INDEPENDENT EXAMINATION OF THE SUFFOLK COASTAL LOCAL PLAN

MATTER 2A STATEMENT

ON BEHALF OF PERSIMMON HOMES (SUFFOLK)

AND CHRISTCHURCH PROPERTY COMPANY LTD
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1. INTRODUCTION

1.1 This statement has been prepared by Pegasus Group on behalf of Persimmon Homes Suffolk (hereafter referred to as ‘Persimmon’) who has land interests within Suffolk Coastal District. This statement has also been prepared on behalf of Christchurch Property Company Ltd, whom Pegasus Group is representing solely in relation to Matter 2A.

1.2 This statement provides a response to Matter 2A: The Suffolk Coastal Spatial Strategy – Housing Provision and should be read in conjunction with representations submitted to the Draft Submission Local Plan [CD-A1] in February 2019. Persimmon’s interest relates to land off Bell Lane, south of Kesgrave, which forms part of a wider site referred to as ‘Site 520’ in the Council’s evidence base.

1.3 Christchurch Property Company Ltd is to be represented at the hearing sessions by Richard Brown Planning in relation to Question 2.5, the needs of older people.
2. **MATTER 2A: HOUSING PROVISION**

**Issue: Is the overall strategy and provision for housing development effective and justified?**

**Calculating the housing need**

**Question 2.1:** The PPG specifically advises that the 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes (Paragraph: 005 Reference ID: 2a-005-20190220). The Council’s response to my initial questions, calculates the figure of 542 homes per annum needed on this basis, using the latest published affordability ratio. Is this figure justified as the minimum number of homes needed in the Plan area on an annualised basis?

2.1 While a housing target of 542 dwellings per annum (dpa) is consistent with the current PPG, we are supportive of the Council in its utilisation of the 2016-based household projections, providing a minimum housing requirement of 582 dpa across the plan period.

2.2 Suffolk Coastal is different to many parts of the country in that the 2016-based household projections suggest higher levels of household growth compared with the 2014-based projections. This corresponds with the most recent 2016-based population projections showing a faster rate of growth in the number of people living in the District, which in turn leads to a higher rate of household formation in the 2016-based household projections. The increased rate of growth projected in the more recent population projections compared to the 2014-based data set is quantified between 2019 and 2029 as a difference of around 1,700 more people (an increase of 5,900 people in Suffolk Coastal in the 2016-based population projections, as opposed to 4,200 with the 2014-based figures).

2.3 Going with the lower figure of 542 dpa risks not taking into the trend of increased household formation in Suffolk Coastal, and therefore underestimating the minimum level of housing need in the District. Remaining with the higher minimum housing target also makes sense for a number of other reasons, notably:
• **Affordability ratios vs household formation:** Affordability in Suffolk Coastal is getting worse. As noted by the Council in its response to the Inspector’s initial questions in May 2019, the median affordability ratio in the District is now 10.07. This relates to 2018 and compares with 9.07 in 2017 and 8.35 in 2016. While the 542 dpa figure takes into account the latest affordability ratio for 2018, it does not factor in the point above regarding increased household formation in the District. This means that even though it adjusts for housing need based on the increased affordability issues, it fails to account for the upward trend in the number of new homes being formed which is picked up by the 2016-based household projections. Starting with a lower minimum annual housing need figure is likely to exacerbate the affordability problem, therefore the 582 dpa target should remain as the minimum housing need figure for Suffolk Coastal. If it isn’t, the affordability issues already facing the District could get significantly worse.

• **Affordable housing delivery:** Staying with the issue of affordability, Suffolk Coastal published its most recent Authority Monitoring Report (AMR) in March 2019. Table 5 in this document indicates that in 2017/18 there were 99 gross affordable housing completions in the District, down from 139 in 2016/17 and 101 in 2015/16. The 99 gross affordable homes delivered in 2017/18 equated to 17% of all completions (582). As noted by the AMR, this falls below the Core Strategy requirement of 24% (paragraph 3.57). It is hard to see how the District is going to increase its rate of affordable housing delivery by having a lower annual target for total homes. There is also the impact of Right to Buy to consider, which is substantially reducing net gains with respect to affordable housing. This means the gross figure of 99 for 2017/18 is likely to be lower when it is netted off to allow for this.

• **Net additions:** Data sourced from the Ministry of Housing, Communities & Local Government show that annual net completions in Suffolk Coastal have surpassed 500 on an annual basis since 2015/16. This has coincided with relatively high levels of internal and international migration, indicating substantial demand for new housing
in Suffolk Coastal from people wanting to move into the area. Of particular significance is the fact that there were 582 net additional housing completions in the District in 2017/18, which is exactly the same as the minimum target identified by the Council using the 2016-based household projections. This demonstrates that a target of 542 new homes per annum can be surpassed, suggesting that the starting point for Suffolk Coastal should be more ambitious – i.e. use the 2016-based projections as the baseline position. Net additions in 2015/16 (564) and 2016/17 (550) also surpassed the 542 dpa target.

**Question 2.2:** What implications (direct and consequential) for the Plan would arise from the use of a housing need figure derived using the 2014 based household projections?

2.4 One of the main implications has already been noted above, in that using the 2014-based household projections risks not taking into account the trend of increased household formation that is picked up by the 2016-based projections. Underestimating the level of housing need in an already constrained market will have serious long-term implications for the Suffolk Coastal economy.

2.5 PPG (Paragraph: 010 Reference ID: 2a-010-20190220) provides examples of where it may be appropriate to plan for growth above the housing need figure indicated by the standard method. This includes: areas where targeted growth strategies exist; strategic infrastructure improvements are likely to drive an increase in housing need; and where an authority had agreed to take on unmet need from a neighbouring authority. It is considered that all of the above are applicable to Suffolk Coastal and further evidence for this conclusion is provided below.

2.6 It is important to re-iterate that the standard method identifies the *minimum* number of homes to be planned. It does not consider the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Regardless of whether the housing need figure is derived by applying the 2014-based or 2016-based housing projections to the standard method, a range of other factors need to be accounted for when calculating the annual housing need figure.
• **Economic development policy:** Any housing need figure for Suffolk Coastal needs to consider economic development objectives in documents such as the 2017 East Norfolk and Suffolk Economic Strategy (published by the New Anglia LEP in November 2017). One of the aims of the East Norfolk and Suffolk Economic Strategy is to see the creation of 88,000 net new jobs by 2036. Table 2.3 of the Final Draft Local Plan states that baseline jobs growth in Suffolk Coastal is forecast to be 6,500 from 2018-36. It is unclear as to whether the baseline jobs growth forecast takes account of the employment target outlined in the LEP's Economic Strategy. Reference is made to the Strategy in the Local Plan (paragraph 12.1.08), however it does not mention the 88,000 jobs target for the LEP area. The impact of this growth on Suffolk Coastal District's labour market and the subsequent demand for housing needs to be analysed. As it stands, deriving a housing need figure from the household projections does not do this.

• **Jobs growth:** Analysis of data from the Business Register & Employment Survey (published by the Office for National Statistics) shows that from 2015-17, employment in Suffolk Coastal remained flat at 53,000. Job numbers in the Ipswich Housing Market Area were around 199,000 in 2017 – increasing by 4,000 (1.0% per annum) since 2015. Ipswich and Mid Suffolk were the drivers of this growth. The impact of these trends since 2015 is that Suffolk Coastal's share of jobs in the HMA has reduced from 27.1% in 2015 to 26.6% in 2017. The aim for the District should be to reverse this trend and to do that, it will need to attract people of working age to the area, otherwise it will become increasingly reliant on importing labour from other districts. Over the last decade population growth in the District has been entirely driven by an increase in people aged 65+. This makes it vital for Suffolk Coastal to have a housing offer that is attractive and affordable to people who are economically active. Factoring issues such as this into the Local Plan requirements is likely to lead to higher annual housing requirements, rather than simply basing them on household projections.

• **Ageing population:** As noted above, over the last decade population growth in the District has been entirely driven by an increase in people aged 65+. The reps submitted as part of the Reg 19 consultation note that this cohort grew by 6,400 between 2007 and 2017, while the number of people aged 0-15 and 16-64 declined by 500 and 1,200 respectively. These cohorts form the basis of current and future labour supply. The fact that they have both
declined (a trend which is projected to continue) further emphasises the need to deliver a housing offer that is attractive and affordable to people who are economically active. An uplifted housing requirement to reflect this would help in addressing the increasing affordability issues within the District, as well as an aging population. The provision of a greater number of homes would reduce affordability disparities and help in attracting younger people and families to Suffolk Coastal.

**Question 2.3:** The Plan seeks to provide for a contingency above the minimum housing need requirement. What is the overall provision for contingency (including the windfall allowance and contributions from Neighbourhood Plans) proposed and is it justified?

2.7 The Final Draft Local Plan provides a contingency of 8.5% above the standard method based on the 582 dpa target, which increases to 16.5% when the 542 dpa target is used. Paragraph 73 of the NPPF states the following:

"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

5% to ensure choice and competition in the market for land; or

10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or"
20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”

According to the SCDC’s 2018 AMR, housing delivery within the District over the last three years has ranged between 72% and 85%. This puts it on the edge of the 20% buffer. If the 542 dpa target is used, the contingency of 16.5% may need to be increased slightly. However, given it is argued that the minimum target of 582 dpa is more realistic for Suffolk Coastal, the contingency would need to be increased substantially above its current level of 8.5%.

2.8 The Council Response to Inspectors Questions – H1 (16/05/19) identifies a supply of specific sites to provide 10,900 homes (excluding windfall) over the plan period. This compares with the identified minimum housing requirement for 10,476 homes, and so provides a contingency of 4% assuming the trajectory of the Council is achieved.

2.9 It is appropriate to plan for a contingency to ensure that the minimum housing needs are met, allow for the inevitable non-delivery of a certain proportion of sites, and provide sufficient flexibility to respond to change in accordance with paragraph 11a of the NPPF.

2.10 Different Inspectors have approached this in different ways. For example, in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy examination and the Vale of Aylesbury Local Plan, the Inspectors requested that the housing requirement was uplifted by 5% and 5.2% respectively to provide sufficient contingency. In both instances, this then also required an uplift in the supply to meet the minimum housing requirement. This approach also had the advantage of maintaining contingency throughout the plan period as a result of the five-year land supply being assessed against the housing requirement.

Scale and location of growth

Question 2.4: Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.11 Policy SCLP2.1 identifies that Suffolk Coastal will contribute to the collective delivery of at least 37,328 homes across the Housing Market Area. This will be
achieved through the delivery of at "least 10,476 homes within Suffolk Coastal to meet the identified needs of the LPA, as set out in Policy SCLP3.1, but in order to meet the needs across the Housing Market Area it may be necessary to deliver additional housing to address any unmet needs across the remainder of the Housing Market Area which arise across the plan period. This accords with paragraph 35a of the NPPF which requires that the Local Plan provides:

“...a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated...” (our emphasis)

2.12 Policy SCLP2.1 identifies that the delivery of development will be jointly monitored across the Housing Market Area. However, in order to be effective in meeting any shortfalls in a timely fashion and provide a clear strategy to bring forward sufficient land over the plan-period, in accordance with paragraph 23 of the NPPF, Policy SCLP2.1 needs to identify the mechanisms to achieve this.

**Housing needs**

**Question 2.5:** Does the Plan adequately address the needs of different groups in the community as set out in paragraph 61 of the Framework?

**Those in need of affordable housing**

2.13 Table 4.3f of the Strategic Housing Market Assessment Partial Part 2 update, January 2019 (SHMA19) identifies that 72.4% of the housing need over the plan period is within the owner-occupied sector and an additional 10.3% is within the private rental sector. However, it then identifies that of the housing need of 880 homes within the private rental sector, 390 should be met through discounted home ownership. This leaves 490, or 5.8% of the need arising within the private rental sector.

2.14 Therefore, the evidence within the SHMA19 identifies that there is a need for 78.2% of housing to be provided as market housing (either to meet the needs of owner-occupiers or private renters). This leaves a need for 21.8% of the housing to be provided as affordable housing over the remainder of the plan period.
2.15 Policy SCLP5.10 however identifies a requirement for 1 in 3 homes to be provided as affordable housing. This places an unjustified burden on the provision of the required market housing.

2.16 The over-delivery of affordable housing is likely to have a number of unsustainable effects including:

- it will reduce the number of market homes delivered such that the need for market accommodation may not be met;
- as it exceeds the identified need for affordable housing, it is likely to result in vacant or unlettable affordable homes;
- the provision of affordable housing has implications for the viability of housing developments, such that the residual market housing will need to be sold at a premium.

2.17 Therefore, whilst the proposed level of affordable delivery will more than meet the needs of those who qualify for affordable housing, it will have adverse implications on the affordability of housing for those who do not qualify.

2.18 Similarly, SCLP5.10 seeks 50% rental, 25% intermediate and 25% discounted home ownership homes. This compares to the need identified in Table 4.3f of the SHMA19 for 46.9% rental\(^1\), 32.1% intermediate\(^2\) and 21% discounted home ownership\(^3\). The discrepancies in this policy are not justified and will not be effective in meeting the actual need.

**The supply of housing and housing trajectory**

**Question 2.6:** Will there be a five-year supply of deliverable housing sites on adoption of the Plan?

**NPPF Paragraph 74**

2.19 Paragraph 74 of the NPPF identifies that the five-year land supply position will be protected where it has been established in a recently adopted plan. The PPG (68-
010) identifies that when an LPA wishes to protect its five-year land supply through a recently adopted plan, they will need to have made this clear to stakeholders at Regulation 19 stage. This ensures that all participants are given the opportunity to provide detailed information on the supply.

2.20 East Suffolk Council did not identify that they intended to confirm the existence of a five-year land supply at the Regulation 19 stage and so participants, including Pegasus Group, did not provide detailed evidence on this matter at that stage. Accordingly, the Local Plan, once adopted will not benefit from the protection of paragraph 74.

2.21 Nevertheless, in order for the Local Plan to be effective, the Inspector should have sufficient confidence that a five-year land supply will be able to be demonstrated at the point of adoption. Indeed, the PPG (68-010) identifies that:

“The examination will include consideration of the deliverability of sites to meet a 5 year supply, in a way that cannot be replicated in the course of determining individual applications and appeals where only the applicant’s / appellant’s evidence is likely to be presented to contest an authority’s position.”

The Evidence of the Council

2.22 The Council’s Response to Inspector Questions – H1 (16/05/19) identifies a deliverable supply of 4,618 homes in the period 2018-23\(^4\). In response to question 6, the Council identify that this figure is based on the permissions, existing allocations and development with a resolution to grant planning permission in the Housing Land Supply Statement of June 2018\(^5\) (HLSS18). The HLSS18 indicates that these sources of supply will deliver 4,359 homes in this period, and so it is assumed that the difference is from emerging Local Plan allocations\(^6\). However, no trajectory has been provided for these sites. The HLSS18 provides the only assessment of the deliverable supply before the examination and the contribution from emerging allocations can only be guessed at.

\(^4\) Calculated from Table 4b (=773+1,133+1,068+796+848)
\(^5\) Document E3
\(^6\) And a site which the Council no longer considered to be deliverable at the Council Offices, Woodbridge
2.23 The HLSS18 was prepared prior to the publication of the NPPF in July 2018, the PPG in September 2018, the revisions to the NPPF and the PPG in February 2019 and the further revisions to the PPG in July 2019. It has not therefore been prepared in accordance with national policy and guidance.

2.24 Indeed, the HLSS18 was prepared in the context of the former NPPF of 2012 and the associated PPG which contained a different method of calculating the buffer, different guidance on establishing the method to address any under-delivery, and a fundamentally different definition of a deliverable site. It also considers the five-year land supply against the identified objectively assessed need at that time rather than against the proposed housing requirement.

2.25 In the absence of any assessment of the five-year land supply which accords with national policy and guidance, the Council will not have demonstrated a five-year supply upon adoption of the plan. However, as far as possible, based on the available evidence, the likely five-year land supply position is considered below.

The five-year requirement

2.26 Policy SCLP3.1 identifies a minimum housing requirement for 582dpa. Once adopted, this will provide the figure against which the five-year land supply should be assessed according to paragraph 73 of the NPPF.

2.27 This generates a five-year requirement for 2,910 homes\(^7\) in the period 2018-23 excluding any buffer. Depending upon when the Local Plan is adopted, any over or under-delivery against the annual requirement will also need to be taken into account.

2.28 The PPG (68-031) identifies that:

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.”

\(^7\) =582 x 5
2.29 The Council has not made any case that any shortfall should be addressed using any other approach and so it is assumed that in accordance with the PPG, the Sedgefield approach will be adopted.

2.30 The HLSS18 indicated that against the objectively assessed need identified at that time, there had been a record of over-delivery in the period 2014-18. It proposed to deduct this from the five-year requirement. The PPG and NPPF are both silent on the appropriate approach to adopt in such instances, but this has been addressed by two Inspectors in recent months\(^8\), one of which was endorsed by the Secretary of State. In both cases, the Inspectors concluded that any over-supply should not be deducted from the five-year requirement. To do so would treat the housing requirement as a target rather than as a minimum.

2.31 The HLSS18 applies a 20% buffer based on the record of persistent under-delivery. However, the Housing Delivery Test results of February 2019 indicate that there is not a record of significant under-delivery, such that a 5% buffer should be applied in accordance with paragraph 73 of the NPPF\(^9\).

2.32 Therefore, there is a five-year requirement for **3,056 homes**\(^10\) in the period 2018-23. In subsequent years, and under-supply will also need to be taken into account and subject to the appropriate buffer.

**The deliverable supply**

2.33 The deliverable supply identified by the Council in the context of the former NPPF of **4,618 homes** appears to comprise:

- 2,356 homes on sites which do not involve major development and had planning permission, or on sites which had detailed planning permission\(^11\), which should be considered deliverable unless there is clear evidence to the contrary;

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\(^8\) See paragraph 14 of APP/Z2830/W/18/3206346 and paragraph 203 of APP/G1630/W/3184272

\(^9\) If the Council had sought to protect the five-year land supply position under paragraph 74 of the NPPF, it would be subject to a 10% buffer in accordance with paragraph 73.

\(^10\) \(=582 \times 5 \times 1.05\)

\(^11\) As identified in the HLSS18
705 homes on sites which had outline planning permission for major development\textsuperscript{12} which should only be considered deliverable where there is clear evidence that completions will begin on site within five years;

414 homes on allocated sites\textsuperscript{13} which should only be considered deliverable where there is clear evidence that completions will begin on site within five years;

809 homes on sites which were subject to undetermined planning applications\textsuperscript{14} on proposed Local Plan allocations;

185 homes on proposed Local Plan allocations\textsuperscript{15};

A windfall allowance of 150 homes.

2.34 The 1,119 homes\textsuperscript{16} on large sites subject to outline planning permission can only be considered deliverable where there is clear evidence that completions will (rather than may) begin on site within five-years. The HLSS18 provides nothing even close to clear evidence that these will be delivered, such that on the evidence currently available to the examination, the entirety of these cannot be considered to be deliverable. This would reduce the deliverable supply to 3,499 homes.

2.35 The Council include 809 homes on three proposed allocations which were subject to undetermined planning applications at the base-date of the assessment (1\textsuperscript{st} April 2018). The largest of these, Land south and east of BT Adastral Park (also known as Brightwell Lakes) is relied upon to deliver 600 homes by 31\textsuperscript{st} March 2023 with the first completion occurring around 1\textsuperscript{st} April 2019. The site gained outline planning permission in April 2018. However, at the start of August 2019 this site is still not subject to an application for the approval of reserved matters for residential development. Two applications for the approval of reserved matters were submitted on 3\textsuperscript{rd} July for preliminary infrastructure works, but these remain to be determined. It is therefore clear that this site has been subject to considerable delays.

\textsuperscript{12} As identified in the HLSS18
\textsuperscript{13} ibid
\textsuperscript{14} ibid
\textsuperscript{15} Inferred from the difference between The Council’s Response to the Inspector’s Questions – H1 and the HLSS18
\textsuperscript{16} 705 with outline planning permission and 414 subject to an existing allocation
2.36 The Council will need to demonstrate why these delays have occurred, how any issues can be resolved and the timeframe for doing so before producing a revised trajectory for the implementation of this site. Even assuming that the barriers are resolved in a timely fashion, and an application for the approval of reserved matters for residential development are submitted in the near future, it would be expected to take at least a year until the first residential completion was achieved. Therefore, even optimistically, the contribution from this site would reduce by circa 190 homes from that identified in the HLSS18. However, without the necessary clear evidence that completions will be achieved, this site cannot be relied upon at all within the deliverable supply.

2.37 The Council then rely upon the delivery of an additional 185 homes from proposed Local Plan allocations. These, once allocated in an adopted Local Plan (assuming they are), similarly will only be able to be considered deliverable where there is clear evidence that completions will (rather than may) begin on site within five-years. This will need to be presented by the Council and tested through the examination, but in the absence of any of the necessary evidence from the Council it is not possible to address this comprehensively.

2.38 In summary, the evidence of the Council was not prepared in accordance with and does not accord with the current NPPF. In the absence of the necessary clear evidence (and in many cases any evidence), the Council is only currently able to demonstrate a deliverable supply of 2,506 homes\textsuperscript{17}, assuming the windfall allowance is justified, which equates to a \textit{4.10-year land supply}.

2.39 The ability of the Council to demonstrate a five-year land supply for the period 2018-23 will be entirely dependent upon their ability to provide the necessary clear evidence in support of large sites with outline planning permission, saved allocations and emerging allocations. Pegasus Group reserve the right to respond to such evidence as it becomes available.

\textsuperscript{17} Arising from the 2,356 homes on small sites or with detailed planning permission and the windfall allowance of 150 homes
**Question 2.7:** Given historic levels of housing completions in the Plan area, are numbers of units to be built envisaged per annum realistic and achievable?

2.40 The trajectory of the Council requires that the annual rate of delivery increases from an average of 399dpa over the last decade (2008-18) to an average of 973dpa over the next decade (2018-28). This represents the supply being 287% of that achieved in the recent past. To achieve anything like this will clearly represent a significant challenge and will only be able to be achieved through the identification of a sufficient range and choice of sites.

**Question 2.8:** Is the rate of delivery envisaged for the proposed allocations as set out in the trajectory realistic and justified?

2.41 The Council has not identified trajectories for the majority of the proposed allocations, other than for the three contained in the HLSS18. Accordingly, it is not possible to answer this question for the majority of sites.

2.42 However, as described above, the trajectory for Brightwell Lakes has already proved to be unachievably ambitious. This will need to be modified accordingly.

**Question 2.9:** The housing trajectory assumes provision of 50 dwellings per annum by way of windfalls. What is the justification for this figure and is it realistic for the duration of the plan period?

2.43 Paragraph 70 of the NPPF identifies that an allowance for windfall development can be made where there is compelling evidence that this will provide a reliable source of supply, taking account of the SHELAA, historic delivery and expected future trends.

2.44 The PPG (68-014) identifies that an assessment of the number of windfall permissions granted by year is expected.

2.45 The Council do not appear to have provided any evidence (let alone compelling evidence) which accords with the NPPF. The SHELAA (Document 10) simply assumes a windfall allowance of 50dpa without any evidence. There is no
assessment of historic windfall delivery nor any analysis of expected future trends.