

## Homework Item #1: Note on small sites windfalls and double counting for LSCs supply

1. In response to a query from the Inspector on day 1 of the Examination Hearings regarding development in the Local Service Centres (“LSCs”), this note is provided to clarify the small sites windfall allowance and supply at Local Service Centres.

### Background

2. ¶3.24-3.39 ED 05 ‘The provision of housing and employment land and the approach to spatial distribution’ identifies that included within the housing supply is a windfall allowance for small sites (9 dwellings or less, excluding residential gardens). The allowance was endorsed through the examination of the LPS and based on the average number of dwellings completed on those sites between 1 April 2009 and 31 March 2016 as shown in Table E.1 of the LPS [BD 01].
3. The allowance is applied within housing land supply forecasts from year 4 onwards to avoid double-counting with existing commitments, reflecting that planning permissions generally expire after 3 years from date of permission if they are not started/implemented. It is not disaggregated to settlements or tiers and consequently is not included as a component of supply specifically for the LSC tier.

¶E.7 of the LPS confirms that (at 31 March 2016) the small sites windfall allowance amounted to 1,375 dwellings (11 years x 125). The allowance rolls with the plan period, reducing by 125 dwellings annually. Appendix E: Housing Trajectory of the LPS [BD 01] shows how the windfall allowance was initially applied from 2019/20 (year 4) for the remaining 11 years of the plan period to avoid double counting with existing commitments in years 1-3.

4. The SADPD reflects the housing monitoring position at 31 March 2020. The Authority Monitoring Report [BD 04] includes an updated trajectory (Figure 12.2) which shows the remaining small sites windfall allowance applied from year 4 (23/24 onwards) of 875 dwellings (125 x 7 years) to avoid double counting with commitments.
5. Since the allowance was set in 2017, the average number of completions on sites meeting the small sites windfall criteria has risen. Table 8 of ED 05 shows that since the start of the plan period, delivery has averaged 177 dwellings per annum – exceeding the allowance of 125.

## Housing supply at LSCs

6. Housing supply of 3,210 dwellings at Local Service Centres (ED 05 Appendix 1) consists solely of:

<b>Supply source</b>	<b>Supply no.</b>
Completions since the start of the plan period	2,007 dwellings
Sites with planning permission	1,193 dwellings
Neighbourhood plan allocation	10 dwellings
Total	3,210 dwellings

7. Note the small sites windfall allowance is not included.
8. As set out in ED 05 ¶4.32 – 4.34, the housing supply of 3,210 dwellings is considered to lie “in the order of” the indicative figures for Local Service Centres. In deciding whether to allocate further sites for housing at LSCs, regard has been had to various factors including the performance of the small sites windfall allowance at LSCs.
9. ¶4.36 of ED 05 identifies that in the first 10 years of the plan period, 2,007 dwellings have now been completed at LSCs through sites not specifically identified in the development plan (windfall). Table 15 of ED 05 consequently identifies that 286 completions result from ‘small sites’ (24%) and the remaining 1,721 dwellings are windfalls on larger sites/sites that fall into the category of other windfalls (86%).
10. ¶4.40-4.42 of ED 05 highlights that delivery of 286 dwellings on small sites equates to an average of 27 dwellings per year and it is reasonable to assume that further windfall sites will come forward. If this average rate was to be applied to future supply (it currently is not) this could provide around 189 dwellings over the 7 final years of the plan period (as per the allowance methodology – the next 3 years from 2020 are excluded to avoid double counting existing commitments).

### Summary

11. To be clear, ED 05 includes reference to small sites windfall, simply to provide additional evidence regarding possible future windfall supply/delivery. It is not a ‘component’ of the 3,210 dwelling supply the council relies upon. There is no ‘double-counting’.
12. It is hoped that this addresses the Inspector’s query but the Council is happy to assist further with any additional questions that the Inspector may have.