

BUILDING

A BETTER FUTURE

Windfall Housing Development Analysis

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1. Introduction

- 1.1 The purpose of this windfall paper is to provide an up-to-date, robust assessment of the Borough's windfall allowance. It takes into account advice on windfall development in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). This paper provides evidence and justification for the inclusion of a windfall allowance as part of the housing trajectory for the Council's Building a Better Future Plan.
- 1.2 The 2024 National Planning Policy Framework (NPPF) defines windfall sites as:

"Sites not specifically identified in the development plan."
- 1.3 Paragraph 75 of the 2024 NPPF goes onto state:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends."
- 1.4 This paper provides an evidence-based approach to the anticipated windfall allowance based on past delivery trends, with the application of reasonable assumptions to ensure the resulting figures are appropriate, justified and not overly optimistic.
- 1.5 This paper includes to analysis of completions since 2013/14 to take account of the rolling nature of windfall projections and the Council's approach of excluding windfall development prior to year 3 of the plan period.

2. Methodology

- 2.1 The estimated rate of windfall development is based on past completion rates, using the detailed net housing completion figures provided by Hampshire County Council as part of its annual monitoring undertaken on the behalf of Havant Borough Council. This includes information on the location and type of development, as well as the detailed planning application description.
- 2.2 The analysis of past trends covers the period from 1st April 2013 to 31st March 2024. This means there is ten years of reliable and comprehensive completions data which has been analysed. This period of 10 years is considered to be an appropriate period to provide a realistic projection spanning across at least one economic cycle.
- 2.3 Reflecting the emerging development strategy, an additional stage of analysis was undertaken. This reflects the key principles in the development strategy including ensuring that development has no unacceptable impacts on international, national or local environmental designations, or national landscape designations; in addition to the presumption against new housing in areas that are at risk of flooding, now or in the future. As a result, Hampshire County Council ran a separate report on net housing completions outside of the following designations (the 'study area'):
 - International, national and local nature conservation sites¹
 - Chichester Harbour Area of Outstanding Natural Beauty (National Landscape)
 - Current and future flood risk zones
- 2.4 Any completions on allocation sites or were previously proposed as an allocation in the previous local plan² were excluded from the analysis.
- 2.5 To further ensure a cautious approach when calculating windfall projections, windfall delivery has been projected to commence from year 4 of the plan period. This is because it is assumed that prior to these dates, many of the likely housing completions will already be know through planning permissions, and as such are not therefore windfall development.

¹ Core and Primary Support Areas for Solent Waders and Brent Geese

² The emerging Havant Borough Local Plan was withdrawn from Examination in 2022: [Havant Borough Local Plan 2036 \(withdrawn Local Plan\) | Havant Borough Council](#)

3. Windfall Analysis

- 3.1 The following analysis sets out the total number of completions Borough wide, alongside the number of windfall completions (excluding allocations). This is presented alongside the total number of past completions and windfall within the study area to provide a realistic windfall projection for the Building a Better Future Plan period.

Year	Total Borough completions	Total Borough completions within study area	Windfall total	Windfall total within study area
2013-14	200	185	51	43
2014-15	489	368	81	79
2015-16	584	400	53	42
2016-17	649	562	319	259
2017-18	290	243	112	68
2018-19	267	229	127	118
2019-20	366	261	158	149
2020-21	294	260	92	58
2021-22	259	179	62	29
2022-23	495	364	298	56
2023-24	368	174	83	41
Total	4261	3225	1436	942
Average	426	323	144	94
Discount by 10%				85 dwellings per annum

- 3.2 Based on the above table, windfall has averaged 94 dwellings per year. To ensure the windfall projection going forward is realistic, a 10% reduction is applied. This results in a total of **85 dwellings per annum**.
- 3.3 This level of projected housing delivery will be regularly monitored by the Council to ensure the housing delivery projections are kept up to date.

4. Conclusion

- 4.1 The above analysis demonstrates a compelling case for the inclusion of a windfall allowance in Havant Borough's housing land supply. Windfall sites have historically made a consistent contribution to the overall housing delivery in the area and are likely to continue to do so. Based on the analysis within this paper, there is projected to be a windfall development total of **85 dwellings per annum** from year 3 of the plan period.
- 4.2 As this consistent supply is clearly apparent, if windfall allowance was not included in the housing land supply, this would lead to an under-estimate of housing delivery in the Borough.



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