



Strategic Planning & Research Unit

For and on behalf of  
**Bedfordia**

Huntingdonshire Local Plan 2018  
Matter 12: Response to Council's  
"Note for the Inspector Regarding Other Sources of Housing Supply"

Prepared by  
**Strategic Planning Research Unit  
DLP Planning Limited**

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## INTRODUCTION

- 0.1 This further response has been prepared by the Strategic Planning and Research Unit (SPRU) of DLP Planning Ltd (DLP) on behalf of Bedfordia in response to the councils "Note for the Inspector Regarding Other Sources of Housing Supply within the District".

## MATTER 12- NOTE FOR THE INSPECTOR REGARDING OTHER SOURCES OF HOUSING SUPPLY

### Framework and PPG

- 1.1 The Framework (paragraph 47) requires that in order to boost significantly the supply of housing, local planning authorities should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- 1.2 We would submit that it is possible to identify sites for the full 15 year period and this is what the plan should do without recourse to windfall or other non-identified sites.
- 1.3 In comparison with what LPA's should do the policy on windfall in paragraph 48 only suggest that LPA's may make an allowance for windfall in relation to the calculation of the five year land supply (paragraph 48).
- 1.4 The Framework defines windfall as:  
*Windfall sites: Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.*
- 1.5 While the transition arrangements provide for this plan to be examined against the old framework this does not extend to the withdrawn PPG. It is the PPG rather than the Framework 2012 which in Paragraph 3-24 suggest that in interpreting the Framework 2012 statement that Local planning authorities have the ability to identify broad locations in years 6-15 that such an approach could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).
- 1.6 Again, even if this guidance remained relevant (which it does not as it is no longer available) then it only suggests a permissive approach to the use of windfall in the years 6 to 15 of a local plan, which must be read in conjunction with paragraph 47 of the framework which exhorts LPA's to identify sites to meet the whole of the need if it can. In this case the evidence is that there are sufficient potential sites that could be allocated to meet the need and as such there is no need to rely on such unidentified sites.
- 1.7 In any event the policy is clear that in the context of plans such an allowance should only be used from years 6 – 15. We would interpret this in the context of this plan as being from 2024 onwards not 2022 as calculated by this note.

### Windfall sites of 10 or more dwellings

- 1.8 The Housing land supply position statement August 2017 (paragraph 1.4) states that Small and windfall sites will be additional to this and provide flexibility for development in settlements across all levels of the development strategy. This approach if maintained would be in full accordance with the Framework 2012.
- 1.9 This approach would suggest that these late windfalls should not be added to the supply and hence reduce the overall level of housing requirement as their function is to provide additional flexibility.

### **Small sites of 1 to 9 dwellings**

1.10 The note states:

*“It is anticipated that once the Local Plan is adopted the number of windfall sites coming forward will significantly reduce.”*

1.11 Despite this assessment the note then goes on to calculate the average based upon the last 15 years (minus the highest and lowest 3 – table 2).

1.12 There would appear to be some double counting in that the trajectory already includes a small sites in the existing planning permission (1201890 & 1201891FUL 7 dwgs)

### **Prior approvals**

1.13 It is not considered that the definition of windfall extends to dwellings delivered by the Prior Notification approach.

1.14 Predicting future completions based on a limited time series has limited reliability but taking the median average of 38 and discounting this by 3% results in an estimate for this source of 37 dwellings per year.

1.15 This is an insufficient time frame to establish compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.

1.16 This is particularly the case given that this is a new yet finite source of supply and there is no evidence that it will or can provide a sustained level of future dwellings. There is a limited stock of building suitable for conversion in what is primarily a rural authority area.

### **Rural exceptions**

1.17 There is an element of double counting in that half the sites in table 5 (recently completed) are small sites and therefore are also counted as windfall. One of the 4 sites in table 6 is also a small site.

1.18 Like the evidence for prior approval sites these do not meet the definition of windfall. The evidence for such sites being a sustained source of new dwellings is less than compelling as it is based upon just 10 sites.

1.19 Notwithstanding this, the LPA record in delivering rural exceptions sites is very poor and there is evidence to suggest the 17 dpa delivered through rural exceptions between 2015 and 2018 is overstated for the following reason.

1.20 LPA propose an allowance of 45 dpa based on recent applications (therefore assumed to be permissions). Rural Exceptions Policy LP30 is proposed to be a key mechanism to address one of the major challenges of the plan – to address the affordable housing shortfall. However, rural exceptions (completions) have, according to the Council's paper, totalled 52 affordable homes through rural exceptions between 2015/16, 2016/17 and 2017/18 (three year average of 17dpa). If this is compared this to MHCLG Local authority housing statistics data returns for rural exception housing 2015/16, 2016/17 and 2017/18 these show that there have actually been just 35 affordable dwelling (averaging 11.6dpa) completions through rural exceptions in Huntingdonshire during this period. (source: <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2016-to-2017>).

1.21 Windfall allowances must be based on credible evidence. LPA expectations with regard to rural exceptions based on 'hope' rather than on a credible application of the previous supply data.

- 1.22 As such, suggestion that Policy LP30 will provide up to 45 dwellings (market and affordable together) is not credible or evidenced.
- 1.23 Council strategy to increase affordable housing supply is reliant on sites being available and being brought forward outside of the market, for which there is great uncertainty. Council suggest funding from the Combined Authority and a commitment by Luminus Group the largest housing provider in Huntingdonshire will transform delivery but are unable to demonstrate how. Large amounts of combined authority funding are ringfenced for Cambridge City (£70m) and other funding is to be split between the other Cambridgeshire authorities. Luminus have been providing affordable housing in Huntingdonshire since 2002, and therefore have presided over the current rates of delivery.
- 1.24 Four of the rural exception sites are for less than 10 dwellings and so might be considered to be 'small windfall sites.
- 1.25 There should be no allowance in the supply calculation for rural exception sites.

### **Conclusion**

- 1.26 It is not considered appropriate for there to be any off setting of the council's responsibility to allocate sites to meet the plan requirement in full. Identifying sites where it is possible (as it clearly is in this plan) is what plans should do. The reliance on windfall for the years 6 onwards is only something that councils may do their obligation to try and identify all sites must come first.
- 1.27 Large windfall sites, pre notification sites and rural exception sites are not correctly identified as windfall and furthermore the evidence that these sources will continue to deliver housing is not compelling being limited to a few years and a few sites.

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