



# Public Document Pack

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Committee Manager Carrie O'Connor

4 June 2019

## Planning Policy Sub-Committee

A meeting of the Planning Policy Sub-Committee will be held in Committee Room 1 (Pink Room) Arun Civic Centre on the Tuesday 18th June 2019 **at 6.00 pm** and you are requested to attend.

Members: Councillors Yeates (Chairman), Jones (Vice-Chair), Bower, Charles, Dixon, Elkins, Hughes, Huntley, Lury, Oppler, Mrs Pendleton, Thurston, Dr Walsh and Worne

## AGENDA

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

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

Members and officers should make their declaration by stating :

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

3. MINUTES

(Pages 1 - 8)

To agree as a correct record the Minutes of the meeting held on 27 February 2019.

4. ITEMS NOT ON THE AGENDA WHICH THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES
  
5. ADOPTION OF A POLICY IN RELATION TO SURFACE WATER IN NEW DEVELOPMENT (Pages 9 - 12)  

The Sub-Committee will be asked to consider adopting a Policy in relation to the disposal of surface water in all new development. It follows the approach adopted by West Sussex County Council (as Local Lead Flood Authority) in its published Policy.
  
6. CIL DRAFT CHARGING SCHEDULE CONSULTATION RESPONSES (Pages 13 - 90)  

Members of the Sub-Committee will be advised of the results of the Arun CIL Draft Charging Schedule consultation summarising representations. This will include whether any modifications are required and to seek consent to submit the Draft Charging Schedule for examination.
  
7. OPEN SPACE SUPPLEMENTARY PLANNING GUIDANCE (Pages 91 - 160)  

The Sub-Committee will be advised on draft Open Spaces, Playing Pitches and Built Facilities Supplementary Planning Guidance document and timetable to public consulting on the SPD, needed to support the implementation of the Open Spaces policies within the Arun Local Plan 2011-2031 (2018).
  
8. AUTHORITY MONITORING REPORT (Pages 161 - 230)  

The Sub-Committee will be advised on the Arun Local Planning Authority's Monitoring Report 2017/18. This will include commentary on housing land supply. The full report will be provided as Background Paper 1 (published on the Council's web site following the meeting).
  
9. PARKING STANDARDS SUPPLEMENTARY PLANNING DOCUMENT (Pages 231 - 250)  

Members are provided with a report that contains the proposed policy approach to Parking Standards based on technical evidence which has been adapted for Arun's circumstances and will be subject to public consultation and adoption as Council Policy.

Note : \*Indicates report is attached for all Members of the Council only and the press (excluding exempt items). Copies of reports can be obtained on request from the Committee Manager).

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

# Agenda Item 3

Subject to approval at the next Planning Policy Sub-Committee meeting

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## PLANNING POLICY SUB-COMMITTEE

27 February 2019 at 6.00 pm

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

### 10. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillors Mrs Bence, Oppler, Mrs Pendleton and Stanley.

### 11. DECLARATIONS OF INTEREST

No declarations of interest were made.

### 12. MINUTES

The Minutes of the meeting held on 5 December 2018 were approved by the Subcommittee and signed by the Chairman as a correct record.

### 13. GYPSY & TRAVELLERS - ISSUES & OPTIONS

The Planning Policy Team Leader presented this report which detailed the work that had been undertaken to date to progress the development of a Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document (DPD) for the District, with a view to initiating an Issues and Options consultation under Regulation 18 of the national Planning Policy for Travellers.

The Subcommittee was advised that information had been omitted from the table within the report detailing the requirement for plots for travelling showpeople and those figures were added at the final line of the amended table below.

Table 1: Additional need for Gypsy and Traveller households in Arun that met the Planning Definition by year periods

Years	0-5	6-10	11-15	16	17	18	Total
	2018-23	2023-28	2028-33	2033-34	2034-35	2035-36	
Pitches	5	1	2	0	0	1	<b>9</b>
Plots	11	2	1				<b>14</b>

In the course of discussion, a request was made that Members and the relevant Parishes be circulated with plans of the locations of the 8 sites being assessed for consultation.

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Clarification was sought that, with respect to the site known as Dragonfly in Eastergate Lane, any future provision would comply with the original condition that required that only named persons could occupy the site. The Planning Policy Team Leader confirmed that should pitches be increased at the site, a similar condition would be attached to any further permissions. Similarly, clarification was also sought about the Caravans Site North of A259 off Norway Lane, which had recently obtained planning permission, and the single HELAA site. The Planning Policy Team Leader confirmed that the assessment study was looking at the intensification, expansion and reconfiguration potential of existing sites. The HELAA site (Bilsham Corner) was the only land owner response received that indicated potential interest but was a non-developable HELAA site which was still subject to site screening.

The Subcommittee

RESOLVED – That

(1) the proposed approach and evidence progress be noted for the preparation of the Arun District Council Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document covering the period 2018-2036 be noted; and

(2) an Issues and Options consultation be undertaken in May 2019 on 8 potential site options being assessed, and that the Group Head of Planning, in consultation with the Chairman and the Planning Portfolio Holder, be granted delegated authority to finalise the options for consultation from within this list, including from any potential HELAA sites should they be suitable and become available.

14. SECONDARY SCHOOL TO SUPPORT THE LOCAL PLAN STRATEGIC ALLOCATIONS

*(In the course of discussion on this item, Councillor Elkins declared a personal interest as a Member of West Sussex County Council.)*

Due to the significant growth of development in the District, it had been identified that there was a requirement to provide a new 10 Form Entry Secondary School in the District. The Planning Policy Team Leader presented this report which explained the rationale for putting forward Site F as the preferred location for a new secondary school. It was also suggested that, should Site F become undeliverable and should Site L become available, that option could also be further explored.

In the course of discussion on the matter, concerns were raised that to progress Site L could require the implementation of a Compulsory Purchase Order and that was a course of action that the Council would be disinclined to proceed with. It was

therefore agreed that the recommendation within the report should be amended to delete the second sentence as follows:-

~~“Supports the identification of Option/Site F as the preferred option for location of a 10 Form Entry Secondary School to support the Local Plan Strategic allocations. If this Option becomes undeliverable then it is recommended that the Council explore appropriate mechanisms to secure delivery of a 10 Form Entry Secondary School at either Site F or Site L and provide an appropriate report for consideration to this committee.”~~

Following further comment relating to the Ford Neighbourhood Plan, the Subcommittee

#### RECOMMEND TO FULL COUNCIL

That the identification of Option/Site F be supported as the preferred option for location of a 10 Form Entry Secondary School to support the Local Plan Strategic allocations.

#### 15. CHICHESTER LOCAL PLAN REGULATION 18 (PREFERRED APPROACH) PUBLIC CONSULTATION

The Planning Policy Team Leader presented this detailed report on a response that had been sent to Chichester District Council with regard to their consultation under Regulation 18 draft plan (Preferred Approach) stage and followed an Issues and Options consultation in June 2017.

The report recognised that Chichester’s emerging plan provided a clear and justified strategy to delivering growth requirements in meeting its capped OAN (Objectively Assessed Need) but also in addressing unmet needs for the SDNP (South Downs National Park). However, Arun considered that its support for Chichester’s Preferred Approach draft Local Plan going forward was subject to progressing the actions detailed in the report before publication stage.

In discussing the matter, Members were extremely concerned that transport issues crossing over from the west of the Arun District into Chichester must be addressed, specifically Pagham Road and the A259. Infrastructure must be put in place to accommodate the new housing in Chichester to prevent any adverse impacts on the surrounding road networks.

The Planning Policy Team Leader was able to advise that meetings had been taking place at officer level and Chichester District Council was engaging with Highways England and the County Council and had offered to invite Arun to be part of that process.

The Subcommittee then

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RESOLVED - That

(1) the conclusions set out in paragraphs 1.27 to 1.29 (inclusive) to the report be as Arun District Council's formal response to the Chichester draft Local Plan Regulation 18 Consultation; and

(2) that Arun conditionally supports Chichester's draft plan at this stage but would strongly encourage Chichester to consider doing more with regard to its capped housing target (as it has done for SDNP) to address unmet housing needs and to further clarify the plan's supporting evidence prior to submission, in order to minimise any potential risks posed to 'soundness under the 'Duty to Cooperate' in accommodating unmet housing need within the West Sussex and Greater Brighton Area.

16. BROWNFIELD LAND REGISTER 2018

In presenting this report, the Planning Policy Team Leader advised that 4 sites needed to be removed from the register as they failed to meet the necessary criteria by being below 2.5 hectares. However, following comment from the Group Head of Planning, it was subsequently agreed that the list would remain as set out in the report and appendix, and should any changes be required these could be delegated to the Group Head of Planning in consultation with the Chairman and the Portfolio Holder for Planning

Following a short discussion, the Subcommittee

RESOLVED – That

(1) the 2018 Brownfield Land Register (Part 1) be agreed, subject to any required changes being delegated to the Group Head of Planning, in consultation with the Chairman and the Portfolio Holder for Planning; and

(2) officers work towards the production of the Brownfield Land Register (Part 2) including the carrying out of consultation and publicity requirements, as well as other procedures in line with the Brownfield Land Register Regulations 2017.

17. HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT (UPDATE TO THE 2018 PUBLICATION)

The Subcommittee received an update report on the Housing and Economic Land Availability Assessment (HELAA) and was advised by the Planning Policy Team Leader that the HELAA employment sites were an update to be included with the housing HELAA sites document considered at the meeting held on 5 December 2018. However, County data relating to planning permissions had identified a further 12 sites

that could be included in the HELAA and a schedule had been produced and would be uploaded to the HELAA document page on the Council's website.

The Subcommittee then

**RESOLVED**

That the updated Housing and Employment Land Availability Assessment, together with the updated sections dealing with employment sites and strategic sites, as part of the evidence base for the Local Plan and any further Development Plan Document preparation, be agreed.

**18. AUTHORITY MONITORING REPORT 2017/18**

The Group Head of Planning advised that this item had been withdrawn from the agenda and would not be considered as the relevant information had only recently been published by the Government following a considerable delay, having originally been scheduled for November 2018 in relation to the Housing Delivery Test. As a result it would not be possible to publish the AMR until the meeting in June 2019.

**19. LYMINSTER & CROSSBUSH APPLICATION FOR DESIGNATION OF A NEIGHBOURHOOD AREA**

Lyminster & Crossbush Parish Council had applied to the Council and the South Downs National Park Authority for designation of Neighbourhood Area under Part 2 of the Neighbourhood Planning (General) Regulations 2012 – Regulation 5. The Council subsequently publicised the area application as required under Part 2, Regulation 6, and the next stage was for the Council to agree and designate the neighbourhood area.

The Planning Policy Team Leader presented this report which sought agreement to that designation and the Subcommittee

**RECOMMEND TO FULL COUNCIL**

That the specified area, without modification, is appropriate to be designated as the Lyminster & Crossbush Neighbourhood Area for the reasons set out in the application and in light of the results of the public consultation, which did not receive any representations.

**20. CIL UPDATE REPORT**

The Planning Policy Team Leader presented this report which provided a summary of the responses received from the Preliminary Draft Charging Schedule (PDCS) consultation which ran from 10 December 2018 to 21 January 2019. Members were advised that the responses received as part of the PDCS had informed the preparation of a proposed Draft Charging Schedule and agreement was being sought

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for that to go out to public consultation from Thursday 21 March until 5 p.m. on Thursday 2 May 2019.

A question was asked in relation to the timescale beyond July for progressing the CIL Charging Schedule and Members were advised that it was set out in the Local Development Scheme on the Council's web site but, in brief, it was anticipated that the examination would take place in the Autumn, i.e. September/October with adoption in Spring 2020.

The Subcommittee

RESOLVED - That

(1) the summary of responses received as part of the Preliminary Draft Charging Schedule consultation be agreed;

(2) the Draft Charging Schedule (March 2019) is published for public consultation (under Regulation 16 of the CIL Regulations 2010 as amended) from Thursday 21 March 2019 until 5 pm Thursday 2 May 2019; and

(3) the officer response to the Government's Technical Consultation on Reforming Developer Contributions (December 2018), be noted.

21. PROVISION OF ACCOMMODATION SUITABLE FOR OLDER PEOPLE AND PEOPLE WITH DISABILITIES

The Group Head of Planning introduced this report which was seeking agreement to draft guidance on the provision of accommodation suitable for older people and people with disabilities.

The Subcommittee was advised that provision of accommodation for older persons and people with disabilities was included within the Arun Local Plan, as well as the NPPF, and there was strong evidence that housing needs for people over 65 would significantly increase over the Plan period, as set out at page 126 of the agenda. Furthermore, there was also evidence of a significant need for accommodation for people with disabilities and these were concentrated in the more elderly population as shown on page 128.

The Council recognised that there was a cost to the development industry in making provision for different types of housing. However, the Council was obliged, together with developers, to contribute to meeting the housing needs for all the residents of Arun. It was therefore considered to be reasonable to adopt some standards that would be applied to new developments whereby specific accommodation would be provided for both the elderly and those with disabilities.



It was the intention to carry out a consultation on these standards, which would then be reported back to the Subcommittee.

The Subcommittee welcomed the initiative and

**RESOLVED – That**

(1) the proposed standards for the provision of accommodation suitable for older persons and people with disabilities are approved for the purposes of consultation;

(2) appropriate consultation on the proposed standards be undertaken and any consultation responses be reported back to the Subcommittee;

(3) the proposed standards for the provision of accommodation suitable for older persons and people with disabilities are treated as a material consideration in respect of the determination of all relevant planning applications; and

(4) the Equality Impact Assessment at Section 6 of the report be noted.

**22. PROVISION OF CHANGING PLACE TOILETS**

The Group Head of Planning, by way of this report, requested the Subcommittee to approve adoption of guidance on the provision of Changing Place Toilets in appropriate destinations and developments to assist with the needs of people with complex and multiple disabilities and impairments.

Members were advised that the Council had been working on some guidance to support and promote the provision of 'Changing Place Toilets', as attached at Appendix B to the report. It was anticipated that the guidance might be incorporated into the Planning Design Guide in due course.

The Subcommittee

**RESOLVED**

That the leaflet attached as Appendix B to the report be used as guidance on the provision of Changing Place Toilets in appropriate destinations and developments to assist with the needs of people with complex and multiple disabilities and impairments.

(The meeting concluded at 7.25 pm)

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 18 JUNE 2019

#### PART A : REPORT

**SUBJECT:** Adoption of a Policy in Relation to Surface Water in New Development

**REPORT AUTHOR:** Roger Spencer – Engineering Services Manager  
**DATE:** May 2019  
**EXTN:** 37812  
**PORTFOLIO AREA:** Technical Services

#### EXECUTIVE SUMMARY:

The Report seeks the adoption of a Policy in relation to the disposal of surface water in all new development. It follows the approach adopted by West Sussex County Council (as Local Lead Flood Authority) in its published Policy.

#### RECOMMENDATIONS:

The Sub-Committee is asked to recommend to Full Council that:  
the West Sussex Council Policy “West Sussex LLFA Policy for the Management of Surface Water” (November 2018 and as updated from time to time) is adopted particularly but not exclusively in relation to all new development within Arun District.

#### 1. BACKGROUND:

- 1.1. Following the Flood and Water Management Act of 2010 there has been a shift in the way that surface water is dealt with in new development.
- 1.2. This shift aims to deal with the disposal of surface water in a sustainable manner and is commonly known as SuDS – Sustainable Drainage Systems.
- 1.3. Guidance is available on the Arun District website and various standards, guidance, codes of practice and other documents have been issued by Government and other bodies but this has not been coalesced into a single Policy document for Arun District.
- 1.4. Whilst there should be some consistency available from these various guides, there is little compulsion upon developers to adopt best practice other than discharging conditions applied to Planning Approvals. Conditioning is seen as potentially too late in the process; drainage should be considered at the inception of a development proposal, rather than an afterthought.
- 1.5. West Sussex County Council (WSSCC) is, under the terms of the Flood and Water Management Act 2010, the Local Lead Flood Authority (LLFA) for this area. This Council acts as agent to WSSCC for consenting and enforcement of land drainage issues and seeks to apply a consistent set of standards for dealing with existing

systems and new development.

1.6. The Policy document produced by West Sussex County Council (see link in Background papers) serves this process and is considered fit for purpose as a formal policy document without Arun having to 'reinvent the wheel'.

1.7. It covers a number of areas including:

- the use of SuDS in Planning
- the National Planning Policy Framework,
- watercourse regulation,
- Strategic Flood Risk Assessment
- WSCC guidance (see Background Papers)
- Other guidance
- Sustainable Drainage and environmental policies

1.8. It also includes guidance for smaller developments.

**2. PROPOSAL(S):**

To adopt the West Sussex Council Policy "West Sussex LLFA Policy for the Management of Surface Water" particularly but not exclusively in relation to all new development within Arun District.

**3. OPTIONS:**

To adopt the WSCC Policy as proposed, or

Not to adopt the Policy, which would have the effect of weakening the Council's position on ensuring new development is undertaken in a sustainable and best practice manner.

**4. CONSULTATION:**

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

5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		✓
Legal		✓
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability	✓	

Asset Management/Property/Land		✓
Technology		✓
Other (please explain)		✓
<b>6. IMPLICATIONS:</b>		

**7. REASON FOR THE DECISION:**  
 To raise awareness of the robust and consistent approach that Arun District Council takes in dealing with surface water in new development.

**8. BACKGROUND PAPERS:**  
 WSCC Policy Document :  
[https://www.westsussex.gov.uk/media/12230/ws\\_llfa\\_policy\\_for\\_management\\_of\\_surface\\_water.pdf](https://www.westsussex.gov.uk/media/12230/ws_llfa_policy_for_management_of_surface_water.pdf)  
 Guide prepared for Local Lead Flood Authorities of the South East of England  
[https://www.westsussex.gov.uk/media/2270/suds\\_design\\_guidance.pdf](https://www.westsussex.gov.uk/media/2270/suds_design_guidance.pdf)

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## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE on 18 June 2019

#### PART A : REPORT

**SUBJECT: Community Infrastructure Levy Draft Charging Schedule Consultation Update and Proposal to Submit**

**REPORT AUTHOR:** Nicki Faulkner, Principal Planner

**DATE: EXTN:** x 37645

**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

This report advises members of the Planning Policy Sub Committee of the results of the Arun CIL Draft Charging Schedule consultation by providing a summary of the representations received. This includes a schedule of modifications that are required with reasons. The report seeks consent to submit the Draft Charging Schedule to the independent Examiner in accordance with Regulation 19 of the CIL Regulations 2010 (as amended).

#### RECOMMENDATIONS:

1. That the Planning Policy Sub-Committee recommends to Full Council that the Draft Charging Schedule (Submission Version) (the DCS Submission Version) (provided as Background Paper 3 to this report) along with all required supporting documentation, as required, are submitted to the appointed independent Examiner in accordance with Regulation 19 of the CIL Regulations (as amended) on the 31 July, or as close as that date as possible.

#### 1. BACKGROUND:

- 1.1 The Planning Policy Sub-Committee of 27 February 2019 agreed that the Arun Community Infrastructure Levy (CIL) Draft Charging Schedule March 2019 (the DCS), should be published for public consultation from 21 March 2019 until Thursday 2 May 2019 in accordance with Regulation 16 of the CIL Regulations 2010 (as amended). The intention of publishing the DCS is to consult on the document which the Charging Authority intends to submit for examination.
- 1.2 The report also sets out the next steps in the process to achieving an adopted CIL Charging Schedule which is via the submission of the DCS to the CIL Examiner for Examination in Public, subject to agreement by Full Council.
- 1.3 In response to the DCS consultation, a total of twenty two representations were received from nineteen representors. Of those representations, five were objecting, one was supporting and sixteen were commenting on the DCS. A Statement of

Representations (which, subject to agreement by Full Council, will be sent as part of the submission documents to the Examiner), summarising the responses from the DCS consultation is provided in Background Paper 1.

1.4 The main points raised as part of the consultation are as follows (for the Council's responses to these points, please refer to Appendix 2 of Background Paper 1):

- DCS20194 Concern that the strategic housing allocations remain zero rated;
- DCS20196 Objection by Littlehampton Town Council that the development of town centre shops would not generate an income from CIL;
- DCS20197 Objection to zero rating developments larger than 11 units in Zone 4 as shown in Appendix 1 of the Draft Charging Schedule;
- DCS201913 Request to include a better definition of 'residential' in the DCS Table 7.1 to ensure there is clarity over how 'static caravans for holiday purposes' are treated;
- DCS201914 Comment that the CIL Viability Update Report 2018 does not test viability of development on existing residential land. Concern that small housebuilders haven't been considered and request to better define Student Accommodation and Build to Rent in the Charging Schedule;
- DCS201920 Request for clarity as to whether garden centres would fall under the "Retail Warehouse" category or under "all other development";
- DCS201921 Objection to "extra care housing" being included under the category of "Older People's Housing; and
- DCS201922 Concern over a lack in clarity over how CIL and S106 will be spent.

1.5 It is considered that the main points raised through the consultation do not materially affect the DCS charges and so no changes are proposed for the charges set out in Table 7.1 of the DCS. However, it is accepted that a number of minor points of clarification are required on the DCS. These are set out in Background Paper 2 which presents the Statement of Modifications (SoM).

1.6 The modifications shown within the SoM are presented within the DCS Submission Version (in Background Paper 3). All matters raised will be considered by the CIL Examiner as part of the Examination in Public process as covered below.

## **2. Next Steps**

2.1 The next steps towards adopting a CIL Charging Schedule is submission of the DCS Submission Version for examination. The Examiner must consider whether it has been prepared in compliance with the Planning Act 2008 and the CIL Regulations 2010 (as amended) in establishing the rates set for chargeable development. This means that it has been prepared based on robust viability and infrastructure evidence and that the CIL rates proposed would not put the delivery of the 'relevant plan' at risk (the 'relevant plan' being the Arun Local Plan 2018).

2.2 Upon submission of the DCS Submission Version, any person who made representations on the DCS and indicated their preference to be informed of submission, will be notified. Furthermore, all consultation bodies consulted at the Preliminary Draft Charging Schedule (PDCS) (between 10 December 2018 and 21



January 2019) will be sent a copy of the SoM, and the SoM will be published on the Council's website.

2.3 If anyone wishes to be heard in relation to the SoM, they must inform the Charging Authority in writing within four weeks of the date the SoM was submitted to the Examiner. The charging authority must submit a copy of each request it receives to the Examiner as soon as practicable after the expiry of that four week period.

2.4 The Examiner will hold hearings on the DCS Submission Version as part of the examination approximately 6 to 10 weeks after submission. Following examination, the Examiner will make their recommendations in accordance with section 212A of the Planning Act 2008 and give reasons for those recommendations.

2.5 The options available to the Examiner in making their recommendations are:

- a) to reject the draft due to non-compliance with the drafting requirements where non-compliance can't be remedied with modifications; or
- b) To recommend any modifications, if required, which would be necessary to remedy any non-compliance; or
- c) Subject to a) and b), the Examiner must recommend the draft be approved.

2.6 In accordance with Regulation 23 of the CIL Regulations 2010 (as amended), the Examiner's recommendations and reasons for those recommendations must be submitted to the charging authority. As soon as practicable after the day on which it receives the recommendations and reasons, the charging authority must make the Examiner's report available for inspection, publish it on the website and give notice to those who requested to be notified of the Examiner's recommendations.

2.7 Following the receipt and publication of the Examiner's recommendations, a further report will be brought to Planning Policy Sub-Committee setting out any modifications recommended by the Examiner and recommending the approval of the CIL charging schedule as modified. At this stage, the council cannot make any further modifications to the charging schedule – only those as recommended by the Examiner. The final Charging Schedule will set out the date on which it will take effect i.e. the day that Arun District Council will commence charging CIL.

### **3.0 Conclusion**

3.1 A significant amount of work and resource has been invested into progressing and preparing a CIL Draft Charging Schedule in accordance with the Planning Act 2008 and the CIL Regulations 2010 (as amended). Subject to achieving an approved charging schedule, CIL will provide an important income stream to support planned development to 2031 and beyond.

### **2. PROPOSAL(S):**

That the Draft Charging Schedule is submitted for examination

### **3. OPTIONS:**

Not to submit the CIL Draft Charging Schedule Submission Version will mean a significant delay to the preparation of the CIL charging schedule or even the decision not to proceed with CIL. Delaying or stopping the progression of the CIL draft charging schedule will

mean that the estimated £30 million of CIL receipts may not be achieved to be spent on infrastructure projects and there will be a continued reliance on S106 contributions which are subject to pooling restrictions in accordance with Regulation 123 of the CIL Regulations 2010 (as amended).

Furthermore, Town and Parish Councils with 'made' neighbourhood plans will no longer be able to plan ahead with the understanding that they will receive 25% of CIL receipts from the development on non-strategic sites; windfall sites or deliverable HELAA sites in their areas.

**4. CONSULTATION:**

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

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

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

**6. IMPLICATIONS:**

Subject to the CIL Charging Schedule being approved, an implementation date will need to be set. Implementation of CIL will have impacts on financial processes.

There is a requirement for Legal to be involved in supporting the preparation of the CIL Charging Schedule and as part of the implementation/collection of CIL receipts.

Where the council proposes development on its own land/property, the department should be aware of the CIL liability. It should be noted that relief can be granted from CIL as part of the development of social housing.

**7. REASON FOR THE DECISION:**

**8. EFFECTIVE DATE OF THE DECISION: 17 July 2019**

**9. BACKGROUND PAPERS:**

Background Paper 1: Statement of Representations and Compliance with Consultation Requirements (in accordance with Regulation 15, 16, 17 and 19 of the Community Infrastructure Levy Regulations 2010 (as amended))

Background Paper 2: Statement of Modifications and Draft Charging Schedule Submission Version

Background Paper 3: Draft Charging Schedule (Submission Version)

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## **COMMUNITY INFRASTRUCTURE LEVY (CIL)**

### **STATEMENT OF REPRESENTATIONS AND COMPLIANCE WITH CONSULTATION REQUIREMENTS**

**Regulation 15, 16, 17 and 19 of the Community  
Infrastructure Levy Regulations 2010 (as  
amended)**

**MAY 2019**

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

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## **1.0 Introduction**

- 1.1 This Statement of Consultation (SoC) sets out how Arun District Council has carried out the necessary consultation to inform the preparation of the Community Infrastructure Levy (CIL) Draft Charging Schedule (DCS). The statement addresses the requirements of Regulations 15, 16, 17 and 19 of the CIL Regulations 2010 (as amended).
- 1.2 The Council is satisfied that the requirements of these Regulations have been met with regard to consultation on the Preliminary Draft Charging Schedule and Draft Charging Schedule.

## **2.0 The Preliminary Draft Charging Schedule**

- 2.1 Consultation on the Arun Preliminary Draft Charging Schedule (PDCS) ran from 10<sup>th</sup> December 2018 to 5pm on 21<sup>st</sup> January 2019. The CIL Regulations require that at this stage, the charging authority must send a copy of the PDCS to each of the consultation bodies<sup>1</sup> and invite them to make representations. The council must also invite representations from other persons resident or carrying out business in its area, as well as other bodies as considered appropriate<sup>2</sup>.
- 2.2 As part of the consultation process, the council:
- Sent letters/emails to consultees on the Planning Policy database informing them of the PDCS Consultation and inviting them to make representations on the PDCS;
  - Sent a copy of the PDCS to each of the consultation bodies;
  - Published a press release and published an article in the Arun Times (a free magazine produced by the Council and distributed to all householders in the district); and
  - Made hard copies of the PDCS and comment forms available at all libraries within the Local Planning Authority Area (outside of the South Downs National Park) and at the reception desks at Arun District Council and Bognor Regis Town Hall
- 2.3 During the PDCS consultation period, the Council received 34 comments from 28 respondents. A summary of the comments received was taken to Planning Policy Sub-Committee on 27<sup>th</sup> February 2019. The summary of responses received can be found in Appendix 1 and Appendix 1a which provides a

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<sup>1</sup> As defined in Regulation 15(3)

<sup>2</sup> As defined in Regulation 15(5)

focused response to Frontier Estates on the matter of Extra Care developments.

- 2.4 The comments received were taken into account in the preparation of the Draft Charging Schedule. The main changes included points of clarification and the preparation of an infrastructure list (in accordance with Reg. 123 of the CIL Regulations 2010 (as amended)).

### **3.0 The Draft Charging Schedule**

- 3.1 On 27<sup>th</sup> February 2019, the Planning Policy Sub-Committee agreed that the Draft Charging Schedule should be published for public consultation under Reg. 16 of the CIL Regulations 2010 (as amended) from Thursday 21<sup>st</sup> March 2019 until 5pm 2<sup>nd</sup> May 2019.

- 3.2 The consultation was carried out in compliance with Regulation 16 and 17 of the CIL Regulations 2010 (as amended). The following actions were undertaken:

- The Draft Charging Schedule, evidence documents, Reg. 17 Statement of Representation Procedure; Regulation 16 Notice of Publication; and comment forms were made available at the Arun Civic Centre and Bognor Regis Town Hall as well all libraries within the Local Planning Authority area outside the South Downs National Park Authority in accordance with Reg. 16 (1) (a).
- The Draft Charging Schedule; evidence documents; Reg. 17 Statement of Representation Procedure; a statement of the fact that the DCS and relevant evidence are available for inspection and where they can be inspected; The Reg 16 Notice of Publication of a Draft Charging Schedule and comment forms were published on the Arun District Council website in accordance with Reg. 16 (1) (b)
- A copy of the Draft Charging Schedule; Reg. 17 Statement of Representations Procedure; and the Reg 16 Notice of Publication the Draft Charging Schedule was sent to each of the consultation bodies
- A letter/email was sent to all consultees on the Planning Policy database inviting representations on the DCS
- The Regulation 16 Notice of Publication and Regulation 17 Representations Procedure was published in the West Sussex Gazette on 21<sup>st</sup> March 2019 in accordance with Regulation 16 (1)(d)



## **4.0 Representation Statement and Summary of the Main Issues Raised by the Representors**

- 4.1 A total of 22 representations were duly made in accordance with Regulation 17 of the CIL Regulations 2010 (as amended). Of those representations, 5 were 'objecting', 1 'supporting' and 16 'commenting'.
- 4.2 The duly made representations were reviewed by the Council and its viability consultants HDH Planning and Development Ltd. Appendix 2 provides a summary of the representations including whether they were formally 'supporting', 'objecting' or 'commenting' and whether the representor indicated that they wished to be heard by the examiner. The Council's responses to the representations are also provided.

## **5.0 Changes to the Draft Charging Schedule as a Result of Consultation**

- 5.1 Representations received at the DCS consultation stage were considered against national legislation, the CIL Regulations 2010 (as amended) and the National Planning Practice Guidance. Following a review of the comments received and the identification of minor drafting errors, the Council has proposed some minor modifications to the CIL DCS which are set out in the Statement of Modification (SoM). None of these changes are considered to be substantive.
- 5.2 In accordance with Regulation 19(4)(a) and (b) a copy of the SoM will be sent to the consultation bodies invited to make representations under Regulation 15 and published on the Arun District Council website before submitting the DCS and other necessary documents to the examiner.

## APPENDIX 1 – SUMMARY OF REPRESENTATIONS FROM THE PRELIMINARY DRAFT CHARGING SCHEDULE CONSULTATION

**Note:**

Reference is made in this table to a number of evidence documents including the Infrastructure Capacity Study and Delivery Plan, 2017 (ICSDP);

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
PDCS1 Individual	Identified Pagham South inconsistency – Gross Ha in Table 6.1 c (which states 18.83) and Tables 2.1 and 5.2 (which states 24.52)	See Table 9.9 on page 106 of the Arun Local Plan Viability Assessment Update, 2017. The different figures refer to the total site area and the site area less existing development, flooding, employment etc.	No change
	Queries viability evidence, in particular zero rating of strategic sites and comments on complexity of report	The viability evidence has been prepared in accordance with the requirements of the NPPF and NPPG and CIL Regulations. No changes suggested. A Q&A paper will be prepared to address points of clarification regarding technical details.	No change
	How will ADC raise sufficient funds to meet the costs of infrastructure to deliver the strategic sites?	The required infrastructure to support the delivery of the strategic housing allocations is set out in the evidence base used to support the preparation of the Arun Local Plan, which was tested at Examination in Public. The, requisite infrastructure will be delivered through S106 on the strategic sites. These costs have been taken into account in the viability evidence base. The testing showed that based on these additional costs, it would not be viable to charge CIL on these sites, based on the high S106 costs.	No change
PDCS2 Bognor Regis TC	No response to submit at this stage	Noted	No change

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
PDCS3 Walberton PC	Support	Noted	No change
PDCS4 LTC	LTC questions the assumption that town centre development would not attract CIL, particularly taking into account the change of use from retail to residential which has become a feature of the evolution of the Town Centre in Littlehampton	CIL is only chargeable on the gross area of <b>net new development</b> , therefore CIL would not apply to conversions of town centre buildings to residential units.	No change
PDCS5 Individual	Table 5.1 of the PDCS does not provide full infrastructure cost for district wide requirements	The CIL Guidance requires that charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put the levy in place. This is evidenced by the ICSDP, 2017.	No change
PDCS6 Individual	Comparison between large greenfield sites – non strategic and strategic. Why are the strategic sites less viable?  The S106 contribution per strategic dwelling will be more than twice the combined S106 and CIL contribution per non-strategic dwelling.  Concern regarding the loss of 25% portion for those areas with a made neighbourhood plan.	High S106 costs are included in the viability calculations for the strategic sites, based on the findings of the ICSDP.  The viability evidence used to test the strategic sites is based upon testing the levels of S106, set out in the ICSDP.  Noted – incorporate this into working out forecast CIL levy receipts	No change  No change  No change
PDCS7 Individual	Provide an anticipated CIL Funding Total based on number of houses due to be built in each zone	This figure is provided in 27 <sup>th</sup> September, 2018 committee report, which states: <i>based on the Housing and Economic Land Availability Assessment only, it is estimated that CIL receipts could total approximately £30 million.</i> Update this figure based on emerging NSS.	See action above.
PDCS8 individual	Check consistency in funding gap figure between PDCS and ICSDP, 2017.  Update expected S106 funding for social and leisure in PDCS compared to section 8 of the ICSDP	Reviewed. The funding gap has been identified by taking into account expected S106. Therefore, table 5.1 in the PDCS does look different because the ICSDP does not take account of expected S106 from strategic sites in meeting part of the funding gap.  Reviewed and found that the library requirements not included in total. These have been added.	Check funding gap in ICSDP report and PDCS.  Updated

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	Concern that all district wide infrastructure will need to be funded by CIL from non-strategic sites. Implication that CIL will pay for the full funding gap – what will be the source of funds to fill the gaps?	In some cases grant funding can be achieved for certain infrastructure projects. Capital funding may also be available. In terms of identifying a funding gap, the CIL Guidance states: <i>The government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy</i> (016 Reference ID: 25-016-20140612). ADC will continue to review the infrastructure costs and update where possible.	No change
PDCS10 Ferring PC	Support	Noted	No change
PDCS11 Bersted PC	Consultation methods should be given consideration	Consultation carried out in accordance with Arun Statement of Community Involvement, 2012 and in accordance with CIL Regulations, 2010 as amended.	No change
PDCS12 Angmering CLT	Community Land Trusts should be exempt from the CIL charge and included specifically as a category for exemption.	All developers of affordable housing can apply for relief from CIL.	No change
PDCS13 Angmering CLT	Discretionary relief for affordable commercial business premises where the developer is a registered Community Land Trust.	The council will consider whether to implement discretionary relief following adoption of the Charging Schedule (para. 9.4 of PDCS, 2018)	No change
PDCS14  Aldingbourne PC with  Barnham and Eastergate PC	Concerned about the delivery of the right infrastructure to mitigate the impacts of strategic sites such as Barnham Eastergate Westergate.  Provided community infrastructure list needed to support growth in the village and infrastructure requirements in relation to Barnham Eastergate Westergate.	The Arun Local Plan's strategy is to deliver infrastructure required to support the strategic sites through S106. This is set out in the Infrastructure evidence used to support the Arun Local Plan.  Noted	No change  To be included in ICSDP as part of ongoing review
PDCS15	More information is needed on the maximum amount of	The council will consider whether to implement	No change

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
Aldwick PC	discretionary relief that can be granted as well as more information on exemptions.	discretionary relief following adoption of the Charging Schedule (para. 9.4 of PDCS, 2018).  Noted - Further details regarding exemptions can be provided in a Q&A paper.	No change
PDCS16 Aldwick PC	Clearer maps outlining where each zone begins and where these intersect with parish boundaries.	Noted	Online interactive mapping is available which allows user to zoom in to property. CIL zones are not prepared based on parish boundaries therefore this data would add further complexity.
PDCS17 Landform Estates Ltd	Supports Zone 1 nil charge	Noted	No change
PDCS18 Hallmark Care Homes	Ensure the definition of Older People's Housing Sheltered Housing and Extracare Housing is clear. Does not include care homes. It is suggested that wording within Table 7.1 is amended to the mentioned row is rewritten to simply state "Sheltered Housing and Extracare housing".	Noted – Care Homes are not housing, so it falls into the 'All other development definition'. This will be clarified.	Update charging schedule to read: This charge does not apply to residential institutions (C2)
PDCS19 Frontier Estates	Various issues and questions raised in relation to extra-care developments including: <ul style="list-style-type: none"> <li>• Density figures</li> <li>• Extracare Development and Zoning – the pricing zones are not appropriate</li> <li>• Build costs and revenues</li> </ul>	See separate paper which addresses this representation (Background Paper 1a).	Overall, this representation does not result in changes to the proposed CIL rates.

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	<ul style="list-style-type: none"> <li>Affordable housing assumptions</li> <li>Ground Rent Investment not justified – an uncertain income stream which is unreasonable to assume.</li> <li>Empty Property Costs not included</li> <li>Requests Angmering be reallocated out of Zone 2/3 and CIL rate proposed for Extracare reduced from £70/m2 to £0/m2.</li> </ul>		
PDCS20 Individual	<p>Concern relating to the delivery of infrastructure and identified funding gap.</p> <p>Include 5% administration contribution from CIL receipts.</p> <p>The Viability Evidence tests BEW at 3,000 but infrastructure evidence is for 2,300</p> <p>a)Introducing a flat rate CIL charge on all Strategic sites, of say £50.</p> <p>b) Introducing a CIL charging band for all larger houses &gt; 100 sq M, in all zones, adding the CDC text as per “This charge applies to the creation of one or more dwellings, and residential extensions or annexes which are 100 square metres or more gross internal area which are not</p>	<p>The CIL Guidance requires that charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put the levy in place. This can be evidenced by the ICSDP.</p> <p>The 5% is only taken from the total received in the first three years of CIL collecting and from year four onwards, 5% can be collected towards administration of CIL.</p> <p>The viability evidence has tested the site based on the full allocation as set out in Policy HSP2c.</p> <p>This is not supported by the viability evidence</p> <p>The CIL Viability Update report does not support a charge greater than £0 on strategic sites based on the development typologies tested. Further detailed viability testing on the size of residential units is not considered proportionate in relation to setting a CIL rate.</p> <p>Add the following text from Chichester District’s charging</p>	<p>No change</p> <p>See action above regarding CIL receipts calculation.</p> <p>No change</p> <p>No change</p> <p>No change</p>

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	<p>for the benefit of the owner/occupier.”</p> <p>d) Remove the Maximum tag from the charge schedule. It should be non-negotiable.</p>	<p>schedule under Table 7.1, with specific reference to the residential charges. “This charge applies to the creation of one or more dwellings, and residential extensions or annexes which are 100 square metres or more gross internal area which are not for the benefit of the owner/occupier.”</p> <p>This is to clarify that the charge applies on a per square metre basis to the creation of one or more dwelling, notwithstanding its size. However, only extensions and annexes that are over 100 square metres are liable for CIL (self build relief can be applied, where appropriate).</p> <p>Agreed</p>	<p>Add point of clarification</p> <p>Remove the Maximum tag from the charge schedule. It should be non-negotiable.</p>
PDCS21 Ford Landowners	Support the inclusion of strategic sites in Zone 1.	Noted	No change
PDCS22 Barnham and Eastergate Parish Council	<p>Suggest ADC introduce a CIL band for larger houses of greater than 100 sqm.</p> <p>The Parish Council supports a CIL Charging Policy as it gives parishes greater certainty. This certainty is beneficial when applying for grant funding as CIL funds will be usable as match funding (typically 50%).</p>	<p>CIL is charged per square metre on all new residential dwellings therefore if a house is larger than the average house it will pay more CIL.</p> <p>Noted</p>	<p>No change</p> <p>No change</p>
PDCS23 Sport England	Arun charge a nil rate for other uses including D2 uses that would incorporate sports facilities, as it would be	Agreed – this is implied by the final row on Table 7.1 which states <i>All other development</i> £0/m <sup>2</sup>	No change

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	<p>rarely viable for a community sports facility such as a leisure centre to pay CIL.</p> <p>Sport England would strongly encourage that ALL site specific requirements for both indoor sports facilities and outdoor sports facilities are excluded from the Regulation 123 list as Sport England would prefer contributions towards sport to continue to be secured through planning obligations.</p> <p>Only priority strategic projects should be placed on the 123 list</p>	<p>Noted</p> <p>Noted</p>	<p>Prepare Reg. 123 list accordingly</p> <p>Prepare Reg. 123 list accordingly</p>
PDCS24 Highways England	Requires funding to be in place for A27 schemes 3-5 years before the end of the Local Plan period to enable HE to undertake the necessary detailed design etc. If this is not possible, forward funding will need to be investigated.	Noted	Review ICSDP phasing
PDCS25 Landlink Estates	<p>Provide a Reg. 123 list</p> <p>Why are district wide infrastructure projects for example transport and secondary education proposed to be funded through S106?</p> <p>Considers there is no scaling back of S106 but continued reliance on it as the main source of infrastructure funding.</p> <p>Infrastructure list to be published with PDCS to allow robust viability testing.</p> <p>The non-strategic sites need to fund the infrastructure</p>	<p>To be provided at the Draft Charging Schedule consultation.</p> <p>The infrastructure evidence supporting the Local Plan requires transport and secondary education contributions from strategic sites, to ensure growth planned in the Local Plan is sustainable.</p> <p>This is true in the case of strategic sites.</p> <p>This will be published with the Draft Charging Schedule.</p> <p>There is no requirement for the CIL evidence base to</p>	<p>Prepare Reg. 123 list accordingly</p> <p>No change</p> <p>No change</p> <p>Prepare Reg. 123 list accordingly</p>



Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	gap  Concern regarding secondary education contributions being applied to non-strategic sites.	show that the funding gap will be met. The CIL Guidance requires that the evidence shows an aggregate funding gap to justify the preparation of a CIL charging schedule.  The approach taken to delivering secondary education is set out in the ICSDP, 2017. An updated process for seeking secondary education contributions is being considered but has not been finalised. Any change to the approach will be incorporated into the infrastructure evidence base update.	No change  No change
PDCS26 Landlink Estates	Comparison of S106 for strategic sites eg. Yapton paying £15,000 per dwelling for education questions the viability of CIL as a whole.	S106 costs have been worked out on strategic sites based on the infrastructure requirements generated by these sites. The CIL viability testing has been based on these S106 costs (as set out in the ICSDP, 2017). However, the currently unknown infrastructure costs relating to non-strategic sites will be funded partly by S106 (for on-site infrastructure) and CIL (based on an assumption that the average S106 costs will be £2,000 per unit).	No change
PDCS27 Bourne Leisure	Wish to see purpose-built rental or static caravan holiday units within holiday parks or holiday resorts specifically removed from the "residential" CIL rate. These types of developments pay business rates rather than council tax	It is correct that that particular type of development is used for holiday use if it is paying business rates and not council tax. It will be for the applicant to show provide this information to differentiate between residential and holiday uses.	No change
PDCS28 BEW Southern Consortium	Support Zone 1 nil rate	Noted	No change
PDCS29 and PDCS30 Church Commissioner s and Landlink – West of Bersted landowners	Support Zone 1 nil rate	Noted	No change

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
PDCS31 Gladman Developments Ltd	<p>The instalments policy should be linked to number of units rather than to the number of days after commencement.</p> <p>Clarification required in relation to the statement “In any event, CIL will be paid before a unit is occupied”.</p> <p>Exceptional circumstances should be set out in policy because there may be a need for an alternative strategic site. CIL may deem a potential strategic site unviable.</p> <p>When establishing a funding gap that CIL is intending to fill, it is vital that the Council take account of all income streams</p>	<p>This is the same approach adopted by other charging authorities. Commencement is defined in Regulation 67 of the Community Infrastructure Levy Regulations 2010 (as amended) as relating to the date given on the commencement notice submitted to the charging authority.</p> <p>Noted.</p> <p>The council will consider whether to implement discretionary relief following adoption of the Charging Schedule (para. 9.4 of PDCS, 2018)</p> <p>This is set out in the Infrastructure evidence, where it is possible to pinpoint all other forms of funding available.</p>	<p>No change</p> <p>Remove the statement because it is not realistic to assume that CIL will be paid prior to occupation in all cases.</p> <p>No change</p> <p>No change</p>
PDCS32 Kingston PC	<p>The reasoning for not using CIL for strategic sites but relying on S106 agreements was not made clear.</p> <p>The mechanisms by which future CIL monies will come to a parish with an adopted NP and what planning applications this would apply to are not made clear.</p> <p>To make it more easily understood it would benefit from the use of ‘plain English’.</p>	<p>See paragraphs 5.8-.510 of the CIL Viability Update Report, July 2018</p> <p>This will be set out as the implementation of CIL is finalised.</p> <p>A Q&amp;A will be prepared</p>	<p>Provide brief explanation charging schedule re. S106 vs. CIL</p> <p>No change</p> <p>Q&amp;A to be made available on the CIL webpages</p>

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
PDCS35 Pagham PC	Evidence out of date and prepared before the publication of the NPPF 2018.	The evidence is fully in line with the 2018 NPPF and updated NPPG. The only change in national policy is the use of the phrases Viability Threshold and Benchmark Land Value. They are the same thing but using different terminology.	No change
	Disclaimer note	Standard caveat saying that the report should only be used for the purpose of informing the preparation of the CIL charging schedule.	No change
	The CIL Viability Update Addendum 2018 adds nothing of consequence	Important clarification note regarding the difference between Littlehampton Economic Growth Area and the strategic housing allocation at West Bank.	No change
	No verification of the evidence to check the estimates and projections.	Consultants are used to provide objective and professional judgements and data.	No change
	No Reg. 123 list	An infrastructure list will be provided alongside the Draft Charging Schedule	Prepare Reg. 123 list accordingly
	Doesn't provide an up to date funding gap	Infrastructure evidence is subject to constant changes as the Local Plan is being implemented. This was accepted by the Planning Inspector in paragraph 197 of his report.	Updates to ICSDP where available.
	None of the areas (including Pagham) with strategic sites will receive CIL	The areas will receive S106 to deliver infrastructure to ensure planned development is sustainable.	No change
	Results in infrastructure from strategic sites being focused on district wide requirements.	The infrastructure requirements have been identified through the preparation of the Arun Local Plan which is the adopted development plan for the district	No change
		A CIL Charging Schedule can be reviewed and updated if	

Comment reference	Comment	ADC Response	Change to PDCS/evidence Required?
	<p>Assumes that the current sites with planning permission will be implemented in the short term. Doesn't allow for CIL to be charged if there are changes on the application site in the future.</p> <p>If all sites treated the same (CIL charged on all sites), there would be an opportunity for the charging authority not to charge CIL on any particular development or site.</p>	<p>there are changes to the way that strategic sites are being delivered.</p> <p>Although a CIL charging schedule can be updated and changed, a charging authority is not able to turn CIL on and off according to a site's specific viability issues. Once CIL is adopted, it is charged on all development and is a fixed rate. Changes to the Charging Schedule could take up to 12 months.</p>	<p>No change</p> <p>No change</p>

## APPENDIX 1a – RESPONSE TO PDCS19 FRONTIER ESTATES

### Development Density

It is suggested that the extracare housing is modelled at an overly high density. The basis of the modelling is as set out at 9.19 of the Local Plan Viability Study:

*A private sheltered/retirement scheme of 20 x 1 bed units of 50m<sup>2</sup> and 25 x 2 bed units of 75m<sup>2</sup> to give a net saleable area (GIA) of 2,875m<sup>2</sup>. We have assumed a further 20% non-saleable service and common areas to give a scheme GIA of 3,594m<sup>2</sup>. An extracare scheme of 36 x 1 bed units of 65m<sup>2</sup> and 24 x 2 bed units of 80m<sup>2</sup> to give a net saleable area (GIA) of 4,260m<sup>2</sup>. We have assumed a further 35% non-saleable service and common areas to give a scheme GIA of 6,554m<sup>2</sup>.*

Bearing in mind the typical format of such developments, which tend to be in walking distance of the town centres, are on average a 3 storey construction<sup>3</sup> this would result in a building footprint of about 2,000m<sup>2</sup>. The modelling assumes a 0.5ha (5,000m<sup>2</sup>) site so the site coverage is less than 50%. This is appropriate and allows for communal / shared gardens and limited parking.

### Pricing Areas

It is suggested by the representation that the pricing zones are not appropriate. The evidence that is provided to support this assertion relates to unrestricted market housing rather than extracare housing. Extracare housing is very different to market housing. As set out from 4.69 of the Local Plan Viability Study:

*Extracare housing is sometimes referred to as very sheltered housing or housing with care. It is self-contained housing that has been specifically designed to suit people with long-term conditions or disabilities that make living in their own home difficult, but who do not want to move into a residential care home. Schemes can be brought forward in the open market or in the social sector (normally with the help of subsidy).*

*Most residents are older people, but this type of housing is becoming popular with people with disabilities regardless of their age. Usually, it is a long-term housing solution. Extracare housing residents still have access to means-tested local authority services.*

This type of housing is quite different to either sheltered or retirement housing as care is provided. For the sake of clarity, the extracare housing modelled is assumed to be housing - with its own front door and self-contained. Institutional housing (including care homes) are not tested and fall under the “any other development” section of the proposed charging schedule.

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<sup>3</sup> Average taken from 6 extra care developments with planning permission (R/299/07; LU/173/16/PL; R/296/15/PL; LU/417/06; BR/400/06 and; EP/111/05).

Broadly, the values in the District vary between the coastal towns and the north. This differentiation formed the basis of the analysis in the Local Plan Viability Study so can be taken as read. Having said this, the opportunity is taken here to review the market. There is relatively little specialist older people's housing available for sale in the District at the time of this consultation, so it is necessary to look a bit more widely.

- McCarthy and Stone have a retirement scheme at Triton Worthing (close to the seafront) where 1 bedroom flats are selling from £265,000 and 2 bedroom flats from £355,000. These amounts are somewhat more than the assumptions used for sheltered housing in the viability assessment.
- McCarthy and Stone have a scheme that includes care at Neptune House where 1 bedroom flats are selling from £290,000 and 2 bedroom flats from £355,000. These amounts are somewhat more than the assumptions used for extracare housing in the viability assessment.
- McCarthy and Stone have a retirement scheme at St. Marys Road, Hayling Island where 2 bedroom flats are selling from £290,000. These amounts are somewhat more than the assumptions used for sheltered housing in the lower value areas in the viability assessment.
- The Renaissance Group have a scheme of retirement flats (over 55) at Station Road Rustington where prices start £465,000 (up to £580,000). Most of the scheme is 2 bed roomed units. These amounts are substantially more than the assumptions used for sheltered housing in the viability assessment.
- The Renaissance Group have a scheme at Fleur-de-Lis Arundel, 14 Fitzalan Road, Arundel, although no pricing information has been released.
- The scheme at Hale Lodge, Littlehampton is marketing 1 bed roomed flats from £223,000 and 2 bed roomed flats from £344,950. These amounts are somewhat more than the assumptions used for sheltered housing in the lower value areas in the viability assessment.

Having considered the prices being sought from active specialist older people's schemes, the assumptions used are considered appropriate.

#### Affordable Housing Revenues

The representation states that it is *unclear how the CILVU has arrived at the affordable housing revenues incorporated into the Extracare typology appraisals within Appendix 4.*

These are derived as set out from 4.39 of the Local Plan Viability Study.

#### Ground Rents

*The CILVU includes capitalised ground rent as investment revenue arising from development within Extracare typology appraisals. Unclear how this is calculated and it is considered to be a highly uncertain income stream.*

It is accepted that the derivation of the £3,850/unit figure is not clearly set out. This is based on an average rent of £190/year capitalised at 5%.

It is not considered to be an uncertain income stream. Over the last 20 or so years many new homes have been sold subject to a ground rent. Such ground rents have recently become a controversial and political topic. The Government has announced plans to reform ground rents – but it was confirmed (on 16th October 2018) that these will continue to be chargeable in relation to older peoples housing. It is therefore appropriate to take this into account.

### Marketing Costs

It is accepted that marketing costs can vary across developers. The assumption used is carried forward from the Local Plan Viability Study.

### Furniture Fixtures and Fittings

It is accepted that some developers fit out schemes to a lesser or to a greater extent.

In large part we would separate these costs to the trading / service part of the operation, with such costs appearing and being written down on the manager's balance sheet. The costs of such fixtures and fittings of the nature mentioned, would be covered through the 'sinking fund' charges in the service charges.

### Empty Property Costs

The developer suggests a cost of £300,000 to £360,000 to allow for power, staff, cleaning and maintenance of the facility over the period from the first sale to the last sale – this is because of the cost that can not be recovered through the service charges before all the sales are completed.

Whilst it is accepted that such a cost is not allowed for, as evidenced from the market survey many of the units are sold off plan, thus minimising such costs.

### Benchmark Land Value

The approach to establishing the BLV is commented on (and criticised). The EUV Plus approach used is strictly in line with the updated PPG and was confirmed through the consultation process (as recommended by the PPG). In the absence of any alternative approach being suggested it is difficult to comment.

### In summary

A range of comments have been made, however having considered these the approach remains sound and appropriate for moving forward with CIL.

**APPENDIX 2 – DRAFT CHARGING SCHEDULE SUMMARY OF REPRESENTATIONS DULY MADE IN ACCORDANCE WITH REGULATION 17**

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
DCS20191	Individual	No preference indicated	Comment	Concerned that strategic sites will pay S106 and not CIL. S106, unlike CIL, is negotiable, therefore there is greater chance of developers not paying S106.	The policy requirement on strategic allocation sites to pay for infrastructure through S106 is clear within the Local Plan and supporting Infrastructure Capacity Delivery Plan.	No Change
DCS20192	Individual	Yes	Comment	Infrastructure deficiencies should be funded by developers and landowners.	Infrastructure that is required to mitigate the impact of a development or the cumulative impacts of strategic development allocations, will be funded through S106 from those sites and therefore funding will be available as long as the requests meet the tests set out in Reg.122 of the CIL Regulations 2010	No Change
				The areas where the most new homes should pay the highest amount	CIL is based on viability evidence rather than the number of homes being built in an area.	No Change
				Scope of infrastructure funding should include putting in mains gas for those areas which do not have this; improved footways and bus services	The CIL Regulations allow Charging Authorities to spend CIL on infrastructure to support the development of its area. Therefore, it is possible to use CIL to fund improved utility infrastructure and bus services to support growth in the area and improved sustainable transport	No Change



Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
					measures for example.	
DCS20193	Individual	No preference indicated	Comment	Sites of 11 or more in Zone 4 are proposed to be charged £0/sqm. The impact of such developments on smaller parishes would have a disproportionate impact on infrastructure than in larger towns because smaller parishes have limited ability to raise income for infrastructure. Also, infrastructure matters are compounded by increased housing density. The CIL allocation would provide clarity and certainty for small councils when budgeting for amenity expenditure.	The viability evidence does not support a charge in this zone.	No change
DCS20194	Barnham and Eastergate Parish Council	No preference indicated	Comment	There has been no material change in the commercial viability of housing developments since 2015 when the proposed rate was £50/sqm. Therefore strategic sites should not be rated as £0 in the CIL Charging Schedule	The most up to date viability evidence (updated in 2018) does not support a CIL charge in Zone 1. The proposed rates consulted on in 2015 were not fully tested because the Draft Charging Schedule stage was not reached. The strategic housing allocations have significant policy requirements to meet and many of these will be delivered via S106 payments rather than via CIL.	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				Suggest as a minimum that ADC introduce a Zone 1 CIL charging band for larger houses of greater than 100sqm.	There is no evidence to support this approach. This could impact on the delivery of the housing mix suggested through the Updated Housing Needs Evidence which shows a need for 12.4% 4+ bedroom houses.	No change
				The infrastructure requirements in the villages adjoining the BEW Strategic Development are substantial. CIL money would provide greater certainty for the delivery of local infrastructure.	Preparation of an infrastructure list will assist in the identification of costs of infrastructure requirements. This list can be used to bid for CIL money.	No Change
DCS20195	Bognor Regis Town Council	No preference indicated	Comment	No Comment	N/A	N/A
DCS20196	Littlehampton Town Council	Yes	Objecting	Disappointed that development within the town centre would be unlikely to generate CIL receipts.	The viability evidence does not support a charge for town centre retail. Furthermore, the previous response to this representation remains - that CIL is only chargeable on the gross area of net new development, therefore CIL would not apply to conversions of town centre buildings to residential or retail units.	No Change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
DCS20197	Ferring Conservation Group	No	Objecting	Objects to zero rating developments of 11 or more dwellings in zone 4. It is likely that developers will use viability arguments to negotiate S106.	The viability evidence does not support a charge in this zone on developments of 11 or more dwellings. The Planning Practice Guidance states: "the price paid for land is not a relevant justification for failing to accord with relevant policies in the plan". The guidance gives little opportunity for site promoters to challenge S106 on viability grounds if the requests for S106 money are requested in order to ensure the site complies with the policies in the adopted local plan.	No Change
DCS20198	Individual	No	Comment	CIL would be payable at the start of the development whereas S106 is payable according to triggers. It could be 3 years before some contributions are forthcoming.	Please see the Draft Instalments Policy in section 8 of the Draft Charging Schedule.	No Change
				S106 could be subject to revisions pre or post the S106 agreement being finalised.	Any changes to the agreed S106 would need to be supported by robust evidence.	No Change
				Questions the CILVU 2018 - in particular the evidence to support £0 rate on strategic allocations.	The CILVU 2018 was prepared in strict accordance with the NPPF and National Planning Practice Guidance. It is not based on a site specific appraisal and is based on a typology approach. Therefore, the assessment does not take site specific tax relief matters into account.	No Change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				Architect costs are 6% of total costs	Overall 'professional fees' taken into account are 10%. These have been consulted on and are in the 'normal range'. The whole scheme requires design plus a range of other technical work that may be required through the planning process.	No Change
				2.5% abnormal contingency provision isn't appropriate for greenfield land?	The Planning Practice Guidance specifically mentions contingency. 2.5% is used on greenfield and 5% used for brownfield sites.	No Change
				Stamp duty will be partly or wholly rebated under quick succession relief when the property is ultimately sold to the end customer.	A scheme may take years to come forward/be sold. This is not taken into account in the appraisals.	No Change
DCS20199	Clymping PC	No preference indicated	Comment	Noted	N/A	N/A
DCS201910	Kingston PC	No preference indicated	Comment	Noted	N/A	N/A
DCS201911	Bognor Regis Regeneration Board	No	Support	Ensure that there is a transparent governance structure in place for spending and monitoring CIL	Section 10 of the Draft Charging Schedule explains that CIL income will be monitored and a report will be published on an annual basis in accordance with 62A of the CIL Regulations 2010 (as amended).	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
DCS20191 2	Historic England	No preference indicated	Comment	Suggests the council considers whether heritage related projects within the district are appropriate for CIL Funding	There will be opportunity for Historic England to provide a list of infrastructure projects that they wish to be funded by CIL.	No Change
				Rates proposed in areas where there are large groups of heritage assets at risk should not put at risk their re-use or heritage led regeneration	No evidence provided of areas in the district where this would be an issue.	No Change
				Promoting and encouraging a CIL relief in exceptional circumstances policy for development which benefits heritage assets and their setting.	There is currently no evidence to justify granting relief in this case. Robust evidence would be required to support this and to ensure the charging authority is satisfied that to grant relief would not constitute state aid.	No Change
				Ensure development specific contributions such as archaeological investigations continue.	On-site mitigation/site specific investigations/assessment required to make an unacceptable proposal acceptable in planning terms will still be required and will be funded by S106.	No change - clarify relationship between CIL and S106
DCS20191 3	Lichfields OBO Bourne Leisure	Yes	Objecting	Requires more detailed level of definition for the term 'residential'	There is scope to better define the definition of 'residential' however, purpose built holiday units clearly do not fall into residential therefore they will not be specifically listed in 'all other development' or as an exclusion from 'residential'.	Update the definition of 'residential' to - Residential does not include residential institutions including purpose built student accommodation

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				Suggests the following changes: 1. Include a specific definition of residential within the emerging charging schedule which sets out what uses are excluded from the residential category. This definition should clearly specify that purpose built holiday rental units or static caravan units within holiday parks or resorts are excluded from this CIL category or 2. Include Purpose built holiday rental units or static caravan holiday accommodation within holiday parks or resorts as a separate development category within Table 7.1 and confirm that this would incur a zero CIL rate.	Given that purpose built holiday rental units or static caravan units within holiday parks or resorts do not fall within the definition of 'residential' or 'retail', it is considered sufficiently clear that this type of development would fall into 'all other development' category.	No change
DCS201914	Individual	Yes	Comment	Build to rent is not considered as a distinct development type in the charging schedule although it is recognised as one in guidance.	The ALP 2018 does not have policies seeking the delivery of build-to-rent property and as such the CILVU2018 did not focus on undertaking specific assessment of this use. Where build to rent is included as an element of affordable housing provision, this will be eligible for relief from CIL.	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				The charging schedule should make it clear that build to rent and student accommodation schemes are rated for CIL as £0/sqm. This would be best expressed within the 'all other development' section.	Build to rent will fall into the 'residential' category. Paragraph 10.68 of the Arun District Council Local Plan Viability Study - January 2017 (ALPVS2017) states that <i>when assessed under the requirements of the NPPF and PPG, that student housing is unlikely to be viable</i> . This analysis was based on rents from 'purpose built' student accommodation set out in Table 4.14 of the ALPVS2017. This form of development is classed as C2 'residential institution' and therefore falls out of the charging schedule's definition of 'residential'.	Update the definition of 'residential' in the charging schedule to - Residential does not include residential institutions including purpose built student accommodation
				Build to rent classification should include a qualifying period where the use is proven to be used for rental purposes for 3 years, as it is for self-builders.	It is not intended that build to rent will fall into a separate category. Where the build to rent element of a development makes up the affordable housing contribution, it will be subject to social housing relief.	No change
DCS201915	Individual	Yes	Comment	CIL is a disincentive for small house builders	The CIL rates have been prepared in accordance with the CIL Regulations and Guidance and takes a consistent typology approach. It does not encourage or discourage a certain type of development.	No change
				CIL assumptions on land values don't include land already in housing use. The CILVU recognises the contribution that small sites (on existing residential plots) make to housing provision.	Infill developments/increased density on existing residential plots make up a low proportion of the overall housing supply needed to deliver the Arun Local Plan. See housing supply table provided in Appendix 3.	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				No price paid data for residential land or where yield is less than 10 units.	The data used was taken from policy compliant sales of land. Garden land is classed as greenfield, therefore is not policy compliant unless other material considerations outweigh the loss of greenfield/garden land.	No change
				Viability of developments of single units was raised as an issue. Suggests a £0 rate for single units.	It is necessary to take a consistent approach to determining viability across development types. No evidence is submitted to support a zero rate for single dwellings.	No change
				Not clear what the definition is for 'single greenfield' and 'single brown' are but for these to have RLV of £2.6million and £2million respectively seems very high.	See table 9.6 and Table 9.7 of the 2017 Local Plan Viability Study. This is a greenfield plot of 0.05ha. Single brown is a plot of 0.03 ha. The residual values should be read on a per hectare basis. Therefore single green would be £150,000 and single brown would be £100,000 for the plot.	No change
				The building of a single house can't benefit from economies of scale, therefore viability is more of an issue.	CIL must be set in a consistent way across development types and is not a tool to encourage or discourage a type of development. It is accepted that CIL is a cost - but in the overall scale of development it is modest (less than 5% of GDV as per tables 6.7a and 6.7b of the CILVU 2018). Contributions from the full range of sites will make an important contribution to the provision of infrastructure.	No change
				A builder could develop two flats on a site or one house. The CIL costs would be different.	This is a factor built into the modelling. Flats are more expensive to build (£/sqm and have areas of common space).	No change



Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
DCS201916	Individual	Yes	Comment	Discretionary relief should be included and consulted on.	There is no evidence to support the need to offer discretionary relief at this time.	No change
DCS201917	Highways England	No preference indicated	Comment	No further comments	Noted	N/A
DCS201918	Gladman Developments	No preference indicated	Comment	Payment of CIL sums for major development should be linked to the occupation of the number of units not related to commencement	A commencement date must be clearly stated as part of the CIL collection process. Therefore, setting an instalments policy based on commencement of development is the most practical and efficient method. It also allows for ease of monitoring. A policy based on occupation would be very difficult to monitor.	No change
				Encourages the council to introduce a discretionary relief policy	There is no evidence to support the need to offer discretionary relief at this time.	N/A
DCS201919	Gladman Developments	No preference indicated	Comment	The infrastructure funding gap - the council should take account of every possible income stream - NHB, council tax, business rates receipts. Take into account statutory undertakers asset management plans as these companies will upgrade systems/facilities.	Paragraph 016 of the CIL Guidance states that <i>The government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</i> It does not require full details of all funding streams/understanding of how each funding source will be spent over time.	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
DCS201920	MDAssociate s obo Haskins Garden Centre Ltd.	Yes	Comment	The council should clarify that garden centres are not included under the definition of retail warehouse	Policy RET DM2 of the ALP requires that a planning condition or obligation may restrict the goods sold <i>to goods other than convenience goods</i> . However, the retail warehouse definition covers large stores specialising in the sale of household goods, DIY items and other ranges of goods catering for mainly car borne customers (therefore, this restriction on the sale of goods is taken into account). It is considered garden centres fall into this category in that their use specialises in the sale of specific goods.	No change
DCS201921	Frontier Estates	Yes	Objecting	<p>Do not agree with the development densities tested for extra care housing.</p> <p>The examples of sheltered housing and extra care homes in the district undermines the approach within the CILVU</p> <p>Ground rents are considered to be an uncertain future income stream and are now excluded from valuation appraisals.</p> <p>No evidence of pre-sales in Arun</p> <p>Angmering shouldn't be included in zone 3. Market values in Angmering are comparable to Littlehampton and Bognor Regis.</p>	See response from HDH Planning and Development Ltd in Appendix 4	No change
DCS201922	Jackson Planning	Yes	Support, object and	Agree that there is an infrastructure funding gap	Noted	N/A

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
			comment	Supports the principle of strategic sites being nil rated	Noted	N/A
				The overall package of S106 contributions and CIL contributions needs to be consistent across both strategic and non-strategic sites to avoid either development type bearing disproportionate costs	The S106 requirements for the strategic sites are provided in the Infrastructure Capacity Study and Development Plan 2017 (ICSDP 2017) and any updates to this are set out in the Infrastructure Funding Gap Update Report Amendment April 2019. If there is a lack of clarity on how Non-Strategic Sites will contribute towards infrastructure requirements, this will need to be clarified within a supporting paper.	No change - clarify relationship between CIL and S106
				Need certainty regarding delivery of appropriate mitigation to support the strategy of the adopted Arun Local Plan	This is provided through the ICSDP 2017 where possible, and through any future updates.	No change
				Supports the publication of the Reg. 123 list	Noted	N/A
				Large ticket infrastructure items within the District such as Education, Transport and Healthcare were all items that were anticipated to be paid for through S106. This position has now changed and the Regulation 123 list now includes some education provision for non-strategic sites.	The evidence based used to assess the cumulative impact of the strategic housing sites has identified a range of large ticket items which the strategic sites must fund to mitigate their impacts. This includes a new 10FE secondary school. These requirements are set out in the ICSDP 2017 and the Funding Gap Update Amendment April 2019. The large ticket infrastructure requirements are also set out within the planning policies for each strategic site. However, non-strategic	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
					sites will also have an additional impact on infrastructure, including education provision (when taking into consideration the cumulative impacts of Non-Strategic housing allocations, 'deliverable' HELAA sites and the windfall allowance). Where these sites are shown to have an impact (for example the possible requirement of a second new secondary school), the infrastructure requirements will be identified by service providers and bids for CIL funding will be made towards those items. To avoid double dipping, the Regulation 123 list clearly states that CIL will only pay for the infrastructure requirements where they are required 'other than site specific requirements' ie. will not apply to S106 projects.	
				The Reg. 123 list includes some education provision for non-strategic sites. This is not the case for transport.	The education element of infrastructure provision has been considered in detail by ADC and WSCC and this is clearly explained in the Infrastructure Funding Gap Update Amendment Report April 2019 and the WSCC/ADC Secondary Education Position Statement	No change
				The Local Plan made it clear that District wide infrastructure should be provided by CIL. The draft CIL charging schedule cannot change adopted local plan policy	Policy INF SP1 does not restrict district wide infrastructure from being funded by S106 by the Strategic Sites.	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				No evidence is available to support the Reg. 123 list.	The evidence is available in the ICSDP2017, The Arun Local Plan 2018 policies, the Infrastructure Funding Gap Update Amendment Report April 2019. However, in some cases, the addition of the phrase 'other than site-specific requirements' should be added.	No change - clarify relationship between CIL and S106
				It is not clear why District wide infrastructure projects for example transport schemes are proposed to be funded through s106 from strategic sites only, against the advice of the Local Plan Inspector and as set out in INF SP1	This is not the intention of Policy INF SP1. The strategic site policies are clear in their site requirements for mitigating cumulative impacts.	No change
				Considers ADC does not intend to scale back s106 and they continue to rely on S106 as the main source of infrastructure funding	This is not the case but may need to be clarified within the DCS	No change - clarify relationship between CIL and S106
				It is not clear from the evidence in the consultation papers about the extent of additional financial burdens on the strategic development sites given the limited extent to which CIL will fund infrastructure.	Please see Appendix 4 of the CILVU 2018 that shows how S106 payments have been incorporated into the viability assessment of the strategic housing allocations.	No change
				The council rely largely on s106 to secure development in the district. Pooling restrictions remain.	Agree	No change

Comment Reference	Individual/ Consultee	Wish to be heard by the Examiner?	Comment/ Objection /Support	Summarised Comment	ADC Response	Change to DCS/Evidence Required?
				The need for additional secondary school provision has not been examined as part of the development plan process. The CIL examination should not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant Plan. The further secondary education provision on the Reg.123 list places an unfair burden on strategic sites who are required to support districtwide secondary school infrastructure. This was ruled out by the Inspector who considered the Local Plan.	Please see ICSDP 2018 and Funding Gap Update Amendment Report April 2019. Agree that infrastructure issues can not be re-opened but the infrastructure requirements must be taking into account. Please see the revised PPG on Planning Obligations (Para 007 Ref ID 23b-007-20190315)	No change
				£2,000 per unit assumed S106 on non-strategic sites is considered to be too low. References Table 4.13 of the CILVU	Non-strategic sites will only pay for on-site mitigation requirements once CIL is being implemented. This will reduce S106 payments considerably to on-site provision of open space/play.	No change - clarify relationship between CIL and S106
				Considers that strategic sites will potentially have to make up the funding gap through S106 payments.	There is no evidence to show that this is the case.	No change
				There are items on the Reg. 123 list which do not have a funding gap identified. Therefore there is potential for double dipping. There is no evidence in the IFGU that these items need funding by CIL.	See above response regarding the evidence relating to the Reg. 123 list	No change - clarify relationship between CIL and S106

## **APPENDIX 3 – RESPONDING TO COMMENT ON THE DRAFT CHARGING SCHEDULE – LEGAL AND VIABILITY ADVICE**

### **1.0 The Question:**

1.1 The Community Infrastructure Levy Viability Update Report July 2018 Tables 6.1a&b, 6.2, 6.3a&b to 6.7a&b all have figures for agriculture, paddock and industrial land.

1.2 No examples are given for land which is already in a housing value use e.g. part of an existing residential garden or outbuildings etc. or housing land which might be redeveloped more intensively.

### **2.0 ADC Response:**

2.1 It is correct that land which is already in a housing value use has not been tested through the CIL Viability Update 2018. This is because redeveloping land with existing housing on it would generally generate a negligible CIL charge because CIL is only charged on net additional floorspace and exemptions can be applied. Net additional dwellings from this land use will occur but the proportion of net additional dwellings from this source is very low (see further below) and is normally likely to be resisted by policies in the adopted Arun Local Plan 2018 (The ALP). This is because the ALP considers garden land as a contributor to Green Infrastructure (para 7.3.8 point 5) and ensuring that density from development has sufficient amenity space (Policy D DM4 Extensions and alterations to existing buildings (residential and non-residential)).

2.2 Furthermore, the NPPF defines garden land as greenfield (see Glossary for Previously Developed Land). Greenfield land should not be subject to development unless there are overriding reasons supporting the development of the land. This may include land that has been specifically assessed as a housing allocation for example. Where this is the case, detailed appraisal will have been carried out, including Sustainability Appraisal, where applicable.

2.3 The main points to consider when understanding the impact of not testing existing residential garden land in the viability assessment is whether this will impact upon the delivery of the relevant plan - the ALP. This is covered in more detail below.

### **3.0 What is the supply needed to deliver the ALP?**

3.1 Table 1 below shows what proportion of sites, which are required to meet the housing supply target (as set out in Table 12.1 of the ALP) are forecast to be on existing residential land. This table is informed by the council's most up to date Housing and Employment Land Availability Assessment (HELAA) and the work emerging as part of the Non-Strategic Sites DPD.

<b>Table 1: Housing Supply from Existing Residential Land</b>			
<b>No.</b>	<b>Supply of Net Additional Homes – Ref. Table 12.1</b>	<b>Supply Total – Ref Table 12.1</b>	<b>Existing un-consented Residential Land included in supply.</b>
1	<b>Completions</b> – dwellings already completed which provide a net addition to the housing stock.	3,669	N/A – sites already completed.
2	<b>Commitments</b> (large sites) – dwellings that will provide a net addition to the housing stock on sites that already have planning permission.	3,050	N/A – these commitments were taken to count towards overall supply for the ALP. All future commitments will be made up of the supply from 4-8 below.
3	<b>Commitments</b> (small sites) - dwellings that will provide a net addition to the housing stock on sites that already have planning permission.	251	N/A – these commitments were taken to count towards overall supply for the ALP. All future commitments will be made up of the supply from 4-8 below.
4	<b>Neighbourhood Plan Allocations</b> – sites included as allocations made in Neighbourhood Plans which are yet to be developed	421 (these sites are expected to deliver 2% of the overall housing supply).	Of the ‘made’ neighbourhood plan allocations counted towards this supply figure, there are <b>39</b> units that do not currently have planning permission, that are on existing residential land.
5	<b>‘Deliverable’ HELAA sites</b> – sites located within the Built up Area Boundaries which are identified as being available and deliverable through the HELAA.	530 (these sites are expected to deliver 2.5% of the overall housing supply).	There are <b>100</b> ‘deliverable’ HELAA dwellings on existing residential land.
6	<b>Windfall Allowance</b> – reflecting the projected contribution to be made by ‘windfall’ sites to the housing supply over the plan period, based on monitoring data.	847	The windfall allowance does not include sites that are built on garden land.
7	<b>Strategic Allocations</b> – Sites of more than 300 dwellings allocated for development through the Local Plan	10,750	N/A – these sites have been individually tested through the CILVU 2018 and do not include existing residential land.
8	<b>Non-Strategic Allocations</b> – the majority of sites will accommodate less than 300 dwellings and be allocated through Neighbourhood Plans or a Non Strategic Sites Allocations DPD	At least 1,250	The NSS is currently being prepared. Out of the sites being tested through the emerging allocation process, <b>50</b> units are on existing residential land.
	<b>Total</b>	<b>20,768</b>	

3.2 Overall, 189 units out of 20,768 units are on existing residential land. This is less than 1% of the housing supply figure. Therefore, the delivery of the Arun Local Plan does not rely, to a significant extent, upon the development of site on existing residential land.

END



## **APPENDIX 4 – RESPONSE TO DCS201921 FRONTIER ESTATES (PREPARED ON BEHALF OF ARUN DISTRICT COUNCIL BY HDH PLANNING AND DEVELOPMENT LTD)**

### Background and Context

The definitions of Sheltered and Extracare are critical. Towards the end of Chapter 4 of the 2017 Viability Assessment the relevant definitions were set out:

*Sheltered or retirement housing is self-contained housing, normally developed as flats and other relatively small units. Where these schemes are brought forward by the private sector there are normally warden services and occasionally non-care support services (laundry, cleaning etc.) but not care services.*

*Extracare housing is sometimes referred to as very sheltered housing or housing with care. It is self-contained housing that has been specifically designed to suit people with long-term conditions or disabilities that make living in their own home difficult, but who do not want to move into a residential care home. Schemes can be brought forward in the open market or in the social sector (normally with the help of subsidy).*

*Most residents are older people, but this type of housing is becoming popular with people with disabilities regardless of their age. Usually, it is a long-term housing solution. Extracare housing residents still have access to means-tested local authority services.*

We stress that the modelling assumes that both these definitions fall within C3. The proposed rates of CIL would not apply to any accommodation that does not fall within Use Class C3. In the terms of the adopted *Policy H DM2 Independent living and care homes*, the modelling does not cover Day care facilities Nursing homes, and Specialised care units.

The NPPF and the PPG have been updated since the viability work was undertaken. The updated NPPF and PPG substantially limit the scope for viability testing at the development management stage (at 10-007-20190509 and 10-008-20190509). This is welcomed but it is particularly notable that paragraph 10-007-20190509 specifically makes an exception for ‘housing for older people’ and allows this type of housing to be subject to site specific viability testing when a planning application is submitted.

Whilst no reason is given for this flexibility, it is clear that such housing comes forward under a plethora of different models which can be challenging to capture in a high level plan-wide viability study. Whilst site specific viability testing is not going to apply to CIL (as CIL once set is fixed) it can be used to provide some flexibility in the affordable housing requirements. Having said this, it is still important to get the rates right.

It is timely to comment that the updated PPG uses the phrase 'Benchmark Land Value' (BLV). This is the equivalent to the phrase 'Viability Threshold' that is used in the viability evidence.

### Modelling

As set out in the 2017 Viability Assessment the modelling is based on the following assumptions:

*We have modelled a private sheltered/retirement and an extracare scheme, each on a 0.5ha site as follows.*

*A private sheltered/retirement scheme of 20 x 1 bed units of 50m<sup>2</sup> and 25 x 2 bed units of 75m<sup>2</sup> to give a net saleable area (GIA) of 2,875m<sup>2</sup>. We have assumed a further 20% non-saleable service and common areas to give a scheme GIA of 3,594m<sup>2</sup>.*

*An extracare scheme of 36 x 1 bed units of 65m<sup>2</sup> and 24 x 2 bed units of 80m<sup>2</sup> to give a net saleable area (GIA) of 4,260m<sup>2</sup>. We have assumed a further 35% non-saleable service and common areas to give a scheme GIA of 6,554m<sup>2</sup>.*

It is accepted that extracare housing can come forward under a wide range of different formats and models (as acknowledged in the PPG).

The point made on the modelling is that the densities used are too high. It accepted that some development comes forward at lower densities.

The analysis is based on a 0.5ha sites (i.e. a site that is just over an acre). In line with the wider study a BLV of £720,000/ha is used. This is derived using the EUV Plus approach, where the EUV is £600,000/ha and the plus is 20%.

At a CIL rate of £70/m<sup>2</sup> the brownfield site in Arundel generates a Residual Value of £1,294,000. If development came forward at, say half that density assumed, this would be the equivalent of £1,294,000/ha. This is about 80% above the BLV so demonstrates that there is still considerable scope for CIL.

### Development costs

In modelling the development we have taken a cautious approach. Whilst the development of Sheltered Housing and Extracare housing is essentially the development of flats, albeit with additional circulation and common space, the costs applied are not the BCIS flatted development costs.

At the time of the study the cost of flatted development was £1,478/m<sup>2</sup>. The cost applied to sheltered housing was for 'Supported Housing' being £1,641/m<sup>2</sup>, and the costs applied to Extracare was that for 'Care Homes for the elderly' being £1,778/m<sup>2</sup>. The costs used for extra care are £300/m<sup>2</sup> / 30% greater than for conventional flatted development.

## Values

The approach to establishing values is criticised – and is claimed to be highly irregular. This is rejected.

When establishing the worth of development it is necessary to look at a wide range of sources. In areas where there is limited information it is necessary to look more widely. Housing market boundaries and value areas do not follow strict administrative boundaries and to imply that they do shows a misunderstanding of the market and how to approach property valuation. A range of values were presented from new build schemes in the area. It is important to note that these are not the correct reference point. The correct reference point is that of a 3 bed semi-detached house. HDH used the median value of 3 bed. It is notable that median is now over £450,000 (Based in Rightmove data).

In the Viability Studies the values of older peoples housing was established as suggested by the RHG's representations. The values were challenged at the PDCS stage. A thorough review of local values was undertaken as set out in the Council's PDCS Response. This is criticised nor not including extra care housing – however no alternative evidence is provided.

The appraisals do include ground rents. In October 2018 the Government commenced a consultation on the future of ground rents, this followed a consultation in 2017. The outcome of this is not yet known, however it has been suggested that ground rents will be able to continue for older peoples housing.

It is wrong to suggest that the RICS Redbook excludes ground rents. Clearly the treatment of ground rents is a property specific matter but *RICS professional standards, global RICS Valuation – Global Standards 2017* does not exclude ground rents. It is important to note that the viability assessment is not a Redbook valuation.

The marketing costs were tested through the consultation process and the 2017 Viability Assessment was examined as part of the Local Plan process. Whilst some developers may well take a a different approach, it is appropriate to use base the costs on the those put forward.

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## **Community Infrastructure Levy**

### **Draft Charging Schedule**

## **STATEMENT OF MODIFICATIONS**

**PREPARED IN ACCORDANCE WITH REGULATION 19 OF THE  
COMMUNITY INFRASTRUCTURE REGULATIONS 2010 (AS  
AMENDED)**

**MAY 2019**

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

## 1. INTRODUCTION

- 1.1 This Statement of Modifications set out the modifications which Arun District Council has made to its Community Infrastructure Levy (CIL) Draft Charging Schedule since it was published for consultation between 21<sup>st</sup> March 2019 and 2<sup>nd</sup> May 2019 in accordance with Regulation 16.
- 1.2 It has been issued in accordance with Regulation 19(1)(d) of the Community Infrastructure Regulations 2010 (as amended). No substantive changes have been made to the Draft Charging Schedule.
- 1.3 Before the Draft Charging Schedule is submitted to the Examiner, a copy of the Statement of Modifications will be sent to the consultation bodies invited to make representations on the Preliminary Draft Charging Schedule in accordance with Regulation 15. The Statement of Modifications will also be published on the Arun District Council website: [www.arun.gov.uk/cil](http://www.arun.gov.uk/cil) in accordance with Regulation 19 (4).
- 1.4 The Statement of Modifications will be available for comment for a four week period from **31<sup>st</sup> July 2019** in accordance with Regulation 21 (5)(a).

## 2. REQUESTS TO BE HEARD

- 2.1 Any person may request to be heard by the Examiner in relation to the modifications as set out in the Statement of Modifications. Only comments made and requests to be heard on these proposed modifications can be considered at this stage. Requests to be heard must include:
  - Details of the modifications on which you wish to be heard (by reference to the Statement of Modifications) and
  - Whether you support or oppose the modifications and why.
- 2.2 The Council will submit a copy of each request it receives to the Examiner, via the Programme Officer. Requests to be heard may be withdrawn at any time by giving notice in writing to the Council. Requests to be heard by the Examiner must be made in writing by **28<sup>th</sup> August 2019** to:

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

Or by email to [localplan@arun.gov.uk](mailto:localplan@arun.gov.uk)

### 3. PROPOSED MODIFICATIONS

3.1 Table 1 below sets out the Council’s proposed modifications to the Arun Community Infrastructure Levy (CIL) Draft Charging Schedule. ~~Strikethrough~~ has been used to represent a deletion. **Bold** has been used to represent text to be added.

Modification Number	Document Reference	Modification	Reason for Modification
1	Section 1 “Consultation Details”	<p>Delete all text in Section 1 Consultation Details</p> <p>Add:  <b>This is the Submission Version of the Arun CIL Draft Charging Schedule (the DCS) June 2019.</b></p> <p><b>This version of the DCS is based on that which was consulted on between 21st March 2019 and 2nd May 2019. It includes modifications deemed necessary as a result of the consultation process as well as those identified to ensure that the DCS is as up to date as possible and to correct any drafting errors. Where text is to be deleted, the text is shown with <del>strikethrough</del> and where text is to be added, it is shown in bold. It should be read alongside the Statement of</b></p>	<p>Consultation details are no longer relevant. An explanation of the status of this version of the DCS is required and sets out how additional and deleted text is shown.</p>

Modification Number	Document Reference	Modification	Reason for Modification
		<p><b>Modifications which has been prepared in accordance with Regulation 19 of the CIL Regulations 2010 (as amended).</b></p> <p><b>It is intended that this version of the DCS will be submitted to the Examiner on or around the 31st July 2019.</b></p>	
2	Paragraph 2.1	This <del>consultation</del> document sets out Arun District Council's proposed charging rates for its Community Infrastructure Levy	Update required as this is no longer a consultation document.
3	Paragraph 2.2	The responses from the consultation <del>have been</del> <b>were</b> considered and any changes to the PDCS, deemed necessary, <del>have been</del> <b>were</b> incorporated into this consultation document, entitled the Arun Draft Charging Schedule (DCS).	Update to account for previous consultation having taken place.
4	Paragraph 2.4	Delete full paragraph and replace with:  <b>The Draft Charging Schedule was published for consultation on 21<sup>st</sup> March 2019 until 2<sup>nd</sup> May 2019 in accordance with Regulation 16 of the CIL Regulations 2010 (as amended). All representations have been taken into account by Arun District Council (as set out in the Statement of Representations) to produce this</b>	To ensure the CIL Draft Charging Schedule is up to date following Publication.



Modification Number	Document Reference	Modification	Reason for Modification
		<b>version of the Draft Charging Schedule for submission to the CIL Examiner in accordance with Regulation 19 of the CIL Regulations 2010.</b>	
5	Paragraph 2.5	<del>As set out above,</del> The relevant evidence is available on the council's website <a href="http://www.arun.gov.uk/cil">www.arun.gov.uk/cil</a>	For clarification due to the deletion of para 2.4 text.
6	Paragraph 2.5	and an Infrastructure Funding Gap Update paper <b>(as amended in April 2019)</b>	To ensure the most up to date evidence base is referenced.
7	Paragraph 4.2	CIL is charged per square metre whatever the size of the development <b>dwelling.</b>	To clarify/differentiate between development and the creation of one dwelling.
8	Paragraph 4.4	The CIL Guidance (last updated, March 20189)	To update the text.
10	Paragraph 4.7	CIL Guidance (2014, last updated March 20189)	To ensure document is up to date.
11	Paragraph 4.7	<b>For further detail on CIL and S106 spending, see Regulation 123 list and supporting text in Appendix 2</b>	To ensure the Reg.123 list is attached and text is provided to explain the relationship between CIL and S106.
12	Paragraph 5.3	This is called the Infrastructure Funding Gap Update Report (March 2019) (IFGU) <b>(as amended April 2019) (IFGU)</b>	To ensure reference to the evidence base is up to date.
13	Paragraph 5.4	<del>£304 million</del> <b>£319.55 million</b>	To ensure the funding gap figure is up to date and correct in relation to funding gap evidence and Table 5.1.
14	Paragraph 5.5	<del>Although, there may be challenges</del>	To date, there has been no

Modification Number	Document Reference	Modification	Reason for Modification
		<del>involved in delivering strategic infrastructure for the larger strategic sites in light of the pooling restrictions set out by Regulation 123 of the CIL Regulations, it is anticipated that changes to the pooling restrictions in the future as proposed in the Supporting housing delivery through development contribution consultation will assist with the council's approach.</del>	timetable given for the changes to the CIL Regulations. Therefore, reference to the removal of Regulation 123 is premature.
15	Paragraph 5.6	<del>consultation document</del>	This is no longer a consultation document.
16	Paragraph 5.7	<del>This includes the preparation of funding gap updates. In particular, the evidence will need to take account of local infrastructure requirements as the council moves forward with the preparation of the Non-Strategic Sites DPD (the NSS). It is anticipated that most infrastructure needs will be secured on-site via S106 but cumulative/strategic infrastructure projects will require CIL funding.</del>	Further work is required to assess the infrastructure requirements arising from the NSS DPD. It is considered more appropriate to set out the relationship between CIL and S106 alongside the Reg. 123 list in Appendix 2.
17	Table 5.1	Update the "Social and Leisure" and "Totals" row in accordance with the Infrastructure Funding Gap Update April 2019	To ensure Table 5.1 is accurate, correct and aligns with the infrastructure evidence.
18	Paragraph 6.8	<del>Table 2</del> <b>Table 6.1</b>	To ensure reference within the document is correct.
19	Paragraph 6.8	(north and south of the A259). <b>It must be made clear that the Built Up Area</b>	For reasons of clarity that the charging zones are set and should

Modification Number	Document Reference	Modification	Reason for Modification
		<b>Boundary (BUAB) lines on the ALP Policies Maps have been used as a guide for delineating between the urban and rural zones. In cases where the BUAB is extended, to incorporate Neighbourhood Plan allocations for example, in accordance with paragraph 7.2.8, the charging zone boundary will not be changed.</b>	not be treated as per the BUAB policy.
20	Table 7.1	Residential*[1] Older People's Housing Sheltered Housing and Extracare Housing [2] Supermarkets and Retail Warehouse [3]	To allow for the addition of notes to sit alongside these development types for reason of clarification.
21	Between Para 7.3 and 7.4	<b>[1] Residential does not include residential institutions including purpose built student accommodation</b>	To clarify definition of residential. This will have consequential impacts on paragraph numbering and in response to DCS2014
22	Para. 7.4	<b>[2]</b>	To clarify the definition in relation to Table 7.1 and in response to representation DCS201921
23	Paras 7.5 and 7.6	Merge both paragraphs and start paragraph with <b>[3]</b>	To clarify the definition in relation to Table 7.1 and in response to representation DCS201920
24	Para. 8.1	<b><del>The following instalments policy is suggested in the report and presented below for comment:</del> In accordance with Regulation 69B of the CIL Regulations 2010 (as amended), the council will implement the instalments policy below which will allow persons</b>	For clarification purposes.

Modification Number	Document Reference	Modification	Reason for Modification
		<b>liable to pay CIL by instalments. This policy will take effect on the same date that the Charging Schedule takes effect in accordance with Regulation 28 of the CIL Regulations 2010.</b>	
25	Table 8.1	Three <b>equal</b> instalments Four <b>equal</b> instalments Five <b>equal</b> instalments	For clarification purposes.
26	Following Appendix 1	Add Appendix 2 – Infrastructure List (as required under Reg. 123 of CIL Regulations 2010).	For clarification purposes and in response to DCS201922



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## 1 Arun Draft Charging Schedule June 2019 (Submission Version)

**1.1** This is the Submission Version of the Arun CIL Draft Charging Schedule (the DCS) June 2019.

**1.2** This version of the DCS is based on that which was consulted on between 21st March 2019 and 2nd May 2019. It includes modifications deemed necessary as a result of the consultation process as well as those identified to ensure that the DCS is as up to date as possible and any drafting errors have been corrected. Where text is to be deleted, the text is shown with ~~strikethrough~~ and where text is to be added, it is shown in bold. It should be read alongside the Statement of Modifications which has been prepared in accordance with Regulation 19 of the CIL Regulations 2010 (as amended).

**1.3** It is intended that this version of the DCS will be submitted to the Examiner on or around the 31st July 2019.

~~1.4 This consultation on the Arun Draft Charging Schedule (DCS) March 2019 is the second stage in preparing a CIL Charging Schedule. The second round of consultation is called "publication". This means that, subject to the council agreeing to submit the draft charging schedule, all representations received at this stage along with a Statement of Modifications, if needed, will be sent to the CIL examiner. Furthermore, all respondents to the consultation will have the right to be heard by the CIL examiner on both the Draft Charging Schedule and on the Statement of Modifications, if it is needed~~

~~1.5 Comments on the Draft Charging Schedule should be made via the Objective Consultation portal at <http://arun.objective.co.uk/portal> or emailed to [Localplan@arun.gov.uk](mailto:Localplan@arun.gov.uk).~~

~~1.6 Written comments can also be sent to the following address:~~

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

~~1.7 For any queries, call 01903 737500 and ask for Planning Policy.~~

~~1.8 This document will be published for a six week consultation period starting 21st March 2019 to 5pm on 2nd May 2019.~~

## 2 Introduction

### 2 Introduction

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

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

**2.3** The first round of consultation was on the Preliminary Draft Charging Schedule (PDCS) and took place from 10th December 2018 until 21st January 2019. The responses from the consultation ~~have been~~ **were** considered and any changes to the PDCS, deemed necessary, ~~have been~~ **were** incorporated into this consultation document, entitled the Arun Draft Charging Schedule (DCS).

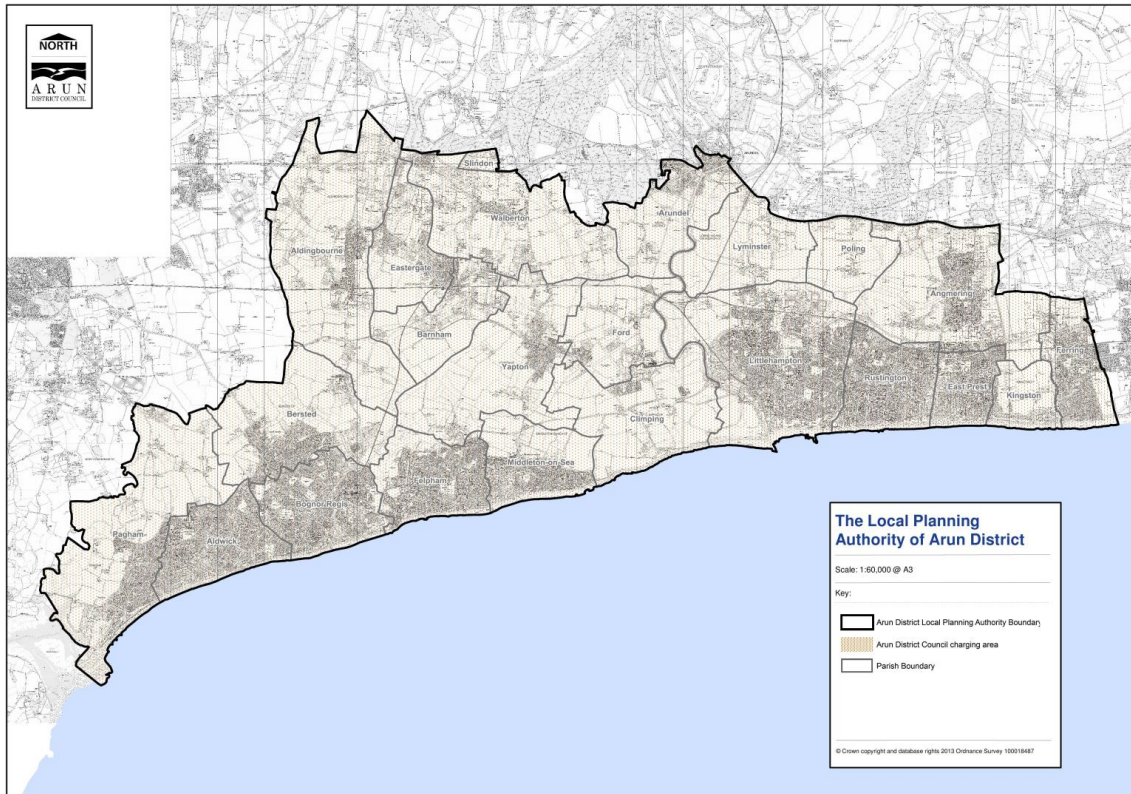
**2.4** ~~The DCS differs only slightly from the PDCS because it has been updated to take into account representations that identified changes required to ensure the document is sound and robust and also includes clarifications regarding definitions of some development types. All relevant supporting evidence along with a Statement of Representation Procedure is available on the Arun District Council website [www.arun.gov.uk/cil](http://www.arun.gov.uk/cil) and hard copies are available to view at all libraries within Arun District (outside the South Downs National Park) and at the Arun Civic Centre and Bognor Regis Town Hall during the DCS consultation period.~~ **The Draft Charging Schedule was published for consultation on 21st March 2019 until 2nd May 2019 in accordance with Regulation 16 of the CIL Regulations 2010 (as amended). All representations have been taken into account by Arun District Council (as set out in the Statement of Representations) to produce this version of the Draft Charging Schedule for submission to the CIL Examiner in accordance with Regulation 19 of the CIL Regulations 2010.**

**2.5** The CIL Guidance requires that charging authorities will implement the levy where their evidence has been prepared based on a relevant Local Plan. Arun District Council adopted the Arun Local Plan 2011-2031 (ALP 2018) on 18th July 2018. The ALP 2018 identifies the quantum and type of development planned to meet housing and employment needs within the district over the Plan period. It also allocates strategic housing and employment sites. The ALP 2018 is underpinned by the Infrastructure Capacity Study and Delivery Plan, 2017 (ICSDP) which identifies the infrastructure required to achieve local development and growth needs. This evidence base is considered to be a 'living' document because updates are required regularly as the Local Plan is implemented. ~~As set out above,~~ The relevant evidence is available on the council's website [www.arun.gov.uk/cil](http://www.arun.gov.uk/cil) and an Infrastructure Funding Gap Update paper (**as amended in April 2019**) has been prepared to sit alongside the ICSDP.



## 3 The Charging Area

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



## 4 What is CIL?

### 4 What is CIL?

**4.1** The legislative framework for CIL is provided by Part 11 (Sections 205-225) of the Planning Act 2008 and the CIL Regulations 2010 subject to subsequent amendments.

**4.2** CIL is a mandatory charge on new development, calculated on the change in net additional floorspace (m<sup>2</sup>), which local authorities can introduce. The charge is non-negotiable in most circumstances. The charge applies on a per square metre basis to new development of over 100m<sup>2</sup> of gross internal floorspace. In the case of new dwellings, there is no such threshold - CIL is charged per square metre whatever the size of the ~~development~~ **dwelling**.

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

**4.4** The CIL Guidance (Last updated, March 2018<sup>9</sup>) states that in setting CIL rates, the charging authority "will need to be able to show why they consider that the proposed levy rate or rates set an appropriate balance between the need to fund infrastructure and the potential implications for the economic viability of development across their area".

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

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

- the examiner’s recommendations are published
- the charging authority considers the examiner’s recommendations
- the charging authority approves the charging schedule

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

**4.7** Revenues can be passed to other bodies to deliver infrastructure. A schedule of infrastructure to be funded by CIL should be published alongside the Charging Schedule, at examination, in accordance with Regulation 123 of the CIL Regulations 2010. CIL guidance (2014, last updated March 2018<sup>9</sup>) sets out that when an authority introduces the levy, Section 106 requirements should be scaled back to those matters that are directly related to a specific site, and are not set out in a Regulation 123 list. Section 106 agreements will still be used to cover requirements such as the provision of affordable housing, local open space, access roads, habitat protection etc. In addition, S106 will still be used to deliver infrastructure deemed necessary to support the delivery of the strategic housing sites allocated within the Arun Local Plan. **For further detail on the relationship between CIL and S106 spending, see the Regulation 123 list and supporting text in Appendix 2.**

**4.8** Transparency on the spending of CIL is required by the CIL Regulations 2010. Further detail regarding monitoring of CIL spending is set out in Section 10 of this document.

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

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

**Table 4.1**

## 5 Infrastructure Evidence

### 5 Infrastructure Evidence

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

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

**5.3** The infrastructure evidence which underpins the ALP, 2018 was published in February 2017. The ICSDP identifies site specific infrastructure requirements as well as district wide infrastructure needs resulting from planned growth in the district. It is widely acknowledged that infrastructure evidence is subject to constant change (and the Planning Inspector stated in paragraph 197 of his report on the ALP that *the [ICSDP] is intended to be a living document as the ALP is implemented*). Since the PDCS consultation, Arun District Council has received a number of updates in relation to infrastructure requirements. Therefore, it has been necessary to prepare a supplementary paper to sit beside the ICSDP which provides an update on the overall infrastructure funding gap. This is called the Infrastructure Funding Gap Update Report (~~March 2019~~) (IFGU). **(as amended April 2019 (IFGU))**.

**5.4** Taking the results of the IFGU, the total estimated infrastructure costs and existing funding secured, there is a total infrastructure funding gap of approximately ~~£304 million~~ **£319.55 million**. However, based on estimated S106 contributions from the eleven strategic sites, allocated in the ALP, this funding gap reduces to £88 million. The IFGU sets out which schemes have been added to the overall infrastructure requirements that will require funding from alternative sources including CIL.

**5.5** Table 5.1 shows a significantly high level of S106 expected to fund infrastructure requirements. This is due to the fact that the infrastructure required for each strategic allocation will largely be delivered by means of S106 agreements. ~~Although, there may be challenges involved in delivering strategic infrastructure for the larger strategic sites in light of the pooling restrictions set out by Regulation 123 of the CIL Regulations, it is anticipated that changes to the pooling restrictions in the future (as proposed in the Supporting housing delivery through developer contributions consultation) will assist with the council's approach. Table 5.1 below summarises the main infrastructure items needed to support the ALP, 2018 and shows the approximate funding gap.~~

**5.6** The CIL Guidance requires that the charging authority should set out at Examination a draft list of the projects or types of infrastructure that are to be funded in whole or in part by the levy as well as those known site specific matters where section 106 contributions will be sought. The ICSDP (see page 20) and IFGU

## 5 Infrastructure Evidence

identifies the projects that are to be funded in whole or part by the levy and this is also set out in the Reg. 123 list which accompanies this consultation document. The site specific tables within the ICSDP provide a list of the infrastructure that will be delivered via S106.

**5.7** The funding gap demonstrates that there is a sufficient funding shortfall that must be filled in order to deliver the infrastructure to support growth in the district (based on the Infrastructure Delivery Plan, 2017). This justifies the preparation of a CIL charging schedule. The council will actively seek additional sources of funding where they may be available in order to reduce the infrastructure gap. It should be noted that the ICSDP is a 'living document', therefore regular updates will be required. This includes the preparation of funding gap updates. In particular, the evidence will need to take account of local infrastructure requirements as the council moves forward with the preparation of the Non-Strategic Sites DPD (the NSS). It is anticipated that most infrastructure needs will be secured on-site via S106 but cumulative/strategic infrastructure projects will require CIL funding.

Category	Total estimated cost (£million)	Existing Funding Available/Secured (£million)	Expected S106 Funding (£million)	Funding Gap (£million)
Primary Education	£77	£2	£75	£0
Secondary Education	£78.3	£0	£47.7	£30.6
Early years/childcare facilities	£14	£0.6	£13.4	£0
Social and Leisure facilities	£31.75	<del>£0.03</del> <b>£0.6</b>	<del>£1.72</del> <b>£1.15</b>	<del>£33</del> <b>£30</b>
Healthcare	£14	£0.5	£13.5	£0
Green Infrastructure and Habitats	£16	£0.6	£3.4	£12
Waste Management	£8.5	£0	£0	£8.5
Emergency Services	£4	£0	£0	£4
Flood Risk Mitigation	£35	£0	£35	£0
Utilities	£3	£0	£3	£0
Transport	£38	£15	£23	£0
Totals	<del>£322.55</del> <b>£319.55</b>	<del>£18.73</del> <b>£19.3</b>	<del>£215.72</del> <b>£215.15</b>	<del>£88.1</del> <b>£85.1</b>

**Table 5.1**

## 6 Viability Evidence

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### 6 Viability Evidence

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

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

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

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

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

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

**6.7** The CILVU, 2018 models a number of development sites (residential and non-residential) and considers variations in land values and development costs across the district. From this the impact of CIL is inferred and variable rates have

been identified. The CIL Guidance is clear that CIL should not be set at the limits of viability. In considering the rates of CIL it has been assumed that the Residual Value should generally be 50% above the Viability Threshold.

**6.8** The consultants conclusions resulting from the evidence identify five geographical zones within the district with significantly different viability characteristics as set out in ~~Table 2~~ **Table 6.1** below. In particular, the study identifies differential values between sites within and outside the urban areas (shown on the Local Plan policies maps as the Built Up Area Boundaries, excluding the strategic allocations) and between the northern and the coastal parts of the district (north and south of the A259). **It must be made clear that the Built Up Area Boundary (BUAB) lines on the ALP Policies Maps have been used as a guide for delineating between the urban and rural zones. In cases where the BUAB is extended, to incorporate Neighbourhood Plan allocations for example, in accordance with paragraph 7.2.8, the charging zone boundary will not be changed.**

**6.9** The consultants have also undertaken a more detailed viability assessment of the strategic housing allocations in the ALP, 2018 and have identified that infrastructure costs associated with these sites, to be delivered through S106 agreements, justify a separate charging zone. <sup>(1)</sup> The study has also found that on sites where the provision of affordable housing is a policy requirement (sites of 11 units or more), viability varies across the district.

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

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

## 6 Viability Evidence

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

**Table 6.1**

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



### 7 The Draft Charging Schedule

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

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

**Table 7.1**

#### NOTES

**7.2** \* These charges apply to the creation of one or more dwellings. The charges also apply to residential extensions or annexes which are 100 square metres or more gross internal area. Where the residential extension or annexe is for the benefit of the owner/occupier, exemptions may apply.

## 7 The Draft Charging Schedule

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

**7.4 [1] The definition of residential development type does not include residential institutions, including purpose built student accommodation.**

**7.5 [2]** Older People's Housing is discussed in the LPVU, 2017. Paragraphs 4.67 - 4.70 of the report provides descriptions of the types of accommodation that this includes: "Sheltered or retirement housing is self-contained housing, normally developed as flats and other relatively small units. Where these schemes are brought forward by the private sector there are normally warden services and occasionally non-care support services (laundry, cleaning etc.). Extracare housing is sometimes referred to as very sheltered housing or housing with care...". This development type does not include residential institutions such as care homes.

**7.6 [3]** Supermarket should be defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix. The majority of custom at supermarkets arrives by car, using the large adjacent car parks provided. (see paragraph 7.11 of CILVU, 2018). Retail warehouse should be defined as large stores specialising in the sale of comparison goods (such as carpets, furniture, and electrical goods) DIY items and other ranges of goods catering mainly for car borne customers. (see paragraph 7.11 of CILVU, 2018).

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

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

### 8 Draft Instalments Policy

**8.1** The importance of allowing CIL to be paid through the life of a project was raised. The analysis in the CIL Update Report (July, 2018) is therefore based on the assumption that CIL is paid through the life of the schemes. The following instalment policy is suggested in the report and presented below for comment: **In accordance with Regulation 69B of the CIL Regulations 2010 (as amended), the council will implement the instalments policy below which will allow persons liable to pay CIL by instalments. This policy will take effect on the same date that the Charging Schedule takes effect in accordance with Regulation 28 of the CIL Regulations 2010.**

Amount of CIL	Number of Instalments	Payment periods and amount
Any amount less than £10,000	One payment	Total amount payable within 60 days of commencement of development
Amount equal to £10,000 or less than £50,000	Three <b>equal</b> instalments	60 days, 120 days and 180 days of commencement of development
Amount equal to £50,000 or less than £100,000	Four <b>equal</b> instalments	60 days, 180 days, 360 days and 540 days commencement of development
Amount higher than £100,000	Five <b>equal</b> instalments	60 days, 180 days, 360 days, 540 days and 720 days commencement of development
<p>Note: Commencement is defined in Regulation 67 of the Community Infrastructure Levy Regulations 2010 (as amended) as relating to the date given on the commencement notice submitted to the charging authority.</p>		

**Table 8.1**

## 9 Exemptions and Relief

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### 9 Exemptions and Relief

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

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

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

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

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

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

### 10 Annual Monitoring

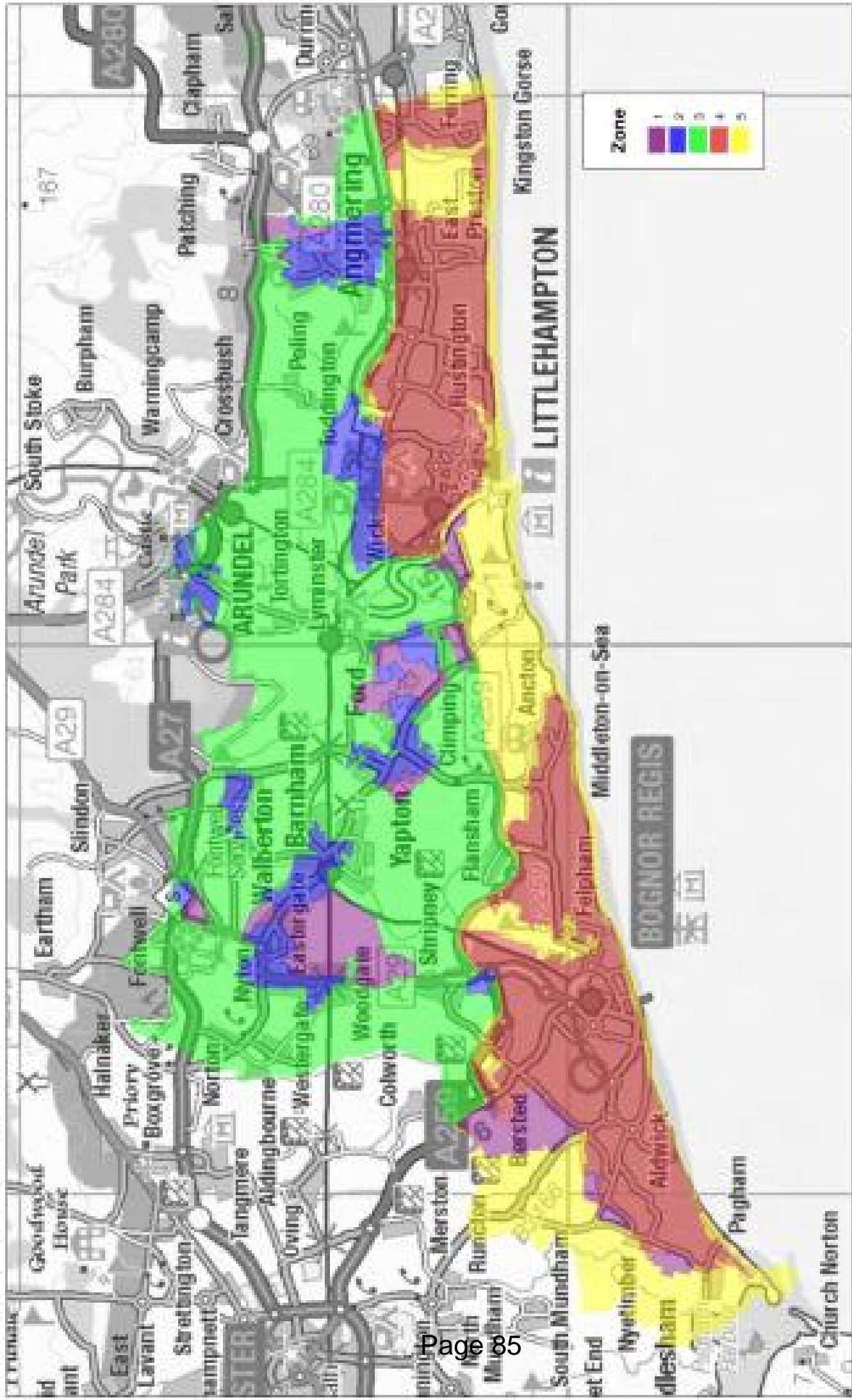
**10.1** The council will monitor CIL income on an annual basis and publish a report in accordance with Regulation 62A of the CIL (Amendment) 2013 Regulations.

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

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

### 11 Appendix 1 - Charging Zones Map

# CIL CHARGING ZONES



SCALE 1:90000 @ A4 LANDSCAPE

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Production Date: 07 September 2018



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## 12 Appendix 2 - Infrastructure List (Regulation 123) and Supporting Text

### Infrastructure List (in accordance with Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended))

**12.1** Once CIL is introduced across the Local Planning Authority area of Arun District Council, the Council intends that the levy receipts received will be used to fund 'district wide' infrastructure projects as well as all necessary infrastructure that was previously funded through the pooling of S106 contributions. This is shown in the first column of the Infrastructure List below.

**12.2** The council will continue to use Section 106 contributions in certain circumstances, in particular to deliver the infrastructure required to support the delivery of the strategic housing allocations identified within the Arun Local Plan 2018. The infrastructure requirements of each of the strategic housing allocations are set out in the site specific allocation policies within the Local Plan; the Infrastructure Capacity Study and Delivery Plan (2017) (ICSDP) as well as within the Funding Gap Update Report (April 2019).

**12.3** Therefore, both CIL and a scaled-back use of planning obligations will operate together in Arun, as is the case in many parts of the country. In summary, the Council proposes to continue the use of planning obligations for the following main purposes:

- The provision of affordable housing (which falls out of the CIL regime);
- Securing the delivery of on-site infrastructure that is required to mitigate the impact of a development (this may be a 'financial' or 'non financial' obligation eg. on-site public open space provision, SuDS, Green Infrastructure connections);
- The provision of infrastructure requirements identified to support the delivery of the Arun Local Plan's strategic housing allocations (as set out in the 'Exclusions' column in the Infrastructure List below);
- Contributions for Access Management at Pagham Harbour

Infrastructure Projects to be Funded at Least in Part by CIL (provision, improvement, replacement, operation or maintenance)	Exclusions (to be secured through planning obligations (S106/S278 agreements))
<b>Transport:</b> <ul style="list-style-type: none"> <li>• Public transport service improvements</li> <li>• Arundel Chord</li> </ul>	<b>Transport:</b> <ul style="list-style-type: none"> <li>• All transport schemes required to be delivered by strategic sites</li> </ul>
<b>Education:</b> <ul style="list-style-type: none"> <li>• A second new secondary school to support the delivery of non-strategic sites.</li> </ul>	<b>Education:</b>



## 12 Appendix 2 - Infrastructure List (Regulation 123) and Supporting Text

<ul style="list-style-type: none"> <li>Additional education facilities required to serve non-strategic development in the district including primary, secondary, sixth form and early years.</li> </ul>	<ul style="list-style-type: none"> <li>10 Form Entry (FE) secondary school plus additional FE to support strategic housing allocations</li> <li>Education requirements to support strategic housing allocations</li> </ul>
<p><b>Healthcare:</b></p> <ul style="list-style-type: none"> <li>Community healthcare/primary care facilities/improvements</li> </ul>	<p><b>Healthcare:</b></p> <ul style="list-style-type: none"> <li>Expansion or new provision of healthcare facilities as required to support strategic housing allocations</li> </ul>
<p><b>Social Infrastructure:</b></p> <ul style="list-style-type: none"> <li>Community facilities other than site-specific requirements</li> <li>Strategic built sport and leisure facilities other than site-specific requirements</li> <li>Cultural venues and public art</li> </ul>	<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>Provision related to strategic sites including hubs on West of Bersted and BEW</li> </ul>
<p><b>Open Space</b></p> <ul style="list-style-type: none"> <li>Public open space other than site specific requirements</li> <li>Playing fields, sports pitches and related built facilities and children's play areas other than site specific requirements</li> <li>Provision of allotments other than site specific requirements</li> </ul>	<p><b>Open Space:</b></p> <ul style="list-style-type: none"> <li>Provision of <b>on-site</b> public open space necessary to make the development acceptable in planning terms</li> </ul>
<p><b>Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>Green Infrastructure (protection and enhancement of the green infrastructure network including four priority projects outlined within the Green Infrastructure Study)</li> <li>Arundel to Littlehampton Corridor Enhancement</li> </ul>	<p><b>Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>Provision of <b>on-site</b> green infrastructure connections</li> </ul>
<p><b>Public Services:</b></p> <ul style="list-style-type: none"> <li>Relocation and redevelopment of Littlehampton Fire Station</li> <li>Ambulance first community response post and community first response facilities</li> <li>Libraries</li> </ul>	<p><b>Public Services:</b></p> <ul style="list-style-type: none"> <li>Provision of Tier 7 libraries at each strategic site</li> </ul>
<p><b>Flood Defence:</b></p> <ul style="list-style-type: none"> <li>Strategic flood alleviation schemes and flood prevention measures</li> <li>Maintain black ditch flood defences</li> </ul>	<p><b>Flood Defence:</b></p> <ul style="list-style-type: none"> <li>SuDS and on-site flood mitigation requirements</li> </ul>

## 12 Appendix 2 - Infrastructure List (Regulation 123) and Supporting Text

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<ul style="list-style-type: none"><li>• Maintain Arundel to Littlehampton flood defences</li><li>• Sustain flood defences at Arundel</li><li>• Adaptive management measures at Pagham Beach</li><li>• SuDS implantation other than site specific requirements</li></ul>	
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**Table 12.1 Regulation 123 list**





## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 18 June 2019

#### PART A : REPORT

**SUBJECT: Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document**

**REPORT AUTHOR:** Kevin Owen, (Team Leader Planning Policy & Conservation)

**DATE:** 4 February 2019

**EXTN:** x 37853

**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

Consultants have been commissioned to help Arun District Council prepare and publish an Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document (OS SPD) with a view to undertaking public consultation in the summer 2019. The OS SPD is needed to support the implementation of Policies HWB SP1 'Health & Wellbeing'; OSR DM1 'Open Space Sport & Recreation'; and OSR SP1 'Allotments' set out within the adopted Arun Local Plan 2011-2031.

The OS SPD will be used to enable developers and Development Management officers to calculate the needs for on-site or off-site forms of provision, according to the demand generated by the scale and type of proposed development, and negotiate the associated land provision, financial contributions and maintenance costs. The OS SPD will also include best practice design for open space, playing pitches and indoor sports provision.

#### RECOMMENDATIONS:

That Planning Policy Sub-Committee:-

1. Agrees the proposed approach and timetable for the public consultation on the draft Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document which following consultation, should be referred to Full Council for adoption;
2. That subject to any further minor changes in consultation with the Chairman, Portfolio holder for Planning and Group Head of Planning, the draft Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document be published for 4 weeks public consultation from 4 July to 1 August 2019.

## **1 BACKGROUND**

- 1.1 At Local Plan Sub Committee on 26 February 2018, and the subsequent Full Council meeting, Members agreed an interim position on the appropriate approach for planning application negotiations between the Council and developers on the provision of open space, playing pitches and built sports facilities. The interim position will prevail until the Council has prepared and adopted the Open Space, Playing Pitch and Built Sports Facilities Supplementary Planning Document (OS SPD). The requirement for an OS SPD is set out in the adopted Arun Local Plan 2018. The draft SPD sets out a methodology for calculating opens pace, playing pitch and built sports facilities contributions (both on and offsite) and once adopted following public consultation, it will be a material consideration in determining applications.
- 1.2 Until such time as a Community Infrastructure Levy (CIL) is adopted, contributions for on and off-site provision will be via planning obligations (financial or direct provision of facilities) secured through the use of legal s.106 agreements with developers, that may be necessary in order to make a development acceptable in planning terms. These s.106 agreements are however, subject to pooling restrictions whereby, no more than 5 pooled contributions can be applied to a single infrastructure project.
- 1.3 Consultants were appointed to prepare the draft OS SPD (Background paper 1). An officer group from across Planning, Development Management and Leisure has helped to ensure that the draft OS SPD meets cross department service and development requirements.

### **Open Space, Playing Pitches and Built Sports Facilities Supplementary Planning Document**

- 1.4 The structure of the draft OS SPD sets out an introduction and policy context to ensure that the OS SPD is grounded in national policy and signals potential changes (e.g. to s.106 pooled contributions and CIL) and the objectives and policy approach of the Adopted Arun Local Plan 2018 including, the supporting evidence base comprising of three key documents. These evidence documents set out identified needs for open space, playing fields, sports pitches and built facilities within Arun:-
- Open Space Study (OSS)
  - Playing Pitch Strategy (PPS) and
  - Indoor Sports and Leisure Facilities Strategy (ISLFS)
- 1.5 Chapter 4 of the OS SPD sets out the methodology to enable developers and Development Management officers to calculate the needs for on or off-site forms of provision, according to the demand generated by the scale and type of proposed development, in order to negotiate the associated land provision, financial contributions and maintenance costs.
- 1.6 There are three separate methodologies – one each for calculating open spaces provision, playing pitches and built sports facilities, summarised as a number of

steps in each case:-

### Open Spaces

- **Step 1: Calculate population generated by housing development** (Number of dwellings x household occupancy rate (2.2) = new population)
- **Step 2: Calculate open space requirement generated by housing development** (Quantity guideline standard for Open Space; Play Space; Allotments x associated population / 1000 = open space requirement);
- **Step 3: Determine if provision should be on site or off-site?** (based on the scale of developments against specified thresholds for on and off-site provision);
- **Step 4: Calculate the financial off site contribution** (cost per Sqm and per dwelling for Open Space, Playing Pitches and Allotments);
- **Step 5: Calculate the contribution for maintenance sums** (cost per Sqm for different thresholds of Open space x 20 years and annualised cost for Play Space x 20 years)

### Playing Pitches

- **Step 1: Determine the playing pitch requirement resulting from the development** (calculated using the Sport England 'Playing Pitch Strategy New Development Calculator' – this is a nationally accessible excel spreadsheet which translates housing/population demand into teams likely to be generated for different sports activities and consequent indicative pitch requirements and associated costs e.g. football, 3G pitch,, rugby, hockey and cricket – note the 'Sport England Facilities Calculator' is used to calculate financial contributions for 3 G pitches);
- **Step 2: Determine whether new provision is required and whether this should be on or off-site** (demand for new pitches should first consider whether existing accessible pitches could be increased in capacity. Similarly, demand which does not equate to full pitch provision on smaller developments can be contributions to enhance existing facilities whether through s.106 - or Community Infrastructure Levy (CIL) should it be adopted by Arun - as appropriate)
- **Step 3a: Determine how best to satisfy demand through new onsite provision** (consult the Arun Playing Pitches Strategy which identifies shortfalls and priorities for where provision can best be located to meet needs)
- **Step 3b: Determine how best to satisfy demand through new off-site provision** (as above consult the Arun Playing Pitches Strategy, other evidence and stakeholders)
- **Step 4: Consider design principles for new provision** (consult national governing bodies for each sport and national guidance provided, consider collocated facilities and sports hubs);
- **Step 5: Calculate the financial contribution required** (as above using the Playing Pitch Strategy New Development Calculator for associated costs for grass pitches including lifecycle/replacement costs and the Sports Facilities Calculator (another excel spreadsheet used to calculate costs and contributions – see section 4 below) for 3G pitches).

## Indoor & Built sports Facilities

- **Step 1: Determine the key indoor and built sports facility requirement resulting from the development** (using the Sport England Facilities Calculator which calculates the demand for sports facilities such as sports halls and swimming pools and 3G pitches generated by new development based on Sport England data allied to local population /housing growth for the area and provides indicative capital cost outputs for facilities and buildings based on national indices i.e. Building Cost Information Service/BCIS data);
- **Step 2: Determine the other indoor sports and community facilities required as a result of the development** (for indoor sports facilities not include within the Sport Facilities Calculator e.g. Health and fitness suites to be calculated via the Arun Indoor Sport and Built Facilities Strategy identification of shortfalls and priority alongside the excel health and fitness calculator in table 4.3.1 (Page 22 of OS DPD) which calculates a penetration rate for Health & Fitness arising from new population, average number of users for equipment and the accommodation space required and estimated financial contribution based on cost per Sqm);
- **Step 3: Demonstrate an understanding of what else the development generates demand for** (e.g. consider the need for associated infrastructure such as health centres and whether co-location and shared facilities including opportunity for hubs or provision as part of a new leisure centre provide more operational cohesion, through consulting Masterplans for Strategic Allocations and the Infrastructure Capacity Study Delivery Plan infrastructure requirements supporting the adopted Arun Local Plan 2018);
- **Step 4: Financial contributions to deliver strategic provision** (calculated using the Sport Facilities Calculator which based on cumulative impact of the Strategic Allocations sets out need for new sports halls and swimming pool lanes, requiring a new Leisure Centre to serve the east of the District. This demand is phased but is likely to be needed earlier when taking into account population demand from non-strategic sites which are not yet included in the Sport Facilities Calculator calculation for the leisure centre because their location is not yet known – an explanation is provided in Appendix 3 (of the OS DPD) which sets out an approach to cumulative demand for built sports facilities).

### 1.7 The OS SPD methodologies above are supported with guidance:-

- Appendix 1 sets out an approach to off-site contributions and maintenance costs for opens spaces and play space;
- Appendix 2 provides design principles for new provision;
- Appendix 3 guidance on cumulative demand for built sports facilities;
- Appendix 4 sets out guidance on Sustainable Drainage Systems and Green Infrastructure;
- Appendix 5 sets out minimum site sizes; and
- Appendix 6 offers worked examples (including a smaller scale development of 12 dwellings, a development of 90 dwellings and a larger scale development of 1,500 dwellings).



## 2 OPEN SPACES AND PLAY SPACE

2.1 In recognition of the changes to national best practice (i.e. the replacing of the National Playing Fields Association Six Acre Standard) and the establishment of the Fields In Trust (FIT) quantity guidelines (Ha per 1,000 population) the OS SPD adopts these standards for open space and playing pitches in Arun and these are grouped according the typologies in OS SPD Table 4.1.1 set out below:-

*Table 4.1.1: Quantity guideline standards*

Typology		Quantity Guideline	
		(Hectares per 1,000 population)	(Square Metres per 1,000 population)
Public Open Space	Parks and Gardens	0.80	8,000
	Amenity Greenspace	0.60	6,000
	Natural and Semi-Natural	1.80	18,000
<b>POS total</b>		<b>3.20</b>	<b>32,000</b>
Play Space	Equipped / designated play areas	0.25	2,500
	Other outdoor provision (MUGAs and skateboard parks)	0.30	3,000
<b>Play total</b>		<b>0.55</b>	<b>5,500</b>
Allotments	Allotments	0.25	2,500
<b>Allotment total</b>		<b>0.25</b>	<b>2,500</b>
<b>TOTAL</b>		<b>4.00</b>	<b>40,000</b>

2.2 With the exception of small developments of 1-9 dwellings, all residential developments are required to make a contribution towards these standards to varying amounts based on the number of new dwellings on-site. The thresholds for determining on or off-site provision are based on table 4.1.2 below:-

*Table 4.1.2: Type of contribution based on scale of development*

Public Open Space	1-9 dwellings	10-14 dwellings	15 dwellings or greater
	No contribution	Offsite financial contribution (S106 or from CIL receipts (once adopted))	On site

Allotments	1-9 dwellings	10-727 dwellings	728 dwellings or greater
	No contribution	Offsite financial contribution (S106 or from CIL receipts (once adopted)) for development of 10-727 dwellings	On site provision of land in developments of 728 or more

<b>Play space</b>	<i>LAP</i>	<b>1-9 dwellings</b>	<b>10-14 dwellings</b>	<b>15 dwellings or greater</b>
		No contribution	On site provision of land	
	<i>LEAP</i>	<b>1-9 dwellings</b>	<b>10-33 dwellings</b>	<b>33 dwellings or greater</b>
		No contribution	Offsite financial contribution (£106 or from CIL receipts (once adopted)) for development of 10-33 dwellings	On site provision of land and equipment in developments of 33 or more
	<i>NEAP<sup>1</sup></i>	<b>1-9 dwellings</b>	<b>10-83 dwellings</b>	<b>83 dwellings or greater</b>
		No contribution	Offsite financial contribution (£106 or from CIL receipts (once adopted)) for development of 10-83 dwellings	On site provision of land and equipment in developments of 83 or more

*LAP= Local Areas for Play; LEAP= Local Equipped Area for Play; NEAP = Neighbourhood Equipped Area of Play.*

2.3 Off-site provision will be calculated according to the following amounts (the methodology takes account of national and local information benchmarked against other local authority costs):-

*Table 4.1.3: Financial contribution per dwelling rate*

	<b>Public Space</b>	<b>Open</b>	<b>Play</b>	<b>Allotment</b>
<b>Cost per Square Metre</b>	£28		£143	£3.50
<b>Contribution per dwelling</b>	£1,971.20		£1,730.30	£19.25

2.4 Non-strategic sites and windfall developments projects will pay CIL levy funds for other off-site projects identified via the Open Space Study, Playing Pitch, Indoor Sports and Leisure Facilities Strategies. These CIL projects will be set out in a Regulation 123 list. This Regulation 123 list may need to be supplemented by other infrastructure evidence as the Non-Strategic Sites DPD is prepared.

2.5 However, the CIL Regulation 123 list may also fund off-site projects set out in the Arun Local Plan and supporting Infrastructure Capacity Delivery Plan which sets out infrastructure costs by type of provision and strategic development.

2.6 Maintenance costs would be based on the following costs per square metre:-

*Table 4.1.4: Maintenance costs*

<b>Provision type</b>	<b>Cost of maintenance for a 20-year period (per Square Metre)</b>

<sup>1</sup> Includes MUGAs (Multi-Use Games Area) skate parks and/or other provision catering for older age ranges

POS	Less than 0.1 ha	£23.51
	0.1 to 1 ha	£16.88
	Greater than 1 hectare	£11.23

Provision type	Annual cost
Play space	£1,500

2.7 Maintenance costs are calculated for a 20 year period and on a cost per Sqm while play space cost is annualised. It should be noted that build costs and facilities costs calculated through Sport England's' PPS New Development Calculator and Sport Facilities Calculator are based on national data sets and Building Cost Information Service/BCIS data which is updated each year. The Excel sheet calculator is shown in Background paper 2: Open Space & Play calculator v5.

2.8 Local Plan Policy HWB SP1 'Health & Wellbeing' supporting text (para 14.1.7) suggests that commercial uses (e.g. B1, B2 and B8 and retail class) may be expected to contribute appropriate forms of provision. However, in reality the demand generated from such development is not likely to be significant or viable and it is not therefore, included within this SPD.

### 3 PLAYING PITCHES (SPORT)

3.1 All developments of 10 or more dwellings are expected to make provision towards sports playing pitches. The calculation is based on the Arun Playing Pitches Strategy (PPS) which sets out a 'Playing Pitches New Development Calculator' (supported by Sport England).

3.2 The Playing Pitches Strategy New Development Calculator converts housing increases into population and then into equivalent number of teams generated (demand for match equivalent sessions for football, rugby, hockey and cricket ) in order to calculate the number of pitches required, including costs of increased pitch provision, including the lifecycle of the facility (e.g. maintenance, replacement).

3.3 The Arun Playing Pitches Strategy will guide where provision should be made including where off site contributions would best be applied to deliver identified needs and priorities. Ancillary facilities such as changing rooms, parking, cycling provision will also need to be secured for new pitch provision.

### 4 BUILT SPORT FACILITIES

4.1 The need for indoor sports facilities generated by new developments will be calculated using Sport England's Facilities Calculator which will need to be accessed by stakeholders registering on the Active Places Power web site in order to use the calculator.

4.2 The Sport Facilities Calculator works in a similar way to the New Development Calculator by converting new dwelling provision into population which is converted

into local demand for sports halls, swimming pools, and artificial grass pitches. The Sport Facilities Calculator translates this into demand for units of equivalent badminton courts, swimming pool lanes etc. based on national participation rates and usage and includes cost calculations.

4.3 Provision and distribution of calculated need from developments using the Sport Facilities Calculator will be guided by the identified needs and priorities set out in the Arun ISLFS. An important consideration for developers will be the need to factor in the cost of necessary land provision to accommodate any new facilities. An indicative approach is set out in Appendix 3 although because of the variability of land costs and over time, land costs will need to be determined on a case by case basis.

4.4 Health and fitness facilities are not included in the Sport Facilities Calculator as it is not calculated nationally. The OS SPD therefore, sets out a calculation for considering such provision and will also need to consider synergies with other existing forms of provision, existing capacity and whether community hubs and collocated mixed use facilities may provide opportunities:-

*Table 4.3.1: Calculating Health and Fitness contribution*

2a	<b>Estimated new population to use H&amp;F</b> = New population generated x National penetration rate for H&F of 14% (New population generated x 0.14)
2b	<b>Pieces of equipment required</b> = Estimated new population to use H&F (2a) / National average number of users (25) per equipment piece
2c	<b>Space required to accommodate equipment</b> = Pieces of equipment required (2b) x Average square metres (5) per equipment piece
2d	<b>Financial contribution required</b> = Space required to accommodate equipment (2c) x Estimated build and equipment cost per square metre (£2,000)

4.5 Onsite provision and off-site provision for Strategic allocations will be via s.106 contributions subject to pooling restrictions. Provision will be in accordance with identified projects and requirements set out in the policies of the adopted Arun Local Plan 2018 and supporting Infrastructure Capacity Delivery Plan, the Arun Open Space Strategy, Arun Playing Pitch Strategy and Arun Indoor Sports & Leisure Facilities Strategy.

4.6 Non-strategic and windfall on and off-site contributions will be via S.106 (subject to pooling restrictions) until CIL is adopted when s.106 will be scaled back to on-site provision. The Arun Open Space Strategy, Arun Playing Pitch Strategy and Arun Indoor Sports & Leisure Facilities Strategy evidence base will be used and supplemented by infrastructure evidence prepared supporting the Non-Strategic Sites Development Plan Document, to establish projects for funding via CIL revenue as part of the Regulation 123 list of CIL infrastructure projects. These will be bid against to fund each project. The CIL regulations are under review by Government and it is anticipated that the s.106 pooling restrictions and need for a

CIL Regulation 123 list may be superseded by a more flexible system.

**NEXT STEPS AND TIMETABLE**

4.7 Officers will publish the draft OS DPD for public consultation for 4 weeks between 4 July to 1 August 2019.

4.8 Following the public consultation and subject to amendments the OS SPD will be submitted to Full Council 13 November for adoption.

**2. PROPOSAL(S):**

That the report is noted and agreement is provided to conduct a 6 week public consultation 4 July – 1 August 2019.

**3. OPTIONS:**

Not to progress the OS SPD would risk allowing development to be permitted which is not meeting its own generated needs, leading to unsustainable development within Arun.

**4. CONSULTATION:**

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

5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	x	
Legal	x	
Human Rights/Equality Impact Assessment	x	
Community Safety including Section 17 of Crime & Disorder Act		x
Sustainability	x	
Asset Management/Property/Land	x	
Technology		x
Other (please explain)		x

**6. IMPLICATIONS:**

SPD which is subject to public consultation will have added weight as a material consideration in the determining of planning applications and help to secure more sustainable development benefitting local communities and place making through necessary provision of on and off-site infrastructure including via financial contributions towards new or enhanced infrastructure.

**7. REASON FOR THE DECISION:**

To ensure that Arun can continue to secure that development that is plan led and consistent with sustainable development.

**8. EFFECTIVE DATE OF THE DECISION: *Committee Services to insert***

**9. BACKGROUND PAPERS:**

Background paper 1: 'Draft Supplementary Planning Document – Open Spaces, Playing Pitches, Indoor and Built Sports Facilities – Arun District Council May 2019'

Background paper 2: Open Space & Play calculator v5.

## OPEN SPACE AND PLAY CALCULATOR

Number of dwellings			
Population	0		
<b>Onsite contribution requirements (SqM)</b>	<i>Public Open Space</i>	<i>Play Space</i>	<i>Allotments</i>
	0	0	0
<b>Offsite contribution requirements (£)</b>	<i>Public Open Space</i>	<i>Play Space</i>	<i>Allotments</i>
	0	0	0

Commuted POS Maintenance Sum (for 20 year period)	0
Play Maintenance Sum (per play site)	0

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## **DRAFT SUPPLEMENTARY PLANNING DOCUMENT**

### **OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES**

#### **ARUN DISTRICT COUNCIL**

**MAY 2019**

QUALITY, INTEGRITY, PROFESSIONALISM

**Knight, Kavanagh & Page Ltd**

Company No: 9145032 (England)

**MANAGEMENT CONSULTANTS**

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# ARUN SUPPLEMENTARY PLANNING DOCUMENT

## OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

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### 1. INTRODUCTION

This Open Space Supplementary Planning Document (OS SPD) sets out Arun District Council's requirements for the provision of open space, playing pitches, indoor and built sports facilities within new developments.

This OS SPD supersedes the previous Arun Supplementary Planning Guidance (2000) which used a standards-based approach for the provision of open space and recreation (including outdoor sport).

The OS SPD adopts best practice, applying the Fields In Trust guidelines for different types of open space and play space provision and site capacity calculators based Sport England guidance (see section 3.2).

This OS SPD therefore, provides a methodology to enable developers and Development Management officers to calculate the needs for on-site or off-site forms of provision, according to the demand generated by the scale and type of proposed development, and to negotiate the associated land provision, financial contributions and maintenance costs. The OS SPD will also include best practice design for open space, playing pitches and indoor sports provision). It should be noted that the OS SPD requires land costs to be factored into off site provision of open space, play space, pitches and built facilities.

Until such time as CIL is adopted by Arun District Council, contributions for on and off-site provision will be via s.106 (subject to pooling restrictions). When CIL is adopted Strategic Allocations will be zero rated for CIL levy and contributions continue to be secured via s.106 whereas, non-strategic sites (circa 300 dwellings or less) will levy a CIL charge and s.106 will be scaled back to on-site requirements.

To ensure that developers do not pay twice (though both s.106 and CIL levy) for the same item of infrastructure, Strategic Allocations will continue to use s.106 to fund off-site infrastructure identified in the adopted Arun Local Plan 2018 policies and supporting Infrastructure Capacity Development Plan 2017 (ICDP) and strategic priorities in the supporting Open Space, Playing Pitch and Indoor Sport and Leisure Facilities strategies evidence base. There will also be a need to establish a Regulation 123 list of infrastructure projects to be funded by the CIL levy to ensure that the impact of non-strategic sites and windfall development is mitigated. Although it is acknowledged with CIL that not all needed strategic infrastructure will necessarily be delivered or delivered when required because it is subject to a bidding process

Furthermore, the CIL Regulation 123 list may also fund off-site projects set out in the Arun Local Plan 2018 and ICDP for Strategic Allocations because s.106 contributions from Strategic Allocations will not cover all of the identified infrastructure cost, and non-strategic sites and windfall sites may add to the mitigation required. There will be no risk of double counting as Strategic Allocations will be zero rated and not pay a CIL charge and s.106 is scaled back to on-site contributions for non- strategic sites.

The provision of high-quality open space, playing pitches, indoor and built sports facilities is a vital element of where people live, work and visit. New development creates additional demand for such facilities. It is therefore essential that new areas of population provide and make adequate and appropriate contributions towards open space, playing pitches, indoor and built sports facilities.

In some instances, the most effective means of meeting the additional demand from a new development will be through providing onsite provision within a development. Equally, in

## **ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES**

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some instances the most effective means will be through the provision of new or enhancement of existing facilities within a reasonable distance.

In terms of open space, playing pitches, indoor and built sports facilities, this SPD is referring to the types of provision predominantly cited in the Council's suite of studies; Open Space Study, Playing Pitch Strategy and Indoor Sport and Built Facilities Strategy. These studies should also be used to help offer further advice and inform the priorities and requirements for new developments.

It is important that negotiations begin at the earliest stage of design. Open space, playing pitches, indoor and built sports facilities should be designed as an integral part of a development. They should not be the areas of land which are most difficult to build on. This is to ensure the delivery of usable forms of open space, playing pitches, indoor and built sports facilities provision. Further clarity to what is meant by usable forms of provision is set out in Appendix 2.

## **2. POLICY CONTEXT**

### **National Planning Policy Framework**

Paragraph 54 of the National Planning Policy Framework (NPPF) (2018) identifies that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.

In Paragraph 56 of the NPPF it states planning obligations must only be sought where they meet all of the following tests:

- ◀ Necessary to make the development acceptable in planning terms
- ◀ Directly related to the development, and
- ◀ Fairly and reasonably related in scale and kind to the development

Paragraph 57 NPPF continues to say that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker. All viability assessment should reflect the recommended approach in national planning guidance.

Guidance on planning obligations, their use and process are set out by the Government<sup>1</sup>.

Paragraph 96 of the NPPF states access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well being of communities. Planning policies should be based on robust and up-to-date assessments for open space, sport and recreation. Information gained from these assessments should be used to determine what provision is needed.

### **Reforms to developer contributions**

The Government announced and is consulting on a number of reforms to the system of developer contributions and the Community Infrastructure Levy Regulations 2010 as part of its Autumn Budget (2017). These reforms aim to:-

- ◀ ensure that viability assessment is part of the plan making system as set out in the NPPF 2019;
- ◀ make the system of developer contributions more transparent and accountable;
- ◀ ensure the draft regulations deliver the intended policy changes and do not give rise to unforeseen consequences;
- ◀ remove the restriction on more than five section 106 obligations to fund a single infrastructure project ('the pooling restriction') which originally intended to incentive uptake of CIL but has caused complexity and delay;
- ◀ remove the duty on CIL charging Local Authorities to prepare Regulation 123 list for CIL projects and replace with an annual 'Infrastructure Funding Statement' setting out how both s.106 and CIL money has been spent on infrastructure in order to improve flexibility.

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<sup>1</sup> <https://www.gov.uk/guidance/planning-obligations>

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

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The current mechanism for developer contributions towards open space, playing pitches, indoor and built sports facilities is via section 106 (and based on Open Space and Recreation Standards SPG, October 2000).

However, Arun District Council aims to have an adopted CIL charging schedule by early 2020 although until such time as CIL is adopted, contributions for on and off-site provision will continue to be via s.106 (subject to pooling restrictions).

When CIL is adopted, Strategic Allocations will be zero rated for a CIL levy and on and off-site contributions will therefore, continue to be secured via s.106 whereas, non-strategic sites (circa 300 dwellings or less) will levy a CIL charge and s.106 will be scaled back to on-site requirements.

For those Strategic Allocations where a sports 'hub' site is proposed, onsite contributions via section 106 is required e.g. for sports halls and health & fitness. However, offsite financial contributions may also be sought via section 106 required for swimming pool provision.

For playing pitches, contributions will also be via section 106 for Strategic Allocations but via CIL (once adopted) for non-strategic sites (where off site provision is required).

### **Arun Local Plan 2011-2031 (Adopted July 2018)**

The commitment to prepare an Open Space, Playing Pitches and Built Sport Facilities Supplementary Planning Documents is set out within the adopted Arun Local Plan 2018. Paragraph 14.1.12 states that an SPD will be prepared that sets out the methodology for providing open space, playing pitches, indoor and built sports facilities.

Chapter 14: Health, Recreation and Leisure of the Arun Local Plan 2018 sets out the Council's approach, priorities and policies relating to open space, sport and recreation provision.

In particular, Policy OSR DM1 'Open space, sport & recreation' requires that new developments contribute appropriate forms of provision and or enhancement as identified via the Open Spaces, Playing Pitches and Indoor Sport & Leisure Facilities Strategies. These evidence studies identify the need for hub provision in certain locations and the need for a new leisure Centre in the West of the District

Policy HWB SP1 states: "All development should be designed to maximise the impact it can make to promoting healthy communities and reducing health inequalities. In particular regard shall be had to:-

- a. *providing or contributing to the necessary infrastructure to encourage physical exercise and health, including accessible open space, sports and recreation facilities (including outdoor fitness equipment) and safe, well promoted, walking and cycling routes.*
- b. *Creating mixed use development and multi-use community buildings that reduce the need to travel by providing housing, services and employment in close proximity to each other; and*
- c. *Ensuring that arts and cultural facilities are accessible to all residents and visitors to the District".*

It is therefore a requirement, set out within the Arun Local Plan (2018), for new housing development to contribute to new provision within the District in order to mitigate the impact of development.

#### Strategic Priorities

A number of strategic priorities for leisure and recreation facilities have been developed and are set out under Policy HWB SP1 'Health & Wellbeing' of the adopted Arun Local Plan (2018). These are based on the identified needs and opportunities for health, recreation and leisure facilities from relevant strategies and studies. These are:

- ◀ Community sports hubs
- ◀ Open access fitness equipment in parks and open spaces in the District
- ◀ New high quality public open space for all new Strategic Housing developments, and all other new housing to contribute towards open space provision in accordance with the Open Space Study
- ◀ A new high quality linear park as an integral part of the housing allocation at Barnham/Eastergate/Westergate
- ◀ Additional sports pitches and improvements to existing facilities to increase capacity
- ◀ New provision for teenagers and young people
- ◀ Ensure low quality, highly-valued open space sites are prioritised for enhancement
- ◀ Ensure all open space sites assessed as high for quality and value are protected
- ◀ Open space sites helping to serve areas identified as having gaps in provision should be recognised through protection and enhancement
- ◀ Recognised areas with surpluses in open space provision and how they may be able to meet other areas of need
- ◀ The need for additional cemetery provision should be led by demand
- ◀ To protect the existing supply of outdoor sports facilities where it is needed for meeting current and future needs
- ◀ To enhance outdoor sports facilities through improving quality and management
- ◀ Provide new outdoor sports facilities where there is current or future demand to do so
- ◀ Forward plan for future facility requirements based on projected population growth and demand
- ◀ Consider the impact of the new leisure centre in Littlehampton given the proposed future housing developments/population growth
- ◀ Encourage schools, whether building new, or when improvements to sports facilities in existing schools are made, to have community use agreements in place
- ◀ Aim to ensure that all Arun residents have access to community sports facilities which are accessible from a cost, distance and appropriate/fit for purpose point of view
- ◀ To deliver a new leisure centre in the west of the District to meet the needs of current and future residents
- ◀ Need for additional water space to meet current and future demand dependent on growth in housing
- ◀ Need for additional sports hall space to meet current and future demand dependent on growth in housing
- ◀ Need for additional health and fitness provision to meet current and future shortfall
- ◀ A new leisure centre to accommodate need for additional water space, sports hall and health and fitness provision in the District
- ◀ Need for additional 3G pitches in the District to meet current and future demand
- ◀ Short term investment in existing leisure facilities to meet increase in demand and increase capacity at sites
- ◀ Need for additional gymnastics facilities to meet latent demand



## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

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The Arun Local Plan Policy 2018 suggests that commercial uses (e.g. B1, B2 and B8 and retail class) may be expected to contribute appropriate forms of open space provision (Policy HWB SP1 'Health and Wellbeing' and para 14.1.7). However, in reality the demand generated from such development is not likely to be significant or viable and it is not therefore, included within this SPD.

In light of the above section, the Council requires (Paragraph 14.1.8) that:-

- ◀ New housing development, of 10 dwellings or greater, makes provision for and/or contributes to recreation and leisure facilities

Paragraph 14.1.9 sets out that the Council will seek facilities or financial contributions for recreation and leisure facilities as follows:

- ◀ For open space, outdoor sport and recreation facilities, land set out in the right quantity (overall area), quality, specification and, if not on site, within an appropriate distance of the proposed development.
- ◀ For indoor sports facilities, the Sport England Sports Facilities Calculator (using local cost weightings for Arun District and West Sussex). The most up-to-date version of the Sports Facilities Calculator will be used.

Where the necessary space is not provided by the developer and there are no alternative schemes within an appropriate distance from the site to which the developer can contribute towards, planning permission shall not be granted (Paragraph 14.1.10).

There may be occasions when it is not appropriate to provide facilities on site. In these cases the Council will collect financial contributions from developers and allocate those contributions to specific projects which deliver the Strategic Priorities identified in this chapter and within Arun District Council strategies and studies which inform the Policy. The strategic nature of the projects means that they will benefit residents across Arun District, not just the occupants of the development which has made the financial contribution (Paragraph 14.1.11).

### **3. THE EVIDENCE BASE**

#### **3.1 Supporting evidence**

The NPPF states planning policies for open space, sports and recreation facilities should be based upon robust and up-to-date assessment of the needs for such provision. Consequently, ADC has produced several strategies and studies to inform policy development and priorities which are referred to by the adopted Local Plan policies as outlined above. These include:

##### **Open Space Study**

- ◀ provides an assessment of the quantity, quality and accessibility of existing open space provision;
- ◀ identifies and recommends where sites could be enhanced and/or protected;
- ◀ provides a set of locally derived standards for quantity and accessibility.

##### **Playing Pitch Strategy (PPS)**

- ◀ compliant with the Sport England Guidance covering main pitch and outdoor pitch sports;
- ◀ provides a detailed assessment to the quantity, quality and the current and future capacity of all provision in the area including 3G pitches
- ◀ recommends site-specific actions for these sports in order to address identified deficiencies and to help improve participation;
- ◀ provides a key point of reference for the delivery of sports facilities through new housing developments and appropriate contributions to deliver recommendations and actions

##### **Indoor Sport and Built Facilities Strategy**

- ◀ compliant with the Sport England Guidance on indoor and built facilities
- ◀ evaluates the supply and demand of flexible sports/activity hall space, swimming pools, health & fitness and other sports provision in the District;
- ◀ provides recommendations in order to give clear direction to all local partners to plan and develop a modern, efficient and sustainable range of community based sports and leisure facilities

Both the PPS and Indoor Sport and Built Facilities Strategy include the concept of community sports hubs. Hub sites are defined in the Arun PPS as being of strategic District-wide importance where users are willing to travel to access facilities that provide a quality offer and range of provision. Hub sites are multi-sport facilities and will address a range of strategic issues that are identified in the Strategy documents.

There are three community sports hub sites recognised by ADC as a priority for progressing:

- ◀ Palmer Road Recreation Ground in Angmering
- ◀ Barnham, Eastergate and Westergate (as part of strategic development site)
- ◀ West of Bersted (as part of strategic development site)

Only one of these (Palmer Road Recreation Ground) is an existing site. The other two are identified as potential new sites within strategic developments. Given the strategic role and priority of these hub sites, contributions from different developments will be sought to assist in the creation of them.

# ARUN SUPPLEMENTARY PLANNING DOCUMENT

## OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

### 3.2 Need for updated SPD

The previous Arun Supplementary Planning Guidance (2000) used a standards-based approach for the provision of open space and recreation (including outdoor sport). It was broadly based on the National Playing Field Associations (NPFA) Six Acre Standard of 2.4 hectares per 1,000 population (equivalent to 24 square metre per person).

The NPFA has since become Fields In Trust (FIT). The Six Acre Standard of 2.4 hectares per 1,000 population has also been superseded by an updated set of quantity guidelines<sup>2</sup> for different types of open space (Table 3.1).

The latest best practice guidance from Sport England advocates a site by site capacity analysis as opposed to a standards-based approach for playing pitches, outdoor or indoor sports provision.

Consequently, the FIT guidelines are only used in determining the requirements for open space and play provision. Sport England guidance offers specific advice and recommendations on how best to assess the needs for playing pitches, outdoor sports, indoor and built sport facilities. For pitch provision this is *An Approach to Developing and Delivering a Playing Pitch Strategy (PPS)*. For outdoor sports, indoor and built facilities it is *Assessing Needs and Opportunities Guide (ANOG)*. Both guides do not endorse a standards-based approach to assessing the needs of such forms of provision.

Table 3.1: Fields in Trust Recommended guidelines - quantity

Open space typology	Quantity Guideline (hectares per 1,000 population)
Parks and Gardens	0.80
Amenity Greenspace	0.60
Natural and Semi-Natural	1.80
Equipped / designated play areas	0.25
Other outdoor provision (MUGAs and skateboard parks)	0.30
<b>Combined total</b>	<b>3.75</b>

The previous SPG did not require a contribution to the provision of allotments. However, they are now widely recognised for their recreation and social value. The National Society of Allotment and Leisure Gardeners (NSALG) suggests a standard of 0.25 hectares per 1,000 population. This is to be used to determine the requirements for allotments.

### 3.3 Approach

The delivery of new provision will be via on site and/or financial contributions towards these types of provision. In situations where no on site provision is justified, a financial contribution towards enhancing the quality and accessibility (and subsequently the capacity) of existing forms of provision will be sought. The contribution will be used to improve and enhance existing provision and its future maintenance. This is justified to address the increasing pressure on existing provision generated by new developments.

The approach to how provision of high-quality open space, playing pitches, indoor and built sports facilities are to be calculated in new developments is different to reflect the variances

<sup>2</sup> Fields in Trust: Guidance for Outdoor Sport and Play (2015)

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

in national guidance and best practice guidance. An overview to each of the approaches is set out in Table 3.2:

*Table 3.2: Overview approach to provision types*

Provision type	Summary
Open space	The latest FIT guideline standards are used to inform the requirements for open space provision. This is for consistency with the previous SPG and to be in line with neighbouring local authorities. For allotments, the standard of 0.25 hectares per 1,000 population as recommended by the National Society of Allotment and Leisure Gardeners (NSALG) is used. Furthermore, the evidence base of the open space study demonstrates that current provision levels are well below the guideline levels provided by FIT and NSALG.
Playing pitches	Sport England's Playing Pitch New Development Calculator is used to determine the additional demand created from new developments. This uses the Team Generation Rates (TGRs) established as part of the latest Playing Pitch Strategy to calculate the estimated demand by sport.
Indoor and built sports facilities	Sport England's Facilities Calculator is predominantly utilised to quantify how much additional demand for key community sports facilities will be generated by populations of new growth and development.

Sport England has identified that its highest priority for investment will be tackling inactivity. In addition to this it will continue to invest in facilities, but that there will be a focus on multi-sport and community hubs which bring together other services such as libraries and doctor's surgeries.

It should also be recognised that the FA and its partners have created a Local Football Facility Plan (LFFP) for Arun. This national program identifies priority projects for potential investment in every local authority area. It does not guarantee the success of future funding applications but acts as a portfolio for projects that require funding.

### ***Other considerations***

Developments should also consider the role of high-quality open space, playing pitches; indoor and built sports facilities in helping to deliver Sustainable Urban Drainage Systems (SUDS) and Green Infrastructure (GI).

#### *Sustainable Urban Drainage Systems*

The primary purpose of SUDS is to minimise the impact of urban development on the water environment, reduce flood risk and provide habitats for wildlife. SUDS should increase the levels of water capture and storage.

Policy W DM3 of the Arun Local Plan requires major development to integrate SUDS into the overall design of a development.

It is essential that SUDS do not impact on the usable levels of public open space also required as part of new housing developments. SUDS whilst providing benefit in the correct capacity within development, should not be included in the 'usable open space calculations'

#### *Green Infrastructure*

Well-connected Green Infrastructure assets perform a range of important functions relating to the natural environment, climate change mitigation and adaption and quality of life.

## **ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES**

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Policy GI SP1 (Chapter 7 of the Local Plan) cites all major developments must be designed to protect and enhance existing Green Infrastructure assets, and the connections between them, in order to ensure a joined up Green Infrastructure Network.

The policy goes on to require that where compatible with nature conservation objectives, development proposals must identify opportunities to connect existing Green Infrastructure assets with the coast, the South Downs National Park or to the District's inland villages.

The policy continues that opportunities to enhance the network should take account of the multiple functions of Green Infrastructure assets and should be based upon those opportunities set out Policy GI SP1 'Green Infrastructure and Development'.

Further information and guidance to the provision of SUDS and GI are set out in Appendix 4.

#### **4. DETERMINING CONTRIBUTION REQUIREMENTS**

This section sets out how provision of high-quality open space, playing pitches, indoor and built sports facilities are to be calculated in new developments.

For each provision type an explanation to the approach including trigger points for onsite and offsite provision, financial contributions and maintenance sums is provided.

The basic principle is that a development should provide for the recreational needs that they generate. All new developments should therefore contribute. Consequently, the Council expects adequate provision of open space, playing pitches, indoor and built sports facilities to be provided.

In summary, the following types of development will not need to meet the requirements: replacement dwellings, extensions/annexes, rest homes, nursing homes, other institutional uses and temporary permissions for mobile homes. However, in some cases these types of developments should still incorporate green infrastructure elements within the scheme.

Arun District Council aims to have an adopted CIL charging schedule by early 2020. Once the local authority has adopted a CIL Charging Schedule, CIL monies will be received from non-strategic development sites, which will replace the section 106 contributions for off-site infrastructure provision.

The current mechanism for developer contributions to open space, playing pitches, indoor and built sports facilities is via section 106. Once the CIL is adopted non-strategic sites and windfall sites will be subject to section 106 for onsite provision of open space and play with the CIL being used for offsite financial contributions. Strategic developments are expected to predominantly provide provision requirements as onsite forms of land. The landtake contribution should specifically be taken into consideration when reviewing the contributions sections for public open space, playing pitch provision, indoor and built sports facilities set out below.

To assist in the design of provision, Appendix 2 outlines the key design principles for developers to consider.

A step by step approach is presented for each of the three forms of provision (i.e. open space, playing pitches, indoor and built sports facilities).

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## OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

### 4.1 Open spaces

An open space calculator is available to assist in calculating the requirements for open space and play space for developments. This also helps in determining whether the contribution towards provision is required on or offsite. The calculator should be used to help inform Steps 1, 2, 3 and 4 of the open space requirements process.

Once CIL is adopted, off site provision for non-strategic sites will be made by CIL receipts.

<b>Step 1</b>	<b>Calculate population generated by housing development</b>
---------------	--

To determine the requirements for open space provision, the starting point is to calculate the level of demand (additional population) generated by that development.

$$\text{Number of dwellings} \times \text{household occupancy rate (2.2)}^3 = \text{new population}$$

For developments containing apartments, the same occupancy rate of 2.2 should be applied.

<b>Step 2</b>	<b>Calculate open space requirement generated by housing development</b>
---------------	--

To then determine the open space requirement for each form of open space the associated population is multiplied by the quantity guideline (standard) for each relevant typology. The following calculation should be used:

$$\text{Quantity guideline standard} \times \text{associated population} / 1000 = \text{open space requirement}$$

This will give the requirements (in hectares) resulting from the development. This should be converted to square metres. As stipulated earlier, the FIT guideline standards and the NSALG standard for allotments are used to calculate the amounts of provision required.

For the purposes of this SPD the typologies have been grouped to reflect the differences in the role and use of these forms of provision. These are:

Table 4.1.1: Quantity guideline standards

Typology		Quantity Guideline	
		(Hectares per 1,000 population)	(Square Metres per 1,000 population)
Public Open Space	Parks and Gardens	0.80	8,000
	Amenity Greenspace	0.60	6,000
	Natural and Semi-Natural	1.80	18,000
<b>POS total</b>		<b>3.20</b>	<b>32,000</b>
Play Space	Equipped / designated play areas	0.25	2,500
	Other outdoor provision (e.g. MUGAs and skateboard parks)	0.30	3,000
<b>Play total</b>		<b>0.55</b>	<b>5,500</b>
Allotments	Allotments	0.25	2,500
<b>Allotment total</b>		<b>0.25</b>	<b>2,500</b>
<b>TOTAL</b>		<b>4.00</b>	<b>40,000</b>

<sup>3</sup> Local occupancy rate of 2.2 persons per household (2018)

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

<b>Step 3</b>	<b><i>Determine if provision should be on site or offsite?</i></b>
---------------	--

Whether provision should be made onsite or via an offsite contribution is dependent on the size of the development. In the case of larger-scale residential developments, it is expected that provision will be provided onsite. Larger residential developments will have a critical mass of population and should provide all types of open space onsite in order to serve the additional population as a result of the development.

Best practice guidance from organisations like FIT, recommends that provision below certain sizes should not be provided as onsite provision and instead provided as offsite contributions. This is to avoid the creation of numerous small sites often of less recreational value (and quality over time).

New provision should be provided onsite if the scale of the development is above the 'triggers' set out in Table 4.1.2. For play space this is sub-categorised by the recognised types of play facilities (Local Area of Play – LAP; Local Equipped Area of Play – LEAP; Neighbourhood Equipped Area of Play – NEAP). These are based on respective minimum standards for each type of provision as set out in Appendix 5.

*Table 4.1.2: Type of contribution based on scale of development*

<b>Public Open Space</b>	<b>1-9 dwellings</b>	<b>10-14 dwellings</b>	<b>15 dwellings or greater</b>	
	No contribution	Offsite financial contribution (\$106 or from CIL receipts (once adopted))	On site	
<b>Allotments</b>	<b>1-9 dwellings</b>	<b>10-727 dwellings</b>	<b>728 dwellings or greater</b>	
	No contribution	Offsite financial contribution (\$106 or from CIL receipts (once adopted)) for development of 10-727 dwellings	On site provision of land in developments of 728 or more	
<b>Play space<sup>4</sup></b>	<b>LAP</b>	<b>1-7 dwellings</b>	<b>8 dwellings or greater</b>	
		No contribution	On site provision of land	
	<b>LEAP</b>	<b>1-7 dwellings</b>	<b>8-33 dwellings</b>	<b>33 dwellings or greater</b>
		No contribution	Offsite financial contribution (\$106 or from CIL receipts (once adopted)) for development of 10-33 dwellings	On site provision of land and equipment in developments of 33 or more
	<b>NEAP<sup>5</sup></b>	<b>1-7 dwellings</b>	<b>8-83 dwellings</b>	<b>83 dwellings or greater</b>
		No contribution	Offsite financial contribution (\$106 or from CIL receipts (once adopted)) for development of 10-83 dwellings	On site provision of land and equipment in developments of 83 or more

<sup>4</sup> Developments of 8 to 14 dwellings require onsite provision of play space but do not require onsite provision of open space. However, the minimum dimensions and buffer zones for play space (see Appendix Two) should still be followed.

<sup>5</sup> Includes MUGAs (Multi-Use Games Area), skate parks and/or other provision catering for older age ranges



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For example, CIL (once adopted) will be used to collect the money for offsite contributions of public open space from developments of 15 dwellings and under. On sites over 15 dwellings all requirements for public open space will be provided onsite.

Once CIL is adopted, it would be acceptable for example if a site of up to 83 dwellings did not make a section 106 contribution towards a NEAP offsite. Instead the Open Space team at ADC would bid for CIL money towards a specific NEAP to fund.

Only in exceptional circumstances will offsite provision at sites which are within the on-site contribution threshold be considered as an appropriate means of providing open space as an alternative to any onsite provision required. Any proposal for alternative offsite provision must be robustly justified and this provision will be funded by the CIL receipts from the development (unless the CIL rate on the site is £0 in which case, the offsite contribution will be via S106).

Consideration as to the positioning of any new forms of open space and play provision as part of a development must take into account any existing forms of provision. For example, if the border of a development is adjacent to an existing form of open space then consideration must be given to 'extending' that open space provision. This may also assist with bridging existing and new communities together sensitively through new open space provision as well as offering practical logistical solutions. It is also important for existing features such as trees and hedges to be protected and retained where possible.

For allotments, only large-scale developments will need to provide onsite provision. This is to prevent instances of small sites with only a handful of plots being created (as any allotment plots should look to be served by water and other ancillary facilities). The 'trigger' point for when onsite allotment provision is required is in developments of 700 dwellings or greater. For developments below this it is important applicants consult with local custodians of allotments (e.g. ADC, Town and Parish Councils) to ascertain the demand for provision in the local area. For instance, a development may be in an area with a high demand for allotments and/or an existing allotment site may have the potential to be extended to provide additional plots.

The open space requirement as part of a development, regardless of size, should not prevent the incorporation of grass verges, hedges, trees, planted areas and other smaller landscaping features within a development which help to provide visually attractive housing developments. These types of open space are incidental and will not count towards open space provision.

<b>Step 4</b>	<b>Calculate the financial off-site contribution</b>
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If an offsite contribution is required in lieu of onsite provision, the financial contribution towards each provision type should be calculated using the figures and calculation below.

Table 4.1.3: Financial contribution per dwelling rate

	Public Open Space	Play	Allotment (Minimum £1,000)
<b>Cost per Square Metre</b>	£28	£143	£3.50
<b>Contribution per dwelling</b>	£1,971.20	£1,730.30	£19.25

In order to calculate offsite developer contributions, a methodology has been adopted which calculates how much it would cost to provide them. These costs have been calculated using

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local and national information. They have also been benchmarked against other Local Authority costs for providing similar types of provision. Due to the high administrative costs in processing small contributions the minimum Allotments financial contribution will be set at £1,000.

Where off-site contributions are required to deliver new forms of provision (e.g. hub sites or, a new leisure centre, sports hall and/or other appropriate provision), developers will also be required to factor in the land costs needing to be secured. This cost is variable and dependent on circumstances over time as the market value of land changes. For this reason, land costs will need to be negotiated on a case-by-case basis.

An indicative approach to how contributions for land costs should be calculated is provided in Appendix 3.

<b>Step 5</b>	<b>Calculate the contribution for maintenance sums</b>
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A development needs to make appropriate provision of services, facilities and infrastructure to meet its own needs. New forms of provision will add to the existing management and maintenance pressures of the local authority.

Consequently, there continues to be a requirement on developers to demonstrate that where new provision is to be provided it will be managed and maintained accordingly through adequate mechanisms to secure long term stewardship of the asset (e.g. via a trust or adoption by the Local Authority). Developers are therefore required to submit a sum of money in order to pay for the costs of the site's future maintenance using the figures and calculation set out.

Sums to cover the maintenance costs of a site (once transferred to the Council) should cover a period of 20 years.

For larger sites, where onsite provision is to be provided, maintenance charges are likely to be the only financial contribution needing to be paid. For smaller, non-strategic sites, all offsite contributions will be through CIL receipts.

Commutated sums for maintenance need to be based on the following costs per square metre. For public open space three rates are stipulated dependent upon the size of the open space needing to be maintained. For play provision an annual cost is detailed. This is a high gross maintenance cost but determining the developer financial contributions will be based on a net additional maintenance cost to be determined by the Local Authority. It is important that this calculation is taken as a starting point and could differ based on the maintenance contract that the council has in place at the time.

Table 4.1.4: Maintenance costs

Provision type		Cost of maintenance for a 20-year period (per Square Metre)
POS	Less than 0.1 ha	£23.51
	0.1 to 1 ha	£16.88
	Greater than 1 hectare	£11.23

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Provision type	Annual cost
Play space	£1,500

<b>Step 6</b>	<b><i>Identify sites which could benefit from an offsite contribution</i></b>
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The new population arising from the development will result in increased demand to existing forms of provision; subsequently offsite contributions need to be used to enhance the quality of and/or access to existing provision within an acceptable distance to the development.

This step should help the relevant Council department to bid for CIL money towards a specific requirement to be funded. As once CIL is adopted, it will be used as the mechanism for offsite contributions for non-strategic sites.

Sites identified as being below the quality and value thresholds are summarised in Part 3 (p10-11) of the Open Space Standards Paper<sup>6</sup>. Consequently, these sites may benefit most from some form of enhancement.

There is a need for flexibility to the enhancement of lower quality and/or value sites within proximity to a new housing development. In some instances, a better use of resources and investment may be to focus on facilities further away which offer more suitable sites for enhancement as opposed to trying to enhance a site that is not appropriate or cost effective to do so close by.

In such cases, consider those sites identified as helping to serve 'gaps' in provision (as set in Part 4, p14-15, of the Standards Paper). Such sites play an important role in ensuring access to open space provision. Similarly, if any key sites of significance are within the accessibility distance to the development, then these sites may be better suited for offsite contributions. This will help to ensure efficient use of contributions and maximise enhancements. For example, if a prominent park is located close to the development, then an offsite contribution to enhance that site is still warranted as the park site is likely to have a strong attraction and level of use for new residents for a variety of reasons/uses.

### ***Commercial development***

Local Plan Policy HWB SP1 supporting text (para 14.1.7) suggests that commercial uses (e.g. B1, B2 and B8 and retail class) may be expected to contribute appropriate forms of provision. However, in reality the demand generated from such developments is not likely to be significant or viable and it is not therefore, included within this SPD.

<sup>6</sup> <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n9627.pdf&ver=9500>

## **4.2 Playing pitches**

All developments of 10 dwellings or greater are expected to contribute to the provision of playing pitches.

For playing pitches (including 3G pitches), contributions will be via section 106 for strategic developments and via CIL (once adopted) for non-strategic sites. For those strategic developments where a sports 'hub' site is proposed, onsite contributions via section 106 is required. Once the CIL is adopted non-strategic sites will be subject to CIL being used for offsite financial contributions.

Playing pitch requirements cannot be used to offset open space requirements as they are considered separate components of need.

<b>Step 1</b>	<b><i>Determine the playing pitch requirement resulting from the development</i></b>
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The main tool for determining this is the PPS New Development Calculator which is a Sport England tool provided on completion of the Playing Pitch Strategy.

The PPS Assessment Report estimates demand for key pitch sports (football, rugby, hockey and cricket) based on ONS population forecasts and club consultation. This demand is translated into teams likely to be generated, rather than actual pitch provision required.

The PPS New Development Calculator adds to this, updating the likely demand generated for pitch sports based on new housing increases and converts the demand into match equivalent sessions and the number of pitches required. This is achieved by taking the current demand/team generation rates (TGRs) and population in the PPS Assessment Report to determine how many new teams would be generated from an increase in population derived from housing growth. This also gives the associated costs of supplying the increased pitch provision.

Part 4 of PPS New Development Calculator provides an estimation of the number of new pitches that would be required to meet the match equivalent sessions presented in Part 2. Part 4 also presents an estimate of the associated costs for providing these new pitches. Please note that these are indicative costs only and appropriate local work should be undertaken to determine the true costs of any new pitches.

For 3G pitches, the supply and demand of provision is set out in the PPS. However, the Sport England Facilities Calculator (SFC) is used to calculate contributions. This is discussed further in Part 4.3.

<b>Step 2</b>	<b><i>Determine whether new provision is required and whether this should be on or off site</i></b>
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Where the calculator does not create demand for a whole pitch, which is often the case for smaller size developments, it is recommended to make a contribution to increasing the capacity of an existing site to meet demand generated from the development. This will come from section 106 where appropriate or via the CIL receipts once CIL is adopted.

This step should help the relevant Council department to bid for CIL money towards a specific requirement to be funded. This is because, once CIL is adopted, it will be used as the mechanism for offsite contributions for non-strategic sites.

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Demand equating to the need for a new pitch can be translated as follows:

- ◀ For football and rugby demand, one match equivalent session per week is needed to represent demand for one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For hockey, demand for four match equivalent sessions per week is needed to represent demand for one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For cricket, demand for 60 match equivalent sessions per season is needed to represent demand one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For 3G pitches, the PPS identifies demand for four full size 3G pitches (two based on current demand and two based on future demand).

Once the demand from new developments is quantified, Sport England advocates evaluation on whether existing provision within an appropriate distance of the development is able to meet the additional need.

Consider if the nearest site/s to the development containing that type of provision could benefit from a contribution towards increasing capacity and/or quality to meet likely need generated from the development. If there are no potential options to improve existing or extend planned provision to create additional capacity then new provision may be required.

Alternatively, when identifying a site for offsite contributions, consider the proximity and location of any Hub sites or Key centres within the analysis area. These strategic forms of provision are identified by the Local Authority as priorities for investment in order to meet the known future demand and trends for pitch sports in the area.

The Arun Playing Pitch Strategy and Action Plan (Part 6) will assist in identifying the existing sites with the potential to accommodate additional play. It identifies sites based on their strategic importance in a District-wide context i.e. they accommodate the majority of demand or identify where the recommended action has the greatest impact on addressing shortfalls identified either on a sport-by-sport basis or across the Council area as a whole.

<b>Step 3a</b>	<b><i>Determine how best to satisfy demand through new onsite provision</i></b>
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To further help determine how best to satisfy demand for new onsite provision, use the Playing Pitch Strategy (Part 1 Headline Findings) to identify existing shortfalls and consult with local clubs/groups to identify local issues.

Although the Playing Pitch Strategy will help to identify existing shortfalls (and in doing so provide a guide as to how best to meet demand generated from the new development), useful questions to answer may include, for example:

- ◀ Are there any teams/clubs playing outside of the local area (displaced demand) which could utilise provision at the site?
- ◀ Do any local clubs identify existing plans/demand for access to new provision?
- ◀ Are there any overplayed sites in the local area where existing demand could be transferred to a new site?
- ◀ Do any local clubs identify any latent demand (i.e. if they had access to more pitches they could they field more teams?)

<b>Step 3b</b>	<b><i>Determine how best to satisfy demand through new offsite provision</i></b>
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Consider the location of the new population (e.g. the location of the development site) alongside the results of the PPS work. This will enable an understanding of the nature of the current playing pitch sites within an appropriate catchment of the new population in relation to issues in the area. This may lead to suggestions of one or more options of meeting the estimated demand, such as:

- ◀ Enhancing existing pitches to increase their capacity and ensure adequate maintenance to maintain the higher level of use
- ◀ Securing greater community access to currently restricted provision and undertaking necessary works to allow such use to occur (e.g. enhanced changing provision)
- ◀ Providing new playing pitches on existing sites or as part of the development.

This decision should be based on the potential to improve existing facilities within an appropriate catchment of a development to create additional capacity, and how realistic it is given the nature of the local area to provide new provision. For example, there may be some poor quality playing fields that could potentially be improved with additional drainage and long-term maintenance works.

This may also include enhanced and/or new changing provision, to enable their use to be increased, thereby creating additional capacity to meet the increased demand generated from the development.

Discussions should be held with relevant parties (e.g. landowners, facility operators, National Governing Bodies of Sport and user groups), and any further necessary evidence gathered (e.g. a feasibility study), to help identify the specific works that are required, and to ensure they will provide the necessary additional capacity to meet the needs. It will also be important to demonstrate that the specific works can be delivered within an appropriate timescale in relation to the occupation of the development site

<b>Step 4</b>	<b><i>Consider design principles for new provision</i></b>
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The exact nature and location of provision associated with onsite developments should be fully determined in partnership with each relevant National Governing Body of Sport. Further to this, each pitch sport National Governing Body of Sport provides national guidance in relation to provision of new pitches (See Appendix 2).

There is also a need to ensure that the location of outdoor sports pitches and ancillary facilities are appropriately located in the context of indoor sports provision and 3G pitches (if also being provided onsite) to ensure a cohesive approach to the whole sporting offer. Consideration should be given to the provision of community sports hubs.

<b>Step 5</b>	<b><i>Calculate the financial contribution required</i></b>
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As cited above, the Playing Pitch New Development Calculator should be used for grass pitches as this presents an estimate of the associated costs for providing new pitches. It also provides a figure for the lifecycle costs for new or enhanced provision.

**For 3G pitches, the Sport England Facilities Calculator should be used as set out in Part 4.3.**

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Along with any capital costs for the works, contributions should ensure an appropriate level of lifecycle costs towards the new or enhanced provision. This is required to cover the day to day maintenance for an agreed long term period and to help ensure a sinking fund exists for any major replacement work, e.g. the future resurfacing of an artificial grass pitch.

#### *Ancillary facilities*

It is imperative that there is a need to secure contributions for pitch provision. Contributions should also be sought for improving and providing changing room accommodation where required. The following provides a guide as to how this could be calculated.

- ◀ Changing facilities are required for all new pitches
- ◀ Changing provision requirements are reliant on the number of pitches not the size of pitches (sites with more than one senior pitch should ideally have changing provision).
- ◀ Figures are based on Sport England quarterly costs (any calculations need to change each quarter): <https://www.sportengland.org/media/13346/facility-costs-q2-18.pdf>
- ◀ Consideration should also be given to the need for pavilion/clubhouse facilities and community use space to be provided as well as opportunities for income generation. In some cases, this may be in the form of a community sports hub model.
- ◀ Adequate car parking must be provided including the potential for overspill parking at peak periods. Coach as well as car parking will usually be required and service vehicle access and turning must also be considered. Use Sport England guidelines for further detail <https://www.sportengland.org/media/4204/car-parking.pdf>
- ◀ Cycle parking close to the changing facilities should be provided and should have a canopy.

There is also a need to ensure that the location of sports pitches and ancillary facilities are appropriately located in the context of indoor sports provision and 3G pitches (if also being provided) to ensure a cohesive approach to the whole sporting offer.

The offsite contributions being sought can be used to provide a range of improvements and not just pitch based enhancements (as long as they are in line with the needs set out in the PPS). For instance, improvements may range from providing sports lighting to increasing the hours a facility can be used through to ancillary infrastructure which supports the continued or enhanced community use of a facility (e.g. changing rooms, public conveniences, showers, cycle parking etc).

The preference, where possible, is for contributions to pitch and/or ancillary facilities to be provided at sites controlled by the local authority. This is to avoid the provision of inappropriate facilities (e.g. standalone single pitch sites) and to negate any issues with exclusivity of use.

### **4.3 Indoor and built sports facilities**

All developments of 10 dwellings or greater are expected to contribute to the provision of indoor and built sports facilities.

Strategic housing allocations will contribute towards provision via s106. Non-strategic developments sites will contribute via CIL (once adopted).

<b>Step 1</b>	<b><i>Determine the key indoor and built sports facility requirement resulting from the development</i></b>
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The key tool to assess this is Sport England's Facilities Calculator (SFC). This model was created to assist local planning authorities to quantify how much additional demand for the key community sports facilities is generated by populations of new growth, development and regeneration areas. It helps to answer questions such as, "How much additional demand for swimming will the population of a new development area generate?" and "What would the cost be to meet this new demand at today's values?"

The SFC is designed to estimate the needs of discrete populations for sports facilities (such as sports halls and swimming pools) created by a new residential development. The current facilities that the SFC can be used for include swimming pools, sports halls and 3G pitches.

The SFC uses information that Sport England has gathered on who uses facilities and applies the population profile of the local area. This ensures that the calculations are sensitive to the people who actually live there. The SFC then turns this estimation of demand (visits per week) into the equivalent amount of facility which is needed to meet these visits each week. For swimming pools it uses square metres of water, lanes and 25m, four lane pool units. For halls, it uses the number of badminton courts and four court hall units as a guide for the additional area required to meet the increase in demand.

The SFC will give a target total for the number of facilities that are needed to meet a population's sports facility needs. This is based on the local population, national participation rates and the national average for facility usage.

The SFC generates a cost figure for any housing development, using the estimated additional population generated by the new housing development. The calculation is unique to the district as it uses local weightings for Arun District and West Sussex.

The SFC automatically applies the Building Cost Information Service's (BCIS) Pricing Adjustment Factors to the facility costs. Facility capital costs are updated on an annual basis in conjunction with information provided by the BCIS and other quantity surveyors. Therefore, any examples provided within this SPD include indicative costs based on the most up to date data provided by the SFC (facility costs are based on BCIS data from May 2018 and building costs for Q2 2018). Actual costs for individual developments will be calculated based on the most up to date data at the time of application.

The SFC can be accessed via registering for free on the Active Places Power website.

The Arun Indoor Sport and Built Facilities Strategy is used to help inform and direct the priorities for indoor and built sports facilities across the area.



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As the exact number of units are identified from specific housing developments then the Council will apply the household occupancy rate to this to determine the total population.

$$\text{Number of dwellings} \times \text{household occupancy rate}^7 = \text{associated population}$$

This is the population applied within the Sports Facilities Calculator (SFC) to determine the additional provision that is required to meet the additional demand and the associated financial contribution required.

<b>Step 2</b>	<b><i>Determine the other indoor sports and community facilities required as a result of the development</i></b>
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There is no national calculation to the requirements from new housing developments for other indoor sports provision and community centre facilities not covered by the SFC (i.e. health and fitness suites).

In such instances, the Indoor Sport and Built Facilities Strategy and Assessment will inform the need for additional facilities within the area. In this case, a current and future shortfall in health and fitness suites is identified across Arun. The Strategy identified that 'demand is not currently being met for health and fitness suites and should penetration rates continue to increase, alongside population increases, there will be significant shortfalls in the future'.

Consequently, the following calculation should be used to determine the requirement for health and fitness provision. An excel calculator is available to assist in calculating the requirements for health and fitness provision for developments.

*Table 4.3.1: Calculating Health and Fitness contribution*

2a	<b>Estimated new population to use H&amp;F</b> = New population generated x National penetration rate for H&F of 14% (New population generated x 0.14)
2b	<b>Pieces of equipment required</b> = Estimated new population to use H&F (2a) / National average number of users (25) per equipment piece
2c	<b>Space required to accommodate equipment</b> = Pieces of equipment required (2b) x Average square metres (5) per equipment piece
2d	<b>Financial contribution required</b> = Space required to accommodate equipment (2c) x Estimated build and equipment cost per square metre (£2,000)

This will also be informed by how busy existing facilities are. As an example, if an existing community centre (adjacent to the new housing development) is fully programmed with high demand for space, it is unrealistic to expect this facility to accommodate the demand generated from the new development. Therefore, additional provision will be required.

<b>Step 3</b>	<b><i>Demonstrate an understanding of what else the development generates demand for</i></b>
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Consideration also needs to be given to the other infrastructure that will be generated as a result of the development. As an example, this could include health centres, library, etc.

The key focus here is to determine where there may be duplication of facilities and where there may be opportunities for shared provision possibly as part of a hub or new leisure centre.

<sup>7</sup> Local occupancy rate of 2.2 persons per household (2018)

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The master plan for any new development needs to consider the strategic location of facilities and the clustering and co-location of facilities in order to maximise the benefit for the local community. Furthermore, the long term approach to delivering these co-located facilities is set out in the district's Infrastructure Capacity Study and Delivery Plan which sets out the infrastructure requirements on the district's strategic housing allocations.

There is also a need to ensure that the location of outdoor sports pitches and ancillary facilities are appropriately located in the context of indoor sports provision and 3G pitches (if also being provided onsite) to ensure a cohesive approach to the whole sporting offer.

The financial, social and sporting benefits which can be achieved through development of strategic sites (also known as hub sites) are significant. Sport England provides further guidance on the development of community sports hubs at:

[http://www.sportengland.org/facilities\\_planning/planning\\_tools\\_and\\_guidance/sports\\_hubs.aspx](http://www.sportengland.org/facilities_planning/planning_tools_and_guidance/sports_hubs.aspx)

<b>Step 4</b>	<b><i>Financial contributions to deliver strategic provision</i></b>
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The cumulative effect of multiple developments across the local authority results in a combined increase on demand to warrant a new strategic leisure centre development. The phasing requirements of strategic housing site developments within the District up to 2031 from the Infrastructure Capacity Study and Delivery Plan 2017 is shown in Table A3.1 and A3.2 of Appendix 3. The current housing trajectory, additional cumulative population increase and SFC is used to show when there will be a requirement for new sports hall space and swimming pool lanes that would form part of a new leisure centre for the District. This only accounts for the population increase from strategic housing sites it does not take into account the population increase to come from non-strategic sites. Therefore, it is expected that a new leisure centre will be required at an earlier stage dependant on the delivery of non-strategic housing developments.

As an example, for Arun a new flexible sports hall facility (to an equivalent size of a 4-court badminton hall<sup>8</sup>) is required where an additional 15,000 people are generated as a result of cumulative strategic housing developments. Based on the SFC this requirement is estimated to be in 2025. Similarly, a 4 lane 25m swimming pool is required where an additional 21,000 people are generated as a result of cumulative strategic housing developments. Based on the SFC this requirement is estimated to be in 2028. Both estimated dates only take account of demand from strategic housing developments they do not take into account the population increase from non-strategic sites. An explanation to how this is determined is set out in Appendix 3.

The demand generated in turn puts additional pressure on the existing infrastructure. Therefore, if no new provision is planned this additional demand has nowhere to go. The Indoor Sport and Built Facilities Strategy identified that 'sports halls are operating near to capacity, offering little scope to expand, meaning that future demand will have to be accommodated at new facilities'.

It also stated that 'pools are generally only servicing Arun residents with almost 95% of currently used capacity from within Arun. However, 18% of demand is exported to other local authorities, suggesting there is insufficient capacity within Arun to satisfy all of the demand.'

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<sup>8</sup> Indicative example. Actual requirement could be in a different form of activity space but to an equivalent size.

Financial contributions for indoor and built sports facilities will be allocated to:

- ◀ Enhancement of existing forms of provision
- ◀ Contributing to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision of this type.

In order to calculate the contribution from each housing development into a strategic leisure facility fund, developers should use the Sport England Sports Facilities Calculator. Using the population growth and process identified from Step 1 and Step 2 will identify the financial contributions required from each development.

The SFC generates a cost figure for any housing development. It utilises the estimated additional population generated by the new housing development. The SFC automatically applies the Building Cost Information Services (BCIS) Pricing Adjustment Factors to the facility costs.

For developments where contributions are required to contribute to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision, developers will also be required to agree and pay towards the land costs needing to be secured.

This cost is variable and dependent upon the precise location and situation of the proposed development and/or provision looking to be provided. This will also be subject to change over time as the market value of land alters. For this reason, land costs will need to be negotiated on a case-by-case basis.

An indicative approach to how contributions for land costs should be calculated is provided in Appendix 3.

### ***Commercial development***

Commercial development is also expected to contribute to indoor and built sports facilities since employees will put pressure on existing provision (i.e. during lunch breaks, before and after work). This follows Policy HWB SP1 which states such users will contribute towards an increased level of demand on existing provision within that locality which means that a developer contribution is justified.

This will be negotiated where appropriate by the Council.

**APPENDIX ONE: OFFSITE CONTRIBUTIONS AND MAINTENANCE COSTS FOR OPEN SPACE AND PLAY SPACE**

This appendix explains the source and basis for the costs used in calculating the financial contributions for open space and play provision. These are specific to Arun and where possible have been benchmarked against neighbouring and/or similar local authorities.

**Offsite contribution costs**

The following rates are to be charged per square metre in instances where off site contributions are required.

*Table A1.1: Rate of charge by provision type*

<b>Provision type</b>	<b>Offsite contribution (£ per Square Metre)</b>
Open Space	28
Play Space	143
Allotment	3.50

The rate of charge for open space provision is based on the average charge for each of the open space sub-types which are considered as being open space provision (i.e. parks, amenity greenspace and natural and semi-natural greenspace). The 2016 Open Space Study provided an initial set of rates to be considered for charging as offsite contributions. These have been reviewed and updated to, for example, avoid any instances of duplication. These rates then been combined to provide an average rate of £28 per square metre to be charged for offsite contributions to open space. This is comparable to neighbouring local authorities such as Chichester which charges an equivalent average of £34 per square metres for the same open space types.

The rate of charge for play provision is based on the average cost of a typical form of play facility as determined by the Local Authority. An area of play of 700 square metres (or equivalent to 0.07 hectares)<sup>9</sup> is estimated to cost £100,000. This works out as an equivalent to £143 per m<sup>2</sup> (e.g. 100,000 / 700 = 142.86). Offsite contributions for play provision are therefore charged at £143 per square metre. This is comparable to neighbouring local authorities such as Chichester which charges an equivalent of £170 per square metre for play.

The rate of charge for allotment provision is based on the Local Authorities known costs for elements which are applicable to an allotment site (i.e. fencing, paths, etc). This is calculated as an equivalent to £3.44 per square metre. Consequently, the rate of £3.50 per square metre is to be charged for offsite contributions to allotments.

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<sup>9</sup> Based on average site size of 0.07 hectares as recorded from audit assessment

### Maintenance costs

Sums to cover the maintenance costs of an open space and/or play site (once transferred to the Council) should be intended to cover a period for 20 years.

Committed sums for maintenance need to be based on the following costs per square metre. For public open space three rates are stipulated dependent upon the size of the open space needing to be maintained. For play provision an annual cost is detailed. These rates are based on the known cost of the Local Authorities grounds maintenance. This is a high gross maintenance cost but determining the developer financial contributions will be based on a net additional maintenance cost to be determined by the Local Authority. It is important that this calculation is taken as a starting point and could differ based on the maintenance contract that the council has in place at the time.

*Table A1.2: Maintenance charge by typology*

Provision type		Cost of maintenance for a 20-year period (per Square Metre)
POS	Less than 0.1 ha	£23.51
	0.1 to 1 ha	£16.88
	Greater than 1 hectare	£11.23

Provision type	Annual cost
Play space	£1,500

For larger sites, where onsite provision is to be provided, maintenance charges are likely to be the only financial contribution needing to be paid. For smaller, non-strategic sites, all offsite contributions will be through CIL receipts.

### Future cost increases

Cost charges are updated on an annual basis. This is through an annual review to check charges are still accurate and through linking the cost charges to a recognised national figure i.e. the Consumer Price Index (CPI).

The CPI measures the change in the cost of a representative sample of items. It is therefore a useful tool to ensure the offsite contributions being sort for play space is reflective of changes in inflation across the country.

The calculation for undertaking this is to take the current cost charge and calculate the percentage increase as a result of the CPI at the end of each financial year (i.e. end of March)

*Hypothetical example:*

Current cost charge for play space is £143 per m<sup>2</sup>

CPI value at end of March 2018 is 2.3%<sup>10</sup>

<sup>10</sup> <https://www.ons.gov.uk/economy/inflationandpriceindices/timeseries/l55o/mm23>

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Therefore, if the cost charge were to be recalculated for the next 12 months

$$143 / 100 \times 2.3 = 3.29$$

The cost charge would be (143 + 3.29) £146.29 (£146) per m<sup>2</sup>

This will be reviewed by ADC every 12 months to reflect the CPI value.

## **APPENDIX TWO: DESIGN PRINCIPLES OF NEW PROVISION**

It is important for new forms of open space, playing pitch, indoor and built sports facilities to be well designed. This is in order to provide good quality, usable and efficient forms of provision. Creation of specific masterplans for larger scale developments should be undertaken to set out the requirements and guide the future growth.

The following information is provided as a guide in initiating the first stages of design. Pre-application discussions are encouraged with the Council to ensure suitably designed open space, playing pitch, indoor and built sports facilities are provided.

### **Active Design**

Sport England's Active Design looks at the opportunities to encourage sport and physical activity through the built environment in order to support healthier and more active lifestyles.

It sets out ten principles that should be considered during urban design to promote environments that offer individuals and communities the greatest potential to lead active and healthy lifestyles. These principles are then broken down into three objectives: access, awareness and amenity.

The 10 principles are:



The guidance also highlights best practice pointers including:

- ◀ Seek to concentrate key uses (schools, shops, workplaces, homes etc) to encourage linked trips and create varied and active centres
- ◀ Opportunities should be explored to create public spaces that encourage uses to interact including seating areas, multi-use landscaping and attractive spaces
- ◀ Co-located facilities should be focal points within walking and cycling networks
- ◀ Opportunities to co-locate complimentary functions (such as health centres and gyms) should be fully explored

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- ◀ Sports facilities should be located in prominent positions in the local community, raising awareness of their existence, inspiring people to use them and ensuring they can become focal points for the community and social interaction
- ◀ Multiple sports and recreation facilities should be co-located together where possible, to allow a choice of activity in one location, and promote the efficient shared management of facilities. These should take a prominent position within local networks
- ◀ School facilities and grounds should be available for use outside school time to support the whole community to engage in physical activity

A series of best practice case studies are set out within the Active Design document and also on the Active Design website (<https://www.sportengland.org/facilities-planning/active-design/>)

#### Design principles of open space and play space

##### Play space

Fields in Trust (FIT)<sup>11</sup> offer some guidance to the spatial requirements for play facilities. It also suggests appropriate buffer zones to ensure play facilities do not enable users to overlook neighbouring properties; reducing the possibility of conflict between local residents and those at play. The minimum size and buffer zones suggested are:

Table A2.1: FIT buffer zones

Type	Size (hectares)	Minimum dimensions	Buffer
LAP	0.01	10 x 10 metres	5m minimum separation between activity zone and the boundary of dwellings
LEAP	0.04	20 x 20 metres	20m minimum separation between activity zone and the habitable room façade of dwellings
NEAP	0.10	31.6 x 31.6 metres	30m minimum separation between activity zone and the boundary of dwellings
Other <sup>12</sup>	0.10	40 x 20 metres	30m minimum separation between activity zone and the boundary of dwellings

Play England also offer guidance within its *Design for Play: A guide to creating successful play spaces*. This offers a detailed level of advice towards the design of play facilities. Key to the guidance are the 10 principles.

The 10 principles for designing successful play spaces states provision should be:

- ◀ Bespoke
- ◀ Well located
- ◀ Make use of natural elements
- ◀ Provide a wide range of play experiences
- ◀ Inclusive to all
- ◀ Meet community needs
- ◀ Allow children of different ages to play together
- ◀ Build in opportunities to experience risk and challenge
- ◀ Sustainable and appropriately maintained
- ◀ Allow for change and evolution

<sup>11</sup> Guidance for Outdoor Sport: Beyond the Six Acre Standard

<sup>12</sup> E.g. skate park, Multi-Use Games Area



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Other good practice considerations which elaborate on the principles for designing successful play spaces include:

- ◀ Positioned in a good location, away from hazards and with sufficient natural surveillance
- ◀ Accessed via a suitable pathway and a well-used route
- ◀ Equipment should not overlook gardens (in accordance with buffer zone guidance)
- ◀ Suitable fencing and surfacing
- ◀ Minimum provision of one litter bin
- ◀ Seating should have back and arm rests
- ◀ Two gated access points; based on the location of the play space. For instance, if located close to a road, site may require a combination of slowing designs including surfaces, staggering and barriers
- ◀ Equipment should comply with EN 1176 (European Equipment Standard)

#### **Open space**

Open space is defined in the Town and Country Planning Act (1990) as *land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground.*

The following provide guidelines to what new forms of public open space should be.

Fields in Trust offer some guidance to the quality guidelines for open space. These include:

- ◀ Located where they are of most value to the community to be served
- ◀ Sufficiently diverse recreational use for the whole community
- ◀ Appropriately landscaped
- ◀ Maintained safely and to the highest possible condition with available finance
- ◀ Positively managed taking account of the need for repair and replacement over time
- ◀ Provision of appropriate ancillary facilities and equipment
- ◀ Provision of footpaths
- ◀ Designed so as to be free of the fear of harm or crime

A well-designed open space should be attractive, usable and aim to provide multiple social, health and environmental benefits. It should incorporate existing landscape features such as mature trees and hedgerows, appropriate new planting, play provision and car parking/cycle storage. It is important that the biodiversity of a site is considered through inclusion of native species and the creation/retention of a variety of habitats.

#### **Public open space guidelines**

On this basis, ADC considers the following guidelines to define what new forms of public open space should and should not be.

Public open space **should be:**

- ◀ Located within new residential areas in accessible parts of the development avoiding conflict with major hazards such as busy roads
- ◀ Linked to local paths/cycle ways and the area beyond the development and have well placed entry points to encourage safe access
- ◀ Distributed evenly throughout the site with consideration of larger central areas of public open space which could accommodate a wider range of uses, forming a focal point for new communities

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- ◀ Welcoming to encourage people to use them with soft landscape features, containing high quality materials, well maintained boundaries with an attractive appearance
- ◀ In areas which are overlooked by housing to provide natural surveillance
- ◀ Considerate to existing and established landscape features including existing trees and hedgerows and work with these to retain and enhance them.

#### Public open space **should not be:**

- ◀ Provided on spaces left over after the planning process has been concluded i.e. areas of land left over after the location of roads and buildings have been determined
- ◀ Unusable or undesirable areas without any purpose. The inclusion of undesirable areas with no clear function will not be allowed simply to make up the required numbers.
- ◀ Including narrow verge areas or entrance roadways
- ◀ Including SUDs or drainage areas which whilst an environmental benefit is recognised as not being permanently publicly accessible i.e. in water holding periods.
- ◀ Including bunds or mitigation screen planting areas, fenced off areas, narrow strips of land, or small pockets of land in place as development separation areas as these are not publicly accessible

The Bersted development is recognised as having a good quality design. It should act as an aspiration and local best practice example for future developments of this scale and nature. The details of this development are set out in Appendix 7.

#### Design principles of playing pitches

Sport England provides a guide to practical advice on building and maintaining playing fields and sport pitches<sup>13</sup>, including:

- ◀ Design guidance
- ◀ Standard pitch layouts
- ◀ Construction specifications
- ◀ Costs

This highlights the need for provision to be designed based on its likely use i.e. who will use the pitches and how often. Key considerations include drainage, quality construction and long-term management.

Sport England has also worked closely with National Governing Bodies of Sport such as the Football Association, the England and Wales Cricket Board and the Institute of Groundsmanship to develop a document<sup>14</sup> identifying the key issues, tips and case studies.

Layout of pitches is recognised as being dependent on each individual site. However, it is important to consider the areas of most wear and tear. Useful tips include:

- ◀ Orientation should broadly be north south
- ◀ Periods of recover should be ensured for a sustainable site
- ◀ Three year pitch layout rotation to allow sufficient recovery
- ◀ Off-setting the location of goal mouths and centre cycles
- ◀ Mobile counter weighted goalposts – to help facilitate easy pitch rotation

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<sup>13</sup> Natural Turf for Sport Design Guidance Note

<sup>14</sup> Successful management of dual use cricket and football sites (2014)

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Further to this, each pitch sport NGB provides national guidance in relation to provision of new pitches. Follow the links to the various web pages for further details:

- ◀ [FA facility guidance](#)
- ◀ [FA 3G pitch guidance](#)
- ◀ [RFU Facilities Guide](#)
- ◀ [ECB guide to developing pitches](#)
- ◀ [England Hockey Facilities Strategy](#)

For improvement/replacement of AGPs refer to Sport England and the NGBs 'Selecting the Right Artificial Surface for Hockey, Football, Rugby League and Rugby Union' document for a guide as to suitable AGP surfaces: [www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-surfaces/](http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-surfaces/)

#### **Design principles of indoor and built facilities**

It is important to ensure that the design of new or extended facilities is in line with local needs as well as relevant design guidance. It will be important that any design reflects best practice design guidance taking into account all the key considerations which will be relevant to each facility. As an example, this will include aspects such as: health and safety, safeguarding, storage, sport specific design features, etc.

Where an extension or refurbishment of an existing facility takes place it will be important to ensure that continuity of provision is considered as clubs and organisations will need alternative accommodation during the construction period associated with a refurbishment or extension. This is important in ensuring these organisations continue to exist in the longer term.

The development of community hubs is a key focus for many organisations as the benefits derived from the co-location of facilities is often greater than from stand-alone facilities. This is also in line with other guidance such as Sport England's Active Design. Therefore, there is a need for developers and stakeholders to consider how different facilities may 'fit' together. As an example, this could include the following facilities which may be required as part of a development:

- ◀ Indoor and outdoor sports facilities
- ◀ Health centres and GP surgeries
- ◀ Library
- ◀ Early years provision
- ◀ Community centre
- ◀ Children's play areas
- ◀ Allotments and community growing areas
- ◀ Local retail centres

The master plan for any new development needs to consider the strategic location of facilities and the clustering and co-location of facilities in order to maximise the benefit for the local community.

There is also a need to ensure that the location of outdoor sports pitches and ancillary facilities are appropriately located in the context of indoor sports provision and 3G pitches (if also being provided onsite) to ensure a cohesive approach to the whole sporting offer.

Sport England provides further guidance at: <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/>

**APPENDIX THREE: CUMULATIVE DEMAND FOR INDOOR AND BUILT SPORTS FACILITIES**

Sport England's Facilities Calculator (SFC) is utilised to quantify how much additional demand for key community sports facilities will be generated by populations of new growth and development. It sets out the cost of providing the facilities that are needed to meet the sports facility needs of the new population.

Financial contributions for indoor and built sports facilities will go towards:

- ◀ Enhancement of existing forms of provision
- ◀ Contributing to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision of this type.

The cumulative effect of multiple developments across the local authority results in a combined increase on demand to warrant a new strategic leisure centre development. The phasing requirements of strategic housing site developments within the District up to 2031 from the Infrastructure Capacity Study and Delivery Plan 2017<sup>15</sup> is shown in Table A3.1 and A3.2 of Appendix 3. The current housing trajectory, additional cumulative population increase and SFC is used to show when there will be a requirement for new sports hall space and swimming pool lanes that would form part of a new leisure centre for the District. This only accounts for the population increase from strategic housing sites it does not take into account the population increase to come from non-strategic sites. Therefore, it is expected that a new leisure centre will be required at an earlier stage dependant on the delivery of non-strategic housing developments.

The figures suggest on initial review an equivalent requirement of six badminton courts<sup>16</sup> and over four-lanes of equivalent swimming space up to 2030/31. On closer inspection, for Arun a new flexible sports hall facility (to an equivalent size of a 4-court badminton hall<sup>17</sup>) is required where an additional 15,000 people are generated as a result of cumulative strategic housing developments. Based on the SFC this requirement is estimated to be in 2025. Similarly, a 4 lane 25m swimming pool is required where an additional 21,000 people are generated as a result of cumulative strategic housing developments. Based on the SFC this requirement is estimated to be in 2028. Both estimated dates only take account of demand from strategic housing developments they do not take into account the population increase from non-strategic sites. An explanation to how this is determined is set out in Appendix 3.

The housing trajectory only covers the delivery of strategic housing allocations. It does not include the number of dwellings from non-strategic sites, the land availability assessment or windfall allowance. Strategic sites will contribute to this cumulative need for a new leisure centre, community sports hubs and/or other appropriate provision through s106 contributions. Other developments, such as non-strategic sites, will contribute to the cumulative need through CIL receipts.

The SFC is updated annually and therefore, any examples provided within this SPD include indicative costs based on the most up to date data provided by the SFC at the time of writing.

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<sup>15</sup> Figures are subject to change

<sup>16</sup> Actual form of activity space is flexible but should be to an equivalent size of a six-badminton courts

<sup>17</sup> Indicative example. Actual requirement could be in a different form of activity space but to an equivalent size.

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Table A3.1: Phasing of requirements up to 2025/26<sup>18</sup> for Strategic Housing Sites

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
<b>Total dwellings</b>	122	630	1,035	1,000	1,050	1,025	1,000	925	775
<b>Estimated population</b>	268	1,386	2,277	2,200	2,310	2,255	2,200	2,035	1,705
<b>Cumulative population</b>	268	1,654	3,931	6,131	8,441	10,696	12,896	14,931	16,636
<b>Equivalent sports hall requirement (courts)</b>	-	0.44	1.04	1.62	2.23	2.89	3.4	3.94	4.39
<b>Cost (£)</b>	-	297,011	705,896	1,100,953	1,515,763	1,969,720	2,315,754	2,681,182	2,987,351
<b>Equivalent swimming pool requirement (lanes)</b>	-	0.31	0.73	1.14	1.57	2.04	2.4	2.78	3.09
<b>Cost (£)</b>	-	319,818	760,100	1,185,492	1,632,155	2,120,970	2,493,575	2,887,064	3,216,743

Table A3.2: Phasing of requirements from 2026 up to 2030/31 for Strategic Housing Sites

	2026/27	2027/28	2028/29	2029/30	2030/31
<b>Total dwellings</b>	725	713	675	525	450
<b>Estimated population</b>	1,595	1,569	1,485	1,155	990
<b>Cumulative population</b>	18,231	19,800	21,285	22,440	23,430
<b>Equivalent sports hall requirement (courts)</b>	4.81	5.22	5.61	5.62	6.18
<b>Cost (£)</b>	3,273,768	3,555,516	3,822,179	4,029,584	4,207,360
<b>Equivalent swimming pool requirement (lanes)</b>	3.39	3.68	3.96	4.17	4.36
<b>Cost (£)</b>	3,525,153	3,828,536	4,115,676	4,339,007	4,530,434

<sup>18</sup> Source: Infrastructure Capacity Study and Delivery Plan 2017 (Tables do not include population increase for non-strategic housing developments)

### **Calculating land costs**

For developments where contributions are required to contribute to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision, developers are also required to agree and pay towards the land costs needing to be secured.

This cost is variable and dependent upon the precise location and situation of the proposed development and/or provision looking to be provided. This will also be subject to change over time as the market value of land alters. For this reason, land costs will need to be negotiated on a case-by-case basis.

An indicative approach to how contributions to land costs should be calculated is set out below.

*Indicative example approach:*

As an example, the Government provides some estimates for the value of land across the country in its document 'Land value estimates for policy appraisal 2017'<sup>19</sup>. This cites typical residential land as being £3,550,000 per hectares (or 10,000 square metres) in Arun.

*Table A3.3: Government estimates to land value*

<b>Land Category</b>	<b>Land Value (£)</b>
Residential	3,550,000
Industrial	Not provided
Office	Not provided
Agricultural	22,500 (South East region)

An average four court size sports hall is cited as being circa 1,532 square metres<sup>20</sup>.

On this basis, 1 square metre of residential land is calculated to be £355 (e.g. 3,550,000 / 10,000 = £355).

Consequently, the land needed to accommodate a sports hall is estimated to cost £543,860 (e.g. 355 x 1,532 = £543,860).

It is important to recognise this is only an indicative example of how an approach to calculating the costs of the land needing to be secured in order to accommodate new leisure provision could be calculated. In such situations, land costs will be negotiated on a case-by-case basis to reflect the variables in terms of location, position and market values.

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<sup>19</sup> <https://www.gov.uk/government/publications/land-value-estimates-for-policy-appraisal-2017>

<sup>20</sup> Sport England Cost Guidance 2018 <https://www.sportengland.org/facilities-planning/design-and-cost-guidance/cost-guidance/>

**APPENDIX FOUR: SUSTAINABLE URBAN DRAINAGE SYSTEMS AND GREEN INFRASTRUCTURE GUIDANCE**

**Sustainable Urban Drainage Systems (SUDS)**

The implementation of SUDS should be incorporated within each development masterplan as a fully designed solution which responds to specific site characteristics and embraces the opportunities available. It must not be a way to dispose of or store unwanted run-off.

It is essential that SUDS do not impact on the usable levels of public open space also required as part of new housing developments. SUDS whilst providing benefit in the correct capacity within development, should not be included in the ‘usable open space calculations’

Publications from other authorities and organisations provide guidance and models in the application of SUDS which should be referred to as good practice:

- ◀ WWT & RSPB: Sustainable drainage systems – Maximising the potential for people and wildlife. A guide for local authorities and developers<sup>21</sup>

The guidance states that “SUDS provide the ideal opportunity to bring urban wetlands and other wildlife-friendly green spaces into our towns and cities and link these with existing habitats creating blue and green corridors. Well-designed SUDS should also be an amenity and education resource for the community, providing high-quality public green space in which to relax, play and enjoy wildlife.” The publication also goes on to state that most SUDS are failing to achieve this potential. If done properly, they can deliver benefits for the whole community in terms of biodiversity, climate regulation, regeneration, learning, health, recreation and play.

- ◀ Sustainable Drainage – Cambridge Design and Adoption Guide<sup>22</sup>

The Cambridge guide provides detailed guidance on the design and adoption of a range of SUDS. It summarises the four key principles for these as:

*Table A4.1: Key principles of SUDS*

<b>Performance</b>	<b>High Quality Design</b>	<b>Integrated Approach to Health &amp; Safety</b>	<b>Ease of Maintenance</b>
Reduce flood risk	Micro managed bespoke design	Easily identifiable features and risk	Simple, surface features
Improve water quality	Integration with wider landscape setting	Shallow gradients	Minimise use of grills and other engineered features
Delivering biodiversity benefits	Use of robust, low impact materials	Planting and design used to create barrier where necessary	Shallow gradients
Provide amenity for residents	Designed to be attractive all year round		Robust appropriate planting for ease of maintenance but not at expense of biodiversity (unless erosion prevention is a priority)

<sup>21</sup> [http://www.wwt.org.uk/uploads/documents/1400927422\\_SustainableDrainageSystemsGuide.pdf](http://www.wwt.org.uk/uploads/documents/1400927422_SustainableDrainageSystemsGuide.pdf)

<sup>22</sup> <https://www.cambridge.gov.uk/sustainable-drainage-systems-suds>

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In addition to the information contained within the guidance above Arun District Council requires that SUDS within developments should be designed to:

- ◀ A high quality and be beneficial to people and wildlife. Priority shall be given to the needs of people for recreation and enhancing biodiversity and the spaces created must work for both.
- ◀ Incorporate a diverse range of SUDS solutions.
- ◀ Allow for sufficient open space outside the damp zone. The damp zone can be used for informal activity space but this must not be the only allocation.

The Landscape Institute have published a review on the delivery, design, adoption and maintenance of SUDS<sup>23</sup>. This highlights the inconsistencies in the delivery of SUDS across the country whilst stressing the need for appropriate SUDS to safeguard local environments.

#### **Green Infrastructure (GI)**

Green Infrastructure (GI) serves an important role in the provision of new public open space in providing solutions which address the social, environmental and economic challenges facing today's society. New development should seek to incorporate a range of GI assets to maximise the opportunities and benefits each of these offer. A masterplan should be used to illustrate the relationship between the GI assets and their functions within the development. It is expected that developments should aim to provide:

- ◀ Resilient water management
- ◀ Opportunities for recreation, health and wellbeing
- ◀ Enhanced biodiversity
- ◀ Mitigation for climate change
- ◀ Economic growth and investment
- ◀ Stronger communities
- ◀ Sense of place

The Landscape Institute Position Statement 2013 gives further detail on the implementation of GI<sup>24</sup>.

The Arun Green Infrastructure Study (2012) should also be referred to for further guidance. It details future needs in relation to growth areas as well as opportunities and priority projects.

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<sup>23</sup> [Landscape Institute - SUDS Delivery Review Jan 2019](#)

<sup>24</sup> [Landscape Institute - Green Infrastructure Position Statement 2013](#)



**APPENDIX FIVE: MINIMUM SITE SIZES**

**Open space and play**

Fields in Trust (FIT) offer some guidance to the potential minimum threshold size of different types of play provision.

*Table A5.1: Minimum site size - play*

<b>Classification</b>	<b>Minimum size of site (hectares)</b>
LAP	0.01
LEAP	0.04
NEAP	0.10
Other outdoor provision (i.e. MUGA, skate park)	0.10

New play provision should look to be provided as offsite contributions if the calculated open space requirement for the proposed development falls below the size thresholds. If the requirement is above the thresholds, it should look to be provided onsite as part of the development.

On this basis and based on an occupancy rate of 2.2 people per dwelling, a development with 8 dwellings would have an equivalent population of 18.

The requirement for play provision can be calculated by using the calculator provided which is based on the following calculation:

*Quantity guideline standard x associated population / 1000 = open space requirement*

Or

**$0.55 \times 18 / 1000 = 0.01 \text{ hectares}$**

Consequently, an additional population of 18 people, would generate a requirement of 0.01 hectares of play space.

This therefore meets the minimum site size threshold for play provision to a LAP classification. On this basis, the table below details the points at which the other play classifications are 'triggered' by different scales of development.

*Table A5.2: Play requirement by scale of development*

<b>Classification</b>	<b>Minimum size of site (hectares)</b>	<b>On site provision required at 'X' No' of dwellings</b>
LAP	0.01	8
LEAP	0.04	33
NEAP	0.10	83
Other outdoor provision (i.e. MUGA, skate park)	0.10	83

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On this basis, Part 4 of the SPD sets out that any development below eight dwellings does not require to contribute to play provision.

For open space provision, the Greater London Authority (GLA) offers some guidance to the minimum size of sites<sup>25</sup>. This has been used as a basis to set the following minimum site sizes for different open space.

*Table A5.3: Minimum site size – open space*

Classification	Minimum size of site (hectares)
Amenity greenspace	0.1
Natural and semi natural	0.4
Allotments	0.4 (0.025 per plot)
Parks and gardens	1.0

On this basis and based on an occupancy rate of 2.2 people per dwelling, a development with 15 dwellings would have an equivalent population of 33.

The requirement for open space provision can be calculated by using the calculator provided which is based on the following calculation:

**Quantity guideline standard x associated population / 1000 = open space requirement**

Or

$$3.20 \times 33 / 1000 = 0.10 \text{ hectares}$$

Consequently, an additional population of 33 people, would generate a requirement of 0.10 hectares of public open space.

This therefore meets the minimum site size threshold for public open space provision (Table A5.3). For this scale development it is recommended that the public open space provision is in the form of amenity greenspace. On this basis, the table below details the points at which the other open space classifications may be 'triggered' by different scales of development.

*Table A5.4: Open space requirement by scale of development*

Classification	Minimum size of site (hectares)	On site provision required at 'X' No' of dwellings
Amenity greenspace	0.1	15
Natural and semi natural	0.4	57
Allotments	0.4 (0.025 per plot)	727
Parks and gardens	2.0	1,134

On this basis, Part 4 of the SPD sets out that any development of 15 dwellings or greater is required to contribute to open space provision.

<sup>25</sup> GLA Open space strategies: Best practice guidance (2009)

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

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Developments of between 10-14 dwellings will require a financial contribution.

Developments below 10 dwellings do not require to contribute to open space provision.

### **Playing pitches**

There are no prescribed minimum site sizes for playing pitches. However, for obvious reasons the creation of any pitch provision less than a whole pitch is not practical. The need for pitch provision is calculated by levels of demand.

Demand equating to the need for a new pitch can be translated as follows:

- ◀ For football and rugby demand, one match equivalent session per week is needed to represent demand for one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For hockey, demand for four match equivalent sessions per week is needed to represent demand for one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For cricket, demand for 60 match equivalent sessions per season is needed to represent demand one actual pitch (based on teams playing at peak time on a home and away basis).
- ◀ For 3G pitches, the PPS identifies demand for four full size 3G pitches (two based on current demand and two based on future demand).

Furthermore, best practice advises to avoid provision of inappropriate facilities such as standalone single pitch sites. As these are less likely to be used and are more likely to fall into disrepair.

Once the demand from new developments is quantified, Sport England advocates evaluation on whether existing provision within an appropriate distance of the development is able to meet the additional need (i.e. can the capacity at an existing site be enhanced).

### **Indoor and built facilities**

There are no prescribed minimum site sizes for indoor and built facilities. However, for obvious reasons the creation of any provision less than recommended design dimensions is not practical.

However, there is still a need for contributions to be sought as the demand generated from new populations (as a result of housing growth) in turn puts additional pressure on the existing infrastructure. Therefore, if no new provision is planned this additional demand has nowhere to go. The Indoor Sport and Built Facilities Strategy identified that 'sports halls are operating near to capacity, offering little scope to expand, meaning that future demand will have to be accommodated at new facilities'.

It also stated that 'pools are generally only servicing Arun residents with almost 95% of currently used capacity from within Arun. However, 18% of demand is exported to other local authorities, suggesting there is insufficient capacity within Arun to satisfy all of the demand.'

**APPENDIX SIX: WORKED EXAMPLES**

The following examples demonstrate how onsite provision and financial contributions to offsite provision including commuted sums towards maintenance of provision (where applicable) is derived.

Calculations are based on the number of dwellings for a given development. Three worked examples are set out including a smaller scale development of 12 dwellings, a development of 90 dwellings and a larger scale development of 1,500 dwellings.

It is important to consider that offsite contributions for non-strategic sites will be via CIL once adopted. As a result, the relevant Council department teams will need to bid for CIL money towards a specific requirement to be funded.

**Example 1: Development of 12 dwellings**

**Open space**

<b>OS Step 1</b>	<b>Calculate population generated by housing development</b>
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*Number of dwellings (12) x household occupancy rate (2.2)<sup>26</sup> = associated population (26.4)*

<b>OS Step 2</b>	<b>Calculate open space requirement generated by housing development</b>
------------------	--

Using the Open Space Calculator, the following requirements are identified: *26.4 x 5,500 play standard = 145,200 sqm /1,000 = 145 sqm.*

*Table A6.1: Open space requirements*

Requirement (Square Metres)		
Public Open Space	Allotments	Play
0	0	145

No onsite requirement of public open space or allotment provisions is required, as the minimum size thresholds are not met for a development of 12 dwellings (page 13 Table 4.1.2).

<b>OS Step 3</b>	<b>Determine if provision should be on site or off site?</b>
------------------	--

Whether provision should be made onsite or via an offsite financial contribution is dependent on the size of the development. Based on the triggers set out in Table 4.1.2 the following requirements are needed:

*Onsite requirement:*

◀ 145 square metres of play space (alternatively a financial offsite contribution of £20,764). *i.e. 12 dwellings x £1,730 per dwelling = £20,764*

<sup>26</sup> Local occupancy rate of 2.2 persons per household (2018)

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Offsite site financial requirement:

- ◀ Public Open Space equivalent = £23,654 (i.e. 12 dwellings x £1,971 = £23,654)
- ◀ Allotment equivalent = £231 (i.e. 26.4 population x £19.25 per dwelling = £231 and because this is below the minimum contribution threshold £1,000 will be sought)
- ◀ Play space equivalent = £20,764 (if onsite requirement not deemed appropriate)

Financial contribution for maintenance:

- ◀ Play space = £30,000

On this basis, the following commuted sum is calculated:

Table A6.2: Summary of open space/play requirement

<b>Onsite requirement</b>	
Public open space	n/a
Allotment	n/a
Play space	145 Sq M (if to be provided onsite)
<b>Offsite financial requirement</b>	
Public open space	£23,654
Allotment	£231
Play space	£20,764 (if to be provided as offsite financial contribution)
<b>Maintenance<sup>27</sup></b>	
Public open space	n/a
Play space	£30,000
<b>Total</b>	<b>£74,649</b>

This is on the basis that the contribution for play space is deemed to be best provided as an offsite financial contribution.

If the play requirement is deemed to be best provided as an onsite contribution, the commuted sum will be £53,885 plus 145 square metres of onsite play provision.

### Playing pitches

<b>PP Step 1</b>	<b>Determine the playing pitch requirement resulting from the development</b>
------------------	---

The main tool for determining this is the PPS New Development Calculator which is a Sport England tool provided on completion of the Playing Pitch Strategy. This calculates the following estimated demand:

<sup>27</sup> This is a high gross maintenance cost; determining the developer financial contributions will be based on a net additional maintenance cost to be determined by the Local Authority.

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Table A6.3: Estimated pitch demand

Pitch Sport	Estimated demand by sport
Adult football	0.01 match equivalent sessions per week
Youth football	0.01 match equivalent sessions per week
Mini soccer	0.00 match equivalent sessions per week
Rugby union	0.00 match equivalent sessions per week
Rugby league	0.00 match equivalent sessions per week
Hockey	0.00 match equivalent sessions per week
Cricket	0.00 match equivalent sessions per season
<b>Capital cost = £2,530</b>	
<b>Life cycle cost (per annum) = £447</b>	
<b>Life cycle cost (for 20-year period) = £8,940</b>	

<b>PP Step 2</b>	<b>Determine whether new provision is required and whether this should be on or off site</b>
------------------	--

On this basis, the demand generated by the development does not result in the requirement for onsite provision to be created (i.e. a single whole pitch is not estimated).

Consequently, the capital cost of £2,530 and commuted lifecycle cost of £8,940 are to be sought. This is a total commuted sum of £11,470.

As no onsite provision is calculated, only Step 5 is applicable.

<b>PP Step 5</b>	<b>Calculate the financial contribution required</b>
------------------	--

The Playing Pitch New Development Calculator presents an estimate of the associated costs for providing the equivalent of new pitches. It also provides a figure to the lifecycle costs for new or enhanced provision.

As detailed above, the capital cost of £2,530 and commuted lifecycle cost of £8,940 are to be sought. This is a total commuted sum of £11,470.

### **Indoor and built sports facilities**

<b>BSF Step 1</b>	<b>Determine the key indoor and built sport facility requirement resulting from the development</b>
-------------------	---

Using the Sports Facility Calculator (SFC), the following requirements are identified for a development of 12 dwellings:

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Table A6.4: Sports Facility Calculator summary

Sports hall		Swimming pool		Artificial Grass Pitches	
-	-	Square meters	0.26		
Courts	0.01	Lanes	0.00		
Halls	0.00	Pools	0.00	Pitches	0.00
Vpwpp <sup>28</sup>	1	Vpwpp	2	Vpwpp	0
Cost	£4,669	Cost	£5,027	Cost (if 3G)	£687

<b>BSF Step 2</b>	<b>Determine the other indoor sports and community facilities required as a result of the development</b>
-------------------	---

Based on the calculation set out in Table 4.3.1 the following requirements are needed in relation to health and fitness provision:

Table A6.5: Health and Fitness requirement

<b>2a</b>	<b>Estimated new population to use H&amp;F</b> = New population generated (26.4) x National penetration rate for H&F of 14% (New population generated x 0.14) = 4
<b>2b</b>	<b>Pieces of equipment required</b> = Estimated new population to use H&F (4) / National average number of users (25) per equipment piece = 0.16
<b>2c</b>	<b>Space required to accommodate equipment</b> = Pieces of equipment required (0.16) x Average square metres (5) per equipment piece = 0.80
<b>2d</b>	<b>Financial contribution required</b> = Space required to accommodate equipment (0.80) x Estimated build and equipment cost per square metre (£2,000) = £1,600

<b>BSF Step 3</b>	<b>Demonstrate an understanding of what else the development generates demand for</b>
-------------------	---

Step 3 is only applicable to sites of a large size which may generate demand for other infrastructure needs such as health centres, libraries etc. Consideration to the location and opportunity for co-locating such forms of provision should be given where appropriate.

<b>BSF Step 4</b>	<b>Financial contributions to deliver strategic provision</b>
-------------------	---

Based on calculations for Step 1 and Step 2, the following financial contribution is required:

Table A6.6: indoor and built sports facility financial contributions

BSF Step 1 financial requirement	
Sports hall	£4,669
Swimming pools	£5,027
Artificial Grass Pitches (if 3G)	£687
BSF Step 2 financial requirement	
Health and fitness	£1,600
<b>Total</b>	<b>£11,983</b>

<sup>28</sup> Visits per person per week

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

### Summary

On the assumption that all open space requirements will be provided as offsite financial contributions, the following total commuted sum is required:

Table A6.7: Summary of contributions

Total offsite financial contribution	
Public open space and play	£74,649
Playing pitches	£11,470
Indoor and built sports facilities	£11,983
<b>Total</b>	<b>£98,102</b>

If the play requirement element is deemed to be best provided as an onsite contribution, the total commuted sum will be £77,388 plus 145 square metres of onsite play provision.

For developments requiring offsite contributions to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision, developers will also be required to agree and pay towards the land costs needing to be secured. This will be negotiated on a case-by-case basis due to the variation in locations, land costs and market values. For examples of land value costs please see Appendix 3.

### Example 2: Development of 90 dwellings

#### Open space

<b>OS Step 1</b>	<b>Calculate population generated by housing development</b>
------------------	--

*Number of dwellings (90) x household occupancy rate (2.2)<sup>29</sup> = associated population (198)*

<b>OS Step 2</b>	<b>Calculate open space requirement generated by housing development</b>
------------------	--

Using the Open Space Calculator, the following requirements are identified:

Table A6.8: Open space requirements

Requirement (Square Metres)		
Public Open Space	Allotments	Play
6,336	0	1,089

No onsite requirement of allotment provision is required, as the minimum size threshold is not met for a development of 90 dwellings (Table 4.1.2).

<sup>29</sup> Local occupancy rate of 2.2 persons per household (2018)



## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

### OS Step 3 Determine if provision should be on site or off site?

Whether provision should be made onsite or via an offsite financial contribution is dependent on the size of the development. Based on the triggers set out in Table 4.1.2 the following requirements are needed:

#### Onsite requirement:

- ◀ 6,336 square metres of public open space
- ◀ 1,089 square metres of play space (equivalent to a NEAP or other configuration as appropriate)

#### Offsite site financial requirement:

- ◀ Allotment equivalent = £1,733

#### Financial contribution for maintenance:

- ◀ Public Open Space = £106,951.68
- ◀ Play space = £30,000

On this basis, the following commuted sum is calculated:

Table A6.9: Summary of open space/play requirement

<b>Onsite requirement</b>	
Public open space	6,336 Sq M
Allotment	n/a
Play space	1,089 Sq M
<b>Offsite financial requirement</b>	
Public open space	n/a
Allotment	£1,733
Play space	n/a
<b>Maintenance<sup>30</sup></b>	
Public open space	£106,951.85
Play space	£30,000
<b>Total</b>	<b>£138,684.85</b>

#### Playing pitches

### PP Step 1 Determine the playing pitch requirement resulting from the development

The main tool for determining this is the PPS New Development Calculator which is a Sport England tool provided on completion of the Playing Pitch Strategy.

<sup>30</sup> This is a high gross maintenance cost; determining the developer financial contributions will be based on a net additional maintenance cost to be determined by the Local Authority.

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

This calculates the following estimated demand:

*Table A6.10: Estimated pitch demand*

Pitch Sport	Estimated demand by sport
Adult football	0.04 match equivalent sessions per week
Youth football	0.04 match equivalent sessions per week
Mini soccer	0.02 match equivalent sessions per week
Rugby union	0.02 match equivalent sessions per week
Rugby league	0.00 match equivalent sessions per week
Hockey	0.00 match equivalent sessions per week
Cricket	0.02 match equivalent sessions per season
<b>Capital cost = £19,266</b>	
<b>Life cycle cost (per annum) = £3,407</b>	
<b>Life cycle cost (for 20-year period) = £68,140</b>	

<b>PP Step 2</b>	<b><i>Determine whether new provision is required and whether this should be on or off site</i></b>
------------------	---

On this basis, the demand generated by the development does not result in the requirement for onsite provision to be created (i.e. a single whole pitch is not estimated).

Consequently, the capital cost of £19,266 and commuted lifecycle cost of £68,140 are to be sought. This is a total commuted sum of £87,406.

As no onsite provision is calculated, only Step 5 is applicable.

<b>PP Step 5</b>	<b><i>Calculate the financial contribution required</i></b>
------------------	---

The Playing Pitch New Development Calculator presents an estimate of the associated costs for providing the equivalent of new pitches. It also provides a figure to the lifecycle costs for new or enhanced provision.

As detailed above, the capital cost of £19,266 and commuted lifecycle cost of £68,140 are to be sought. This is a total commuted sum of **£87,406**.

### ***Indoor and built sports facilities***

<b>BSF Step 1</b>	<b><i>Determine the key indoor and built sport facility requirement resulting from the development</i></b>
-------------------	--

Using the Sports Facility Calculator (SFC), the following requirements are identified for a development of 90 dwellings:

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Table A6.11: Sports Facility Calculator summary

Sports hall		Swimming pool		Artificial Grass Pitches	
-	-	Square meters	1.96		
Courts	0.05	Lanes	0.04		
Halls	0.01	Pools	0.01	Pitches	0.00
Vpwpp	11	Vpwpp	12	Vpwpp	4
Cost	£35,555	Cost	£38,285	Cost (if 3G)	£5,232

<b>BSF Step 2</b>	<b>Determine the other indoor sports and community facilities required as a result of the development</b>
-------------------	---

Based on the calculation set out in Table 4.3.1 the following requirements are needed in relation to health and fitness provision:

Table A6.12: Health and Fitness requirement

<b>2a</b>	<b>Estimated new population to use H&amp;F</b> = New population generated (198) x National penetration rate for H&F of 14% (New population generated x 0.14) = 28
<b>2b</b>	<b>Pieces of equipment required</b> = Estimated new population to use H&F (28) / National average number of users (25) per equipment piece = 1.12
<b>2c</b>	<b>Space required to accommodate equipment</b> = Pieces of equipment required (1.12) x Average square metres (5) per equipment piece = 5.60
<b>2d</b>	<b>Financial contribution required</b> = Space required to accommodate equipment (5.60) x Estimated build and equipment cost per square metre (£2,000) = £11,200

<b>BSF Step 3</b>	<b>Demonstrate an understanding of what else the development generates demand for</b>
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Step 3 is only applicable to sites of a large size which may generate demand for other infrastructure needs such as health centres, libraries etc. Consideration to the location and opportunity for co-locating such forms of provision should be given where appropriate.

<b>BSF Step 4</b>	<b>Financial contributions to deliver strategic provision</b>
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Based on calculations for Step 1 and Step 2, the following financial contribution is required:

Table A6.13: Indoor and built sports facility financial contributions

Step 1 financial requirement	
Sports hall	£35,555
Swimming pools	£38,285
Artificial Grass Pitches (if 3G)	£5,232
Step 2 financial requirement	
Health and fitness	£11,200
<b>Total</b>	<b>£90,272</b>

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

### Summary

The following total commuted sum is required:

Table A6.14: Summary of contributions

Total offsite financial contribution	
Public open space and play	£138,684.85
Playing pitches	£87,406
Indoor and built sports facilities	£90,272
<b>Total</b>	<b>£316,362.85</b>

In addition to the commuted sum for offsite financial contributions there is also a requirement for onsite provision of public open space (6,336 square metres) and play provision (1,089 square metres).

For developments requiring offsite contributions to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision, developers will also be required to agree and pay towards the land costs needing to be secured. This will be negotiated on a case-by-case basis due to the variation in locations, land costs and market values. For examples of land value costs please see Appendix 3.

### Example 3: Development of 1,500 dwellings

#### Open space

<b>OS Step 1</b>	<b>Calculate population generated by housing development</b>
------------------	--

$$\text{Number of dwellings (1,500)} \times \text{household occupancy rate (2.2)}^{31} = \text{associated population (3,300)}$$

<b>OS Step 2</b>	<b>Calculate open space requirement generated by housing development</b>
------------------	--

Using the Open Space Calculator, the following requirements are identified:

Table A6.15: Open space requirements

Requirement (Square Metres)		
Public Open Space	Allotments	Play
105,600	8,250	18,150

<b>OS Step 3</b>	<b>Determine if provision should be on site or off site?</b>
------------------	--

Whether provision should be made onsite or via an offsite financial contribution is dependent on the size of the development. Based on the triggers set out in Table 4.1.2 the following requirements are needed:

<sup>31</sup> Local occupancy rate of 2.2 persons per household (2018)

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

*Onsite requirement:*

- ◀ 105,600 square metres of public open space
- ◀ 18,150 square metres of play space
- ◀ 8,250 square metres of allotments

*Financial contribution for maintenance:*

- ◀ Public Open Space = £1,185,888.00
- ◀ Play space = £30,000

On this basis, the following commuted sum is calculated:

*Table A6.16: Summary of open space/play requirement*

<b>Onsite requirement</b>	
Public open space	105,600 Sq M
Allotment	8,250 Sq M
Play space	18,150 Sq M
<b>Offsite financial requirement</b>	
Public open space	n/a
Allotment	n/a
Play space	n/a
<b>Maintenance<sup>32</sup></b>	
Public open space	£1,185,888
Play space	£30,000
<b>Total</b>	<b>£1,215,888</b>

### ***Playing pitches***

<b>PP Step 1</b>	<b><i>Determine the playing pitch requirement resulting from the development</i></b>
------------------	--

The main tool for determining this is the PPS New Development Calculator which is a Sport England tool provided on completion of the Playing Pitch Strategy.

This calculates the following estimated demand:

<sup>32</sup> This is a high gross maintenance cost; determining the developer financial contributions will be based on a net additional maintenance cost to be determined by the Local Authority.

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Table A6.17: Estimated pitch demand

Pitch Sport	Estimated demand by sport
Adult football	0.61 match equivalent sessions per week
Youth football	0.60 match equivalent sessions per week
Mini soccer	0.39 match equivalent sessions per week
Rugby union	0.34 match equivalent sessions per week
Rugby league	0.00 match equivalent sessions per week
Hockey	0.02 match equivalent sessions per week
Cricket	0.39 match equivalent sessions per season
<b>Capital cost = £321,108</b>	
<b>Life cycle cost (per annum) = £56,789</b>	
<b>Life cycle cost (for 20-year period) = £1,135,780</b>	

<b>PP Step 2</b>	<b>Determine whether new provision is required and whether this should be on or off site</b>
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On this basis, the demand generated by the development does not result in the requirement for onsite provision to be created (i.e. a single whole pitch is not estimated). Consequently, the capital cost of £321,108 and commuted lifecycle cost of £1,135,780 are to be sought. This is a total commuted sum of £1,456,888.

As no onsite provision is calculated, only Step 5 is applicable.

<b>PP Step 5</b>	<b>Calculate the financial contribution required</b>
------------------	--

The Playing Pitch New Development Calculator presents an estimate of the associated costs for providing the equivalent of new pitches. It also provides a figure to the lifecycle costs for new or enhanced provision.

As detailed above, the capital cost of £321,108 and commuted lifecycle cost of £1,135,780 are to be sought. This is a total commuted sum of **£1,456,888**.

### **Indoor and built sports facilities**

<b>BSF Step 1</b>	<b>Determine the key indoor and built sport facility requirement resulting from the development</b>
-------------------	---

Using the Sports Facility Calculator (SFC), the following requirements are identified for a development of 1,500 dwellings:

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

Table A6.18: Sports Facility Calculator summary

Sports hall		Swimming pool		Artificial Grass Pitches	
-	-	Square meters	32.61		
Courts	0.87	Lanes	0.61		
Halls	0.22	Pools	0.15	Pitches	0.08
Vpwpp	190	Vpwpp	196	Vpwpp	59
Cost	£592,586	Cost	£638,089	Cost (if 3G)	£87,199

<b>BSF Step 2</b>	<b>Determine the other indoor sports and community facilities required as a result of the development</b>
-------------------	---

Based on the calculation set out in Table 4.3.1 the following requirements are needed in relation to health and fitness provision:

Table A6.19: Health and Fitness requirement

<b>2a</b>	<b>Estimated new population to use H&amp;F</b> = New population generated (3,300) x National penetration rate for H&F of 14% (New population generated x 0.14) = <b>462</b>
<b>2b</b>	<b>Pieces of equipment required</b> = Estimated new population to use H&F (462) / National average number of users (25) per equipment piece = <b>18.48</b>
<b>2c</b>	<b>Space required to accommodate equipment</b> = Pieces of equipment required (18.48) x Average square metres (5) per equipment piece = <b>92.40</b>
<b>2d</b>	<b>Financial contribution required</b> = Space required to accommodate equipment (92.40) x Estimated build and equipment cost per square metre (£2,000) = <b>£184,800</b>

<b>BSF Step 3</b>	<b>Demonstrate an understanding of what else the development generates demand for</b>
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Step 3 is only applicable to sites of a large size which may generate demand for other infrastructure needs such as health centres, libraries etc. Consideration to the location and opportunity for co-locating such forms of provision should be given where appropriate.

<b>BSF Step 4</b>	<b>Financial contributions to deliver strategic provision</b>
-------------------	---

Based on calculations for Step 1 and Step 2, the following financial contribution is required:

Table A6.20: Indoor and built sports facility financial contributions

Step 1 financial requirement	
Sports hall	£592,586
Swimming pools	£638,089
Artificial Grass Pitches (if 3G)	£87,199
Step 2 financial requirement	
Health and fitness	£184,800
<b>Total</b>	<b>£1,502,674</b>

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

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### **Summary**

The following total commuted sum is required:

*Table A6.21: Summary of contributions*

<b>Total offsite financial contribution</b>	
Public open space and play	£1,215,888
Playing pitches	£1,456,888
Indoor and built sports facilities	£1,502,674
<b>Total</b>	<b>£4,175,450</b>

In addition to the commuted sum for offsite financial contributions there is also a requirement for onsite provision of public open space (105,600 square metres), allotment (8,250 square metres) and play provision (18,150 square metres).

For developments requiring offsite contributions to new forms of provision such as hub sites, a new leisure centre and/or other appropriate provision, developers will also be required to agree and pay towards the land costs needing to be secured. This will be negotiated on a case-by-case basis due to the variation in locations, land costs and market values. For examples of land value costs please see Appendix 3.



**APPENDIX SEVEN: BERSTED PARK DEVELOPMENT MODEL EXAMPLE**

The Bersted Park housing development is recognised by ADC as a development with a good quality design and levels of provision. It is considered by the Local Authority as a model example and should act as an aspiration for future developments of a similar scale and nature.

The Bersted Park site, which comprises 700 houses, provides a variety of formal and informal open spaces and community facilities in and around the housing. It is a model which the Council would encourage future developers to aspire to (i.e. delivering development sites that offer residents the opportunity to live within a similar setting that provides for the new community it serves as well as linking with existing communities, open spaces and facilities).

The Bersted Park site includes the following key features to be considered as a model for developers to aspire to:

- ◀ Overall good site design which encompasses pathways and cycle links within and beyond the development site with connectivity to the wider existing community. Good integration of open spaces with housing, the school, the community building and other on-site provision.
- ◀ The provision of private and public open space in a variety of typology including playing fields, recreational open spaces, parkland, play areas, youth provision (MUGA and skate park), water features, fitness and arts trails. (See below for more information).
- ◀ A community building to serve the development provided by the developer as part of the S106 Agreement. The building has car parking and an associated MUGA, skate park and children's play area and offers a great facility for the new population within the housing development as well as other local residents.
- ◀ A Primary school provided within the development and alongside the Village Green.
- ◀ Formal sports pitch provision consisting of 3 football pitches and 1 cricket pitch and a Trim Trail close to the school and Village Green.
- ◀ A development that contributes towards the provision of additional green infrastructure whilst protecting and enhancing the existing.
- ◀ The addition of new tree and shrub planting to soften the development, enhancing and improving the area.
- ◀ SuDS have been developed not only to aid drainage but to encourage habitat formation as well as providing an attractive amenity for the local community. The lake within the development site is a key water feature where wildlife flourishes and people can take walks and interact with the artwork trail. (see below).
- ◀ The development contributes to improving the health and well-being of the local community with a number of open spaces that encourage walking, formal and informal activity and sports.
- ◀ The site contributes ecology and biodiversity benefits having created additional habitat and habitat networks allowing for the retention of trees and woodland, landscape features and hedges.

## ARUN SUPPLEMENTARY PLANNING DOCUMENT OPEN SPACE, PLAYING PITCHES, INDOOR AND BUILT SPORTS FACILITIES

- ◀ Inclusion of public art via a S106 funded art trail which encourages people into the open spaces within the development. Pieces are themed around the space they are in (e.g. the historic piece represents the remains of a Roman soldier found under the site of the community building) and/or allow people to sit or climb on the pieces (the sofa and the dragon fly benches and the tractor with hay bales and sports piece). Please click on the following link for the art trail leaflet  
<https://www.arun.gov.uk/download.cfm?doc=docm93ijjm4n10785.pdf&ver=10744>
- ◀ The new development has secured a management and maintenance strategy which ensures the establishment of the green areas followed by a detailed management arrangement in place where the District Council adopts and maintains these as public areas open to all.
- ◀ Additional items included within the development include bins and seating, signage and interpretation/wayfinding.

The total site area is 67.7 ha with the following provision on site:

Description	Area (m <sup>2</sup> )
Village Green	9,400
Bersted Lake	8,950
Road bunds	19,150
Sports Pitches	55,750
Informal public open space	183,900
Landscape buffer	61,300
<b>Total</b>	<b>329,450 (32.9 ha)</b>

Other infrastructure details include:

Description	Quantity
Community building	1
Community building car park	49 spaces including 6 disabled + 2 coach
LEAPs	3
NEAPs	2
MUGA	1
Skate Park	1
Homes on site	700

The development included a significant level of involvement at the master planning stage to make it a success. This approach should aim to be replicated to ensure the success of other large-scale developments.

:

## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 27 FEBRUARY 2019

#### PART A : REPORT

**SUBJECT: Authority Monitoring Report 2017/18**

**REPORT AUTHOR:** Kevin Owen (Team Leader Planning Policy & Conservation)

**DATE:** 23 May 2019

**EXTN:** 37853

**PORTFOLIO AREA:** Planning

**EXECUTIVE SUMMARY:** This report presents the Arun Local Planning Authority's Monitoring Report 2017/18. The full report is provided as Background Paper 1 (to be published on the Council's web site following this meeting – 19 June 2019). As part of the AMR the 5 year housing land supply has been updated and this shows currently, there is a 4.7 year supply.

This has policy and decision making implications which under national policy, provides that the 'presumption in favour of sustainable development will apply to planning applications until the achievement of a 5 year housing land supply is attained.

#### **RECOMMENDATIONS:**

That the Local Plan Sub Committee:

1. Notes the Authority Monitoring Report 2017/18.

## 1. BACKGROUND:

- 1.1. The preparation of an Authorities Monitoring Report (AMR) is a requirement under Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The survey, data collection, validation process and lead time to establish the monitoring report outputs, means that data is presented for the previous monitoring year at publication. The AMR is updated on an annual basis. The current AMR 2018 therefore, covers the financial year 1st April 2017-31st March 2018.
- 1.2. The AMR monitors progress on; plan making (i.e. Development Plan Documents) identified within the local planning authority's Local Development Scheme; and comments on the use of planning policies; and the updated annual housing land supply figures.
- 1.3. The AMR 2018 was drafted in December 2018 but publication was delayed pending Government consultations on components of housing supply to be set out within the revised National Planning Policy Framework (NPPF). The updated NPPF was published in February 2019. The AMR 2018 can now be published and includes a range of updates and progress reports, including the following:-
  - Progress on the Local Plan and Development Plan Documents against the timetable set out in the Arun Local Development Scheme 2016/17
  - Neighbourhood Plan Update
  - Duty to Cooperate Update
  - 5 year Housing Land Supply
  - Local Plan Policy Usage
  - Housing Delivery
  - Commercial Land Delivery
  - Traveller Sites
  - Sussex Biodiversity Annual Monitoring Report
- 1.4. The AMR 2018 will be accessed via the Council's web pages as soon as practicable after the meeting (i.e. Background Paper 1). In particular, the AMR includes a 5 year Housing Land Supply Report, an update on Local Plan and Neighbourhood Plan progress and housing delivery. In particular, it should be noted that:-
  - with the adoption of the Arun Local Plan Arun (July 2018) Arun had a 5.3 year housing land supply (based on monitoring in 2016/17)
  - however, since adoption, monitoring for the period 2017/18 shows delivery rates and housing trajectories for sites has not progressed as anticipated
  - consequently, there is a 4.7 year housing land supply for the period 2018-2023
  - the reasons for the lower projected delivery include; recent planning refusals on some Strategic Allocations; poor quality schemes delaying approvals; developers unable to meet stated and committed timescales; and developer/market factors outside of authority control.

- 1.5. The NPPF 2019 has introduced some sweeping changes on how authorities measure their Objectively Assessed Housing Need (OAN), measure past performance on housing delivery against their housing need or requirement, and calculate an adequate 5 year housing land supply looking forward:-
- Objectively Assessed Housing Need (OAN) is now calculated according to the government's Standard Housing Methodology (which establishes a baseline annualised 10 year projection, pro rata for any plan period, uplifted for a local affordability factor (i.e. if above 4 times the local average earnings to house prices ratio) but 'capped' at 40% where there is a recently adopted Local Plan (i.e. within the last 5 years);
  - Housing Delivery Test (HDT) – measures performance over the previous 3 years and is expressed as a percentage of the Local Plan housing target or 'local housing need' (OAN) divided by housing completions. The housing target must be within a Local Plan adopted within the last 5 years and may include a 'stepped housing trajectory' as in the case for Arun District). The HDT is the basis for calculating an authority's 'buffer' for calculating a 5 year housing land supply;
  - Calculating a 5 year housing land supply (5 YHLS) with emphasis on clearly evidenced 'specific deliverable sites' available in the right locations now that can be developed within 5 years.
- 1.6. The HDT test is an additional test to the 5 YHLS and the Council needs to demonstrate that both these tests are passed in order to ensure paragraph 11.d of the NPPF 2019 is not engaged (i.e. the 'presumption in favour of sustainable development' see appendix 1 where applications will have to be positively determined provided that they do not conflict with the policies of the NPPF or that adverse impacts significantly and demonstrably outweigh the benefits assessed against the NPPF as a whole ).
- 1.7. Arun's HDT result published for 2018 indicates 91% which triggers the requirement for an 'Action Plan' and a buffer requirement for 5 YHLS calculation purposes, of 5%. If the percentage had been below 85% a 20% buffer would be applied. Below 75% policies would be considered out of date triggering paragraph 11.d of the NPPF 2019.
- 1.8. The Action Plan will contain more evidence on why we are not meeting the requirement and come up with solutions to improve supply and housing completion projection rates. The solutions found as part of the Action Plan should help improve the 5 Year Housing Land Supply as well as the Housing Delivery Test Score. The Action Plan will need to be produced by end of August 2019.
- 1.9. Arun's 5 YHLS is calculated broadly consistent with the government's clarified definition of 'specific deliverable' sites being implemented within 5 years. However, the current level of documented evidence is not sufficiently robust until the next AMR is produced with additional documented evidence on the housing delivery trajectory for each site. In recognition of this Cabinet has approved resource for the recruitment of a senior planning officer to assist with the additional burden of work involved. In the interim, a review of the build out rates and projected delivery rates for strategic allocations has been undertaken.

- 1.10. The housing trajectory for sites has been adjusted to account for the refusal of the application at Paghram (which will push back delivery on the site) and delayed planning status of some housing sites within the other Strategic Allocations which have still not progressed to a submitted planning application or indeed not yet obtained planning approval. This also impacts on the 5 yr HLS and this has been adjusted accordingly. The consequence of this is that instead of a 5.3 year HLS Arun now has a 4.7 year HLS
- 1.11. Paragraph 13.4 of Chapter 4 of the AMR shows how the 4.7 year supply has been calculated based on the housing requirement against projected completions. Overall supply for the rolling 5 year period for calculating the 5 yr HLS has decreased from 6,762 (in 2017) to 5,911 (in 2018) because predicted completion rates have had to be pushed back a year or more on some sites, as explained above. The combined effect of Arun entering a higher housing requirement period on the Local Plan stepped housing trajectory with an increasing shortfall on actual delivery mean that the 5 year housing land supply has fallen.
- 1.12. There are a number of reasons why delivery timescales have slipped. In particular:
- The quality of major applications submitted have not all been of sufficient quality to allow timely approval;
  - Strategic site application P/6/17/OUT had officer recommendation for approval (for 300 dwellings) but was then subsequently refused at committee;
  - Applications were expected on most of the strategic allocations following the LP Examination in 2017 on the assurances and evidence provided by the key developers but for example, Bersted (SD3) and BEW (SD5) have not yet been received as previously promoted and these large yielding sites have had to be pushed back further out of the 5 year period;
  - Developers have not delivered on their previously promoted build out rates (this may be partly due to market issues and or infrastructure issues).
  - The actual rate of completions is highly dependent on the developers, which is largely out of Local Authority control.
- 1.13. The consequence of not having a 5 year HLS means that the authority has not satisfied one of the tests outlined in para 1.5 above. This will trigger paragraph 11.d of the NPPF 2019 and the application of the 'presumption' for DM decisions. It is also more likely that Arun will see speculative applications on sites that are less sustainable. Refusal is more likely to go to appeal and succeed – until a 5 year HLS is retained. The 3 year housing land supply position is 2.4 years. and any made Neighborhood Plans that are more than 2 years old and make housing allocations, will also be subject to the NPPF 2019 paragraph 11d 'presumption' (Planning Policy Guidance para 083).
- 1.14. Arrangements are being made to prioritise land supply monitoring work to ensure that the next AMR 2019 has a robust assessment of deliverable sites with the necessary additional evidence for establishing the 5 yr HLS. Much of the Government's new definition of 'deliverable sites' is already assessed by Arun's

monitoring approach however the evidence burden is greater to document deliverability under the new definition.

- 1.15. The Action plan is being produced and will involve engagement with developers to see whether there are known barriers to development and possible options to overcome them and accelerate planning applications.
- 1.16. Arun will also need to ensure that the Non-strategic Sites Development Plan Document progresses in order to boost potential net additional housing land supply to help maintain the 5 year HLS. This is required to be submitted for examination by July 2021.
- 1.17. Furthermore, paragraph 12.1.12 of the adopted Arun Local Plan 2018 sets out the monitoring regime for assessing progress on delivering the Local Plan housing requirement such that, should the AMR indicate that delivery is below the annualised requirement or projected completion rate (whichever is the lower) over two consecutive years, the Council will undertake a partial review of the Local Plan.
- 1.18. It should be noted that because the AMR monitoring period is retrospective, it largely monitors the previously adopted Local Plan 2003 policies under the Local Development Scheme adopted for 2017. However, there is an exception that the housing land supply and 5 year housing land supply is included within Chapter 4 for the adopted Local Plan 2018 plan period because there need to address national policy requirements and because the AMR 2018 covers a transition year. With the adoption of the Arun Local Plan 2018 the next AMR for 2019 will need to address the adopted policies of the Arun Local Plan 2018 and the LDS adopted in January 2019.

#### Next Steps

- 1.19. The AMR and HLS will be reported to June PPSC in order for the AMR and HLS to be published.

## **2. PROPOSAL(S):**

That the AMR be agreed as the monitoring evidence base for plan making and policy performance for the period 1<sup>st</sup> April 2017- 31<sup>st</sup> March 2018.

## **3. OPTIONS:**

3.1 The following options are available:-

- To publish the AMR and 5 year HLS update 2018 as the Councils position – showing a 4.7 year 5 year HLS which can be used as a basis for determining current applications before the Council with a view to approval where they are appropriate and sustainable in order to secure a 5 year HLS to ensure that speculative applications are not encouraged.
- Not to publish the AMR and 5 year HLS until the new 2019 AMR and 5 year HLS position is compiled after October 2019. This may risk submission of speculative

development and appeals because the Council's position is uncertain or equivocal.

**4. CONSULTATION:**

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

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

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

**6. IMPLICATIONS:**

The AMR provides an evidence base against which to monitor plan making progress and performance in order that policy formulation and decision making is effective in delivering sustainable development of the planning authority area. Not demonstrating a 5 year housing land supply may trigger paragraph 11 d. of the NPPF 2019 which requires the 'presumption in favour of sustainable development' to be applied to decision making in order to achieve a 5 year housing land supply.

**7. REASON FOR THE DECISION:**

To ensure that progress is maintained on housing delivery and creation of sustainable communities within Arun.

**8. BACKGROUND PAPERS:**

The AMR 2018 can be accessed on the Council's Web Site: <https://www.arun.gov.uk/authority-monitoring-report>

Appendix 1: Extract of paragraph 11.d from the NPPF 2019



## Appendix 1: Extract of paragraph 11.d from the NPPF

### The presumption in favour of sustainable development

11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>6</sup>; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>7</sup>, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup>; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

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## **Arun District Council**

*Authority Monitoring report 1<sup>st</sup> April 2017 – 31<sup>st</sup> March 2018*



*June 2019*

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## **Introduction**

### Authorities Monitoring Report (AMR)

Local Authorities are required to produce an Authority Monitoring Report (AMR) under the Localism Act section 113. This legislative requirement is prescribed under Regulation 34 of the Town and Country Planning (Local Development) (England) Regulations 2012, which clarifies that the AMR is the main mechanism for assessing the performance and effects of Arun's development plan and the timescales set out in the Local Development Scheme (LDS) The AMR therefore, forms critical evidence and feeds into emerging local plan preparation for Arun District.

The Act requires Councils to publish this information direct to the public at least yearly in the interests of transparency.

It should be emphasised that the following Chapters and analysis of data in the AMR are retrospective and only cover the reporting year which is 1 April 2017 to 31 March 2018. However, where necessary and appropriate, contextual updates may be provided.

The next AMR for the monitoring year 2018-2019 will be amended in order to reflect the adoption of the new Arun Local Plan 2011-2031 (adopted in July 2018) which replaces the 2003 Arun Local Plan within the local planning authority area (i.e. those areas of Arun District which fall outside of the South Downs National Park Authority). In addition, the monitoring requirements of the revised National Planning Policy Framework July 2018 & February 2019 will be accommodated.

## **Chapter 1: Background, Local Plan, Gypsy and Traveller Site Allocation DPD, Non-Strategic Site Allocations DPD & CIL Charging Schedule**

The Local Development Scheme (LDS) relevant to the monitoring period 2017 - 2020 for this AMR was approved by Full Council on 9<sup>th</sup> March 2017. A more recent LDS 2018-2021 was approved by Full Council on 18<sup>th</sup> July 2018 and updated in January 2019; however this is outside the monitoring period of this AMR.

The LDS 2017 – 2020 specifies that Arun District Council will be preparing the following Development Plan Documents:

1. The Local Plan (adopted July 2018)
2. Gypsy and Traveller and Travelling Showpeople Site Allocations Development Plan Document
3. Small Site Allocations Development Plan Document (now called the Non-Strategic Site Allocations Development Plan Document)
4. CIL Charging Schedule

The scheme also specifies that Arun District Council will be preparing the following supporting Supplementary Planning Documents and guides:

1. Open Space, Playing Pitch and Built Sport Facilities Supplementary Planning Document
2. Littlehampton Economic Growth Area Supplementary Planning Document
3. The Arun Design Guide

The following section summarises progress on the above documents' preparation. This will include the stage the document has reached in its preparation and whether the document is meeting the timetable within the Local Development Scheme.

### **1. The Local Plan**

- 1.1 The LDS 2017 – 2020 timetable for the preparation of the Local Plan was broadly met up to the monitoring period. The Local Plan was published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between 30<sup>th</sup> October 2014 and 12<sup>th</sup> December 2014. The Arun Local Plan was then submitted for independent examination to the Secretary of State for Communities and Local Government via the Planning Inspectorate on 30<sup>th</sup> January 2015 and the first of the Local Plan hearings took place in June 2015.
- 1.2 Following the meeting and the Hearings in June, a procedural meeting was held in July 2015 to consider the implications for future progress of the examination in the light of a new position adopted by the Council. Subsequently, the Inspector in a note dated 28<sup>th</sup> July 2015 agreed to a suspension of the examination for 12-18 months in order to allow draft modifications to be made to the Plan. The timetable for the Local Plan has since then, followed the timetable set out by the Inspector which superseded the LDS timetable as the document once submitted is in the hands of the

Inspectorate and not the local planning authority. In accordance with the Inspectors note, a number of key tasks were required to be undertaken according to an agreed timetable. The first of these was the consideration of a revised Objectively Assessed Need figure, using up to date evidence by the Council, An additional hearing date to discuss this, was held on 14<sup>th</sup> January 2016. In February 2016 the Inspector published a letter with conclusions about the OAN.

- 1.3 Following the publication of updated Household projection figures in 2016 a further revision of the OAN was necessary which also required further evidence gathering to inform revisions to the submitted Local Plan to accommodate the higher OAN figure. This led to the drafting and consultation on the Main Modifications to the Local Plan. These Main Modifications to the Local Plan were approved in March 2017 in accordance with the agreed timetable.
- 1.4 Following the approval of the Main Modifications in March 2017, and a six week period of public consultation running from 10<sup>th</sup> April to 30<sup>th</sup> May 2017, further examination hearings were held between 19<sup>th</sup> and 28<sup>th</sup> September 2017 in accordance with the timetable. The Inspectors 'Interim Views following the Hearings' was received by the Council in October 2017. This required further modifications and six week period of public consultation. This consultation ran from 12<sup>th</sup> January to 23<sup>rd</sup> February 2018, after which the results of the consultation were passed to the Inspector for consideration.
- 1.5 The Council received the Inspectors Report on the Examination of the Arun Local Plan on 4<sup>th</sup> July 2018, and the Arun Local Plan was adopted by resolution of the Full Council on 18<sup>th</sup> July 2018 with Main Modifications.
- 1.6 The receipt of the Inspectors Report and Adoption of the Local Plan occurred about six months behind the agreed timetable due to the additional six week period of public consultation required on the further proposed modifications. .

## **2. Gypsy & Traveller Site Allocations Development Plan Document (DPD)**

- 2.1 The timetable for preparation of a Gypsy and Traveller Site Allocations DPD (G&TSADPD) set out in the LDS 2017-2020 has not been achieved, although evidence gathering commenced in summer 2017. This delay has been created as a result of the need to update the background evidence alongside a change to the methodology used to forecast need from waiting list data using the revised planning definition of traveler households as set out in the Government's revised Planning Policy for Traveller Sites (PPTS) published in August 2015. The council is, therefore, working with adjoining authorities to update the current GTAA evidence in light of the policy change.
- 2.2 The preparation of the G&TSADPD is closely following the Local Plan in order to take account of the progress and outcomes of the Local Plan Examination and any necessary modifications. Following adoption of the Local plan, the preparation of a G&TSADPD is now being progressed without delay. The preparation timetable is in accordance with the LDS 2018 – 2021 (as

amended in January 2019) which is outside the monitoring period of this AMR.

**3. Non-Strategic Site Allocations Development Plan Document (NSSADPD)**

- 3.1 The timetable for the preparation of the Non-Strategic Site Allocations Development Plan Document (NSSADPD) as set out in the LDS 2017 – 2020 sits outside the monitoring period for this AMR.

**4. Community Infrastructure Levy (CIL) Charging Schedule**

- 4.1 The LDS 2017 – 2020 states that the preparation of the CIL Charging Schedule will commence when the Local Plan is adopted. The timetable for the preparation of the CIL Charging Schedule as set out within the LDS 2017 – 2020, sits outside the monitoring period for this AMR. The LDS 2018 - 2021 updates this timetable (as amended in January 2019) however this is outside the monitoring period for this AMR.



## Chapter 2: Neighbourhood Planning

### 1. Introduction

1.1 The Localism Act 2011 introduced a new tier of plan-making opportunities for communities, who will be able to prepare Neighbourhood Development Plans, Neighbourhood Development Orders and Community Right to Build Orders. Within Arun, the town and parish councils are the responsible bodies for producing Neighbourhood Development Plans because Arun is parished.

1.2 Arun District Council has taken a positive approach to neighbourhood planning and provides support and advice to those communities interested in producing plans. Under the Town and Country Planning Act 1990 (as amended), the Council has a statutory duty to assist communities in the preparation of Neighbourhood Development Plans (NDPs) and Orders and to take plans through a process of examination and referendum.

The Localism Act 2011 (Part 6 chapter 3) sets out the LPA responsibilities as:

- Designating a forum
- Designating the area of the NDP
- Advising or assisting communities in the preparation of a neighbourhood plan
- Checking a submitted plan meets the legal requirements
- Arranging for the independent examination of the plan
- Following the examination, determining whether the neighbourhood plan meets the basic conditions and other legal requirements in the examiner's report through a decision statement
- Subject to the results of the referendum/s bringing the plan into force

In addition legislation sets out who the relevant councils are with responsibility for arranging the referendums. The 1990 Act Schedule 4B para 3 states:

“A local planning authority must give such advice or assistance to qualifying bodies as, in all the circumstances, they consider appropriate for the purpose of, or in connection with, facilitating the making of proposals for NDPs in relation to neighbourhood areas within their area”.

This applies to NDPs through S38A of the Planning and Compulsory Purchase Act 2004. There is no requirement to give financial assistance.

### 2. NDP Update and Progress

2.1 The level of interest in neighbourhood planning in Arun District Council remains solid. There are currently 17 Plans undertaken; all of which are led by a Parish/ Town Council or a sub group of the Parish / Town Council and include the following Parish areas:

## Area Designation Approved

1. Aldingbourne\*
2. Angmering\*
3. Arundel\*
4. Barnham & Eastergate
5. Bersted
6. Bognor Regis
7. Climping
8. East Preston
9. Felpham
10. Ferring
11. Ford
12. Kingston
13. Littlehampton
14. Pagham
15. Rustington
16. Walberton\*
17. Yapton

*\*Parts of these parishes fall within South Downs National Park but Arun District Council is the Local Planning Authority for the purposes of the Neighbourhood Development Plans*

- 2.2 There are also 3 Community Right to Build Orders (CRTBOs) made in Ferring. The Community Right to Build Order (CRTBO) is a particular type of neighbourhood development order, meaning that it allows people to propose development in their local area and obtain permission for it, without having to go through a lengthy planning process. A proposal can be developed as part of a full neighbourhood planning process, or on its own. The statutory process is very similar to a Neighbourhood Development Plan and therefore has a referendum after the examination.
- 2.3 As of October 2018, there are 15 'made' (adopted) NDPs and 3 'made' CRTBOs in the District.

The following submissions have been received to date and show the current status of each NDP:

### Made Plans

- |     |                      |                                |
|-----|----------------------|--------------------------------|
| 1.  | Aldingbourne         | ('made' 9th November 2016)     |
| 2.  | Angmering            | ('made' on 11th March 2015)    |
| 3.  | Arundel              | ('made' on 30th April 2014)    |
| 4.  | Barnham & Eastergate | ('made' on 16th July 2014)     |
| 5.  | Bersted              | ('made' on 5th November 2014)  |
| 6.  | Bognor Regis         | ('made' on 11th November 2015) |
| 7.  | Climping             | ('made' on 13th January 2016)  |
| 8.  | East Preston         | ('made' on 11th March 2015)    |
| 9.  | Felpham              | ('made' on 16th July 2014)     |
| 10. | Ferring              | ('made' on 14th January 2015)  |
| 11. | Kingston             | ('made' on 11th March 2015)    |

- |     |               |  |
|-----|---------------|--|
| 12. | Littlehampton | (‘made’ on 5th November 2014)          |
| 13. | Yapton        | (‘made’ on 5th November 2014)          |
| 14. | Rustington    | (‘made’ on 11th March 2015)            |
| 15. | Walberton     | (‘made’ on 8 <sup>th</sup> March 2017) |

### **Community Right To Build Orders (CRTBO)**

1. Ferring CRTBO1 -(‘made’ on 14th January 2015)
2. Ferring CRTBO2 - (‘made’ on 14th January 2015)
3. Ferring CRTBO3 - (‘made’ on 14th January 2015)

### **Post Examination**

1. Ford (passed referendum on 8<sup>th</sup> November 2018 and to be ‘made’ at Full Council on 9<sup>th</sup> January 2019)

### **Pre-submission (Reg.14)**

1. Pagham

2.4 The majority of the plans have been ‘made’ prior to the Local Plan being adopted and so the next phase for the parishes will be for each to consider monitoring and reviewing their ‘made’ plan. Arun District Council is actively encouraging the parishes regarding the need to review their plans.

2.5 Due to an increase in the Objectively Assessed Needs in the District, the adopted ADC Local Plan 2018 commits to a Non-Strategic Sites DPD of at least 1,250 homes to be identified through NDPs (review of made/new) and a DPD for the residual figure for those areas not allocating sites. This process is at early stages but has commenced.

## **3. Government Update**

3.1 MHCLG has a Pinterest site that has all the submitted plans. By using the links it should be possible to get to examiners reports where these have been published. These are a very useful resource. The Pinterest site also gives access to the relevant submission documents (examples of basic condition statements, consultation statements etc.).

The site can be found at:

<http://www.pinterest.com/nplanning/neighbourhood-plans/>

## **4. Conclusion**

4.1 A ‘made’ NDP will form part of the Development Plan for the District and sit alongside the Arun Local Plan which sets out policies and proposals. It will therefore be used by Arun District Council to help make decisions on planning applications received for the area covered.

4.2 Arun District Council continues to be one of the lead authorities for

neighbourhood planning nationally and amongst Local Planning Authorities with the most 'made' Plans and CRTBOs in the country to date.

For further information please visit: <http://www.arun.gov.uk/made-plans>

## Chapter 3: Duty to Cooperate

### Duty to Cooperate

- 1.1 As of March 2012, as required by the Localism Act 2011, public bodies have a duty to cooperate on planning issues that cross administrative boundaries. Local authorities are expected to demonstrate evidence of having co-operated with a range of bodies prescribed by the regulations where it is appropriate to do so in order to enable the delivery of sustainable development. Furthermore, local authorities are expected to document the outcome of such co-operation and to identify any unresolved issues.
- 1.2 Co-operative planning is largely undertaken through the West Sussex and Greater Brighton (WS&GB) Strategic Planning Board. This body continues to evolve and currently includes Chichester, Arun, Worthing, Adur, Brighton & Hove, Lewes, Mid Sussex, Horsham, SDNPA, West Sussex CC and East Sussex CC. The purpose of the Board is to:-
  - (1) identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
  - (2) support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.
- 1.3 In July 2015, the Local Plan Inspector examining Arun's Local Plan, issued some initial findings on the 'Duty to Cooperate'. The Inspector concluded that Arun had met its obligation to 'engage constructively' in accordance with the NPPF. However, he acknowledged that the suspension period should be used to find clear outcomes on the contribution Arun could make to unmet needs within the Housing Market Area.
- 1.4 In January 2016 the WS&GB Strategic Planning Board agreed an updated Local Strategic Statement (LSS2). The LSS2 focuses on the strategic issues that are shared across WS&GB or that will impact on the long term sustainability of the area, providing an overlay for local plans and the business priorities of key stakeholders.
- 1.5 Since the Local Plan Examination was suspended February 2016, and in accordance with regulations set out in the Planning and Compulsory Purchase Act 2004 (as amended), the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (paragraphs 156, 178 – 181), the Council has continued to work collaboratively with other bodies to ensure the delivery of strategic priorities across local boundaries in a co-ordinated way and that shared goals are reflected in the Council's Local Plan.
- 1.6 During the monitoring year (1<sup>st</sup> April 2017 – 31<sup>st</sup> March 2018) the Council has held numerous meetings with all local authorities within the Housing Market Area to discuss progress of the Local Plan and evidence base work. Work on

reviewing the assessment of the Housing Market Area through a review of the LSS2 has been commenced.

- 1.7 A Strategic approach to access management at Pagham Harbour has been agreed and is being used in the determination of planning applications.
- 1.8 The Inspectors report on the Examination of the Arun Local Plan, which was received on 4<sup>th</sup> July 2018, stated that the Inspector is satisfied that where necessary, the Council engaged constructively, actively and on an ongoing basis in the preparation of the Local Plan and concluded that the 'Duty to Co-operate' has therefore, been met.

## Chapter 4: Housing Land Supply

### Arun District Council 5 year Housing Land Supply 2018-2023

This Chapter of the AMR sets out the Council's assessment of Housing Land Supply (HLS) for the Arun planning authority area (i.e. excluding areas of Arun District which fall within the South Downs National Park – SDNP) for the period 2018-2023. The methodology is broadly in accordance with the provisions of the Government's revised National Planning Policy Framework (NPPF last updated February 2019), taking into account the guidance in the Planning Practice Guidance (PPG) and also the Housing Delivery Test (HDT). However, it should be noted that the recently adopted Arun Local Plan (2011-2031) which was adopted in July 2018 was prepared largely under the previous 2012 version of the NPPF and the monitoring period for the AMR is retrospective up until 31<sup>st</sup> March 2018.

#### **1. National Planning Policy Framework**

- 1.1 The Governments latest NPPF was updated in July 2018 and again in February 2019. Significantly boosting the supply of homes is still a key objective, and this includes a requirement that local planning authorities should identify and update annually a supply of specific deliverable sites to provide five years' worth of housing against their housing requirements.
- 1.2 The NPPF 2019 has introduced some sweeping changes on how authorities measure their Objectively Assessed Housing Need (OAN), measure past performance on housing delivery (against their housing need or requirement), and looking forward, how to calculate an adequate 5 year housing land supply:-
  - Objectively Assessed Housing Need (OAN) is now calculated according to the Government's Standard Housing Methodology (which establishes a baseline annualised 10 year projections for any plan period uplifted for a local affordability factor (e.g. where above 4 times the local average earnings to house prices ratio) but 'capped' at 40% where there is an up to date Local Plan;
  - Housing Delivery Test (HDT) – measures performance over the previous 3 years and is expressed as a percentage of the Local Plan housing target or 'local housing need' (OAN) divided by the number of housing completions. The housing target must be within a Local Plan adopted within the last 5 years and may include a 'stepped housing trajectory' as in the case for Arun District). The HDT is the basis for calculating an authority's 'buffer' for calculating a 5 year housing land supply
  - Calculating a 5 year housing land supply (5 YHLS) with emphasis on clearly evidenced 'specific deliverable sites' available in the right locations now that can be developed within 5 years
- 1.3 The NPPF states that LPAs may make an allowance for windfall sites as part of the anticipated supply if they have compelling evidence that such sites will

provide a reliable source of supply. This should not include residential gardens.

1.4 The NPPF 2019 now contains further guidance on deliverability and developability within Annex 2. To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. 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 five 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 five years.

1.5 To be considered developable, sites should be in a suitable location for residential development, with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

## **2. Planning Practice Guidance (PPG)**

2.1 The Government's streamlined planning guidance was launched on 6th March 2014 and is continually updated. It includes guidance on issues such as the starting point for the HLS, deliverability, developability and dealing with past under- and over- supply. It was last updated in February 2019.

## **3. Housing Delivery Test**

3.1 The results of the first Housing Delivery Test for 2018 were published in February 2019. The HDT introduced with the Governments revised NPPF in July 2018, is the percentage measurement of the 'Total net homes delivered over a three year period' divided by the 'Total number of homes required over a three year period' (Housing Delivery Test Measurement rule Book July 2018):-

$$\text{Housing Delivery Test (\%)} = \frac{\text{Total net homes delivered over three year period}}{\text{Total number of homes required over three year period}}$$

3.2 Where an adopted Local Plan sets out a housing requirement figure which is less than 5 years old, the housing requirement figure used by the housing delivery test will be:-



The lower of:-

- either the latest adopted housing requirement (including any included unmet need from neighbouring authorities) and will be the stepped housing requirement (or annualized average if there is no stepped requirement);
- or the 'minimum annual local housing need' figure (including unmet need) that has been tested at examination;
- If the housing requirement is set out as a range the lower of the range will be used.

3.3 For areas without a recently adopted (or reviewed) plan (i.e. more than 5 years old) the 'minimum annual local housing need' figure (described above) will be used. Transitional arrangements clarify that because a rolling three year HDT was not in existence before 2018 the 'minimum local housing need figure', is replaced by household projections for the years 2015-16; 2016-17; 2017-18.

3.4 Arun recently adopted a Local Plan – the Arun Local Plan 2018 (ALP 2018) covering the period 2011-2031. Policy H SP1 'The Housing Requirement' sets out the 5 year annualised whole plan target which includes an element of unmet need from neighbouring local authorities. However, paragraph 12.1.5 of the ALP 2018 clarifies that:-

*"Housing supply is stepped across the plan period to match the planned delivery of sites. There are targets for each five year period in policy H SP1 but these deliver the whole plan target of at least 20,000 homes by 2031. For the purposes of calculating the District's five year housing land supply a 20% buffer is applied to reflect persistent under delivery. In addition Planning Practice Guidance promotes the approach that if there is a shortfall in supply it should be dealt with in the first five years (the Sedgfield approach). The housing shortfall of 306 dwellings is included within the five year period 2017-2022 as set out in Appendix 3 Arun Update to Publication Plan (LP) and Housing Implementation Strategy (HIS)"*

3.5 Further, ALP 2018 paragraph 12.1.6 states:-

*"The Plan period runs from 2011 to 2031. The housing trajectory (Picture 12.1) covering the Plan period is included as an appendix to the Plan, and is set out in further detail within the Housing Implementation Strategy..."*

3.6 While ALP 2018 paragraph 12.1.6 states:-

*"Due to the nature of the Local Plan housing supply and the constraints that exist in the District, the Local Plan includes a phased housing target over the course of the plan period, as explained and justified in detail within the Housing Implementation Strategy."*

- 3.7 The correct housing need figure for Arun should be based on the adopted 'stepped housing requirement' on the basis of the above and the recognition by the Planning Inspector that the stepped approach in Arun is justified by the particular circumstances (paragraphs 87-88 'Report on the Examination of the Arun local Plan' July 2018:-

<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n12488.pdf&ver=12506>

- 3.8 There are consequences for not meeting the HDT and the 5 year housing land supply as set out in the NPPF, which relate to the application of the 'presumption in favour of sustainable development' (para. 11d). Failure in either case will trigger NPPF Para 11.d. The HDT sets specified percentage thresholds where the housing requirement calculation would trigger para 11d such that applications should be granted, provided such a decision would not conflict with the policies, protected assets and designations of the NPPF or that the adverse impacts of doing so demonstrably outweigh the benefits against the NPPF as a whole.

- 3.9 Following annual publication of the HDT, the following percentages thresholds against the housing requirement will determine if a local authority passes or fails the HDT over a three year period and the consequences of not doing so:

- November 2018 where housing delivery falls below 25% - the 'Presumption in favor of sustainable development' will apply immediately
- November 2019 where housing delivery falls below 45% The 'Presumption' applies
- November 2020 where housing delivery falls below 75% - The 'Presumption' applies

- 3.10 The NPPF sets out further penalties against higher percentage thresholds:

- November 2018 where housing delivery falls below 95% of requirements the NPPF states that an 'Action Plan' should be published;
- November 2018 where housing delivery falls below 85% of the requirement the NPPF states that a 20% buffer will be added to the 5 year housing land requirement

- 3.11 The published HDT for Arun District (see para 3.2 to 3.5 above), was 91% 2017/18 and can be accessed here:- <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement> .

The consequence of the above result is that work has started on producing an Action Plan.

## **4. Housing Requirement**

- 4.1 The NPPF advises that strategic policies in Local Plans should, as a minimum, provide for objectively assessed needs for housing (paragraph 11).

These policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development, including planning for and allocating sufficient sites (paragraph 23).

- 4.2 The housing requirement in Arun has been established with a recently adopted Local Plan – ALP 2018 for the period 2011-2031. The ALP 2018 was prepared under the previous NPPF but meets the NPPF 2019 requirements above. The whole plan requirement is set out in Policy H SP1 ‘The Housing Requirement’ which is 20,000 new homes over the plan period (i.e. 1,000 per annum). This 1,000 pa target comprises the OAN at 919 dwellings per annum and an additional 81 homes per annum to meet unmet housing need over the plan period to 2031. This target will therefore, contribute to the overall supply to meet the needs of the local Housing Market Area (HMA) around Arun as well as the greater Coastal West Sussex HMA.
- 4.3 Due to the shortfall in delivery from the beginning of the Local Plan period and lead times required to build-out strategic allocations, it was established at Examination that a ‘Stepped Trajectory’ would be justified (see para 3.2-3.5 above). The Stepped Housing Targets mean a lower figure of 610 would apply for the first 5 years of the plan (2011-2015) rising to; 930 for years 6-10 (i.e. 2016-2020); 1310 for years 11-15 (i.e. 2021-2025); and dropping to 960 for years 16-20 (i.e. 2026-2030).
- 4.4 In future years and reviews of Arun’s Local Plan, the PPG, updated in line with the 2019 NPPF, requires local authorities to adopt the ‘Standard Housing Methodology’ (standard method) for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and market uplift for housing affordability which is then capped at 40% above an adopted plan target. The method identifies a minimum annual housing need figure rather than a housing requirement. (PPG starting ref Paragraph: 002 Reference ID: 2a-002-20190220).

## 5. **Buffer**

- 5.1 Paragraph 73 of the NPPF 2019 states Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the

previous three years, to improve the prospect of achieving the planned supply.

As Arun District Council scored 91% in the 2018 Housing Delivery Test a 5% buffer has been added to the requirement figure.

- 5.2 The historic performance of Arun District in terms of delivering housing completions is set out in **Appendix 1 - Table 1**. It provides annualised net housing completions for Arun District from 2006-2018. Up until 2011/12 it included sites which would now fall within the Planning Authority of South Downs National Park. From 2012/13 onwards the completions in SDNP are excluded from this data. But it should also be noted that the HDT result includes completions in the SDNP.

**Appendix 1 - Table 2** shows that completions have averaged 635dpa in the last 5 years (2013-2017) which does meet the stepped trajectory target of 610 for years 2013/14-2015/16 but is below the annualized stepped target of 930 for years 2016/17-2017/18 which together over the 5 years would require 738. The most recent completions for 2017/18 shows 704 and is an increase on the previous year and suggests that delivery may improve towards the combined 5 year stepped target.

## **6. Housing Land Supply Data**

- 6.1 The assessment of Housing Land Supply within the AMR draws on a number of evidence sources in order to calculate projected completion rates. The 5 Year Housing Land Supply for 2018-2023 has been prepared using the Residential Land Availability (RLA) data supplied from West Sussex County Council (WSCC) as at 31<sup>st</sup> March 2018 (The latest available data)  
<https://www.westsussex.gov.uk/about-the-council/information-and-data/data-store/place-data/>

## **7. Projected completions on large sites with planning permission as at 31<sup>st</sup> March 2018**

- 7.1 For the purposes of assessing the Housing Land Supply 'Large' sites are taken to be sites capable of yielding 6 dwellings or more. (Note that between 2013 and 2015 the Housing Land Supply assessments for the District applied 10 dwellings and more as large sites).
- 7.2 WSCC surveys all large sites with planning permission for 6 dwellings or more in West Sussex annually and provides a consistent assessment of the status of available sites, in terms of commencement, actual completion, and projected completions. They liaise with the developers of the large sites with planning permission to gain evidence of when completions are predicted to come forward. This, therefore, provides a reliable basis for such sites being included in the assessment, in the terms of the sites being considered deliverable. The sites on which this assessment is based are listed in **Appendix 2**.

8. **Projected completions on Strategic Allocation Sites without Planning Permission as at 31<sup>st</sup> March 2018.**

The stepped trajectory (Appendix 7) shows the predicted build out rates of the strategic allocation sites. These updated build out rates have been informed by recent site promotor updates and our own assessment of the realistic achievability of development timescales. The HELAA includes each site that forms part of the overall Strategic site and the details of the sites included can be seen under **Appendix 3**.

9. **Projected completions on Housing & Economic Land Availability Assessment (HELAA) sites as at December 2018**

9.1 A general 'call for sites' was undertaken in May/June 2018 requesting updates to existing sites and new sites to be included. The status of HELAA sites were updated and submitted new sites added up until up to the end of the year. The draft HELAA document and interactive map was produced in December 2018. <http://www1.arun.gov.uk/webapps/wml/Map.aspx?MapName=helaa>

9.2 For the purpose of this assessment, sites of 6 or more dwellings identified within the HELAA as suitable, deliverable, achievable and within the current built up area are included - see **Appendix 4** for details of sites included.

10. **Projected completions on Made Neighbourhood Plan Sites as at 31<sup>st</sup> March**

10.1 Sites allocated in Neighbourhood Plans that have either been made or that have passed examination (as at 31<sup>st</sup> March 2018) are included if they are considered likely to come forward within the next 5 years. All such sites have been assessed as deliverable as part of the Neighbourhood Plan process – see **Appendix 5** for details of sites included.

11. **Projected completions & Implementation rates on small sites as at 31<sup>st</sup> March 2018.**

11.1 The WSCC RLA survey includes comprehensive information on all planning permissions for residential development of all site sizes and dwelling numbers. From this data it is possible to determine the number of dwellings permitted on all 'small' sites, i.e. sites of 5 dwellings or less, as at 31<sup>st</sup> March 2018.

11.2 These small sites are then categorised as either under construction ('In Course of Erection' – ICE), or not commenced. Sites under construction are assumed to be fully built out within the next 5 years, so these are included in the 5 year supply. Of the sites that are not yet commenced a non-implementation rate is applied. The data and calculations relating to small site implementation are set out in **Appendix 6**.

12. **Windfall calculation**

- 12.1 The NPPF 2018 (paragraph 70) provides for LPAs to make an allowance for windfall sites as part of the anticipated supply if there is compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 12.2 **Appendix 6** includes data from the WSCC RLA on dwelling completions on small sites from 2003 to 2018, specifically excluding development on residential gardens, in compliance with NPPF para 70. This demonstrates that completions on such sites were never lower than 19 dpa, and were as high as 147 dpa with an overall average of 76 dpa for the last 14 years.
- 12.3 On this basis it is concluded that it is reasonable to provide a windfall allowance of small sites at a rate of **76** dwellings per annum (the average for the period 2003-2017) for the 5 year HLS period. A windfall figure is only included within a year's worth of housing supply when the supply from existing permissions on small sites is less than 76. This ensures that no one year exceeds 76 dwellings as a windfall allowance. As well as Appendix 5 the table below demonstrates this:

	2018/19	2019/20	2020/21	2021/22	2022/23	Total
Small site Dwellings projected	109	87	57	15	2	271
Windfalls allowance	<b>0</b>	<b>0</b>	<b>19</b>	<b>60</b>	<b>74</b>	153

### **13. Housing Land Supply Assessment**

- 13.1 Following successful adoption of the ALP 2018 it is established that Arun has a 5 year housing land supply up until 31<sup>st</sup> October 2019 (NPPF 2019: Paragraph 74).
- 13.2 However, since adoption it is recognised that the delivery rates have not been as forthcoming as previously predicted to enable the completions to come through as anticipated. The reasons for this will be covered in more detail by the Action Plan which is currently being written but the following points indicate why the supply has fallen:
- The quality of some of the major applications has not been of sufficient quality, to allow a timely approval.
  - Some applications which had officer recommendation for approval were subsequently refused at Committee.
  - The actual rate of completions is highly dependent on the developers, which is largely out of Local Authority control.

- Developers have not delivered on their previously promoted build out rates.
- Applications on all the strategic sites have not been as forthcoming as anticipated, for example following the Local Plan examination in 2017, planning applications were expected on Bersted (SD3) & BEW (SD5) within 6/9 months of the Examination but to date have still not been received.

13.3 The latest update of the Local Plan Housing Trajectory can be viewed at Appendix 7. This shows the actual and predicted dwelling numbers that make up the Housing Land Supply over the whole plan period (2011 to 2031).

13.4 The table below summarises how the housing land supply assessment has been calculated using the various data sources outlined above. It indicates that there is a 4.7 year land supply.

2018 - 5 Year Housing Land Supply based on Arun's Local Plan Stepped Trajectory - Large Sites Commitments, NP Allocations and HELAA sites all include a 10% slippage reduction

Stepped Trajectory Housing requirement 2018-2022 (930 x 3 + 1310 x 2 + 537 Shortfall*)	5947
5% Buffer	297
Total Requirement 2018-2023	6244
Large Site Commitments (as at 31 <sup>st</sup> March 2018 from WSCC RLA data – Appendix 2)	2780
Small Site Commitments (as at 31 <sup>st</sup> March 2018 from WSCC RLA data – Appendix 6)	271
Windfall allowance (as at 31 <sup>st</sup> March from WSCC RLA data – Appendix 6)	153
Made Neighbourhood Plan Allocations without planning permission as at 31 <sup>st</sup> March 2018 from HELAA – Appendix 5)	352
Deliverable HELAA Sites within built up area (if a HELAA site gained Planning permission after 31 <sup>st</sup> March 2018 it will still show in this category up until 31 <sup>st</sup> March 2019 when it will then move to the large commitments category – Appendix 4)	348
Strategic Site Allocations (without PP as at 31 <sup>st</sup> March 2018 – Appendix 3)	2007
Total Supply	5911
Supply in years	4.7

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*\*Shortfall calculated as follows: Stepped Trajectory Requirement for years 2011 - 2018 was  $610 \times 5 + 930 \times 2 = 4910$  Less completions for years 2011-2018 =  $4373 = 537$*

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## Appendix 1 – Historic and latest dwelling completions

## Appendix 1 - Historic and Latest Dwelling Completions

**Table 1** Net Completions - WSCC RLA data Excluding SDNPA

Data last 10 years

<b>Years</b>	<b>Total Actual Completions</b>
2008/9	548
2009/10	416
2010/11	519
2011/12	722
2012/13	475
2013/14	359
2014/15	601
2015/16	890
2016/17	622
2017/18	704
<b>Total</b>	<b>5856</b>
<b>Average</b>	<b>586</b>

**Table 2** Net Completions - WSCC RLA data Excluding SDNPA

Data last 5 years

<b>Years</b>	<b>Total Actual Completions</b>
2013/14	359
2014/15	601
2015/16	890
2016/17	622
2017/18	704
<b>Total</b>	<b>3176</b>
<b>Average</b>	<b>635</b>

**Appendix 2 – Large site dwelling permissions from Residential Land Availability Survey included in the 5 year supply/Local Plan Trajectory**

Appendix 2 - Large Site Commitments (from RLA data as at 31st March 2018)

Parish	Planning Reference	Site Address	Site Description	Total Commitment (if started the amount left to build)	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/2028	2028/29	2029/30	2030/31
Angmering	A/144/15/PL	West End Nursery Roundstone Lane Angmering Littlehampton	246 No. residential dwellings including garages & associated parking, affordable housing, associated landscape & infrastructure & addition of pumping station. Utilisation of 2 No. existing vehicular access points from Roundstone Lane & formation of access road to serve the development.	167	49	81	37	0	0	0	0	0	0	0	0	0	0
Angmering	A/51/14/OUT	Manor Nursery High Street Angmering	Outline Application with Some Matters Reserved for demolition of the existing Manor Nursery Garden Centre and hard standing and redevelopment for 32 dwellings with associated access, public open space and landscaping	32	0	0	22	10	0	0	0	0	0	0	0	0	0
Angmering	A/154/14/OUT	Pound Place Roundstone Lane Angmering	Outline Application for the erection of 18 No. dwellings.	18	0	0	18	0	0	0	0	0	0	0	0	0	0
Angmering	A/131/16/OUT	Land between New Place Bungalow & Arundel Road Angmering	Outline planning application with some matters reserved for 9 No. one & a half storey houses with garaging, including 3No. affordable housing units.	9	0	0	9	0	0	0	0	0	0	0	0	0	0
Angmering	A/142/16/OUT	Merry England Nursery Dappers Lane Angmering	Outline application with some matters reserved for the demolition of existing buildings & erection of 18 No. dwellings and the provision of pedestrian footpath adjacent to Dappers Lane. This application is a Departure from the Development Plan.	18	0	18	0	0	0	0	0	0	0	0	0	0	0
Angmering	A/132/17/OUT	Quiet Waters Roundstone Lane Angmering	Outline application with some matters reserved for the demolition of the existing single dwelling & construction of 30 No. dwellings (resubmission following A/39/17/OUT). This application is a Departure from the Development Plan.	30	0	0	30	0	0	0	0	0	0	0	0	0	0
Angmering	A/169/17/OUT	Land west of Brook Lane & South of A259 Angmering	Outline application with all matters reserved for demolition of existing buildings on site & erection of a mixed use development comprising up to 90 No. residential units, a care home (Use Class C2 & C3) & ancillary facilities including railway crossing, together with associated access, car parking & landscaping (resubmission following A/44/17/OUT). This application is a Departure from the Development Plan & lies within the parishes of Littlehampton & Rustington.	90	0	0	90	0	0	0	0	0	0	0	0	0	0
Angmering	A/178/17/OUT	Crete Nursery Dappers Lane Angmering	Outline application with some matters reserved for the demolition of existing outbuildings, retention of 1 No. dwelling & the erection of 6 No. dwellings. This application is a Departure from the Development Plan.	6	0	0	6	0	0	0	0	0	0	0	0	0	0
Aldingbourne	AL/107/16/RES	Land west of Westergate Street East of Hook Lane Westergate	Application for Reserved Matters application following Outline Planning Permission AL/39/13 for the demolition of Oakdene and all other structures within the site and the erection of 79 dwellings, public open space, children's play areas, landscaping, drainage measures, sub-station, pumping station and all other associated works.	78	23	30	25	0	0	0	0	0	0	0	0	0	0
Aldingbourne	AL/102/17/RES	Nyton Nursery Nyton Road Westergate Aldingbourne	Application for approval of Reserved Matters following outline application AL/61/13/ for the demolition of existing glasshouses, bungalow, stables & outbuildings & residential development of 268 dwellings incl 30% affordable housing (incorporating 60 senior living units) with associated access, public open space & landscaping	286	0	0	111	80	50	45	0	0	0	0	0	0	0
Aldingbourne	AL/8/16/OUT	Land south & west of Barnside & east of pond Hook Lane Aldingbourne	Outline application with all matters reserved for a residential development of up to 14 No. dwellings	14	0	0	14	0	0	0	0	0	0	0	0	0	0
Bersted		Bersted Phase 1 Policy Site 6	Bersted Multiple Permissions (773 Total Dwellings)	2	0	2	0	0	0	0	0	0	0	0	0	0	0
Bersted		Bersted Phase 2 Policy Site 6	Bersted Multiple Permissions (773 Total Dwellings)	43	42	1	0	0	0	0	0	0	0	0	0	0	0
Bersted		Bersted Phase 3 Policy Site 6	Bersted Multiple Permissions (773 Total Dwellings)	30	30	0	0	0	0	0	0	0	0	0	0	0	0
Bersted		Bersted Phase 4 Policy Site 6	Bersted Multiple Permissions (773 Total Dwellings)	38	0	0	15	15	8	0	0	0	0	0	0	0	0
Bersted	BE/74/17/PL	27 North Bersted Street Bersted	Demolish existing bungalow, create a new access road & erect 10 No. two storey houses (amendment to application BE/45/16/PL).	10	10	0	0	0	0	0	0	0	0	0	0	0	0
Bersted	BE/113/17/RES	Land West of New Barn Lane North Bersted	Approval of reserved matters following outline consent BE/18/17/PL for appearance, landscaping, layout & scale for a mix of up to 90No. residential units, associated open space, landscaping, access & car parking	90	0	5	57	28	0	0	0	0	0	0	0	0	0
Bersted	BE/63/17/OUT	The Cottage Shripney Road Bognor Regis	Outline planning application with some matters reserved (Access only) for 20No. houses & flats, 1No. replacement dwelling (21No. units in total) with car parking, landscaping & associated infrastructure & access off Shripney Road (A29) and new footway both along the site frontage and across the A29 traffic island, all following the demolition of the existing dwelling & outbuildings. This application is a Departure from the Development Plan	21	0	0	21	0	0	0	0	0	0	0	0	0	0
Bersted	BE/77/16/OUT	Land West of New Barn Lane Bersted	Outline application with all matters reserved for up to 50 residential units, landscaping, amenity space, car & cycle parking, roads, service & drainage infrastructure & other associated works. Departure from the Development plan.	50	0	0	0	50	0	0	0	0	0	0	0	0	0
Barnham	BN/43/16/PL	Angels Nursery Yapton Road Barnham	95 No. dwellings together with access, landscaping open space & associated works.	95	0	0	58	37	0	0	0	0	0	0	0	0	0





Littlehampton	LU/197/17/PL	90 & 91 South Terrace Littlehampton	Change of use of existing leisure use of upper ground floor to form 3 No. flats, extension of first floor to form 2 No. flats & creation of 1 No. flat in roof space (resubmission following LU/395/14/PL & LU/84/16/PL).	6	0	6	0	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/13/15/PL	The Old Dairy Behind 3 & 5 Church Street Littlehampton	Demolition of original dairy distribution depot and construction of eight dwellings and ancillary works. This application affects the character and appearance of the Littlehampton (East Street) Conservation Area.	8	8	0	0	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/173/16/PL	38 & 40 East Street & 35 Fitzalan Road Littlehampton	Redevelopment to form 38 sheltered apartments for the elderly including communal facilities, access, car parking & landscaping	38	0	38	0	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/287/17/PL	46a & 47 Pier Road & Land north of Clifton Road Littlehampton	Demolition of existing buildings, change of use & erection of 1 No. building incorporate office (B1) at ground floor & 8 No. dwellings at first and second floor level.	8	0	0	8	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/364/17/PL	Formerly 'The Tap and Barrel' 2-13 Duke Street Littlehampton	Retention & conversion of former Public House building & the erection of two storey block to provide a total of 9 No. residential units with associated parking. Re-submission of planning application LU/117/17/PL	9	0	0	9	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/323/17/PL	United Services Maltravers Road Littlehampton	Change of use of former United Services Club (Sui Generis) to 10 No. flats (C3 Dwelling House) with associated landscaping, parking, bins & recycling storage.	10	0	0	10	0	0	0	0	0	0	0	0	0	0	
Bognor Regis		46-48 High Street Bognor Regis	Conversion of 6 offices to form 4 one bed flats, 2 studio flats and construction of 2 two bed flats.	2	0	0	2	0	0	0	0	0	0	0	0	0	0	
Bognor Regis	BR/130/17/PL	The Royal Hotel The Esplanade Bognor Regis	Change of Use of hotel & function room/licensed bar (C1 Hotel) to 18No. flats (C3 Dwellinghouses). This application affects the character and appearance of The Steyne Conservation Area. Resubmission of BR/155/15/PL	18	0	18	0	0	0	0	0	0	0	0	0	0	0	
Bognor Regis	BR/222/16/PD	Staffurth & Bray 6 York Road Bognor Regis	Notification for prior approval under Part O for change of use from office (ClassB1(a)) to 8 No. residential apartments (Class C3)	8	0	8	0	0	0	0	0	0	0	0	0	0	0	
Bognor Regis	BR/270/17/PL	56 High Street Bognor Regis	Change of use from existing retail (A1 Shops) at ground floor to offices (A2 Financial & Professional Services), conversion of 1st floor to 3 No.2 bed flats, additional 2 storeys to make 2nd & 3rd floors for 6 No. 2 bed flats & external staircase to rear.	9	0	0	9	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/44/14/	Phase 2 Land south of the railway Courtwick Lane Littlehampton	Approval of Reserved Matters following Outline Approval LU/355/10 for Phase 2, 185 units for layout, appearance scale and landscape of dwellings. Departure from the Development Plan.	34	34	0	0	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/24/17/PL	6 & 7 Court Wick Park Cottages Courtwick Lane Littlehampton	Demolition of No 6 & No 7 Courtwick Park Cottages & associated outbuildings & erection of 8 No. dwellings	8	8	0	0	0	0	0	0	0	0	0	0	0	0	
Littlehampton	LU/258/16/PL	Old Mead House Old Mead Road Littlehampton	Change of use of the land for the stationing of 7 no. mobile homes for permanent residential occupation and the erection of a B1(a) office building. This application is a Departure from the Development Plan.	4	0	4	0	0	0	0	0	0	0	0	0	0	0	
					485	405	1421	619	188									
										<b>3118 = 5 Year Supply - 29 Losses = 3089 less 10% = 2780</b>								

**Appendix 3 – Strategic Allocation sites (without planning permission) from the HELAA included in the 5 year supply/Trajectory**



Appendix 3 for 5 year HLS - Strategic Sites (without PP at base date) from HELAA

HELAA Ref	Address	Latest Status comments	Status	Parish	Committment	Pending	PA Ref	RLA Base Date	Committed Yield if PP gained	HELAA Viability Yield	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
WE4	Land East of Westergate Street (Part of SD5)	Covers part of the Strategic Allocation SD5. The original boundary of the site has been amended to reflect two planning applications that have been received by the council. These are: AL/111/16/OUT for 57 units - Refused Dec 2017 and AL/15/17/PL for 350 units still no decision as at Nov 2018. Yields updated Nov 2018 in accordance with the agents update in Nov 2018. AL/129/18/OUT application submitted Dec 2018 for 55 units. Recent application activity indicates deliverability.	Deliverable	Aldingbourne		Y	AL/15/17/PL			350	0	0	0	0	50	50	50	50	50	50	50	0	0	
WE6A	Ryefield Farmhouse, Oaktree Lane (Part of SD5)	Covers part of the Strategic Allocation SD5. Response July 2018 - same status as deliverable. Application AL/118/18/OUT for 10 dwellings submitted in Nov 18.	Deliverable	Aldingbourne		Y	AL/118/18/OUT			10	0	10	0	0	0	0	0	0	0	0	0	0	0	0
WE6	Ryefield Farm & Woodgate Centre, Oaktree Lane (Part of SD5)	Covers part of the Strategic Allocation site SD5. AL/106/12/ dismissed 60 houses on this site. No recent promotion therefore yields in later part of plan.	Developable	Aldingbourne						134	0	0	0	0	0	0	0	50	50	34	0	0	0	
18AL4	Land at Bridge Cottage and The Old Cottage Lidsey Road (Part of SD5)	The North East half of this site is also covered by the BEW strategic allocation SD5. AL/20/18/OUT Application Refused 13.12.18. Recent activity and promotion indicates deliverability	Deliverable	Aldingbourne			AL/20/18/OUT			25	0	0	25	0	0	0	0	0	0	0	0	0	0	
18EG2	Bexstone House Barnham Road, Eastergate (Part SD5)	June 2018 - new site. Forms part of BEW strategic site SD5. Oct 2018 - EG/49/18/OUT application for demolition and 10 new dwellings withdrawn. Recent promotion indicates deliverability.	Deliverable	Eastergate						17	0	0	0	0	17	0	0	0	0	0	0	0	0	
156	Boweries Barnham Road (Part of SD5)	This site is also covered by strategic allocation SD5 (or BEW). Withdrawn planning application EG/42/18/OUT for 28 dwellings. Recent application activity indicates deliverability.	Deliverable	Eastergate						36	0	0	0	0	36	0	0	0	0	0	0	0	0	
105	Land North of Barnham Road (East of Collins Close) (Part SD5)	Adjoins the site now covered by EG/71/14/OUT. This site part covers strategic allocation site SD5. Deliverability longer term.	Deliverable	Eastergate						95	0	0	0	0	45	50	0	0	0	0	0	0	0	
18EG4	Kinnersley Barnham Road, Eastergate (Part of SD5)	New Submission in 2018. Part of the BEW strategic allocation SD5. Recent promotion indicates deliverability.	Deliverable	Eastergate						7	0	0	0	0	7	0	0	0	0	0	0	0	0	
18EG3	Little Warwick Barnham Road, Eastergate (Part SD5)	Forms part of BEW strategic site SD5. Recent Promotion indicates deliverability.	Deliverable	Eastergate						7	0	0	0	0	7	0	0	0	0	0	0	0	0	
BA11B	Fordingbridge Industrial Site & North of Barnham Road 15 Barnham Road (Part of SD5)	Re-promoted May 2016. Also part of SD5 (NEWEG1).	Deliverable	Eastergate						324	0	0	0	100	80	120	24	0	0	0	0	0	0	

NEWEG1	SD5/BEW site (Barnham Eastergate Westergate)	Main Strategic Allocation site SD5 (3000 in total on site but past the life of this plan) See all the other HELAA sites that coincide with this main site (WE6A, WE6, WE4, 18AL4, 18EG3, BA11B, 18EG2, 156,105, 18EG4) Developer updated trajectory Dec 2018 with 2760 to be provided in plan period.	Deliverable	Eastergate						1755	0	0	0	0	55	100	150	200	250	250	250	250	250
										<b>subtotal</b>	<b>0</b>	<b>10</b>	<b>25</b>	<b>100</b>	<b>297</b>	<b>320</b>	<b>224</b>	<b>300</b>	<b>350</b>	<b>334</b>	<b>300</b>	<b>250</b>	<b>250</b>
NEWA13	Worthing Rugby Club, Roundstone Lane Angmering (SD11)	Strategic Allocation site SD11 - ANGMERING SOUTH AND EAST Recently promoted and are predicting completions will start in 2021. Trajectory updated Dec 2018.	Developable	Angmering						250	0	0	0	0	50	50	50	50	50	0	0	0	0
96A	Land North of Water Lane Angmering (Part SD9)	PART STRATEGIC ALLOCATION SITE ANGMERING NORTH SD9 (See also sub site 96ab for employment allocation site 7) A/40/18/OUT for 175 dwellings still undetermined as at June 2018. Recent application activity indicates deliverability.	Deliverable	Angmering	Y		A/40/18/OUT			525	0	0	0	0	25	100	100	100	100	100	0	0	0
96	Land South of Water Lane Angmering (Part SD9)	PART STRATEGIC ALLOCATION SITE SD9 ANGMERING NORTH FOR EMPLOYMENT AND HOUSING. A/99/17/OUT currently undetermined. Recent application activity indicates deliverability	Deliverable	Angmering	Y		A/99/17/OUT			175	0	0	0	25	50	50	50	0	0	0	0	0	0
109	Land between Arundel Road and Dappers Lane (Part SD9)	Part of SD9 ANGMERING NORTH - See also sites 96 & 96a which also form the North Angmering Broad Location SD9. Recent promotion indicates	Deliverable	Angmering						75	0	0	0	25	25	25	0	0	0	0	0	0	0
										<b>subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>100</b>	<b>175</b>	<b>150</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>0</b>	<b>0</b>
125	SD3 - Land off New Barn Lane/Morells Farm/ Chalcraft Nurseries (Bognor Regis ECO Quarter)	STRATEGIC SITE SD3 WEST OF BERTSTED for 2500 dwellings. See also 18BE2 (BE/77/16/OUT) which has PP for 50 dwellings and 18BE1 for 22 dwellings which have been discounted from this site so as not to double count. Yields adjusted taking into account an update from the promotor Nov 2018.	Deliverable	Bersted						2253	0	53	100	200	200	200	225	225	225	225	200	200	200
18BE1	Land at Chalcraft Cottage Bersted (Part of SD3)	New submission in 2018.Co-incides with the strategic allocation site 125	Deliverable	Bersted						22	0	0	22	0	0	0	0	0	0	0	0	0	0
										<b>subtotal</b>	<b>0</b>	<b>53</b>	<b>122</b>	<b>200</b>	<b>200</b>	<b>200</b>	<b>225</b>	<b>225</b>	<b>225</b>	<b>225</b>	<b>200</b>	<b>200</b>	<b>200</b>
86	Land to the West of Church Lane, South of Horsemere Green Lane & North of Crookthorn Lane (A259) (SD10)	Strategic Allocation Site SD10. Updated with latest planning application CM/1/17/OUT Refused Sept 2017 but won on appeal in September 2018. Trajectory amended as updated information submitted.	Deliverable	Climping	Y		CM/1/17/OUT	01/04/2019	300		0	0	0	0	50	50	50	50	50	50	0	0	0
71	Land at Former Ford Airfield Ford (SD8)	Strategic Allocation Site SD8 FORD Ford NP also allocates 1500 which has now passed referendum in Nov 2018. Yields updated based on recent update from promotor.	Deliverable	Ford						1500	0	0	50	175	175	175	175	175	175	150	150	100	0
NEWLU38	Site at West Bank Littlehampton (LEGA/SD4)	Strategic Allocation site SD4 formally known as LEGA (Littlehampton Economic Growth Area). Yields last amended 25/09/17 to reflect as closely as possible the statements of common ground.	Developable	Littlehampton						1000	0	0	0	0	0	100	125	150	125	125	125	125	125

P15	Land West of Hook Lane (Part of SD2)	Part of Pagham North Allocation SD2 for 800 dwellings (see also 31 & 27). P/6/17/OUT - refused Jan 2019 for 300 dwellings/C2 use/School & D2 uses. Yields amended Nov 2018 based on comments from the promotor Nov 2018 but since it was refused the yields have been put back.	Deliverable	Pagham						300	0	0	0	0	50	50	50	50	50	50	0	0	0	
27	Land to the west of Osborne Refrigeration (Part of SD2)	Part of Strategic Allocation Pagham North (SD2) for 800 dwellings (see 31 & P15 also). Response from Agent in Nov 2018 regarding trajectory. No planning application has been put in for this site.	Deliverable	Pagham						55	0	0	0	0	0	25	30	0	0	0	0	0	0	0
31	Land North of Sefter Road (Part of SD2)	Part of Pagham North Allocation SD2. (See 27 & P15 also). P/134/16/OUT in for 280 dwellings but undetermined as at Nov 2018. Yields amended based on evidence from agent and our own assumptions. Recent application activity indicates deliverability	Deliverable	Pagham		Y	P/134/16/OUT			280	0	0	0	25	25	50	50	50	50	30	0	0	0	
										<b>subtotal</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>75</b>	<b>125</b>	<b>130</b>	<b>100</b>	<b>100</b>	<b>80</b>	<b>0</b>	<b>0</b>	<b>0</b>	
117	Land West of Pagham Road, (SD1)	Strategic Allocation SD1 Pagham South P/140/16/OUT for 400 dwellings 70 bed care home, local centre and provision for primary school 22/11/18 approved Nov 2018 and P/25/17/OUT for 65 dwellings undetermined as at January 2019. Recent application activity indicates deliverability	Deliverable	Pagham	Y		P/140/16/OUT	31/03/2019	465		0	0	0	50	50	50	50	50	50	50	50	50	50	15
NEWY19	Land at Drove Lane, off B2233 Yapton (Part SD7)	Part of Strategic Allocation SD7 YAPTON (see Y11 also). Y/92/17/OUT for 300 dwellings undetermined as at 27/06/18. Scheduled for December 2018 committee. Yields updated in November 2018 based on details supplied by the agent. Recent application activity indicates deliverability	Deliverable	Yapton		Y	Y/92/17/OUT			300	0	0	25	25	25	25	50	25	25	25	25	25	25	25
Y11	Land south of Tack Lee Road Yapton (Part SD7)	Allocation SD7 YAPTON (see NEWY19 also) Polygon amended. EIA Screening Issued July 2017 Current undetermined application Y/91/17/OUT for 250 dwellings. June 2018 - Status same. Recent application activity indicates deliverability	Deliverable	Yapton		Y	Y/91/17/OUT			250	0	0	25	25	25	25	25	25	25	25	25	25	25	0
										<b>subtotal</b>	<b>0</b>	<b>0</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>75</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>50</b>	<b>25</b>
										<b>total</b>	<b>0</b>	<b>63</b>	<b>247</b>	<b>650</b>	<b>1047</b>	<b>1295</b>	<b>1254</b>	<b>1250</b>	<b>1275</b>	<b>1164</b>	<b>875</b>	<b>775</b>	<b>615</b>	

Overall total  
for plan  
period 10510  
5 year total 2007

**Appendix 4 – Deliverable HELAA sites included in the 5 year Supply/Local Plan Trajectory**

Appendix 4 - HELAA Sites included in Trajectory/5 year HLS

Sites included in 5 year HLS

HELAA Ref	Address	Status	Parish	Assessment Type	Existing Use	Viability Yield	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Comments	
82A	St Denys Nurseries (south), Dappers Lane	Deliverable	Angmering	Residential	Greenfield	18	0	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0	Last promoted as deliverable in 2017 - but later in five year period.
82B	St Denys North Dappers Lane	Deliverable	Angmering	Residential	Greenfield	22	0	0	22	0	0	0	0	0	0	0	0	0	0	0	0	0	Last promoted as deliverable in 2017 - but later in five year period.
82C	Broadlees, Dappers Lane	Deliverable	Angmering	Mixed Use	Residential	51	0	0	0	51	0	0	0	0	0	0	0	0	0	0	0	0	Recent planning permission A/114/18/PL promotes deliverability for extra care apartments and nursing home.
18BR2	Richmond Arms 224 London Road	Deliverable	Bognor Regis	Residential	Brownfield (PDL)	10	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	BR/142/18/OUT approved January 2019 for demolition and conversion to form 10 residential units. Will show under commitments in 2019.
BR1913	Ockley House 6 Ockley Road	Deliverable	Bognor Regis	Residential	Residential	8	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0	Previous application shows deliverability for 8 flats but not promoted this year.
BR19811	Westside Supplies, 17-18 Durban Road	Deliverable	Bognor Regis	Residential	Brownfield (PDL)	14	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	April 2019 - BR/90/18/PL approved PP for 8 No. 1 bed flats and 6 No. 2 bed flats will show under commitments in 2019.
BR23911	The Beach The Esplanade	Deliverable	Bognor Regis	Mixed Use	Brownfield (PDL)	49	0	0	49	0	0	0	0	0	0	0	0	0	0	0	0	0	Expected application in 2019 - for approx. 49 units with commercial underneath.
NEWBR1	Land adjoining Gordon Avenue West	Deliverable	Bognor Regis	Residential	Amenity	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	Promoted July 2018.
18FP1	Land at Stanhorn Grove Felpham	Deliverable	Felpham	Residential	Greenfield	13	0	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Planning permission FP/171/18/PL now gained for 18 dwellings in February 2019. Will show as a commitment in 2019.
18FG1	144 - 148 Littlehampton Road Ferring	Deliverable	Ferring	Residential	Residential	18	0	0	0	0	18	0	0	0	0	0	0	0	0	0	0	0	New submission. 3 detached houses adjacent to site FG20. New 2018 submission.
FG17	Grange House and Mullbery, Church Lane	Deliverable	Ferring	Residential	Residential	10	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0	Considered deliverable as both owners confirmed interest in bringing site forward in the 2018 update. Site within residential community in a suitable location.
LU12A	Land North of Littlehampton Academy Daisyfields Caravan Site	Deliverable	Littlehampton	Residential	Greenfield	62	0	0	0	25	37	0	0	0	0	0	0	0	0	0	0	0	LU/330/18/PL undecided - Demolition of existing buildings & the erection of 77 residential homes
LU12B	Land North of Littlehampton Academy West of Oakcroft Gardens	Deliverable	Littlehampton	Residential	Greenfield	52	0	0	0	25	27	0	0	0	0	0	0	0	0	0	0	0	Suitable site more likely to come forward towards the end of five year period.
LU18A	Toddington Farm (Land North & West of 1-3 Toddington Farm Cottages)	Deliverable	Littlehampton	Residential	Other	13	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	LU/162/17/PL won on appeal - January 2019. Will be under commitments in 2019.
LU33A	Meadowfield House	Deliverable	Littlehampton	Mixed Use	Brownfield (PDL)	12	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	Suitable site more likely to come forward towards the end of five year period.

17M1	The Cabin Elmer Road	Deliverable	Middleton	Residential	Brownfield (PDL)	5	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0	0	Suitable site more likely to come forward towards the end of five year period.
M4	Car park (The Cabin), Elmer Road	Deliverable	Middleton	Residential	Car Park	6	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	0	Promoted in 2017
78	Clock House and Surrounding Area	Deliverable	Rustington	Residential	Residential	13	0	0	0	0	13	0	0	0	0	0	0	0	0	0	0	0	Last promoted as deliverable in 2017 - but later in five year period.
RU6	Fitzalan Road West, Arundel	Developable	Arundel	Mixed Use	Industrial	8	0	0	0	0	0	0	0	0	8	0	0	0	0	0	0	0	Potentially available later in plan period.
BR10	Covers Richmond Road	Developable	Bognor Regis	Residential	Brownfield (PDL)	33	0	0	0	0	0	0	0	0	0	0	0	0	0	33	0	0	The site will not be available until the current business can relocate elsewhere. Status changed from deliverable and in 5yHLS to developable much later on in the plan
BR12	Car Park at London Road	Developable	Bognor Regis	Residential	Car Park	20	0	0	0	0	0	20	0	0	0	0	0	0	0	0	0	0	Potentially available later in plan period.
BR19	Regis Centre Site, The Esplanade	Developable	Bognor Regis	Residential	Brownfield (PDL)	95	0	0	0	0	0	45	50	0	0	0	0	0	0	0	0	0	Potentially available later in plan period.
BR5	Hothampton Car Park The Queensway	Developable	Bognor Regis	Residential	Car Park	80	0	0	0	0	0	50	30	0	0	0	0	0	0	0	0	0	Potentially available later in plan period.
140	Land to the rear of Malvern Croft/Lavender Lodge	Developable	Eastergate	Residential	Residential	6	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	Potentially available later in plan period.
BA10	Penfold Metallising Co Ltd Barnham Road	Developable	Eastergate	Mixed Use	Brownfield (PDL)	6	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	Potentially available later in plan period.
EG4412	Land to the rear of 43, 45 & 47 Barnham Road barnham	Developable	Eastergate	Residential	Brownfield (PDL)	11	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	Potentially available later in plan period.
NEWLU38	Works units at Gloucester Road and Howard Road	Developable	Littlehampton	Mixed Use	Industrial	14	0	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	Potentially to be available later in plan period.
PS12	St Martins Car Park & Former Waitrose	Developable	Littlehampton	Mixed Use	Car Park	70	0	0	0	0	0	0	25	25	20	0	0	0	0	0	0	0	LU/3/19/PL redevelopment of site - 83 residential units, A1, A2, A3 and D1 application Jan 2019 pending.
FP20	86 Middleton Road	Developable	Middleton	Residential	Residential	6	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0	0	Potentially available later in plan period.
P5408	St Ninians Church	Developable	Pagham	Residential	Amenity	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0	Potentially available later in plan period.
R5111	2 & 4 Broadmark Lane & 18 Vernon Close	Developable	Rustington	Residential	Residential	7	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	Potentially available later in plan period.
WA2	Land at Dower House, Parsons Walk	Developable	Walberton	Residential	Residential	10	0	0	0	0	0	0	0	0	0	10	0	0	0	0	0	0	Potentially available later in plan period.
						<b>762</b>	<b>0</b>	<b>23</b>	<b>101</b>	<b>121</b>	<b>142</b>	<b>132</b>	<b>105</b>	<b>31</b>	<b>28</b>	<b>23</b>	<b>14</b>	<b>0</b>	<b>33</b>	<b>9</b>	<b>0</b>		

387 = 5 year supply (less 10% = 348)

## **Chapter 5: Housing Delivery Tables**

*Sets out dwelling completion data showing proportion built on brownfield land and numbers built as affordable homes.*

Appendix 5 - Neighbourhood Plan Sites Included in Trajectory / 5 year HLS

Sites Included in 5 year HLS

HELAA Ref	Address	Status	Parish	Assessment Type	Existing Use	Committed Yield (if ICE what's left to build)	Viability Yield	Losses	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Latest Status Comments	
A1513	Chandlers BMW Site, Water Lane	Deliverable	Angmering	Residential	Brownfield (PDL)		18		0	0	0	0	18	0	0	0	0	0	0	0	0	0	0	0	Promoted in 2017
A1	Mayflower Way (South of)	Deliverable	Angmering	Residential	Greenfield	12			0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	A/219/17/PL for 12 Social Dwellings approved Oct 2018. Recent application activity indicates deliverability.
101	Shrublands Nursery Mayflower Way/Roundstone Lane	Deliverable	Angmering	Residential	Brownfield (PDL)		71		0	0	0	25	25	21	0	0	0	0	0	0	0	0	0	0	Site promoted for development in 2017.
RU7	Blastreet, Fitzalan Road	Deliverable	Arundel	Residential	Industrial		17	1	0	0	0	0	17	0	0	0	0	0	0	0	0	0	0	0	Nothing insurmountable to stop it coming forward within 5 years although AB/36/18/PL Refused 30.11.18. Application activity indicates deliverability.
AB10	Greenhurst, Fitzalan Road	Deliverable	Arundel	Residential	Residential		10	1	0	0	0	0	10	0	0	0	0	0	0	0	0	0	0	0	Site may come forward in next five years. Planning application AB/36/18/PL refused for 46 shletered appartments for the elderly Nov 2018. Recent application activity indicates site is still deliverable.
NEWBE10	Bartons County Infants School Romney Broadwalk	Deliverable	Bersted	Residential	Brownfield (PDL)		16		0	0	0	0	16	0	0	0	0	0	0	0	0	0	0	0	Appears unavailable for dwellings at present as recent application BE/67/18/PL for use as a school until 31st Sept 2019. Considered developable
BE113	Land adjacent to Tesco Express (Former site of The Rising Sun) 351 Chichester Road	Deliverable	Bersted	Residential	Car Park		7		0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	Site last promoted in 2016
NEWFG2	Land Rear of Henty Arms, Ferring Lane	Deliverable	Ferring	Residential	Industrial		25		0	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0	Considered a longer term - developable site
LU33	Patterson Wilson Road	Deliverable	Littlehampton	Mixed Use	Brownfield (PDL)		15		0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	Last promoted in 2017
LU12	North of the Littlehampton Academy South of Cornfield Close	Deliverable	Littlehampton	Residential	Amenity		100		0	0	0	50	50	0	0	0	0	0	0	0	0	0	0	0	2018 response - being developed for 77 houses with LU12a, will come forward in next 5 years.
HP3	S & G Motors, Arundel Road	Deliverable	Walberton	Residential	Brownfield (PDL)		27		0	0	0	8	12	7	0	0	0	0	0	0	0	0	0	0	Site is deliverable - application may come forward shortly in plan period.
133	Land to Rear of Woodcroft, West Walberton Lane	Deliverable	Walberton	Residential	Greenfield		31		0	0	0	31	0	0	0	0	0	0	0	0	0	0	0	0	Site promoted for development in January 2019 - recent activity shows deliverability.





## **Chapter 6: Commercial Land Delivery**

*Sets out the amount of employment floor space available and built*

## Appendix 6 - Small site completions, losses and windfall calculations

### 2018 RLA Small site calculator <6 dwelling threshold (excluding SDNP)

Site Type	Units	Year 1	Year 2	Year 3	Year 4	Year 5	Total	Overall % Projection
Commenced	151	75.5	45.3	30.2	0	0	151	
Full	261	39.15	39.15	26.1	13.05	0	117.45	
Outline	51	0	10.2	5.1	5.1	2.55	22.95	
<b>TOTAL</b>	<b>463</b>	<b>114.65</b>	<b>94.65</b>	<b>61.4</b>	<b>18.15</b>	<b>2.55</b>	<b>291.4</b>	<b>62.9%</b>
Losses (Demolitions)	46	5.77	7.28	4.6	2.68	0.38	20.7	
Net	417	109	87	57	15	2	271	
<b>Windfall balance</b>		<b>0</b>	<b>0</b>	<b>19</b>	<b>60</b>	<b>74</b>	<b>153</b>	

Windfall balance = 76 minus Total , unless total>76

Windfall Calculation Excluding Gardens	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	Average
Small Sites Net	147	77	74	69	123	82	98	58	36	68	66	74	19	77	76

### 2018 RLA - Calculation of projected losses on small identified sites

#### Excluding SDNP sites from individual Districts & Boroughs

Losses have already taken place on any site with a start date.

Therefore, potential losses only arise from sites without a start date.

The number of losses expected is derived by taking 45% of the total potential losses on unstarted permissions.

District	Potential losses	Expected losses		Projected gross completions on unstarted small sites						Associated losses on unstarted small sites					Projected net completions on unstarted small sites						
		Unrounded	Rounded	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Total	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Total	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Total
Arun	46	20.70	21.00	39.15	49.35	31.20	18.15	2.55	140.40	5.77	7.28	4.60	2.68	0.38	20.70	33.38	42.07	26.60	15.47	2.17	119.70

Commitments as at 31/03/2018

Data Extracted on 17/11/2018

Ian Hayward  
 Planning Services  
 Economy Infrastructure and Environment Directorate  
 West Sussex County Council

## Appendix 7 – Local Plan Trajectory

**Appendix 7 - Housing Trajectory (Updated May 2019).**

Net Completions	Years 1-5						Years 6-10					Years 11-15					Years 16-20				
	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/17	2017/2018														
<b>TOTAL</b>	<b>4,373</b>	<b>722</b>	<b>475</b>	<b>359</b>	<b>601</b>	<b>890</b>	<b>622</b>	<b>704</b>													
Future Housing Supply																					
	Total	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031
Commitments / Large Sites with Planning Permission (net) (Includes Strategic Allocations with PP as at 31st March 2018)	4,024								456	405	1421	619	188	151	209	170	120	120	120	45	0
Made Neighbourhood Plan allocations*	531								0	25	25	146	195	45	14	25	19	0	0	37	0
HELAA sites (Inside Built Up Area)	762								0	23	101	121	142	132	105	31	28	23	14	0	42
<b>Sub Total</b>	<b>5,317</b>								<b>456</b>	<b>453</b>	<b>1547</b>	<b>886</b>	<b>525</b>	<b>328</b>	<b>328</b>	<b>226</b>	<b>167</b>	<b>143</b>	<b>134</b>	<b>82</b>	<b>42</b>
10% slippage / non-implementation rate	532								46	45	155	89	53	33	33	23	17	14	13	8	4
<b>Sub Total</b>	<b>4,785</b>								<b>410</b>	<b>408</b>	<b>1392</b>	<b>797</b>	<b>473</b>	<b>295</b>	<b>295</b>	<b>203</b>	<b>150</b>	<b>129</b>	<b>121</b>	<b>74</b>	<b>38</b>
Small site commitments	271								109	87	57	15	2	0	0	0	0	0	0	0	0
Windfall	761								0	0	19	60	74	76	76	76	76	76	76	76	76
<b>TOTAL</b>	<b>5,841</b>								<b>519</b>	<b>495</b>	<b>1468</b>	<b>873</b>	<b>549</b>	<b>371</b>	<b>371</b>	<b>279</b>	<b>226</b>	<b>205</b>	<b>197</b>	<b>150</b>	<b>114</b>
Strategic Allocation Sites*																					
	Total	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031
Pagham South (SD1)	465								0	0	0	50	50	50	50	50	50	50	50	50	15
Pagham North (SD2)	635								0	0	0	25	75	125	130	100	100	80	0	0	0
West of Bersted(SD3)	2,275								0	53	122	200	200	200	225	225	225	225	200	200	200
BEW (SD5)	2,760								0	10	25	100	297	320	224	300	350	334	300	250	250
Yapton (SD7)	550								0	0	50	50	50	50	75	50	50	50	50	50	25
Ford (SD8)	1,500								0	0	50	175	175	175	175	175	175	150	150	100	0
LEGA (SD4)	1,000								0	0	0	0	0	100	125	150	125	125	125	125	125
Angmering North (SD9)	775								0	0	0	50	100	175	150	100	100	100	0	0	0
Angmering South and East (SD11)	250								0	0	0	0	50	50	50	50	50	0	0	0	0
Climping (SD10)	300								0	0	0	0	50	50	50	50	50	50	0	0	0
<b>TOTAL</b>	<b>10,510</b>								<b>0</b>	<b>63</b>	<b>247</b>	<b>650</b>	<b>1047</b>	<b>1295</b>	<b>1254</b>	<b>1250</b>	<b>1275</b>	<b>1164</b>	<b>875</b>	<b>775</b>	<b>615</b>
Future small sites allowance																					
	Total	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031
Small Sites DPD / Neighbourhood Plans	1,250								0	0	0	0	0	100	100	100	150	200	200	200	200
Annualised Requirement																					
		610	610	610	610	610	930	930	930	930	930	1310	1310	1310	1310	1310	960	960	960	960	960
<b>TOTAL SUPPLY</b>	<b>21,974</b>	<b>722</b>	<b>475</b>	<b>359</b>	<b>601</b>	<b>890</b>	<b>622</b>	<b>704</b>	<b>519</b>	<b>558</b>	<b>1,715</b>	<b>1,523</b>	<b>1,596</b>	<b>1,766</b>	<b>1,725</b>	<b>1,629</b>	<b>1,651</b>	<b>1,569</b>	<b>1,272</b>	<b>1,125</b>	<b>929</b>

## Chapter 5 - Housing Delivery

The table below shows the planned housing targets to 2031

<b>H1 Plan period and Housing Targets</b>	
Housing target	2011 - 2031
	20,000

**H2(a): Net additional dwellings in previous years**

**H2(b): Net additional dwellings for the reporting year**

**H3: New and converted dwellings on previously developed land**

<b>H2(a),H2(b) and H3 Indicators</b>		<b>H2 (a&amp;b)</b>	<b>H3</b>
Year	Dwelling Completions		Brownfield Total
	Gross	Net	(Included in Gross Completions)
2011-12	748	722	378 (51%)
2012-13	499	475	136 (27%)
2013-14	384	359	210 (55%)
2014-15	642	601	286 (45%)
2015-16	912	890	284 (31%)
2016-17	659	616	201 (31%)
2017-18	731	704	421 (58%)
<b>Total</b>	<b>4,575</b>	<b>4,367</b>	<b>1916</b>

### Affordable Dwellings Delivered and Total Dwellings delivered

Year Ended	Affordable dwellings (net)	Total dwellings (net)	% of Total Dwellings
31st March 2012	280	722	39%
31st March 2013	164	475	35%
31st March 2014	30	359	8%
31st March 2015	128	601	21%
31st March 2016	166	890	19%
31st March 2017	102	616	17%
31st March 2018	104	704	15%

### H5 Affordable Housing Completions per parish 2018

Area Name	Gross Built	Net Built
Aldingbourne	1	1
Angmering	31	31
Barnham	23	23
Bognor Regis	5	5
Ferring	4	4
Littlehampton	40	40
<b>Grand Total</b>	<b>104</b>	<b>104</b>

### Summary of all dwellings delivered 2018 by Parish

Arun District Ward/Parish	Gross Dwelling Completions 2017/18	Net Dwelling Completions 2017/18
Aldingbourne	15	14
Aldwick	7	7
Angmering	126	126
Arundel	8	7
Barnham	71	69
Bersted	49	48
Bognor Regis	85	83
Climping	0	0
East Preston	16	14
Eastergate	1	1
Felpham	64	63
Ferring	48	47
Ford	0	0
Kingston	2	1
Littlehampton	190	190
Lyminster	0	-1
Middleton on Sea	9	3
Pagham	4	1
Rustington	17	17
Walberton	8	6
Yapton	8	8
<b>Grand Total</b>	<b>728</b>	<b>704</b>

## **Chapter 6 - Employment Floorspace Provision and Availability**

The tables below show how much employment floorspace is available as at 31st March 2018

### **Total amount of additional available employment floorspace**

It also shows how much employment use land is available (or is currently under construction). Retail, leisure or hotel uses have not been included.

Year Ended	Gross Additional Employment Floorspace (sq Meters)	Net Additional Employment Floorspace (sq Meters)
31st March 2012	3,595	3,217
31st March 2013	3,165	1,163
31st March 2014	2,350	1,490
31st March 2015	20,594	16,775
31st March 2016	25,651	17,293
31st March 2017	77,714	74,687
<b>31st March 2018</b>	<b>118,641</b>	<b>118,558</b>

**There has been a net gain of 43870 sq metres of Employment use floor space available. This is due mainly to the adopted Strategic Allocations Site 1 Salt Box, Bersted and Strategic Allocation 3 - Oldlands Farm.**

### **BD1: Total amount of Additional employment floorspace occupied by use class**

Employment Floorspace Type is defined by Use Class Orders B1 (a), B1 (b), B1 (c), B2 and B8  
 Floorspace is completed when Occupied and Completed and available for use

Floor Space Type	Gross Additional Employment Floorspace (sq Meters)	Employment Floorspace Lost (sq Meters)	Net Additional Employment Floorspace (sq Meters)	Site area (Ha)
B1a: Offices	55	55	0	0.01
B1c: Light Industry	400	0	400	0.04
B2: General Industry	3000	0	3000	0.3
B8: Storage & Distribution	2580	0	2580	0.35
<b>Grand Total</b>	<b>6035</b>	<b>55</b>	<b>5980</b>	<b>0.7</b>

### **BD2: Total amount of employment floorspace occupied on previously developed Land by use class**

This Indicator Should only count that employment floorspace of the total gross identified in BD1, which is on PDL



Floor Space Type	Gross Additional Employment Floorspace (sq Meters)	Employment Floorspace Lost (sq Meters)	Net Additional Employment Floorspace (sq Meters)	Site area (Ha)
B1a: Offices	55	55	0	0.01
B1c: Light Industry	400	0	400	0.04
B2: General Industry	0	0	0	0
B8: Storage & Distribution	0	0	0	0
<b>Grand Total</b>	<b>455</b>	<b>55</b>	<b>400</b>	<b>0.05</b>

**BD3: Employment land available by use class**

Employment Floorspace Type is defined by Use Class Orders B1 (a), B1 (b), B1 (c), B2 and B8  
This includes available sites, sites with planning permission and sites under construction

Floor Space Type	Gross Floorspace (sq Meters)	Floorspace Lost (sq Meters)	Net Floorspace (sq Meters)	Site area (Ha)
B1: Mixed uses	97132.2	60.2	97072	181.97
B1a: Offices	6248.5	185.55	6062.95	20.17
B1c: Light Industry	1705	0	1705	1.34
B2: General Industry	37601	1039.4	36561.6	10.36
B8: Storage & Distribution	28185.8	83	28102.8	46.52
<b>Grand Total</b>	<b>170872.5</b>	<b>1368.15</b>	<b>169504.35</b>	<b>260.36</b>

**BD4: Total amount of Completed and Occupied floorspace for Town Centre & Leisure use**

This includes uses defined as use class orders A1, A2, B1a and D2  
Completed floorspace for Town centres

Floor Space Type	Gross Floorspace (sq Meters)	Floorspace Lost (sq Meters)	Net Floorspace (sq Meters)	Site area (Ha)
A1: Retailing, B1a: Offices, D2: Leisure	0	0	0	0
<b>Grand Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

None has been completed or occupied in this monitoring year but there is 21121 sq m available

## Chapter 7: Gypsy and Traveller Sites Provision

### Gypsy and Traveller and Travelling Showpeople

- 1.1 A revised Planning Policy for Traveller Sites (PPTS 2015) was published in August 2015 and requires that local planning authorities set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities. Using the target figures, the PPTS 2015 requires that local planning authorities identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites. A supply of specific developable sites or broad locations for growth should be identified for years 6 to 10 and where possible for years 11-15.
- 1.2 The Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) was commissioned jointly by Arun District Council, Adur District and Worthing Borough Councils, Chichester District Council and the South Downs National Park Authority. The GTAA was published in April 2013. An update was published in May 2015 (Report dated December 2014). This report provided amendments to Gypsy and Traveller requirements only.
- 1.3 The GTAA 2015 is currently being revised, to include the change in the planning definition of a Traveller. This work includes various stages and is being done jointly with our neighbouring authorities. The draft report has been published and the final report is anticipated later in 2018.
- 1.4 Arun will also commission consultants in summer 2018 to assess sites for Gypsy and Traveller and Travelling Showpeople (G&T) as part of a G&T sites Identification Study which will be used to inform the preparation of the G&T Development Plan Document (DPD). It includes a similar process of identifying sites and consultation etc. and will also be subject to Sustainability Appraisal so that the consequent allocation would be a sustainable and equitable approach to that taken for the settled population's housing need.
- 1.5 Prior to the adoption of the DPD, the council is committed to ensuring that adequate provision is made for the travelling community in the short term through the development management process. The Council considers that the Arun Local Plan (adopted in July 2018) Policy H SP5 and criterion for determining planning applications, provides a sound basis for planning decisions and allowing further pitch provision until the G&T DPD can be finalised and adopted.
- 1.6 The targets set out in the Local Plan for Gypsies and Travellers are separated into public and private in order to ensure that the range of accommodation needs for that community can be met through the planning process. Tables 12.5 & 12.6 of the Local Plan sets out the provision needed based on the GTAA 2015 but will be updated as part of the GTAA 2018 using the new planning definition of a Traveller households set out in the PPTS 2015..

- 1.7 It is worth noting that in March 2015 a transit site in Westhampnett, Chichester opened to provide nine short-stay pitches, toilet and shower facilities and an office for the manager of the site. This was delivered by Chichester District Council through joint working with Arun and other district and Borough Councils across West Sussex and other groups.

## 2. **GTAA 2018 UPDATE**

- 2.1 The draft GTAA 2018 is being progressed as a joint piece of work with the coastal West Sussex Authorities. The GTAA 2018 assessment assumes that supply and demand for the period 2012-2017 net to zero based on identified need and supply. The GTAA assessment then starts from a new 2018 baseline which identifies all current and future need as of January 2018 and rolls forward the assessment period by 5 years from 2031 to 2036. On this basis, there is no unmet need to provide for. The baseline date for the study is January 2018 which was when the majority of the site interviews were completed.

### 2.2 **Pitch Needs – Gypsies and Travellers that meet the Planning Definition**

In summary, there is a need for 9 additional pitches in Arun over the GTAA period to 2036 for Gypsy and Traveller households that met the planning definition; a need for up to 3 additional pitches for unknown Gypsy and Traveller households that may meet the planning definition. For information the GTAA 2018 identifies 13 Gypsy and Traveller households which did not meet the planning definition. This data will be used to inform the Arun Local Plan and other DPD preparation and the approach to meeting the special and cultural needs of the population.

### 2.3 **Plot Needs – Travelling Showpeople**

In summary there is a need for 14 additional plots in Arun over the GTAA period to 2036 for Travelling Showpeople households; a need for up to 1 additional plot for unknown Travelling Showpeople households that may meet the planning definition.

- 2.4 The site methodology and assessment work as part of the G&T DPD, commenced in 2018 with a further call for Gypsy and Traveller sites ended on 31<sup>st</sup> October 2018.



# Biodiversity Annual Monitoring Report

**Arun District**

**1<sup>st</sup> April 2017 – 31<sup>st</sup> March 2018**

Report ref: SxBRC/18/568

31/10/2018



# Biodiversity Annual Monitoring Report

## Introduction

The Biodiversity Annual Monitoring Report (AMR) is a product provided by the Sussex Biodiversity Record Centre (SxBRC) to all local authorities in East and West Sussex on a yearly basis. It is a retrospective look at the potential impacts on biodiversity of approved planning applications for the financial year.

### Why this data matters

The Natural Environment and Rural Communities Act 2006 aims to make biodiversity a central consideration in policy and decision making processes, by placing a legal duty in Section 40 on every public body in exercising its functions, [to] "...have regard...to the purpose of conserving biodiversity." There is an expectation that public bodies when complying with this duty will refer to the list of habitats and species of principal importance in England (Section 41 list). These habitats and species should be treated as material considerations when making planning decisions.

It is also cemented in the National Planning Policy Framework (NPPF) that the planning system has an environmental role to play that is fundamental to achieving sustainable development. In particular the planning system should:

- Provide net gains in biodiversity (9, 109)
- Plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (114)
- Promote the preservation, restoration and recreation of priority habitats, species and ecological networks (117)
- Identify suitable ways of monitoring biodiversity in local plans (117)
- Base planning decisions on detailed, up-to-date environmental information (158, 192)

The information in this report will help to assess how the local authority is performing at these duties.

## SPECIES DATA

Table 3 provides the number of planning applications where designated species data exists within a 200 metre buffer. All species data is from 1980 onwards. The species data are grouped as follows:

### European Protected Species (EPS)

The list of European Protected Species is taken from Schedule 2 and Schedule 4 of the Conservation (Natural Habitats &c.) Regulations 1994. It is an offence to deliberately kill, capture, or disturb a European Protected Species, or to damage or destroy the breeding site or resting place of such a species.

***Otter records are not included in this report.***

A list of European Protected Species can be found here: <http://naturenet.net/law/europe.html>

### Wildlife & Countryside Act (1981) Species

Species included in Table 3 of the Biodiversity AMR are from the following Schedules/Parts of the Act:

#### Schedule 5 - Wild Animals

- Section 9 Part 1: intentional killing, injuring, taking

- Section 9 Part 4(a): damage to, destruction of, obstruction of access to any structure or place used by a scheduled animal for shelter or protection
- Section 9 Part 4(b): disturbance of animal occupying such a structure or place

A list of Schedule 5 species can be found here: <http://naturenet.net/law/sched5.html>

### Schedule 8 - Plants

A list of Schedule 8 species can be found here: <http://naturenet.net/law/sched8.html>

## Section 41 (S41) Species

Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act 2006 requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England.

The S41 list is used to guide decision-makers in implementing their duty under section 40 of the Act, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

More details about the NERC Act can be found here: <http://bit.ly/1Nedj7X>

## Bats

Bats are protected by European and UK legislation. It is an offence to:

- Deliberately capture, injure or kill a bat
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)
- Intentionally or recklessly obstruct access to a bat roost
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat

## Notable Birds

The list of 'Notable Birds' has been devised by the SxBRC in collaboration with the Sussex Ornithological Society (SOS). It consists of bird species that are particularly scarce or vulnerable to development in Sussex. The full list can be seen at the end of this report.

## Rare Species

These species are from the Rare Species Inventory (RSI) devised by the SxBRC in collaboration with local experts. The list contains over 3,400 species, selected on the following criteria:

- All species in the British Red Data Books including all Notable fauna and Nationally Scarce flora and British endemic taxa which have ever occurred in Sussex whether extinct or not.
- Species included in the UK Biodiversity Action Plan (BAP species).
- Internationally rare taxa cited in the Bern Convention, IUCN Red Data lists, or EU Habitats Directive which are not covered by any of the above.
- County rarities.

***Bat and bird records are not included in the RSI.***

## **Invasive Non-Native Species (INNS)**

An invasive non-native is defined as a species whose introduction and/or spread threatens biological diversity. Section 14 of the WCA (1981) is the principal legislation dealing with the release of non-native species. The list of INNS used in Sussex includes all those listed in Schedule 9 of the WCA and 26 other species not in this Schedule but which pose a particular risk in Sussex. A list of these additional species can be found at the end of this report.

***Bird records are not included in the list of invasive non-native species used in this report.***

## **Ancient & Veteran Trees**

These records are from the Ancient Tree Hunt (a national survey carried out in 2007/2008) and Tree Register of the British Isles (a charity which collates and updates data on notable trees).

## **Black Poplars**

The black poplar is naturally a tree of wet woodland and forested floodplains. Much black poplar habitat has been drained and cleared in the past, and there are now under 50 mature trees remaining in Sussex.

Arun District area (ha)	22444.08	Area of approved planning applications (ha)	467.58	(121 applications)
West Sussex area (ha)	202361.68	% of Arun District infringed by planning applications	2.08	

Table 1. Designated sites and reserves		Area of designation / reserve in West Sussex (ha)	% of West Sussex	Area of designation / reserve in Arun District (ha)	% of Arun District	Area of designation / reserve in Arun District infringed by planning applications (ha)	% of designation / reserve in Arun District infringed by planning applications	Number of planning applications within or abutting designation / reserve
Inter-national	Ramsar	3724.95	1.84	134.11	0.60	0.00	0.00	0
	Special Area of Conservation (SAC)	3671.02	1.81	0.00	0.00	0.00	0.00	0
	Special Protection Area (SPA)	3746.33	1.85	134.11	0.60	0.00	0.00	0
National	Area of Outstanding Natural Beauty (AONB)	25956.05	12.83	0.00	0.00	0.00	0.00	0
	National Nature Reserve (NNR)	221.75	0.11	0.00	0.00	0.00	0.00	0
	National Park	81247.97	40.15	10324.79	46.00	0.13	0.00	2
	Site of Special Scientific Interest (SSSI)	8310.00	4.11	447.53	1.99	0.00	0.00	0
Local	Country Park	320.52	0.16	0.00	0.00	0.00	0.00	0
	Local Geological Site (LGS)	1573.99	0.78	212.73	0.95	0.00	0.00	0
	Local Nature Reserve (LNR)	2046.86	1.01	218.26	0.97	0.00	0.00	0
	Local Wildlife Site (LWS)	10569.16	5.22	1696.26	7.56	0.00	0.00	0
	Notable Road Verge	136.91	0.07	10.06	0.04	0.00	0.00	0
Reserve/ Property	Environmental Stewardship Agreement *	40507.21	20.02	4321.06	19.25	0.00	0.00	0
	National Trust	5065.97	2.50	1153.97	5.14	0.00	0.00	0
	RSPB Reserve	1367.50	0.68	22.73	0.10	0.00	0.00	0
	Sussex Wildlife Trust Reserve	742.61	0.37	0.00	0.00	0.00	0.00	0
	Woodland Trust	67.89	0.03	13.28	0.06	0.00	0.00	0

\* This only applies to 'live' Environmental Stewardship Agreements. Environmental Stewardship Agreements include: Entry Level Stewardship, Entry Level plus Higher Level Stewardship, Higher Level Stewardship, Organic Entry Level plus Higher Level Stewardship and Organic Entry Level Stewardship.

All statistics are based on information held at the Sussex Biodiversity Record Centre as at 01/10/18. Note that designated sites may overlap therefore the totals shown in the designated site table do not necessarily reflect the total percentage of the district covered by designated sites. Please inform us if you believe the data shown to be inaccurate.



<b>Table 2. Habitats *</b>	<b>Area of habitat in West Sussex (ha)</b>	<b>% of West Sussex</b>	<b>Area of habitat in Arun District (ha)</b>	<b>% of Arun District</b>	<b>Area of habitat in Arun District infringed by planning applications (ha)</b>	<b>% of habitat in Arun District infringed by planning applications</b>	<b>Number of planning applications within or abutting habitat</b>
Ancient woodland	21377.16	10.56	1999.10	8.91	0.00	0.00	0
Coastal & floodplain grazing marsh	4389.36	2.17	1092.15	4.87	26.38	2.42	2
Coastal saltmarsh	357.04	0.18	10.16	0.05	0.00	0.00	0
Coastal sand dunes	31.52	0.02	10.53	0.05	0.00	0.00	0
Coastal vegetated shingle	124.93	0.06	60.78	0.27	0.00	0.00	0
Deciduous woodland	30111.06	14.88	2671.36	11.90	1.19	0.04	6
Ghyll woodland	1992.75	0.98	0.00	0.00	0.00	0.00	0
Intertidal chalk	0.00	0.00	0.00	0.00	0.00	0.00	0
Intertidal mudflat	1758.88	0.87	126.81	0.56	0.00	0.00	0
Lowland calcareous grassland	2736.04	1.35	440.73	1.96	0.00	0.00	0
Lowland fen	194.74	0.10	20.76	0.09	0.00	0.00	0
Lowland heathland	1506.50	0.74	2.56	0.01	0.00	0.00	0
Lowland meadow	193.42	0.10	13.68	0.06	0.00	0.00	0
Maritime cliff and slope	0.00	0.00	0.00	0.00	0.00	0.00	0
Reef bed	60.11	0.03	11.45	0.05	0.00	0.00	0
Salt lagoon	44.16	0.02	10.66	0.05	0.00	0.00	0
Traditional orchard	139.66	0.07	23.54	0.10	9.43	40.03	1
Wood-pasture & parkland	7057.91	3.49	1062.24	4.73	0.01	0.00	1

<b>Table 3. Species Data # (1980 onwards)</b>	<b>Number of records in West Sussex</b>	<b>Number of records in Arun District</b>	<b>No. of planning applications with species records within 200m buffer</b>	<b>% of planning applications with species records within 200m buffer</b>
European Protected species	15299	1565	71	58.68
Wildlife & Countryside Act species	30975	4040	100	82.64
Section 41 species	301976	46196	121	100.00
Bats	11670	887	68	56.20
Notable birds	118774	18270	112	92.56
Rare species (excludes bats and birds)	49073	7774	97	80.17
Invasive non-native species	10848	726	67	55.37
Ancient Tree Hunt	1002	48	8	6.61
Tree Register	378	10	6	4.96
Black Poplar	17	4	0	0.00

\* Changes in habitat extent year on year may well be a reflection of improved datasets and should not be assumed to be habitat expansion or contraction. Many habitat datasets overlap with one another, e.g. lowland meadow may be classed as grazing marsh and recorded in both inventories. #Badger and otter records are not included. Rare species does not include bat or bird records. Some species appear in more than one category. The Sussex Notable Bird Inventory is based on a list of species that are particularly scarce or vulnerable to development in Sussex. Please see species list at end of report for more information. Ancient Tree Hunt and Tree Register of the British Isles datasets include a degree of overlap (i.e. on occasion the same tree may be recorded in both datasets).

**Planning applications within or abutting designated site, reserve or habitat**

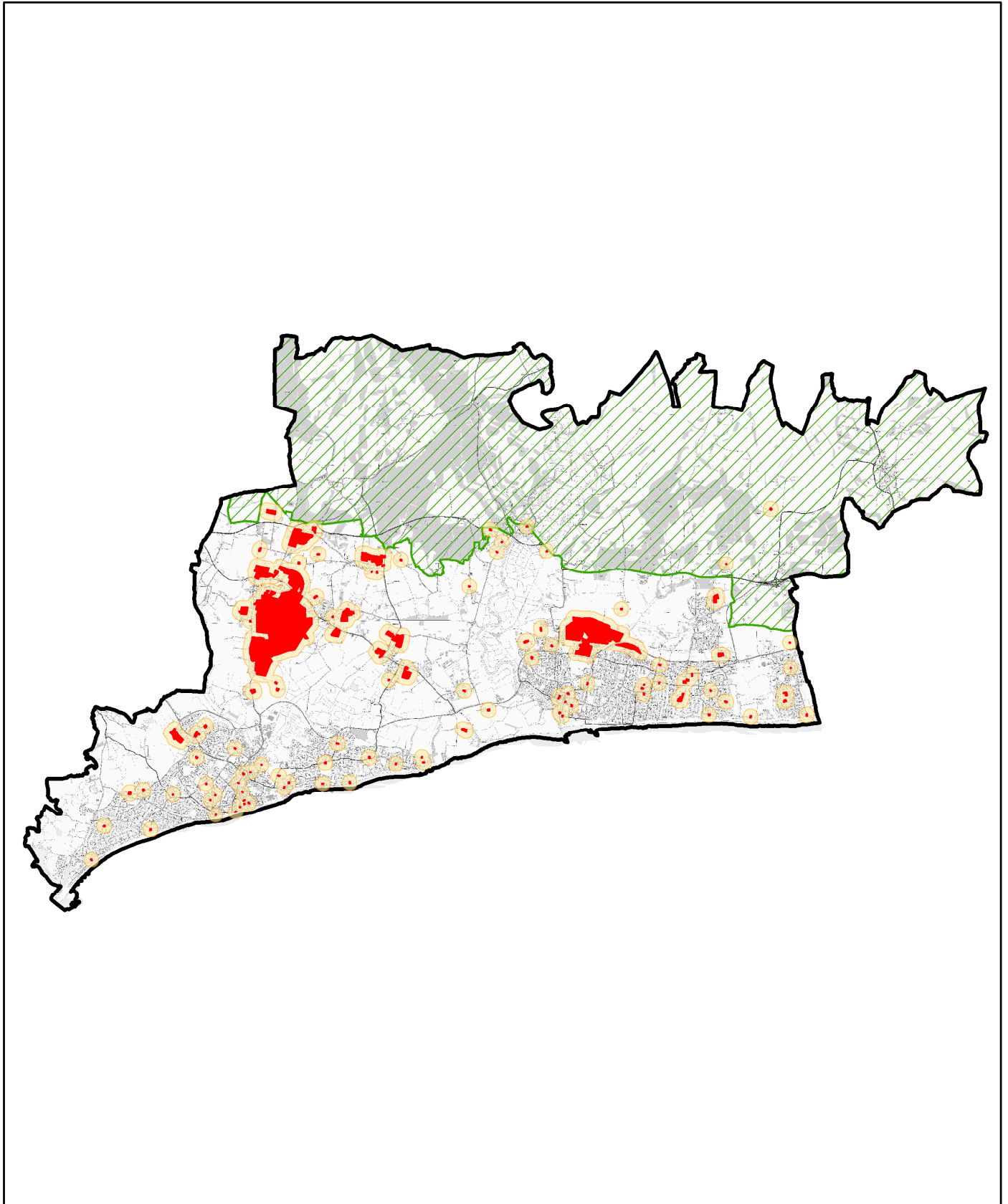
(Applications which abut a designation/reserve/habitat appear in this table with area shown as 0.00)

<b>Designation / Reserve / Habitat</b>	<b>Area (Ha)</b>	<b>Planning Application Number</b>
National Park	0.01	A/142/16/OUT
National Park	0.12	SDNP/17/01215/FUL
Coastal & floodplain grazing marsh	25.48	LU/121/17/RES
Coastal & floodplain grazing marsh	0.90	WA/22/15/OUT
Deciduous woodland	0.01	A/142/16/OUT
Deciduous woodland	0.00	CM/28/17/PL
Deciduous woodland	0.00	LU/121/17/RES
Deciduous woodland	0.00	M/94/17/PL
Deciduous woodland	1.18	WA/22/15/OUT
Deciduous woodland	0.00	WA/34/17/PL
Traditional orchard	9.43	WA/22/15/OUT
Wood-pasture & parkland	0.01	WA/38/17/PL





# Arun District

Approved Planning Applications  
1st April 2017 to 31st March 2018

Prepared on 31/10/2018



### Key to Map:

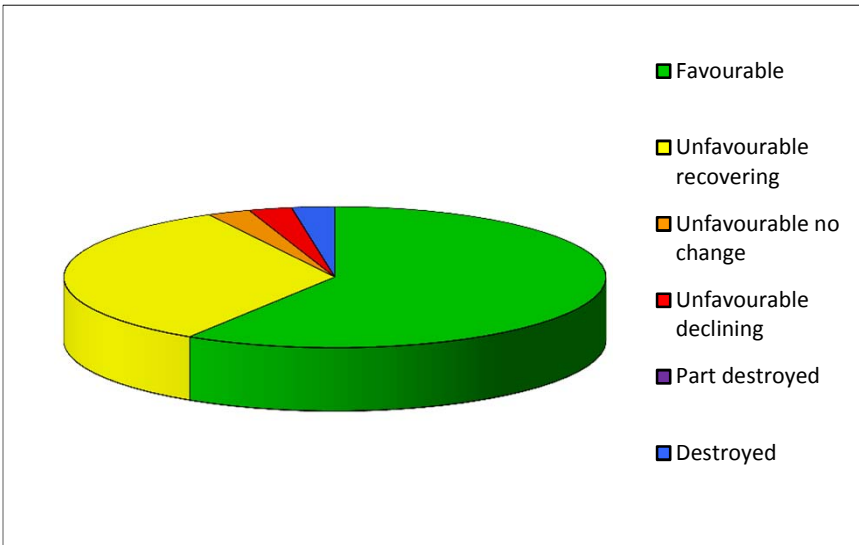
-  Approved planning application
-  200m buffer zone
-  Arun District
-  South Downs National Park

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## SSSI Unit Condition

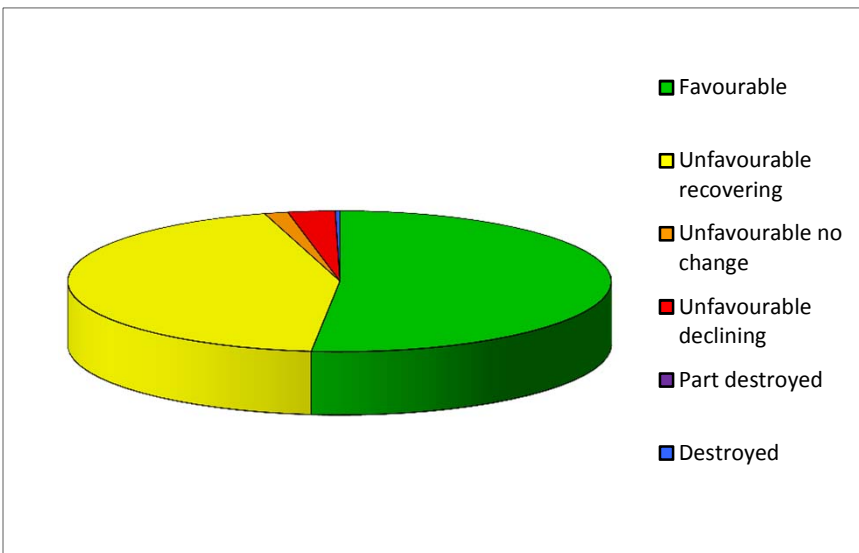
Based on information derived from Natural England  
Prepared on 01/11/2018

### SSSI Units in Arun District



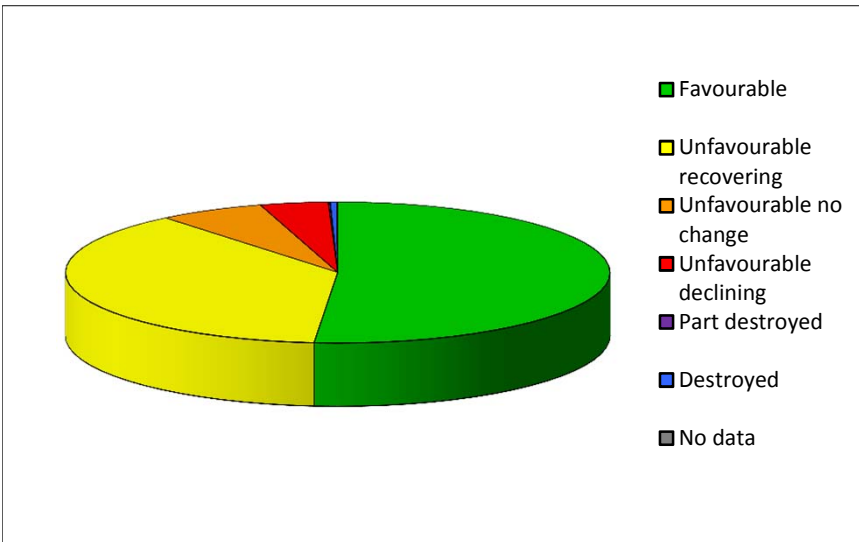
Condition	No. of Units	% of Units
Favourable	23	59.0
Unfavourable recovering	13	33.3
Unfavourable no change	1	2.6
Unfavourable declining	1	2.6
Part destroyed	0	0.0
Destroyed	1	2.6
<b>Total no. of units</b>	<b>39</b>	

### SSSI Units in West Sussex



Condition	No. of Units	% of Units
Favourable	185	51.7
Unfavourable recovering	157	43.9
Unfavourable no change	5	1.4
Unfavourable declining	10	2.8
Part destroyed	0	0.0
Destroyed	1	0.3
<b>Total no. of units</b>	<b>358</b>	

### SSSI Units in South East Region



Condition	No. of Units	% of Units
Favourable	2426	51.4
Unfavourable recovering	1780	37.7
Unfavourable no change	298	6.3
Unfavourable declining	191	4.0
Part destroyed	5	0.1
Destroyed	18	0.4
No data	3	0.1
<b>Total no. of units</b>	<b>4721</b>	

## Sussex Notable Bird List

The Sussex Notable Bird List consists of species that are particularly scarce or vulnerable to development. It includes species which are either on the Birds of Conservation Concern Red and Amber lists or Schedule 1 species known to have bred in Sussex, or have been recorded in summer and may breed in the future. These species have been decided on by the Sussex Ornithological Society (SOS).

These records are not available to the general public due to the sensitivity of the data. The SOS has kindly shared these records with us, with the view that better planning decisions can be made with their availability.

Below is the list of species and the date ranges/criteria for their inclusion:

Species	Record type treated as notable in Sussex
Mute Swan	Confirmed or probable breeding or late May - early July records
Common Shelduck	Confirmed or probable breeding or late May - early July records
Eurasian Wigeon	Confirmed or probable breeding or late May - early July records
Gadwall	Confirmed or probable breeding or late May - early July records
Eurasian Teal	Confirmed or probable breeding or late May - early July records
Mallard	Confirmed or probable breeding or late May - early July records
Pintail	Confirmed or probable breeding or late May - early July records
Garganey	Confirmed or probable breeding or late May - early July records
Shoveler	Confirmed or probable breeding or late May - early July records
Common Pochard	Confirmed or probable breeding or late May - early July records
Tufted Duck	Confirmed or probable breeding or late May - early July records
Quail	Confirmed or probable breeding or March - August records
Grey Partridge	Confirmed or probable breeding or March - August records
Fulmar	Confirmed or probable breeding records
Eurasian Bittern	All records
Little Egret	Confirmed or probable breeding records + roost
Little Grebe	Confirmed or probable breeding or late May - early August records
Honey-buzzard	Information provided in summary only
Red Kite	Confirmed or probable breeding or March - August records + roost
Marsh Harrier	Information provided in summary only
Hen Harrier	Roost
Montagu's Harrier	Information provided in summary only
Goshawk	Information provided in summary only
Osprey	Mid-May to July records
Spotted Crake	Information provided in summary only
Stone-curlew	Information provided in summary only
Black-winged Stilt	April to August records
Avocet	Confirmed or probable breeding or March - July records
Oystercatcher	Confirmed or probable breeding or late May - early July records
Ringed Plover	Confirmed or probable breeding or late May - early July records
Little Ringed Plover	Confirmed or probable breeding or April - July records
Lapwing	Confirmed or probable breeding or April - June records
Curlew	Confirmed or probable breeding or April - July records
Common Sandpiper	Confirmed or probable breeding or late May - early July records
Common Redshank	Confirmed or probable breeding or April - July records
Woodcock	Confirmed or probable breeding or March - August records
Common Snipe	Confirmed or probable breeding or April - July records
Little Tern	Confirmed or probable breeding records
Sandwich Tern	Confirmed or probable breeding records

Common Tern	Confirmed or probable breeding records
Kittiwake	Confirmed or probable breeding records
Black-headed Gull	Confirmed or probable breeding records
Mediterranean Gull	Confirmed or probable breeding records
Common Gull	Confirmed or probable breeding records
Lesser Black-backed Gull	Confirmed or probable breeding records
Herring Gull	Confirmed or probable breeding records
Yellow-legged Gull	Confirmed or probable breeding or April - June records
Great Black-backed Gull	Confirmed or probable breeding records
Stock Dove	Confirmed or probable breeding or May - July records
Turtle Dove	Confirmed or probable breeding or May - July records
Common Cuckoo	Confirmed or probable breeding or May - July records
Barn Owl	All records
Tawny Owl	Confirmed or probable breeding or May - July records
Long-eared Owl	Confirmed or probable breeding or March - July records + roost
Short-eared Owl	Confirmed or probable breeding or May - July records
Nightjar	Confirmed or probable breeding or May - July records
Common Swift	Confirmed or probable breeding records
Hoopoe	Confirmed or probable breeding or May - July records
Bee-eater	Confirmed or probable breeding or May - July records
Kingfisher	Confirmed or probable breeding or March - August records
Wryneck	Confirmed or probable breeding or May - July records
Green Woodpecker	Confirmed or probable breeding records
Lesser Spotted Woodpecker	All records
Kestrel	Confirmed or probable breeding or May - July records
Hobby	Confirmed or probable breeding or April - August records
Peregrine	Information provided in summary only
Red-backed Shrike	Information provided in summary only
Firecrest	Confirmed or probable breeding or May - August records
Willow Tit	All records
Marsh Tit	Confirmed or probable breeding or April - July records
Bearded Tit	Confirmed or probable breeding or March - August records
Woodlark	Confirmed or probable breeding or February - August records
Skylark	Confirmed or probable breeding or April - July records
Sand Martin	Confirmed or probable breeding records
Barn Swallow	Confirmed or probable breeding records
House Martin	Confirmed or probable breeding records
Cetti's Warbler	Confirmed or probable breeding or March - August records
Wood Warbler	Confirmed or probable breeding or April - August records
Willow Warbler	Confirmed or probable breeding records
Common Whitethroat	Confirmed or probable breeding records
Dartford Warbler	Confirmed or probable breeding or March - August records
Grasshopper Warbler	Confirmed or probable breeding or May - July records
Savi's Warbler	Information provided in summary only
Marsh Warbler	Information provided in summary only
Common Starling	Confirmed or probable breeding records
Song Thrush	Confirmed or probable breeding records
Mistle Thrush	Confirmed or probable breeding records
Spotted Flycatcher	Confirmed or probable breeding records
Common Nightingale	Confirmed or probable breeding records
Pied Flycatcher	Confirmed or probable breeding or May - July records
Black Redstart	May - July records
Common Redstart	Confirmed or probable breeding or April - July records
Whinchat	Confirmed or probable breeding or May - July records

Northern Wheatear	Confirmed or probable breeding or May - July records
Dunnock	Confirmed or probable breeding records
House Sparrow	Confirmed or probable breeding records
Tree Sparrow	All records
Yellow Wagtail	Confirmed or probable breeding or May - June records
Blue-headed Wagtail	Confirmed or probable breeding or May - June records
Grey Wagtail	Confirmed or probable breeding or May - June records
Tree Pipit	Confirmed or probable breeding or May - July records
Meadow Pipit	Confirmed or probable breeding or May - July records
Hawfinch	All records
Bullfinch	Confirmed or probable breeding records
Linnet	Confirmed or probable breeding records
Lesser Redpoll	Confirmed or probable breeding or May - July records
Common Crossbill	Confirmed or probable breeding or February - June records
Serín	All records
Corn Bunting	All records
Cirl Bunting	All records
Yellowhammer	Confirmed or probable breeding records
Reed Bunting	Confirmed or probable breeding records

## Sussex Invasive Non-Native Species (INNS)

An invasive non-native species (INNS) is defined as a species whose introduction and/or spread threatens biological diversity. The INNS table includes records of non-native species listed in Schedule 9 of the Wildlife & Countryside Act 1981 (WCA) and 26 other species not in this Schedule but which pose a particular risk in Sussex. These additional species are:

Scientific name	Common name
<i>Pseudorasbora parva</i>	Topmouth Gudgeon
<i>Leucaspis delineates</i>	Sunbleak
<i>Amsinckia micrantha</i>	Common Fiddleneck
<i>Centranthus ruber</i>	Red Valerian
<i>Gaultheria shallon</i>	Shallon
<i>Hyacinthoides hispanica</i>	Spanish Bluebell
<i>Nymphoides peltata</i>	Fringed Water-lily
<i>Petasites fragrans</i>	Winter Heliotrope
<i>Prunus laurocerasus</i>	Cherry Laurel
<i>Hyacinthoides non-scripta x hispanica = H. x massartiana</i>	Hybrid Bluebell
<i>Lemna minuta</i>	Least Duckweed
<i>Acaena novae-zelandiae</i>	Pirri-pirri-bur
<i>Lysichiton americanus</i>	American Skunk Cabbage
<i>Cortaderia selloana</i>	Pampas Grass
<i>Quercus ilex</i>	Evergreen Oak
<i>Harmonia axyridis</i>	Harlequin Ladybird
<i>Lilioceris lili</i>	Lily Beetle
<i>Cameraria ohridella</i>	Horse-Chestnut Leaf-miner
<i>Campylopus introflexus</i>	Heath Star Moss
<i>Trachemys scripta</i>	Red-eared Terrapin
<i>Lithobates catesbeianus</i>	American Bullfrog
<i>Styela clava</i>	Leathery Sea Squirt
<i>Dreissena polymorpha</i>	Zebra Mussel
<i>Dreissena rostriformis bugensis</i>	Quagga Mussel
<i>Lymantria dispar</i>	Gypsy Moth
<i>Thaumetopoea processionea</i>	Oak Processionary Moth



## ARUN DISTRICT COUNCIL

### REPORT TO AND DECISION OF PLANNING POLICY SUB-COMMITTEE ON 18 JUNE 2019

#### PART A : REPORT

**SUBJECT: DRAFT ARUN PARKING STANDARDS SUPPLEMENTARY PLANNING DOCUMENT**

**REPORT AUTHOR:** Neil Crowther, Group Head of Planning

**DATE:** 31 May 2019

**EXTN:** x 37839

**PORTFOLIO AREA:** Planning

#### EXECUTIVE SUMMARY:

This report provides members with the proposed policy approach to Parking Standards based on technical evidence provided by West Sussex County Council adapted for Arun's circumstances and to be subject to public consultation and adoption as Council Policy.

#### RECOMMENDATIONS:

That Planning Policy Sub-Committee:-

1. Agrees the proposed timetable and consultation for the preparation of an Arun District Parking Standards Supplementary Planning Document; and
2. That subject to any further minor changes (including those signalled in this report) in consultation with the Chairman, Portfolio holder for Planning and Group Head of Planning, the draft Arun District Parking Standards be published for 4 weeks public consultation in the Summer 2019.

#### 1. BACKGROUND:

- 1 The West Sussex County Council (WSCC) Draft Guidance on Parking at New Developments was sent to District and Borough Council's for comment on 1<sup>st</sup> November 2018. Development Control Committee agreed some comments in response at its meeting on 14 November 2018. These were mainly around the usability of the document as well as incorporating electric vehicle charging points in line with Arun's previous approach.
- 2 In discussions with the Director of Place and the Portfolio Holder at that time, it was decided that Arun District Council use the evidence gathered by WSCC to produce a stand-alone Arun Parking Standards Supplementary Planning Document (SPD) so that it would have greater weight in the determination of planning applications.

3 The attached document is the proposed draft Arun Parking Standards SPD that is proposed to be consulted upon.

**2. PROPOSAL(S):**

To consult upon the draft Arun Parking Standards SPD.

**3. OPTIONS:**

To continue to rely upon the guidance produced for the whole of the county of West Sussex. Following the draft sent to Districts & Borough's in November 2018, it is not known what the timescales are to progress this document towards formal guidance. There is no intention for WSCC to adopt it as a Supplementary Planning Document.

**4. CONSULTATION:**

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

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

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

**6. IMPLICATIONS:**

Once adopted, the SPD will be applied to planning applications under Policy TSP1 criteria 'd' of the Adopted Arun Local Plan 2011-2031.

The proposed Parking Standards include requirements for parking for people with disabilities as well as gradually increased requirements for electric vehicle charging points. These will have a positive impact upon equalities and sustainability.

**7. REASON FOR THE DECISION:**

In order for the evidence behind the County wide 'guidance' to have greater weight in the determination of planning applications in Arun District and for Arun District Council to be able to use this evidence to create a specific SPD that is relevant to Arun District.

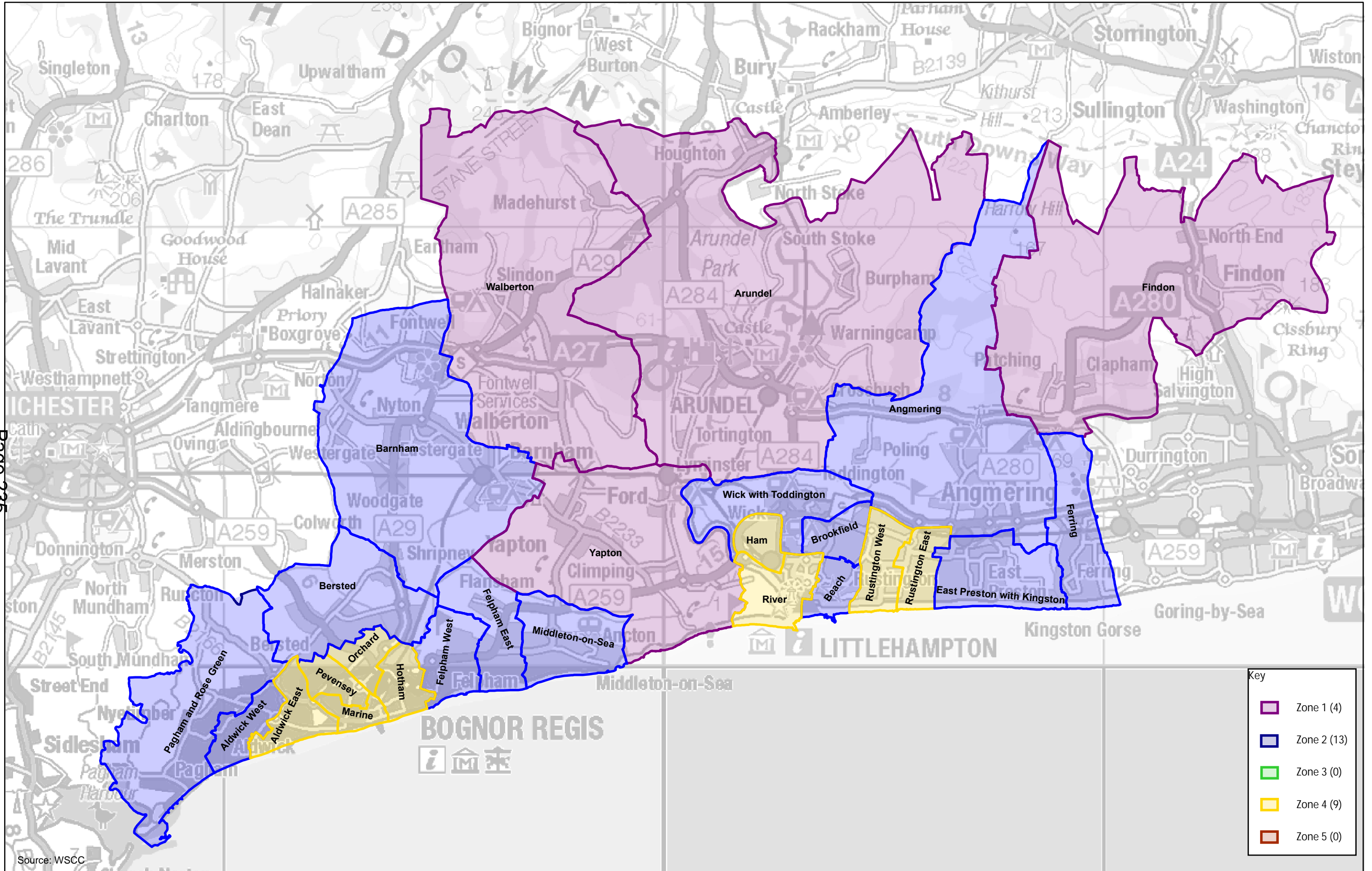
**8. BACKGROUND PAPERS:**

Background Paper 1: Development Control Committee agenda 14 November 2018

<https://democracy.arun.gov.uk/ieListMeetings.aspx?Committeeld=137>

Background Paper 2: Arun District Parking Standards Supplementary Planning Document  
June 2019

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Source: WSCC

Key	
	Zone 1 (4)
	Zone 2 (13)
	Zone 3 (0)
	Zone 4 (9)
	Zone 5 (0)

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Regional Parking Zone Allocation. Arun District. Appendix C-2

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**Arun District Council**

**Draft Parking Standards Supplementary  
Planning Document**

**June 2019**





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## 1. Introduction

- 1.1 In October 2018, West Sussex County Council consulted upon draft updated guidance on parking for new developments. The purpose of this document was to provide guidance across the County on parking standards and to update the standards that were adopted in 2010.
- 1.2 Arun District Council is using this document and the data behind it to progress a draft Supplementary Planning Document (SPD) for Arun District which will be used in the determination of planning applications.
- 1.3 The National Planning Policy Framework 2018 (NPPF) highlights the need to consider transport in plan making and in the determination of planning applications.
- 1.4 Further, the Arun Local Plan has policies on parking provision. Policy T SP1 requires appropriate levels of car parking and this draft SPD seeks to define and formalise these standards in order to give them greater weight when considering planning applications. A forthcoming Arun Design Guide will provide guidance on the design of parking within schemes.
- 1.5 The County Council, in its role as the local highway authority, is a statutory consultee on planning applications that affect the highway and provides advice to local planning authorities on the transport implications of developments to inform planning decisions.
- 1.6 This SPD is intended to outline Arun District Council's approach to parking at new developments (residential/commercial). It should be used to help determine the level of parking at new developments and provide the basis for the County Council's advice to local planning authorities on planning applications.
- 1.7 In preparing their draft guidance, the County Council has taken a strongly evidence-led approach to parking in new developments, to ensure that the number of parking spaces provided is appropriate to the location and the characteristics of the development. The evidence base includes a range of primary and secondary data sources that are intended to provide a robust and credible evidence base. The following data sources have been reviewed and used to support the development of new guidance, including:
  - Census Data;
  - The National Highways and Transport Network Public Satisfaction Survey 2017;
  - TRICS Database (where surveys exist within West Sussex or relates to the region);
  - National research and studies on demand for commercial parking; and
  - Parking based surveys at a sample of recent developments undertaken in 2018.
  - WSCC Parking Standards Review, May 2018

## **2. Guiding Principles of the Approach**

2.1 Paragraph 105 of the National Planning Policy Guidance identifies that parking standards should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

2.2 The NPPF (2019) includes a new paragraph (106) which limits the use of maximum parking standards. It states that they should “*only be set where there is a clear and compelling justification that they are necessary for managing the local road network or for optimizing the density of development in city and town centres*”. This SPD has been prepared to formalise the evidence base used to support the creation of WSCC parking standards. The evidence shows that there is a requirement to set parking standards across West Sussex.

Where reduced parking provision is being proposed to optimise the density of development within Arun’s town centres, robust evidence must be provided to show that the proposed development would comply with the Guiding Principles for Development set out below.

### **Electric Vehicle Charging**

2.3 Arun District Council’s Electric Vehicle Infrastructure Study which was agreed at Full Council on 10<sup>th</sup> January 2018. Policy QE DM3 of the Arun Local Plan seeks to encourage the use of electric vehicle charging points. For completeness, Section 4 of the ADC Vehicle Infrastructure Study is included below.

Provision of Parking Bays & Charging Points for Ultra-low emission vehicles (ULEV) in New Development (including Conversions)	
Houses <sup>[1]</sup>	One charging point per house with garage or driveway
Flats (<50 units) <sup>[2]</sup>	One parking bay marked out for use by electric vehicles only, together with charging infrastructure and cabling.
Flats (>50 units) <sup>2</sup>	Further dedicated charging bays totaling 2% of the total provision.
Other Development (<50 Bays)	One parking bay marked out for use by electric vehicles only, together with charging infrastructure and cabling.
Other Development (>50 Bays)	Further dedicated charging bays totaling 2% of the total provision.
Phasing	Standard provision (as set out above) could be supplemented by the installation of groundwork / passive wiring at the commencement of development in order to enable further installation to match demand.

1 Recommended installation of 16A or higher Type 2 charger (minimum requirement standard 3 pin 13A charger)

2 Dedicated free standing weatherproof chargers

Where a development includes the delivery of parking spaces which are on-street (eg. estate renewal schemes), Electric Vehicle charge points should be delivered to the same standard as those set out.

It is proposed to update the standards within the table above.

- 2.4 The increasing popularity of electric vehicle types has seen the Department for Transport forecast that plug in vehicles will make up between 3% and 7% of all new car sales in 2020. As a result of evidence gathered by WSCC through their review of their draft Parking Standards, it is proposed to adopt the following minimum standards in this SPD.

**Table 1 – Electric Vehicle Charging Points Requirements**

Year	% Number of EV Spaces
2018	20
2023	30
2028	50
2033	100

## Guiding Principles for Developments

2.5 The following principles set out the District Council's approach to parking in new residential developments and Commercial developments and should be used as a starting point in the design of new developments.

2.6 In the preparation of the County Council guidance, an iterative review of mapped census statistics across the whole of West Sussex was undertaken using iGIS (WSP Geographical Information System interface). The county wide review identified 9 key statistical interest values that informed the identification of Parking Behaviour Zones. For Arun only three zones are identified (these zones are shown on the Draft Regional Parking Zone Allocation. Arun District Map which is found in Appendix 1 to this document<sup>1</sup>:

**Zone 1** - Rural (village locations, e.g. Walberton);

**Zone 2** - Peri-rural (large villages or small settlements close to towns e.g. Angmering, Barnham);

**Zone 4** - Urban (within towns but not in a central location); and

### Principle 1

2.7 Parking provision should be sufficient to accommodate demand whilst exploiting the potential for sustainable travel, minimising adverse effects on road safety and avoiding increased on-street parking demand.

2.8 If parking could reasonably be expected to take place in existing streets, then it will be necessary to demonstrate through a parking capacity survey that there is sufficient capacity to accommodate the expected parking demand.

### Principle 2

2.9 Expected levels of vehicle ownership should be determined taking account of dwelling size (rooms); unit type (houses or flats); unit tenure (private/affordable), parking provision (allocated or unallocated), control/enforcement (charges etc.).

2.10 Calculation of expected levels of vehicle ownership should normally be based on local or comparable data taking account of forecast changes in demand for the Local Plan period. Where electric vehicle charging points are provided, these will be included in the "total demand" as a percentage of the allocated spaces.

### Principle 3

2.11 'Active' charging points for electric vehicles shall be provided at 20% (at 2019 levels of provision) of all parking spaces with ducting provided at all remaining

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<sup>1</sup>. It should be noted that this zone map is from the *West Sussex County Council Parking Standards Review* (WSP, 2018) which is currently in draft format subject to approval by West Sussex County Council. The final map will be added to this document once approved.

spaces where appropriate to provide 'passive' provision for these spaces to be upgraded in future. This applies to residential, retail (supermarkets), Office/industrial, and other Commercial land uses. Passive provision involves the inclusions of the necessary infrastructure underground in order to enable connection to a charging point at a later date.

#### Principle 4

2.12 In some locations, limiting parking provision will form part of a strategy to exploit the potential for sustainable transport. In order to realistically promote lower levels of car ownership and use whilst avoiding unacceptable consequences, all of the following must be available or provided:

- Travel plan measures, targeted at reducing car use and thereby reduce ownership levels;
- High levels of accessibility to non-car modes of travel and to local amenities and facilities; and
- Comprehensive parking controls; i.e. Controlled Parking Zone.

#### Principle 5

2.13 In some circumstances it may be necessary to regulate on-street parking to manage or mitigate the impact of development. If Traffic Regulation Orders (TRO) are required then developers will be expected to fund administration and works costs. However, the starting point is that each development site provides sufficient parking to meet its own demands within the application site.

#### Principle 6

2.14 To ensure that developments function efficiently and as intended, detailed consideration needs to be given to the following:

- a) Providing garages of sufficient size - If garages are provided they must be at least 6m x 3m internally. If garages meet this requirement, they will be regarded as an allocated parking space of 1 and calculations of parking demand will take account of this. Where garages do not meet this minimum size, they will not be counted towards parking demand.
- b) Providing adequate visitor parking - Adequate visitor parking is required and this will be influenced by the level of unallocated parking.
- c) Likely cycle ownership and storage - Good cycle storage facilities are important, but requirements should take account of dwelling size and type. The minimum standard of cycle provision is set out in Table 2.
- d) Where accessible or wheelchair friendly accommodation is proposed or required, parking spacing and garaging should be provided in

accordance with the requirements for increased parking space proportions.

**Table 2: Recommended levels of cycle provision.**

Type	Dwelling Size	Cycle Provision (per unit)
Houses	Up to 4 rooms (1 & 2 bed)	1 space
Houses	5+ rooms (3+ bed)	2 spaces
Flats	Up to 3 rooms (1 & 2 bed)	1 space (if communal storage otherwise same as 1 & 2 bed house)
Flats	4+ rooms (3+ bed)	1 space

- d) Impact on “total demand” where electric vehicle charging points are provided.
- e) Spaces for disabled people – Provision should be consistent with guidance in “Manual for Streets”.
- f) Motorcycle parking - Provision should be consistent with guidance in “Manual for Streets”.
- g) Space for storage bins – Part H of the Building Regulations suggests storage areas dimensions which are suitable for refuse and recycling bin storage. Development may be required to demonstrate suitable storage to ensure parking provision is available at all times.

Principle 7

2.15 The varying characteristics across the District means that the amount of commercial vehicle parking will vary greatly between one site and another. The amount of car parking should be based on:

- a) The developments land-use,
- b) Trip rate associated with the development (including base and forecast mode share), and
- c) The user group of staff/visitors of the site (including shift patterns).

### 3. Residential Parking Guidance

- 3.1 The values of parking demand presented in Table 3 will be used as expected levels of demand for the design and master planning of new residential developments. These include provision of EV spaces as set out in Principle 3. As part of the Design & Access Statement applicants will be expected to schedule the parking provision, detailing the number of allocated and unallocated spaces including garages and electric vehicle charging spaces (active and passive). The Design & Access Statement should explain how the provision of parking will meet the needs of the development including how these needs are expected to change in the future.
- 3.2 To satisfy the promotion of sustainable travel modes and choices it is considered that a 10% variation below the target parking demand value be allowed where appropriate travel option provision is provided including travel plans, public transport contributions and other sustainable travel initiatives. This is also as a result of increasing affordability issues resulting in young people staying with parents for longer.

**Table 3 – Expected level of provision for new residential developments**

Number of bedrooms	Number of habitable rooms	Parking Behaviour Zone				
		1	2	3	4	5
1	1 to 3	2	2	4	1	<del>0.6</del>
2	4	2	2	4	1	<del>1.1</del>
3	5 to 6	2	2	2	2	<del>1.6</del>
4+	7 or more	3	3	3	2	<del>2.2</del>

- 3.3 In addition to the above, visitor parking will be required to be provided at a ratio of 20% of the total number of residential units. For example, if there were 100 dwellings proposed, in addition to the allocated residents parking, 20 visitor spaces should be provided. A more flexible approach will be taken with schemes that incorporate flats and on sites close to urban centres.

### 4. Non-residential Parking Guidance

- 4.1 Parking for non-residential uses needs to consider the accessibility of the site, the likely demand for parking and the viability of the site. In determining the amount of parking that should be provided at non-residential developments, developers should seek to balance operational needs, space requirements,

efficient use of land and cost attributed to providing parking and where relevant, attracting / retaining staff.

- 4.2 Businesses are obliged to minimise their effect on the environment. In support of this obligation and in line with the West Sussex Transport Plan, businesses should promote sustainable travel behaviour by encouraging employees to travel by non-car modes and reducing the number of single occupancy car journeys. To support sustainable travel measures the availability of car parking or cost of use should be carefully controlled.
- 4.3 Since the publication of the previous West Sussex Parking Standards for Commercial Vehicle noted in the SPD of November 2003, there has been a shift in government policy as more flexible working practices have been established. The move to a new planning system during 2006 further shifted the responsibility for determining parking standards to individual local planning authorities and indicates that local circumstances should be taken into account when setting such standards.
- 4.4 The 2003 Standards are based on the maximum parking standards provision, which were removed by Central Government in 2011.
- 4.5 The amount of parking in commercial developments should be based on:
- the developments land-use,
  - trip rate associated with the development (including base and forecast mode share) and
  - the user group of staff/visitors of the site (including shift patterns).
- 4.6 It is the responsibility of the developer to provide evidence that adequate facilities are provided on site for the proposed use, including cycle parking, changing and storage facilities. Due regard should be paid to unique characteristics of each land use. This may include providing details of the proposed operation of the site once in use such as whether the site will need to store vehicles not in use or on layover periods, the frequency of vehicles visiting the site for deliveries or the type and size of vehicles using the site.
- 4.7 In addition the following should be taken into account:
- The volume of staff/visitor parking should be demonstrated through survey or business data to ascertain the peak parking periods and demand;
  - The geographically location of the site along with the levels of accessibility for non-car mode users; and
  - Local mode share data, baseline or forecast mode shares detailed in supporting travel plans.
- 4.8 Table 4 sets out the overall vehicular and cycle parking standards by land use. Whilst the requirements were based on maximum standards for car parking and minimum cycle parking standards in 2003, they should now be



used as a guide for developers and justified on the above criteria through a site-specific assessment.

**Table 4 - Vehicular and Cycle Parking Provision in Non-Residential Developments**

<b>Use Class</b>	<b>Vehicular</b>	<b>Cycle</b>
A1 Shops	1 space per 14sqm	1 space per 100sqm for staff and 1 space per 100sqm for customers
A2 Financial and Professional Services	1 space per 30sqm	space per 100sqm for staff and 1 space per 200sqm for customers
A3 Restaurant and Café	1 space per 5sqm of public area and 2 spaces per bar (or 5m length of bar for large bars) for staff parking to be clearly designated	1 space per 4 staff and 1 space per 25sqm for customers
A4 Drinking Establishments	As A3 although not defined in 2003 Standards	As A3
A5 Hot Food Takeaways	As A3 although not defined in 2003 Standards	As A3
B1 Business	1 space per 30sqm 500sqm in less accessible areas	1 space per 150sqm for staff and 1 space per 500sqm for visitors
B2 General Industrial	1 space per 40sqm	1 space per 200sqm for staff and 1 space per 500sqm for visitors
B8 Storage	1 space per 100sqm	1 space per 500sqm for staff and 1 space per 1000sqm for visitors
D1 Non-Residential Institutions	Site specific assessment based on travel plan and needs	Site specific assessment based on travel plan and needs

D2 Assembly & Leisure	As these are D2 uses, those standards should be applied (Part A)  1 space per 22sqm for large scale places of assembly serving more than a local catchment 1 space per 15sqm.	1 space per 4 staff plus visitor / customer cycle parking
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Appendix 1 - Draft Regional Parking Zone Allocation - Arun District (Draft *West Sussex County Council Parking Standards Review* (WSP, 2018))

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