

OD05 Additional housing delivery information

The Inspector has requested additional information on the following information 5 questions at Matter 5 hearing on 20th September 2019. Each is answered in turn below.

1. Updated windfall allowance considering NPPF para 70

Table 1 below shows delivery from small sites (defined within the DLP as sites of less than 0.25ha) and represents more detailed analysis than provided within the Legacy Corporation's answer to question 5.2i. This shows on average 68 homes delivered per annum from conversions, changes of use or small sites under 0.25ha. However, this figure falls to 41 per annum when discounting the 'small sites' which were identified as having capacity within the 2013 London SHLAA, which therefore are not deemed to be 'windfalls' as such.

Table 1- Historical small sites/windfall rates					
	Conversion	Change of Use	Sites under 0.25ha	Total	Total minus 'identified' sites
2013/14	1	0	0	1	1
2014/15	0	2	0	2	2
2015/16	2	18	0	20	20
2016/17	114	35	12	161	161
2017/18	0	0	12	12	12
2018/19	4	35	172	211	51
Average	20	15	33	68	41

Taking into account paragraph 70 of the NPPF, any windfall assumption for first five years of the plan period should consider these trends. As shown above the conversion rate in 2016/17 was significantly higher, reflecting the change of use of a large block of live/work units to residential. This is not considered to be 'normal' supply, therefore a more accurate windfall rate would not include this figure, and amount to a total of 133, or 22 per annum. Therefore in the first 5 years of the plan period this would amount to 110 homes which has been added to Appendix 2 of the Local Plan, as set out within LD35. This is also the windfall allowance reflected in Table 3 below.

2. Number of consents, including large (over 10 dwellings)

Table 2 below shows a breakdown of the current permissions which have been included within the first five years of the plan period. This shows that a majority of the delivery anticipated comes from sites of over 10 units. It is anticipated that this figure will increase where schemes currently under determination are progressed to permission stage. Therefore at present this is a lower level estimation.

Table 2- First five year existing consents	
Permissions	2020/21-2024/25
Large (over 10 units)	8031
Small (under 10 units)	13
Total	8044

3. Estimated completion, or non-completion rate

The Legacy Corporation has a strong record of sites coming forward as anticipated. Of all schemes permitted by the Legacy Corporation for development of new homes since 2014, over 65 per cent have already been completed or are currently under construction and no permission has lapsed. This indicates a very high rate of all granted permissions being implemented, outperforming the London average, as identified within the Stock and Flow Planning Permissions and Housing Output January 2017 (Nathaniel Lichfield and Partners) which found that only around half of the total number of dwellings granted permission every year are built.

4. Effect of 5% buffer and whether should be factored in over the first 5 years, or over plan period as a whole

Table 3- Anticipated delivery against buffer requirements					
Year	Anticipated delivery	Including windfalls	Target	Target +5%	Target +20%
2020/21	1579	1601	2161	2269	2593
2021/22	2033	2055	2161	2269	2593
2022/23	2537	2559	2161	2269	2593
2023/24	2710	2732	2161	2269	2593
2024/25	2075	2097	2161	2269	2593

5-year total	10934	11044	10805	11345	12966
Difference-delivery v target	129	239		-301	-1922

5. Including any amount to take account of deficit, if applicable

As shown within Table 4 below the Legacy Corporation is expected to deliver 123% of the Adopted Local Plan housing target (of 1471 per annum) over the period prior to the adoption of the Revised Local Plan (2014/15 to 2019/20). Therefore a deficit does not need to be factored into the target.

Table 4- Delivery against the adopted Local Plan housing target			
Year	Target	Delivery	%
2014/15	1471	3769	256%
2015/16	1471	1076	74%
2016/17	1471	772	52%
2017/18	1471	1002	68%
2018/19	1471	1517	103%
2019/20 (forecast)	1471	1813	123%
Total	8826	9949	113%