

# More welcome homes

Efforts to encourage urban regeneration are being undermined and rural land needlessly developed for new building because of a failure to take full account of the regular supply of sites for new housing in urban areas. This report draws on new research on housing land to show how straightforward changes to planning policy and practice can be made to shape the pattern of housing development for the benefit of both town and country.

**CPRE**



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This report is based on research undertaken for CPRE by David Tyldesley and Associates. CPRE is very grateful to all those local authorities who contributed to this project.

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## *Introduction*

Finding land for new housing development is one of the most important challenges faced by local authorities. In the face of huge building pressures, choosing the wrong locations for new housing or failing to control the rate of development can unnecessarily urbanise the countryside and undermine efforts to bring life back to run down areas of our towns and cities.

This report examines a key aspect of this debate - the supply of housing on sites which cannot be identified in advance by local planning authorities. Almost 10 years after CPRE first drew attention to the importance of these 'windfall sites' (*Welcome Homes* 1988) it draws on new and detailed research of local authority practice around the country and finds that the contribution made by this large and welcome supply of land in towns is being seriously underestimated. As a result, too much rural land is being earmarked for housing which is undermining urban regeneration efforts and damaging the countryside. Our recommendations for change to take better account of this source of land are relatively painless. If local authorities kept better records of new housing and national planning policies recognised the continuing large supply of housing on such sites we could go a long way towards better housing the nation and improving our towns and cities while protecting the countryside.

## *The search for housing land*

Local planning authorities need to ensure that enough land for new housing comes on stream to meet the requirements agreed in their development plan. This land comes from a number of sources (*see Box 1 over*). Housing is continually being developed so anything built since the plan came into force can be knocked off the total requirements immediately. In addition, a large amount of land is usually already earmarked for new building and has planning permission. Some new housing will also come from the conversion of existing housing and an allowance is made for this on the basis of past performance and future policy. A final vital source is from 'windfall sites' - sites which cannot be identified in advance. Where there is still a shortfall after all these sources have been added up, fresh land will be allocated, usually on greenfield sites.

## *What are windfall sites?*

Local authorities do not have crystal balls. Unsurprisingly it is impossible for planners to predict exactly what housing development is going to happen and where and so they can never know all the sites which will be developed in advance of an application for planning permission coming

### *Box 1: Calculating the supply of land for housing*

The way local authorities usually estimate how much land they need to release for housing development can be illustrated by taking the theoretical example of Golden Vale District which has a County Structure Plan housing requirement of 25,000 dwellings between 1991 and 2011. In drawing up plans in 1997 for new housing sites the local authority will make a calculation along the following lines:

Dwellings completed 1991-1997	8,000
Outstanding planning consents:	
(a) remaining capacity on sites under construction	3,000
(b) capacity on sites not yet started	3,250
Anticipated supply from conversions (1997-2011)	250
Anticipated supply from windfall sites (1997-2011)	3,000
<b>Total</b>	<b>17,500</b>

With a requirement for 25,000 dwellings it is therefore necessary for Golden Vale District to identify new land in its Local Plan for the development of 7,500 houses. Any addition to the windfall allowance would reduce this figure.

in. If a bus depot shuts down unexpectedly or an industrial site becomes vacant the land can provide an excellent location for new housing development but it will not be known about until it happens. Nor can local planners be expected to hunt out every small site which might just provide a few houses.

What can be predicted, however, is that such 'windfall sites' will continue to come forward. Even if the location cannot be predicted the fact is that thousands of new houses are and will continue to be built on windfall sites. And as can be seen from the illustration for Golden Vale District (*Box 1*) the assumptions which are made about windfall sites directly affect how much new, usually greenfield, land is earmarked for development in Local Plans.

The way windfall sites are calculated would not be so important if the amounts of housing they provide were relatively small. In fact they can be hugely significant. As the research shows over half of all new housing regularly comes from windfall sites in both urban and rural local authority areas. This makes the apparently esoteric issue of windfalls central to the debate over how best to plan new housing for the future in ways that do least environmental damage and encourage urban renewal.

## *How windfall sites are calculated - the official approach*

Government policy on housing land and windfall sites is set out in Planning Policy Guidance note 3 Housing (PPG3) published in March 1992. This requires local authorities to ensure that a five year supply of land for housing is available at the rates of development set out in development plans. In making this assessment local authorities can make an allowance for windfall sites. PPG3 recommends that:

- an allowance is made for small sites below 0.4 hectares which should be clearly justified and not over-estimated;
- a further allowance can be made for sites between 0.4 and 1 hectare based on past experience and evidence that they will emerge;
- no allowance should be made for sites above 1 hectare.

The Government's caution about the supply of housing on windfall sites and its warning to avoid over-estimates has been reflected in the approach of many local authorities. There is a widely held view that urban land is a finite resource and that the most likely prospects for housing development have already been identified. As a result it is increasingly common practice for development plans to assume a decrease in the supply of windfall sites and to discount past rates by 50-75%. More rural land has to be allocated as a consequence and opportunities for urban renewal are missed. This conflicts with the strengthening policy commitment to making the best use of urban land and raising the share of new housing in urban areas.

## *Underestimating windfall sites*

National planning policy is rightly keen to avoid overestimating future supply from windfall sites. What, however, are the likely effects of underestimating supply? These include:

- the needless allocation and consequent development of greenfield sites;
- a reduction in the rate of brownfield development which results from providing too many sites for developers who then cherry-pick greenfield sites at the expense of urban land;
- a reduction in the pressure to find previously unidentified sites, thereby turning discounted allowances for the future supply from windfall sites into self-fulfilling prophecies and overlooking potential to make better use of urban land;
- development plan housing requirements being overshoot as both windfall sites and freshly allocated greenfield sites are developed, thereby undermining the local authority development plan and the goodwill of those who contributed to its preparation.

If anything, it is better to overestimate than underestimate the contribution of windfall sites. It is easier to release more greenfield sites if too little housing is forthcoming from windfall sites than it is to undo development which has taken place on rural land which could have been avoided because more housing has come forward as windfalls than expected. This problem is further exacerbated by the lack of strong powers to phase and control the rate of development or to require builders to look towards brownfield sites before greenfield ones because of the wider benefits to improving the quality of life and the environment which urban regeneration can bring.

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## *Windfall sites in practice*

David Tyldesley and Associates undertook a questionnaire survey for CPRE of 50 local authorities (county, district and metropolitan borough) around the country to explore current practice and attitudes to windfall sites. The survey confirmed that windfall sites continue to make a very significant contribution to housing land supply. It focused on:

- the assumptions used by local authorities in making allowances for windfall sites and whether these were underestimating future provision;
- the monitoring of completions on windfall sites and whether accurate and usable records were being kept;
- how the issue of large windfall sites - which Government policy rules out of the calculations - is handled;
- the importance of windfalls in relation to plans which oversupply housing land in relation to development plan requirements.

A summary of the key results from the 24 authorities which provided meaningful responses is included in the Annex.

### *1. Assumptions*

Four local authorities fail to make any allowance at all for future contributions from windfall sites (Coventry, Fenland, Gedling, Hartlepool). These tend to be authorities whose plans already envisage a major over allocation of land above planned requirements and who are not under any pressure to demonstrate the existence of a 5 year land supply. The effect of not making an allowance further disguises the size of the real overprovision of supply. Two more authorities, Arun and Enfield, took account of the capacity of their areas to accommodate development on small sites and windfalls but their development plans made no explicit allowance for future windfall sites.

14 authorities did make an allowance and only 2 significantly overestimated the supply of windfall sites by comparison to what has actually happened - East Hertfordshire and Leicestershire. In East Hertfordshire's case the allowance only relates to small sites under 5 dwellings and so the windfall allowance is at the bottom of the range.

11 (80%) of the authorities making an allowance underestimated future supply from unidentified sites and 6 did so by more than 50%. Waverley made an allowance almost exactly in line with what has occurred in practice.

It should be noted that most of the allowances made by local authorities only address a part of the windfall supply. Only a few made an allowance for the full range of sites up to 1 hectare. Some authorities chose only small sites and conversions. Others just sites between 0.4ha and 1ha. In all these cases no allowance is made for the other elements of windfall supply

and the scale of underestimation is therefore much larger than Table 1 would suggest.

The survey also reveals flaws in the proposal put forward at many planning inquiries that the supply of windfall sites will decline once a development plan has been adopted. In 7 of the 14 authorities where comparable figures are available the supply of windfall sites increased after plan adoption. This is notwithstanding the fact that the calculations of windfall sites often included some of the boom years in the late 1980s when building rates were particularly high.

*Table 1 Contributions to housing supply per year from unidentified sites*

	Plan adopted	Rate pre-adoption	Assumed rate at adoption	Actual rate post-adoption
Arun	1993	578	No specific allowance	301
Broxtowe	1994	?	27	36 (+33%)
Burnley	1991	53	20	99 (+395%)
Coventry	1993	268	no allowance	246
East Hertfordshire	1994	82	105	62 (-41%)
Elmbridge	1993	115	86	90 (+5%)
Enfield	1994	456	no specific allowance	920
Fenland	1993	215	no allowance	136
Fylde	1994	116	40	187 (+468%)
Gedling	1990	?	no allowance	157
Guildford	1993	114	80	92 (+15%)
Hartlepool	1994	73	no allowance	114
Leicestershire	1994	?	975	770 (-21%)
Newcastle	Draft UDP	166	up to 125	N/A
Nuneaton	1993	?	42	125 (+197%)
Oldham	1996	446	140	N/A
Rossendale	1995	103	72	143 (+99%)
S. Cambridgeshire	1993	192	110	218 (+98%)
Tamworth	1995	?	61	85 (+39%)
Waverley	1993	369	190	182 (-4%)
Welwyn	1993	23	25	77 (+208%)

*Information for other local authorities is provided in the Annex*

*The conclusion is that local authorities are generally underestimating the supply of housing from windfall sites, often significantly, and consequently additional sites are needlessly being allocated for housing development and regeneration opportunities missed.*

## 2. Monitoring

One of the most worrying conclusions of the survey relates to the poor monitoring of windfalls and the inadequacy of local authority records. In our 1988 report *Welcome Homes* we highlighted 'an urgent need to improve the monitoring of the windfall aspect of housing land supply'. Yet large numbers of authorities still do not keep any records of windfall sites or cannot easily extract the basic information which is needed. Many have little accurate idea of the supply from windfall sites prior to adopting a development plan. And in a few cases records which were available were not being used or kept up-to-date because relevant staff posts had been frozen.

Even for those authorities which did provide more detailed responses it is clear that many gaps in their records exist and there is no widely shared definition of what constitutes a small, medium or large windfall site. Some authorities include conversions. Other do not. Some authorities check sites by regular visits. Others rely on building inspectors' records. And when some of the figures submitted to CPRE were investigated further errors were often found.

*The conclusion is that despite the importance of the windfall issue, the significant debates which occur during planning inquiries and the relatively detailed guidance provided by Government policy in PPG3, very few authorities maintain even quite basic information on the incidence of windfall sites.*

## 3. Large windfalls

Government policy in PPG3 specifically excludes local authorities from making an allowance for windfall sites over 1 hectare. It is suggested this might distract from efforts to identify sites when plans are prepared.

*Welcome Homes* showed that the supply from windfall sites did not depend on their size and that the supply from large sites was as historically reliable as that from small sites. This survey confirms these findings and the problems with current Government policy.

*Table 2 Housing supply from large windfall sites*

	Housing requirement	Housing requirement per year	Per year from large windfall since Plan adoption	% total required
Arun	6,500 in 15 yrs	433	85	20%
Burnley	1,900 in 10 yrs	190	20	11%
Coventry	5,434 in 13 yrs	418	64	15%
Fenland	9,220 in 11 yrs	838	21	3%
Guildford	2,068 in 8 yrs	259	8	3%
Hartlepool	3,650 in 10 yrs	365	47	13%
Hyndburn	3,524 in 15 yrs	235	25	10%
South Cambs	12,650 in 15 yrs	843	30	4%
Nuneaton	5,000 in 12 yrs	416	39	9%



Table 2 shows that where figures are available the supply of housing from large windfall sites is significant and can amount to 20% of total housing requirements.

The figures are all the more revealing when it is considered that the completions in these authorities have taken place in the first few years following plan adoption, when it might be expected that such completions would be at their lowest point. As Table 3 shows, in all the authorities except Hyndburn the supply from large windfall sites is likely to increase.

**Table 3 Existing capacity on large windfall sites**

Arun	495 dwellings
Burnley	130 dwellings
Fenland	126 dwellings
Guildford	133 dwellings
Hartlepool	215 dwellings
Hyndburn	30 dwellings
South Cambridgeshire	135 dwellings
Nuneaton	201 dwellings

*The conclusion is that the contribution from windfall sites over 1 hectare is highly significant and should be built in to the calculation of future land requirements if the needless allocation of new land is to be avoided and opportunities for urban regeneration undermined.*

#### **4. Oversupply**

A significant number of local authorities allocated more

land than necessary to meet development plan requirements for housing development. In the survey the following authorities chose to identify more than they needed to: Arun, Broxtowe, Coventry, Fenland, Gedling, Hartlepool and Newcastle upon Tyne. The effect of oversupplying land is to undermine the plan-led system and, in particular, strategies which seek to encourage better use of urban land. It also damages public confidence in the planning system when housing figures and sites agreed after consultation and discussion in development plans are seemingly set aside in the face of development pressures.

A further problem is experienced where local authorities with a large supply of building land choose not to examine the additional contribution which may be made from windfall sites. This simply obscures the true scale of oversupply and undermines the planning system. A number of authorities suggest there is no need to make an allowance for windfalls when there are large commitments because there is no need to 'prove' a five year land supply. This fundamentally misunderstands the potential contribution of windfall sites not just to meeting policy requirements for providing adequate land but in assisting wider policy objectives towards the better use of urban areas.

*The conclusion is that many authorities identify more land than is necessary for housing development even without taking full account of windfall sites. This contradicts the whole principle of managing development according to agreed plans and objectives which are drawn up after wide public consultation. Firmer action is needed to manage building rates and control the rate of release of land for development.*

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## *Recommendations*

In the light of these findings CPRE makes the following recommendations:

**Monitoring** - Good practice guidance should be prepared by the Local Government Association, in conjunction with the Planning Officers' Society and the National Planning Forum, on the monitoring of windfall sites and data collection according to an agreed set of definitions. This should include information on whether development is happening on greenfield or brownfield sites. Improved monitoring and data collection should be supported by the Government, including in planning guidance.

**Allowances** - Local planning authorities should make an allowance for future supply from unidentified sites in development plans. Government Regional Offices should register formal objections to plans which fail to do so. Allowances should be based on trends over the previous 10 years from all sites plus estimates of the effects of changing policies to increase the share of new housing in urban areas to aid urban regeneration efforts.

**Large sites** - The Government should revise national planning guidance to support local authorities making an allowance for windfall sites of all sizes. There is no justification for suggesting that local authorities should be able to identify all larger sites over one hectare in advance. Experience has shown that this is not the case and that if an allowance is not made the result is substantially to underestimate the supply of housing on such sites. This results in the needless allocation of rural land for building which undermines efforts to use brownfield sites more effectively.

**Policy support** - The Government should make other complementary changes to national planning policy. These include:

- phasing - to control the rate of development and allow land supply to be adjusted up or down in response to the contribution of windfall sites over the plan period;
- sequential approach - to require urban sites to be examined for new housing before the release of greenfield sites in order to provide a stimulus for urban regeneration;
- urban capacity studies - to explore the potential to increase the share of new building in urban areas, including by a review of existing policy constraints such as parking and density standards;
- removal of the five year land supply - to discourage the oversupply of building land which undermines efforts at urban renewal and threatens building rates in excess of planned requirements;
- strengthening the development plan - local authorities should be supported in refusing planning consent for development, even on allocated sites, where the contribution from windfall sites means that planned requirements are likely to be significantly exceeded.

**Public involvement** - Voluntary groups and parish councils should press local authorities to justify their approach to windfalls and ask searching questions about the collection of data and the assumptions which are used.

# Annex

## Case study details

**Arun** - The 1993 Local Plan makes no explicit allowance for windfall sites despite the excellent records kept by local authorities in West Sussex. Since 1988 windfall sites have contributed over 1,000 dwellings, many from sites over one hectare. The contribution from windfall sites has declined since the Plan was adopted because of the large number of unimplemented planning permissions. The supply from windfalls each year is as follows:

	Small sites & conversions	0.4 - 1 ha	1 ha	Total
Pre-adoption	467	53	58	578
Post-adoption	154	62	85	301

**Babergh** - No up to date information on windfall sites is available while a computer system is being installed. In 1992 future windfall sites were estimated to provide 460 dwellings 1991-2001. This has been exceeded in reality with 582 dwellings pa 1991-mid 1995.

**Bath & North East Somerset** - The 1996 Bath Local Plan estimates that nearly half of all development on large sites built since 1990 were on windfall sites over 0.5ha. The Wansdyke Local Plan assumes 64 dwellings pa from all windfall sites. 48 dwellings pa have been completed from sites under 0.5ha 1991-1995.

**Broxtowe** - Building rates in the first five years of the Local Plan have been in excess of planned requirements (433 dwellings pa by comparison with the 387 required). The Local Plan provides 3% more land than is required even before making any allowance for windfall sites over 0.5ha and on the basis of an allowance of 27 dwellings pa from small windfall sites - a rate which the Plan acknowledges is 'significantly less than actual recent rates'. In 1994-95 44 dwellings were completed on small windfall sites and in 1995-96 28 dwellings.

**Burnley** - The Burnley Local Plan significantly underestimates the contribution from windfall sites. It was adopted in 1991 and assumed 20 dwellings pa from all windfall sites. This contrasts with the 53 dwellings pa in the previous three years and the 99 dwellings pa which has been experienced 1992-96.

**Coventry** - The 1993 Coventry UDP makes no allowance for the contribution of windfall sites despite previous reports identifying that the city can expect significant numbers of completions from this source. 70% of the housing required between 1988 and 2001 was built by 1995 and in 1995 the capacity of the city was identified as being 276% above the planned requirement. The local authority's report on housing land states that this oversupply is 'accounted for primarily by the supply of windfall sites replenishing the housing land capacity almost as fast as sites are being developed'. The total contribution from windfall sites has been very significant - 99% of all completions in one year - and sites over one hectare have

been particularly important.

	90-91	91-92	92-93	93-94	94-95	95-96
Small sites & conversions	92	122	164	137	117	151
0.4 - 1 ha	36	33	38	3	33	105
> 1 ha	0	158	162	75	46	72
Total windfalls	128	313	364	215	196	328
Total for all sites	546	317	468	583	598	608
% supply from windfalls	23%	99%	78%	37%	32%	54%

**East Hertfordshire** - The 1993 Local Plan assumes small windfall sites will provide 105 dwellings pa. This is based on an historic record in which 143 dwellings pa were completed 1985-90 and 82pa 1987-92. Since 1993 the contribution from small sites has been below expected levels - 49 pa 1993/94; 98 pa 1994/95; 40 pa 1995/96. No allowance is made for larger windfall sites.

**Elmbridge** - The 1993 Local Plan provides for 68% more dwellings than the Structure Plan requirement and makes no allowance for conversions or windfall sites. 86 dwellings pa are assumed to be completed on sites of 9 dwellings or less. This was based on a record of 115 dwellings pa from such sites in the previous 5 years. Actual completions have closely followed the assumed trend with 90 dwellings pa 1993-96.

**Enfield** - The 1994 UDP made no allowance for windfall sites. The contribution has almost doubled from 456 to 920 dwellings pa since adoption of the Plan. Sites over one hectare are particularly important and contributed to 50% of the total supply from windfalls post-adoption. In January 1997 over 1,300 dwellings had planning consent on large windfall sites.

**Fenland** - The 1993 Local Plan makes no allowance for windfall sites and makes provision for 1,070 more dwellings than the Norfolk Structure Plan. It is suggested that no allowance need be made because of the large number of existing commitments. The contribution from windfalls has decreased since adoption of the Plan (from 215pa to 136pa) against this background of substantial over-provision.

**Fylde** - The 1994 Local Plan makes an allowance of 40 dwellings pa from all windfall sites. This is against a background of 116 dwellings pa for the previous five years just on small sites. Actual contributions in 1995 were 159 dwellings pa and in 1996 215 dwellings pa and at the end of 1996 there was already capacity for a further 158 dwellings on windfall sites.

**Gedling** - The 1990 Local Plan allocated 220 hectares of land for residential development 1976-96 which compares with the 160 hectares required by the Nottinghamshire Structure Plan. No allowance was made for windfall sites. Between 1988 and 1996 330 dwellings have been completed each year, of which nearly 50% of dwellings have been on windfall sites.

	1991	1992	1993	1994	1995	1996
Small sites & conversions	68	60	103	104	54	84
Windfalls > 0.5 ha	109	48	72	61	136	46
Total	172	108	175	165	190	130

**Guildford** - The 1993 Local Plan makes an assumption that 80 dwellings pa will be completed on small sites or from conversions. No other allowance is made. Although the contribution from windfall sites has reduced they are still twice the assumed rate of building when all sites are considered.

	Pre-adoption	Post-adoption
Small sites & conversions	114	92
Windfalls 0.4 - 1 ha	69	51
Windfalls > 1 ha	43	17
Total	226	160

**Hartlepool** - The 1994 Local Plan makes provision for at least 1,300 dwellings more than the requirements in the Structure Plan, primarily due to the allocation of one site for up to 2,000 dwellings. No allowance is made for windfall sites on the basis that it is not considered necessary in view of the extra land supply. In reality the contribution from windfall sites has been significant and is rising. Sites over one hectare currently contribute about 45% of all windfall contributions.

	Pre-adoption	Post-adoption
Small sites & conversions	38	58
Windfalls 0.4 - 1 ha	13	5
Windfalls > 1 ha	22	51
Total	73	114

**Leicestershire** - The 1994 Structure Plan does not include a figure for the allowance from windfalls but supports allowances being made by each district on the bases of past rates and future potential. The total contribution has declined from the 975 dwellings pa assumed by the districts to 770 dwellings pa in the first three years since adoption of the Plan, although there has been a significant fluctuation in the completion levels - 518pa 1993/94; 939 1994/95; 855 1995/96.

**Hyndburn** - The 1996 Local Plan makes an allowance for 40 dwellings pa from windfall sites - 17% of the total supply 1991-2006. Actual completions have stayed close to this assumption but only when sites over one hectare are included. Monitoring since 1996 has been stopped because of the freezing of the relevant staff post.

	1992	1993	1994	1995
Small sites & conversions	15	3	5	11
Windfalls 0.4 - 1 ha	0	0	9	23
Windfalls > 1 ha	25	26	32	22
Total windfalls	40	29	46	56
Total completions	240	177	256	366
% from windfall sites	17	16	18	15

**Newcastle** - The draft UDP makes provision for housing land significantly in excess of that required by Strategic Guidance when aggregated with the proposals in North Tyneside's UDP for the common housing area. The deposit UDP assumes 100 dwellings pa 1996-2006 despite records showing 166 completions each year 1988-95. Following a public inquiry a rate of 150 dwellings pa was recommended and Newcastle City Council are considering raising the figure to 125 dwellings pa. In 1995 there was already capacity for 522 dwellings on windfall sites.

**Nuneaton & Bedworth** - The 1993 Local Plan makes an allowance for 42 dwellings pa between 1989 and 2001. Actual contributions have been three times this rate during the first three years of the Plan.

	93-94	94-95	95-96
Small sites & conversions	60	35	66
Windfalls 0.4 - 1 ha	39	42	30
Windfalls > 1 ha	0	103	0
Total	99	180	96

**Oldham** - The 1996 UDP assumes only 140 dwellings pa from windfall sites up to 2001. This is 70% lower than actual supply 1991-96 when 446 dwellings were completed each year - 137 from small sites and conversions, 63 from medium windfalls and 256 from large windfalls.

**Rossendale** - The 1995 Local Plan assumes 72 dwellings pa from all windfall sites. Historic rates of completions were for 103 dwellings pa and in the one year since adoption 143 dwellings have been completed.

**South Cambridgeshire** - The 1993 Local Plan assumed the contribution of windfall sites would drop from 192 to 110 dwellings pa. In reality windfall sites have come on stream at much higher rates - 210 pa in 1993; 212pa in 1994 and 291pa in 1995. Overall, the supply from windfall sites before and after adoption of the Plan has remained steady and well in excess of the assumptions.

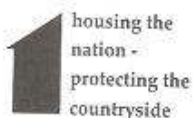
	Pre-adoption	Post-adoption
Small sites & conversions	114	119
Windfalls 0.4 - 1 ha	75	69
Windfalls > 1 ha	30	30
Total	219	218

**Tamworth** - The 1995 Local Plan makes an allowance for 40 dwellings pa from small sites and an allowance for a total of 150 dwellings on windfall sites between 1994 and 2001. In just one year - 1995/96 - 67 dwellings were completed on windfall sites and 43 on infill. The latest report on housing land indicates capacity for a further 273 dwellings on windfall sites and 103 dwellings on infill sites. This suggests that the supply from windfall sites will be well in excess of planned provision.

**Waverley** - The 1993 Local Plan makes an allowance for 997 dwellings on small sites and 1,100 dwellings on windfall sites of more than 10 dwellings between 1990 and 2001. Actual rates have been below these assumptions until recently, probably because they reflect estimates based on years of particularly high building rates. It is likely that the assumed rates will be met, not least because all the large sites with outstanding planning permission in 1996 were windfall sites, with a capacity of 392 dwellings. This compares to an assumed rate of development on large windfalls of 58 dwellings pa for the rest of the Plan period.

**Welwyn Hatfield** - The 1993 Local Plan assumes that on top of the large amount of land identified for housing development small windfall sites under 0.4ha need only provide 25 dwellings pa to meet the planned requirement of 5,300 dwellings 1981-96. The actual rate of supply from small sites has exceeded this and an additional large contribution has come from large sites over 0.4 hectares.

	93-94	94-95	95-96
Windfalls < 0.4	50	23	13
Windfalls 0.4 - 1 ha	7	38	101
Total	57	61	114



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