

**PLANNING SERVICES DIVISION:
SECTION 106 CONSULTATION RESPONSE FOR ARUN DISTRICT COUNCIL**

DATE: 1st May 2025

FROM: Naomi Hoyland

DISTRICT/BOROUGH COUNCIL: Arun

Application Number: BR/50/25/PL

The Provision of Service Infrastructure Related to Development at Land at Milton Lodge, 192 Hawthorn Road, Bognor Regis, PO21 2UX

Planning Application details – Change of use from supported living accommodation to 10 No. residential units (Use Class C3), proposed rear extension following demolition of detached building, fenestration changes and associated works. This application is in CIL Zone 4 (Zero Rated) as other development

Summary of Density per Infrastructure Demands

Summary of Contributions

S106 type	Monies Due
Education - Primary	No contribution required
Education - Secondary	£21,452
Education - 6th Form	No contribution required
Libraries	No contribution required
Waste	No contribution required
Fire & Rescue	No contribution required
No. of Hydrants	TBC
TAD	No contribution required
Total Contribution	£21,452

Note: The above summary does not include the installation costs of fire hydrants. Where these are required on developments, (quantity as identified above) as required under the Fire Services Act 2004 they will be installed as a planning condition and at direct cost to the developer. Hydrants should be attached to a mains capable of delivering sufficient flow and pressure for fire fighting as required in the National Guidance Document on the Provision of Water for Fire Fighting 3rd Edition (Appendix 5)

The above contributions are required pursuant to s106 of the Town and Country planning Act 1990 to mitigate the impacts of the subject proposal with the provision of additional County Council service infrastructure, highways and public transport that would arise in relation to the proposed development.

Planning obligations requiring the above money is understood to accord with the Secretary of State’s policy tests outlined by the in the *National Planning Policy Framework, 2019*.

The CIL Regulations 2010 (as amended by the CIL amendment Regulations 2019) came into force on 1st September 2019 and clarify that an authority collecting contributions through the use of S106 agreements may now lawfully charge a fee for monitoring the planning obligations they contain. From 1st April 2024 West Sussex County Council will increase the S106 monitoring fee to £270 per trigger, per year of monitoring. Financial triggers are monitored for an average of three years and will therefore produce a fee of £810 per trigger, with non-financial triggers taking around six years to fulfil and therefore costing £1620.

The basis for this advice is contained in the County Council's adopted Supplementary Planning Guidance document "The Provision of Service Infrastructure Related to New Development in West Sussex – Part 1".

The secondary education contribution has been calculated in accordance with the Developer Obligations for Secondary Contributions in Arun Document 2019, which is a supporting document for the Arun Infrastructure Delivery Plan 2017 (IDP).

All TAD (Total Access Demand) contributions have been calculated in accordance with the stipulated local threshold and the methodology adopted as Supplementary Planning Guidance (SPG) in November 2003.

The calculations have been derived on the basis of an increase in 10 Net dwellings.

Please see below for a Breakdown and explanation of the WSCC Contribution Calculators. Also see the attached spreadsheet for the breakdown of the calculation figures. For further explanation please see the West Sussex County Council website (<http://www.westsussex.gov.uk/s106>).

Deed of Planning Obligations

- a) As a deed of planning obligations would be required to ensure payment of the necessary financial contribution, the County Council would require the proposed development to reimburse its reasonable legal fees incurred in the preparation of the deed.
- b) The deed would provide for payment of the financial contribution upon commencement of the development.
- c) In order to reflect the changing costs, the deed would include arrangements for review of the financial contributions at the date the payment is made if the relevant date falls after 31st March 2026. This may include revised occupancy rates if payment is made after new data is available from the 2021 Census.
- d) **Review of the contribution towards secondary education should be by reference to the information provided in the supplementary Developer Obligations for Secondary Contributions in Arun Document 2019, which is a supporting document for the IDP.**

The Education Authority for West Sussex County Council are objecting to this application because of the lack of availability of local pupil places. However, if the LPA is minded to grant planning permission for the site then the following obligations are required:

The secondary education contributions generated by this proposal shall be spent on a new secondary school serving Arun.

Recent experience suggests that where a change in contributions required in relation to a development or the necessity for indexation of financial contributions from the proposed development towards the costs of providing service infrastructure such as libraries is not specifically set out within recommendations approved by committee, applicants are unlikely to agree to such provisions being included in the deed itself. Therefore, it is important that your

report and recommendations should cover a possible change in requirements and include indexation arrangements whereby all financial contributions will be index linked from the date of this consultation response to the date the contributions become due.

Please ensure that applicants and their agents are advised that any alteration to the housing mix, size, nature or tenure, may generate a different population and thus require re-assessment of contributions. Such re-assessment should be sought as soon as the housing mix is known and not be left until signing of the section 106 Agreement is imminent.

It should be noted that the figures quoted in this letter are based on current information and will be adhered to for 3 months. Thereafter, if they are not consolidated in a signed S106 agreement they will be subject to revision as necessary to reflect the latest information as to cost and need.

Any payment required for a Traffic Regulation Order (TRO) in respect of the proposed development is due either on the commencement of development or receipt of a TRO application to the County Council, whichever is the earlier.

Please see below for a Breakdown of the Contribution Calculators for clarification of West Sussex County Council's methodology in calculating Contributions. For further explanation please see the Sussex County Council website (<http://www.westsussex.gov.uk/s106>).

Breakdown of Contribution Calculation Formulas:

1. School Infrastructure Contributions

The financial contributions for school infrastructure are broken up into three categories (primary, secondary, sixth form). Depending on the existing local infrastructure only some or none of these categories of education will be required. Where the contributions are required the calculations are based on the additional amount of children and thus school places that the development would generate (shown as **TPR- Total Places Required**). The TPR is then multiplied by the Department for Children, Schools and Families school building costs per pupil place (**cost multiplier**).

School Contributions = TPR x cost multiplier

a) TPR- Total Places Required:

TPR is determined by the number of year groups in each school category multiplied by the child product.

$$\text{TPR} = (\text{No of year groups}) \times (\text{child product})$$

Year groups are as below:

- Primary school- **7** year groups (aged 4 to 11)
- Secondary School- **5** year groups (aged 11 to 16)
- Sixth Form School Places- **2** year groups (aged 16 to 18)

Child Product is the **adjusted education population** multiplied by average amount of children, taken to be 13 children per year of age per 1000 persons (average figure taken from 2021 Census).

$$\text{Child Product} = \text{Adjusted Population} \times 13 / 1000$$

Note: The adjusted education population for the child product excludes population generated from 1 bed units, Sheltered and 55+ Age Restricted Housing and Social Rented Housing as a nil child product is assumed for these dwellings. However, this does not apply to calculating the child product for secondary education, where the population from Social Rented Dwellings is included in the Child Product, as per the Developer Obligations for Secondary Contributions in Arun Document 2019.

b) Cost multiplier- Primary and Further Secondary Education Services

The cost multiplier for primary and further secondary is a figure released by the Department for Education. It is a school building costs per pupil place as at 2025/26 updated by Royal Institute of Chartered Surveyors' Building Cost Information Service All-In Tender Price Index. Each Cost multiplier is as below:

- Primary Schools- **£22,587 per child**

- Sixth Form Schools- **£31,066 per child**

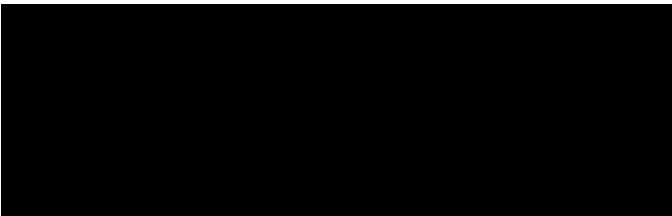
c) Cost multiplier – Secondary Education Services

The cost multiplier for secondary is the cost of providing a new 10FE secondary school for Arun, plus land costs, as outlined in the Developer Obligations for Secondary Contributions in Arun Document 2019. The cost of every additional pupil attending the school is **£41,253** which is used as the cost multiplier.

cc: **Tracey Dunn, WSCC Children and Young People's Services (via email)**

[REDACTED]

WSSC S106 response




Arun District Council, Civic Centre, Maltravers Rd
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www.arun.gov.uk

To register to receive notifications of planning applications in your area please go to
<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...

 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 
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From: Naomi Hoyland [REDACTED]
Sent: 01 May 2025 11:54
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Hannah Kersley <Hannah.Kersley@arun.gov.uk>; Tracey Dunn [REDACTED]
Subject: BR/50/25/PL - Milton Lodge, 192 Hawthorn Road, Bognor Regis, PO21 2UX


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Hi Hannah,

Please find attached our S106 consultation response for the above application. Please don't hesitate to contact me if you have any questions.

Kind regards
Naomi

[Naomi Hoyland](#) | Senior Technician (S106 Monitoring), Planning Services, [West Sussex County Council](#) |
Location: Ground Floor, Northleigh, Chichester, West Sussex, PO19 1RH



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