

Appendix B:

Approach to dwelling estimates in the emerging Local Plan

1. This Appendix summarises how the dwelling estimates in the emerging new Local Plan have been calculated. It also shows that policies in the emerging Plan allow for planning applications to be brought forward with a dwelling number which is different from that set out in the emerging Plan.
2. The sites identified in the emerging Plan as proposed housing allocations are supported by a range of evidence. This includes the Council's [Strategic Housing Land Availability Assessment](#) (SHLAA).
3. Chapter 4 of the SHLAA explains the methodology. The full report should be referred to for further information. The calculation of potential housing numbers is based upon broad density assumptions; it is not the role of the SHLAA or Local Plan to generate detailed site layouts or schemes. An extract is set out below (note: dph = dwellings per hectare):

4.14 As such, it is necessary to re-assess site yields to ensure draft housing allocations in the plan are made on the most appropriate basis. An initial / indicative dwelling yield for each site was generated to inform subsequent analysis. This used an assumed density of between 20 and 35dph based upon site location, type and / or size. All density figures in this assessment are based upon gross site area:

- Infill development within existing town boundaries: 35dph
- Small extension to existing town (<5 hectares (ha)): 30dph
- Moderate extension to existing town (5 – 15 ha): 25dph
- Large extension to existing town (>15 ha): 20dph
- Land within or adjoining village: 20dph¹²

Assessing site suitability

4.15 The suitability of each site has been assessed, in the first instance, by desk-top studies to identify potential planning constraints against a consistent matrix. All sites have been visited by Council officers to check the findings of this exercise and make additional observations.

4.16 This process also allowed the initial dwelling assumptions to be tested on a site-by-site basis. Where higher or lower densities were considered appropriate, these were reflected in the final dwelling estimate for those sites which passed the SHLAA tests.

Source: Strategic Housing Land Availability Assessment (NHDC, 2016)

4. The new Local Plan recognises that the dwelling estimates are not the final word on the subject. Policy HS1 states that, on Local Housing Allocation sites, planning permission will be granted “provided that development **broadly accords** with the indicative number of homes shown” (emphasis added). The supporting text goes on to say:

8.3 An indicative number of homes is shown for each site based on our evidence⁸⁷. We will take a design-led approach to each site as schemes are brought forward. This may result in housing numbers changing in response to the pre-application and planning application process and our policy approach allows for development to fall within a reasonable range of our initial expectations.

5. Other policies in both the emerging Plan and the National Planning Policy Framework provide a basis on which to consider the appropriateness of individual planning applications against the dwelling estimates in the Plan. These include (but are not necessarily limited to) policies which advise upon detailed matters such as design, heritage and open space.
6. In practice, it is highly unlikely that all schemes brought forward will conform precisely to the dwelling estimates in the emerging Plan. As can be seen from the extracts above, the estimates from the SHLAA are based upon densities set at 5dph intervals using five broad typologies of site. Upon detailed analysis it may be found that schemes do not conform precisely to these categorisations and can support higher, or only lower, numbers of homes.
7. Based upon the wording of the relevant policies and supporting text, it is Officers' professional view that a 'standalone' refusal of a planning application against Policy HS1 based solely on the number of homes proposed in a scheme would be unlikely to be sustained at a Planning Appeal. If decision-makers are of the view that a scheme proposes too many or too few homes upon a site, any reason(s) for refusal would need to identify the planning harm by reference to other relevant national or local policies.

Site LS1

8. Site LS1 was assessed in the SHLAA as 'land within or adjoining a village'. This means an initial assumption of 20dph was used. This generated an initial estimate for the site of 141 homes. The commentary in the SHLAA says:

"Site adjoins Lower Stondon (Central Beds) and could provide extension to this settlement. Site is flat and well-defined. Area of flood risk along northern edge of site and this would need to be excluded unless a sequential test was undertaken. This would create a gap from existing development and any scheme would need to ensure permeability and integration. Listed buildings to east would require a sensitive buffer and further consideration of likely heritage impact. Dwelling estimate reduced to take account of these factors and based upon assumption that land in flood zones would not be developed."

9. A refined dwelling estimate of 120 units is shown. This effectively assumes that approximately one hectare of the site would not be developed with a density of 20dph applied to an assumed developable site area of 6 hectares.