Reference 1185183
Thakeham Homes

Wealden Local Plan Examination
Matter 4 Supply of Housing
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Issue 1: Is the Council’s approach to its housing supply, justified, effective and consistent with national policy?

This statement has been prepared on by RPS Consulting Services Ltd, on behalf of Thakeham Homes.

58. Is reliance on the scale of windfall housing predicated within the LP being delivered, realistic, justified and consistent with national policy? In particular, how have the Core Areas been determined? How does the projected contribution from windfall housing compare with recent housing delivery? Is it appropriate to rely to such an extent on windfall housing rather than the allocation of housing sites within a plan led system?

1.1 RPS does not agree with the Council’s approach towards windfall development.

1.2 In terms of the context, the revised National Planning Policy Framework (NPPF) defines windfall sites as ‘sites not specifically identified in the development plan’, allowing for a wider range to come forward as compared with the 2012 definition ‘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’. A projected windfall completion total has been calculated at 2,516 units over the 15-year period to meet the proposed 14,228 figure for housing requirement.

1.3 Between 01 April 2014 and 31 March 2017, a total of 509 units were completed on Previously Developed Land (PDL) windfall sites. This equates to a percentage of 30.7% compared with the overall completions of 1,660 units over the same three-year period (A30 - Appendix 2). Based on the proposed supply 14,228, 17.7% of the requirement will come forward as windfall allowance. It is acknowledged that there has been strong windfall in the past, however little evidence has been presented by the Council that these same levels will be experienced in the future.

1.4 The key question here is whether the Council should be doing more now to allocate land for housing, rather than rely on a very high windfall allowance – particularly when parishes do not have any specific housing allocations within the supply. As an example, Crowborough is identified to have 360 dwellings come forward via windfall allowance, yet no allocations have been proposed. It is considered that this is not a suitable way for a plan-led approach as required within the (NPPF) paragraph 23 ‘strategic policies should provide a clear strategy for bringing sufficient land forward …. this should include planning for and allocating sufficient sites to deliver strategic priorities.’

1.5 RPS consider the proposed 2,516 units (averaging 168 units per annum) to come forward as windfall allowances is not a suitable suggestion for the purposes of the draft Local Plan, and leaves too much unplanned development. The Council should instead be planning positively for growth
as part of a more comprehensive set of allocations that are more capable of fulfilling the strategic objectives of the Plan, including delivering affordable housing.

1.6 The existing 2013 Core Strategy purposefully did not include windfall sites, recognising (as part of Paragraph 5.9) that:

“windfall sites can increase the demands on the District’s environmental and infrastructure constraints, and this in turn could have a determining effect on overall delivery capacity at any particular settlement”.

1.7 Although RPS accepts that windfalls will be likely to occur, the current proposals leave much to be desired and side-step the important process of allocating land for housing in the right places through the Plan.

1.8 RPS recommend the Local Plan should follow a plan led approach, rather than proposing windfall allowances for each parish, which will give greater certainty over delivery, and a better understanding of the impacts from the outset.