

APPENDIX 4

SADMP: Consideration of a ‘fall – back’ position in respect of planned housing delivery relating to HRA and flooding issues.

BCKLWN approach to how the housing delivery can be assured at the level required. In summary the BCKLWN will consider the contributions made by:

1. ‘Windfall’ development – which will continue to form part of the housing completions in the Borough and this should be acknowledged as such. It does not currently form part of the housing calculation in the plan.
2. The potential of some of our housing allocations detailed within the SADMP to accommodate additional dwellings beyond the number specified in the policy.

1. ‘Windfall’ Development

Windfall housing is any residential development that is granted consent on land or buildings not specifically allocated for residential development in the Local Plan, either the 1998 Local Plan or the SADMP. Windfall development takes place on unallocated land and continues to form a large part of housing completions within the Borough.

Allowances within the housing trajectory are made for windfall from large and small sites, this allowance is projected forward. Within the plan, up until now, windfall completions have been counted but future windfall completions have not been factored in. As illustrated below this source of housing makes a significant contribution to the overall number of dwellings that have completed over the plan period to date, and will continue to do so. Therefore this significant source of housing should be acknowledged within the plan as such.

The windfall allowance is based on compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. The allowances are realistic, taking account of historic windfall delivery rates and do not include residential gardens. This complies with the NPPF, paragraph 48.

Windfall Statistics:

- There were 3,958 completions from windfall sites between 2001 and 2014, out of a total of 8,093 completions, this equates to 49% of the total completions.
- 59% of the 3,958 windfall completions were derived from large (10 or more dwellings) windfall sites totalling, 2,327.

- 41% of the 3,958 windfall completions were derived from small (less than 10 dwellings) windfall sites, 1,631.
- On average windfall on large sites contributed 179 completions per annum between 2001 and 2014.
- On average windfall on small sites contributed 125 completions per annum over the same time period.

Recognising that there may be some reduction in the completion rate of windfall development in the future only 75% of the average completions per annum between 2001 and 2014 are used to project forward, this is known as the windfall allowance.

- This provides a large site windfall allowance of 134 dwellings p.a.
- A small site windfall allowance of 94 dwellings p.a.
- A total windfall allowance is 228 dwellings p.a.

Using this reduced windfall allowance over the remaining 12 years of the plan period, years since the publication date of the trajectory 2013/14, this would equate to a further 2,736 dwellings arising from windfall sites. The breakdown of this is 1,608 dwellings on large windfall sites and 1,128 dwellings on small windfall sites. The windfall rate will be recalculated each year, with the inclusion of another years' worth of completions from this source.

The stock of small site permissions is continually replenished and will be added to in the future as the Council adopts a new policy to allow infilling in the smaller villages and hamlets category of settlements within the hierarchy, Policy DM3 in the SADMP.

The approach with regard to the allocation of sites within the SADMP process, with the exception of King's Lynn, has been to allocate sites that are outside of settlement development boundaries. This will still allow large and small windfall sites to come forward within the development boundaries as the geographic area within the development boundary hasn't been reduced by allocations within the SADMP. Paragraph D.1.8 of the SADMP Pre-Submission document, Section D .1 distribution of development states *'it is important to note that not all of this planned growth will be delivered through site allocations. Part of the growth will be delivered on sites with existing planning permissions, and others will come forward on unallocated sites within development boundaries (especially within towns).'*

Following a court judgment showing the BCKLWN to have a lack of a five year housing land supply, there is the potential, at least in the short term, for an increased

number of dwelling to come forward on unallocated land including land outside of the development boundaries, providing the location is sustainable. This potentially could boost the windfall completion number above the windfall allowance, as this assumes that windfall development would mainly arise from unallocated land within the development boundaries.

2. The potential of some of our allocations to accommodate additional units beyond the number specified.

The Council's approach to the potential density of allocated sites is described in detail within the Council's statement 'Issue 3: The Broad Distribution of Housing (Section D.1)' section 3.3.

One of the main approaches to the density, of SADMP site allocations, was to ensure that there is enough space for the required number of dwellings to be provided and the associated infrastructure and other policy requirements to be realised on the allocated site. With the Strategic Sites there is a degree of uncertainty with regard to the location and exact space infrastructure such as a new link road or neighbourhood centre will occupy. Some sites may be capable of delivering the desired dwelling numbers that result in part of the site being undeveloped.

This undeveloped area could potentially be allocated in future plans, utilised in the review of the plan or a planning application could come forward that detailed higher numbers than the relevant policy, providing the proposed scheme was broadly compliant with the allocated site's policy within the SADMP, this may potentially be acceptable. This could result in an allocated site being developed and built out providing a higher number than stated with the SADMP policy for that site allocation.

Overleaf is a list of some of the sites that could have the potential to provide a higher number than the stated by the corresponding SADMP site policy. This is not to exclude the other sites, but to give an indication based upon comparing the desired model density and the SADMP modelled density.

It should be noted that any proposed development will need to ensure that it is acceptable in terms of normal planning requirements. It is not the intention to overload or overcrowd the viability.

Settlement	Site Ref	Dwelling Allocation	Gross Site Area (Ha)	Model Net Area (Ha)	Model Density (dw per Ha)	SADMP Modelled Density (dw per Ha)	Policy Overview
West Winch	Growth Area	1,600	171	128	39	13	new road, open space, neighbourhood centres, provision of space for future development
South Wootton	E3.1	300	40	30	39	10	Large area of Flood Zone constraints, recreational space, new road network, doctors site, school expansion land, SUDS
Knights Hill	E4.1	600	36.9	27.6	39	22	to blend in with the surrounding developments, new road
Downham Market	F1.3	250	16.2	12.2	36	20	landscape buffer, road network, GI , recreation space
	F1.4	140	13.9	10.4	36	14	new road network, landscaping, GI, recreational space
Wisbech Fringe	F3.1	550	25.3	18.9	36	29	road network, potential new school site, SUDS, public right of way enhancements
Docking	G30.1	20	3.4	2.55	24	8	Landscaping, pond retention, SUDS
Gayton	G41.1	23	2.8	2.1	24	11	Reflect the local settlement pattern
Heacham	G47.1	60	6	4.5	24	13	Recreation space, SUDS