

**Warwick District Local Plan
22nd May 2015**

Response to Inspectors questions on the post hearing notes provided by the Council (EXAM 19 and EXAM 20).

a) The Council's position is that it now anticipates completions from windfalls (including SHLAA sites) to total 175 annually from 2015/16 onwards. The position set out at the initial hearings and in the Matter 3 statement (see second sheet of App 3.3) was that completions from both of these sources combined would be 49 in 2015/16, 118 in 2016/17, 144 in 2017/18 and 147 in 2018/19. Can you explain the basis for this change?

- 1 The Council acknowledges that there has been some double-counting of windfalls completions with commitments for 2015/6 and 2016/17 - please see answer to question b) below for details. This explains a significant part of the change.
- 2 Taking the revised figures from question b) below the estimated windfalls for the first 5 years are as follows:
2015/16: 53 dwellings
2016/17: 123 dwellings
2017/18: 175 dwelling
2018/19: 175 dwellings
2019/20: 175 dwellings
- 3 The Table A below compares this with the figures in the Council's Matter 3 Statement, Appendix 3.3.

Table A: Comparison original and revised windfalls 2015-20

Year	Original Matter 3 Appendix	Revised Windfalls	Difference
2015/16	49 (49 windfalls +0 SHLAA)	53	+4
2016/17	118 (92+26)	123	+5
2017/18	144 (123+21)	175	+31
2018/19	147 (122+25)	175	+28
2019/20	183 (160+23)	175	-8
Total 5 years	641	701	+60

- 4 This shows that the difference between the original windfalls/SHLAA estimate is broadly in line with the revised windfalls estimate with a difference of 60 dwellings over the 5 year period. The Council considers that this is a very modest difference and to ensure consistency with the way windfalls have been estimated for the rest of the Plan Period, we would prefer to use the revised windfall figures.

- 5 The modest change in the figures is not surprising given that the basis for estimating windfalls has been adjusted as set out in Exam 20 (specifically para 16 and in para's 1, 2 tables A & B). As explained in EXAM20, the change was needed to address points raised during the Hearings with regard to potential double-counting with SHLAA sites. The small increase for the first 5 year period, has arisen due to the cautious approach the Council took to windfalls estimates in its original paper (DocH005) where sites over 5 dwellings were entirely discounted to avoid double-counting with the SHLAA sites (a discount that is not required for the approach set out in EXAM20). The evidence of recent completions (Table A and B of EXAM 20) and permissions (Para 13 of EXAM20) indicates that the revised estimate is more realistic. The NPPF makes the test on windfalls one of whether sites come forward over the 5 year period based on evidence of windfall trends (para 48). It should also be borne in mind that over the whole Plan Period, the revised approach substantially reduces the contribution that Windfalls will make to the Plan's overall housing supply.

*b) As I understand it the revised trajectory includes specific allowances for completions from **all** sites with planning permission as of 1/4/15. On this basis it would seem that none of the 175 dwellings forecast to be completed in 2015/16 under the windfall category had planning permission as of 1/4/15. Is this the case?*

If so it is unclear why App 2 to EXAM 20 shows 122 windfall completions in 2015/16 from sites which were granted planning permission in 2013/14 or 2014/15 and why it shows 52 windfall completions in 2016/17 from sites which were granted planning permission in 2014/15. Can you explain this?

- 6 Having reviewed Exam 20 Appendix 2 in light of this question, we find the two rows for 13/14 and 14/15 are simply an error and ask the inspector to consider the error removed from the table to avoid double-counting between some of the estimated windfall dwellings and commitments. Table 2 below is an extract from Appendix 2 of EXAM20. The number of dwellings in the three highlighted cells (totalling 174) should be removed.

Table 2: Extract from Windfalls Trajectory

Planning Permission date	No. of permissions	Date of Completion								
		11/12	12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20
2013/14		0	0	0	0	52	0	0	0	0
2014/15		0	0	0	0	70	52	0	0	0
2015/16	175	0	0	0	0	53	70	52	0	0
2016/17	175	0	0	0	0	0	53	70	52	0
2017/18	175	0	0	0	0	0	0	53	70	52

2018/19	175	0	0	0	0	0	0	0	53	70
2019/20	175	0	0	0	0	0	0	0	0	53

- 7 On this basis, the revised totals of estimated windfall completions for 2015-2020 are:

Year	2015/16	2016/17	2017/18	2018/19	2019/20
Estimated Completions	53	123	175	175	175

- 8 In total, that reduces the windfalls by 174 from 2450 over the plan period to 2276. Based on this Table 3.8 from the Council's Matter 3 Statement can be further updated as follows:

Table 3.8 (further revision)

Summary of housing supply	
Source of Supply	No. of Dwellings
Completions at 28/2/15	1,265
Planning Permissions at 31/3/2015	5,295
Small SHLAA Sites	0
Allowance for Windfalls	2,276
Consolidated employment land/canalside regeneration	200
Allocated sites	3,675
Total Supply	12,711

- 9 Having now addressed the double counting issue referred to in paragraph 6 above, the Council would strongly argue that EXAM20 provides a robust justification for an estimated windfall allowance that will provide 2276 dwellings over the Plan Period and 701 within the first 5 years. This is sufficient to maintain a 5 year supply of housing land on adoption of the Plan.

22/5/15