

Housing Windfall Assessment April 2024

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1 Introduction

- 1.1 Paragraph 72 of the NPPF (December 2023) states that local planning authorities may make an allowance for windfall sites as part of anticipated supply as long as any allowance is realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 1.2 National Planning Practice Guidance¹ goes on to state 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.
- 1.3 The City Council have therefore sought to consider and assess the historic windfall delivery rates, as well as expected future trends. From this it is then possible to estimate an expected level of windfall allowance to be included in its Housing Trajectory and to assist in the calculation of the Five Year Housing Land Supply.
- 1.4 To ensure there is no double counting within the projected housing figures for Chelmsford no sites within this windfall assessment are:
 - allocated sites within the adopted Local Plan.
 - within the SHELAA.
 - part of a residential garden.

2 Historic Windfall Completions

- 2.1 These are taken from the recorded completions within the Chelmsford City Council area for the last twelve years from sites which are unallocated within any of the previously adopted Development Plan Documents or within the new Local Plan, are not within the SHELAA, and do not form part of a residential garden.
- 2.2 The last twelve years have been used as this is since the City Council took over its monitoring function and can demonstrate a reliable baseline. A summary of the numbers of units completed per annum are included in Table 1 below:

¹ Housing and economic land availability assessment, 22 July 2019.

Table 1: Historic Windfall Completions

Year	Total Number of Windfall Completions		Number of which were completed on small sites ²
2012/13	139		114
2013/14	274	-130 Hayes Leisure Park ³ = 144	144
2014/15	277	-150 Hayes Leisure Park = 127	127
2015/16	178		175
2016/17	347		343
2017/18	358		358
2018/19	227		209
2019/20	197		181
2020/21	134		129
2021/22	104		104
2022/23	198		198
2023/24	204		203
TOTAL	2637	2357 (with Hayes deductions)	
Average per annum	220	196 (with Hayes deductions)	

3 Projected Windfall Completions

- 3.1 These figures are taken from sites with approved planning permissions, but which have not yet been recorded as being completed within the projected Housing Site Schedule, which are unallocated within the previously adopted Development Plan Document and the new Local Plan, are not within the SHELAA, and which do not form part of a residential garden.
- 3.2 A summary of the numbers of units projected per annum are included in Table 2 below:

² Sites no larger than 1 hectare

³ This deduction relates to the approvals to regularise the permanent occupation of park homes at Hayes Leisure Park, Hayes Chase, Battlesbridge, Essex – see paragraph 4.1

Table 2: Projected Windfall Completions

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)
2024/25	292
2025/26	177
2026/27	110
2027/28	26
2028/29	33
2029/30	0
2030/31	60
2031/32	0
2032/33	0
2033/34	0
2034/35	0
2035/36	0
TOTAL	698

3.2 The figures in Table 1 and Table 2 use the same April baseline date to ensure there is no double counting.

4 Windfall Assessment for inclusion in Five Year Housing Land Supply

4.1 The City Council has seen an average completion rate for windfall sites of 220 dwellings per annum for the last twelve years. However, it is acknowledged that in years 13/14 and 14/15, 130 and 150 units came about from the regularising of park homes being permanently occupied at Hayes Leisure Park. These figures could be considered as an anomaly and figures which are unlikely to be seen within a 'normal' year. Although these are technically 'windfalls' and could legitimately be included within an assessment the City Council does not seek to rely upon them in its calculation of future windfall projections. With these figures removed the historic average completions per annum amounts to 196 units.

4.2 There are a further 698 dwellings which have planning permission on sites defined as windfall sites within the City Council's Housing Site Schedule, but which are yet to be completed. 638 of these appear in the first five years of the Schedule. Over these five years this equates to an average projected completion rate of approximately 128 windfall dwellings per annum.

- 4.3 It is considered that the windfall projections for the first three years in the Housing Site Schedule are likely to be reasonably accurate and limited additions will come forward in these years, owing to the need to commence planning permissions within three years. However, years four and five are likely to see an increase as further (currently unknown) planning permissions on windfall sites are approved each year. It is therefore considered appropriate to add further projected windfalls to these two years.
- 4.4 On the basis of the data available to the City Council it is considered reasonable to make up the windfall allowance to 196 dwellings per annum for the years 2027/28 and 2029/29 within the April 2024 Housing Trajectory as illustrated in Table 3. This is based on the 196 average historic windfall completions seen over the last ten years (excluding the numbers seen at Hayes Park).

Table 3: Projected Windfall Completions with windfall allowance added to 5 Year Housing Supply

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)	Figure to be added to five year Housing Supply to make up projected windfall allowance of 196 per annum
2024/25	292	0
2025/26	177	0
2026/27	110	0
2027/28	26	170
2028/29	33	163
TOTALS	638	333

- 4.5 It is therefore considered that the Council can demonstrate that this number of windfall completions have consistently become available in the local area (through past completion records) and will continue to provide a reliable source of supply (based on the April 2024 Housing Site Schedule of windfall sites with planning permission).
- 4.6 This figure of 196 will be reviewed annually, along with the Housing Trajectory and Housing Site Schedule, to ensure that any projections for inclusion in the calculation of the City Council's Five Year Housing Land Supply are based on the most up to date information available to accurately reflect the likely position in Chelmsford in relation to projected windfall completion rates over the five year period.

5. Windfall Assessment for inclusion beyond Year Five of the Housing Trajectory

- 5.1 Based on the historic evidence for windfall completions and future windfall projections there is compelling evidence to support 196 dwellings per annum for years one to five in the Council’s Housing Trajectory.
- 5.2 Given the unpredictability of supply and completion rates over a longer period the City Council have used a reduced rate of 100 dwellings per annum beyond year five until 2040/41 of the Housing Trajectory.
- 5.3 It is considered that based on the average historic completion rate being consistently above 100 per annum, and the short-term projections being accurately projected at 196 per annum this figure is a robust projection. It is therefore considered that 100 dwellings per annum is a conservative figure which can be relied upon for the longer-term future projections for windfalls.

Table 4: Projected Windfall Completions with windfall allowance added to years 2029/30 to 2040/41 of the Housing Trajectory

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)	Figure to be added to Housing Trajectory to make up projected windfall allowance of 100 per annum
2029/30	0	100
2030/31	60	40
2031/32	0	100
2032/33	0	100
2033/34	0	100
2034/35	0	100
2035/36	0	100
2036/37	0	100
2037/38	0	100
2038/39	0	100
2039/40	0	100
2040/41	0	100
TOTAL	60	1140