

Arun District Council

Authority Monitoring report 1st April 2017 – 31st March 2018



June 2019

Contents

Introduction	3
Authorities Monitoring Report (AMR)	3
Chapter 1: Background, Local Plan, Gypsy and Traveller Site Allocation DPD, Non-Strategic Site Allocations DPD & CIL Charging Schedule.....	4
1. The Local Plan	4
2. Gypsy & Traveller Site Allocations Development Plan Document (DPD)	5
3. Non-Strategic Site Allocations Development Plan Document (NSSADPD)	6
4. Community Infrastructure Levy (CIL) Charging Schedule	6
Chapter 2: Neighbourhood Planning	7
1. Introduction.....	7
2. NDP Update and Progress	7
3. Government Update	9
4. Conclusion.....	9
Chapter 3: Duty to Cooperate	11
Chapter 4: Housing Land Supply	13
Appendix 1 – Historic and latest dwelling completions.....	23
Appendix 2 – Large site dwelling permissions from Residential Land Availability Survey included in the 5 year supply/Local Plan Trajectory	24
Appendix 3 – Strategic Allocation sites (without planning permission) from the HELAA included in the 5 year supply/Trajectory	25
Appendix 4 – Deliverable HELAA sites included in the 5 year Supply/Local Plan Trajectory	26
Appendix 5 - Neighbourhood Plan Sites included in 5 year HLS/Trajectory	27
Appendix 6 – Small site permissions and windfall calculation.....	28
Appendix 7 – Local Plan Trajectory	29
Chapter 5: Housing Delivery Tables.....	30
Chapter 6: Commercial Land Delivery.....	31
Chapter 7: Gypsy and Traveller Sites Provision.....	32
Chapter 8: Sussex Bio Diversity Report (Appendix 8)	34

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 9th March 2017. A more recent LDS 2018-2021 was approved by Full Council on 18th 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 30th October 2014 and 12th 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 30th 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 28th 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 14th 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 10th April to 30th May 2017, further examination hearings were held between 19th and 28th 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 12th January to 23rd 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 4th July 2018, and the Arun Local Plan was adopted by resolution of the Full Council on 18th 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 th 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 8th November 2018 and to be ‘made’ at Full Council on 9th 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 (1st April 2017 – 31st 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 4th 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 31st 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 31st 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 31st 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 31st 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 31st March**

10.1 Sites allocated in Neighbourhood Plans that have either been made or that have passed examination (as at 31st 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 31st 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 31st 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	0	0	19	60	74	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 31st 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 st March 2018 from WSCC RLA data – Appendix 2)	2780
Small Site Commitments (as at 31 st March 2018 from WSCC RLA data – Appendix 6)	271
Windfall allowance (as at 31 st March from WSCC RLA data – Appendix 6)	153
Made Neighbourhood Plan Allocations without planning permission as at 31 st March 2018 from HELAA – Appendix 5)	352
Deliverable HELAA Sites within built up area (if a HELAA site gained Planning permission after 31 st March 2018 it will still show in this category up until 31 st March 2019 when it will then move to the large commitments category – Appendix 4)	348
Strategic Site Allocations (without PP as at 31 st March 2018 – Appendix 3)	2007
Total Supply	5911
Supply in years	4.7

**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 = $4373 = 537$*

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

Years	Total Actual Completions
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
Total	5856
Average	586

Table 2 Net Completions - WSCC RLA data Excluding SDNPA

Data last 5 years

Years	Total Actual Completions
2013/14	359
2014/15	601
2015/16	890
2016/17	622
2017/18	704
Total	3176
Average	635

Appendix 2 – Large site dwelling permissions from Residential Land Availability Survey included in the 5 year supply/Local Plan Trajectory

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									
										3118 = 5 Year Supply - 29 Losses = 3089 less 10% = 2780								

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
										subtotal	0	10	25	100	297	320	224	300	350	334	300	250	250
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
										subtotal	0	0	0	50	100	175	150	100	100	100	0	0	0
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
										subtotal	0	53	122	200	200	200	225	225	225	225	200	200	200
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	
										subtotal	0	0	0	25	75	125	130	100	100	80	0	0	0	
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
										subtotal	0	0	50	50	50	50	75	50	50	50	50	50	50	25
										total	0	63	247	650	1047	1295	1254	1250	1275	1164	875	775	615	

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	33	0	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.
						762	0	23	101	121	142	132	105	31	28	23	14	0	33	9	0		

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.

Y15	Cinders Lane Nursery and works to the rear	Deliverable	Yapton	Residential	Greenfield	70			0	25	25	20	0	0	0	0	0	0	0	0	0	0	0	2 applications cover this site one for 51 dwellings Y/5/17/OUT (Approved 31/8/18) and one for 19 dwellings Y/32/17/OUT (Approved 26/9/18) This will be included in RLA commitments 2019 but considered deliverable in this.	
115	Electronic Sub Sation, Ford Road	Developable	Arundel	Residential	Brownfield (PDL)		37		0	0	0	0	0	0	0	0	0	0	0	0	37	0	0	0	Site promoted for development in December 2018, recent activity shows deliverability.
138	Land to the East of Collins Close,	Developable	Eastergate	Residential	Greenfield		25		0	0	0	0	0	0	0	25	0	0	0	0	0	0	0	0	This site was originally part of the wider NP Allocation of 60 dwellings, the other half of this NP site now has PP under EG/71/14/OUT. Southern half gained pp for a medical centre June 2018.
NEWFG4	Land at Ferringham Lane	Developable	Ferring	Residential	Residential		14		0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	Likely to come forward towards the end of the plan period so considered a developable site
NEWFG3	Ferring Village Hall, Ferring Street	Developable	Ferring	Residential	Brownfield (PDL)		9		0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	Issues to sort so considered developable in the later half of the plan.
NEWLU40	Former Hospital Site, Fitzalan Road/Church Street	Developable	Littlehampton	Residential	Brownfield (PDL)		19		0	0	0	0	0	0	0	19	0	0	0	0	0	0	0	0	Considered a longer term - developable site
NEWWA14	Land at the Rear of Woodacre, Arundel Road Fontwell	Developable	Walberton	Residential	Greenfield		8		0	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0	Considered a longer term - developable site
									531			0	25	25	146	195	45	14	25	19	0	0	37		
																								391 is 5 yr total less 10% = 352	

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	
TOTAL	463	114.65	94.65	61.4	18.15	2.55	291.4	62.9%
Losses (Demolitions)	46	5.77	7.28	4.6	2.68	0.38	20.7	
Net	417	109	87	57	15	2	271	
Windfall balance		0	0	19	60	74	153	

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

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 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														
TOTAL	4,373	722	475	359	601	890	622	704													
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
Sub Total	5,317								456	453	1547	886	525	328	328	226	167	143	134	82	42
10% slippage / non-implementation rate	532								46	45	155	89	53	33	33	23	17	14	13	8	4
Sub Total	4,785								410	408	1392	797	473	295	295	203	150	129	121	74	38
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
TOTAL	5,841								519	495	1468	873	549	371	371	279	226	205	197	150	114
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
TOTAL	10,510								0	63	247	650	1047	1295	1254	1250	1275	1164	875	775	615
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
TOTAL SUPPLY	21,974	722	475	359	601	890	622	704	519	558	1,715	1,523	1,596	1,766	1,725	1,629	1,651	1,569	1,272	1,125	929

Chapter 5 - Housing Delivery

The table below shows the planned housing targets to 2031

H1 Plan period and Housing Targets	
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

H2(a),H2(b) and H3 Indicators		H2 (a&b)	H3
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%)
Total	4,575	4,367	1916

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
Grand Total	104	104

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
Grand Total	728	704

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
31st March 2018	118,641	118,558

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
Grand Total	6035	55	5980	0.7

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
Grand Total	455	55	400	0.05

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
Grand Total	170872.5	1368.15	169504.35	260.36

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
Grand Total	0	0	0	0

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 31st October 2018.



Biodiversity Annual Monitoring Report

Arun District

1st April 2017 – 31st 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.

Table 2. Habitats *	Area of habitat in West Sussex (ha)	% of West Sussex	Area of habitat in Arun District (ha)	% of Arun District	Area of habitat in Arun District infringed by planning applications (ha)	% of habitat in Arun District infringed by planning applications	Number of planning applications within or abutting habitat
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
Reedbed	60.11	0.03	11.45	0.05	0.00	0.00	0
Saline 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

Table 3. Species Data # (1980 onwards)	Number of records in West Sussex	Number of records in Arun District	No. of planning applications with species records within 200m buffer	% of planning applications with species records within 200m buffer
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

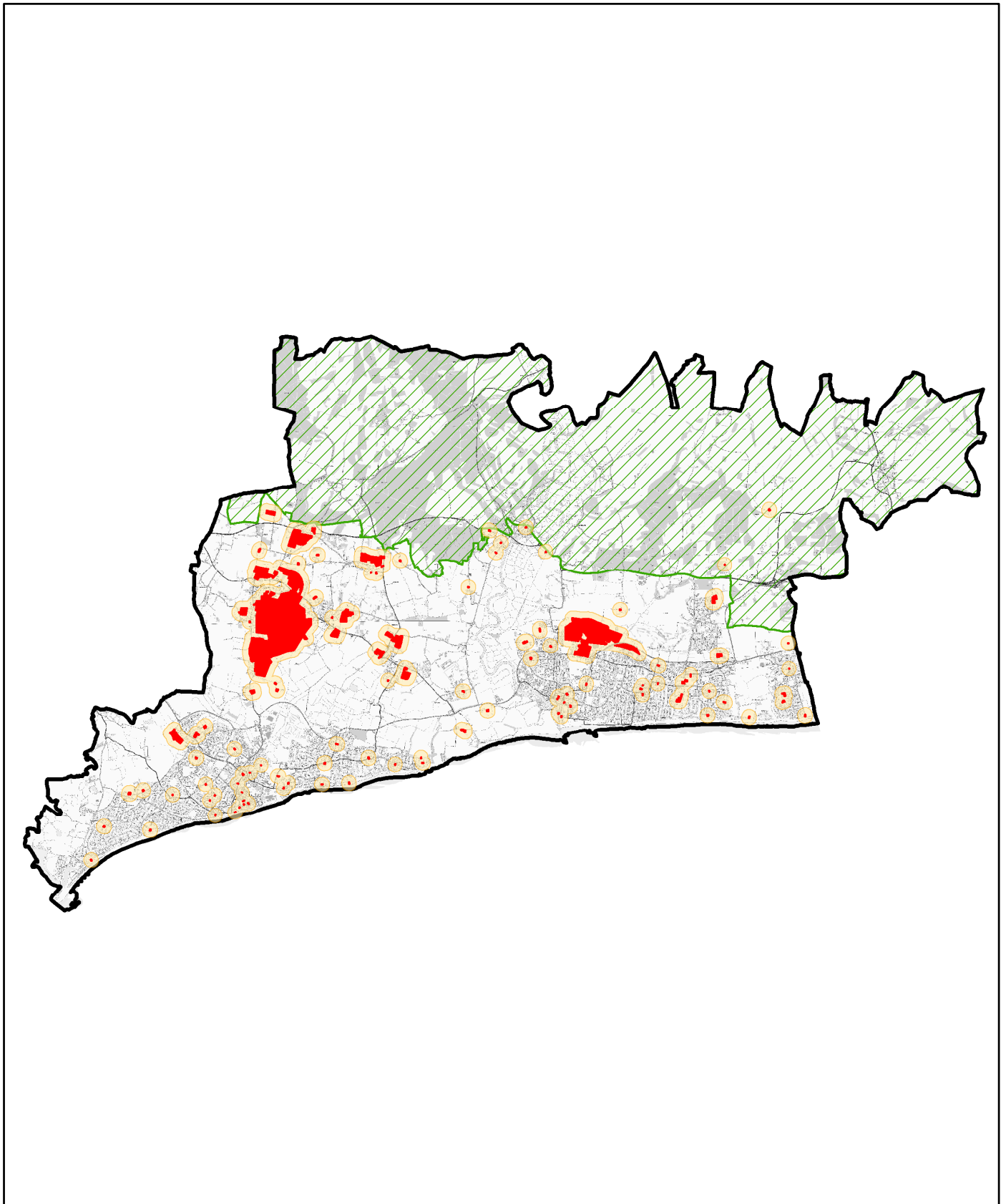
(Applications which abut a designation/reserve/habitat appear in this table with area shown as 0.00)

Designation / Reserve / Habitat	Area (Ha)	Planning Application Number
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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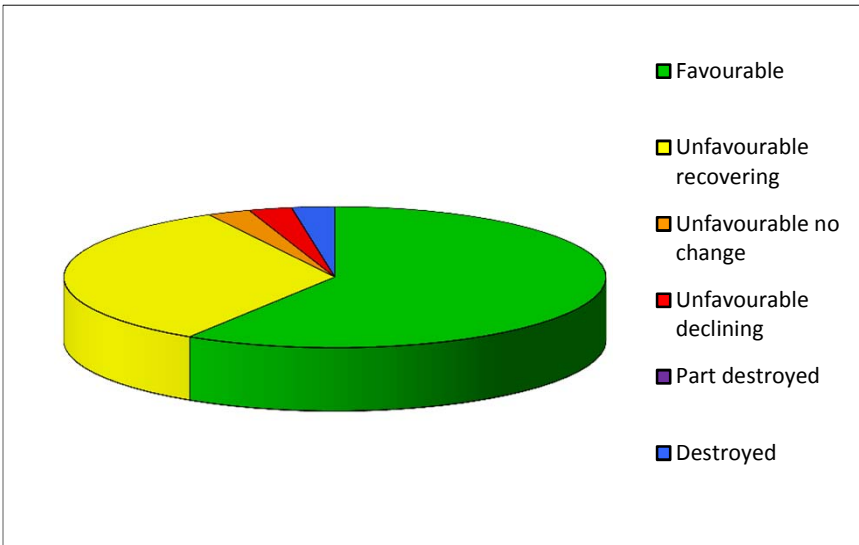


SSSI Unit Condition

Based on information derived from Natural England

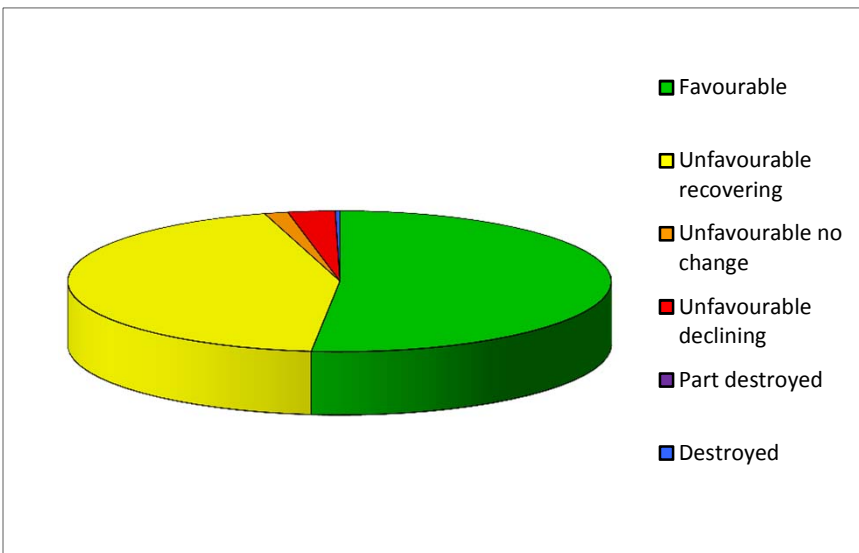
Prepared on 01/11/2018

SSSI Units in Arun District



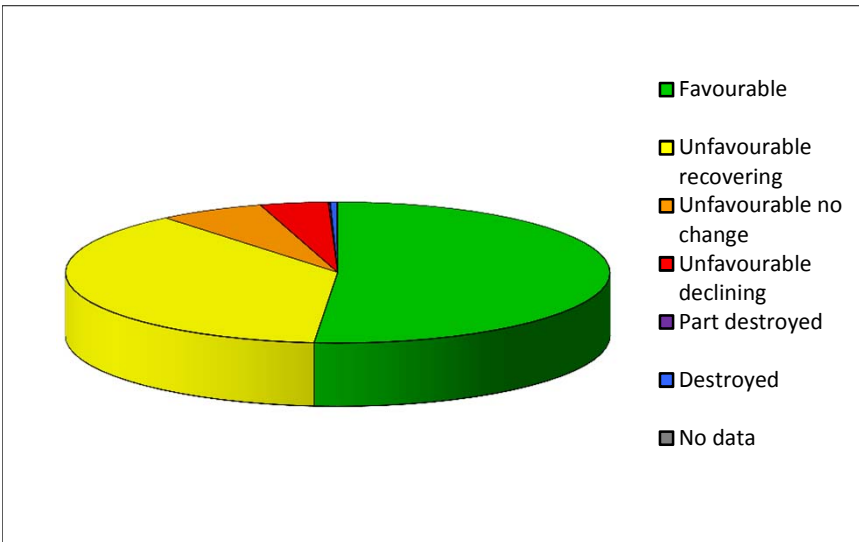
Condition	No. of Units	% of Units
Favourable	23	59.0
Unfavourable recovering	13	33.3
Unfavourable no change	1	2.6
Unfavourable declining	1	2.6
Part destroyed	0	0.0
Destroyed	1	2.6
Total no. of units	39	

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
Total no. of units	358	

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
Total no. of units	4721	

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