

## Part B - Commenting on the Preferred Options

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet  of

Which document are you responding to?

e.g. Preferred Options (Booklet) Preferred Options (Full Version)

Which part of the document are you responding to?

Preferred Option Box (e.g. PO1)

Paragraph number / Heading / Subheading (if relevant)

Map (e.g. Preferred Development Sites – Whole District)

What is the nature of your representation?

Support

Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

Please see attached.

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Ref:

Rep. Ref.

## **Summary**

The windfall allowance is excessively high and there is little evidence that it will deliver the number of dwellings anticipated during the Plan period. The windfall allowance should be substantially reduced.

## **Discussion**

Paragraph 48 of the NPPF states that Councils may make an allowance for windfalls in their assessment of the five year housing land supply if there is compelling evidence that such sites have continuously come forward in the local area and will continue to do so in the future. Paragraph 7.20 of the Local Plan Preferred Options indicates that the Council is making an allowance for windfall sites during the Plan period, in line with the NPPF. Table 7.1 states that the allowance for the Plan period is 2,300, 128 per annum.

We accept that Warwick District has historically had high levels of housing development on windfall sites. It is therefore appropriate that an allowance of some sort is made. However there is little justification for the level proposed by Table 7.1, and explained in the 'Estimating a Windfall Allowance' (May 2012) background paper. The main concerns are as follows.

Whilst there has always been a commitment to redeveloping previously developed, or brownfield, land, it was not until 2000 and the publication of PPG3 Housing that the brownfield first policy was introduced, with the aim of developing 60% of all housing on previously developed land. There was a specific focus on the development of garden land, intensification (with minimum densities) and the reuse of land from other uses at high densities. This resulted, over the years which followed, in many sites being brought forward for development which might not previously have been considered. These were all windfalls. As such the number houses developed on windfall sites during the early 2000's was very high.

Since the introduction of Strategic Housing Land Availability Assessments in 2007 many of the larger windfall sites have been specifically identified and are now separately categorised in assessments of housing land supply. In addition the overall supply of windfall sites is diminishing as so many have now been developed.

The Council's assessment correctly recognises that changes in policy will affect the number of windfalls coming forward during the Plan period and some mathematical allowances have been made. However whilst changes have been made there is no justification for the levels proposed. Indeed we would argue that there should be greater deductions. Moreover no recognition has been given to the number of sites which have already come forward and thus an anticipated reduction in the future.

The Council's windfall figures for the last two years are significantly below the anticipated annual completion rate of 128 dwellings per annum. This is in part a result of the housing moratorium which operated in the District between 2005 and 2009, and more recently from the economic downturn. Whilst the moratorium has been lifted the economic downturn continues and the number of permissions issued on windfall sites reduced. Even if the number of permissions are not greatly reduced house building rates are. As a result the anticipated 128 dwellings is very unlikely in each of the next few years. The windfall allowance should be reduced to allow for this.

As a result of these comments the Council should provide a more justified assessment of likely windfalls in the coming years. The windfall allowance should be reduced, but we would welcome the opportunity to reassess the situation following reconsideration by the Council.