term measures to protect Hampshire's rivers during droughts until longer-term infrastructure is developed and operational.
- **Drought permits/orders:** Planning to end the use of supply side drought permits and drought orders by 2040-41.

4.10 Turning to specific targets, Southern Water aims to reduce leakage by 53% by 2050, which is greater than the 50% reduction target set by the government. They state this will be achieved through enhanced leak detection and repair, using both conventional and new technologies as well as replacing old pipes that tend to leak more frequently.

4.11 The Sussex Coast desalination option has been removed, as a suitable alternative site could not be identified when the site at Shoreham Harbour became unavailable. This was addressed in Arun's comments on the previous consultation.

4.12 The WRMP24 includes updated population and housing growth forecasts based on projections from local authority housing plans and data from the Office of National Statistics. The Committee will be aware that revisions to the National Planning Policy Framework propose mandatory housing targets for each council, which will significantly increase housing requirements. If these targets are introduced, Southern Water will need to further update their population growth forecasts.

Implications for Arun

4.13 Relevant changes to the WRMP24 for Arun District include:-

- Extension of the earliest delivery date for the Littlehampton Water Recycling Scheme from 2027 to 2030, to allow contingency for any planning, consenting and construction challenges. The council hopes that this allows for greater engagement with all affected landowners and stakeholders.

- Retention of the desalination option for Tidal River Arun, with earliest delivery delayed from 2033–34 to 2037–38 to allow for investigation and mitigation. Costs have been increased following a review of the engineering scope. The council maintains that a location on either side of the tidal River Arun for a desalination plant is unlikely to be feasible or acceptable given commitments and allocations in the Adopted Arun Local Plan, hence the need for effective engagement on this specific matter.

4.14 The overall costs of the WRMP24 are projected to increase customer bills on average each year by £53 between 2025 and 2030, £136 between 2030 and 2035, and £181 between 2035 and 2040.

Conclusion

4.15 As Arun is in a water stressed region, there is support for the demand side actions and intended reductions in leakage. The final WRMP must, however, take proper account of population projections and the government's drive to deliver more housing, which will only increase demand.

4.16 Whilst the proposals for increasing water supply are broadly supported, clarity is required around the need for and location of the proposed desalination plant, and the plans for water recycling at the Littlehampton Works. Effective engagement with all stakeholders on these proposals is accordingly critical, more so as the council embarks upon the review and update of the Arun Local Plan.

5. CONSULTATION

5.1. An internal consultation has been carried out with the council's Engineers to inform the potential responses.

5.2 An email informing of the current consultation, together with a copy of the summary document, was set to all Arun Ward Councillors by the Interim Head of Planning Policy on 13 September 2024.

6. OPTIONS / ALTERNATIVES CONSIDERED

6.1. To consider and respond to the consultation and where necessary take account of its content, through any necessary integration into strategies or plans that the council may create.

6.2. To note the consultation but not to incorporate its content where needed or formally respond at this stage. This option was discounted on the basis that ensuring a robust and continued water supply to existing and future residents is considered key to effective planning for the district and is a matter on which the Planning Policy Committee should be informed.

7. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER

- 7.1. The report is being produced by Southern Water on how they plan to provide water, protect the environment, and sustain the economy for its customers for the period 2025 to 2075, therefore there are currently no foreseen financial implications from the content of this report. Officer time is funded from existing service budgets.

8. RISK ASSESSMENT CONSIDERATIONS

- 8.1. By responding to the consultation, the council may be able to influence the form of the final plan. Not doing so may open risk of future issues with water supplies and connected infrastructure affecting development and the residents of Arun.

9. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER

- 9.1. As a consultee and stakeholder there are no direct legal or governance implications for the council.

10. HUMAN RESOURCES IMPACT

- 10.1. There are no direct human resource impacts for the council.

11. HEALTH & SAFETY IMPACT

- 11.1. There are no direct health and safety implications arising from this report's recommendations.

12. PROPERTY & ESTATES IMPACT

- 12.1. There are no direct implications for property and estates from the content of this report.

13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE

- 13.1. The council is a consultee and the document being consulted on is the responsibility of another organisation, hence there are no direct implications for the council regarding equalities.

14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE

- 14.1. There will be no direct impacts to the environment as the council is only a stakeholder on the plan. It is hoped that overall, due to the plan being around ensuring water supplies into the future, there will be a positive improvement to the natural environment, as well as living conditions of residents.

15. CRIME AND DISORDER REDUCTION IMPACT

- 15.1. There are no implications from this report on crime and disorder.

16. HUMAN RIGHTS IMPACT

16.1. No human rights would be impacted by this proposal.

17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS

17.1. As the council is purely responding to a statutory consultation being carried out by another statutory body, there are no direct implications in terms of data protection.

CONTACT OFFICER:

Name: Victoria Hobday
Job Title: Senior Planning Officer
Contact Number: 01903 737790

BACKGROUND DOCUMENTS:

1. Southern Water's [revised draft Water Resource Management Plan consultation](#)

Appendix 1: Proposed ADC Response to Southern Water's draft revised Water Resource Management Plan 2024



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West Sussex BN17 5LF

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Water Resource Management Plan Consultation
(Southern Water)
Department for Environment, Food and Rural Affairs,
Water Resources,
Seacole, 2 Marsham Street,
London SW1 4DF

29 November 2024

Please ask for:

Your Ref:

Neil Crowther
Growth

Our Ref:

Direct Line: 01903 737839

Dear Sir/Madam

Consultation on Southern Water's revised draft Water Resource Management Plan 2024

Thank you for the opportunity to comment on the documents forming the consultation on the Southern Water revised draft Water Resource Management Plan 2024 (WRMP24).

Arun District Council (Arun) welcomes strategic long-term planning and investment for infrastructure and for securing resources for a sustainable future in the face of the impacts of climate change, alongside the need to deliver economic growth, housing, and prosperity for existing and future generations.

Arun supports the proposed measures to reduce leakage from the network through the reintroduction of a more ambitious target for reducing per capita consumption by household customers to 110l/h/d under dry conditions by 2045, as this will facilitate greater resilience to the impacts of climate change by communities and prevent harmful impacts to sensitive designated nature sites.

In respect of population and housing growth forecasts, Southern Water should be aware of proposed revisions to the National Planning Policy Framework. These include mandatory housing targets for each local authority which will significantly increase housing requirements across the board. If these enhanced targets are introduced, Southern Water will need to reassess its population growth forecasts much earlier than the draft WRMP29.

Arun welcomes the extension of the earliest delivery date for the proposed water recycling scheme at the Littlehampton Wastewater Treatment Works (WTW) at Ford from 2027 to 2030. It is hoped that this will allow for greater engagement with all relevant stakeholders, including landowners and developers whose land will be affected. Arun is aware that Southern Water only controls the land immediately around the treatment works, while the surrounding lands form part of a strategic housing site in the adopted Arun Local Plan 2018, which has outline approval. Accordingly, mitigation of issues, particularly odour and noise, should be incorporated into the planning and delivery of the scheme.

Arun notes the removal of the proposed Sussex Coast desalination option. Regarding the retained desalination option for tidal River Arun, it is considered that siting of such a facility within Arun District is unlikely to be feasible or acceptable for a number of reasons, including:-

- Strategic allocations e.g. the Littlehampton Economic Growth Area and West Bank development within the adopted Arun Local Plan 2018;
- Sites of importance for nature conservation around West Beach (e.g. Climping SSSI and Arun Valley SPA);
- Important open landscape / strategic gaps between Littlehampton and Middleton-on-Sea, and Littlehampton and Arundel;
- Substantial risk of flooding along the River Arun; and
- The potential landfall siting of the proposed Rampion 2 pipework.

These and other land use considerations are detailed in Arun's [Local Plan and policy maps](#).

There is also a lack of certainty around the need for the tidal River Arun desalination option, given that it appears in only two of the nine supply-demand scenario options. Whilst Arun appreciates that Southern Water's adaptative planning approach seeks to manage such uncertainty, Arun is at the preliminary stage of reviewing its Local Plan to cover the period 2023 to 2041. Accordingly, the council looks forward to proactive engagement around the planning for this facility so that it can be appropriately considered.

Arun recognises that the WRMP24 is geared towards actions to tackle demand reduction and efficiency (e.g. metering and design standards) and leakages in the network. Together with key infrastructure investments, including those cited above, these have significant cumulative long term cost implications at a time of inflation and cost of living pressures that may persist. Arun therefore supports emphasis on best value measures that are flexible, equitable and low cost to prevent excessive additions to customer bills.

In summary, whilst Arun District Council is broadly supportive of the WRMP24 and the proposed supply side options that may impact the district, early and effective engagement is considered to be critical, particularly in respect of the plans for the Littlehampton water recycling scheme and the desalination plant on the tidal River Arun.

If you wish to discuss the contents of this letter, or if there is anything you do not understand, please contact me.

Yours sincerely

Neil Crowther
Group Head of Planning – Growth Directorate
Arun District Council

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REPORT TO:	Planning Policy Committee – 28 November 2024
SUBJECT:	Brownfield Land Register 2024
LEAD OFFICER:	Zac Ellwood (Interim Head of Planning Policy) Victoria Hobday (Senior Planning Officer)
LEAD MEMBER:	Cllr Gill Yeates (Chair of Planning Policy Committee)
WARDS:	All wards
CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:	
The recommendations support:-	
<ul style="list-style-type: none"> • Improving the wellbeing of Arun; • Delivering the right homes in the right places. 	
DIRECTORATE POLICY CONTEXT:	
The proposals will help to enhance the quality of the natural and built environment, protect the district’s natural and heritage assets and to promote economic growth in a sustainable manner, striking a balance between the need for development and the protection of scarce resources.	
FINANCIAL SUMMARY:	
The Brownfield Land Register is a record required to be updated at least annually under Government legislation, costs are met within existing budgets with any additional costs borne from Brownfield Land Grants.	

1. PURPOSE OF REPORT

1.1. To update the Committee on Arun’s’ Brownfield Land Register 2024 and any changes to it since it was published in 2023. The Brownfield Land Register (BLR) will then be published and used as the basis for the annual BLR statistical return to Government (in a prescribed format) required by national legislation.

2. RECOMMENDATIONS

2.1. That Planning Policy Committee resolves to:-

- i. Note the 2024 Brownfield Land Register (Part 1); and
- ii. Keep the Brownfield Land Register under review regarding preparation of a (Part 2) register and ‘permission in principle’ (including the carrying out of consultation and publicity requirements), should any suitable sites be identified, in accordance with the Town and Country Planning (Brownfield Land Register) Regulations 2017 (as amended).

3. EXECUTIVE SUMMARY

- 3.1. The production of a BLR is a statutory requirement under the Town & Country Planning (Brownfield Land Register) Regulations 2017 (as amended). The Register is to be established in two parts (i.e. Part 1 and Part 2 - explained below) and is to include all brownfield sites that are suitable for residential development. The Register is to be updated at least annually.
- 3.2. This report provides an update to the Register published for 2023. There are 24 sites on the 2024 BLR (previously there were 19), including 9 new sites which meet the criteria and have been identified for addition and 4 sites which have been removed because they have either been implemented or are no longer available for development.

4. ARUN BROWNFIELD LAND REGISTER 2024

- 4.1. The Town & Country Planning (Brownfield Land Register) Regulations, 2017 introduced a duty for Local Planning Authorities (LPAs) to prepare, maintain and publish a register of brownfield land suitable for residential development within their areas.
- 4.2. BLRs must be kept in two parts. Part 1 establishes a baseline stock of 'brownfield land' which meets specific previously developed land and delivery criteria (as described below). Part 2 introduces permission in principle (PiP) as a new route to obtaining planning permission for Part 1 sites that meet eligibility criteria, to make it onto Part 2 of the Register where this may help to boost the supply of housing.
- 4.3. The BLR follows a standardised format and is made available nationally, improving the quality and consistency of data held by councils, providing greater certainty for developers and communities while encouraging investment in local areas.
- 4.4. To be included on the BLR, brownfield land must meet the definition of "previously developed land" set out in Annex 2 of the National Planning Policy Framework (NPPF 2023).
- 4.5. Brownfield sites included within Part 1 of the BLR are required to meet the following criteria:-

Size: The site must be 0.25 hectares or larger, or capable of supporting at least 5 dwellings;

Suitable: Sites are considered suitable for inclusion on the register if the land is allocated in a development plan document (e.g. a Local Plan), has planning permission or PiP for residential development. The land may also be included on the register if the LPA considers it appropriate for residential development having considered any adverse impact on the natural environment; the local built environment, including heritage assets in particular; local amenity; and any relevant representations received (i.e. from third parties);

Available: Sites are considered to be available for development if either all the owners of the site, or the developer in control of the land, have expressed an intention to sell or develop the site, and not more than 21 days before the entry date on the register, there is no evidence indicating a change to that intention. In addition, the LPA must be satisfied that there are no ownership or other legal matters that might prevent residential development taking place, having regard to information publicly available on the date of assessment and any relevant representations received.

Achievable: Sites are considered to be achievable if, in the LPA's opinion, development is likely to take place within 15 years of the entry date, having regard to publicly available information and any relevant representations received.

4.6. The methodology for selecting and classifying the schedule of sites is set out in the Arun Part 1 Brownfield Land Register November 2024 document (Background Paper 1) published on the Council's web site. Sites are identified from available monitoring sources and specifically, from the annual update to the HELAA.

4.7. The key findings for Part 1 can be summarised as:

- There are 24 sites on Part 1 of the BLR 2024 in total (9 of these sites have extant planning permission).
- There are 9 new sites to be added to the BLR this year, as follows:
 - 20AB13 Arundel Police Station, The Causeway, Arundel,
 - BN2122PL The Hollies, 84 Barnham Road, Barnham,
 - 22BN1 Land at The Square, Barnham,
 - RU4 Sussex Business Village, Lake Lane, Barnham,
 - BR19 Regis Centre Site, The Esplanade, Bognor Regis
 - 24BR1 The Arcade, Bognor Regis,
 - BR23822 2-10 The Hatters Inn, Queensway, Bognor Regis,
 - 21AL3 SRC Recycling, Fontwell Avenue, Eastergate,
 - 46a & 47 Pier Road and land north of Clifton Road, Littlehampton.
- There are 4 sites to be removed from the BLR 2024 as development has started/been completed, or the site is not currently developable (NCD):
 - A1513 Chandlers BMW Site, Water Lane, Angmering,
 - NEWFG2 Land Rear of Henty Arms, Ferring Lane, Ferring (NCD),
 - LU5515OUT Land South of Littlehampton Academy, Littlehampton,
 - 18LU3 90 & 91 South Terrace, Littlehampton.
- No sites without planning permission meet the eligibility for progressing onto part 2 of the BLR and being given Permission in Principle;
- The sites on the register comprise some 13.35 ha (21.81 ha including Littlehampton - West Bank) and could potentially generate between 613 - 639 dwellings (1,003 - 1,259 including Littlehampton - West Bank) based on applications data.

4.8. The Council keeps the Part 1 BLR under review to determine whether there may be suitable sites that can be considered for inclusion in Part 2 of the BLR (i.e. given PiP). The Town and Country Planning (Permission in Principle) (Amendment) Order 2017 excludes sites from Part 2 where sites are; 'major development' (sites of 10 or more dwellings or 1 ha or more or 1,000 sqm or more commercial development); are subject to schedule 1 Environmental Impact Assessment or affect European Habitats or already have planning permission.

5. CONSULTATION

5.1. The BLR 2024 has been updated through interrogation of Council planning applications and other monitoring data sources, including consultations with Development Management colleagues. There is no requirement for any external public consultation on the BLR, which is a factual document and is formally published including nationally via a return to Government.

6. OPTIONS / ALTERNATIVES CONSIDERED

6.1. The following options are available:-

- To note and publish the Brownfield Land Register 2024 as evidence to support monitoring of housing supply and housing delivery; or
- Not to publish the Brownfield Land Register 2024 – however, this option has been discounted as it is a statutory requirement to update the register on an annual basis

7. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER

7.1. There are no financial implications as the BLR is updated and managed within existing resources and funding.

8. RISK ASSESSMENT CONSIDERATIONS

8.1. There are no adverse implications for the council or Arun communities arising from publishing the BLR.

9. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER

9.1. The BLR has been prepared in line with the Town & Country Planning (Brownfield Land Register) Regulations 2017 (as amended) which place a duty on LPAs to prepare, maintain and publish a register of brownfield land suitable for residential development and prescribe the way in which this should be carried out.

9.2. The Regulations require that Part 1 of the Register is updated at least once a year.

10. HUMAN RESOURCES IMPACT

10.1. There is no direct human resource impact for Arun District Council arising from the updating and publication of the BLR.

11. HEALTH & SAFETY IMPACT

11.1. There are no direct Health and Safety implications arising from this report's recommendations.

12. PROPERTY & ESTATES IMPACT

12.1. Arun District Council is freehold owner of part of the 17LU9 site, an area known as Littlehampton Marina (LM3037). Littlehampton Marina is demised by lease for a term of 125 years commencing 1971. Arun District Council is also the owner of 24BR1, The Arcade, Bognor Regis, and BR19, The Regis Centre, Bognor Regis. There are no other direct implications arising from the BLR for Council estate or property.

13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE

13.1. There are no direct implications for Arun District Council regarding equalities.

14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE

14.1. While there are no direct impacts of publishing the BLR, encouraging the reuse of previously land and property will help to conserve land, natural resources and reduce carbon emissions.

15. CRIME AND DISORDER REDUCTION IMPACT

15.1. There are no implications arising from the BLR for crime and disorder.

16. HUMAN RIGHTS IMPACT

16.1. There are no implications arising from the BLR for human rights.

17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS

17.1. There are no direct implications arising from the BLR in terms of data protection.

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BACKGROUND DOCUMENTS:

[Arun Brownfield Land Register 2024](#)

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Arun District Council

Brownfield Land Register (Part 1)

November 2024

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1.0 Introduction

- 1.1 The Government is seeking to maximise the numbers of new homes built on brownfield (also known as ‘previously developed’) land and make the most efficient use of land. The Town & Country Planning (Brownfield Land Register) Regulations 2017 (hereafter referred to as ‘the Regulations’) introduced a duty for local planning authorities (LPAs) to prepare, maintain and publish a register of brownfield land within their areas and where appropriate, introduced ‘Permission in Principle’ (PiP) as a new route to obtaining planning permission for these sites.
- 1.2 The aim of the Brownfield Land Register is to ensure standardised information and data about brownfield land that is suitable and available for residential development, is made accessible nationally and is kept up to date. The Government envisages that this will improve the quality and consistency of data held by LPAs, which will help to provide certainty for developers and communities, encouraging investment in local areas.
- 1.3 Brownfield Land Registers also offer the potential for granting PiP on suitable sites through allocation in a Part 2 register. Where sites are granted a PiP, it must then be followed by an application for Technical Details Consent (TDC) to agree the details of the scheme before obtaining full planning permission.
- 1.4 The sites on the Brownfield Land Register for Arun District Council have been included in accordance with the Regulations. Further information on the requirements is set out later in this document. It should be noted that Brownfield Land Registers include all brownfield sites that are suitable for residential development irrespective of their planning status. However, inclusion in Part 1 of the register does not automatically mean that a site will gain planning permission for residential use.
- 1.5 The Brownfield Land Register complements intentions set out in the National Planning Policy Framework (NPPF 2023) which encourage effective use of land in meeting the need for homes and other uses, including making as much use as possible of previously developed or ‘brownfield’ land. A consultation on proposed changes to the NPPF was published in July 2024 and, whilst the outcome of the consultation is still awaited, the draft document placed significant focus on the effective use of previously developed land (PDL) to help deliver the government’s ambitious new national housing targets. The consultation also sought views on potentially expanding the definition of PDL in the NPPF to include hardstanding and glasshouses and to redefine some previously developed land in the Metropolitan Green Belt as ‘Grey Belt’ land. The consultation does, however, carry only limited planning weight at the time this BLR is being produced (November 2024).

- 1.6 In addition, the strategy and policies of the adopted Arun Local Plan 2011-2031 seek to minimise impacts on the countryside and environment and encourage, where possible, development to make best use of available brownfield land and buildings, provided it is not of high environmental value.

2.0 **Brownfield Land Register Requirements**

Definition of previously developed land

- 2.1 ‘Annex 2 Glossary’ of the NPPF sets out the definition of “previously developed land” as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

The Planning Practice Guidance (PPG) confirms that in relation to the production of Brownfield Land Registers, LPAs must use the definition contained within the NPPF. Previously developed land is referred to as brownfield land. Sites must meet this NPPF definition to be included in the Brownfield Land Register.

- 2.2 Registers must be kept in two parts:

Part 1: Comprises all brownfield sites that meet the criteria set out in the Regulations. The LPA has assessed these sites as being appropriate for residential development. This list will include sites with current full planning permission, outline planning permission or PiP, which are non-implemented, as well as sites without planning permission that meet the criteria.

Part 2: Is a subset of Part 1. Part 2 will comprise only those sites in Part 1 where the LPA has decided that the land would be suitable for a grant of PiP for residential development. If a site is considered to be suitable for inclusion in Part 2, there are several steps that the legislation requires must be followed. If no sites are considered to meet the criteria for permission in principle, Part 2 of the register can be left empty.

- 2.3 Arun District Council will publish the Brownfield Land Register on the Council's website. This will be in the 'open data' spreadsheet format requested by the Government. It is a requirement of the Regulations that registers be reviewed at least annually to ensure that sites which no longer meet the criteria for inclusion are removed, and new sites are assessed and entered if appropriate. Windfall sites should be included in the register as part of this process where they meet the brownfield land criteria.

Criteria for inclusion in Brownfield Land Registers (Part 1)

- 2.4 Sites included within Part 1 of the Brownfield Land Register are required to meet the following criteria (as set out in Regulation 4 of the Regulations):-
1. **Size:** Sites must be 0.25 hectares or larger, or capable of supporting at least 5 dwellings;
 2. **Suitable:** Sites are considered suitable for inclusion on the register if the land is allocated in a development plan document (e.g. a Local Plan) or has planning permission or PiP for residential development. The land may also be included on the register if the LPA considers it appropriate for residential development having considered any adverse impact on the natural environment, the local built environment, including heritage assets in particular, local amenity and any relevant representations received (i.e. from third parties);
 3. **Available:** Sites are considered to be available for development if either all the owners of the site, or the developer in control of the land, have expressed an intention to sell or develop the site, and not more than 21 days before the entry date on the register, there is no evidence indicating a change to that intention. In addition, the LPA must be satisfied that there are no ownership or other legal matters that might prevent residential development taking place, having regard to information publicly available on the date of assessment and any relevant representations received; and
 4. **Achievable:** Sites are considered to be achievable if, in the LPA's opinion, development is likely to take place within 15 years of the entry date, having regard to publicly available information and any relevant representations received.

Brownfield Land Registers and Permission in Principle (Part 2)

- 2.5 The inclusion of a site on Part 1 of a register does not mean it will automatically be granted planning permission or PiP. It is, however, possible for LPAs to enter sites on Part 2 of the BLR which will trigger a grant of PiP. Sites suitable for residential-led development can only be included on Part 2 of the Brownfield Land Register after consultation and publicity requirements, and once other

procedures set out in the Regulations have been met, (including screening the site against the EIA requirements, if necessary), and the council remains of the opinion that PiP should be granted.

- 2.6 Sites listed on Part 2 of the Brownfield Land Register will be granted PiP for residential-led development. PiP will settle the fundamental principles of development (use, location, amount of development) for the brownfield site giving developers/applicants more certainty that development can come forward on the site. PiP will be granted for the provision of dwellings falling within the range specified in the relevant entry in Part 2 and for any non-residential development described in the entry.
- 2.7 A developer will not be able to proceed with development until they have also obtained Technical Details Consent (TDC). TDC will assess the detailed development design, ensuring appropriate mitigation of impacts and contributions to essential infrastructure are secured. Both the PiP and the TDC stages must be determined in accordance with the local development plan, the NPPF and other material considerations.

3.0 Arun District Council Brownfield Land Register

- 3.1 This section of the report comprises Part 1 of the Brownfield Land Register for Arun District Council, listing all sites considered to be suitable, available, and achievable for residential development in accordance with the criteria listed under Regulation 4 of the Regulations. The list includes sites that have already been granted full or outline permission. The list does not currently include any sites granted PiP and it should be noted that the Council does not intend to publish any entries in Part 2 of the Brownfield Land Register in 2024 but will review the register in 2025 to consider whether any grant of PiP would be appropriate at that time through inclusion in a Part 2 document. It should be noted that even though no sites are being proposed under Part 2 in this BLR, it is open to an individual/developer to submit an application for PiP at any stage, providing the statutory requirements are met.

Methodology

- 3.2 A key component of the evidence base for this work is the local authority's Housing & Economic Land Availability Assessment (HELAA), together with planning applications data and the Council's Local Plan evidence documentation. The HELAA presents a strategic picture of the availability and potential suitability of land within Arun District for development. Further, it attempts to establish realistic assumptions about the number of houses and amount of economic development that the land could yield and the timeframe within which this might come forward. HELAA data coupled with the 'Call for

Sites' and planning application activity in 2024 have been used to inform this 2024 update to the Brownfield Land Register.

- 3.3 The HELAA database was used as a starting point to identify sites for inclusion in the Arun Brownfield Land Register 2024. The Council has already established a method of identifying sites through the HELAA process and undertook a 'Call for Sites' in Summer 2024, which included an advert in the press, a council press release and promotion on the 'Call for Sites' web page, seeking sites for a range of uses including: housing; economic development; Brownfield Land Register; Gypsy & Traveller and Traveller Showpeople; leisure and tourism; and renewable energy. The 'Call for Sites' also enabled landowners and developers to provide up to date information for existing HELAA sites and promote new sites within the district.
- 3.4 The HELAA database was interrogated to identify all previously developed land over 0.25ha or considered suitable to potentially accommodate 5 or more units. This includes sites without planning permission, sites with planning permission that have not been implemented (as per paragraph 010 of the PPG). If a site has planning permission for 5 or more dwellings and meets the criteria set out in the Regulations, the site has been included. However, if brownfield sites under the size and quantity threshold are still suitable, available, and achievable for residential development, they may still be included in Part 1 of the register (as per Regulation 5 (3) of the Regulations and paragraph 018 of the PPG).

Assessment of Sites

- 3.5 The Council reviewed the list of existing HELAA sites to determine which sites are considered suitable, available, and achievable, against the requirements of Paragraph 4 of the Regulations.
- 3.6 Under the NPPF 2023 definition, to be considered **deliverable (DEL)**, 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 5 years. In particular:
- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
 - b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered

deliverable where there is clear evidence that housing completions will begin on site within 5 years.

- 3.7 Under the NPPF 2023 definition, to be considered **developable (DEV)**, 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.
- 3.8 In compiling the 2024 Brownfield Land Register, the following considerations were taken into account.

Sites including Greenfield and Brownfield Land

- 3.9 Greenfield (i.e. previously undeveloped) land is not appropriate for inclusion in the Brownfield Land Register. Where a potential site includes greenfield land within its boundary, the Council has considered whether the site falls within the definition of previously developed land in the NPPF (as set out in para 2.1 above). Only the brownfield element of any mixed sites should be included in Part 1 of the register.

Cross Boundary Issues

- 3.10 Brownfield sites that straddle local authority boundaries can be included in Brownfield Land Registers if they have been assessed against the relevant criteria. Currently, no sites spanning local authority boundaries have been identified for inclusion in the Arun Brownfield Land Register 2024.

Assessment of Site Suitability

- 3.11 In addition to the criteria set out in Regulation 4 which define site suitability, Regulation 14A (7) of the Planning & Compulsory Purchase Act 2004 (as amended by the Housing and Planning Act 2016) also requires that when preparing registers of land, LPAs must also have regard to:
- a) The development plan (including the adopted Arun Local Plan 2011-2031 and any 'made' Neighbourhood Development Plans);
 - b) National policies and advice (e.g. NPPF, PPG); and
 - c) Any guidance issued by the Secretary of State.

This means that in addition to the site suitability criteria set out in the Regulations, the policies in the adopted Arun Local Plan 2011-2031, 'made' Neighbourhood Development Plans and the NPPF and PPG are also relevant. Therefore, when considering sites for inclusion in the Brownfield Land Register a 'policy on' approach has been applied.

Register

- 3.12 The full list of the Council's Brownfield Land Register 2024 is set out in the table 'Part 1: Arun District Brownfield Land Register' below. The table includes sites which do not have planning permission (including allocated sites and sites within 'made' Neighbourhood Development Plans) and sites with planning permission which have not yet been implemented, at the time of this report preparation. Therefore, sites in the table with or without planning permission were either already identified in the HELAA and 'Call for Sites' or through planning application weekly lists data. It is important to note that the entries in the Brownfield Land Register (Part 1) include HELAA references to enable cross-referencing. Each site within the table includes a justification as to why it has been included in the 2024 Brownfield Register (Part 1).
- 3.13 Maps for the brownfield sites without planning permission have been produced and are accessible via the [Council's website](#). However, sites with planning permission are already available showing location plans and site information, via the Council's [application search page](#). The information can be accessed by typing in the planning application reference. Relevant information is contained in the 5th column of the table.

Online Register

- 3.14 Accompanying this report is an online register of all of sites listed in the table below. This register has been compiled in accordance with the Brownfield Land Register data standard published by central government and is a standardized open data spreadsheet with a consistent structure that will enable the information to be analysed by data analysis software. LPAs are encouraged to make their registers available in this format so that they can easily meet the requirements of any request for information issued by the Secretary of State. The Government intends to use this data to develop a more comprehensive understanding about the location and capacity of brownfield land suitable for development in the UK.

KEY

DEL = DELIVERABLE

DEV = DEVELOPABLE

* = NEW SITE

HELAA Ref. No.	Site Name / Address	Site area (ha)	No. of dwellings	Justification for inclusion in the Brownfield Land Register (Part 1)
20AB13	* Arundel Police Station, The Causeway, Arundel	1.0	12	'Made' Arundel Neighbourhood Plan – reserved for a residential redevelopment scheme in next Plan review, or sooner if the Plan is deemed out of date. The site is not currently available. DEV
BN2122PL	* The Hollies, 84 Barnham Road, Barnham	0.34	5	BN/21/22/PL for demolition of existing care home and construction of 5 dwellings – approved. DEL
22BN1	* Land at The Square, Barnham	0.34	37	'Made' Barnham & Eastergate Neighbourhood Plan – allocated for housing. Pre-application advice – refused 2020. DEL
RU4	* Sussex Business Village, Lake Lane, Barnham	0.48	11	'Made' Walberton Neighbourhood Plan – allocated for mixed use redevelopment, including up to 11 dwellings. DEV

NEWBE10	Bartons County Infants School, Romney Broadwalk, Bersted	0.59	20	Former school site within built-up area boundary, owned by WSCC and available; school relocated to a new site. Arun Local Plan Viability Study 2016 – assessed as viable and achievable. BE/40/22/PL for the demolition of a former school building and the erection of 20 new dwellings – approved. DEL
BR19811	Land at Heath Place, Bersted	0.08	14	BR/90/18/PL for 14 flats – lapsed. BR/267/21/PL for 24 flats – refused. BR/238/23/OUT for 23 flats – refused. BE/134/23/OUT for 10 dwellings – withdrawn. DEV
BE113	Land adjacent to Tesco Express, 351 Chichester Road, Bersted	0.19	6	Allocated in the Bersted Neighbourhood Plan for a minimum of 5 houses. BE/57/22/PL for 6 dwellings – approved. DEL
BR10	Covers, Richmond Road, Bognor Regis	1.19	32 - 34	Within built-up area boundary in a suitable and sustainable location. Bognor Regis Neighbourhood Plan – identified for low carbon residential led mix of uses. Arun Local Plan – included in Bognor Regis Economic Growth Area in for town centre uses. Arun Local Plan Viability Study 2016 – assessed as viable and achievable. The site is not available until the current business relocates. DEV

18BR2	Richmond Arms, 224 London Road, Bognor Regis	0.04	10	BR/142/18/OUT for demolition and conversion of existing public house into up to 10 residential units – approved. BR/8/21/RES for 10 flats – refused. BR/158/21/PL – withdrawn. BR/8/21/RES for 10 flats – allowed on appeal. DEL
BR28019	5 Victoria Drive, Bognor Regis	0.02	5	BR/280/19/PL for the redevelopment of existing retail site to a mixed-use development comprising ground floor retail unit with 5 residential units at first, second and third floor levels – lapsed. DEL
BR19	* Regis Centre Site, The Esplanade, Bognor Regis	1.57	90 - 100	BR/156/16/PL for mixed use redevelopment of the site – allowed on appeal. Lapsed. Pre-application advice – approved 2023. BR/83/23/PL for demolition of fire station on southeast corner of site and construction of a 116-bed hotel – approved. DEV
24BR1	* The Arcade, Bognor Regis	0.15	36	Within built-up area boundary in a suitable and sustainable location. Promoted for 35 homes as part of economic regeneration Brownfield Land Release Fund 2023. Call for Sites 2024 update – 36 units in 2026-2027. Site available subject to resolution of flexible retail tenancies. Site is a locally listed building. DEL
BR23822	* 2-10 The Hatters Inn, Queensway, Bognor Regis	0.08	43	BR/238/22/PL for three storey upward extension and redevelopment of existing first and second floors to deliver 43 flats – approved. DEL

21AL3	* SRC Recycling, Fontwell Avenue, Eastergate	3.27	80	Immediately abuts built-up area boundary as proposed in 'made' Barnham and Eastergate Neighbourhood Plan. Pre-application advice – refused 2021. AL/57/23/PL for demolition of all existing buildings and structures and redevelopment of the existing car salvage and recycling facility for 80 dwellings – pending. DEL
LU33	Ambulance Station, East Street, Littlehampton	0.54	9	'Made' Littlehampton Neighbourhood Plan – allocated for housing. LU/45/24/PL for redevelopment for 9 flats – approved. DEL
LU33A	Meadowfield House, East Street, Littlehampton	0.35	23	Within built-up area boundary in a suitable and sustainable location. Arun Local Plan Viability Study 2016 – assessed as viable and achievable. Call for Sites 2024 – promoted. 'Made' Littlehampton Neighbourhood Plan – partly allocated for housing. DEL
NEWLU40	Former Hospital Site, Fitzalan Road /Church Street, Littlehampton	0.54	14 - 16	Within built-up area boundary in a suitable and sustainable location. 'Made' Littlehampton Neighbourhood Plan – assessed as suitable. Littlehampton Economic Growth Area Development Delivery Study 2016 – assessed for housing. Arun Local Plan Viability Study 2016 – assessed as viable and achievable. Pre-application advice – refused 2023. DEL

PS12	Former Waitrose, Avon Road, Littlehampton	0.6	110 - 120	Arun Local Plan – included in the Littlehampton Economic Growth Area for town centre uses and considered potentially available. Arun Local Plan Viability Study 2016 – assessed as viable and achievable. LU/214/20/PL for 50 residential units and flexible commercial floorspace – lapsed. DEL
17LU9	Littlehampton - West Bank, Littlehampton	8.46	390 - 620	Littlehampton Economic Growth Area Development Delivery Study 2016 – identified as suitable. Previously developed land forms part of Strategic Allocation SD4 in Adopted Arun Local Plan. Littlehampton Economic Growth Area Development Delivery Study 2016 – identified as viable and achievable. DEV
LU18A	Land at Toddington Lane, Littlehampton	0.35	10	LU/162/17/PL for demolition of existing building and erection of 10 residential dwellings – allowed on appeal. Lapsed. LU/55/23/PL for 10 dwellings – withdrawn. DEL
LU25121	57 River Road, Littlehampton	0.04	6	LU/251/21/PL for change of use & redevelopment for 6 apartments and ancillary uses – approved. DEL
18LU2	* 46a & 47 Pier Road and land north of Clifton Road, Littlehampton	0.6	8	LU/287/17/PL for 8 dwellings – approved. LU/3/22/CLE Lawful Development Certificate confirming LU/287/17/PL has been implemented and is extant – approved. DEL

18R1	7 Sterling Parade, The Street, Rustington	0.24	6	R/87/17/PL for 4 dwellings – approved. R/148/21/CLP to increase to 6 units – refused. R/34/22/PL for 6 units – approved. R/278/22/PL for 6 new flats – approved. DEL
HP3	S & G Motors, Arundel Road, Walberton	0.75	26 - 28	'Made' Walberton Neighbourhood Plan – allocated for mixed residential development for 28 dwellings minimum. DEV

4.0 Next Steps

Consultation

- 4.1 There is no legal requirement for LPAs to undertake consultation on sites proposed for inclusion in Part 1 of Brownfield Land Register.
- 4.2 The Council has reviewed the Brownfield Land Register to determine whether there may be suitable sites that can be considered for inclusion in Part 2 of the Register (thereby automatically benefitting from Permission in Principle (PiP)). PiP is subject to location, land use and the amount of development. The upper limits of the proposed development are up to 9 homes, with less than 1,000 sqm of commercial floorspace and a site of less than 1 ha (The Town and Country Planning (Permission in Principle) (Amendment) Order 2017). This would, therefore, exclude sites on the Brownfield Land Register where sites are: 'major development' (sites of 10 or more dwellings or 1 ha or 1,000 sqm commercial development); subject to schedule 1 Environmental Impact Assessment or affect European Habitats and which already have planning permission. This step must include carrying out consultation and publicity requirements, as well as other procedures in line with the Regulations.
- 4.3 The Council has not currently identified sites which are suitable for PiP, therefore Part 2 of the Register for 2024 does not contain any sites.

Review

- 4.4 LPAs are required to review their registers at least once a year. Where land has been entered into the register but is found to no longer meets the criteria, the site will be removed from Part 1, and if applicable, Part 2.
- 4.5 The Brownfield Land Register will be kept under review and published to a similar timetable as the review and update of the HELAA, as far as this is practicable for efficiency. As part of future reviews of the Brownfield Land Register, the Council will review existing sites, any new land which has been proposed for inclusion on the register and will also consider whether it may be appropriate to include a site on Part 2 of the register.

Five Year Housing Land Supply

- 4.6 Where a site on a register is considered to be deliverable within 5 years, it can be counted towards the 5-year housing land supply (Note: sites on the Part 1 register include 'DEL' where they are to be included in the 5-year supply). LPAs are required to indicate whether sites are 'deliverable' when entering data on their registers. The information to be included in Brownfield Land Registers is intended to complement the requirements set out in the NPPF for the 5-year housing land supply. Having an up-to-date register will assist LPAs in updating

their HELAA and 5-year housing land supply in the Authority Monitoring Report (AMR).

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Planning Policy Committee Karl Roberts, Neil Crowther	Report Author	Date of Meeting	Full Council Meeting Date
Consultation on Draft Conservation Area Character Appraisals for Bognor Regis: Hotham Park & Bognor Regis: Railway Station Arun Gypsy & Traveller & Traveller Showperson Regulation 19 Publication DPD Council Vision Performance Report 2023-24	N Crowther K Owen J Follis	6 June 2024	17 July 24
Response to consultation on revised National Planning Policy Framework	Z Ellwood	18 Sept 2024	7 November 24
Arun Community Infrastructure Levy - Infrastructure Investment Plan (2024-2026) Arun Community Infrastructure Levy - Infrastructure Funding Statement 2024 Arun Secondary School Update Local Plan Update Direction of Travel Consultation Response 2023-2041 Three Harbours Strategy 2024 to 2028 Budget 2025/26 process Budget Monitoring report to 30 June 2024	N Crowther N Crowther N Crowther N Crowther Z Ellwood A Baden A Baden	26 Sept 2024	7 November 24

Planning Policy Committee Karl Roberts, Neil Crowther	Report Author	Date of Meeting	Full Council Meeting Date
Southern Water Draft Water Resource Management Plan (WRMP) Consultation (11 September to 4 December 2024) Brownfield Land Register Update	Z Ellwood / V Hobday Z Ellwood / V Hobday	28 Nov 2024	8 January 25
Consultation on Draft Conservation Area Character Appraisal for Public Comment Arun Authority Monitoring Report (AMR) Budget Monitoring report to 31 December 2024 Housing Economic Land Availability Assessment (HELAA) Arun Local Plan Update (2023 – 2041) – Appointment of Lead Consultant following an Open Tender process Deliverable of affordable housing through the s.106 process Arun Biodiversity Action Plan Barnham/Eastergate/ Westergate Infrastructure Development Plan (BEWIDP)	N Crowther N Crowther A Baden N Crowther / R Sherman N Crowther / Z Ellwood N Crowther N Crowther / J Best D Easton	28 Jan 2025	19 March 25