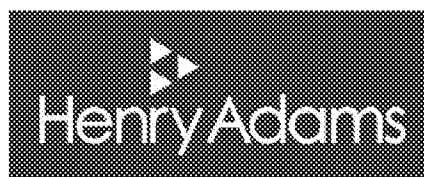


Planning Statement, including Statement of Community Involvement, Draft Heads of Terms & Affordable Housing Statement

Site: Land west of Tye Lane, Walberton

**Proposal: Outline planning application with
all matters reserved, other than means of
access, for the construction of up to 131
dwellings (30% affordable homes) and
amendment to boundary of garden land to
serve adjoining property**

On behalf of David Wilson Homes
December 2021



Henry Adams, 116 South Street, 5th Floor, City Centre, Walsby, SO10 2XU

Town Planning & Development Consultancy



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Appendix:

HA - Appendix 1: Housing Land Supply Assessment submitted in support of recent appeal

1. Introduction

- 1.1. Henry Adams LLP act on behalf of David Wilson Homes in respect of this outline planning application for the construction of up to 131 dwellings, 30% of which would be provided as affordable homes. This application comprises a re-submission application following the refusal of WA/68/20/OUT.
- 1.2. This Statement sets out the relevant background for the determination of this planning application, including context of the site and surroundings, details of the proposed development and an assessment of the relevant planning considerations. The statement incorporates the following:
 - Affordable Housing Statement
 - Draft heads of Terms
 - Statement of Community Involvement
- 1.3. The proposals have been informed by the policies within the National Planning Policy Framework (NPPF), Arun Local Plan, Walberton Neighbourhood Plan and supplementary planning documents.
- 1.4. In addition to this Statement, the following documents are submitted as part of the planning application;
 - Agricultural Land Assessment with Supplemental Letter
 - Arboricultural Survey and Constraints
 - Archaeological Desk Based Statement with Supplemental Statement
 - Desk Based Contamination Statement
 - Design and Access Statement
 - Flood Risk Assessment & Drainage Strategy
 - Ecological Assessments
 - Heritage Assessment and Addendum
 - Landscape Visual Impact Assessment
 - Minerals Resource Assessment and Addendum
 - Transport Statement
 - Travel Plan
 - Walking, Cycling and Horse Riding Assessment and Review
 - Illustrative Drawings

2. **Site and Surroundings**

- 2.1 The site comprises a mix of arable and grazing land to the west of Tye Lane and north of the existing residential areas off The Street. It measures 8.15 hectares (20.1 acres). The site is located on the north side of Walberton, West Sussex. The Street is fronted by residential properties on both sides and Tye Lane has the proposed development site to the west and the Linden homes scheme and Avisford Park golf course to the east.
- 2.2 The Street is an unclassified local road, which runs east to west from Yapton Lane to West Walberton Lane, where it continues to Barnham Lane. The Street is subject to a 30mph speed limit.
- 2.3 Tye Lane is an unclassified local road, which runs north to south from the A27 Arundel Road. Tye Lane is subject to a 30mph speed limit to the south, but changes to 60mph (derestricted) approximately 100m north of the junction with The Street. Tye Lane connects directly to the westbound carriageway of the A27 Arundel Road trunk road (dual carriageway).
- 2.4 The site is located to the north of the village settlement boundary of Walberton, but it abuts the settlement boundary on its southern, eastern and western boundaries. In addition, the Linden housing development to the east is under construction. Once that site is developed, the site would be enclosed on three sides by development.
- 2.5 The site is considered to be well related to the existing village and would comprise a natural extension to the village settlement boundary. The northern boundary is well defined by a mature hedgerow, which would be retained.

Site & Surrounds Planning History

- 2.6 As noted above, this application follows the refusal of a planning application for up to 155 dwellings at the site. Details of the application are summarised below:

Application Reference	Proposal	Decision
WA/68/20/OUT	Outline application with all matters reserved, other than means of access, for the construction of up to 155 No. dwellings (30% affordable homes) & amendment to boundary of garden land to serve adjoining property. This application affects the character & appearance of the Walberton Village Conservation Area, may affect the setting of listed buildings & is a Departure from the Development Plan.	Refused

- 2.7 The application was refused for 8 reasons, many of which are considered to be unreasonable and could be addressed by suitability worded planning conditions. In response to highway matters, ecology and design, the scheme includes a number of changes, including the reduction of dwellings to 131.
- 2.8 Notably, the officer's report accompanying the refused application confirmed the following regarding the principle of development:

Conclusion on Matters of Principle:

The proposed development of up to 155 houses on the site would contribute to the Council's Five Year Housing Land Supply although the principle of residential development on this site is clearly contrary to the policies within the Development Plan.

The policies of the Local Plan that relate to the supply of housing have reduced weight due to the Council not being able to demonstrate an adequate supply of housing land. In addition, policies in the Walberton Neighbourhood Plan that relate to the supply of housing have greater reduced weight because they relate to out of date housing needs as the policies were based on the 2003 Local Plan.

The proposal represents sustainable development and the NPPF 'presumption in favour of sustainable development' is engaged. However, other material considerations which may introduce significant harm set out above, combine to outweigh the benefits of the development in particular the risk of harm on the strategic road network, the A27 preferred route announcement impact on the development itself, and risk to the NDP examination which is to consider alternative sites in order to meet the objectively assessed need and housing requirement for the Parish established by the Arun Local Plan.

For these reasons while the principle of development is supported and the presumption applies, the balance of harm (identified above) outweighs the benefits when considering the NPPF as a whole and the application should be refused.

- 2.9 It is felt that whilst the Neighbourhood Plan has now been Made, the additional information provided addresses the technical and design matters raised in the refusal of the previous application and the Council's Housing Land Supply position (see Section 5 of this Statement) would mean that the recently adopted Neighbourhood Plan should carry limited weight.
- 2.10 There is no planning history relating to the application site. However, the land to the east of Tye Lane is subject to the following planning history:

Application Reference	Proposal	Decision
WA/44/17/OUT	Outline application with some matters reserved for up to 175 dwellings, new vehicular access, together with associated car parking, landscaping & community facilities to include allotments, play	Approved

	space & community orchard.	
WA/95/18/RES	Approval of reserved matters following outline consent WA/44/17/OUT for the erection of 175 No. dwellings, car parking including garages, internal access roads, footpaths, parking & circulation areas, hard & soft landscaping, allotments, play areas/equipment & community orchard & other associated infrastructure & engineering works	Approved and implemented

2.11 In granting planning permission for the development of land to the east of Tye Lane, the Council confirmed the following:

- Site considered to be in a sustainable location;
- The development will make a significant contribution towards market housing and affordable housing in the District, further boosting the sustainability of Walberton; and
- Proposed mitigation planting and location of open spaces would mean that the nature of visual effects would become neutral over time and the site would integrate into the wider landscape.

3. Application proposals

- 3.1 The proposal comprises an outline planning application for the construction of up to 131 dwellings, with all matters reserved, other than means of access. The proposal also includes minor changes to the garden area serving Little Firs, which adjoins the site's southern boundary.
- 3.2 The site would be served via a single vehicular access point onto Tye Lane, approximately 200m north of The Street. The access road would be provided in accordance with design standards. Pedestrian links would be tied into the adjacent site currently being built out by Linden Homes as well as other pedestrian and cycle links onto Tye Lane and Field Close. A pedestrian and cycle link would also be proposed to the northern boundary to connect with the employment premises at Hooe Farm.
- 3.3 30% of the homes (i.e. up to 39 homes) would be provided as affordable dwellings, in a form and tenure that complies with the Council's adopted Local Plan requirements. The proposed housing mix would be detailed as part of any reserved matters submission, but it will reflect the requirements set out within the Strategic Housing Market Assessment and associated update document.
- 3.4 In addition to the above, the proposed development would include:
- Formal and informal public open space – circa 3 hectares
 - Bungalows to southern portion of the site, facing those in Field Close and North Pound on the opposite side of a substantial area of open space
 - Retention of the existing hedgerows within and surrounding the site, with the exception of a break to form connectivity through the site.
 - Children's play areas
 - Extensive landscape buffers to adjoining residential properties
 - Protection of long distance views through the site from The Street
 - Enhancement of the existing Surface Water Drainage management
- 3.5 Matters such as appearance, landscaping, layout and scale are reserved for consideration. However, the principal land use plans have been developed in line with relevant planning policy requirements. This includes the Council's recently adopted Supplementary Planning Documents on Design, Parking and Public Open Space. It is also confirmed that the dwellings will comprise a mix of 1 and 2 storey properties which reflects the scale of development in Walberton.

4. Planning Policy

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 and Section 70 (2) of the Town & Country Planning Act 1990 requires planning applications to be determined in accordance with the policies of the Development Plan unless material considerations indicate otherwise.
- 4.2 To the extent that development plan policies are material to an application for planning permission, the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
- 4.3 The Development Plans for Arun and Walberton comprise:
- Arun Local Plan 2011-2031
 - Walberton Neighbourhood Plan
 - West Sussex Waste and Minerals Plan
- 4.4 The specific policies of relevance to this application are summarised in the list below:

Arun District Local Plan 2011-2031

- AH SP2 Affordable Housing
- C SP1 Countryside
- D DM1 Aspects of form and design quality
- D DM2 Internal space standards
- D SP1 Design
- ECC DM1 Renewable Energy
- ECC SP1 Adapting to Climate Change
- ECC SP2 Energy and climate change mitigation
- ENV DM4 Protection of trees
- ENV DM5 Development and biodiversity
- GI SP1 Green Infrastructure and Development
- HER DM1 Listed Buildings
- HER DM2 Locally Listed Buildings or Structures of Character
- HER DM3 Conservation Areas
- HER DM6 Sites of Archaeological Interest
- HER SP1 The Historic Environment
- LAN DM1 Protection of landscape character
- QE DM1 Noise Pollution
- QE DM2 Light pollution
- QE DM3 Air Pollution
- SD SP1 Sustainable Development
- SKILLS SP1 Employment and Skills
- SO DM1 Soils

- HWB SP1 Health and Wellbeing
- QE SP1 Quality of the Environment
- WM DM1 Waste Management
- T DM1 Sustainable Travel and Public Rights of Way
- T SP1 Transport and Development
- W DM2 Flood Risk
- W DM3 Sustainable Urban Drainage Systems

Walberton Neighbourhood Plan

- CL6 Health Care
- CL7 Recreation Facilities
- GA1 Open Access and Permissive Paths
- GA2 Footpath Bridleway and Cycle Patch Network
- GA5 Traffic Management
- GA6 A27/A29 Junction West, and Other Strategic Junctions
- HP1 Built Up Area Boundary
- HP10 Affordable Housing
- HP11 Housing Density
- HP13 Design Guidance
- VE3 Protection of Trees and Hedgerows
- VE4 Conservation Areas and Areas of Special Character
- VE5 Buildings and Structures of Character
- VE 6 Protection of Watercourses
- VE7 Surface Water Management
- VE8 'Unlit village' status
- VE10 2020 Biodiversity Corridors
- VE13 2020 Distinctive views and vistas

Joint West Sussex Minerals Local Plan

- Policy M9

- 4.5 The Walberton Neighbourhood Plan (NP) was Made (adopted) in March 2017 on the basis of the saved policies in the ADLP and the draft policies in the emerging Arun Local Plan (2014). Since its adoption, the District Council adopted the Local Plan 2011-2031 in July 2018. Given that that the Walberton Neighbourhood Plan was adopted in advance of the more recently adopted Local Plan, the Parish Council has been reviewing this document in order to make it conform with the Local Plan and its associated housing requirements.
- 4.6 Following the refusal of the planning application, the draft Walberton Neighbourhood Plan has proceeded to referendum (6th May 2021). The NP passed referendum and it is expected that the NP will now be 'Made' by the District Council.

Status of the Development Plans

- 4.7 The current Development Plan is considered to be incomplete as it fails to provide a robust strategy for delivery of circa 1,250 additional housing allocations across the District during the plan period. The Local Plan 2018 sets a minimum requirement for at least 1,250 homes to be allocated either through a Non-Strategic Sites Development Plan Document (allocations of less than 300 homes) or Neighbourhood Plan review. At this stage, Arun has not progressed any further work on a Development Plan Document.
- 4.8 Save for an initial report to the Council's Planning Committee in December 2018, no further work has been completed to secure a strategic approach to the additional housing requirement and therefore no policy document is in place to ensure all Neighbourhood Plans are reviewed and the appropriate level of housing sites identified. The Committee report intended to set out a housing distribution across the District and confirm which party would be responsible for delivering the required housing allocations (Neighbourhood Plan or Development Plan Document). The process was then expected to set a clear timeline for the relevant allocations to be adopted and if stalled in the Neighbourhood Plan process, the Development Plan Document would take over to ensure housing delivery was maintained.
- 4.9 In light of the above, it is accepted that there is conflict with other policies of the development plan, in particular the Neighbourhood Plan, but this must be balanced by the fact that the Development Plan is incomplete. The Council is facing a cliff edge in its ability to meet its housing need and (as set out above) it cannot currently demonstrate a 3-year, let alone a 5-year housing land supply or sufficient delivery.
- 4.10 The Council also begun work on a Local Plan Review. On the 6th of October 2021, it was decided at Planning Policy Committee that this work will be put on hold also this is despite the Chief Planning Officer advising strongly against such a decision in light of the Council ever decreasing housing land supply.
- 4.11 Furthermore, there are other significant material considerations, such as the acute need for affordable housing and the site-specific merits of the application proposal that weigh, in the balance, in favour of the scheme.

Supplementary Planning Documents

- 4.12 In terms of Supplementary Planning Documents (SPDs), the following adopted documents are relevant to this appeal:
- Arun District Design Guide SPD - 2021
 - Arun District Council Parking Standards SPD - 2020
 - Arun District Council Public Open Space, Playing Pitches and Built Facilities SPD - 2020
 - Arun District Council Interim Housing Statement - February 2021

National Planning Policy Framework and Guidance

- 4.13 At national level, the National Planning Policy Framework 2021 (NPPF) sets out the Government's most up-to-date policies against which all Development Plans should be prepared and planning applications assessed. It is a material consideration that carries substantial weight.
- 4.14 The Framework sets out at paragraph 8 the three overarching objectives which comprise economic, social and environmental considerations. The same paragraph confirms that these objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives). The paragraph does not, however, state that net gains must be achieved across all three objectives for a proposal to constitute sustainable development.
- 4.15 The presumption in favour of sustainable development is set out at Paragraph 11, which the Government maintains is at the heart of the Framework. For decision-taking, the presumption in favour of sustainable development means:
- c) Approving development proposals that accord with an up-to-date development plan without delay; or
 - d) Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. The application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'
- 4.16 It is particularly relevant to note that point (i) confirms that applications should only be refused if there is a clear reason for refusing development. The application site does not include, is not adjacent to, nor does the proposal impact negatively upon any of the following designations listed in footnote 6:
- Sites of Special Scientific Interest;
 - land designated as Green Belt,
 - Local Green Space,
 - an Area of Outstanding Natural Beauty,
 - a National Park or defined as Heritage Coast;
 - irreplaceable habitats;
 - designated heritage assets or heritage assets of archaeological interest; or
 - areas at risk of flooding or coastal change
- 4.17 In this regard, there are no clear reasons for refusing the development in light of the guidance at paragraph 11 and footnote 6 of the NPPF.

- 4.18 With regard to the delivery of new housing, Paragraphs 74 and 75 deal with the requirement for Local Planning Authorities (“LPAs”) to 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.
- 4.19 Footnote 7 on Page 6 of the NPPF confirms that where an LPA cannot demonstrate a 5-year supply of deliverable housing sites, the housing supply policies will be considered out of date for the purposes of applying Paragraph 11 (d).
- 4.20 As the Council cannot currently demonstrate a 5-year HLS, paragraph 11 (d) of the NPPF and the application of the ‘presumption’ for sustainable development is engaged. This means that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date (such as where the local planning authority cannot demonstrate a five year supply of deliverable housing sites), planning permission should be granted. The only caveat to this is set out above under paragraph 11 d i) and ii) neither are considered to apply to the appeal scheme.
- 4.21 In terms of Neighbourhood Plans, paragraph 14 of the NPPF states that in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:
- a) The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
 - b) The neighbourhood plan contains policies and allocations to meet its identified housing requirement;
 - c) The local planning authority has at least a three-year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
 - d) The local planning authority’s housing delivery was at least 45% of that required over the previous three years.
- 4.22 In determining the application, it is the applicant’s view that criteria b) and c) above do not apply. Accordingly, the 4 tests listed at paragraph 14 are not met. The result of this is that the conflict with the Neighbourhood Plan is not considered to significantly and demonstrably outweigh the benefits of the scheme.
- 4.23 The NPPF goes on to state that when applying the presumption in favour of sustainable development, arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:
- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

National Design Guide

- 4.24 In October 2019, the Government published the National Design Guide (NDG) to illustrate how well-designed places that are beautiful, enduring and successful can be achieved in practice. It forms part of the Government's suite of planning practice guidance. In addition to informing development proposals and their assessment by Local Planning Authorities, it supports paragraph 13 of the NPPF which states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 4.25 Whilst the detailed layout and appearance of the scheme is reserved, the indicative masterplan demonstrates a constraints led approach to the development of the site, in accordance National and Local Design Guidance.

5. Housing Land Supply

- 5.1 This application is supported by a detailed housing land supply assessment, included at Appendix 1 of this statement. This considers the overall housing supply position and sources it relies on. Below comprises a summary of the findings.

Five- year period

- 5.2 The Council's current assessment of 5-year housing land supply is set out in its Annual Monitoring Report ("AMR") dated December 2020 and has a base date of 01 April 2020. This represents the most up-to-date assessment undertaken by the Council.
- 5.3 It is considered that the correct five-year period for present purposes is to be 01 April 2021 – 31 March 2026.

Local Plan Requirement

- 5.4 Paragraph 005 of the Housing Supply and Delivery section of the PPG is clear that the requirement should be calculated using the Local Plan where this was adopted in the last 5 years. Given that the Local Plan was adopted in 2018, we remain within that 5-year period and the housing supply should be calculated on the basis of the requirements of the Local Plan.
- 5.5 On the basis of the Local Plan being adopted in the last 5 years, the starting point for the calculation of 5-year supply is 1,310 dwellings per annum¹. This equates to a requirement for 6,550 homes to be delivered over the next 5-year period highlighted above, excluding any unmet need or buffer resulting from the Housing Delivery Test.
- 5.6 On the basis of the above, the Council's housing requirement for the 5-year period comprise:
- i. Local Plan annual requirement
 - ii. Shortfall over the past plan period (2011-2021)
 - iii. Appropriate Buffer (applied to annual requirement and shortfall figure)

Previous Under Delivery

- 5.7 Paragraph 031 of the PPG states that the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5-year period (the Sedgefield approach), then the appropriate buffer should be applied.
- 5.8 The Council's December 2020 AMR, confirmed that the shortfall in housing delivery to the base date was 2,039. This was on the basis of the available information up until April 2020. In January 2021, the 2020 HDT figure was published. On the basis of the AMR

¹ Local Plan 2018 – Policy H SP1 – Table 12.2

having an April 2020 base date, it is not considered that this shortfall has been accounted for.

- 5.9 This under supply should be added to the shortfall. The Council had a requirement for 1,120 homes to be delivered in 2020, however, they only delivered 515 homes in that year, resulting in a shortfall in delivery of 605 homes in 2019/2020. As a result, the shortfall for the purposes of the housing land supply assessment should be 2,650 homes.

Buffer

- 5.10 The Buffer is calculated by reference to the most recent HDT measurement published by Government, which in this case is the 2020 HDT published in January 2021. Where the HDT measurement is less than 75%, a 20% Buffer should be added to the housing requirement figure to ensure choice and competition in the market for land.

- 5.11 The results of HDT measurement for Arun, since 2019 are produced below:

Year	Arun DC's HDT Result
2018	91%
2019	68%
2020	61%

- 5.12 On the basis of the above, the buffer applied should be 20%.

Housing Requirement for the five year period 2021-2026

- 5.13 In applying the three elements to the housing requirements for the five year period, 2021 – 2026, the housing requirement for the District is set out below:

	Element of Supply	ADC – AMR position	Henry Adams
1.	Local Plan Trajectory requirement	6,360	6,550*
2.	Shortfall over past plan period – 2011 – 2020**	2,039	2,650 (including 2020 shortfall)
Total			9,200
3.	Buffer (20%)	1,680	1,840
	Total Requirement 2021-2026*	10,269	11,040
4.	Annual Requirement (1 +2 +3 /5)	2,054	2,208
5.	Deliverable supply	6,599	4,421
6.	5 year Housing Land Supply	3.3 years**	2 years

*updated to reflect requirement for 2021 – 2026 Local Plan Trajectory period (1,310 dpa)

**in undertaking a calculation of the Council's figures in the December 2020 AMR, the Council's Housing Land Supply position calculates at 3.21 years (6,599 / 2,054 = 3.21)

- 5.14 The Council's Action Plan sets out the reasons for the lower projected delivery. This includes planning delays on some Strategic Allocations; poor quality schemes delaying approvals; developers unable to meet stated and committed timescales; strategic site applications not coming forward as anticipated and developer/market factors outside of local authority control.
- 5.15 The Council's Action Plan was published in June 2019 and makes a series of recommendations in order to boost housing delivery. This includes use of the 'presumption in favour of sustainable development' until such time as the 5-year housing land supply is re-established. It recommends that applications be invited from landowners/developers on 'deliverable' HELAA sites to re-establish the 5-year housing land supply.
- 5.16 The release of further land for housing will help to maintain delivery rates. This may have to include sites outside the built-up area boundary and it would be preferential if such sites were located close to the edge of the BUAB and in sustainable locations which minimise the need to use the private car.

6 Scheme Assessment

- 6.1 This section sets out the merits of the scheme and its general compliance with national and local planning policy.

Principle of Development

- 6.2 As set out above, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the plan unless material considerations indicate otherwise. The development plan for Arun currently comprises the Arun Local Plan and Walberton Neighbourhood Plan.
- 6.3 It is considered that all development policies that relate to the supply of housing in the Arun Local Plan 2011-2031 (Policy C SP1 Countryside) have significantly reduced weight because Arun District Council are unable to demonstrate an adequate supply of housing land (somewhere between 2-3 year supply against their 5 year requirement, with the applicant's position being 2 years). Policies in the Walberton Neighbourhood Plan that relate to the supply of housing (Policy HP1 Built Up Area Boundary) also carry significantly reduced weight because they relate to out of date housing needs as the policies were based on earlier draft versions of the Local Plan.
- 6.4 Owing to the current Housing Land Supply position and advice contained within paragraph 11 of the NPPF, it is considered that the presumption in favour of sustainable development applies. Thus, the Council must first consider whether there is a clear reason to refuse a planning application. In this case, there is no clear reason and therefore the application of the presumption in favour of sustainable development means that consent should be granted.
- 6.5 The first circumstance that should be considered, owing to the recently Made Neighbourhood Plan, is the advice contained at paragraph 14 of the NPPF. The applicant believes that the housing numbers identified in the Neighbourhood Plan have not been justified or subjected to any significant examination as part of the Neighbourhood Plan review process. The applicant is also of the view that the housing land supply position is significantly below a 3 year supply, as set out in paragraphs 5.17 and 5.18 above. The result of the above means that criteria b) and c) of paragraph 14 are not met and the provisions of paragraph 14 do not apply.
- 6.6 In terms of application of the presumption in favour of sustainable development, it is submitted that the proposal represents sustainable development and the NPPF 'presumption in favour of sustainable development' is engaged. This is established in the officer's report and by the recent approval of the following planning applications:
- Y/83/19/OUT – Clays Farm, North End Road (January 2020)
 - A/122/19/OUT – Land off Arundel Road, Angmering (March 2020)
 - Y/121/19/PL – The Steddles, Yapton (August 2020)
 - WA/79/20/PL – Spindlewood, Walberton (August 2021) (appeal decision – ref: APP/C3810/W/21/3269025)

6.7 Of most relevance is the recent appeal at Spindlewood. This is a decision relating to a site in the parish of Walberton and post-dates the Neighbourhood Plan. In this case the Inspector concluded that the proposals would run counter to the spatial strategy of the Local Plan. It was also concluded that the agreed position at the appeal was that the Council were only able to demonstrate a 2.7 year supply of housing, which the Inspector confirmed was 'significantly short' of what was required.

6.8 The site was considered for development purposes as part of the Neighbourhood Plan Review. The site was considered in the Site Options Assessment (Prepared by AECOM, February 2020. It identified the Spindlewood site as 'Site 1' and concluded that it be rated as unsuitable for development, due to the following comments:

This site is a mix of greenfield and previously developed land with one existing dwelling and its curtilage. It is located adjacent to a recently built development of a brownfield site, however is not within or adjacent to the built up area boundary (BUAB). The site is proposed for 5 dwellings (net 4).

There is vehicular access, however there is no current pedestrian footpath along the access road, Yapton Lane.

The site is located within a SSSI Risk Impact Zone; however, this would not prevent development. The site is within the Fontwell Upper coastal plain which is characterised as gently undulating enclosed by woods with numerous hedgerows with a view to the higher ground of the Downs to the north. Development of the site may therefore have low landscape and visual impact, although this would need to be verified by specialist landscape appraisal.

Planning Application WA/33/18/OUT was refused in September 2018 due to the location outside the BUAB and its encroachment onto the countryside.

The site is not suitable for allocation in the neighbourhood plan as it does not meet Policy C SP1 or Policy SD SP2 due to its location outside the BUAB. A lack of safe pedestrian access would also be a constraint to development.

6.9 In the context of the above, the Inspector concluded the following at paragraphs 19-23 of the appeal decision:

*20. An important material consideration is the policy set out in paragraph 11 of the revised Framework. In relation to footnote 8 of the revised Framework, the Council acknowledges **that it is only able to demonstrate 2.7 years of housing land supply, which is significantly short of the 5 years' supply expected** by national planning policy. Furthermore, the 2020 housing delivery test shows only a 61% delivery rate, which is substantially below the housing requirement for the previous 3 years.*

21. On either metric, the policies which are most important for determining the appeal must be considered out-of-date. In such circumstances the Framework says that permission should be granted unless policies within the Framework that protect areas of particular importance provide a clear reason for refusal, which they do not, or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the

*policies in the Framework taken as a whole. **Given the acute shortfalls in housing land supply and housing delivery I give this material consideration significant weight.***

22. For housing development that conflicts with a neighbourhood plan, as here, paragraph 14 of the Framework says that the conflict is likely to significantly and demonstrably outweigh the benefits provided 4 tests are met. In this case the third test, which requires a local planning authority to have at least a 3 year supply of housing land, is not met and so the provisions of paragraph 14 do not apply.

23. Balancing these matters against one another, I conclude that the limited harm identified, including the conflict with the development plan when taken as a whole, would not significantly and demonstrably outweigh the benefits having regard to the acute lack of housing supply. It follows that the weight in favour of the development is greater than the weight against it. Consequently, I consider that the appeal should be allowed and planning permission granted in this instance. (emphasis added)

- 6.10 The Inspector's decision advocates the same approach albeit the applicant's position is that the Council's housing land supply is even lower than the Inspector considered at the above appeal and the appeal scheme contributes significantly more homes to meet the significant demand. Another recent appeal decision confirms the correct approach where there is a recently Made Neighbourhood Plan, for a development site in Paignton, Devon. This proposed a scheme of 400 dwellings on green field site adjoining a settlement boundary, but not allocated for development purposes and the housing supply fell below 3 years. With the decision, the Inspector confirmed the following:

94. The Council is not able to demonstrate a 5 year supply of deliverable housing sites (5 year HLS). As such, and notwithstanding the BPNP housing requirements being exceeded, in relation to paragraph 11(d) of the Framework those policies which are most important for determining the application are out-of-date. Furthermore, having regard to paragraph 11(d)(i) of the Framework, the limited harm that I have found would be caused to the integrity of the AONB, relating to its setting, would not be significant enough to provide a clear reason for refusing the development proposed. The tilted balance in paragraph 11(d)(ii) of the Framework is therefore engaged. Furthermore, as the Council is also not able to demonstrate a 3 year HLS, paragraph 14 of the Framework concerning the tilted balance is not engaged.

- 6.11 This and the other material considerations set out below combine to outweigh the conflict with the policies of the development plan and serve to allow for the principle of the application to be supported.
- 6.12 The proposed development of up to 131 homes would provide a substantial contribution to housing supply (equating to approximately 0.14 year supply). The tenure and form would make a significant contribution to the availability of affordable homes, alongside market homes. Housing provision in this form is therefore considered a significant benefit that weighs in favour of the proposed development.
- 6.13 The site has been considered in the Council's most recent Housing Economic Land Availability Assessment (HELAA). This concludes that the site is 'Developable'. During the

course of the determination of the previous application, the council updated its HELAA (December 2020) in which it altered its previous findings for the site, changing the past assessments of the site's suitability for development from 'Deliverable' to 'Developable'. There was no clear justification for the change in conclusion. The site has continued to be promoted for development and is readily available. The only circumstantial change is the proposal to deliver the A27 bypass through part of Walberton Parish. Whilst a consideration, it is considered that this is not yet a committed road scheme but doesn't affect the deliverability of the applicant's site.

- 6.14 The conclusions of the 2019 HELAA and revised conclusions from the 2020 HELAA documents are produced below:

2019 – HELAA ref: 17WA1 (Deliverable)

The site is outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, from the information available, the site is considered suitable in principle for future housing potential, because of its accessibility to facilities, job opportunities and public transport, and because there are no insurmountable constraints. The site could contribute to the creation of a sustainable, mixed community.

2020 – HELAA ref: 17WA1 (Developable)

The site is outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, from the information available, the site is considered suitable in principle for future housing potential, because of its accessibility to facilities, job opportunities and public transport, and because there are no insurmountable constraints. The site could contribute to the creation of a sustainable, mixed community.

- 6.15 As can be seen from the above, the Council's conclusions remain the same in both 2019 and 2020 HELAA reports, however, inexplicably the conclusion is different. It is our view that the unjustified changed HELAA classification should not hold any more than negligible weight as the site circumstances have not changed at all, and applicant remains committed to the delivery of the site over the next 5 year period, should permission be granted.
- 6.16 In terms of the evidence to the Neighbourhood Plan Review, the Strategic Environmental Assessment (SEA) confirmed that the inclusion of the application site comprised a reasonable alternative and it was considered as 'Option 5' in the SEA. There was no clear favourite in terms the options considered. The application scored more highly with regards to biodiversity and visual impact, but the SEA concluded that it was least suitable in terms of flooding and drainage, despite the site being in Flood Zone 1 and clear evidence that was available at the time that an appropriate drainage design could improve surface water flooding issues downstream. The SEA does provide some helpful evidence on the application sites suitability but does not provide any clear recommendations of an overriding favourite.

- 6.17 The site was also considered in the AECOM Site Options Assessment document prepared in support of the Neighbourhood Plan Review. This concluded that the site be given an Amber rating. This meaning that the site has constraints that would need to be resolved and if addressed the site would be suitable for development. The summary from that report is produced below:

Suitable: The site is outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. However, from the information available, the site is considered suitable in principle for future housing potential, because of its accessibility to facilities, job opportunities and public transport, and because there are no insurmountable constraints. The site could contribute to the creation of a sustainable, mixed community. The site was promoted in the 2018 HELAA call for sites process, and is therefore considered available for the purposes of this assessment

- 6.18 The only constraint highlighted was the site's location outside of the settlement boundary. As set out elsewhere in this report, such a constraint would carry very limited weight given the Council's housing land supply position and subsequently out of date planning policies. The reason for highlighting the above evidence document is of relevance to the decision making for this site and that of the decision by the Inspector considering the Spindlewood appeal. The Spindlewood site was considered 'unsuitable' for development by the Neighbourhood Plan but allowed at appeal. In comparison, the application site was considered suitable.
- 6.19 The proposal has been designed to respect the site's edge of settlement location in order to minimise the impact of development upon adjoining properties. This will also ensure that views in to and out of the site to the countryside beyond could be achieved as part of the detailed design considerations.
- 6.20 As noted above, some policies of the NPPF are cast in terms which indicate that in certain circumstances planning permission should be restricted. In this case, these relate principally to the National Park and natural environment. Having regard to the tests set out in the NPPF in relation to these issues, and in the context of the content of this report, it is considered that the circumstances are such that none of these issues amount to a reason for withholding planning permission.
- 6.21 It is considered that these material considerations overcome the out-of-date policies in the Development Plan and the principle of development should be supported.

Sustainability of Location

- 6.22 The development will incorporate a strategy for sustainable design, which encourages the reduction of energy consumption. The full details of this will be considered and presented as part of the reserved matters submission.
- 6.23 In terms of the site's location, Walberton comprises a sustainable settlement, with direct access to keys services and facilities. The following facilities are available in the local area within walking distance of the site:

- Walberton and Binstead C of E Primary School – 450 metres;
- Walberton Pre-School – 400 metres;
- Walberton Village Hall and sports pitches – 450 metres;
- Post office, newsagent, greengrocer, laundrette, hairdressers and dental surgery – 550 metres;
- Flintcroft GP Surgery – 550 metres;
- St Mary's Church – 640 metres;
- Walberton Baptist Church and Church Hall – 210 metres;
- The Holly Tree (350 metres) and the Black Horse (1.9 km) Public Houses;
- Walberton Recreation Ground – 450 metres;
- Hooe Farm Industrial Park - 280 metres; and
- Hilton Avisford Park Hotel and Golf Club – 1.6km.

- 6.24 The nearest railway station is at Barnham which is 1.8 miles south west of Walberton with regular services to settlements throughout West Sussex and beyond to London, Portsmouth, Southampton and Bristol. This is accessible via dedicated off-road cycle route which links Barnham and Walberton.
- 6.25 The proposed development will benefit from pedestrian and cycle links with the surrounding area. This will ensure connectivity with the existing footpath network and enhance the connection between The Street and the Hooe Farm Industrial estate to the north of the site. The proposal also includes a proposal for a pedestrian crossing on The Street, east of Tye Lane.
- 6.26 The site is easily accessible and sustainably located allowing any future residents a choice of services and facilities and excellent access to public transport.
- 6.27 The site's location is therefore highly sustainable, which was confirmed in the officer's report on WA/68/20/OUT.

Access and Movement

- 6.28 A Transport Statement has been prepared to support the Planning Application, which has been submitted to demonstrate the acceptability of the proposed development in highways terms.
- 6.29 The proposed development will be served by a vehicle access from Tye Lane, in the form of a priority junction. Pedestrian and cycle access would also be provided to connect with Tye Lane and the adjacent Linden Homes scheme. To the south-west of the site, pedestrian and cycle access would also be available via Field Close and to the north onwards towards Hooe Farm Industrial Estate. The Transport Assessment demonstrates that these points of access are suitable and safe to accommodate the proposed development.
- 6.30 As set elsewhere in this report, the Transport Assessment confirms that the site's proximity to existing local amenities, pedestrian, cycle, public transport and equestrian

networks, presents a good opportunity to encourage the use of sustainable transport and create a sustainable development. The Assessment goes on to confirm that many of the local facilities are within desirable walking distances and access to these is considered to be safe for existing and future residents.

- 6.31 The Transport Statement demonstrates that the scheme is expected to generate 84 vehicle movements in the AM peak period (08.00-09.00), 89 vehicle trips in the PM peak period (17.00-18.00) and 766 vehicle trips across a 12 hour period. To consider the impact of this, comprehensive assessments of local junctions has been undertaken to determine the impact of the proposed development on their operation. Each junction has been demonstrated as operating within capacity with the addition of the proposed development.
- 6.32 The Transport Assessment demonstrates that the proposed development will not have a 'severe' impact on the operation, capacity or safety of the local road network. Severe impact being the key policy test set out at paragraph 109 of the NPPF.

Flood Risk and Drainage

- 6.33 The site is located within Flood Zone 1 (low probability of flooding), as defined by the Environment Agency Flood Mapping system. As such, the proposal accords with the objectives of the NPPF to locate development in such locations.
- 6.34 The Environment Agency map of historic flood incidents identifies a short section of The Street and Barnham Lane approximately 150m to the south of the site which has historically suffered localised flooding but does not identify any historic incidents directly affecting the site.
- 6.35 In terms of surface water drainage, due to the ground conditions and presence of high groundwater encountered within the ground investigation undertaken, infiltration of surface water to ground is deemed unsuitable. A suitable sustainable drainage system is proposed, which accords with the requirements of national and local policy.
- 6.36 In order to prevent increased flood risk in off-site locations, the applicant's drainage consultants have undertaken preliminary calculations that indicate that surface water runoff generated by the proposed development can be attenuated on site for all rainfall events up to the 1:100 year event including an allowance for climate change. The surface water drainage strategy also proposes that water quality improvement will be provided to mitigate against any risk to the existing watercourses.
- 6.37 The proposed drainage measures ensure that both the proposed and the nearby properties will not be at risk of flooding following construction of the development. The proposal would therefore be aligned with relevant local and national policy guidance.
- 6.38 It is noted that the planning officer raised concern regarding the level of drainage detail provided in the refused application. However, following correspondence with the Council's drainage engineers, it was confirmed that the detailed design could be appropriately secured by condition.

- 6.39 Foul drainage from the development will discharge via gravity into one of two available existing Southern Water public foul sewers which are located beneath Tye Lane and Field Close adjacent to the site.

Landscape and Trees

- 6.40 A comprehensive assessment of the site and landscape character is included in the Landscape Visual Impact Assessment (LVIA) submitted as part of the application documents. This highlights a landscape strategy for the site, its landscape sensitivity and the impact of the development on landscape character.
- 6.41 The LVIA concludes that the site would be considered semi-rural in character however, residential dwellings to the southern and south-western edges and an equestrian land use to the north-east and east mean there is also a distinct suburban quality.
- 6.42 The Assessment then goes on to confirm that as a 'green field' site, it is accepted there would be substantial adverse landscape character impacts as a result of the proposed scheme as new residential dwellings and associated access roads would permanently change the character of the fields west of Tye Lane. It is considered that these adverse impacts would be largely constrained to the proposed development site area due to the enclosed character which would be maintained by the retention of boundary vegetation. Likewise, the perceptibility of the proposed scheme from locations out-with of the proposed development site would be limited by retained vegetation and existing residential dwellings.
- 6.43 The indicative scheme layout incorporates substantial green buffers to the south-western, southern and eastern boundaries, offering extensive opportunities for new planting and habitats which would enhance biodiversity and green infrastructure. Where feasible, all the existing boundary trees and hedgerows would be retained, thereby maintaining the existing constrained and enclosed landscape character. In addition, the proposed massing of single and two storey dwellings would be arranged so as to limit impact with regard to the gradual rise in topography to the north.
- 6.44 It is also considered the proposed scheme would offer substantial scope to improve the existing ecological condition from the current intensive arable / equestrian land-use which offers limited opportunities for biodiversity.
- 6.45 A landscape corridor would be established to the centre of the site area running north-south, maintaining and framing views to the retained, large trees to the north from locations to North Pound. New pedestrian links would be incorporated to the southern edge (via Field Close) enabling residents to walk to the centre of Walberton.
- 6.46 Residential frontages and access routes would be enhanced with tree and hedgerow planting. This would soften and filter near and mid-distance views and provide seasonal change.

- 6.47 The Assessment concludes that the majority of visual receptors would have low or moderate visual effects. Overall, it is considered that the proposed scheme could be accommodated within the fields immediately west of Tye Lane without undue harm to existing landscape character and visual amenity of the wider landscape north of Walberton.
- 6.48 The effect on visual receptors is a matter that is in our view clearly outweighed by the significant benefits of the scheme. The landscape effect is also limited to the immediate site and does not harm the wider landscape character and amenity of Walberton.

Ecology and Biodiversity

- 6.49 A Preliminary Ecological Appraisal (PEA) and Phase 1 Habitat Survey was completed in February 2018 to inform a planning application for a residential development. This was followed by protected species surveys at the site throughout 2018. A further site visit was undertaken by the project ecologist on the 13th August 2020. The purpose of this was to determine whether there have been any significant changes to the habitat condition at the site in the intervening period.
- 6.50 The further walkover survey revealed that the habitats present at the site have not significantly changed since the original Phase 1 Habitat Survey and Phase 2 protected species surveys were undertaken in 2018.
- 6.51 In response to the site specific survey work, a Mitigation and Enhancement Strategy has been prepared to set out the measures proposed to protect and enhance the wildlife value at the site through the life of the development project. This includes measures put in place during the design of the scheme to retain and protect existing habitats of high value, prescribe mitigation measures to prevent impacts to protected or notable species and to create and appropriately manage new high value habitats for the benefit of targeted wildlife and wider biodiversity.
- 6.52 The Ecological Appraisal concludes that through the implementation of the safeguards and recommendations set out within their report, any development proposals will accord with planning policy with regard to nature conservation at all administrative levels and the appropriate requirements can be secured through appropriately worded conditions and reserved matters approval. It is also considered that biodiversity net gain can be achieved on-site.
- 6.53 As indicated in NPPF Paragraph 180(d), these ecological enhancements are a matter that weigh in favour of developing the site.

Agricultural Land Assessment

- 6.54 The application is supported by a land quality assessment which considers characteristics of the land and its agricultural quality. Agricultural land is graded as follows:
- Grade 1 - excellent quality agricultural land
 - Grade 2 - very good quality agricultural land

- Grade 3 - good to moderate quality agricultural land
 - Subgrade 3a - good quality agricultural land
 - Subgrade 3b - moderate quality agricultural land
- Grade 4 - poor quality agricultural land

- 6.55 The Assessment considers the quality of land in comparison to other land within the vicinity. Surrounding land, particularly to the south, is well above average when considering the country as a whole. However, the application site would be classified as Grade 3a at best and therefore has to be considered as good to moderate quality agricultural land with moderate limitations. It is considered average for the locality given the amount of Grade 1 and 2 soils in the area.
- 6.56 The assessment also highlights some major constraints on the use of the site that need to be taken into consideration. The existing access to the arable parcel is very limiting for modern agricultural machinery. In terms of economies of scale, the size of agricultural and horticultural units and the total area here amounts to circa 4.96 ha. Sprayer booms can be 26m in width and the combine header 9.15m. It is suggested that with the size of modern machinery, ignoring the access implications, farming of arable parcels of this size is becoming more problematic. Due to the stone content the arable parcel is not of a suitable quality to grow potatoes or field vegetables.
- 6.57 The Assessment also highlights that smaller horticultural growers have ceased operating, and the larger growers have only enlarged their operations and therefore this area is again too small for modern horticultural use.
- 6.58 The Assessment concludes that the Land Classification would indicate that the land is good to moderate quality (3a). However, there are limitations which, in relation to the arable parcel due to its access and location, will only escalate in the future. The grassland used for equestrian use is in a poor condition but could be grazed by sheep or cattle and in terms of agricultural productivity is minimal. Therefore, the loss of this parcel of land as a natural resource is minimal.
- 6.59 Given the above the application is consistent with relevant provisions in the NPPF concerning agricultural land (in particular paragraphs 174(b), 175, and footnote 58).

Heritage Statement

- 6.60 The application is informed an archaeological and heritage appraisal to consider above and below ground heritage assets. The report identifies the following:
- The site lies within a modern fieldscape and is not covered by any heritage designations;
 - A high potential for buried archaeological deposits of prehistoric and Romano-British date has been identified, with a similar potential for former post-medieval field boundary ditches;
 - The site contains several earthworks of minor significance, and an isolated historic hedgerow;

- Historic and ongoing arable cultivation is likely to have impacted on any buried archaeological deposits to some extent;
- The proposed groundworks will impact any buried archaeological deposits that are present; and
- No adverse setting issues have been identified in relation to designated heritage assets.

- 6.61 The assessment identifies that there is no harm to any above ground heritage assets such as Listed Buildings, Conservation Areas or historic landscape features. The illustrative masterplan confirms that hedgerows on the site (also a historic feature in some instances) are capable of being incorporated into the design without significant loss or impact.
- 6.62 In considering below ground archaeology, the assessment concludes that no buried heritage assets of national significance are located within the site that may require preservation in situ. However, intrusive ground investigations will be likely, and this can be appropriately secured via condition.
- 6.63 It is considered that the development would have a neutral impact on the historic environment and is not a matter that weighs either in favour of, or against the development proposal.

Sustainable Construction

- 6.64 David Wilson Homes support the principles of low-carbon design, reducing carbon emissions and ensuring lower energy costs for customers. They follow a 'fabric first' approach to building design, maximising the performance of the components and materials of the building itself. This includes insulation, high-performing windows and doors, increased air tightness and maximising passive solar gains.
- 6.65 David Wilson Homes continue to review and apply new technologies that help deliver energy efficiency such as waste water heat recovery, improved insulation around windows and doors and energy efficient boilers. Such measures enable an EPC rating of 'B' or above when homes are constructed and make them eligible for products such as Barclays Green Home Mortgages. When customers occupy their new homes they receive a guide to its sustainability features to help safeguard the environment and reduce ongoing energy costs.
- 6.66 The details of the sustainable credentials of the built form are not known in detail at this Outline stage. However, this will likely include:
- Use of sustainable resourced materials
 - Energy efficient buildings established through the fabric of the building
 - Accessible and adaptable homes
 - Energy display devices
 - AAA rated appliances
 - Water efficient homes to manage demand

- Water butts fitted to collect rainwater for re-use

7 Statement of Community Involvement

- 7.1 The NPPF encourages stakeholder involvement and early engagement with the local community. The Arun Statement of Community Involvement (SCI) states that prior to submitting a planning application, developers are encouraged to undertake at least one of a number of forms of consultation methods identified.
- 7.2 To date, the following consultation has been undertaken:
- 2018 – presentation to Walberton Neighbourhood Plan Group
 - 2018 – individual meetings with a number of adjoining landowners
 - January 2019 – attendance and presentation of the site at Neighbourhood Plan consultation event
 - 2019 – pre-application enquiry to West Sussex County Council Highways Department
 - May 2020 – pre-application enquiry to Arun District Council
 - August – September 2020 – consultation by way of letter to adjoining landowners / residents. Circa 40 individuals contacted directly
 - September 2020 – presentation to Walberton Parish Council meeting

Comments from local residents and Parish Council

- 7.3 The consultation work to date has highlighted a number of matters, which comprise a mix of technical matters, support for bungalows on site and general requirement to understand the final design details. The comments received are summarised below:
- Concern regarding ability of Tye Lane to accommodate proposed access and increased vehicle movements;
 - Lack of capacity in local infrastructure, principally in local schools and healthcare provision;
 - Off-site surface water flooding and inundation of existing sewer systems;
 - Foul drainage capacity;
 - Loss of agricultural land;
 - Landscape buffer around the southern part of the site seen as benefit; and
 - Significant interest in the purchase of the proposed bungalows.
- 7.4 In response to the concerns raised, the detailed technical reports, such as the drainage strategy and transport assessment will address concerns on drainage and highway capacity. The scheme has also been designed to provide public access to open space, whilst also ensuring a buffer to existing residential properties and the provision of bungalows along the southern edge of the site.
- 7.5 It is noted that there is concern that local facilities and services are over capacity. In that regard, the District Council will secure costs towards improvement of infrastructure in the area, to ensure appropriate capacity is available for existing and future residents.

- 7.6 Should outline permission be granted, the applicant is committed to undertaking further consultation on the detailed layout of the site and technical design matters.

Arun District Council – Pre-application enquiry

- 7.7 The pre-application enquiry related to a proposed application of around 153 dwellings, with the response confirming the following:
- The proposal represents sustainable development and the NPPF 'presumption in favour of sustainable development' is engaged. This and the other material considerations set out above combine to outweigh the conflict with the policies of the development plan and serve to allow for the principle of the application to be supported.
 - The proposed development would go a considerable way in achieving the Council's Five Year Housing Land Supply. This would overcome the conflict with the out-of-date policies in the Development Plan.
 - Some policies of the NPPF are cast in terms which indicate that in certain circumstances planning permission should be restricted. These, in this case, relate principally to flooding, agricultural land, the natural environment and designated heritage assets. Having regard to the tests set out in the NPPF, it is considered that the circumstances are such that none of these issues amount to a reason for withholding planning permission.
 - Consideration to be given to the position of the green corridor through the site and its legibility.
 - The site is environmentally sustainable as it lies on the northern edge of Walberton and it will be possible for residents to use non-car means of transport to access the primary school, local shops and other services.
 - Matters of detail will need to be considered further.
 - Consultation with the Parish Council recommended.

West Sussex County Council Highway Department & National Highways – Pre-application enquiry

- 7.8 Pre-application advice was sought in terms of the access of the proposed access on to Tye Lane. This considered a development of circa 150 dwellings. The response highlighted the following matters:
- Confirmed that the principle of the access is achievable for around 150 homes.
 - Need to allow visibility splays to account for vehicle speeds of 40 – 41 mph.
 - Visibility splays to be provided in accordance with the Design Manual for Roads Bridges.
 - Traffic calming not recommended along Tye Lane.

- Pedestrian and cycle access via Field Close acceptable but requested details of ownership to be considered.
- General advice and guidance provided in regard to future internal layouts, parking requirements and sustainable access considerations, including the needs of mobility impaired people and those with pushchairs.
- Junction modelling recommended.
- Impact upon the A27, in particular the impact of development of Fontwell West roundabout as a result of the closure of Tye Lane, should the Grey A27 route be delivered.

7.9 The above consultation is considered to be sufficient for the scale of development and inform the concept masterplan for the site. It also confirms that both the District as the decision making authority and the County Council as the highway authority support the principle of development on the site.

8 Affordable Housing Statement

- 8.1 Policy HDM1 provides for a mix of housing to meet local needs and requires that all housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. It is important to highlight that the policy does not prescribe a specific housing mix that must be met by individual applications, with the policy stating that each must be considered on its own merits.
- 8.2 The policy (12.2.4) continues to acknowledge that the final mix will be then be negotiated on a site-by-site basis, having regard to the most up-to-date SHMA. Policy HP9 (Housing Mix) of the Walberton NP seeks to ensure that "proposals providing a range of house types and tenures appropriate to the site size will be supported".
- 8.3 The Local Plan expects the delivery of circa 5,000 affordable homes across the plan period, which equates to the provision of 238 affordable dwellings per annum. It expects at least 1,000 of these to be delivered by way of a Neighbourhood Plan.
- 8.4 The detailed layout and housing mix of the proposed development off Tye Lane is yet to be determined, however, it is proposed that 30% of the units, which equates to up to 39 homes, will be provided as affordable dwellings. These would comprise a tenure mix of rented and shared ownership properties, expected to be split 75% in favour of affordable rented properties and 25% as shared ownership properties.
- 8.5 It is expected that the mix will be provided in accordance with the recommendations set out in the 'Updated Housing Needs Evidence' or following agreement on appropriate mix with the Council's Housing Enabling Officer and the Council's preferred affordable housing providers.
- 8.6 The appropriate mix can be secured by planning condition and delivered by way of legal agreement. The provision of 39 affordable homes, at a time where there is significant housing need in the District, is a matter that weighs heavily in favour of approving the development.

9 Planning Conditions, Infrastructure and Draft Heads of Terms

- 9.1 The Council has now adopted its CIL Charging Schedule and therefore any off-site impacts, due to the scale of the development, are expected to be addressed by this. This would be with the exception of a proposed pedestrian crossing on The Street.
- 9.2 As the proposal comprises an outline scheme, with all matters reserved, other than means of access, a number of conditions will be likely to secure the relevant detail and parameters for the Reserved Matters.
- 9.3 As noted above, off-site highway works are proposed with the introduction of a crossing facility on The Street, east of the Tye Lane junction. This can be secured by condition as all works would take place within the highway boundary.
- 9.4 In light of the above, the Heads of Terms of any future legal agreement are likely to be confined to the following:
- Delivery of the affordable homes,
 - Management and maintenance of public open space, play facilities and SuDS.
- 9.5 In terms of utilities, these are defined in the Development Plan as gas supply, electricity supply, heat supply, water supply, waste water treatment, telecommunications infrastructure. Connectivity to existing utilities connections can be achieved and the applicant will work closely with the utility providers to ensure appropriate provision on-site.
- 9.6 The following financial benefits will also result from the development:
- i. CIL receipts in the region of £1.5 million
 - ii. Council Tax payments (tbc based on final mix)
 - iii. New Homes Bonus
- 9.7 In accordance with S70(2) (b) of the Town and Country Planning Act 1990 (as amended), weight should be afforded to the above, so long as the secure benefits / mitigation associated with the proposed development. This is a matter for the Council to weigh in determining this application and the allocation of funds secured from, and, as a result of the development.
- 9.8 Subject to appropriate conditions and agreements suggested above, it is considered that the proposal would comply with Policy ICS1 of the LPP1.

10 Conclusion

- 10.1 This statement has been prepared in support of this Outline planning application for the construction of up to 131 dwellings on land west of Tye Lane, Walberton. 30% of the homes are to be provided as affordable dwellings. The application follows a refused planning application for up to 155 dwellings, which is currently at appeal. The scheme has been revised, with a reduction of dwelling and provision of additional information to address the Council's previous reasons for refusal.
- 10.2 This outline planning application seeks to establish the principle of residential development, and as set out in this statement, it can be demonstrated that the site is suitable to accommodate the proposed number of dwellings. The site is located outside the defined settlement boundary but is enclosed by the defined settlement boundary to the south, east and west.
- 10.3 It is considered that all development policies that relate to the supply of housing in the Arun Local Plan 2011-2031 and Walberton Neighbourhood Plan have significantly reduced weight because Arun District Council are unable to demonstrate an adequate supply of housing land. This is acknowledged by the Council during pre-application discussion, its decisions on recent applications and the appeal decisions.
- 10.4 In such situations, the NPPF directs decision-makers to grant permission, unless either:
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*
- 10.5 As neither of the above are considered to apply in this instance, we believe the presumption in favour of sustainable development is engaged. This position was confirmed during pre-application discussions with Arun District Council and in the refusal of application WA/68/20/OUT.
- 10.6 In terms of the recently Made Neighbourhood Plan, advice contained at paragraph 14 of the NPPF must be considered. The applicant believes that the housing numbers identified in the Neighbourhood Plan have not been justified or subjected to any significant examination as part of the Neighbourhood Plan review process. The applicant is also of the view that the housing land supply position is significantly below a 3 year supply, as set out in appended Housing Land Supply Assessment. The result of the above means that criteria b) and c) of paragraph 14 are not met and the provisions of paragraph 14 do not apply.
- 10.7 The proposal represents sustainable development, which together with other material considerations, such as the significant benefit that should be afforded to housing delivery and its associated economic and social benefits, outweigh the conflict with the policies of the development plan and serve to allow for the principle of the application to be supported.

- 10.8 The provision of 131 dwellings would make a significant contribution to housing delivery within the District and is a matter that carries significant weight in favour of approving the development. Additionally, there are economic and environmental benefits including the creation of jobs during construction.
- 10.9 The site is environmentally sustainable as it lies on the northern edge of Walberton and it will be possible for residents to use non-car means of transport to access the primary school, local shops and other services. This is supported by the conclusions of this statement and that of the associated supporting technical assessments. This is also confirmed by the District Council in its response to a pre-application enquiry in May 2020 and in approving the Linden development site east of Tye Lane. The Council's recently updated HELAA also confirms the suitability of the site and its housing delivery Action Plan invites applications on sites such as this.
- 10.10 The application is supported by a Transport Assessment that concludes that Tye Lane is suitable to provide the proposed means of access to the site for vehicles. Pedestrian and cycle access is also provided independently to this and a choice means of transport is achievable. The Transport Assessment considers the impact of the development on the wider highway network and concludes that the development would not have a severe impact on highway safety. Severe impact being the test set out with the National Planning Policy Framework, when considering highway impacts of proposed new development.
- 10.11 The development of the site is capable of producing a net gain of biodiversity across the site, together with access to over 3 hectares of additional public open space for existing and future residents.
- 10.12 The proposed development comprises an Outline application, but the illustrative plans submitted in support of the application demonstrate that the site can be developed without harm to the landscape setting and locality. Any effects on landscape character are confined to the application site only.
- 10.13 The illustrative material demonstrates that the design will be of a high quality and the density and scale of the proposal is commensurate with surrounding development and therefore appropriate for the location. The illustrative layout includes the provision of extensive areas of open space and a green corridor through the site.
- 10.14 As set out above, the tilted balance is engaged by paragraph 11d of the NPPF and there are no clear reasons within the NPPF to refuse the application. All technical matters, including ecology, highways, landscape impact, trees and flood risks are acceptable.
- 10.15 The proposal jointly addresses each strand of sustainable development to provide and widen the choice of high-quality homes within a sustainable location. The scheme, as demonstrated, is compliant with national and local planning policy and it is therefore requested that planning permission is granted.

HA - Appendix 1: Housing Land Supply Assessment submitted in support of recent appeal

Hearing Statement – Housing Land Supply Matters on behalf of the Appellant

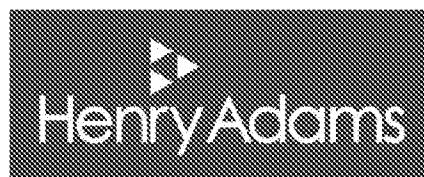
Site: Land west of Tye Lane, Walberton

Planning Appeal Reference: APP/C3810/W/21/3278130

LPA Planning Reference: WA/68/20/OUT

Appellant: David Wilson Homes

August 2021



Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA

Town Planning ► Development Consultancy



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Executive Summary

This Housing Land Supply Hearing Statement considers whether Arun District Council is able to demonstrate a 5-year supply of deliverable housing sites in accordance with the requirements of the National Planning Policy Framework 2021 (NPPF) and in particular Paragraph 74. Annex 2 of the NPPF sets out the definition of what constitutes a deliverable site for the purposes of Paragraph 74.

The Council has published its updated housing land supply position, which is set out in its Annual Monitoring Report published December 2020 and uses a base date of 01 April 2020. This assessment is therefore nearly 16 months old at the time of preparing this Hearing Statement.

The Appellant has prepared an assessment of the Council's latest position set out in the 2020 AMR so that the Inspector can review both parties' positions on housing land supply based on the same information relating to the current monitoring period 01 April 2020 – 31 March 2025.

This Hearing Statement considers the relevant policy context and other key material considerations such as National Policy and Guidance, relevant Appeal Decisions and Case Law and demonstrates the following:

- From 1 January 2021 there has been a step change in the figure applicable to the 5-year housing land supply calculation, which comprises the Council's highest housing requirement it has ever had, given the trajectory for housing delivery expected in the current Arun District Local Plan 2018.
- The Council's assessment of supply does not meet with the requirements of the Annex 2 test (even when the recent interpretations of Annex 2 is taken into account);
- As a consequence the level of supply identified by the Council should be reduced;
- The Appellant's formal position is that the Council cannot demonstrate a 5-year housing land supply
- In light of the above, Paragraph 11(d) of the Framework 2019 is engaged in the determination of this Appeal and the required 'tilted balance' applied;
- The appellant's position is also that the housing land supply is well below 3 years supply, meaning that all the tests contained at paragraph 14 of the NPPF are not met. The result of this is that any conflict with the Walberton Neighbourhood Plan would not immediately outweigh the benefits of the proposed scheme.
- The underlying point here is the need to significantly boost the supply of housing nationally, which is an objective the Government takes very seriously and has sought to address through fundamental changes to the planning system to ensure that much needed homes are provided in the areas where the community needs them the most. This Appeal proposal seeks to assist in meeting that need; and,
- It is a requirement of Government that the Council seeks to remedy its housing land supply shortfall. In circumstances where the adopted Arun Local Plan has failed to deliver sufficient homes the Council needs to take a positive and proactive approach to the release of suitable and sustainable greenfield sites such as this Appeal site.

1. **Introduction and Background**

- 1.1. I am a Partner and Head of Planning at Henry Adams LLP, a firm of Chartered Town Planners, Chartered Surveyors and Estate agents. I have an MSc in Town Planning and I am chartered member of the Royal Town Planning institute.
- 1.2. Henry Adams LLP offer a range of planning consultancy services to a wide range of clients, predominantly within Sussex, Hampshire and Surrey. Our main focus is in relation to residential development. Beyond planning consultancy services, Henry Adams provides development consultancy to a wide range of land owners. This advice comprises advice on the promotion of land through to securing planning permission, the delivery and sale of development sites to housebuilders.
- 1.3. Henry Adams LLP are actively involved in Arun District, either through the planning process, or through Development consultancy and land sale advice in the majority of the strategic housing allocations in the Local Plan as well as a high proportion of those sites promoted in the most recently published Housing Economic Land Availability Assessment (HELAA). We have an in-depth understanding of the lead in timings to secure planning permission, associated land sales of development sites and subsequent delivery rates once development commences. The latter is informed by evidence made available by Henry Adams LLP New Homes team.
- 1.4. Prior to joining Henry Adams, I worked in senior roles in Local Planning Authorities for over 10 years, including roles at Arun District Council and Waverley Borough Council. At both authorities, I represented the Council at a number of Planning Hearings and Inquiries, appearing as an expert witness on behalf of the Council.
- 1.5. This Appeal -Statement relates to an appeal by David Wilson Homes against the decision of Arun District Council to refuse it's application for development, which is described by the Council (additional bold text added to description by Arun District Council at validation stage) as follows:

Outline application with all matters reserved, other than means of access, for the construction of up to 155 No. dwellings (30% affordable homes) & amendment to boundary of garden land to serve adjoining property. This application affects the character & appearance of the Walberton Village Conservation Area, may affect the setting of listed buildings & is a Departure from the Development Plan.

- 1.6. I have been involved in the promotion of this site following instructions received from the landowner to promote the land for development purposes, following a call for sites exercise by Arun District in early 2018. Since then, I have been engaged in the promotion of the site for development purposes and the preparation and submission of the above referenced planning application. Accordingly, I have visited the site and surrounding area numerous times and have an in depth understanding of the site and surroundings.
- 1.7. The application was refused under delegated powers on the 12 January 2021 for 8 reasons. The decision notice is provided elsewhere in the submission.

- 1.8. This Hearing Statement seeks to deal with the housing land supply matters that arise in relation to this case flowing from the Appellant's Statement of Case and informed by the Case Officer's delegated report on the appealed application.
- 1.9. In addition to this Statement and my separate evidence on Planning Matters, the following members of the Appellant's professional project team have also prepared separate submissions for consideration:

Subject	Consultant
Transport	Mark Smith – Paul Basham Associates
Heritage	Richard James - Archaeology South East
Drainage / Flood Risk	Stuart McGowan – CEP
Ecology	Kate Lewis – Ecology Co-op
Minerals Resource	Stephen Barry – Wardell Armstrong
Agricultural Land Quality	Simon Lush – Henry Adams LLP

- 1.10. In addition to the above, the appellant will seek to secure a Statements of Common Ground on housing land supply matters.

2. Legislative Background and Planning Policy Framework

- 2.1. One of the overarching policy objective set down by Government is for the planning system in England to significantly boost the supply of new housing through sustainable patterns of development.
- 2.2. In order to achieve this, one of the key national policy tools employed by Government is the requirement placed on all Local Planning Authorities to 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.
- 2.3. The NPPF also requires the supply of specific deliverable sites to include an additional Buffer.
- 2.4. The Buffer is to be calculated by reference to the Housing Delivery Test ("HDT") measurement undertaken annually by Government and, depending on the applicability of the specific circumstances set out in Paragraph 74 a), b) and, c) will comprise either 5%, 10% or 20%.
- 2.5. Annex 2 to the NPPF provides the definition of what constitutes a deliverable site for the purposes of housing land supply assessments, namely:

Deliverable: 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 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.*

- 2.6. It is important to note that the Annex 2 definition is not exhaustive and the type of sites capable of falling either within category a) or b) can be broader than the particular examples given i.e. the lists are not 'closed'. A recent Consent Order (see **Appendix 1**) confirms that this is the Secretary of State's understanding of the definition in the Annex.
- 2.7. It is, however, important to highlight that there is a material difference between the two categories of site identified in the Annex insofar as the level of evidence is concerned.
- 2.8. Any site that fits the definition of category a) is considered deliverable unless and until 'clear evidence' to the contrary is presented by those wishing to challenge the 5- year housing land supply position. Equally if an LPA is seeking to include a site that is not specifically identified in the category a) definition it must also follow that the LPA must demonstrate through evidence that the site is appropriately a category a) site.
- 2.9. In the context of category b), the definition of can only be considered deliverable where there is 'clear evidence' that it will provide completions in the 5- year period. Those wishing to challenge the deliverability of sites in category b) merely need to demonstrate that 'clear evidence' has not been provided by the LPA to support the inclusion of the site (the Inspector in the Longdene House case confirmed this approach at Paragraph 39, See **Appendix 2**).

National Planning Practice Guidance

- 2.10. To establish what may constitute 'clear evidence', the National Planning Practice Guidance ("PPG") provides further guidance. The PPG advises that such further evidence to demonstrate the deliverability of Category b) sites may include:
 - *Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
 - *Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
 - *Firm progress with site assessment work; or*

- *Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

- 2.12 The PPG only provides examples of further evidence. It therefore follows that other evidence may be sufficient. It equally follows that evidence provided by an LPA that appears to fit the examples may be insufficient. The key test is whether the evidence presented in support of any given site is sufficient to clearly demonstrate that it is 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. If there is any doubt then a Category b) site should be removed from the 5-year housing land supply.
- 2.13 In terms of Neighbourhood Plans, paragraph 14 of the NPPF states that in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided **all** of the following apply:
- a) The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
 - b) The neighbourhood plan contains policies and allocations to meet its identified housing requirement;
 - c) The local planning authority has at least a three-year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
 - d) The local planning authority's housing delivery was at least 45% of that required over the previous three years.

3. Relevant Five Year Period & Housing Requirement

Five year period

- 3.1 The Council's current assessment of 5-year housing land supply is set out in its Annual Monitoring Report ("AMR") dated December 2020 and has a base date of 01 April 2020. This represents the most up-to-date assessment undertaken by the Council.
- 3.2 It is considered that the correct five year period for present purposes is to be 01 April 2021 – 31 March 2026.

Local Plan Requirement

- 3.3 Paragraph 0058 of the Housing Supply and Delivery section of the PPG is clear that the requirement should be calculated using the Local Plan where this was adopted in the last 5 years. Given that the Local Plan was adopted in 2018, we remain within that 5 year period and the housing supply should be calculated on the basis of the requirements of the Local Plan.

- 3.4 On the basis of the Local Plan being adopted in the last 5 years, the starting point for the calculation of 5-year supply is 1,310 dwellings per annum¹. This equates to a requirement for 6,550 homes to be delivered over the next 5 year period highlighted above, excluding any unmet need or buffer resulting from the Housing Delivery Test. This is not considered to be contentious and it is hoped to be a matter of common ground between the Appellant and the Council.
- 3.5 On the basis of the above, the Council's housing requirement for the 5 year period comprise:
- i. Local Plan annual requirement
 - ii. Shortfall over the past plan period (2011-2021)
 - iii. Appropriate Buffer (applied to annual requirement and shortfall figure)

Previous Under delivery

- 3.6 Paragraph 031 of the PPG states that the level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied.
- 3.7 The Council's December 2020 AMR, confirmed that the shortfall in housing delivery to the base date was 2,039. This was on the basis of the available up until April 2020. In January 2021, the 2020 HDT figure was published. On the basis of the AMR having a April 2020 base date, it is not considered that this shortfall has been accounted for.
- 3.8 This under supply should be added to the shortfall. The Council had a requirement of 1,120 homes to be delivered in 2020, however, they only delivered 515 homes in that year, resulting in a shortfall in delivery of 605 homes in 2019/2020. As a result, the shortfall for the purposes of the housing land supply assessment should be 2,650 homes.

Buffer

- 3.9 The Buffer is calculated by reference to the most recent HDT measurement published by Government, which in this case is the 2020 HDT published in January 2021. Where the HDT measurement is less than 75%, a 20% Buffer should be added to the housing requirement figure to ensure choice and competition in the market for land.
- 3.10 The results of HDT measurement for Arun, since 2019 are produced below:

Year	Arun DC's HDT Result
2018	91%
2019	68%
2020	61%

¹ Local Plan 2018 – Policy H SP1 – Table 12.2

- 3.11 On the basis of the above, the buffer applied should be 20%.

Housing Requirement for the five year period 2021-2026

- 3.12 In applying the three elements to the housing requirements for the five year period, 2021 – 2026, the housing requirement for the District is set out below:

	Element of Supply	ADC – AMR position	Henry Adams
1.	Local Plan Trajectory requirement	6,360	6,550*
2.	Shortfall over past plan period – 2011 – 2020**	2,039	2,650 (including 2020 shortfall)
Total			9,200
3.	Buffer (20%)	1,680	1,840
	Total Requirement 2021-2026*	10,269	11,040
4.	Annual Requirement (1 + 2 + 3 / 5)	2,054	2,208
5.	Deliverable supply	6,599	4,421
6.	5 year Housing Land Supply	3.3 years**	2 years

**updated to reflect requirement for 2021 – 2026 Local Plan Trajectory period (1,310 dpa)*

***in undertaking a calculation of the Council's figures in the December 2020 AMR, the Council's Housing Land Supply position calculates at 3.21 years (6,599 / 2,054 = 3.21)*

4. Analysis of Council's Supply History & Shortfall

- 4.1 Prior to a consideration of the Council's sources of supply, it is important to quantify the extent of shortfall resulting from the Council's performance on housing delivery. A summary of the housing shortfall against both the Council's position and the position set out in this statement is as follows:

	ADC – AMR Position December 2020	Henry Adams LLP
Housing requirement resulting from under supply	3,670*	6,619**

**10,269 - 6599 = 3,670*

***11,040 - 4,421 = 6,619*

- 4.2 The quantum of dwellings highlighted as under supply in the table above result from the following calculation:

Total Requirement – Deliverable Supply = housing requirement result from shortfall.

- 4.3 The purpose of the above table is to highlight the significant extent of the shortfall, given the overall housing requirement and need in the District. Accordingly, whilst the determination of this appeal will be guided by the advice contained in the NPPF, in particular paragraphs 11 and 14, substantial weight must be given to the sheer quantum of shortfall in housing delivery, which in the worst case comprises a third of the housing requirement across the total plan period, 2011-2031.

5. Assessment of Council's Sources of Supply

- 5.1 This section of the Statement reviews the Council's sources of supply for the 5-year period April 2021 – 31 March 2026 as set out in the December 2020 AMR.
- 5.2 The Council seeks to rely on the following categories of supply for the 5-year period:
- Large sites with planning permission
 - Small sites with planning permission
 - Windfall sites
 - Strategic Allocation Sites without Planning Permission
 - Deliverable Housing & Economic Land Availability Assessment (HELAA) sites
 - Made Neighbourhood Plan Sites
- 5.3 As set out in Section 2 above the definition of deliverable sites set out in Annex 2 divides sources of supply into two categories (Category a) and Category b)).

Category a) Sites

- 5.4 For the purposes of establishing those sites falling within Category a), the Council's assessment defines large sites as those delivering 5 or more dwellings, as this is based upon West Sussex County Council's, rather than the definition of major sites. As a result, some of the supply included in the category of committed large sites (5 dwellings +) comprises minor development as defined in the NPPF. The NPPF defines category a) sites as follows:

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).

- 5.5 For the purposes of this assessment, I have reviewed all of the sites included within the Council's sources of supply. It should be noted that the Council's supply relies upon a number of large sites, but for the purposes of category a), the Council do not clearly define between large sites with outline permission, and large sites with detailed permission.

Category b) Sites

- 5.6 The remainder of the Council's sources of supply therefore fall within Category b). The NPPF defines category a) sites as follows:

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.

- 5.7 Windfall sites should also comprise category b) as they should be subject to the more onerous test set out in Paragraph 70 of the Framework 2019.
- 5.8 The Council's AMR December 2020 splits their housing delivery sites as follows:
- Large site Commitments (With Planning permission at 31st March 2020)
 - Strategic Allocation sites (without planning permission) from the HELAA included in the 5 year supply/Trajectory
 - Deliverable HELAA sites included in the 5 year Supply/Local Plan Trajectory
 - Neighbourhood Plan Sites included in 5 year HLS/Trajectory
 - Small site Projected Completions Losses and windfall calculation
 - Small site commitments as at 31st March 2020
- 5.9 Having reviewed each of the sources of supply, listed at Appendix 3 -7 in the Councils December 2020 AMR, it is considered that the Council seek to rely on a significant number of sites that only have outline permission, an allocation or sites which have been rated positively in a recent HELAA update. Where these have been included, no clear evidence has been provided to demonstrate that they are deliverable in the next 5 year period.
- 5.10 Accordingly, the majority of supply relies on category b) sites and at the time of preparing this Statement, no clear evidence in support of these sites inclusion has been provided. The assessment must therefore be made on this basis.

Large site commitments (with planning permission at 31st March 2020)

- 5.11 In considering those sites comprising 'Large Site Commitments', **Appendix 3** sets out those sites which we believe should be removed from the Council's housing land supply position as they do not benefit from detailed planning permission and the Council have not provided any evidence, and therefore clear evidence, for their inclusion within the housing supply over the course of the next 5 years.
- 5.12 As a result of the sites removed, it is our view that 836 dwellings should be removed from this element of the supply.

Strategic Allocation sites (without planning permission) from the HELAA

- 5.13 In considering the identified supply of sites that comprise strategic allocations in the Local Plan, it is our position that 1,219 homes be removed. All those proposed for removal do not benefit from planning permission, nor is there any reasonable prospect of these sites being delivered in the next 5 year period. The reasons for the sites removal are set out within **Appendix 4**.
- 5.14 Within this element of the Council's supply, they seek to rely on delivery of homes in the next 5 years from a number of strategic site allocations in the Local Plan 2018. This includes delivery from the following strategic allocations:
- Barnham/Eastergate/Westergate (BEW) (Policy SD5) = allocation for at least 3,000 home allocation and 611 homes are shown to be delivered in the Councils HLSA.

- Angmering South and East (Policy SD11) = 250 home allocation and 60 are shown to be delivered in the Councils HLSA.
- Ford (Policy SD8) – 1,500 home allocation and 150 homes are shown to be delivered in the Councils HLSA.

5.15 As a starting point, at the time of writing, none of the above sites benefit from any form of planning permission. The allocations at Ford and BEW rely on the endorsement of Masterplans prior to the determination of planning applications. Both sites are also subject to complex land ownership issues, meaning they are at differing stages of preparation and deliverability is not currently clear.

BEW

5.16 In first considering housing delivery at BEW, it is important to note that this is a complex strategic allocation. The allocation has the benefit of an endorsed Masterplan. However, the Masterplan focuses on general design principles and land uses. It does not go as far to demonstrate key pieces of infrastructure to support the development and as required by requirements of the allocation policy. Principally, this relates to the delivery of a realignment to the A29, which is key part of highway network connecting Bognor Regis and surrounding villages with the A27.

5.17 The intention of the allocation is to realign the A29 through this development, including bridging the mainline railway line, to relieve congestion and safety concerns on the current A29, which at a number of junctions operates over capacity.

5.18 At present, the final costs of delivery the realignment and other key pieces of infrastructure are yet to be finalised. The Council are currently relying on costings within the Infrastructure Delivery Plan (2017), which was prepared in support of the Local Plan. These comprise high level costings and are not considered to be accurate or up to date.

5.19 Agreement of all costings will also be subject to consultation with the various landowners / promoters involved in the overall allocation. This includes a large number of landowners, varying from public bodies, housebuilders, private landowners and land promoters.

5.20 At present, none of the sites within the allocation benefit from planning permission, with a number of sites previously refused by the Council.

5.21 In terms of our understanding of the site delivery, Henry Adams LLP act for 2 of the housebuilders promoting land within the allocation from a planning perspective and also act as land agent for the majority of the landowners making up the part for the site referred to in Arun's HLSA as 'Fordingbridge', which is expected to delivery 150 homes (from a likely total of 530 homes) in the 5 year period.

5.22 Given the varying stages and types of landowners making up the allocation, absence of planning permission for any part of the site and on-going discussions on infrastructure delivery and costs, this site cannot be considered as a reasonable element of the Council's housing land supply.

Ford

- 5.23 As with the BEW scheme, the allocation is a complex strategic housing allocation, originally promoted as an eco-town in the 00's, which wasn't successfully achieved. The allocation site is subject to a live outline planning application², which was submitted in March 2020 and remains to be determined by the Council.
- 5.24 As noted above, the Local Plan requires a Masterplan to be endorsed on a number of the Council's strategic housing allocations. Whilst the design elements of the Masterplan have largely been endorsed by the Council, the committee endorsement was subject to a number of conditions being met. Approval of this detail has been deferred to Council's Head of Planning and requires the following:
- "That authority be delegated to the Director of Place to endorse 'The Landings' Masterplan Document following:*
- A. The receipt of an amended document that satisfactorily demonstrates:*
- 1. Improved provision for pedestrians, cyclists and equestrians, and*
- 2. The historic alignment of the canal; and*
- B. Confirmation that there is agreement between a recognised education provider and the landowners regarding the transfer of land for the delivery of a new secondary school at Yapton/Ford."*
- 5.25 The requirements of point A have been met, however, there is no agreement on the release of adjacent land for the delivery of a secondary school. This requires an agreement with that landowner and likely West Sussex County Council as education provider. Progress has not been made on land value and subsequently an agreement has not been made between the parties. This land falls beyond the allocation boundary and outside the redline area of the live application with the Council for 1,500 homes.
- 5.26 The application site also borders a site allocated in the County Council Waste Local Plan for transfer, recycling and recovery of waste. The site, referred to as Site north of Wastewater Treatment Works, Ford, is subject to a live planning application for a new waste treatment and energy recovery scheme³. This includes a building of a significant scale, including 2 x 80 metre high chimneys. These would be located within 200m of the proposed allocation and whilst yet to be determined, will be a material consideration on the deliverability of the wider housing allocation at Ford.
- 5.27 In terms of predicted trajectory for housing delivery, the District's HLSA envisages the delivery of 150 at Ford in the next 5 years. Having discussed this with Barton Wilmore, planning agent on behalf of the site Promoters, this is not considered to be achievable at the present. An email from Robin Shepherd of Barton Wilmore (included at **Appendix 5**) confirms that he has previously advised Arun that the site could deliver housing in the next 5 year period. However, that was prior to the submission of his current, live planning application, which was submitted circa 16 months ago and the absence of the conditional

² LPA application reference F/4/20/OUT

³ LPA application ref: WSCC/ 011/21. Application description - Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding, and landscape works

requirement of the endorsed masterplan, requirement agreement on third party land to deliver a secondary school.

- 5.28 Given the uncertainty around adjoining land uses, absence of an outline planning and requirement to sell the land to a housebuilder, this site cannot therefore be considered a reasonable element of the Council's housing land supply.

Worthing Rugby Club

- 5.29 The land at Worthing Rugby Club is subject to an allocation of circa 250 homes, which requires relocation of a large and established Rugby Club to another. This contains a larger club house facility, carp parking, children's nursery, gymnasium and 6 full size pitches and additional grassed training areas. The club is also a member owned club and will require agreement from a majority of members, prior to any agreement to relocate being formally agreed with a third party.
- 5.30 At the time of writing, the rugby club do not have any agreement in principle with its members to commit to relocating the rugby club site. This would require agreement to purchase alternate land from a third party landowner and the new ground would need to be functional prior to vacating the current site, in the interests of maintaining a functioning rugby club. This site cannot therefore be considered a reasonable element of the Council's housing land supply.
- 5.31 In terms of our understanding of the site delivery, this is my view based on being a long standing member of the rugby club to whom I provide on-going planning advice to the club's Development Committee.

'Deliverable' HELAA sites

- 5.32 The Council also rely on a number of HELAA sites to support the housing delivery over the next 5 years. These are not considered to comprise windfall sites and do not meet the exceptions for sites to be included in the Council HLSA, when considering the definition in Annex 2 of the NPPF regarding deliverable sites. For completeness, the Council's HELAA has three categories of sites, which comprise:
- Deliverable – sites that are suitable, available and achievable to be deliverable
 - Developable - suitable, available and achievable sites, but specific information suggests that development could not come forward within 5 years
 - Not-currently developable - not currently developable where the prospect of development is unlikely as it does not meet all three criteria of being suitable, available and achievable
- 5.33 Of those sites highlighted, it is our view that 261 dwellings should be removed from this source. A summary of the sites to be removed and their reasons for removal are set out at **Appendix 6.**

Summary of removed sites

- 5.34 Following a detailed review of deliverable sites, it is our position that 2,178 dwellings should be removed from the Council's deliverable supply figures. The Housing Land Supply Assessment (HLSA) contained within its 2020 Annual Monitoring Report (AMR) falls to be tested against the definition of "deliverable" under the NPPF which requires, in relation to outline permissions and allocations, LPAs to provide "clear evidence" that housing completions will begin within 5 years (no clear evidence is provided within the Council's AMR published in December 2020 or elsewhere from review of available documents)
- 5.35 The Council's HLSA relies on a significant number of sites coming forward that are neither allocated, have permission, nor located within the built-up area boundary. The PPG wording confirms that "clear evidence" requires specificity, transparency and detail. It is unquestionably meant to be a rigorous exercise capable of withstanding scrutiny.
- 5.36 As a result of the above evidence the Council's 5-year housing land supply should be reduced by a total of -2,178 dwellings as set out in the summary table below:

	Arun position	Henry Adams position	Difference
Large Site Commitments (AMR Appendix 3)	4,145	3,309	836
Small Site Commitments	280	280	0
Windfall allowance	156	156	0
Made Neighbourhood Plan Allocations	257	257	0
Deliverable HELAA Sites within built up area	178	55	123
Strategic Site Allocations	1,583	364	1,219
Total Supply	6,599	4,421	2,178
Supply in years	3.3	2	1.3

- 5.37 The effect of the above is summarised below and considered as part of the Planning Balance in my appeal statement on Planning Matters.

6. Summary of Henry Adams Assessment of Council's five year supply position

- 6.1 This statement has examined key areas of the Council's five year housing land supply position, as set out in its December 2020 AMR. It is accepted that there are a number of changes to consider in light of the date of this report, most notably the 5 year assessment period should now be 1 April 2021 – 31 March 2026 and the previous year's shortfall in housing requirement added to the overall requirement.

- 6.2 Our position is that the Council has sought to rely on sites within their housing land supply, which either do not meet the definition of Deliverable sites, when considering the definition at Annex 2 of the NPPF, or they are not supported by 'clear evidence' to demonstrate that they are deliverable within the 5 year period.
- 6.3 A comparison document of the Council's supply and Henry Adams position is included at **Appendix 7**. This provides a comparison of the housing trajectory for the 5 year period and for assistance shows where the Council believe they are and where the differences in area for each of the parties' position.
- 6.4 In light of the above, it is Henry Adams' view that the Council's housing land supply position amounts to a 2 year supply and the housing delivery continues to show a worsening in the Council's housing supply, year on year. These factors reinforce the acute need for early housing delivery in suitable and sustainable locations. The Council have confirmed that the site is suitable for development and sustainably located and can be bought forward in the next 5 year period.

HLS Appendix 1: Thrapston - Consernt Order

IN THE HIGH COURT OF JUSTICE

Claim No. CO/917/2020

QUEEN'S BENCH DIVISION

PLANNING COURT

B E T W E E N

EAST NORTHAMPTONSHIRE COUNCIL

Claimant

-and-

SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT

Defendant

- and -

LOURETT DEVELOPMENTS LTD

Interested Party



=====

CONSENT ORDER

=====

UPON the parties agreeing to the terms hereof

BY CONSENT IT IS ORDERED THAT:

1. Permission is granted and the decisions of the Defendant, dated 24 January 2020 and carrying reference number APP/G2815/W/193232099, to allow the Interested Party's appeal under s.78

of the Town and Country Planning Act 1990, and to make a partial award of costs in favour of the Interested Party, are quashed pursuant to s.288 of the same Act.

2. The appeal is remitted to be determined de novo.
3. The Defendant pay the Claimant's costs in the amount of £8616.66

Dated: This 7th Day of May 2020

PARTICULARS

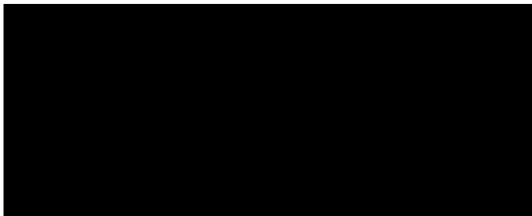
- A. These proceedings concern an application brought under section 288 of the 1990 Act by the Claimant against (1) the decision of the Defendant to allow the Interested Party's appeal against the decision of the Claimant to refuse planning permission for residential development at land to the west of numbers 7-12 The Willows, Thrapston, NN14 4LY and (2) the decision to make a partial award of costs against the Claimant in respect of that appeal.
- B. The Defendant has carefully considered the Inspector's decision and the Claimant's Statement of Facts and Grounds and Reply, and the evidence served in support. He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework ("NPPF") as a 'closed list'. It is not. The proper interpretation of the definition is that any site which can be shown to 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' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.
- C. The Defendant therefore considers that it is appropriate for the Court to make an Order quashing the decisions and remitting the appeal to be determined de novo.
- D. The Interested Party agrees that the decisions should be quashed and the appeal remitted to be determined de novo.



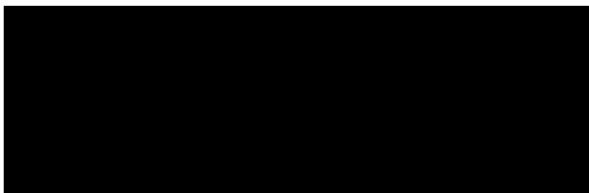
Head of Planning Services

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HLS Appendix 2: Longdene House appeal decision

Appeal Decision

Inquiry Held on 9-12 October and 19 November 2018

Site visit made on 19 November 2018

by John Woolcock BNatRes(Hons) MURP DipLaw MRTPI

an Inspector appointed by the Secretary of State for Housing Communities and Local Government

Decision date: 10th January 2019

Appeal Ref: APP/R3650/W/16/3165974

Longdene House, Hedgehog Lane, Haslemere GU27 2PH

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline and full planning permission.
 - The appeal is made by Monkhill Ltd against the decision of Waverley Borough Council.
 - The application Ref. WA/2016/1226, dated 6 May 2016, was refused by notice dated 20 September 2016.
 - The application is for "...redevelopment to provide up to 29 dwellings (net increase of 27 dwellings); demolition of 2 existing semi-detached dwellings, glasshouses and outbuildings; landscaping and highway works including alterations and extension to the existing access to Hedgehog Lane. Within this hybrid planning application: Outline planning permission (with Layout, Scale and Appearance reserved and Access and Landscaping for approval) is sought for the erection of up to 28 new dwellings (Class C3), including extension and alterations to existing access from Hedgehog Lane, demolition of 2 existing semi-detached dwellings, glasshouses and outbuildings; and associated landscaping; and Full planning permission is sought for the change of use and refurbishment of Longdene House from office (Class B1a) to residential (Class C3) to provide a new dwelling."
 - This decision supersedes that issued on 4 September 2017. That decision on the appeal was quashed by order of the High Court.
-

Decision

1. The appeal is dismissed.

Preliminary matters

2. All the appeal documentation from the quashed decision was submitted as part of the documentation for my Inquiry. I have taken into account the submissions and judgments about the relevance of the previous Inspector's decision. The appellant's view is that it should be the starting point for the assessment of any supplementary evidence. However, there is case law that the quashed decision should be treated as if it has not been made and is incapable of ever having had any legal effect. I have, therefore, considered the matter afresh and determined the appeal on its merits, having regard to the evidence submitted to my Inquiry. Nevertheless, where the unchallenged reasoned conclusions of the previous Inspector's decision are capable of being material considerations, by reason of the way the witnesses at my Inquiry were questioned about these matters, or otherwise, and I have come to a different view from the previous Inspector on those points, I have set out my reasoning for doing so.

3. The appeal site comprises Longdene House, a Victorian dwelling currently in use as offices, its gardens and adjoining fields. Access is via a private driveway off Hedgehog Lane, along a tree-lined avenue. The hybrid planning application concerns four areas of the appeal site. Area A lies to the north of the driveway. It is an open field, except for a small wooden storage building, and is currently used to graze horses. Outline planning permission is sought for 25 dwellings on Area A. Outline permission is also sought for the replacement of a pair of semi-detached cottages in Area B with two dwellings. Longdene House itself is Area C, where full planning permission is sought for a change of use from office to a single dwelling with a detached garage. Area D includes existing glasshouses and outline permission is sought for the erection of one dwelling. The submitted plans show the other fields within the appeal site as undeveloped.¹
4. The northern boundary of Area A adjoins a field which is proposed to be woodland planting as part of a scheme for 135 dwellings on Sturt Farm.² Beyond this field Footpath 35 runs between Hedgehog Lane and the A287. The majority of Area A and all parts of Areas B, C and D lie within the Surrey Hills Area of Outstanding Natural Beauty (AONB). The remaining part of Area A is designated as part of an Area of Great Landscape Value (AGLV). The town centre of Haslemere lies some 1.3 km from the site, and Haslemere railway station is about 800 m away.
5. Part of the appeal application is in outline, but with access and landscaping to be determined. In considering the outline application I have had regard to the other details shown on the submitted drawings as illustrative material not forming part of the application.
6. The application was refused by Waverley Borough Council (WBC) for five reasons, citing conflict with policies of the Waverley Borough Local Plan 2002 (WBLP). Some of these policies have since been replaced by policies in the Waverley Borough Local Plan Part 1: Strategic Policies and Sites, which was adopted in February 2018 (LPP1). Reason for refusal 2 concerning affordable housing has been addressed in a planning agreement. Concerns about flood risk (Reason 3) have been overcome by submission of an amended flood risk assessment. WBC has agreed that market housing mix (Reason 4) is a matter that could be addressed on the submission of reserved matters. Reason 5 concerned financial contributions, which are now covered by planning obligations. However, the first reason for refusal remains. This provides that the proposal, as a result of the urbanising impact and harm to the landscape character would cause material harm to the intrinsic character, beauty and openness of the Countryside beyond the Green Belt, the AONB and the AGLV.
7. Planning obligations would provide 10 affordable dwellings (6 rented and 4 shared ownership), financial contributions towards playing pitches, playground, sport and leisure, waste and recycling. A contribution would also be made towards early years and primary education. A unilateral undertaking sets out provisions concerning the trees along the access driveway. This provides that land containing the trees shall not be transferred with the demise of any dwelling within Area A, and shall at all times be managed by a person or body who is not or does not consist of an owner or occupier of a dwelling within Area

¹ A planning condition suggested at the Inquiry would preclude development outside Area A, Area B, Area C and Area D.

² ID22.

- A. It adds that the reserved matters application shall be accompanied by a scheme for the long term succession of the existing avenue of trees along this driveway. A contribution towards secondary education is disputed, but provision has been made in a deed of variation to provide a contribution in accordance with a formula, if necessary.³
8. In addition to the accompanied site visit on 19 November, I undertook unaccompanied visits on 12 October to draft allocation sites at Red Court (DS18), land south-east of Haslemere Water Treatment Works (DS11) and land adjacent to the Royal Oak (DS21). I also walked Footpath 35 between Hedgehog Lane and the A287, and visited the Branscombe House site. Closing submissions were in writing.⁴ The Inquiry was subsequently closed in writing on 27 December 2018.

Main issues

9. The main issues in this appeal are the effects of the proposed development on:
- (a) The character and appearance of the area and the AONB.
 - (b) Highway safety.
 - (c) Supply of housing land.

Planning policy

10. I am required to decide this appeal having regard to the development plan, and to make my determination in accordance with it, unless material considerations indicate otherwise. The development plan for the area includes LPP1 and saved policies of WBLP.
11. LPP1 Policy RE1 provides that in areas shown as Countryside beyond the Green Belt on the Adopted Policies Map, such as the appeal site, the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF.
12. LPP1 Policy RE3 states, amongst other things, that new development must respect and where appropriate, enhance the distinctive character of the landscape in which it is located. With regard to the AONB it adds that the protection and enhancement of the character and qualities of the AONB that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB Management Plan, and notes that the setting of the AONB will be protected where development outside its boundaries harm public views from or into the AONB. Part of the appeal site lies with a local landscape designation (AGLV), where the same principles for protecting the AONB will apply, and which will be retained for its own sake and as a buffer to the AONB.
13. LPP1 Policy SP1 applies the presumption in favour of sustainable development as it was expressed in the 2012 version of the NPPF. Policy ST1 concerns sustainable transport. Policy AHN1 deals with affordable housing. Policy TD1 ensures that the character and amenity of the Borough are protected by, amongst other things, requiring new development to be of a high quality and inclusive design that responds to the distinctive local character of the area, and ensuring that it creates safe and attractive environments that meet the needs

³ ID33.

⁴ ID38-ID40.2.

- of users and incorporate the principles of sustainable development. Policy HA1 concerns the protection of heritage assets. Policy NE1 seeks to conserve and enhance biodiversity.
14. LPP1 requires a minimum of 990 dwellings to be provided in Haslemere during the plan period. WBC is progressing Local Plan Part 2. A Regulation 18 Preferred Options consultation was undertaken in May and July 2018 (eLPP2). The appeal site was proposed as a housing allocation in the preferred Options Consultation version of eLLP2. Land to the north of the appeal site at Sturt Farm, with planning permission for 135 dwellings, was proposed in eLPP2 to be included with the revised settlement boundary for Haslemere. However, progress on eLPP2 has been deferred.⁵
 15. Paragraph 11 of the revised *National Planning Policy Framework* (hereinafter the *Framework*) sets out how decisions should apply a presumption in favour of sustainable development. The *Framework* states that to support the Government's objective of significantly boosting the supply of homes, it is important, amongst other things, that a sufficient amount and variety of land can come forward where it is needed. Paragraph 73 requires local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against its housing requirement set out in its adopted strategic policies. Paragraph 172 of the *Framework* provides that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs which have the highest status of protection in relation to these issues.
 16. Guidance about housing land availability assessment is provided in the *Planning Practice Guidance* (hereinafter the *Guidance*).
 17. In re-determining the appeal I have had regard to the purpose of conserving and enhancing the natural beauty of the AONB in accordance with section 85(1) of the Countryside and Rights of Way Act 2000.

Reasons

Character and appearance

18. The proposed development in Areas B, C and D would alter, replace or be closely associated with, existing built form in the AONB. I have no reason to disagree with the parties that the proposals for these areas would conserve the landscape and scenic beauty of the AONB. However, the scheme for Area A is a matter of dispute.
19. The *Guidelines for landscape and Visual Impact Assessment* (GLVIA3) stresses the distinction to be made between landscape character and visual effects.⁶ Both experts at the Inquiry accepted that this distinction applies also to the terminology used in paragraph 172 of the *Framework*. Area A is well screened in views from public vantage points. The only likely view point where residential development would be apparent in filtered glimpses through vegetation would be from a small section of Footpath 35. However, the appellant's landscape expert acknowledged at the Inquiry that an adverse

⁵ ID26.

⁶ GLVIA3 is the Third Edition published by the Landscape Institute and the Institute of Environmental Management and Assessment.

- impact on landscape character could not be moderated by screening.⁷
20. The appellant argues that it is on-site landscape character impacts alone that are at issue here. I do not accept this because GLVIA3 advises that the area of landscape that needs to be covered in assessing landscape effects should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. In this case, I consider that this encompasses at least part of the grounds of Longdene House given the location of the access drive and the avenue of trees along it. The proposal would not conflict with LPP1 Policy HA1 by reason of harm to parkland of heritage significance, but this tree-lined approach through open countryside, to what was a country house with some parkland features, makes an important contribution to the landscape character of this part of the AONB.
 21. The character of the area is affected to some degree by activity associated with the office use of Longdene House, and the tranquillity of the area is sometimes interrupted by background noise from road traffic, trains and aeroplanes. Nevertheless, the proposed residential development of Area A would introduce an urban form of development and associated activity into a countryside location, resulting in a loss of openness and local distinctiveness. I consider that the appellant has understated the likely impact of the appeal scheme on the landscape character of the area. I also have concerns about the proposed details for access and landscaping, and the resultant impact on the character and appearance of the area, which I raised at the Inquiry.
 22. Access and landscaping details for approval in Area A are shown on Drawings 16-T001-07 Site Access Options – Scheme B, 1027.2.04A Landscape Masterplan (25 Unit Scheme) and 1027.2.07 Land Adjacent to Main Access (Area A) 25 unit scheme.
 23. Access here means the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.
 24. Landscaping here means the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area, including screening by fences and wall, planting of trees, hedges, shrubs or grass, formation of banks and terraces, provision of gardens and other amenity features.
 25. It was clarified at the Inquiry that granting outline permission, with the proposed access and landscaping details, would for Area A determine the position of the cul-de-sac and circulation routes, along with the location of various landscape features. The latter would include the location of tree and shrub planting to either side of the estate road, the siting of hedgerow planting to define rear garden areas, and the position of grass verges and tree planting. This would effectively negate any scope for a reserved matter application to propose plot boundaries other than those shown on the submitted drawings. This would constrain the layout of dwellings, which is a reserved matter.

⁷ In the quashed decision, at paragraph 19, the previous Inspector concluded that due to the screening there would be a moderate adverse impact on the landscape character within the tightly drawn Area A with only slight adverse impacts beyond the red line application area. Paragraph 55 of the quashed decision gives great weight to the harm to the landscape character of the AONB, but goes on to state that the extent of the harm would be limited to Area A visible from a point on the footpath, the field itself and views from the access drive.

26. Area A is bounded by mature trees, some of which are more than 20 m high. Given the determination of the landscaping and access details, I consider that the scope for siting dwellings so as to minimise potential harm to nearby trees would be limited.⁸ I share WBC's concern that the outline planning permission proposed would be likely to result in long term harmful effects on nearby large trees arising from pressure by future occupiers to cut or lop trees because of shading or other adverse effects of large trees near to dwellings. I have taken into account the unilateral obligation, which would separate responsibility for the trees from the owners/occupiers of the proposed dwellings. If there was any consensus at the Inquiry by the experts about this resolving the matter, it is not a view that I share. The obligation cannot guarantee that any such pressure could be successfully resisted. Owners/occupiers can be very persuasive, particularly where dwellings have been sited too close to large trees. I do not consider that reliance should be placed on the obligation to safeguard the trees.
27. The tall trees along the driveway adjoining Area A are a significant feature of the local landscape and are visible from vantage points in the wider area. If pressure from owners/occupiers resulted in their loss or cutting back that would harm the local distinctiveness of the area. In coming to this finding I have had regard to the pattern of development in Haslemere, where many dwellings are set within mature vegetation, often on sloping sites. But it seems to me that within this part of the AONB the loss or diminution of such a significant landscape feature would harm the character and appearance of the area.
28. WBC is also concerned about the urbanising impact of the proposed cul-de-sac development. This is a form of development that is apparent in nearby parts of Haslemere. But the urban road configuration proposed for Area A would not accord with its location within the setting of a former country house in this part of the AONB. Area A is separated from the development permitted at Sturt Farm by a field which is proposed to be woodland planting and by Footpath 35. I consider that Area A relates more to the rural setting of Longdene House than it does to the proposed extension to the urban area at Sturt Farm, and that this should be properly reflected in the access and landscaping details.
29. In this context, I consider that the proposed cul-de-sac arrangement would fail to take the opportunities available here for improving the character and quality of the area and the way it functions, contrary to paragraph 130 of the *Framework*. The appeal scheme would also be at odds with paragraph 127, which provides that decisions should ensure that development, amongst other things, adds to the overall quality of the area, is sympathetic to local character, and establishes or maintains a strong sense of place, using the arrangement of streets and spaces to create attractive and distinctive places. Were the proposed access and landscaping details to be permitted, I am not satisfied that there would be a reasonable prospect of devising a reserved matter scheme that complied with LPP1 Policy TD1.
30. Taking all the above into account, I find that the appeal scheme would have an adverse effect on the landscape character of the area, not just for the site itself, of major significance. Given the limited visibility into the site from public

⁸ In the quashed decision at paragraph 16, concerning the trees coming under pressure for crown reduction and/or removal due to shading, the previous Inspector stated that although the area would be quite densely developed, the dwellings could be sited to minimise this.

- vantage points, but having regard to the visual significance of the avenue of trees, I consider that the proposal would have an adverse visual effect of minor/moderate significance.
31. Having regard to the nature, scale and setting of the proposal, along with its likely impact on the purposes of the designation, I do not consider that the appeal scheme represents major development in the AONB for the purposes of applying national policy. This is not now disputed by WBC. I also consider that the proposed alterations to Longdene House would be beneficial. Nevertheless, for the reasons set out above, I have found that the proposal would be likely to result in harm of major significance to landscape character, and of minor/moderate significance to visual amenity. This would result in significant overall harm to the character and appearance of the area.
 32. I have considered whether it would be appropriate to grant outline planning permission with all matters reserved for later consideration. However, in the absence of an illustrative layout that demonstrated the likely feasibility of designing a policy compliant scheme for 25 dwellings on Area A, I do not consider that it would be reasonable to do so.
 33. On the first main issue, I consider that the outline proposal, with the submitted access and landscaping details, would be likely to result in a scheme that had a significant adverse effect on the character and appearance of the area. This would not conserve or enhance the landscape and scenic beauty of the AONB. The resultant harm, in accordance with the *Framework*, should be given great weight in the planning balance. The proposal would not safeguard the intrinsic character of the countryside and so would be at odds with LPP1 Policy RE1. It would also conflict with LPP1 Policy RE3 because it would not respect the distinctive character of the landscape. LPP1 Policies RE1 and RE3 are consistent with the revised *Framework*.

Highway safety

34. Highway safety is not an issue for WBC, but is of great concern to local residents. There is concern about the junction of Hedgehog Lane, Courts Hill Road and Longdene Road, and the potential for increased danger at major roads such as the A286 and B2131. There is particular concern that the pavements are inadequate for pedestrians to access the railway station and town centre.
35. Local reservations about the impact of additional vehicles on the road network are not without foundation given the configuration of some of the local road junctions, along with the horizontal/vertical alignment and width of some of the routes that future occupiers of the proposed development and their visitors would be likely to use. The local network is not ideal, particularly for vulnerable road users, such as pedestrians and cyclists. However, I am not convinced that the appeal scheme would make the existing situation materially worse. The existing office use of Longdene House, with its large car park, generates considerable traffic on the local roads, which includes delivery vehicles. The proposed residential use of Longdene House and the additional dwellings would change the nature and timings of trips to and from the site, and possibly the mix of modes of transport. But overall, I consider that the proposed development would be unlikely to significantly alter the current risks to road users.

36. It seems to me that the many constraints on the local network, which were apparent at my accompanied and unaccompanied site visits, serve to keep vehicle speeds low, and encourage drivers to adopt a cautious approach. I see no reason why this should be any different with residential development of the appeal site. Taking into account all the evidence adduced at the Inquiry, and from my site visits, I do not consider that the proposal would be likely to result in an unacceptable adverse effect on highway safety. Available routes to the town centre and railway station are not so dangerous that they would render the location unsuitable for further residential development.
37. Local apprehension about risks to vulnerable road users is understandable, but I do not consider that any resultant harm to highway safety should weigh significantly against the proposal. I find no conflict with LPP1 Policy ST1. Residual cumulative impacts on the road network would not be severe, and any increased risk to highway safety would fall far short of an unacceptable impact that would, in accordance with the *Framework*, justify preventing the development on highway grounds.

Housing supply

38. WBC updated its 5 year supply using a 1 April 2018 base date to demonstrate a 5.8 years' supply, with a 5% buffer as was applied by the Local Plan Inspector. The appellant disputes this and considers that with a 5% buffer there is only 3.37 years' supply.⁹ I note that Inspectors in other appeals have recently found a 5 years' supply, largely on the basis of maintaining the Local Plan Inspector's conclusions. However, the provisions of the revised *Framework* make it more difficult to place such reliance on the Local Plan Inspector's finding that WBC could demonstrate a 5 year supply of deliverable housing sites.
39. I share some of the appellant's concerns about the implications of changes in the *Framework* to the definition of 'deliverable' in assessing housing land supply, along with the requirement for 'clear evidence' required by the *Guidance*. The onus is on WBC, for sites with outline permission or allocated in a development plan, to provide clear evidence to demonstrate that housing completions will begin on site within 5 years. I am not convinced that the evidence adduced by WBC is sufficient to demonstrate deliverability for all the sites with outline planning permission. However, I do not discount sites where reserved matters applications were subsequently submitted, but which were shown to be deliverable at the base date by reason of progress made towards the submission of an application or with site assessment work.
40. Urban and Rural LAA sites could potentially contribute to supply provided that there was clear evidence that completions will begin on site within 5 years. However, I consider that WBC's submissions about the deliverability of these sites falls short of the clear evidence now required. Many of the Rural LAA sites are located in the Countryside beyond the Green Belt, or in the Green Belt, the AGLV or the AONB. There is no clear evidence about the deliverability of these sites, particularly where progress on eLLP2 has been deferred.
41. Footnote 39 of the *Framework* provides that from November 2018 significant under delivery would be measured against the Housing Delivery Test (HDT).

⁹ ID15 Table 2 indicates that this is based on deleting from WBC's total supply of 5,287 units the following: 1,159 units from outline permissions, 487 units from Urban LAA sites and 574 units from Rural LAA sites.

However, the HDT assessments have not yet been published, and paragraph 215 of the *Framework* states that the test will apply from the day following the publication of its results. I do not consider that it would be appropriate in advance of the publication of the HDT assessment to require a 20% buffer. ID15 Table 3 indicates that, with a 5% buffer, if the outline consents alone were deleted there would be 4.5 years' supply, and if the outline consents were included but both Urban and Rural LAA sites deleted there would be 4.6 years' supply. On the evidence before me, I find that the housing land supply here would be between 3.37 years and 4.6 years. There is not enough information about individual sites for me to assess where within this range the current supply falls. Nevertheless, this is a significant shortfall.

42. The additional dwellings from the proposed development would make a significant contribution to the supply of housing in Haslemere. The provision of 10 affordable dwellings would be particularly important in providing for local needs and would comply with LPP1 Policy AHN1. Given the housing land supply situation and the degree of shortfall, these are benefits which should be given significant weight in the planning balance.

Other matters

43. The appeal site lies within 5 km of the Wealden Heaths Special Protection Area (SPA). The scheme does not propose any mitigation for any adverse impact on the SPA. Natural England (NE) considers, given the size and scale of the proposal that it would not lead to a likely significant effect upon the integrity of the SPA, either alone or in combination. Accordingly, NE does not consider it necessary for an Appropriate Assessment (AA) to be undertaken. I note that an AA was completed by WBC in determining a duplicate application for the appeal site (Application Ref.WA/2018/0151), and that NE was happy with the outcome of that assessment.¹⁰ However, I am satisfied on the evidence before this Inquiry that the proposal, alone or in combination, is not likely to have a significant effect on the interest features of the SPA.¹¹ It is not, therefore, necessary to undertake an AA. WBC now concurs with this finding.
44. The proposal would provide employment during construction and future residents would contribute to the local economy. The proposed landscaping and ecological enhancements would be beneficial for wildlife, and so the scheme would gain some support from LPP1 Policy NE1. These are benefits which should be given moderate weight in the planning balance.
45. I have taken into account all the other matters raised in the evidence, including the appellant's submission that some development of AONB land will inevitably be required to meet LPP1 requirements for housing in Haslemere. But this is a matter for eLPP2, and I do not consider that it should be a decisive consideration in determining this appeal. The fact that work on eLPP2 has been deferred does not, in my view, alter this finding. Similarly, it is not very helpful in deciding the appeal on its planning merits to draw comparisons with other possible housing sites in the wider locality. It is not possible in this section 78 appeal to consider all the relevant matters, along with the views of interested parties, on the different sites likely to be required to meet the housing requirement in Haslemere. Neither these, nor any of the other matters raised, are sufficient to outweigh my conclusions on the main issues, which have led to my decision on this appeal.

¹⁰ This duplicate application was refused in August 2018 against officer recommendation for approval.

¹¹ ID16.

Conclusions

46. The scheme would gain some support from development plan policies that seek to provide housing in Haslemere, and to increase the supply of affordable housing and enhance biodiversity, but would conflict with LPP1 Policies RE1 and RE3. I find that overall the proposal would be contrary to the provisions of the development plan taken as a whole. The proposal does not accord with an up-to-date development plan and so *Framework* paragraph 11 c) does not apply.
47. I have found that WBC cannot demonstrate a 5 year supply of deliverable housing sites, and so paragraph 11 d) is engaged by virtue of Footnote 7. Paragraph 11 d) i. refers to the application of *Framework* policies that protect areas or assets of particular importance. The appellant argues that no such policies are engaged in this case. I disagree. In paragraph 11 d) i. the reference to “protect” has its ordinary meaning to keep safe, defend and guard. It seems to me that that is precisely what paragraph 172 seeks to achieve with respect to landscape and scenic beauty in AONBs. This *Framework* policy for AONBs states that they have the highest status of protection in relation to conserving and enhancing landscape and scenic beauty, and that within AONBs the scale and extent of development should be limited. The inclusion of AONBs in Footnote 6 brings into play the whole of paragraph 172, not just that part which deals with major development, as the appellant’s closing submissions seem to imply.
48. Given my findings about the effects on the character and appearance of the area, as set out above, I consider that applying *Framework* policies for the AONB here provides a clear reason for refusing the proposed development. So the provisions of paragraph 11 d) i. disengage the tilted balance. Therefore, the planning balance in this case is a straight or flat balance of benefits against harm.
49. The appeal scheme would provide additional housing in Haslemere, including affordable units, in an area of need. There would also be some benefits to the local economy and to biodiversity. But in my judgement these benefits would be outweighed by the harm to the character and appearance of the area, along with the harm to the AONB which attracts great weight. I find that the planning balance falls against the proposal.
50. The proposal would be contrary to the provisions of the development plan taken as a whole. It would not gain support from the *Framework*. There are no material considerations here which indicate that the determination of the appeal should be other than in accordance with the development plan.
51. For the reasons given above and having regard to all other matters raised, I conclude that the appeal should be dismissed. It is not, therefore, necessary for me to deal with the disputed contribution towards secondary education.

John Woolcock
Inspector

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Ashley Bowes
of Counsel

Instructed by Lewis Jones
Planning Solicitor for Waverley Borough
Council

He called

Andrew Cook BA(Hons) MLD CMLI
MIEMA CEnv MID

Director Pegasus Group

Brian Woods BA(Hons) MRTPI
ONC

Managing Director WS Planning & Architecture

FOR THE APPELLANT:

Charles Banner
of Counsel

Instructed by David Neame
Director Neame Sutton Limited

He called

Dominic Farmer BSc(Hons) MSc
CEnv MCIEEM

Ecology Solutions Ltd

Colin Brown BSc(Dual Hons)
DipLD MA

Principal LanDesign Associates

Clive Burbridge BSc(Hons) MSc
MRTPI MCIT MCILT

Director Icen Projects Ltd

David Neame BSc(Hons) MSc
MRTPI

Director Neame Sutton Limited

INTERESTED PERSONS:

Dr Philippa Guest
Michael Barnes
Guy Reynolds

On behalf of CPRE Surrey
On behalf of Longdene Action Group
Local resident

DOCUMENTS SUBMITTED AT THE INQUIRY

Document	1	Appeal Ref: APP/W3520/W/18/3194926 Land on east side of Green Road Woolpit
Document	2	Extracts from the <i>Planning Practice Guidance</i>
Document	3	Schedule of suggested conditions
Document	4.1	<i>Park Lane Homes v SSHCLG</i> CO/3142/2018
Document	4.2	<i>Boddington v British Transport Police</i> (H.L.(E.))
Document	4.3	<i>West Lancashire BC v SSCLG</i> CO/4913/2016
Document	4.4	<i>Arun DC v SSCLG</i> CO/336/2012
Document	4	<i>North Norfolk DC and SSHCLG</i> CO/1319/2018
Document	5	Appellant's opening statement
Document	6	Opening submissions on behalf of the local planning authority
Document	7	Written Statement by Haslemere Vision
Document	8	Statement by Dr Philippa Guest on behalf of CPRE Surrey
Document	9	Email from WBC dated 1 October to those promoting housing sites concerning updated delivery rates
Document	10	Statement by Michael Barnes including petition
Document	11	Statement by Guy Reynolds including comments on traffic video addendum and script to addendum on traffic
Document	12.1	Draft s106 agreement
Document	12.2	Summary of s106 agreement
Document	13	Photographs of Red Court
Document	14	Plan by Mr Cook annotated with parkland area
Document	15	Housing Land Supply – Position Statement
Document	16	Addendum Note by Dominic Farmer on European Designated Site issues
Document	17	Note from Mr Woods documenting oral update to Inquiry concerning Appendix 3 and Appendix 9
Document	18	Aerial photograph of Red Court
Document	19	Email dated 10 October 2018 from Mr Barnes including letter from appellant dated 10 October 2018
Document	20	Housing Delivery Test Measurement Rule Book
Document	21	Draft unilateral undertaking
Document	22.1	Appellant's note on Sturt Farm SANG
Document	22.2	Outline planning permission dated 30 march 2015 for 135 dwellings at Sturt Farm
Document	22.3	Planning agreement dated 18 April 2018 for Sturt Farm which includes SANG obligations
Document	22.4	Plan showing approved landscaping details
Document	22.5	Planning permission for SANG dated 20 April 2018
Document	22.6	Plan for reserved matter application for Sturt Farm
Document	23	Dictionary definitions for 'parkland' and 'pastoral'
Document	24	Appellant's bundle of photographs 1-12
Document	25	Email from Natural England concerning Waverley Local Plan Part 2 dated 30 October 2018
Document	26	Waverley BC press release dated 29 October 2018 re deferring Local Plan Part 2
Document	27	Extract Hazlemere Herald 1 November 2018 re Housing site allocations withdrawn
Document	28	Sites with Outline Consent referred to in Mr Woods' EiC note
Document	29	Urban LAA Sites – October 2018
Document	30	Rural LAA Sites – October 2018

Document	31	Note on Housing Delivery Test
Document	32	Technical consultation on updates to national planning policy and guidance MHCLG October 2018
Document	33.1	Unilateral undertaking pursuant to s106 dated 14 November 2018
Document	33.2	Deed pursuant to s106 dated 16 November 2018
Document	33.3	Summary of S106 agreement & unilateral undertaking
		Note on R123 compliance: Secondary School Contribution
	33.4	Deed of Variation dated 20 December 2018
Document	34	Press Release re new timeline for eLPP2
Document	35.1	Transport Note dated 16 November 2018
Document	35.2	Qualifications and experience Clive Burbridge
Document	36	Suggested planning conditions
Document	37	Statement from Surrey County Council in support of a s106 contribution for secondary education
Document	38	Closing statement on behalf of the Longdene Action Group
Document	39	Closing submissions on behalf of the local planning authority and judgments
Document	40.1	Appellant's closing submissions and judgments
Document	40.2	Appendix : Legal submissions on the relevance of the previous Inspector's decision

PLANS

Full Application

078-PL-02	Existing Site Plan
074-PL-001 Rev. A	Location Plan
078-PL-017	Existing Block and Demolition Plan
079-PL-018	Proposed Blocks
078-PL-050	Existing Floor Plans Cottages
078-PL-051	Existing Elevations 1 Cottages
078-PL-052	Existing Elevations 2 Cottages
078-PL-053	Existing Glasshouse
078-PL-054	Existing Store 1
078-PL-055	Existing Store 2
1027.2.08	Semi-Detached Dwellings (Area B), Longdene House (Area C), Glasshouse/Outbuildings (Area D)
078-PL-020	Existing Basement
078-PL-021	Existing Ground Floor Plan
078-PL-022	Existing First Floor Plan
078-PL-023	Existing Second Floor Plan
078-PL-024	Existing Roof Plan
078-PL-025	Existing South Elevation
078-PL-026	Existing West Elevation
078-PL-027	Existing North Elevation
078-PL-028	Existing East Elevation
078-PL-030 Rev. A	Basement
078-PL-031	Ground Floor Plan
078-PL-032	First Floor Plan
078-PL-033	Second Floor Plan
078-PL-034	Roof Plan
078-PL-035 Rev. A	South Elevation
078-PL-036 Rev. A	West Elevation
078-PL-037 Rev. A	North Elevation
078-PL-038 Rev. A	East Elevation
078-PL-040	Garage Plans
078-PL-041	Garage Elevations
9172/01 Rev A	1/3 Tree Constraints Plan
9172/01 Rev A	2/3 Tree Constraints Plan
9172/01 Rev A	3/3 Tree Constraints Plan
9172/03	1/3 Tree Protection Plan
9172/03	2/3 Tree Protection Plan
9172/02	3/3 Tree Protection Plan
114543/9001	Development Area and Source Protection Zones Site Plan

PLANS

Outline Application

078-PL-02	Existing Site Plan
074-PL-001 Rev. A	Location Plan
078-PL-017	Existing Block and Demolition Plan
1027.2.04A	Landscape Masterplan (25 Unit Scheme)
1027.2.07	Land Adjacent to Main Access (Area A) 25 Unit Scheme
16-T001 07	Site Access Options – Scheme B
9172/03 2/3	Tree Protection Plan
9172/01 Rev A 2/3	Tree Constraints Plan
Plan 1027.2.04B	Landscape Masterplan

HLS Appendix 3: Large site commitments – list of sites removed

HLS Appendix 3: Large site commitments – list of sites removed

Site	Planning Reference	Number of units removed	Reason for removal
Wings Nursery		55	Outline Consent only granted. No evidence available on delivery and detailed consent was recently withdrawn.
Carlton Avenue		8	Outline consent 8th august 2018, note on file that one owner refuses to sell. Revised application submitted, but yet to be determined and no details provided as to deliverability, given previous landowner issue.
Land West of Brook Lane & South of A259 Angmering		90	Consented Jan 2018. Reserved matters yet to be confirmed.
Arundel Road, Angmering	A/122/19/OUT	160	Outline Consent only granted. No evidence available on delivery.
Eastergate Fruit Farm		60	Planning permission lapsed
New Barn Lane	BE/77/16/OUT	50	Outline Consent only granted. No evidence available on delivery.
Canada Road	AB/4/18/PL	4	Demolition of 4, permission for 5. Net gain of 1 dwelling, not 5.
Hook Lane	BR/139/18/OUT	1	Reserved matters yet to be submitted. Outline consent expires November 2021. No evidence that site will come forward. Proposal comprises a net gain of 5 dwellings, following demolition of existing dwelling.
Richmond Arms	BR/142/18/OUT & BR/8/21/RES	1	Proposal is 10 units demolition of 1, so net increase of 9. Reserved matters yet to be submitted. Reserved matters refused February 2021. Outline consent expires in January 2022.
Land West of Church Lane & South of Horsemere Green Lane, Climping	CM/1/17/OUT	100	300 total but 100 in first 5 years considered to be realistic, given significant archaeological find on site, which is subject to on-going investigation.
Westholme Nursey	LU/94/17/OUT	10	Planning permission lapsed
Directors Cottage	LU/249/17/PL	1	Demolition of 1, permission for 5. Net gain of 4 dwellings only.
Inglecroft	LU/272/17/OUT	1	Planning permission lapsed
Pier Road	LU/287/17/PL	8	Planning permission lapsed
Old Mead Road	LU/258/16/PL	4	Planning permission lapsed

Yapton Road (Poultry Farm)	M/45/16/PL	13	Planning permission lapsed. 66 bed care home approved
Land South of Summer Lane & West of Pagham Road, Pagham	P/140/16/OUT	150	150 in first five years removed as reserved matters yet to be approved and no clear evidence of delivery.
Church Barton House, Horns Lane, Pagham	P/25/17/OUT	65	Ransom situation regarding access, which remains unresolved.
Barnfield House, Arundel Road, Fontwell	WA/23/17/OUT	22	Planning permission lapsed
Land to the East of Fontwell Avenue, Fontwell	WA/48/19/RES	25	Given timescale to implement, suggest that 25 units taken off the 5 year period.
Land South of Arundel Road, Walberton	WA/63/19/PL	8	Not currently deliverable and holding requirement by Highways England to deliver new pedestrian / cycle path associated with the A27 road improvement scheme
Total		836	

HLS Appendix 4: Strategic Allocation sites – list of sites removed

HLS Appendix 4: Strategic Allocation sites – list of sites removed

Site	Number of units removed	Reason for removal
Bridge & Old Cottage	27	Site was subject to a refused planning application and subsequently dismissed appeal.
Ryefield Farmhouse	10	Site was subject to a refused planning application and subsequently dismissed appeal.
Pye Homes at Woodgate Centre	160	Application submitted, but yet to be determined. Site also subject to previous refusal, which was dismissed at appeal on sustainability grounds. In the absence of the wider site coming forward, no change in circumstances to warrant approval of an unsustainable site, in my opinion
Westergate Street (CALA)	200	Application submitted, but yet to be determined. Site also subject to previous refusal on a number of grounds, but principally on lack of agreement of infrastructure costs and delivery.
Fordingbridge (Barratts)	150	Application yet to be prepared and submitted.
BEW	50	No planning permission exists for the site and no clear evidence on how site could come forward.
Little Warwick	7	No planning permission exists for the site and no clear evidence on how site could come forward.
Kinnersley	7	No planning permission exists for the site and no clear evidence on how site could come forward.
Worthing Rugby Club	60	Site not currently available for development. First require relocation of rugby club site, for which no options have been agreed.
Arundel Road and Dappers Lane	1	Proposal comprises a net gain of 84 dwellings, as permission includes loss of existing dwelling.
Chalcroft Cottage	22	Site not currently available for development.
New Barn Lane	350	No planning permission exists for the site and no clear evidence on how site could come forward.
Ford (Years 4 & 5)	150	No planning permission exists for the site and no clear evidence on how site could come forward. Current outline permission being considered, but yet to be determined.
Osbourne Refrigeration	25	No planning permission exists for the site and no clear evidence on how site could come forward.

1219

HLS Appendix 5: Email correspondence with Robin Shepherd

From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED] un HLS
Date:
Attachments:

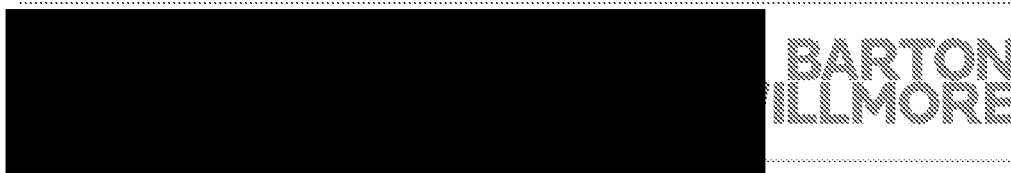
Morning Peter. Early start for you today!

When there were delays / no way forward, I wrote to Neil Crowther in response to his request for details of anticipated delivery rates, explaining that until we had made progress, we couldn't respond. I had no reply! If you need this, then let me know.

We will pull something together and come back to you.

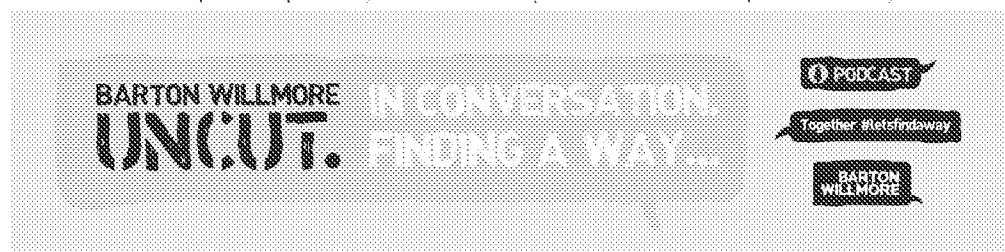
Robin

Robin Shepherd
Partner



Consider the environment, do you really need to print this email?

The information contained in this e-mail (and any attachments) is confidential and may be privileged. It may be read, copied and used only by the addressee. Barton Willmore accepts no liability for any subsequent alterations or additions incorporated by the addressee or a third party to the body text of this e-mail or any attachments. Barton Willmore accepts no responsibility for staff non-compliance with our IT Acceptable Use Policy.



From: Peter Cleveland <[REDACTED]>
Sent: Friday, August 27, 2021 5:38 am
To: Robin Shepherd; Jen Samuelson
Subject: Ford -- deliverability for purposes of Arun HLS

Hi Robin & Jen

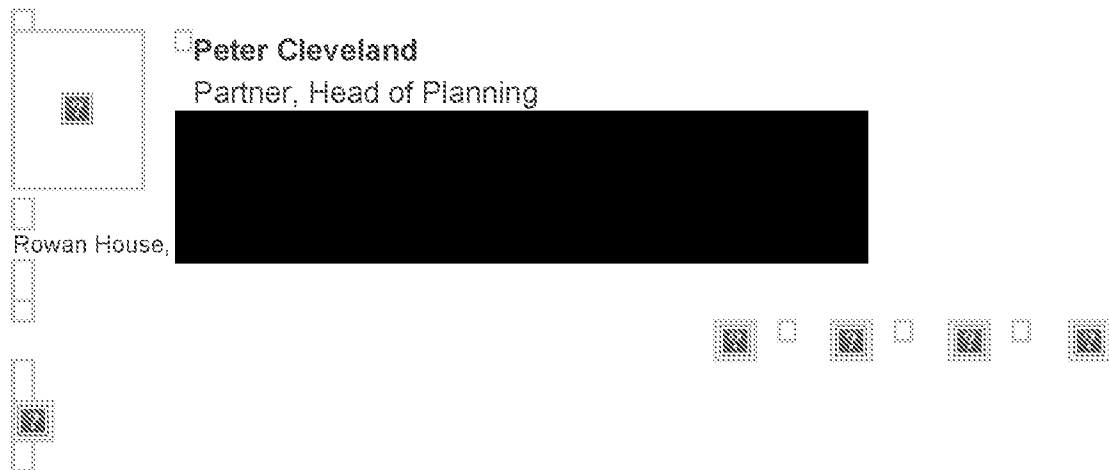
I mentioned a few months back (to Robin) that we are carrying out a review of Arun DC HLS and I wondered if you might be able to help me with a response on Ford, which they have down to deliver 150 dwellings in the next 5 years. Whilst it doesn't meet the 'deliverable' test in the absence of a planning permission, could you advise what you believe the timescale is for delivery of housing at Ford, in the context the NPPF tests of deliverable.

I note that you had previously advised Arun on how many units could be delivered, but that was prior to significant delays on the current application.

Once we have completed the review, I would be pleased to provide our overall thoughts, if that is of interest.

Thank you for any assistance you might be able to provide.

Kind regards,
Peter



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HLS Appendix 6: 'Deliverable' HELAA sites – list of sites removed

HLS Appendix 6: 'Deliverable' HELAA sites – list of sites removed

Site	Planning Reference	Number of units removed	Reason for removal
Avenals Barn		25	No planning permission. Flood zone, limited availability for housing due to sites topography.
The Beach Hotel, former Mud Club, Waterloo Square, Bognor Regis	BR/244/20/PL	23	Application live for 10 units, remains undecided.
Gordon Avenue		11	County Council owned site and there are legal issues preventing the sites delivery.
Sussex Works, Rustington		6	Requires a high density of 75dph and comprises a site to the rear of shopping parade. Not considered deliverable and no evidence to demonstrate is deliverability.
Rustington House, Hargreaves House		25	Site is a Listed Building and currently comprises office which is operational. Loss of office space would have to be demonstrated, which would require marketing and demonstration that no demand, which would be difficult based on current occupation. No clear evidence provided that housing could be delivered on site.
Clock House		13	Requires demolition of 5 dwellings and no evidence to demonstrate is deliverability.
Bartons Infant School		20	County Council owned site. It is a neighbourhood plan but has no planning permission. Currently no proposals for County Council to develop the site at present.
Total		123	

HLS Appendix 7: Full comparison of Housing Land Supply and housing trajectory

Housing Land Supply Evidence - Arun

				21-22	22-23	23-24	24-25	25-26		
Arun Expected Housing Requirement				Year	Yr1	Yr2	Yr3	Yr4	Yr5	
				No. units	1,368	1,368	1,368	1,368	1,368	
Arun AMR 2020 - Appendix 3 sites										
	Parish	Site	Ref.	Total commitment	Year	Yr1	Yr2	Yr3	Yr4	Yr5
Arun HCS	Aldingbourne	Nylon Nursery	AL/102/17/RES	158			98	90	9	
Henry Adams	Aldingbourne	Nylon Nursery	AL/102/17/RES	158			50	50	50	5
Arun HCS	Aldingbourne	Nylon Nursery (net increase of 10)	AL/13/19/PL	68				50	21	
Henry Adams	Aldingbourne	Nylon Nursery (net increase of 23)	AL/13/19/PL	23				23		
Arun HCS	Aldingbourne	Hook Lane	AL/13/19/PL	14			9	5		
Henry Adams	Aldingbourne	Hook Lane	AL/13/19/PL	14			9	5		
Arun HCS	Aldingbourne	Wings Nursery	AL/32/19/OUT	55				36	25	
Henry Adams	Aldingbourne	Wings Nursery	AL/32/19/OUT	55						
Arun HCS	Aldwick	34 The Drive		6						
Henry Adams	Aldwick	34 The Drive		6						
Arun HCS	Aldwick	Carlton Avenue	AW/130/18/OUT	8						8
Henry Adams	Aldwick	Carlton Avenue	AW/130/18/OUT	8						
Arun HCS	Angmering	West End Nursery	A/44/15/PL	30			30			
Henry Adams	Angmering	West End Nursery (CALA)	A/44/15/PL	30			30			
Arun HCS	Angmering	Manor Nursery	A/48/18/RES	32				12	20	
Henry Adams	Angmering	Manor Nursery	A/38/18/RES	32				12	20	
Arun HCS	Angmering	New place burgatow	A/85/18/RES	9				9		
Henry Adams	Angmering	New place burgatow	A/85/18/RES	9				9		
Arun HCS	Angmering	Merry England	A/168/18/RES	17			5	12		
Henry Adams	Angmering	Merry England	A/168/18/RES	17			5	12		
Arun HCS	Angmering	Quiet Waters	A/81/18/RES	19			8	11		
Henry Adams	Angmering	Quiet Waters	A/81/18/RES	19			8	11		
Arun HCS	Angmering	Brook Lane & South of A259	A/169/17/OUT	90					90	
Henry Adams	Angmering	Brook Lane & South of A259	A/169/17/OUT	90						
Arun HCS	Angmering	South of Water Lane	A/99/17/OUT	175				50	50	55
Henry Adams	Angmering	South of Water Lane	A/99/17/OUT	175				50	50	50
Arun HCS	Angmering	North of Water Lane	A/40/18/OUT	525						25
Henry Adams	Angmering	North of Water Lane	A/40/18/OUT	525						
Arun HCS	Angmering	Crete Nursery	A/104/19/RES	6			6			
Henry Adams	Angmering	Crete Nursery	A/104/19/RES	6			6			
Arun HCS	Angmering	Mayflower Way	A/46/19/PL	24					24	
Henry Adams	Angmering	Mayflower Way	A/46/19/PL	24					24	
Arun HCS	Angmering	Windy Ridge	A/219/17/PL	12			12			
Henry Adams	Angmering	Windy Ridge	A/219/17/PL	12			12			
Arun HCS	Angmering	The Laurels	A/166/18/RES	9				9		
Henry Adams	Angmering	The Laurels	A/166/18/RES	9				9		
Arun HCS	Angmering	Arundel Road	A/122/19/OUT	160					38	42
Henry Adams	Angmering	Arundel Road	A/122/19/OUT	160						
Arun HCS	Arundel	Canada Road	AB/4/18/PL	1						1
Henry Adams	Arundel	Canada Road	AB/4/18/PL	1						
Arun HCS	Barnham and Eastergate	Angels Nursery	BA/43/16/PL	95				50	45	
Henry Adams	Barnham and Eastergate	Angels Nursery	BA/43/16/PL	95				50	45	
Arun HCS	Barnham and Eastergate	Polards Nursery	BA/51/16/RES	2			2			
Henry Adams	Barnham and Eastergate	Polards Nursery	BA/51/16/RES	2			2			
Arun HCS	Barnham and Eastergate	The Lillies	BA/28/17/RES	38				21	7	
Henry Adams	Barnham and Eastergate	The Lillies	BA/28/17/RES	38				21	7	
Arun HCS	Barnham and Eastergate	Eastergate Fruit Farm	EG/6/18/RES	60						20
Henry Adams	Barnham and Eastergate	Eastergate Fruit Farm	EG/6/18/RES	60						
Arun HCS	Bersted	Policy 6 Ph 1	Various	2				2		
Henry Adams	Bersted	Policy 6 Ph 1	Various	2				2		
Arun HCS	Bersted	Policy 6 Ph 2	Various	1				1		
Henry Adams	Bersted	Policy 6 Ph 2	Various	1				1		
Arun HCS	Bersted	Policy 6 Ph 4	Various	23			15	8		
Henry Adams	Bersted	Policy 6 Ph 4	Various	23			15	8		
Arun HCS	Bersted	Policy Site 6	Various	22			11	11		
Henry Adams	Bersted	Policy Site 6	Various	22			11	11		
Arun HCS	Bersted	New Barn Lane	BE/113/17/RES	49			32	17		
Henry Adams	Bersted	New Barn Lane	BE/113/17/RES	49			32	17		
Arun HCS	Bersted	The Cottage	BE/116/17/OUT	21				1	20	
Henry Adams	Bersted	The Cottage	BE/116/17/OUT	21				1	20	
Arun HCS	Bersted	New Barn Lane	BE/77/16/OUT	50				28	17	
Henry Adams	Bersted	New Barn Lane	BE/77/16/OUT	50				28	17	
Arun HCS	Bognor Regis	Regis Centre	BR/156/16/PL	192				50	50	42
Henry Adams	Bognor Regis	Regis Centre	BR/156/16/PL	192				50	50	50
Arun HCS	Bognor Regis	London Road	BR/109/18/PL	5				5		
Henry Adams	Bognor Regis	London Road	BR/109/18/PL	5				5		
Arun HCS	Bognor Regis	Hook Lane	BR/139/18/OUT	5					5	
Henry Adams	Bognor Regis	Hook Lane	BR/139/18/OUT	5					5	
Arun HCS	Bognor Regis	Richmond Arms	BR/142/18/OUT	9					5	5
Henry Adams	Bognor Regis	Richmond Arms	BR/142/18/OUT	9					5	4
Arun HCS	Bognor Regis	Bradlaw House	BR/262/18/PL	5				5		
Henry Adams	Bognor Regis	Bradlaw House	BR/262/18/PL	5				5		
Arun HCS	Bognor Regis	Prince of Wales	BR/82/19/PL	6						
Henry Adams	Bognor Regis	Prince of Wales	BR/82/19/PL	6				6		
Arun HCS	Bognor Regis	Upper Bognor Road	BR/351/19/PL	6					6	
Henry Adams	Bognor Regis	Upper Bognor Road	BR/351/19/PL	6					6	
Arun HCS	Bognor Regis	Chichester Road	BR/324/17/PL	12				12		
Henry Adams	Bognor Regis	Chichester Road	BR/324/17/PL	12				12		
Arun HCS	Bognor Regis	Kew gardens	BR/63/19/PL	6						
Henry Adams	Bognor Regis	Kew gardens	BR/63/19/PL	6				6		
Arun HCS	Bognor Regis	Durban Road	BR/90/18/PL	14						14
Henry Adams	Bognor Regis	Durban Road	BR/90/18/PL	14						14
Arun HCS	Bognor Regis	High Street	BR/307/04	2						2
Henry Adams	Bognor Regis	High Street	BR/307/04	2						2
Arun HCS	Bognor Regis	The Royal Hotel	BR/257/17/PL	27				27		
Henry Adams	Bognor Regis	The Royal Hotel	BR/257/17/PL	27				27		
Arun HCS	Bognor Regis	56 High Street	BR/270/19/PL	9					9	
Henry Adams	Bognor Regis	56 High Street	BR/270/19/PL	9					9	
Arun HCS	Bognor Regis	Aldwick Road	BR/131/17/PL	16						16

Henry Adams	Bognor Regis	Aidwick Rest	BR/311/17/PL	16				16		
Arun HCS	Bognor Regis	Abbleyfield	BR/315/13/PL	8		8				
Henry Adams	Bognor Regis	Abbleyfield	BR/145/19/PL	8		8				
Arun HCS	Bognor Regis	Southdown Road	BR/255/13/PL	6			6			
Henry Adams	Bognor Regis	Southdown Road	BR/255/13/PL	6			6			
Arun HCS	Bognor Regis	Victoria Drive	BR/260/19/PL	5				5		
Henry Adams	Bognor Regis	Victoria Drive	BR/260/19/PL	5				5		
Arun HCS	Climping	Land south of Housemere Green Lane	CM/171/17/OUT	300				75	100	100
Henry Adams	Climping	Land south of Housemere Green Lane	CM/171/17/OUT	300						
Arun HCS	Climping	Land adj Scyld	CM/211/19/PL	9				9		
Henry Adams	Climping	Land adj Scyld	CM/211/19/PL	9				9		
Arun HCS	Climping	Langford	CM/64/17/PL	6				6		
Henry Adams	Climping	Langford	CM/64/17/PL	6				6		
Arun HCS	East Preston	Worthing Road	EP/121/17/PL	5				5		
Henry Adams	East Preston	Worthing Road	EP/121/17/PL	5				5		
Arun HCS	East Preston	Time Tree Close	EP/52/18/PL	7				7		
Henry Adams	East Preston	Time Tree Close	EP/52/18/PL	7				7		
Arun HCS	Felpham	Outwerwyke House	FP/311/17/PL	5		5				
Henry Adams	Felpham	Outwerwyke House	FP/311/17/PL	5		5				
Arun HCS	Felpham	Felpham Road	FP/171/18/PL	18		18				
Henry Adams	Felpham	Felpham Road	FP/171/18/PL	18		18				
Arun HCS	Ferring	J Sea Drive	FG/198/16/PL	7			8			
Henry Adams	Ferring	J Sea Drive	FG/198/16/PL	7			7			
Arun HCS	Ferring	Ferringham Lane	FG/27/18/PL	7				7		
Henry Adams	Ferring	Ferringham Lane	FG/27/18/PL	7				7		
Arun HCS	Ford	Burnell Road	F5/RES	24		23				
Henry Adams	Ford	Burnell Road	F5/RES	24		23				
Arun HCS	Littlehampton	Windroos	LU/201/16/RES	76		27	48			
Henry Adams	Littlehampton	Windroos	LU/201/16/RES	76		27	48			
Arun HCS	Littlehampton	Land north of Toddington Lane	LU/47/13	903		57	80	80	80	80
Henry Adams	Littlehampton	Land north of Toddington Lane	LU/47/13	903		50	50	50	50	50
Arun HCS	Littlehampton	Land north of Toddington Lane (ph 2)	LU/116/13	20			20			
Henry Adams	Littlehampton	Land north of Toddington Lane (ph 2)	LU/116/13	20			20			
Arun HCS	Littlehampton	Westholme Nursery	LU/94/17/OUT	10						
Henry Adams	Littlehampton	Westholme Nursery	LU/94/17/OUT	10						
Arun HCS	Littlehampton	Directors Cottage	LU/272/17/OUT	9						
Henry Adams	Littlehampton	Directors Cottage	LU/272/17/OUT	9						
Arun HCS	Littlehampton	Inglecroft	LU/342/17/OUT	10						
Henry Adams	Littlehampton	Inglecroft	LU/342/17/OUT	10						
Arun HCS	Littlehampton	Toddington Lane	LU/330/18/PL	77		15	44	18		
Henry Adams	Littlehampton	Toddington Lane	LU/330/18/PL	77		15	44	18		
Arun HCS	Littlehampton	Corfield Close	LU/330/18/PL	77		15	44	18		
Henry Adams	Littlehampton	Corfield Close	LU/330/18/PL	77		15	44	18		
Arun HCS	Littlehampton	Locomotive	LU/45/16/PL	12				12		
Henry Adams	Littlehampton	Locomotive	LU/45/16/PL	12				12		
Arun HCS	Littlehampton	River Road	LU/328/18/PL	8						
Henry Adams	Littlehampton	River Road	LU/328/18/PL	8						
Arun HCS	Littlehampton	South Terrace	LU/287/17/PL	8						
Henry Adams	Littlehampton	South Terrace	LU/287/17/PL	8						
Arun HCS	Littlehampton	Pier Road	LU/287/17/PL	8						
Henry Adams	Littlehampton	Pier Road	LU/287/17/PL	8						
Arun HCS	Littlehampton	Old Mead House	LU/258/16/PL	4						
Henry Adams	Littlehampton	Old Mead House	LU/258/16/PL	4						
Arun HCS	Littlehampton	Hawthorn Road	LU/77/19/PL	30				30		
Henry Adams	Littlehampton	Hawthorn Road	LU/77/19/PL	30				30		
Arun HCS	Middleton on sea	Yapton Road	M/45/16/PL	13				13		
Henry Adams	Middleton on sea	Yapton Road	M/45/16/PL	13				13		
Arun HCS	Pagham	Summer Lane	P/70/19/RES	90		16	56	18		
Henry Adams	Pagham	Summer Lane	P/70/19/RES	90		16	56	18		
Arun HCS	Pagham	Land north of Hook Lane	P/134/16/OUT	280				35	50	50
Henry Adams	Pagham	Land north of Hook Lane	P/134/16/OUT	280				35	50	50
Arun HCS	Pagham	Land north of Hook Lane	P/140/16/OUT	400				35	75	75
Henry Adams	Pagham	Land north of Hook Lane	P/140/16/OUT	400				35	75	75
Arun HCS	Pagham	South of Summer Lane	P/25/17/OUT	65						
Henry Adams	Pagham	South of Summer Lane	P/25/17/OUT	65						
Arun HCS	Rustington	Partlands	R/13/15/PL	33		20	13			
Henry Adams	Rustington	Partlands	R/13/15/PL	33		20	13			
Arun HCS	Rustington	Convolescent Home Sea	R/83/15/PL	7						
Henry Adams	Rustington	Convolescent Home Sea	R/83/15/PL	7						
Arun HCS	Rustington	70 Woodlands Ave	R/203/18/PL	5						
Henry Adams	Rustington	70 Woodlands Ave	R/203/18/PL	5						
Arun HCS	Rustington	The Street	WA/23/17/OUT	22						
Henry Adams	Rustington	The Street	WA/23/17/OUT	22						
Arun HCS	Walberton	Barnfield House	WA/95/19/RES	175		24	50	50	50	
Henry Adams	Walberton	Barnfield House	WA/95/19/RES	175		24	50	50	50	
Arun HCS	Walberton	East of Tye Lane	WA/22/15/OUT + WA/41	405		25	50	50	50	
Henry Adams	Walberton	East of Tye Lane	WA/22/15/OUT + WA/41	405		25	50	50	50	
Arun HCS	Walberton	Arundel Road	WA/63/19/PL	8						
Henry Adams	Walberton	Arundel Road	WA/63/19/PL	8						
Arun HCS	Walberton	Former Lanes End House	WA/26/18/OUT	6						
Henry Adams	Walberton	Former Lanes End House	WA/26/18/OUT	6						
Arun HCS	Walberton	Wandleys Farm	WA/76/17/PL	9						
Henry Adams	Walberton	Wandleys Farm	WA/76/17/PL	9						
Arun HCS	Walberton	Sunny Corner Copse	WA/75/17/PL	9						
Henry Adams	Walberton	Sunny Corner Copse	WA/75/17/PL	9						
Arun HCS	Yapton	East of Grove Lane	Y/92/17/OUT	300						
Henry Adams	Yapton	East of Grove Lane	Y/92/17/OUT	300						
Arun HCS	Yapton	Yapton C of E	Y/88/18/OUT + Y/71/20/	38						
Henry Adams	Yapton	Yapton C of E	Y/88/18/OUT + Y/71/20/	38						
Arun HCS	Yapton	Barnfield Road	Y/91/19/RES	205		54	51			
Henry Adams	Yapton	Barnfield Road	Y/91/19/RES	205		54	51			

Henry Adams	Yapton	Burndell Road	Y/98/18/RES	105	54	51		
Arun HCL	Yapton	Borham's Field	Y/63/19/RES	56			56	
Henry Adams	Yapton	Borham's Field	Y/63/19/RES	56			56	
Arun HCL	Yapton	South of Ford Lane	Y/86/16/OUT	109			80	10
Henry Adams	Yapton	South of Ford Lane	Y/86/16/OUT + Y/82/25/	109			50	50
Arun HCL	Yapton	Street Buildings	Y/49/17/OUT	45		45		
Henry Adams	Yapton	Street Buildings	Y/49/17/OUT	45		45		
Arun HCL	Yapton	Cinders Nursery	Y/4/19/RES	51	5	48		
Henry Adams	Yapton	Cinders Nursery	Y/4/19/RES	51	5	46		
Arun HCL	Yapton	South of end Cinders Nursery	Y/32/17/OUT	19		19		
Henry Adams	Yapton	South of end Cinders Nursery	Y/32/17/OUT	19		19		
Arun HCL	Yapton	Stakers Farm	Y/44/17/OUT	70		46	24	
Henry Adams	Yapton	Stakers Farm	Y/44/17/OUT	70		46	24	
Arun HCL	Yapton	East of North End Road	Y/48/18/PL	6	6			
Henry Adams	Yapton	East of North End Road	Y/48/18/PL	6				
Arun HCL	Yapton	Clays Farm	Y/83/19/OUT	33		33		
Henry Adams	Yapton	Clays Farm	Y/83/19/OUT	33		33		
Arun HCL	Yapton	Bilsham Road	Y/91/17/OUT	250			50	50
Henry Adams	Yapton	Bilsham Road	Y/91/17/OUT	250			50	50

Arun AMR 2021 - Appendix 4 sites

Arun HCL	Aldingbourne	Bridge and Old Cottage		27			27	
Henry Adams	Aldingbourne	Bridge and Old Cottage		27				
Arun HCL	Aldingbourne	Ryebeck Farmhouse		39		5	5	
Henry Adams	Aldingbourne	Ryebeck Farmhouse		39				
Arun HCL	Aldingbourne	Westgate Centre		160		50	50	60
Henry Adams	Aldingbourne	Westgate Centre		160				
Arun HCL	Aldingbourne	Westgate Street		250		250	50	50
Henry Adams	Aldingbourne	Westgate Street		250				
Arun HCL	Aldingbourne	East of Lidsey Road		425				
Henry Adams	Aldingbourne	East of Lidsey Road		425				
Arun HCL	Barnham and Eastergate	Berkstone House		17				
Henry Adams	Barnham and Eastergate	Berkstone House		17				
Arun HCL	Barnham and Eastergate	Bowdles		30			30	
Henry Adams	Barnham and Eastergate	Bowdles		30			30	
Arun HCL	Barnham and Eastergate	South of BEW		600				
Henry Adams	Barnham and Eastergate	South of BEW		600				
Arun HCL	Barnham and Eastergate	Fordingbridge		600		50	75	75
Henry Adams	Barnham and Eastergate	Fordingbridge		600				
Arun HCL	Barnham and Eastergate	BEW		1700			75	75
Henry Adams	Barnham and Eastergate	BEW		1700				
Arun HCL	Barnham and Eastergate	Little Warwick		7		7		
Henry Adams	Barnham and Eastergate	Little Warwick		7				
Arun HCL	Barnham and Eastergate	Kinnerley		7		7		
Henry Adams	Barnham and Eastergate	Kinnerley		7				
Arun HCL	Angmering	Worthing Rugby Club		250				50
Henry Adams	Angmering	Worthing Rugby Club		250				
Arun HCL	Angmering	Arundel Road and Dappers Lane		84		50	34	
Henry Adams	Angmering	Arundel Road and Dappers Lane		84				
Arun HCL	Bersted	Chalcroft Cottage		22		12		
Henry Adams	Bersted	Chalcroft Cottage		22				
Arun HCL	Bersted	New Barn Lane		2500		50	125	125
Henry Adams	Bersted	New Barn Lane		2500				
Arun HCL	Ford	Ford airfield		1500			75	125
Henry Adams	Ford	Ford airfield		1500				
Arun HCL	Littlehampton	West bank		1000				
Henry Adams	Littlehampton	West bank		1000				
Arun HCL	Pagham	West of Osbourne Refrigeration		55				25
Henry Adams	Pagham	West of Osbourne Refrigeration		55				

Arun AMR 2020 - Appendix 5 sites

Arun HCL	Aldingbourne	Garage Courts		12				
Henry Adams	Aldingbourne	Garage Courts		12				
Arun HCL	Angmering	St Denys Nursery		18				
Henry Adams	Angmering	St Denys Nursery		18				
Arun HCL	Angmering	Avenals Barn		30		10	10	
Henry Adams	Angmering	Avenals Barn		30		5		
Arun HCL	Arundel	Arundel Police Station		7				
Henry Adams	Arundel	Arundel Police Station		7				
Arun HCL	Barnham and Eastergate	Mahem Club		6				
Henry Adams	Barnham and Eastergate	Mahem Club		6				
Arun HCL	Bognor Regis	The beach (BR/244/20/PL)		10		10		
Henry Adams	Bognor Regis	The beach (BR/244/20/PL)		10		10		
Arun HCL	Bognor Regis	Covers		33				
Henry Adams	Bognor Regis	Covers		33				
Arun HCL	Bognor Regis	Gordon Avenue		11		11		
Henry Adams	Bognor Regis	Gordon Avenue		11				
Arun HCL	Ferring	Grange House		10				
Henry Adams	Ferring	Grange House		10				
Arun HCL	Ferring	144-148 Littlehampton Road		18				
Henry Adams	Ferring	144-148 Littlehampton Road		18				
Arun HCL	Littlehampton	St Martins Car Park		115				
Henry Adams	Littlehampton	St Martins Car Park		115				
Arun HCL	Littlehampton	Meadowfield		14				
Henry Adams	Littlehampton	Meadowfield		14				
Arun HCL	Middleton	Middleton Road		6				
Henry Adams	Middleton	Middleton Road		6				
Arun HCL	Pagham	St Ninians Church		9				
Henry Adams	Pagham	St Ninians Church		9				
Arun HCL	Rustington	Sussex Works		6		8		
Henry Adams	Rustington	Sussex Works		6				
Arun HCL	Rustington	Rushington House		25		10	15	
Henry Adams	Rustington	Rushington House		25				
Arun HCL	Rustington	Clock House		13			13	
Henry Adams	Rustington	Clock House		13				
Arun HCL	Widewater	Widewater House		10				

Henry Adams	Walberton	Dower House	10		
Arun HCS	Littlehampton	Littlehampton Academy	80	50	10
Henry Adams	Littlehampton	Littlehampton Academy	80	50	30
Arun AMR 2020 - Appendix 6 sites					
Arun HCS	Angmering	Chandlers BMW	20	20	
Henry Adams	Angmering	Chandlers BMW	20	20	
Arun HCS	Arundel	Blastreet	15		
Henry Adams	Arundel	Blastreet	15		
Arun HCS	Arundel	Stewards Rise	188		
Henry Adams	Arundel	Stewards Rise	188		
Arun HCS	Arundel	Greenhurst	9		
Henry Adams	Arundel	Greenhurst	9		
Arun HCS	Arundel	Electronic substation	37	37	
Henry Adams	Arundel	Electronic substation	37	37	
Arun HCS	Barnham and Eastergate	Collins Close	25		
Henry Adams	Barnham and Eastergate	Collins Close	25		
Arun HCS	Borsted	Bartons Infant School	20		20
Henry Adams	Borsted	Bartons Infant School	20		20
Arun HCS	Borsted	Testco express	5		
Henry Adams	Borsted	Testco express	5		
Arun HCS	Ferring	Henty Arms	14		
Henry Adams	Ferring	Henty Arms	14		
Arun HCS	Ferring	Ferringham Lane	26		
Henry Adams	Ferring	Ferringham Lane	26		
Arun HCS	Ferring	Village Hall	10		
Henry Adams	Ferring	Village Hall	10		
Arun HCS	Littlehampton	South of academy	70	40	30
Henry Adams	Littlehampton	South of academy	70	40	30
Arun HCS	Littlehampton	Potterton Wilson Road	18		
Henry Adams	Littlehampton	Potterton Wilson Road	18		
Arun HCS	Littlehampton	Hospital Site	15		
Henry Adams	Littlehampton	Hospital Site	15		
Arun HCS	Littlehampton	North of academy	130	50	80
Henry Adams	Littlehampton	North of academy	130	50	80
Arun HCS	Walberton	Woodacre	2		
Henry Adams	Walberton	Woodacre	2		
Arun HCS	Walberton	S & G Motors	27		
Henry Adams	Walberton	S & G Motors	27		