Windfall Topic Paper

An assessment of the case for including a windfall allowance

January 2018

Table of Contents

1 Introduction 2
1.1 Context 2
1.2 Policy 2
1.3 Method 2
2 Past Trends 4
2.1 Annual completions 4
2.2 Sources of Windfall 7
2.3 Large and small windfall sites 9
2.4 Broad Locations 13
2.5 Non-implementation rates for committed windfall 14
3 Annual distribution of committed small windfall sites 16
4 Future Impacts 19
4.2 Market Conditions 19
4.3 Impact of large allocations 19
5 Recommendation 25
5.2 Key findings 25
5.3 A Windfall Allowance for Central Bedfordshire 27
5.4 Conclusion 28

1 Introduction

1.1 Context

1.1.1 This paper has been produced to examine the past trends and potential for future delivery of housing on windfall sites across Central Bedfordshire.

1.1.2 This paper supports a windfall allowance for residential development to be included within the five year supply of deliverable housing land and beyond.

1.2 Policy

1.2.1 Windfall is defined in the NPPF glossary as:

'Sites which have not been specifically identified as available in the Local Plan Process. They normally comprise previously-developed sites that have unexpectedly become available.'

1.2.2 Paragraph 48 of the National Planning Policy Framework (NPPF) allows local authorities to make an allowance for windfall sites in their five year supply. Local authorities may only make an allowance for windfall however if they '*have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.'* In addition to this, any windfall allowance *'should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.'*

1.2.3 The NPPG guidance on housing and economic land availability assessment advises that Local Planning Authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area, using the same criteria as set out in paragraph 48 of the NPPF.

1.3 Method

1.3.1 This report will firstly analyse past windfall completion data to address if there is justification to include an allowance for windfall in the five year housing land supply and for years 6 to 15. Further analysis of historic trends and future impacts will then be undertaken to ascertain the potential level of any allowance.

1.3.2 This paper will be comprised of the following sections:

- Past trends
    - Annual completions

    - Sources of windfall
    - Large and small windfall sites
    - Broad locations
    - Non-implementation rates and permitted windfall
- Annual distribution of committed windfall sites
- Future Impacts
    - Market conditions
    - Impact of large allocations
- Recommendation
    - Key findings
    - A windfall allowance for Central Bedfordshire
    - Conclusion

2 Past Trends

2.1 Annual completions

2.1.1 Monitoring records show that during the ten years since 2007 windfall development has consistently delivered a significant proportion of Central Bedfordshire's housing completions.

2.1.2 Table 1 presents the total number of windfall completions in Central Bedfordshire between April 2007 and April 2017. This table also shows the percentage of windfall as a proportion of total completions.

2.1.3 The data in Table 1 provides compelling evidence for the inclusion of a windfall allowance in Central Bedfordshire's five year supply of housing and beyond. As shown in Table 1, on average in Central Bedfordshire, windfall accounts for 544 completions a year. Between 2007 and 2017, 44% of all residential development completed in Central Bedfordshire has been on windfall land.

Table 1: Windfall as a proportion of completions in Central Bedfordshire between April 2007-2017

Year	Completions	Windfall	Windfall as a proportion of Completions
2007 – 2008	1366	643	47%
2008 – 2009	938	562	60%
2009 – 2010	702	331	47%
2010 – 2011	1227	716	58%
2011 – 2012	1310	598	46%
2012 – 2013	966	317	33%
2013 – 2014	1264	439	35%
2014 – 2015	1522	564	37%
2015 - 2016	1626	511	31%
2016-2017	1773	761	43%
Totals	12,694	5,442	
Annual Average	1269	544	44%

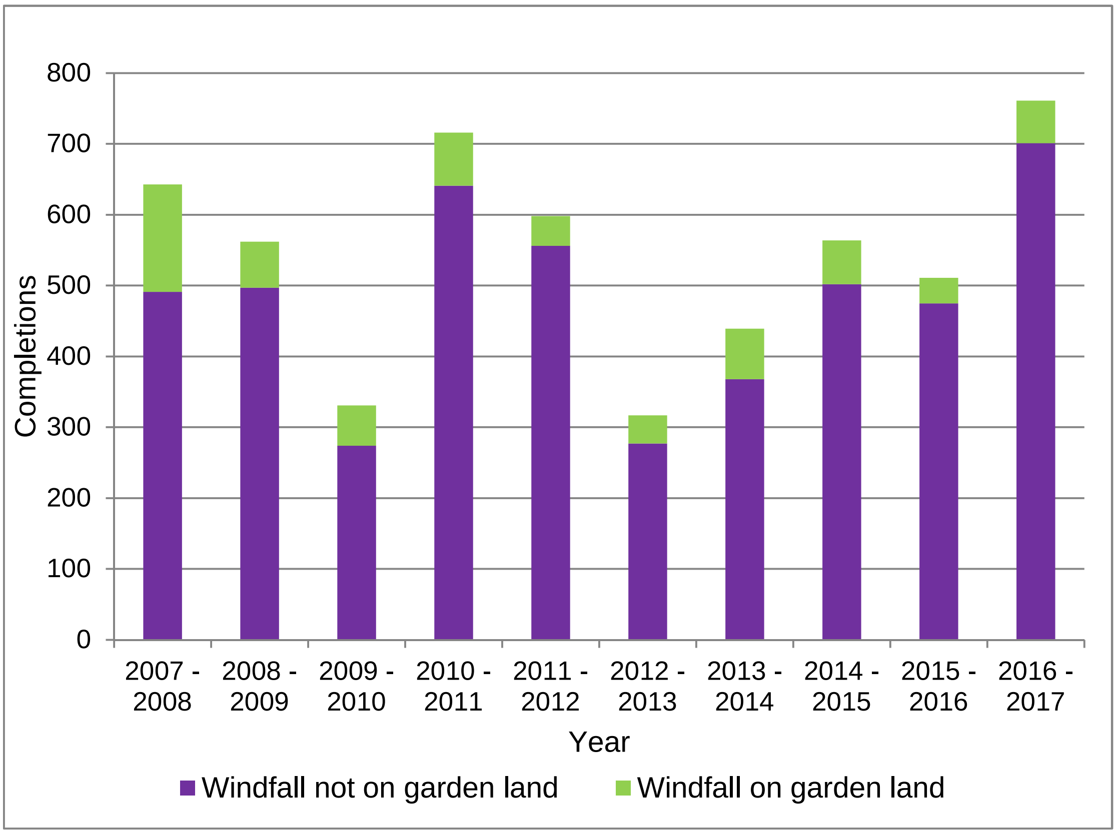
2.1.4 Although the data above provides a justification for the inclusion of a windfall allowance, it includes windfall provided on residential garden land. As discussed above, paragraph 48 of the NPPF states that completions on residential garden land should **not** be taken into account when considering historic and future rates of windfall.

2.1.5 Table 2 presents a breakdown of the proportion of historic windfall on residential garden land. Graph 1a shows this data graphically whilst Graph 1b demonstrates how the percentage of windfall which has been delivered on garden land has declined over time.

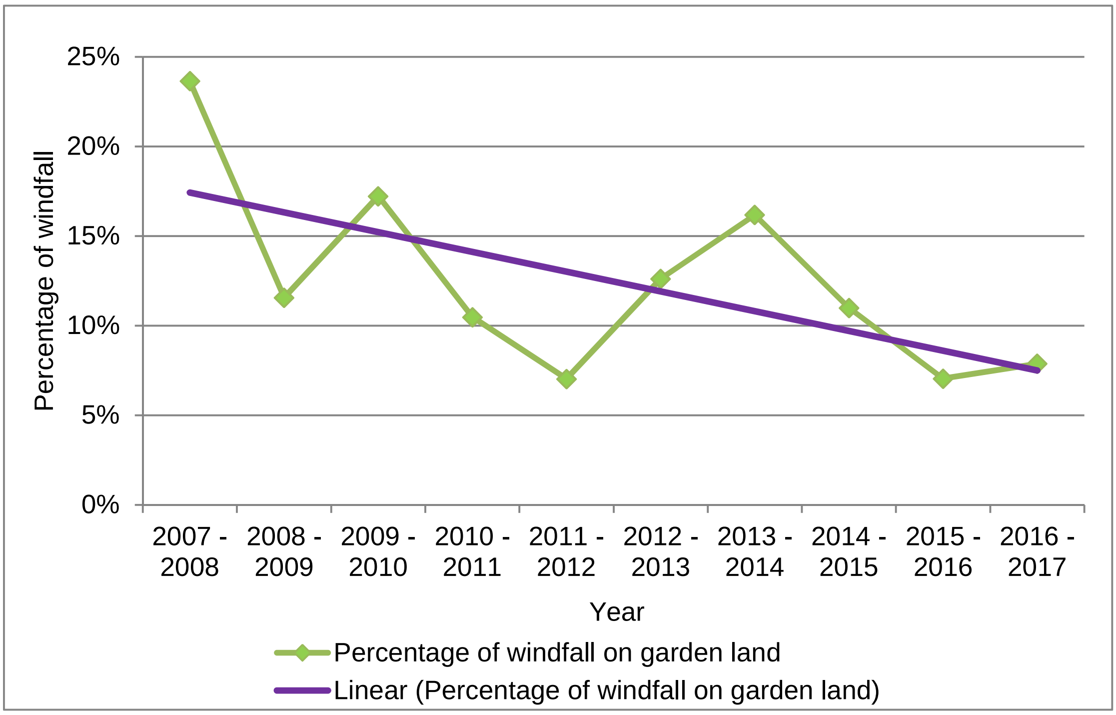
Table 2: Windfall delivered on Garden Land in Central Bedfordshire between April 2007-2017 (figures have been rounded)

Year	Total Windfall	Windfall not on garden land	Windfall on garden land	Percentage of windfall on garden land
2007 – 2008	643	491	152	24%
2008 – 2009	562	497	65	12%
2009 – 2010	331	274	57	17%
2010 – 2011	716	641	75	10%
2011 – 2012	598	556	42	7%
2012 – 2013	317	277	40	13%
2013 – 2014	439	368	71	16%
2014 – 2015	564	502	62	11%
2015 – 2016	511	475	36	7%
2016-2017	762	701	60	8%
Totals	**5,443**	**4,782**	**660**	
Annual Average	**544**	**478**	**66**	**12%**

Graph 1a: Windfall completions in Central Bedfordshire between April 2007 and April 2017



Graph 1b: Percentage of windfall on garden land



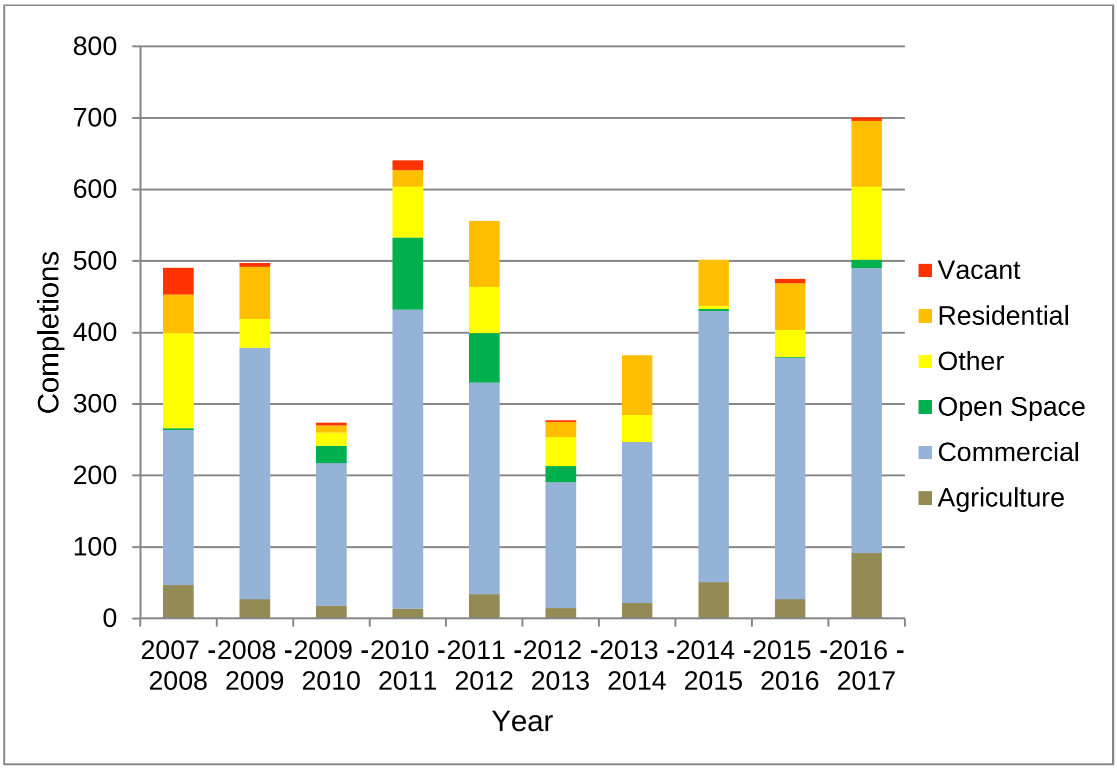
2.1.7 Over the last decade 12% of windfall completions have been on garden land. As shown in Table 2 and Graph 1b, the proportion of windfall for which garden land accounts is declining. This is likely to be due to the change in government policy following the release of the NPPF. Moving forward, completions on garden land will be discounted from windfall figures in this paper to ensure compliance with the NPPF.

2.1.8 As shown in Table 2 there have been a total of 4,782 windfall completions over the least ten years when excluding those on garden land. These completions have been on 1,104 sites. On average there have been 478 windfall completions per year.

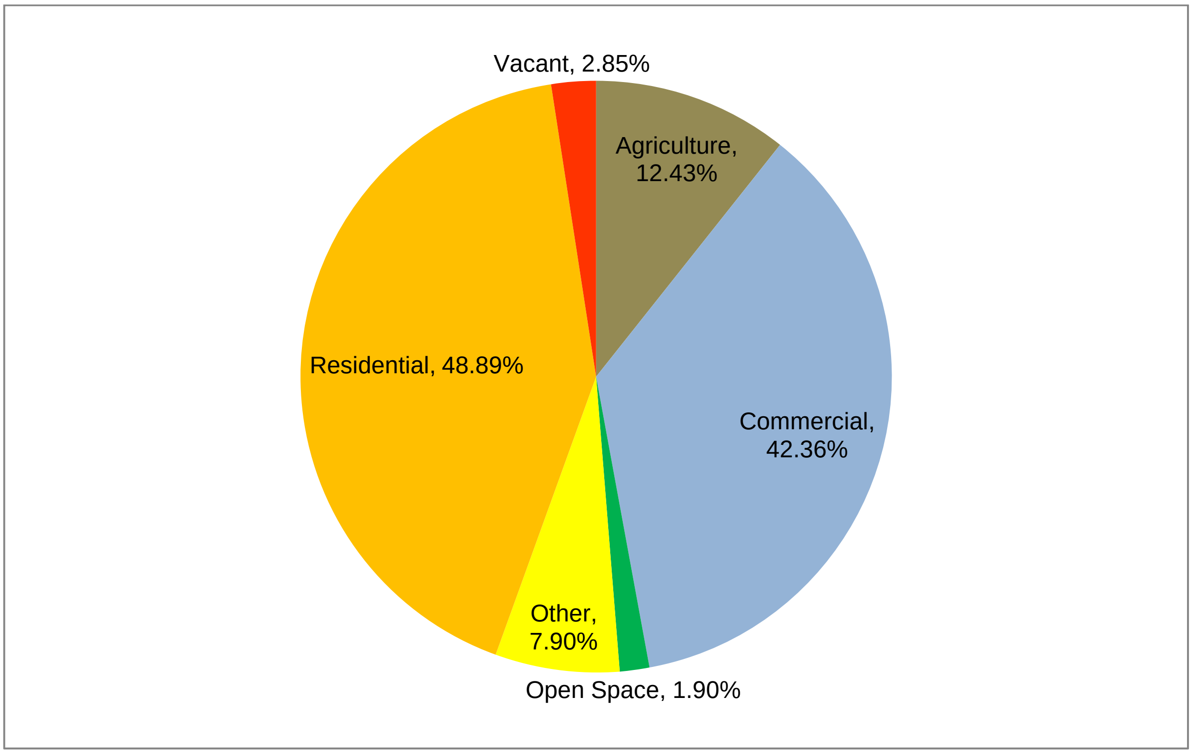
2.2 Sources of Windfall

2.2.1 Graphs 2a and 2b identify the nature of the windfall sites which have come forward over the past ten years in Central Bedfordshire. Graph 2a considers the number of completions which have come from each source over the last ten years. Graph 2b looks at the total number of overall sites which have come from each source. Both completions and number of sites have been considered to ensure consistency and reliability; this is particularly important as sites may vary in size according to their previous use, and therefore vary in terms of the number of completions possible.

Graph 2a: Windfall Completions in Central Bedfordshire between April 2007 and April 2017 by source (excluding garden land)



Graph 2b: Types of sites that contributed towards Central Bedfordshire's windfall between April 2007 and April 2017 (excluding garden land)



Completions

2.2.2 As shown in Graph 2a, sites which had previously been used for commercial use have contributed a great deal towards total windfall completions over the last decade.

2.2.3 On average 42% of all windfall developments over the last decade have been on sites which were previously used for commercial use. This commercial category includes sites which were previously used for industrial and retail activities.

Sites

2.2.4 In total 1,104 sites have contributed towards windfall delivery over the last ten years in Central Bedfordshire. Sites which previously had a residential use have accounted for 49% of the all sites on which windfall has come forward.

Analysis

2.2.5 When comparing Graphs 2a and 2b, it is clear that although windfall sites previously used for residential use make up the largest number of actual sites, windfall sites which were previously used commercially provide the greatest number of completions. It would therefore appear to be the case that windfall on previously commercial sites provides on average a greater number of units on sites.

2.2.6 In summary windfall in Central Bedfordshire comes forward from a diverse range of sources, of which sites previously used for commercial or residential use contribute significantly. The data presented above shows that windfall has consistently been delivered from a wide range of sources over the past decade.

2.3 Large and small windfall sites

2.3.1 As the Council receives substantial numbers of windfall applications every year, it is necessary to break these down into two categories. These are:

- Large windfall sites: Sites with 10 dwellings or more; and
- Small windfall sites: Sites with 9 dwellings or fewer.

2.3.2 Large windfall sites are listed individually on the Housing Trajectory. The information held on these sites is updated regularly. Site specific intelligence includes information provided to the Council by the agent/applicant/developer, data collected from quarterly site visits and information on the progress of the application provided by the case officer.

2.3.3 Small windfall sites are grouped together. It is felt that due to the size of these developments and the large numbers of applications received and approved, it is not practicable to individually list them.

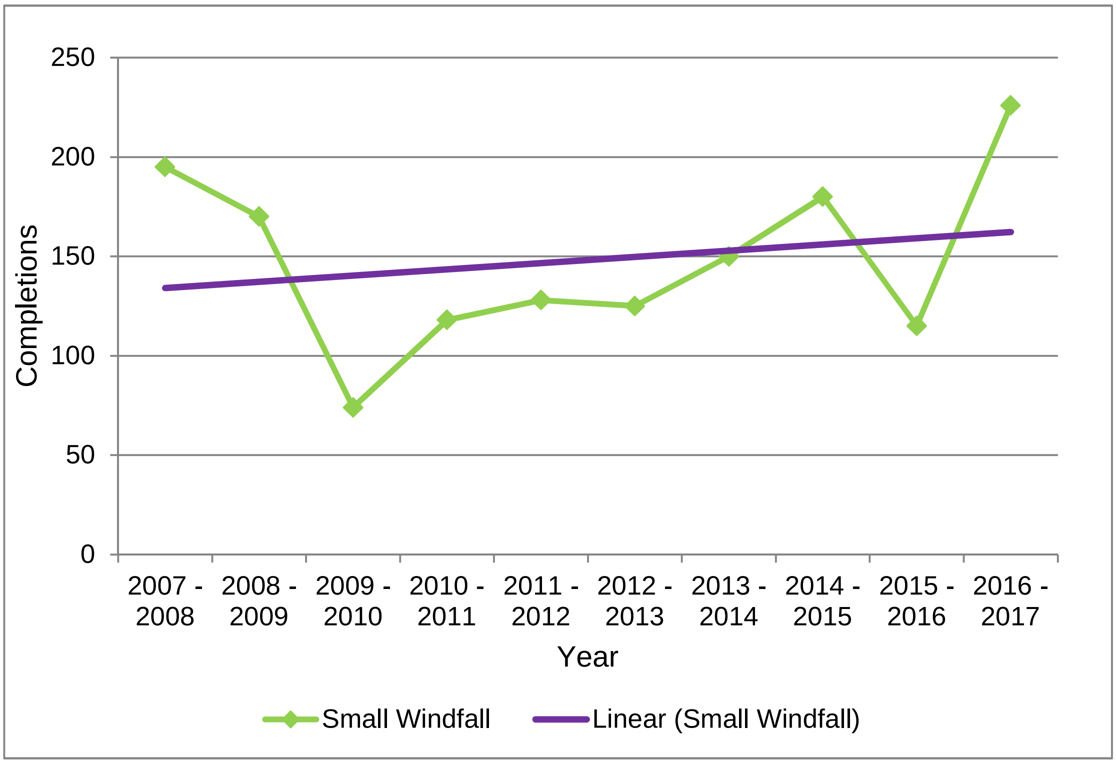
Table 3: Proportion of windfall which has come forward on small and large sites between April 2007- April 2017 (excluding garden land).

Monitoring Year	Small Windfall	Large Windfall	Total Windfall
2007 - 2008	195	296	491
2008 - 2009	170	327	497
2009 - 2010	74	200	274
2010 - 2011	118	523	641
2011 - 2012	128	428	556
2012 - 2013	125	152	277
2013 - 2014	150	218	368
2014 - 2015	180	322	502
2015 - 2016	115	360	475
2016-2017	226	475	701
Totals	1481	3301	4782
Annual Average	148 (31%)	330 (69%)	478

Windfall on small sites

2.3.4 In terms of annual housing completion figures, it is clear from the evidence in Table 3 that although only up to 9 dwellings, small sites are significant in terms of their delivery. On average 31% of windfall has been provided on small sites over the last ten years, this is on average 148 dwellings per annum which are being brought forward on sites of 9 dwellings or fewer.

Graph 3: Windfall completions on small sites in Central Bedfordshire between April 2007 and April 2017 (excluding garden land)



2.3.5 Graph 3 shows that although the number of windfall completions on small sites does fluctuate, there is no evidence to suggest that the sources of this supply are diminishing.

2.3.6 As at 1st April 2017, a total of 774 dwellings were permitted on small windfall sites across Central Bedfordshire. This is substantially higher than any other year during the last five years. This together with the sharp increase of housing delivery on these sites in 2016-17 indicates a potential surge in housing delivery from this source.

2.3.7 It is likely that it is appropriate for a small windfall allowance to be included in the five year supply and beyond. It is however first necessary to understand when the committed small windfall sites will be delivered to ensure that any allowance does not double count those sites that are already committed. This is addressed in section 3 of this paper.

<u>Windfall on large sites</u>

2.3.8 When looking at a potential windfall allowance for large windfall sites, it is important to ensure that there is no double counting with the quantum of 10+ windfall sites which are already listed on the Housing Trajectory. As at October 2017 a total of 4,023 dwellings on large windfall sites are included in the Housing Trajectory to be delivered up to 2035. Of these, 3,407 are scheduled for delivery within the five year supply period. Past completion data, as given in Table 3, shows that this source has delivered 330 dwellings per year on average since 2007/08. Over a five year period this equates to 1,650 completions. It is however considered that the number of permitted large windfall sites has increased recently in large part due to the effects of the 'presumption in favour of sustainable development'. These 'presumption in favour sites' have yet to deliver. This results in a situation where permitted windfall comprises of 'presumption in favour' sites whereas the trend data does not. Nonetheless, due to the complexity of this issue it is concluded that there is no case to add a windfall allowance for larger sites within the five year period at this point in time.

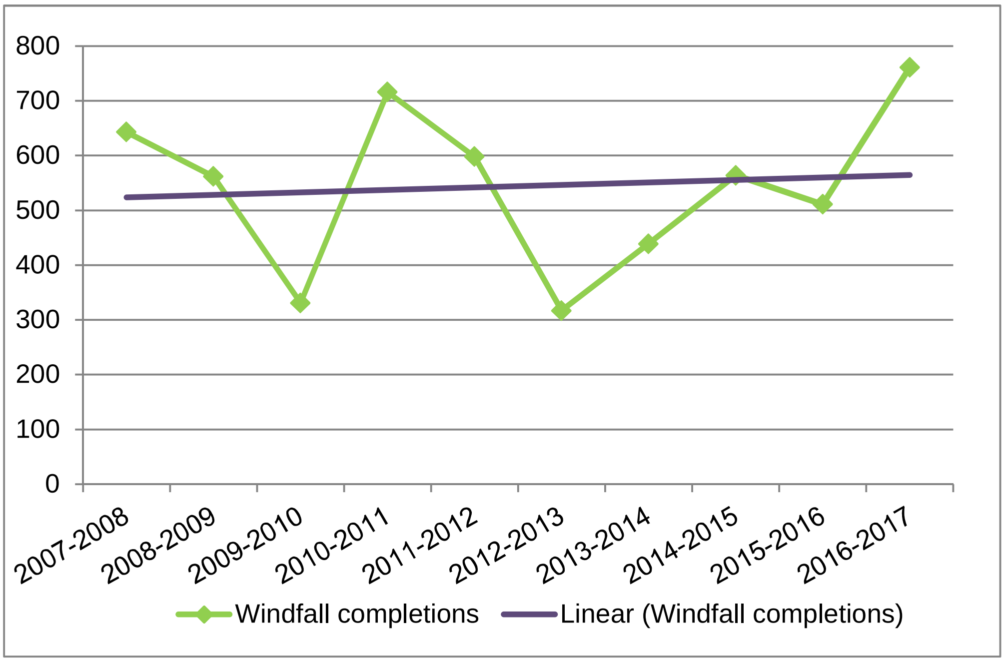
2.3.9 Beyond the five year supply period the level of windfall commitments in the Housing Trajectory drops substantially. It is therefore reasonable to include a windfall allowance in the Housing Trajectory for years 6-15 as set out in paragraph 48 of the NPPF.

Windfall allowance beyond the five year supply period

2.3.10 Past trends tell us that on average 478 dwellings are built on non garden land windfall sites each year. The Housing Trajectory also shows us that after the five year supply period the amount of windfall development listed in the supply for both large and small sites falls dramatically. It is therefore concluded that there is a case for a windfall allowance for sites of all sizes to be included in the Trajectory after the first five years.

2.3.11 Past annual completion figures show us that windfall land is not a diminishing resource and 2016/17 saw the highest levels of windfall completions over the last 10 years.

Graph 4: Windfall completions



2.4 Broad Locations

2.4.1 Housing and Economic Land Availability Assessment guidance tells us that local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area. The Council has therefore undertaken analysis of the geographical distribution of windfall development over the past 10 years. The results of this analysis show that windfall development over the last 10 years has been distributed throughout Central Bedfordshire.

2.4.2 Appendix 1 to this paper lists all parishes in Central Bedfordshire in order of their windfall delivery (on non garden land) since 2007. Those parishes that contribute the most to windfall delivery are typically more urban in nature. Those top performing parishes also broadly align with the Major and Minor Services Centres listed in the Pre-submission Local Plan. This has been used to determine broad locations to which windfall allowances can be made.

2.4.3 The table below sets out groupings of parishes based on their contribution to windfall delivery and geographical location.

Table 4: Windfall delivery by broad location (figures have been rounded)

Broad Location	Annual Average Delivery (figures have been rounded)	Percentage of annual windfall delivery
Dunstable and Houghton Regis	166	35
Leighton Linslade	73	15
Biggleswade, Sandy and Potton	54	11
Ampthill, Flitwick and Maulden	32	7
Stotfold, Arlesey and Stondon	34	7
Shefford, Clifton and Henlow	34	7
Cranfield and Marston Moretaine	6	1
Barton, Toddington and Harlington	11	2
The rest of Central Bedfordshire	69	14
Total	**479**	

2.4.4 The urban areas of Central Bedfordshire do deliver the most windfall completions but that does not mean the rest of Central Bedfordshire is insignificant as a source of windfall development. The remaining areas of Central Bedfordshire, which consist mostly of rural villages, deliver 14% of all non garden land windfall in Central Bedfordshire. Many of these sites will be small infill plots or conversions of agricultural buildings to dwellings for example. Any allowance for windfall should therefore include this as a source of development.

2.5 Non-implementation rates for committed windfall

2.5.1 Experience tells us that a notable number of permissions will expire. However, it is not considered necessary to apply a non-implementation rate to the permitted large windfall sites. The Housing Trajectory discounts sites or pushes their delivery back where site specific information indicates that permission may not come forward or there is a known practical barrier to delivery. For this reason it is not considered necessary to apply a non-implementation rate to large windfall or large allocated commitments as this is dealt with on a case by case basis. It is also the case that it is rare for permissions for sites of this size to expire. Monitoring records tell us that only nine applications have lapsed on sites of 10+ dwellings during the last six years. In all but one of these cases the expired application was very quickly replaced with an application for a new scheme. It is for these reasons that it is considered that the case by case assessment of sites is preferable to applying a blanket non-implementation discount.

2.5.2 As small windfall commitments are grouped together and not individually assessed, it is necessary to apply a non-implementation rate to this category. The method for doing this is discussed in the following section of this paper.

3 Annual distribution of committed small windfall sites

3.1.1 Understanding the distribution of committed windfall delivery across the five year period allows us to apply a realistic windfall allowance that does not double count with other sites already in the Housing Trajectory. This section of the paper takes the windfall which already has permission, and assesses in which year these completions will occur, taking into account a non-implementation rate and also the potential for some completions to fall outside of the five year supply period. Following this, a realistic windfall allowance can be applied across the five year period, taking into account when committed windfall will be completed.

Table 5: An assessment of past completion and expiry rates for small windfall sites.

Date	No. with planning permission	Expiries (dwellings) during 12 months following		Completions (dwellings) during 12 months following	
		Number	Percentage	Number	Percentage
01/04/2012	466	37	7.94%	121	25.97%
01/04/2013	521	12	2.30%	145	27.83%
01/04/2014	519	33	6.36%	204	39.31%
01/04/2015	532	17	3.20%	196	36.84%
01/04/2016	596	17	2.85%	241	40.44%
Average	**526.8**	**23.2**	**4.40%**	**181.4**	**34.43%**

3.1.2 Table 5 uses data from 2012-2016 to calculate the average expiry and completion rates for windfall on small sites. The total number of dwellings with permission on the 1st April each year is compared to the number of dwellings which were completed, and the number of dwellings for which permission expired over the 12 months following this date. This results in annual expiry and completions rates based on permitted stock at the beginning of the year for each of the five years. The average expiry and completion rates across the five years show that of the number of dwellings permitted on the 1st of April, on average 34.43% will be completed whilst permission will expire for 4.40% in the following 12 months.

3.1.3 Although the average annual expiry rate is calculated in Table 5 to be 4.40%, an expiry rate of 10% is recommended to ensure a robust trajectory.

3.1.4 As of the 1st April 2017, a total of 774 dwellings were permitted on small sites across Central Bedfordshire. The timing of the delivery of these sites is projected in Table 6. This has been achieved by applying the average permission and expiry rates calculated in Table 5 to the number of dwellings with permission on April 1st for each year.

Table 6: Estimated completions and expiries for committed windfall at April 1st 2017

	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 - 2023	2023 - 2024	2024 - 2025	2025 - 2026	2026 - 2027	2027 - 2028	2028 - 2029	2029 - 2030
Outstanding permissions expected as of April 1st	774	430	239	133	74	41	23	13	7	4	2	1	1
Estimated Completions (34.43%)	266	148	82	46	25	14	8	4	2	1	1	0	0
Estimated Expiries (10%)	77	43	24	13	7	4	2	1	1	0	0	0	0
Estimated permissions to carry to following April	430	239	133	74	41	23	13	7	4	2	1	1	0

3.1.5 Table 6 provides us with an estimate of how the permitted small windfall sites may be distributed. In total for the five year 2017-2022 it is estimated that there would be 568 completions, and 164 units for which permission would expire assuming a 10% expiry rate.

3.1.6 On 1st October 2017 there were 836 dwellings with planning permission on small windfall sites. Although midway through the year the same process as above can be used to calculate the estimated delivery of small windfall sites from this point in time. This allows an allowance for windfall to be aligned with completions up to 30th September 2017.

Table 7: Estimated completions and expiries for committed windfall at October 1st 2017

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13
Outstanding permissions expected as of October 1st	836	465	258	143	80	44	25	14	8	4	2	1	1
Estimated Completions (34.43%)	288	160	89	49	27	15	8	5	3	1	1	0	0
Estimated Expiries (10%)	84	46	26	14	8	4	2	1	1	0	0	0	0
Estimated permissions to carry to following April	465	258	143	80	44	25	14	8	4	2	1	1	0

4 Future Impacts

4.1.1 This section provides a brief analysis of other factors influencing the windfall calculations made in this paper.

4.2 Market Conditions

4.2.1 The time period over which past windfall trends have been assessed includes a significant global economic downturn. This is picked up in the analysis of past trends and their forward projection. Windfall has begun to increase steadily since the most recent dip in 2012/13. Therefore it could be concluded that the yearly averages calculated within this windfall paper are in fact conservative estimations and that no adjustments are necessary to allow for different market conditions.

4.2.2 There have been significant changes in policy over the period for which windfall allowance is assessed. Flexibility provided by policies in the NPPF has encouraged windfall through a variety of sources. In particular there is a more permissive stance regarding change of use from commercial to residential. This alongside the recent changes to Permitted Development Rights is likely to encourage more landowners to pursue residential development, hence increasing the number of windfall completions.

4.3 Impact of large allocations

4.3.1 When setting a windfall allowance it is important to address future trends. It is recognised that the delivery of large strategic sites may impact on windfall rates. It has therefore been necessary for the Council to undertake some analysis in order to understand the scale of such an impact on small windfall sites and windfall development as a whole

4.3.2 A number of large scale allocations are identified by the emerging Local Plan to be delivered at varying points during the plan period. It is therefore necessary to take this into account when setting an allowance for windfall development.

4.3.3 In order to address the impact of large scale sites on the surrounding areas, other large sites in the district have been assessed to determine if their development has resulted in a reduction in windfall completions. Both Land East of Biggleswade and Land South of Leighton Buzzard are assessed in detail below.

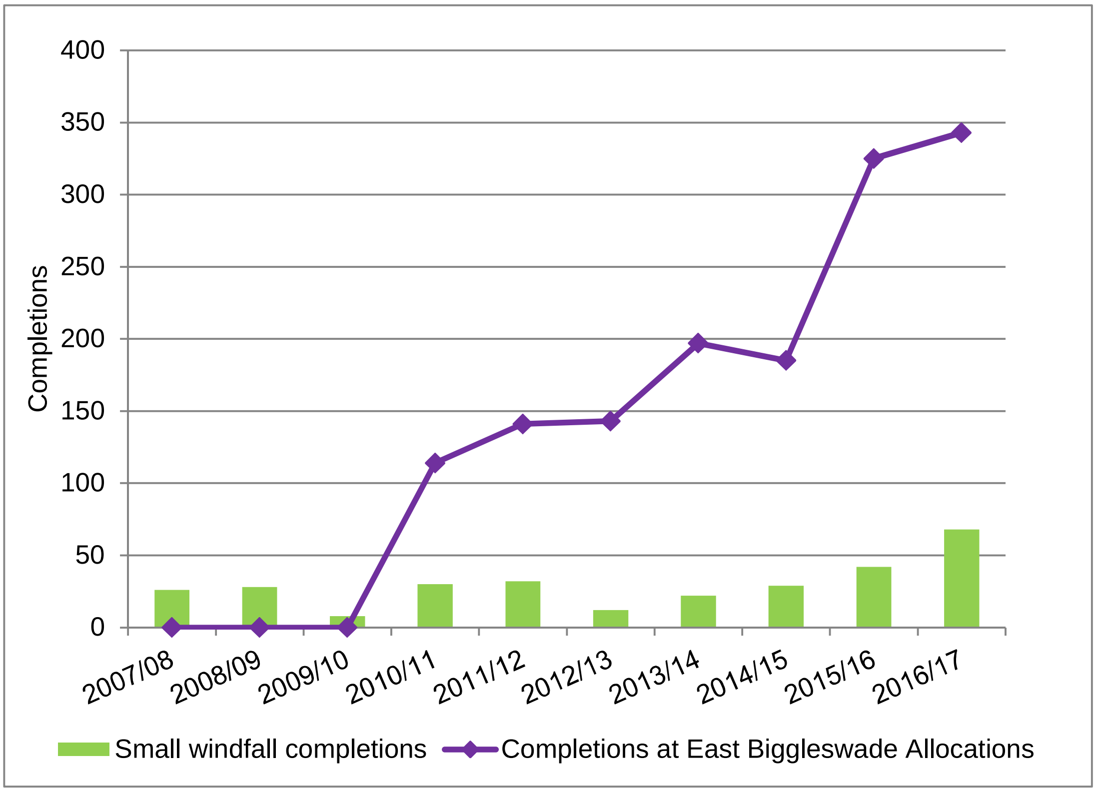
<u>East of Biggleswade Allocations</u>

4.3.4 Land East of Biggleswade and north of Potton Road Biggleswade are neighboring allocations which when complete will deliver a total of

2,400 dwellings. Completion records have been assessed to show the number of completions on small windfall sites and windfall development as a whole in Biggleswade and the surrounding parishes before and after commencement of this development. The data for completions on windfall sites since 2007/08 for Biggleswade, Sandy, Langford, Dunton, Northill and Southill has been used.

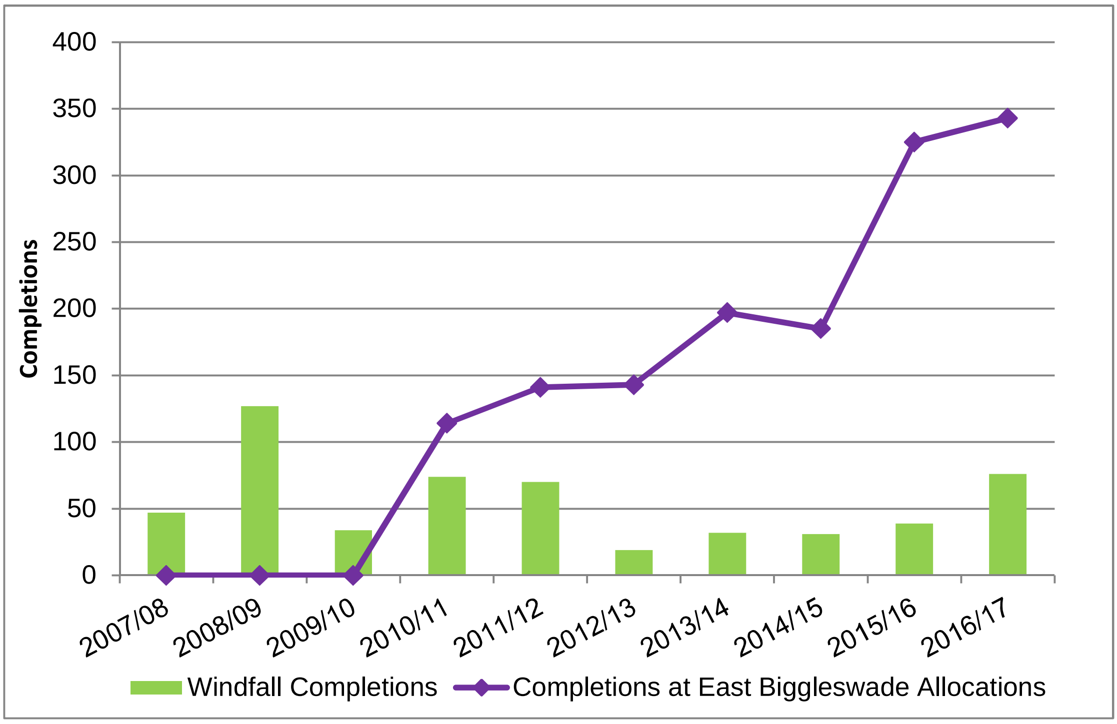
4.3.5 Graph 6 presents the completions on small windfall sites in Biggleswade and surrounding parishes, mapped against the completions at the allocated sites. The graph shows that delivery on the large allocated sites has no negative impact on the delivery of housing on small windfall sites.

Graph 6: Completions on small windfall sites in Biggleswade and surrounding parishes (on non garden land) in comparison to completions on large allocated sites east of Biggleswade



4.3.6 Graph 7 presents the completions on all windfall sites in Biggleswade and the surrounding parishes mapped against the completions at the allocated sites. There is a weak negative correlation where an increase in completions at the large allocation results in a reduction in the number of completions on windfall sites as a whole.

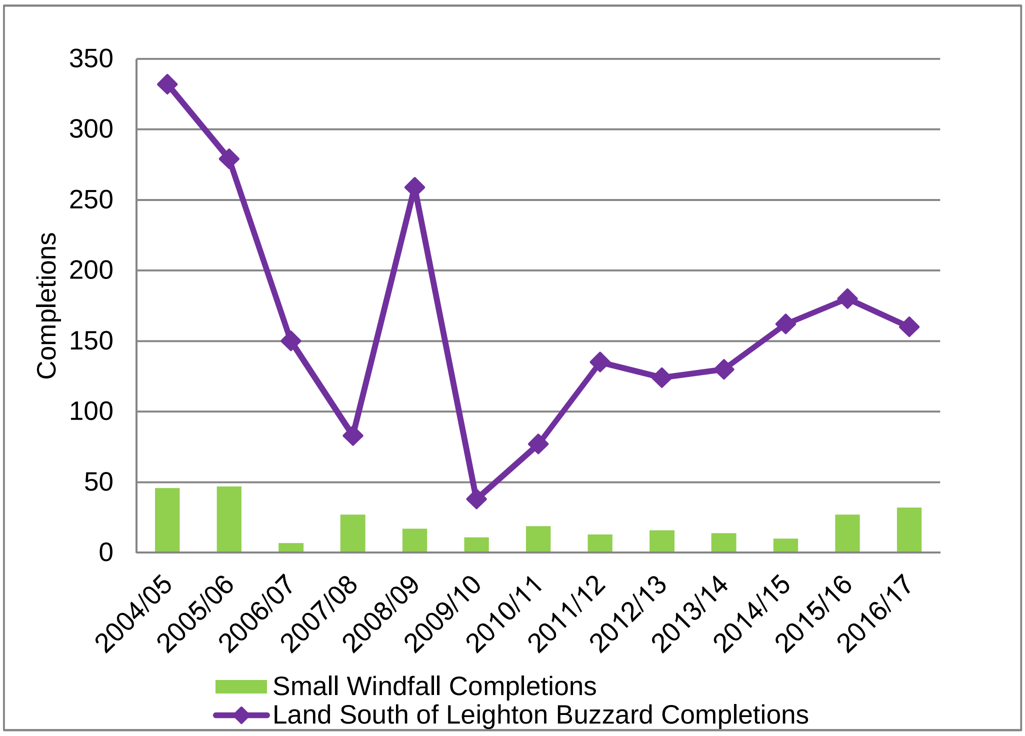
Graph 7: Completions on all windfall sites in Biggleswade and surrounding parishes (on non garden-land) in comparison to completions on large allocated sites east of Biggleswade



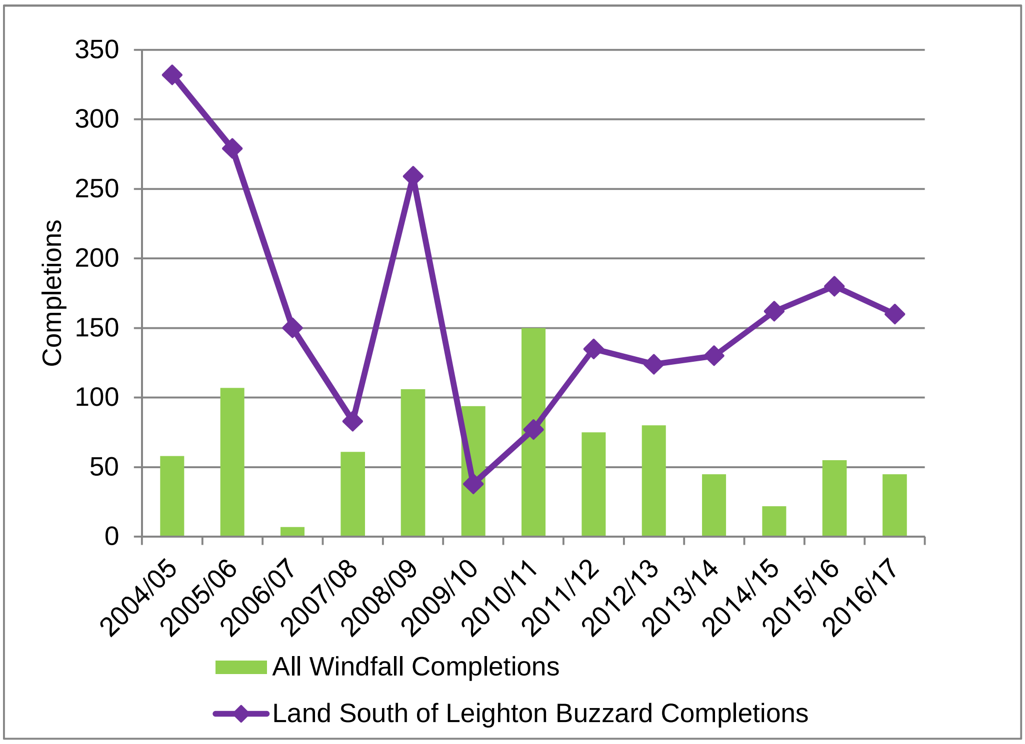
South of Leighton Buzzard

4.3.7 This is a large allocated site to the south of Leighton Buzzard which totals 2,036 dwellings. Graph 8 presents the completions on small windfall sites in Leighton Linslade parish mapped against the completions at the large allocated sites. Delivery of this site goes back some time so we have used data available to us on completions since 2004/05. Graph 8 below shows that delivery on the large allocated sites has had no negative impact on the delivery of housing on small windfall sites.

Graph 8: Completions on small windfall sites in Leighton Linslade (on non-garden land) in comparison to completions at Land South of Leighton Buzzard Allocation



Graph 9: Completions on all windfall sites in Leighton Linslade (on non garden land) in comparison to completions at land south of Leighton Buzzard Allocation



4.3.8 Graph 9 presents the completions on all windfall sites in Leighton Linslade mapped against the completions at the allocated sites. There appears to be a negative correlation where an increase in completions at the large allocation results in a reduction in the number of completions on windfall sites as a whole. However, it is important to note that the drop in windfall development in 2009/10 also correlates with the drop in housing delivery in Central Bedfordshire as a whole due to the global economic downturn. It is therefore difficult to determine the extent to which development at the large allocation negatively impacted on small windfall completions.

4.3.9 Based on the above analysis it is reasonable to conclude that the delivery of large allocations during the plan period will have a negligible impact on the delivery of small windfall sites. A deduction of no more than 5% should therefore be applied.

4.3.10 The impact on windfall as a whole is however expected to be more notable. Although windfall completions are increasing annually, when setting a windfall allowance after year five of the Housing Trajectory, it is advised that a reduction is made to take account of the potential impact of large allocated sites. Table 8 below details the quantum of windfall allowance for each broad location after reductions of 20%, 30% and 40% have been applied to the annual average delivery figures.

Table 8: Reduction to windfall allowance by broad location (figures have been rounded which may account for very minor discrepancies)

Broad Location	Annual Average Delivery (figures have been rounded)	Windfall allowance after reduction		
		20% reduction	30% reduction	40% reduction
Dunstable and Houghton Regis	166	133	116	100
Leighton Linslade	73	58	51	44
Biggleswade, Sandy and Potton	54	43	38	32
Ampthill, Flitwick and Maulden	32	26	22	19
Stotfold, Arlesey and Stondon	34	27	24	20
Shefford, Clifton and Henlow	34	27	24	20
Cranfield and Marston Moretaine	6	5	4	4
Barton, Toddington and Harlington	11	9	8	7
The rest of Central Bedfordshire	69	55	48	41
Total Windfall Allowance	**479**	**383**	**335**	**287**

5 Recommendation

5.1.1 This paper has presented a compelling case for the inclusion of a windfall allowance for sites of 9 dwellings or fewer within Central Bedfordshire's five year housing land supply and for an allowance in years 6 to 15. This section summarises the key findings and recommendations of this paper.

5.2 Key findings

Case for a windfall allowance

5.2.1 A thorough analysis of completion data for the past ten years has shown that windfall makes a significant contribution towards completions in Central Bedfordshire; approximately 44% of the completions in Central Bedfordshire between April 2007 and April 2017 were on windfall sites. These windfall completions include garden land; however national policy specifically precludes including garden land when determining an allowance for windfall. An analysis of windfall on garden land was undertaken which showed that garden land completions as a proportion of windfall is declining. This is likely to be due to the change on government policy. Regardless of this, all garden land completions were removed from the windfall completions data for trend analysis in this paper. This ensures that all resulting windfall figures are compliant with national policy guidance.

Sources of windfall

5.2.2 A brief analysis was undertaken to understand any trends in regard to the previous uses of the windfall sites coming forward. This analysis showed that sites which previously had a commercial use contributed towards the greatest number of actual completions, whereas sites which previously had a residential use contributed the greatest number of development sites. Overall it was concluded that windfall in Central Bedfordshire has been consistently delivered from a diverse range of sources over the past decade.

Large and small windfall sites

5.2.3 For monitoring purposes, the Council records windfall completions within two separate categories; large windfall sites (those with 10 dwellings or more); and small windfall sites (those with 9 dwellings or fewer).

5.2.4 Large windfall sites are individually listed on the Housing Trajectory which is updated quarterly. Past trends show that on average 330 windfall dwellings per year have been delivered on large sites, if past trends were to continue then this would equate to 1,650 completions over five years. On 1st October 2017, the Housing Trajectory reported a figure in excess of this to be delivered on larger windfall sites over the five supply period. Therefore due to the number of large windfall sites already listed in the Housing Trajectory it would be inappropriate to make an additional allowance for large windfall in the five year supply period.

5.2.5 On average 148 dwellings per year have been delivered on small windfall sites. Due to their size, these sites are typically permitted and delivered at a faster rate. At 1st April 2017 there were 774 dwellings permitted on small sites. After conducting an exercise to estimate when these dwellings will be delivered it is concluded that there is a case for a small windfall allowance in the five year supply period.

5.2.6 After the five year supply period the amount of windfall listed in the Housing Trajectory falls significantly. It is therefore concluded that there is justification for an allowance of windfall after this point. Past trends tell us that on average 478 dwellings are delivered each year and an exercise has been undertaken looking into the spatial distribution of this delivery.

Non-implementation rate

5.2.7 This paper does acknowledge that some permissions will expire. Due to the way in which larger sites are assessed individually on a regular basis for the Housing Trajectory, it is not necessary to apply a non-implementation rate to larger sites. As small sites are grouped together on the Housing Trajectory and not individually assessed, it is necessary to apply a non-implementation rate to these permissions. Past trend data from 2012, 2013, 2014, 2015 and 2016 shows that on average 4.4% of the extant permission at 1st of April each year expired in the 12 months following. To ensure a robust trajectory however, this paper concludes that a 10% expiry date is applied. The same trend data shows that on average 34.43% of dwellings with permission as of the 1st of April each year were completed in the 12 months following.

5.2.8 Table 6 projects how the completions and expiries for the 774 dwellings which were permitted on small sites at 1st April 2017 are likely to be distributed across the supply period. Table 7 projects completions and expiries from 1st October 2017.

Broad Locations

5.2.9 Broad locations have been identified in order to understand the distribution of windfall development. While, urban areas of Central Bedfordshire typically deliver the most windfall completions, the contribution of the rural area still remains significant. Broad locations have been based on parish groupings and have been used to determine recommendations for a windfall allowance.

Impact of national policy and market conditions

5.2.10 The trends and forward projections in this paper are considered to be conservative estimates. This is primarily because the data used in this paper includes a period of significant economic downturn, which is therefore included within the trends and forward projections. In addition to this, a proportion of the trend data is from the years preceeding the release of the NPPF. This is particularly noteworthy as the flexibility provided by NPPF policies, in particular the more permissive stance regarding the change of use from commercial to residential, is likely to encourage landowners to pursue residential development, hence increasing windfall completions. Moving forward, windfall completions are likely to increase further as a result of recent national policy changes particularly in terms of Permitted Development Rights.

Impact of large allocations

5.2.11 During the plan period a number of large allocated sites are planned to be delivered. Therefore, this paper has assessed what impact this scale of development may have on delivery from windfall. Past data from Land East of Biggleswade and Land South of Leighton Buzzard has been analysed and the paper has concluded that the delivery of large allocations will have a negligible impact on delivery of windfall on small sites but a negative impact on windfall as a whole. In the interest of robustness this paper recommends applying a 5% reduction to any small windfall allowance after year one of the five year supply period and a more significant reduction to windfall as a whole in years 6 to 15.

5.3 A Windfall Allowance for Central Bedfordshire

5.3.1 The past trend data indicates that an average 148 windfall dwellings per year are completed on small sites. Applying the 5% reduction to take account of any impact from the delivery of strategic sites gives 141 dwellings per annum. In the interest of robustness this has been rounded down to a recommended allowance of 140 dwellings per annum. This is considered to be an achievable level of delivery from this source particularly as there is no indication that the supply of small windfall sites is diminishing. This allowance should be applied to each year in the five year supply unless the estimated delivery of committed small windfall is higher. There is no case for an allowance for larger windfall sites in the five year supply period.

5.3.2 Trend data also shows us that on average 478 dwellings are completed on non garden land windfall sites of all sizes each year. The majority of these completions are in the more urban parishes but the number delivered in the rural area remains significant. It is recommended that due to existing commitments, a windfall allowance for sites of all sizes should be made after the five year supply period. In the interests of robustness and to address any potential impact on delivery by large allocation sites, it is also recommended that a discount is applied to the allowance. Though the impact of large allocations cannot be forecast in detail, analysis of existing developments shows that a negative impact might occur. This paper provides figures after reductions of 20%, 30% and 40% are applied to annual average delivery rates. Though the supply of windfall sites does not appear to be diminishing it is important for the Local Plan to not be overly reliant on this source of supply. It is therefore recommended that a conservative approach is adopted and a 40% reduction is applied.

5.4 Conclusion

5.4.1 The above analysis demonstrates a compelling case for the inclusion of a windfall allowance in Central Bedfordshire's housing land supply. Windfall sites have historically made a consistent and significant contribution to the overall housing delivery in the authority area and are likely to continue to do so.

5.4.2 Central Bedfordshire is a varied district and this is borne out by the sources of windfall development. Redundant commercial sites have provided a large source of windfall completions. Other sources such as intensification of residential areas and agricultural conversions have also made highly notable contributions.

5.4.3 The consistent stream of supply from windfall sites is clearly apparent. To not include an allowance in the housing supply would under-estimate the capacity of the area.

Appendix A Dwellings completed on windfall sites by parish

Windfall by parish	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total dwellings delivered (net)	Annual Average
Dunstable	148	6	57	175	103	14	105	153	190	334	1285	128.5
Leighton Linslade	61	106	94	150	75	80	45	22	55	45	733	73.3
Houghton Regis	3	9	26	106	83	23	29	41	2	49	371	37.1
Biggleswade	15	111	32	39	29	6	24	16	26	40	338	33.8
Shefford	23	125	0	38	13	3	2	1	7	13	225	22.5
Stotfold	3	8	0	1	9	15	28	70	29	24	187	18.7
Ampthill	42	5	-3	-5	26	14	21	18	17	24	159	15.9
Sandy	31	8	2	33	23	1	4	4	3	10	119	11.9
Flitwick	64	0	9	12	4	2	11	6	0	3	111	11.1
Arlesey	5	3	4	5	12	5	2	0	29	19	84	8.4
Potton	15	1	1	2	1	24	0	0	26	11	81	8.1
Clifton	1	14	1	1	18	13	3	18	1	0	70	7
Caddington	0	9	0	0	17	1	8	0	0	31	66	6.6
Stondon	15	7	3	4	29	0	7	0	-1	1	65	6.5
Northill	1	1	0	1	12	11	1	10	2	20	59	5.9
Maulden	7	1	3	0	18	4	4	2	5	7	51	5.1
Barton	7	15	0	5	16	3	0	1	1	0	48	4.8
Henlow	1	1	4	4	5	0	-1	25	8	0	47	4.7
Toddington	4	0	2	13	0	9	1	11	2	5	47	4.7
Cranfield	0	3	16	7	3	3	1	0	2	-1	34	3.4
Heath and Reach	0	6	2	0	3	1	1	10	10	0	33	3.3

Windfall by parish	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total dwellings delivered (net)	Annual Average
Westoning	4	10	0	14	0	0	3	0	2	-1	32	3.2
Shillington	0	5	0	1	5	1	13	4	-1	1	29	2.9
Aspley G	1	1	0	0	1	4	1	2	2	16	28	2.8
Eaton Bray	2	0	1	0	1	9	2	12	2	-1	28	2.8
Marston Moretaine	6	6	2	0	9	0	1	0	-1	3	26	2.6
Woburn	0	0	6	1	1	5	12	1	0	0	26	2.6
Studham	0	0	0	1	2	0	-2	12	12	0	25	2.5
Billington	0	0	0	0	0	0	16	2	1	5	24	2.4
Hockliffe	0	0	0	16	6	0	0	0	0	1	23	2.3
Langford	0	4	0	0	6	1	2	1	5	4	23	2.3
Lidlington	0	0	0	0	0	0	0	7	10	6	23	2.3
Houghton Conquest	1	7	0	1	10	1	0	0	2	0	22	2.2
Flitton & Greenfield	1	6	7	2	1	0	0	2	0	0	19	1.9
Brogborough	0	0	0	0	0	0	2	16	0	0	18	1.8
Clophill	9	1	0	3	1	0	0	0	1	2	17	1.7
Silsoe	2	0	0	0	0	6	0	4	4	1	17	1.7
Tilsworth	0	0	0	0	1	1	2	12	0	0	16	1.6
Wrestlingworth	5	0	4	0	0	0	0	-1	0	7	15	1.5
Harlington	0	0	0	0	0	0	0	11	0	1	12	1.2
Tempsford	4	8	0	0	0	0	0	0	0	0	12	1.2
Kensworth	1	0	0	3	0	1	5	0	1	-1	10	1
Moggerhanger	0	0	0	2	1	1	0	0	1	5	10	1

Windfall by parish	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total dwellings delivered (net)	Annual Average
Stanbridge	0	0	0	0	1	1	7	-1	1	1	10	1
Ridgmont	0	1	0	3	0	1	0	0	2	2	9	0.9
Old Warden	0	0	0	0	8	0	1	0	0	-1	8	0.8
Pulloxhill	-1	1	0	0	1	2	0	3	0	2	8	0.8
Tingrith	0	0	0	0	0	8	0	0	0	0	8	0.8
Southill	0	2	0	0	0	0	0	0	3	2	7	0.7
Aspley Heath	0	0	1	0	0	2	0	0	3	0	6	0.6
Blunham	0	0	0	1	0	-2	2	3	1	0	5	0.5
Eversholt	4	0	0	0	0	0	0	0	1	0	5	0.5
Gravenhurst	0	2	0	0	0	0	0	1	0	2	5	0.5
Hulcote & Salford	0	0	0	0	0	1	0	1	2	1	5	0.5
Husborne Crawley	0	0	0	0	-1	0	0	1	4	1	5	0.5
Chalton	3	0	0	1	0	0	0	0	0	0	4	0.4
Eggington	0	0	0	0	0	0	1	0	3	0	4	0.4
Meppershall	3	0	0	0	0	0	0	0	0	0	3	0.3
Slip End	0	1	-1	1	0	0	0	1	0	1	3	0.3
Dunton	0	1	0	1	0	0	0	0	0	0	2	0.2
Fairfield	0	0	0	0	0	0	1	0	0	1	2	0.2
Haynes	0	1	0	0	0	0	1	-1	-2	3	2	0.2
Millbrook	0	0	0	0	0	0	0	0	0	2	2	0.2
Milton Bryan	0	0	0	0	2	0	0	0	0	0	2	0.2
Potsgrove	0	0	0	0	0	2	0	0	0	0	2	0.2

Windfall by parish	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	Total dwellings delivered (net)	Annual Average
Battlesden	0	0	0	0	0	0	1	0	0	0	1	0.1
Campton/chicksands	0	0	0	0	0	0	1	0	0	0	1	0.1
Chalgrave	0	0	1	0	0	0	0	0	0	0	1	0.1
Edworth	0	1	0	0	0	0	0	0	0	0	1	0.1
Everton	0	0	0	0	1	0	0	0	0	0	1	0.1
Sundon	0	0	0	0	0	0	0	0	1	0	1	0.1
Sutton	0	0	0	0	0	0	0	1	0	0	1	0.1
Totternhoe	0	0	0	0	0	0	0	0	0	0	0	0
Whipsnade	0	0	0	-1	0	0	0	0	1	0	0	0