

REPORT TO:	Planning Policy Committee 28 November 2023
SUBJECT:	Arun Housing Delivery Test Action Plan
LEAD OFFICER:	Kevin Owen (Planning Policy & Conservation Manager)
LEAD MEMBER:	Cllr Martin Lury, Chair of Planning Policy Committee
WARDS:	All
CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:	
The recommendations supports:-	
<ul style="list-style-type: none"> • Improve the Wellbeing of Arun; • Delivering the right homes in the right places. 	
DIRECTORATE POLICY CONTEXT:	
The proposals will help to enhance the quality of the natural and built environment, protect the district's natural and heritage assets and to promote economic growth in a sustainable manner, striking a balance between the need for development and the protection of scarce resources.	
FINANCIAL SUMMARY:	
There are no direct financial implications arising from the partial update to the Housing Delivery Test Action Plan.	

1. PURPOSE OF REPORT

- 1.1. The report seeks the Committee's agreement to the partial update of the council's Housing Delivery Test Action Plan (HDTAP) through publishing separate Annex to the HDTAP schedule of actions, to be dated 2023 and be uploaded to the evidence base web page.

2. RECOMMENDATIONS

- 2.1 That the Committee agrees the partial update to the council's 'Housing Delivery Test Action Plan' (HDTAP 2023) though publishing an Annex to the schedule of actions and that this be published separately on the council's evidence web page.

2 EXECUTIVE SUMMARY

- 3.1 This report updates the Committee on the council's 'Housing Delivery Test Action Plan' (HDTAP) first published in November 2019 and updated in July 2021. The HDTAP update responds to the Government's annual publication of the Housing Delivery Test (HDT) performance metric for Arun. The most recent metric published for 2021 for Arun was 65% (dividing the previous three years delivery by the previous three years housing requirement). The HDTAP records the actions that the council is undertaking to try to boost housing delivery in until an appropriate HDT test threshold is demonstrated.
- 3.2 The Government has not updated and published the HDT metric this year for 2022 – this may be because of signalled changes to the planning system under the Levelling up & Regeneration Bill (anticipated in January/February 2023). The council has, nevertheless, continued to address housing delivery performance and has sought to obtain signed housing delivery agreements with developers to progress housing schemes. A previous attempt to complete these agreements in 2022 had not been successful but a further attempt was made this summer.
- 3.3 This report, therefore, proposes that there is a partial update to the HDTAP this year, through publishing a separate Annex specifically to update the schedule of actions set out in the HDTAP (see paragraph 4.2 bullet points below).

3 DETAIL

- 4.1 The HDT metric for Arun is reported in the councils Authority Monitoring Report (AMR). In summary, it was.
- 91% November 2018
 - 68% November 2019
 - 61% November 2020 (Published 19 Jan 2021)
 - 65% November 2021 (Published 14 Jan 2022)
- 4.2 The need for the HDTAP was triggered in 2019 because the authority's 2018 HDT metric showed that housing delivery was below the Government's thresholds for housing delivery (95% being the trigger for an Action Plan). The HDTAP was therefore published in 2019 and updated in July 2021.
- 3.1 The HDTAP 2021 sets out a schedule of potential actions (i.e., Proposed Delivery Actions and Opportunities – page 13 - 14 of Background Paper 1) that the authority will undertake to see whether barriers to housing delivery could be identified and overcome to boost housing performance. This report, therefore, only updates the action related to boosting housing trajectories to improve housing performance. One way to do this is to secure signed delivery agreements with site developers, to attempt to ensure housing is delivered when housing trajectories say they will be delivered.

- 3.2 This is the second attempt to do so. The first attempt at producing delivery agreements with developers was undertaken in June and July 2022. However, this did not prove successful with minimal feedback from developers that was insufficient to progress this work.
- 4.5 A further delivery agreements exercise was undertaken by an external consultant for the council in August / September 2023 and included 8 sites that were identified by the council as requiring evidence of site deliverability (as defined in Part B of the National Planning Policy Framework (NPPF 2023 - Background Paper 3)).
- 4.6 In addition to the eight sites that were initially included in the exercise, a further site was put forward by the developers to be included. As a result, nine sites in total were included as part of the Delivery Agreement exercise. Out of these nine sites, six completed proformas were returned and one partially complete proforma.

	Fully Completed Proforma Returned	Partially Complete Proforma Returned	No Detailed Proforma Returned
No. of Sites	6	1	2

- 4.7 Because the HDT metric has not been published for 2022, the HDTAP update is proposed as a partial update to the schedule of actions within the HDTAP by way of an Annex which records the council’s ‘proactive’ approach to working with developers to boost housing supply in Arun. The key action update is:-
- “... seek evidence and diligence on provision accurate housing trajectories...”
(3rd bullet page 13-14 of HDTAP).
- 4.8 This action has been progressed via pursuit of signed delivery agreements through an appointed consultant (See Background Paper 4).
- 4.9 The effect of doing this work is likely to improve the evidence to support Arun’s housing land supply – in particular, the status of deliverable sites which count towards the five-year housing land supply. This is caveated in that the other land supply data is being compiled and further work needs to consider the impact of other factors – such as timescale for delivery of strategic infrastructure. The publication of the AMR in January 2024 will provide the full outcome. The delivery agreements Table 1 below summarise the potential modest improvement in 5-year supply, mainly from strategic sites without permission:-

Table 1: Summary of Pre and Post Delivery Agreements		
	Pre-Delivery Agreement Dwellings	Post Delivery Agreement Dwellings
5-year Commit	522	405
5-year Allocations	1205	1380
5-year Total	1727	1785
Difference		+58

Note: This table 1 shows the housing yield figures based on a five-year trajectory before and after the Delivery Agreement is signed on sites with planning permission (blue) and on site allocations without planning permission (Orange).

- 4.10 The reduction in committed supply may be due to the lead times taken from outline permission to approve Reserved Matters applications or to clear conditions that need to be undertaken prior to construction. The effect of this is to push some housing trajectories beyond the 5-year period (Appendix 1 shows tables for the sites and trajectories pre- and post-delivery agreement).

Conclusion

- 4.11 The result of the delivery agreements work is six fully completed proformas on sites which are anticipated to make a positive impact on housing supply delivery rates by providing signed agreements to evidence housing trajectories. This provides evidence which supports achieving timescales shown for delivery, including where delivery is impacted by lead times and barriers to delivery e.g. subject to critical infrastructure). This work can be used to evidence and update the five-year housing land supply when it is reported in the AMR in January 2024. However, it must be noted that further work will also be needed as part of preparing the AMR which considers sites dependent on strategic infrastructure provision coming forward which may alter stated delivery timescales.

5. CONSULTATION

- 5.1 No consultations have been undertaken.

6. OPTIONS / ALTERNATIVES CONSIDERED

- 6.1 The council can choose to update and publish an Annex to the HDTAP 2023 and upload it to the web site or not to publish the separate Annex but this would conflict with the national policy requirement to demonstrate proactive action to boost housing delivery rates.

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

7.1 The implementation of the recommendations may require further budget resources to commissioned further actions and studies should the situation not continue to improve.

8. RISK ASSESSMENT CONSIDERATIONS

8.1 Implementing the recommendation will minimise the risk that the council will fail to meet national policies.

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

9.1 There are no governance or legal implications arising from the Annex update to the HDTAP 2023 although national policy requires the HDTAP be published until a satisfactory HDT test result is demonstrated.

10. HUMAN RESOURCES IMPACT

10.1 There are no implications arising from the annexe to the HDTAP 2023.

11. HEALTH & SAFETY IMPACT

11.1 There are no implications arising from the Annexe update to the HDTAP 2023.

12. PROPERTY & ESTATES IMPACT

12.1 There are no direct implications for council property.

13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE

13.1 The proposals may help to improve access to housing through appropriate interventions, having a positive impact on community health and wellbeing.

14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE

14.1 There are no direct adverse implications for climate change.

15. CRIME AND DISORDER REDUCTION IMPACT

15.1 There are no direct adverse implications for crime and disorder.

16. HUMAN RIGHTS IMPACT

16.1 There are no direct adverse implications for human rights.

17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS

17.1 There are no implications.

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BACKGROUND DOCUMENTS:

Background Paper 1: Arun Housing Delivery Test Action Plan 2021
<https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n17852.docx&ver=18532>

Background Paper 2: Annex update to HDTAP
<https://www.arun.gov.uk/housing-planning-policy>

Background Paper 3: “National Planning Policy Framework 2023”
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

Background Paper 4: Residential Site Delivery Agreements Lamber Smith Hampton
October 2023
[Housing - planning policy | Arun District Council](#)

Appendix 1: Delivery Agreements 2023

Pre-Delivery Agreements - Large Site Commitments (Sites with Planning Permission at 31st March 2022)

Parish	Planning Ref	Address	Planning App Stage	Strategic Site	Committed Yield	2023/24	2024/25	2025/26	2026/27	2027/28
Arundel	AB/135/20/OUT	Land South of Stewards Rise	Outline Permission with Reserved Matters submitted	No	90	90	0	0	0	0
Barnham & Eastergate	BN/142/20/OUT	Land west of Church Lane (Rear of Cottage Piggeries)	Outline Permission with Reserved Matters submitted	No	200	0	0	0	100	62
Bersted	BE/81/20/OUT	SD3 - Land off New Barn Lane/Morells Farm/ Chalcraft Nurseries (Bognor Regis ECO Quarter)	Outline Permission no Reserved Matters submitted	Yes	20	0	20	0	0	0
Climping	CM/1/17/OUT	Land to the West of Church Lane, South of Horsemere Green Lane & North of Crookthorn Lane (A259) (SD10)	Outline Permission with Reserved Matters submitted	Yes	300	0	25	100	100	25
					Total	90	45	100	200	87
					5 Year Total	522				

Post Delivery Agreements - Large Site Commitments (Sites with Planning Permission at 31st March 2022)

Parish	Planning Ref	Address	Planning App Stage	Strategic Site	Committed Yield	2023/24	2024/25	2025/26	2026/27	2027/28
Arundel	AB/135/20/OUT	Land South of Stewards Rise	Outline Permission with Reserved Matters submitted	No	90	0	18	50	22	0
Barnham & Eastergate	BN/142/20/OUT	Land west of Church Lane (Rear of Cottage Piggeries)	Outline Permission with Reserved Matters submitted	No	200	0	0	0	60	60
Bersted	BE/81/20/OUT	SD3 - Land off New Barn Lane/Morells Farm/ Chalcraft Nurseries (Bognor Regis ECO Quarter)	Outline Permission no Reserved Matters submitted	Yes	20	0	10	10	0	0
Climping	CM/1/17/OUT	Land to the West of Church Lane, South of Horsemere Green Lane & North of Crookthorn Lane (A259) (SD10)	Outline Permission with Reserved Matters submitted	Yes	300	0	25	50	50	50
					Total	0	53	110	132	110
					5 Year Total	405				

The tables above show post-delivery agreements reduction in potential yields in the 5-year totals. This may be due to the time taken to approve Reserved Matters applications or clear conditions that need to be undertaken prior to construction with the effect of pushing yields in trajectories beyond the 5-year period.

Pre-Delivery Agreements - Strategic Allocation Housing (Sites without Planning Permission at base date 31st March 2022)

Parish	HELA A Site Ref	Address	Pending App?	Planning App Ref	Strategic Site	Estimated Yield	2023/24	2024/25	2025/26	2026/27	2027/28	Post 5-year Period
Aldingbourne	WE6	Ryefield Farm & Woodgate Centre, Oaktree Lane (Part of SD5)	Y	AL/107/21/PL	Yes	180	0	0	50	50	80	0
Barnham & Eastergate	BA11B	Fordingbridge Industrial Site & North of Barnham Road 15 Barnham Road (Part of SD5)	Y	BN/195/22/PL	Yes	551	0	50	75	75	75	276
Barnham & Eastergate	NEWE G1	SD5/BEW site (Barnham Eastergate Westergate)	Y	BN/11/22/OUT	Yes	1250	0	0	0	75	75	1100
Bersted	125	Chalcroft Nursery, Chalcroft Lane Bersted (Part of SD3)	Y	BE/134/22/OUT	Yes	2185	0	0	50	125	225	1785
Ford	71	Land at Former Ford Airfield Ford (SD8)	Y	F/4/20/OUT	Yes	1500	0	0	0	75	125	1300
						Total	0	50	175	400	580	

						5 Year Total	1205	
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Post-Delivery Agreements - Strategic Allocation Housing (Sites without Planning Permission at base date 31st March 2022)

Parish	HELAA Site Ref	Address	Pending App?	Planning App Ref	Strategic Site	Estimated Yield	2023/24	2024/25	2025/26	2026/27	2027/28	Post 5-year period
Aldingbourne	WE6	Ryefield Farm & Woodgate Centre, Oaktree Lane (Part of SD5)	Y	AL/107/21/PL	Yes	180	0	0	0	50	50	80
Barnham & Eastergate	BA11B	Fordingbridge Industrial Site & North of Barnham Road 15 Barnham Road (Part of SD5)	Y	BN/195/22/PL	Yes	551	0	63	84	84	84	236
Barnham & Eastergate	NEWEG 1	SD5/BEW site (Barnham Eastergate Westergate)	Y	BN/11/22/OUT	Yes	1250	0	0	75	150	150	875
Bersted	125	Chalcroft Nursery, Chalcraft Lane Bersted	Y	BE/134/22/OUT	Yes	2185	0	0	50	170	170	1795

		(Part of SD3)										
Ford	71	Land at Former Ford Airfield Ford (SD8)	Y	F/4/20/OUT	Yes	1500	0	0	0	75	125	1300
						Total	0	63	209	529	579	
						5 Year Total	1380					

The strategic allocation sites without planning permission at base date show increased yields from housing trajectories post-delivery agreements to come forward within the five-year period. This helps to provide further evidence of site deliverability as required by the NPPF Category B Sites based on the 'Deliverable' definition in the NPPF 2023. However, the caveat is these timescales are still dependent on the successful signing of S.106 Heads of Terms Agreements including specific strategic infrastructure provision being provided to progress site delivery.

Summary of Pre and Post Delivery Agreements		
	Pre-Delivery Agreement	Post Delivery Agreement
5-year Commit	522	405
5-year Allocations	1205	1380
5-year Total	1727	1785
Difference		+58

The summary table above shows that the delivery agreements may enable an additional 58 dwellings (estimated yield) to be included in the 5-year HLS totals as it showed a positive commitment with landowners and developers to produce evidence of signed delivery agreements. This also demonstrates that the council has been proactive in its evidence gathering in order to meet the Category B Definition of a Deliverable Site in the NPPF 2023 and to evidence the council's actions in the HDTAP.