

Mid Sussex Site Allocations DPD Examination (Matter 3)

Our ref 62525/01/MS/HBE
Date 13th May 2021
On behalf of Whitehall Homes LLP

Issue 3.5 Windfall Sites

This statement is prepared on behalf of Whitehall Homes LLP ('Whitehall'). Whitehall are promoting the 'Swallows Yard' site in Albourne (a Category 3 'Medium Sized Village') for a sustainable development of c.38 to 45 homes. This site is not currently proposed as an allocation in the submitted 'Site Allocations DPD'. Representations were previously made to the Regulation 19 consultation in September 2020 (Respondent ID: 1842). On the 28th April, a request was made to the PO for Whitehall to attend the hearing session on the 2nd June.

These representations have been prepared in accordance with the 'Inspector's Examination Guidance Note' (ID-03). Separate statements have therefore been prepared for each issue.

Is the reliance in the Plan on windfall sites [504 over the rest of the plan period] realistic?

- 1.1 Reviewing the 'Windfall Sites Update Note' (July 2020) (ref. H1) we consider that the revised allowance of 504 small site windfalls is justified and a realistic figure. It is likely that windfalls will continue to come forward given changes to permitted development rights and the continuation of Policy DP6.
- 1.2 However, the increased reliance of the plan on windfalls is unjustified. In summary:
- The Council can only meet its District minimum requirement because of the windfall allowance. Moreover, the relatively small 'oversupply' of homes (just 2.95% on the Council's figures or 1.52% on ours) to provide flexibility is entirely made of up the windfall allowance; so, the plan is reliant on unidentified sites to meet the minimum District requirement. This is not a positive or effective planning approach. Please see our response to Matter 3, Issue 3.1 (ii) for more detail;
 - The Council has not allocated sufficient sites to meet the minimum residual requirements for Category 3 settlements. To meet needs, these sites are reliant on windfall development. This is not a positive or effective planning approach; and
 - The Council has so far been largely reliant on windfall sites (both large and small), with 67.5% of all completions since the start of the plan-period being windfall development. Clearly more sites that can deliver in the short term need to be allocated now to ensure the effectiveness of the plan and to provide certainty to residents as to the location of development.

Word Count: 242