

Subject:	The Secretary of State's Proposed Changes to the South East Plan		
Date of Meeting:	16 October 2008		
Report of:	Director of Environment		
Contact Officer:	Name:	Mike Holford	Tel: 29-2501
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Key Decision:	Yes	Forward Plan No. CAB2392	
Wards Affected:	All		

FOR GENERAL RELEASE**1. SUMMARY AND POLICY CONTEXT:**

1.1 To inform the Cabinet on the Secretary of State's (SoS) Proposed Changes to the Draft South East Plan and to agree the City Council's response to those changes.

2. RECOMMENDATIONS:

2.1 That the Cabinet approves the following response to the South East Plan;

The City Council:-

i). Supports the need to demonstrate and employ best practice in design and construction for waste minimisation and recycling in Growth Points and Strategic Development Areas including Shoreham Harbour (policy W2).

ii). Welcomes the recognition that policy CC8 gives to the importance of green infrastructure, and the biodiversity, recreational, and cultural benefits it can help to deliver.

iii). Objects to policies RE2 and H2 as failing to give local authorities sufficient guidance in the preparation of their Local Development Documents.

iv). Objects to the housing provision figure for the City of 620 dwellings per annum as the Secretary of State has not demonstrated that this can be

accommodated in the City without adverse impact on the quality of life, the character of the urban environment and the economy. The high level of residential completions noted by the Secretary of State has been at the height of the housing market. Amongst other things, the City Council is looking to deliver housing that meets local needs, particularly family housing which is likely to reduce the number of units to be completed on relevant sites. The City Council asks the Secretary of State to take note of the findings Council's Strategic Housing Land Availability Assessment produced in-line with government guidance.

v). Is concerned that the emphasis on delivering housing numbers in the wider Shoreham Harbour Strategic Development Area could prejudice broader and longer term economic development objectives. The City Council believes that 10,000 units in the wider Harbour area is likely to be the absolute maximum achievable and that a more realistic figure is 5,000 to 6,000 dwellings to be able to develop a genuine mixed-use sustainable community. The City Council believes that the potential to deliver a significant number of jobs at the Harbour should be identified as part of the Strategic Development Area.

vi). Informs the Secretary of State that not all of the proposed Shoreham Harbour Strategic Development Area lies in Adur District, West Sussex but is also in Brighton & Hove and to provide the scale of development suggested by the Secretary of State will need to encompass a wider area than the operational port (see comments at point v). above).

vii). Requests that the City's housing provision figure is reduced to reflect that a significant proportion of the Shoreham Harbour Strategic Development Area lies within the City boundaries, as has been done for Adur District Council.

viii). Requests (in view of the points raised at iv to vii above) that the relevant housing provision figures are set at 10,400 (520 pa) for Brighton and Hove and a total of 6000 dwellings for the Shoreham Harbour Strategic Development Area.

ix). Requests that the Secretary of State clarifies that should the Shoreham Harbour Strategic Development Area not deliver the amount of housing ultimately indicated in the South East Plan, that the City Council and its partner authorities will not be required to make up this shortfall elsewhere.

x). Objects to policy W3. The methodology to apportion London's waste still does not adequately recognise the difficulties of providing sufficient landfill space to meeting's London need. For Brighton & Hove and East Sussex those difficulties mainly concern the large proportion of Areas of Outstanding Natural Beauty in the Plan area, the distance that waste would have to travel to reach any future landfill and the difficulty of moving that waste. These difficulties are reflected in that there is no historical disposal of London's waste in Brighton & Hove or East Sussex.

xi). Requests that should the Secretary of State not amend W3 in line with the City Council's objection (point ix. above), the City Council re-iterates the need for local testing of the apportionment on London's waste through Waste Development Frameworks to examine the practicalities of the approach.

3. RELEVANT BACKGROUND INFORMATION/CHRONOLOGY OF KEY EVENTS

3.1 The South East England Regional Assembly prepared a draft South East Plan between 2003 and 2006. The Assembly submitted this draft to Government on 31st March 2006. This was followed by a period of consultation.

3.2 An Independent panel of planning inspectors examined the draft South East Plan and comments made at an Examination in Public (November 2006 to March 2007), testing it for soundness.

3.3 Following publication of the panel's report in August 2007 the Government is now in the process of finalising the Plan. Legislation requires that after the Examination in Public the Government must publish and consult on any "proposed changes" it intends to make to the draft Plan. The South East Plan is now at this stage and a twelve week consultation period on the proposed changes ends on Friday, 24 October. Comments can only be made at this stage on the Secretary of State's (SoS's) proposed changes.

3.4 A summary of the SoS's main changes affecting Brighton & Hove are in Appendix A. The main areas needing comment are the overall development strategy for the South East, the housing provision for the City, the identification of Shoreham Harbour as a Strategic Development Area and the disposal of London's waste.

3.5 The Council's Core Strategy currently under preparation will need to reflect the emerging South East Plan.

Overall Development Strategy

3.6 The general thrust of *Policy RE1 – Contributing to the UK's long term competitiveness* is for Local Development Documents to be sufficiently flexible to respond to challenges in the global economy. No further guidance is given as to what this means in practice. This draft policy gives no certainty to local communities, local planning authorities and developers alike, as to what form of development will be supported and where, contrary to the Government's aims of a plan lead system.

3.7 In a significant change to previous policy, housing requirement figures set out in the SE Plan are now minimum targets, whereas they were previously maximum figures. Furthermore, in *Policy H2 - Managing the Delivery of the Regional Housing Provision* local authorities are requested to test higher levels of provision through their Local Development Documents to “plan for an upward trajectory of housing completions”. This would appear to undermine the whole basis of the Government’s aims for the new planning system since if there is no specific target it would appear difficult, amongst a number of things, for infrastructure providers to accurately plan for the future.

3.8 Policies RE1 and H2 are therefore contrary to the Government’s own advice for the South East Plan to provide clear guidance for Local Development Documents.

Housing Numbers

3.9 Two of the most significant changes to individual district housing provision figures proposed by the Secretary of State in the modifications to the South East Plan, concern Brighton & Hove. For a summary of the Secretary of State’s explanation for these changes see Appendix B.

i. 10,000 homes are proposed for a new Strategic Development Area (one of eight regionally) at Shoreham Harbour, which is identified as being in Adur District, West Sussex.

3.10 The proposed modifications make it clear that for Adur District any housing achieved above the quoted figure for Shoreham Harbour cannot be offset towards district figures elsewhere in the district. No such comment is made for Brighton and Hove. Importantly, the Secretary of State has reduced the housing provision for the rest of Adur District from 180 dwellings per annum to 105 per annum presumably as a result of the identification of Shoreham Harbour as a Strategic Development Area.

3.11 The Secretary of State should be asked to clarify that should Shoreham Harbour not deliver the number of homes ultimately identified in the South East Plan, the shortfall should not be required to be made up elsewhere.

ii. The overall housing provision for the City is increased to 620 dwellings per annum (dpa) or a total of 12,400 over the period 2006 - 2026. This represents an 8.8% increase over the Panel’s recommendation (12.7% over draft plan) of the housing figures for the City. The draft Plan figures were 550 dpa or a total of 11,000. The Panel recommended a modest increase of 20 dwellings per year (570 dpa or a total of 11,400).

3.12 The housing land supply factors quoted by the Secretary of State in favour of the increased provision are selective. For example, the Annual Monitoring Report 2006/07 housing trajectory figure of 875 dpa quoted is only for first 10 years of the plan period. Over 20 years the housing trajectory shows a more modest 660 dpa. However, this average of 660 dpa includes an allowance for 2000 dwellings at Shoreham Harbour. If these are removed the annual average becomes 560 dpa.

The housing trajectory figure also includes a significant allowance for unidentified or windfall sites. Revisions to Planning Policy Statement 3 - Housing, published in November 2006, require local authorities to provide robust evidence of genuine local circumstances that prevent specific sites being identified.

3.13 The Secretary of State quotes annual average residential completions for the City since 2001 of 698 dpa, This has been at the height of the housing boom. However, over the last 10 years the annual average is 598 dpa and in only three of the last 10 years has the City provided over 620 dwellings in one year. In the last year (2007/08) only 567 completions are recorded. In the next few years housing completions could be below even this figure.

3.14 Housing land supply figures in the revised preferred options Core Strategy do show projected annual average completions of 623 dpa. However, this figure is based on the interim findings of the Strategic Housing Land Availability Assessment (SHLAA) and cover only 15 years rather than the 20 years covered by the South East Plan. Revisions to the SHLAA now being finalised suggest an annual target in the region of 520 dpa to be an appropriate figure.

Shoreham Harbour

3.15 Shoreham Harbour has been identified as one of eight Strategic Development Area (SDA)s in the South East. The Secretary of State says an interim figure of 10,000 dwellings for Shoreham Harbour will be subject to detailed studies and assistance from the agencies as part of the strategic regeneration of the port. In the case of Adur District a footnote indicates that the housing figure for Shoreham Harbour is additional to the district figure. No similar indication is given for Brighton and Hove.

3.16 The City Council has long recognised the importance of the regeneration of Shoreham Harbour and has investigated the unlocking of this potential. Deliverability has always been a key concern particularly regarding transport and port consolidation/reclamation. However, the City Council has a concern over deliverability which is still, as yet, unresolved by the work undertaken by the South East England Development Agency (SEEDA).

3.17 The recent award of non-statutory Growth Point status to the Harbour is a related consideration. Notwithstanding, the importance given to re-generating the port area the City Council is concerned that the emphasis on delivering housing numbers implied by the Strategic Development Area (and Growth Point status), far from helping to resolve issues could have the opposite affect by focussing attention on the early delivery of housing. Such an approach would appear to be contrary to the stated aim in the South East Plan for the Sussex Coast which is regeneration.

3.18 The City Council believes, on the information currently available that 10,000 dwellings is the maximum that could be achieved in the Strategic Development Area and this would require the inclusion of a wider area than just the Port and leave little room for other uses. The City Council believes a figure of between 5 and 6,000 dwellings would be more appropriate as this would allow a significant number of jobs to be provided in the re-development.

3.19 The Secretary of State's proposed modifications do not make it clear that a sizeable proportion of the proposed Strategic Development Area based on the port lies within the boundaries of Brighton and Hove

Waste Planning

3.20 The Council has previously objected to policy *W3 - Regional Self-Sufficiency*, which includes a requirement to provide landfill capacity for an apportionment of London's waste. The Council objected on the basis that the approach did not adequately recognise the constraints of providing sufficient landfill space, and urged for greater self-sufficiency of London.

3.21 The Government has now proposed several modifications to *W3*. However, the Council should continue to object to this policy. The methodology to apportion London's waste still does not adequately recognise the difficulties of providing sufficient landfill space to meeting's London need. For Brighton & Hove and East Sussex those difficulties are mainly about the large proportion of Areas of Outstanding Natural Beauty in the Plan area, the distance that waste would have to travel to reach any future landfill and the difficulty of moving the waste. This is reflected in that there is no historical disposal of London's waste in Brighton & Hove or East Sussex.

3.22 The Examination Panel strongly supported the idea of the apportionment figures for London's waste being tested at the local level through Waste and Minerals Development Frameworks. The Government has not explicitly adopted this idea. The Council has commented on this issue at an earlier stage of the South East Plan and should re-iterate the need for local testing to examine the practicalities of the approach. This is especially so as the Government has accepted the advice of the Regional Assembly on the implications of the adoption of the Hampshire Minerals & Waste Core Strategy which identified that there were no suitable sites to

accommodate waste from London. Therefore, in the revised W3 the Government has removed Hampshire from the calculation of apportionment up to 2015 and re-allocated that volume to the remaining waste planning authorities, of which the Brighton & Hove and East Sussex proportion increases from 8.45% to 8.7% of London's exported waste for the period 2006-2015.

Policy CC8: Green Infrastructure

3.23 Policy CC8 of the proposed modifications is a new policy about the provision of green infrastructure. CC8 is also supported by amended wording in NRM4 (a policy that the Council welcomed in its last response) which acknowledges the wider benefits of green infrastructure.

3.24 The Council should support the inclusion of this new cross-cutting policy. The Council recognises the importance of green networks in the city and sees them as a valuable asset as illustrated by the preparation of the Brighton & Hove Green Network study which seeks to define a continuous network through the city for implementation through the LDF. As such the Council welcomes the recognition that CC8 gives to the importance of green infrastructure, and the biodiversity, recreational, and cultural benefits it can help to deliver.

3.25 The reference in CC8 to the importance of Green infrastructure in Strategic Development Areas, of which Shoreham Harbour is one, is also welcomed as an indicator that Strategic Development Areas should be sustainable in the broader sense and not just be about delivering housing.

W2: Sustainable design, construction and demolition

3.26 W2 has been amended to make specific reference to the need for Growth Points and Strategic Development Areas (Shoreham Harbour is both) to demonstrate and employ best practice in design and construction for waste minimisation and recycling.

3.27 It is recommended that the Council supports the amends to W2. The Council has previously objected to the weakness of policy references to sustainable construction in the South East Plan, so the amendment to W2 is particularly welcomed in the context of the high levels of housing development allocated for the City. Most development in the City will be on previously-developed sites so best practice in sustainable waste management at the demolition/construction stage, and designing buildings to facilitate re-use and recycling during operation, will both be significant in achieving the Council's sustainable waste management targets and wider policies for sustainable resource use.

4. CONSULTATION

Consultation with Economic Development, Housing Strategy and Transport has taken place and their comments incorporated in the report.

FINANCIAL & OTHER IMPLICATIONS

Financial Implications:

There are no direct financial implications arising from the recommendations contained within the report.

Financial Officer Consulted: Patrick Rice date 4 September 08

Legal Implications:

Local Development Framework and Local Development Documents have to reflect all these changes when confirmed.

Legal Officer Consulted: Ginika Ogidi date 9 September 08

Equalities Implications:

There are no direct equalities implications arising from the recommendations contained within the report.

Sustainability Implications:

A separate draft Sustainability Appraisal and Habitats Regulation Assessment report have been prepared as part of an ongoing technical process designed to inform the preparation of the South East Plan

Crime and Disorder Implications:

There are no direct crime and disorder implications arising from the recommendations contained within the report.

Risk and Opportunity Management Implications:

The Council's Local Development Framework Core Strategy must be in general conformity with the South East Plan once adopted or risk being found "unsound" by a planning inspector.

Corporate / Citywide Implications:

The South East Plan indicates the framework for overall development strategy for the City

6. EVALUATION OF ANY ALTERNATIVE OPTION(S):

- 6.1 The alternative would be to accept the SoS recommendations which officers believe would have a detrimental impact on the City and conflict with the City Council's priorities

7. REASONS FOR REPORT RECOMMENDATIONS

- 7.1 See 6.1 above

SUPPORTING DOCUMENTATION

Appendices:

A – Significant Changes to draft South East Plan proposed by the Secretary of State.

B - Identified Role of Brighton & Hove in the draft South East Plan and in relation to Shoreham Harbour/Housing numbers.

Documents in Members' Rooms

None

Background Documents

Government Office for the South East – The South East Plan – The Secretary of State's proposed Changes to the Draft Regional Spatial Strategy for the South East of England – Schedule of Changes and Reasoned Justification.

Government Office for the South East - The South East Plan – The Secretary of State's Proposed Changes to the draft Regional Spatial Strategy for the South East of England – Companion Document.

The South East Plan - Secretary of State's Proposed Changes – Summary prepared by the South East England Regional Assembly – July 2008

Significant Changes to the draft South East Plan proposed by the Secretary of State

Strategy

A new policy has been added to provide the focus within the 9 sub regions as growth and/or regeneration. Brighton & Hove is in the Sussex Coast sub-region where the focus is defined as regeneration.

Policy SP2 addresses the 22 Regional Hubs including Brighton & Hove. In addition to the roles for hubs identified in the draft SE Plan, the Secretary of State (SoS) is proposing to add:

Focusing new housing development and economic activity in locations close to or accessible by public transport to hubs; and

Delivering long term development as identified in Strategic Development Areas.

Eight Strategic Development Areas (SDAs) are also identified. Shoreham Harbour is identified as one of three new SDAs as the Government considers that the 3 areas may have capacity for levels of development in excess of 5,000 dwellings.

Cross-Cutting Policies

The Panel's recommendation that the policy on sustainable design and construction should encourage new housing development to seek the highest possible Code for Sustainability rating has not been accepted in the light of the Government's own national timetable for zero carbon homes.

The conditional approach (growth only taking place once infrastructure has been put in place) to development has been deleted. The new policy promotes a more proactive approach to funding including joint working, and the agreement of forward funding mechanisms between regional bodies and Government

A new policy on Green Infrastructure focuses on the provision of networks of multi-functional green space, particularly in regional hubs, special development areas and in area close to sites of international ecological importance.

Sustainable Economic Development

The SoS recommends a new policy to ensure that the regional economy contributes fully to the UK's long term competitiveness, and that local planning authorities will ensure that local development documents will be sufficiently flexible to respond positively to changes in the global economy and the changing economic needs of the region. This responds to the Panel's recommendation to include a stronger reference to the need to encourage and support international business activity.

Housing

Policy H1 sets out Regional Housing Provision 2006 – 2026. Local authorities are to facilitate delivery of at least 662,500 homes, or an average of 33,125 a year between 2006 to 2026. This compares to 640,000 (32,000 per year) in the Panel Report and 578,000 (28,900 per year) in the draft South East Plan. The increases are 4% above the Panel's recommendations and nearly 15% above the draft Plan.

Housing figures are minima. Local authorities are required to test the scope for maximising/accelerating the pace of development at strategic locations, identify additional sources of supply, test higher levels of provision through local development documents and plan for an upward trajectory of completions.

Most of the Panel's recommendations for individual districts have been accepted. Two of the most significant differences between the Proposed Changes and the Panel Report concern Brighton & Hove and are as follows:

10,000 homes at a new strategic Development Area at Shoreham Harbour which is identified as being in Adur District, West Sussex.

An 8.8% increase over Panel's recommendation (12.7% over plan) of the housing figures for the city.

Affordable housing targets are as set out in the draft Plan Policy H4 (25% social rented housing; 10% other forms of affordable housing). The proposed changes pick up the Panel's recommendation that a reference to lower site size thresholds be included in the policy.

The overall regional density target remains 40 dwellings per hectare.

There is a stronger emphasis on collaborative local authority working throughout the Housing Chapter, including in relation to Strategic Housing Market Assessment and sub-regional working.

Transport

In line with the Panel's recommendations, policy T3 particularly encourages the consideration of road charging in regional hubs. The supporting text indicates that Government now wishes to lead the debate on national road charging and is exploring technology for any future widespread system of road pricing.

Natural Resource Management

The SoS proposes amendments to policy NRM1 "water resources" including the replacement of the draft policy clause requiring high standards of water efficiency with a new clause stating that Local Development Documents should identify any circumstances where new development will need to have higher standards than Building Regulations. Another new clause directs development to areas where water supply can be guaranteed and calls for development to be phased with provision of supply.

Energy policies have been incorporated within the Natural Resources Chapter, updated to reflect PPS1 and a target of 10% of energy demand to be met from renewables for major developments has been included.

Waste and Minerals

The Panel's recommendation to update the sub-regional percentage apportionment figures for London waste imports in policy W3 "Regional Self Sufficiency" has been accepted.

Sussex Coast

A new clause is proposed for policy SCT1 "Core Strategy" providing for urban extensions in Arun, Chichester, Rother and Wealden Districts. Additional text has been added requiring the use of previously developed land (PDL) to be optimised, particularly in Brighton and Hove. Policy SCT2 remains unchanged.

Policy SCT3 "Management of Existing Employment Sites and Premises" now identifies strategic sites for employment development. In addition, a new clause is added to protect employment land in rural areas from other uses.

Policy SCT4 "Employment Priority in Land Allocations" now includes an emphasis on accessibility by rail. Clause (ii) has been deleted in line with the Panels recommendations and reference included to new employment allocations being included in sustainable urban extensions. Policy SCT5 "Education and Skills has been deleted.

Proposed policy SCT5 (was SCT7) focuses on housing distribution. The proposed housing level for the sub-region is 70,300, an increase of 18.4% on the figure recommended by the Panel. This reflects an increased allocation in Mid Sussex, Brighton & Hove and the inclusion of the Shoreham Harbour SDA (10,000 dwellings). The SoS recognises that studies have not yet been completed, and that this figure may be subject to change before the final RSS is published. However, the proposed changes are clear that if the development at the SDA exceeds 10,000 dwellings, this should not be offset against district requirements elsewhere.

Policy on “affordable Housing” (now SCT6) retains the 40% affordability target but removes the 15 dwelling threshold.

Draft policy SCT6 “Co-ordination, Leadership and Promotion of the Sub-Region” (now SCT7) is retained with minor amendments.

Policy SCT9 “infrastructure” is deleted and supporting text on Implementation and Delivery is proposed in its place. This identifies the key issues as being:

Waste water treatment
Making better use of the rail network
Mitigation of tidal flood risk; and
Improving workforce skills.

Identified Role of Brighton & Hove in the SE Plan and in relation to Shoreham Harbour/Housing numbers.

In the overall regional spatial strategy Brighton is identified as a regional hub by reason of it being a “primary regional centre” and “diamond for growth”.

Regional Hubs: The SE Plan states that local policies should support the development of regional hubs

by:

Giving priority to measures that increase the level of accessibility by public transport, walking and cycling;

Encouraging higher density land uses and/or mixed land uses that require a high level of accessibility so as to create “living centres”;

Giving priority to the development of high quality interchange facilities between all modes of transport;

Focussing new housing development and economic activity in locations close to or accessible by public transport to hubs;

Delivering long term development at identified Strategic Development Areas.

Shoreham Harbour: Shoreham Harbour is now identified as one of eight Strategic Development Areas.

The reasons given for identifying Shoreham Harbour as a Strategic Development Area are:

It is a unique regeneration opportunity within the Sussex Coast sub-region and has the potential to make a significant contribution to economic growth, regeneration and housing ambitions of a wider area;

It falls within the functioning economic area/travel to work area of Brighton and Hove that is recognised as a “diamond of (sic) growth” and a regional hub in both RES and draft RSS and, therefore, has the potential to both contribute to and to benefit from the significant economic growth potential of the Brighton & Hove diamond;

It provides a rare opportunity to diversify the economy of Adur and to provide high value jobs and employment opportunities that are less dependent on declining sectors thus increasing the long-term sustainability of its economy.

Realisation of the potential of this broad location depends on an intensive form of development and a critical mass where housing is allowed to play its full role in ensuring the economic viability of the development area.

It provides a unique opportunity for increasing the housing offer to meet the housing need and demand in the Sussex Coast area

Increased Housing Numbers:

The reasons given for increasing the housing numbers for Brighton & Hove are:

Brighton is the largest urban area in Sussex in population terms and is a Regional Economic Strategy economic diamond, a regional hub and a primary town centre.

As the Panel has recognised Brighton as a designated regional hub is a focus for investment in transport infrastructure. The Secretary of State wants to ensure that the strategy for Brighton and the surrounding area also take better account of the capacity of the existing rail network.

As one of only 8 regional economic diamonds there will also be focused action on promoting economic growth. SEEDA employment projections submitted during the EIP estimates a job growth of 910 per year over the first 10 years of the plan. Brighton's own Employment Land study that was carried out in 2005 estimates an annual job growth of 1130 for the same period. More significantly, it forecasts a strong upward trend in jobs growth and a much stronger growth in the second half of the plan period leading to an estimated 1,810 additional job pa.

The high demand for housing and the strength of the market and capacity of the district to respond positively to the challenge is emphasised by the housing completions that were nearly 150% of the Structure Plan requirement (averaging 698 for 2001/02 to 2006/2007). Moreover, the districts own housing trajectory projects a rate of 875 dpa for the 10 years to 2016.

The Secretary of State is of the view that a substantial reduction in the current level of housing provision will be a negative response to the vibrant housing market and the economy in the area. Unlike many parts of the sub-region, Brighton's demographic pressures would continue even without any net in-migration and that means an inadequate provision of housing would exacerbate the significant housing need problems in the area including the need to address the substantial backlog of housing as recognised by the Panel.

The Secretary of State considers that the recent announcement on Thames Link on B&H rapid transit schemes (sic) have added further impetus to the need for additional growth and the capacity of the area to support additional dwellings.

Glossary

Secretary of State - The Secretary of State for Communities and Local Government. The Government Minister responsible for publishing the modifications to the South East Plan on behalf of Central Government.

Growth Point - Government designation for areas proposing increased house building above previously agreed rates for which additional funds are available.

Strategic Development Area - Eight areas identified in the South East Plan for delivering long term housing development.

Local Development Documents - Collective term for a local authorities planning policy documents.

Core Strategy – A council's key policy document setting out the long term vision for development in an area.

Housing Trajectory – Graph showing predicted house building over the next twenty years.

Annual Monitoring Report – Document produced by all local planning authorities covering the previous financial year.

Unidentified/Windfall Sites – Sites which when receiving planning permission for housing have not already been identified in a planning policy document.

