

Windfall Update Technical Paper 2022

Index

1.	Introduction	3
2.	Policy Context	4
	NPPF windfall definition	4
	CYC windfall definition	4
3.	Analysis of Windfalls in the City of York	5
	Historic windfall delivery and trends experienced in York’s housing market	5
4.	Future Windfall Approach in the Local Plan	15
	Calculating an appropriate windfall allowance	15
	Timescale used to provide historic windfall evidence	15
	Threshold and type of windfall to be included	16
	Windfall trend analysis	17
	When should windfalls appear in the housing trajectory	23
	Windfall allowance years 1-5	23
	Windfall allowance years 6-15	24
	Level of windfalls to be included in future housing projections	25
	Applying a discount to future windfall allowance	26
	Risks involved in including a windfall projection	27
5.		28
6.	Conclusions	
	Annexes	29
	Annex 1: Risk Analysis	29
	Annex 2: Windfall Trend Analysis	33
	Annex 3: Preferred Sites Consultation Comments and Responses	47

1 Introduction

- 1.1 In addition to our previous Windfall Allowance Technical Papers that formed part of the evidence base to support the City of York Local Plan through consultation, this paper updates our evidence base to 1st April 2022, reflecting monitoring data for the year 1st April 2021 – 31st March 2022. It was considered convenient to present this as a revision to the paper, rather than as a series of amendments to be read against the existing paper. There is no change to the methodology and the only textual amendments reflect changes to the figures.
- 1.2 This update has been prepared to aid discussion as to whether the City of York Council has sufficient reliable evidence to justify the inclusion of a qualified windfall allowance within the calculation of the five-year housing land supply, and over the longer Plan period up to 2033.
- 1.3 A summary of comments made to the Windfall Technical Paper during previous consultation exercises on the Draft Local Plan have been included in Annex 3. This takes account of representation made as a result of the City of York Local Plan Publication Draft (Regulation 19 Consultation) (February 2018) together with those received through the Proposed Modifications Consultation (June 2019) and a considered response to the issues raised has been provided.
- 1.4 Where appropriate, reference is made to our previous Technical Papers to ensure this update is concise whilst it also aligns with current national policy and guidance.

2 Policy Context

NPPF Windfall Definition

- 2.1 As the City of York Local Plan is being examined under the transitional arrangements set out in Annex 1 to the revised National Planning Policy Framework, the policies in the previous version of the framework published in 2012 will continue to apply, as will any previous guidance which has been superseded since the new framework was published in July 2018.
- 2.2 Paragraph 48 of the 2012 NPPF and revision note to the NPPG of March 2014 provides clarity on the appropriateness in the use of windfalls, whilst paragraphs 2.1 to 2.5 of the City of York Council Local Plan Windfall Allowance Technical Paper (July 2016) expands on these details. (See link below)

https://www.york.gov.uk/downloads/file/11252/windfall_allowance_technical_paper_2016

- 2.3 The Revised National Planning Policy Framework (NPPF) of February 2019 and National Planning Policy Guidance (NPPG) both provide direction on what constitutes a windfall and when it is appropriate to include an allowance within the future housing supply trajectory. However, as explained in paragraph 2.1, above, neither contemporary national policy nor guidance can be used in evidence based documents in our Plan whilst under examination.

City of York Windfall Definition

- 2.4 Consistent with our earlier technical papers' windfall definition we have excluded all previously identified sites from our analysis and removed all historic garden infill sites. We have included changes of use brought about through relaxed permitted development rights (now made permanent), also known as 'prior approval' sites along with completions resulting from un-allocated off-campus privately managed student accommodation completions. Both Brownfield and Greenfield unidentified windfall sites are included within our calculations. A full explanation of this definition is included in paragraphs 2.7 to 2.12 of our earlier 2016 Technical Paper and can be viewed via the link provided below.

https://www.york.gov.uk/downloads/file/11252/windfall_allowance_technical_paper_2016

3 Analysis of Windfalls in the City of York

Historic Windfall Delivery and Trends Experienced in York's Housing Market

- 3.1 Analysis of our historic housing completion figures indicates that a considerable element of York's housing supply has been provided through un-identified windfall sites.
- 3.2 Table 1, below, shows that of the 6,761 net additional homes built in York during the last 10 years (2012-2022), a total of 3,002 homes have resulted from completions on windfall sites and represents over 44% of all completions over that period.
- 3.3 During years 2012/13 to 2014/15 the proportion of housing through windfalls was at levels well below the average of 300.2 per annum. However, during both the 2015/16 and 2016/17 monitoring years the largest numbers of windfall completions were experienced (1,166). The smallest proportion of homes completed through windfall (23.77%) took place in 2017/18, however, with 308 completions this represented an above average total. The greatest proportion of windfall completions was experienced in 2020/21 when 78.78% of the housing supply was completed through windfall, bettering the 57.98% achieved in 2015/16.

Table 1: Historic Annual Windfall Completions

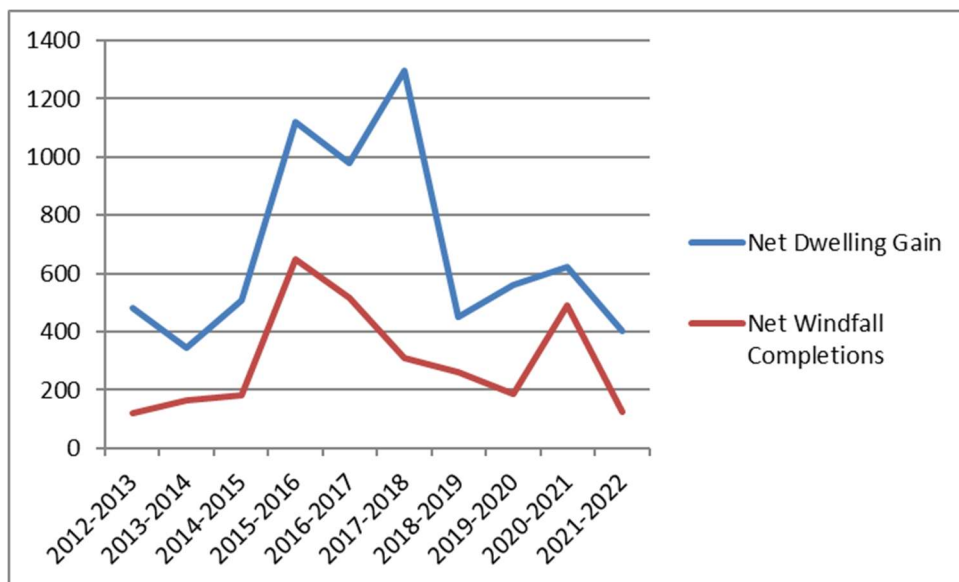
Year	Net Dwelling Gain	Net Windfall Completions	Proportion of Windfalls as a % of Overall Completions
2012-2013	482	122	25.31%
2013-2014	345	164	47.54%
2014-2015	507	182	35.90%
2015-2016	1121	650	57.98%
2016-2017	977	516	52.81%
2017-2018	1296	308	23.77%
2018-2019	449	260	57.91%
2019-2020	560	187	33.39%
2020-2021	622	490	78.78%
2021-2022	402	123	30.60%
2012-2022	6761	3002	44.40%

- 3.4 Graph 1 below shows how windfalls have generally mirrored overall trends of housing completions over the last ten years

reflecting both periods of growth and recession. This has generally been true other than during 2017/18 that saw significant levels of housing development on allocated sites with 958¹ homes resulting from this source – none of which, by definition, can be counted as windfalls.

3.5 It should be noted that York has not had an adopted plan for the ten year monitoring period or an agreed objectively assessed housing need (OAHN). Similar high windfall levels may not continue in the future years if sites are identified early in the planning process via Strategic Housing Land Availability Assessments (SHLAAs) and recognised processes resulting in their allocation. This uncertainty should be taken into account in any qualified windfall projections.

Graph 1: Historic Housing Completions Compared to Windfall Completions



3.6 This is especially true in the case of **sites above 0.2 ha**, the threshold used to assess for the allocation of sites. This threshold has been used in both the ‘call for sites’ and SHLAAs that have assisted in identifying suitable draft housing allocations.

3.7 In general other Local Authorities use a larger threshold of around 0.4 ha for site identification within their urban capacity studies. City of York Council has adopted 0.2 ha as its threshold, which

¹ The most significant allocated sites providing homes during 2017/18 were; St Joseph’s Convent, Lawrence Street (526) Hungate (195) Former Terry’s Factory Site Bishopthorpe Road (88) and Former Grain Stores Water Lane (82)

recognises that the supply of housing from this type of site has provided a significant contribution to past housing completions. Using a lower threshold will help to identify more sites as allocations and should theoretically reduce the number of unidentified windfall sites coming forward in the future housing supply.

- 3.8 Using the last ten year monitoring period to estimate the future supply of windfall delivery should ensure that neither an overly optimistic nor pessimistic projection for windfalls will be applied. As this document updates our previous technical papers with the inclusion of our 2021/22 completions it reflects the most recent market trends to ensure the most robust evidence base has been used.
- 3.9 Historic housing windfall rates for the entirety of City of York Council area have been recorded for a number of years and form a subset of the housing completions figures that have appeared within our previous Annual Monitoring Reports. The tables provided below provide evidence of historic windfall completions based on size of site and type, and have been compared against overall housing completion figures by way of context.
- 3.10 All past completions that appear in the tables have been based on;
- Development Management housing consents – a record of decisions on planning applications is updated monthly
 - Completions returns provided by our Building Control team
 - Site visits carried out on a 6 monthly basis to check completions
 - Contact with applicants, developers and agents at regular intervals to confirm both completion and predicted completion levels, and
 - Monitoring of extant consents, new permissions and inclusion of development given lawful use through certificates of lawful development (previously not included within housing returns).
 - Council tax records
- 3.11 Table 2 below provides details of the number of housing windfall completions over the ten year period from April 2012 to March 2022, split by size and type. It should be noted that two of the main contributors to net additions to the housing windfall supply over that period came from conversions (inclusive of changes of use) with 1,493 and from sites below 0.2 hectares (very small windfall

sites) with 500. These totals are significant in as much as they fall outside the threshold used to identify potential housing allocation sites in our emerging Local Plan and will not be identified in future years.

3.12 This analysis of previous windfalls is carried out using the following categories;-

- **Very small windfalls** – on sites less than 0.2 hectares
- **Small windfalls** – on sites between 0.2 and 0.4 hectares
- **Medium windfalls** – on sites between 0.4 and 1.0 hectares
- **Large windfalls** – on sites over 1.0 hectares
- **Windfalls resulting from changes of use to residential properties and conversions to existing residential units**

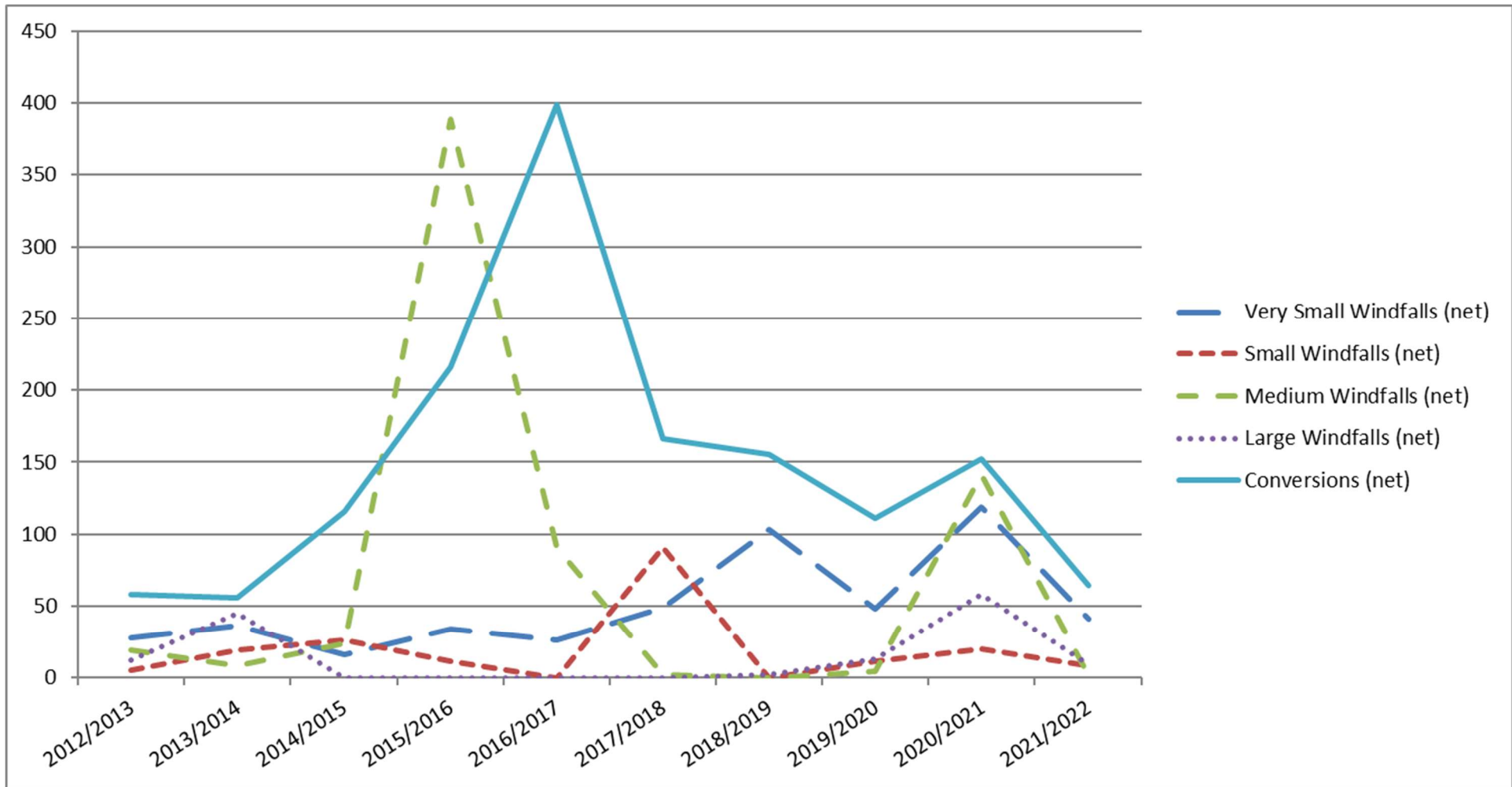
Table 2: Historic Annual Windfall Completions Separated into Size and Type

Year	Very Small Windfalls (net)	Small Windfalls (net)	Medium Windfalls (net)	Large Windfalls (net)	Conversions (net)	Total (net)
2012/2013	28	5	19	12	58	122
2013/2014	36	19	8	45	56	164
2014/2015	16	26	24	0	116	182
2015/2016	34	11	389	0	216	650
2016/2017	26	0	91	0	399	516
2017/2018	49	91	2	0	166	308
2018/2019	103	0	0	2	155	260
2019/2020	48	11	4	13	111	187
2020/2021	119	20	141	58	152	490
2021/2022	41	8	1	9	64	123
Totals 12-22	500	191	679	139	1493	3002

3.13 Both Table 2 and Graph 2 provide a complete picture of the overall levels of windfall completions over the last ten years.

3.14 Graph 2 displays the fluctuations experienced in past windfall supply. It shows that on sites over 0.2 ha significant variations have taken place. By comparison sites below 0.2 ha and completions resulting from changes of use and conversions to existing homes vary less (other than in 2016/17 when 399 homes from conversions and change of use were completed) and have

provided a relatively constant source of new homes over the monitoring period.



Graph 2: Illustration of Historic Annual Windfall Completions by Size and Type

3.15 Some of the more significant completions making up these variations were carried out within the windfall categories resulted from the following:

- In 2015/16 a total of 389 homes were provided on medium sized sites, these arising from the student accommodation completed at the Old Yorkshire Evening Press Site, 76-86 Walmgate (361 homes) and the retirement homes completed on the former Fox & Hounds, Copmanthorpe (28 homes).
- 2015/16 also experienced significant levels of windfall completions through changes of use. Holgate Villa (50) 3 Pioneer Business Park (19) and Matmer House, Hull Road (14) being the three largest contributors in this category.
- In 2016/17 a total of 399 net new homes resulted from conversions or changes of use and of this number 252 homes came about through sites benefitting from 'prior approval'. United House, Piccadilly (119) Castle Chambers, 7-13 Clifford Street (25), the William Birch & Sons Ltd former offices in Foss Place, Foss Islands Road (24) were the largest contributors within this category.
- During 2016/17 61 student accommodation units resulted from the change of use of 2-14 George Hudson Street.
- In 2017/18, a total of 89 new student flats were completed at St Lawrence WMC, 29-33 Lawrence Street on a small site (the scheme also resulted in a total of 19 net new flats as part of the change of use to the original structure)
- 2018/19 saw a rise in completions on sites of below 0.2 ha with 103 homes resulting from this source. Of this total 38 student flats were completed at the former Herbert Todd & Son land at Percy Lane, whilst a further 34 over 55's homes have been constructed at the former Oliver House site in Bishophill Junior.
- 61 sites provided 155 homes resulting from changes of use and conversion of residential properties during 2018/19. Of this total, 3 sites benefitting from prior approval (relaxed planning rules allowing conversion of office buildings) resulted in 27 new

homes², whilst the change of use to both Rowntree Wharf (25) and Former London's Toy Shop in Hawthorne Grove (10) made significant contributions within this category.

- During the 2019/20 monitoring year the largest contributions to windfall completions resulted from the changes of use and conversions category with a net total of 111 additional homes delivered on 45 sites, the most significant development being 17 student flats at the Fleeting Arms, Gillygate. Whilst a further 48 net new homes were completed on sites below 0.2ha with 21 student flats at the Coal Yard site in Mansfield Street and 14 dwellings at the former Fire Station, 18 Clifford Street being the most significant contributors to the housing supply within this subset.
- 2020/21 saw the highest level of net completions on sites below 0.2 ha with 119 homes – the most significant contributors to this number being 32 flats at 1 Redeness Street, a further 19 student 'cluster' flats at 11 Redeness Street, and 14 homes each provided at the site to the rear of 33 Bootham, Thomas Dick Ltd site on Hallfield Road and North Lodge re-development site on Clifton Park Avenue.
- A further 152 homes were created in 2020/21 through conversion and change of use – the largest of which were carried out at Ryedale House (77) and Shepherd Engineering Services, Mill Mount (22)

3.16 Sites over 0.2 ha are shown to display more significant and varied levels of annual completions and greater ranges within the totals making any future trends more difficult to predict. As explained earlier these types of site are more likely to be identified in future years and, therefore, assessed as potential allocations. If a site, following full assessment is deemed appropriate for housing development and subsequently allocated it then falls outside the definition of windfalls.

3.17 A further breakdown of the windfall completion figures, as displayed in Table 3 below, highlights that over 66% of all windfall completions during the past 10 years took place either on very

² Stonebow House, Diocese House (Aviator Court) and British Red Cross (Marsden Park) saw 13, 10 and 4 completions respectively during the monitoring period.

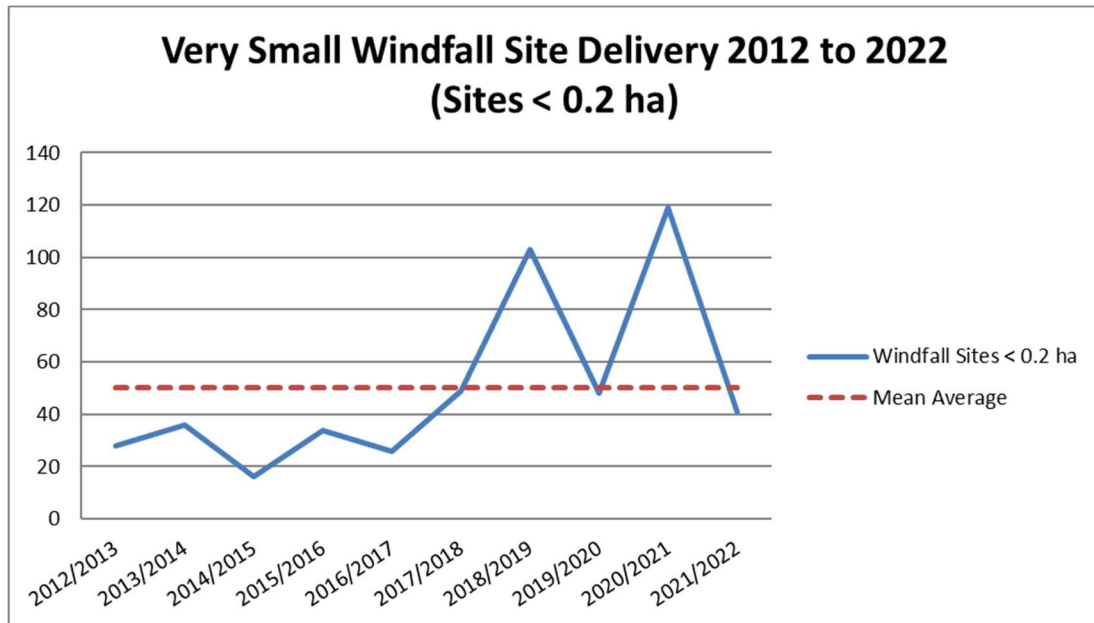
small sites below 0.2 ha or through changes of use to residential properties and conversion of existing homes. Neither of this type of site is likely to be picked up in housing land assessments and is, therefore, more appropriate for use in potential future windfall projections.

Table 3: Breakdown of Windfall Completions by Size and Type

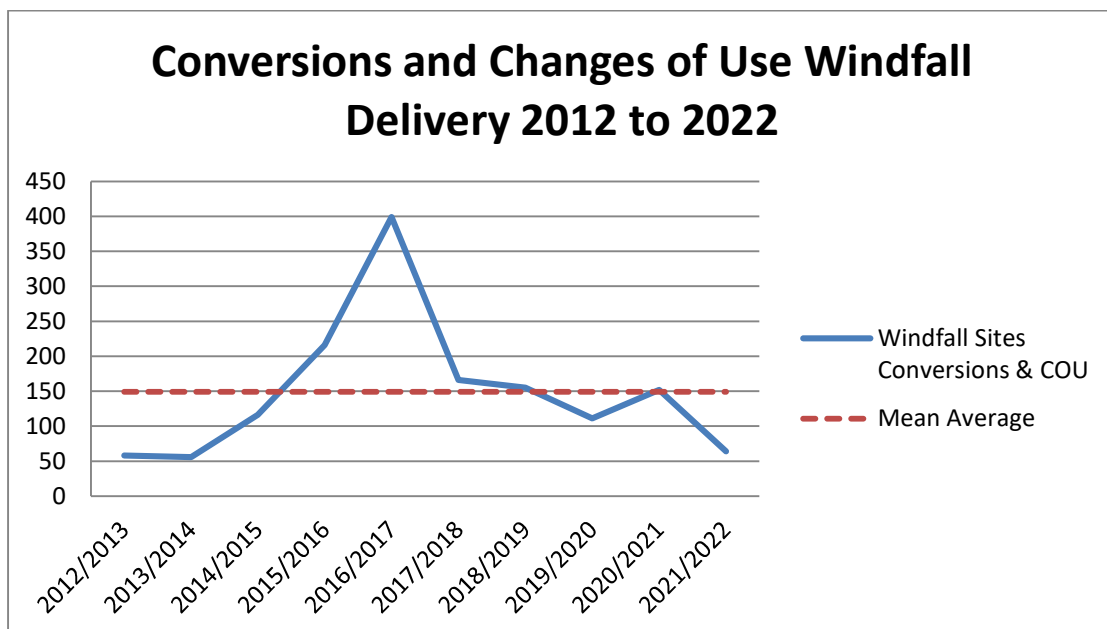
Size/Type of Windfall	Ten Year Total	Ten Year Mean Average	Windfall Types Represented as a Proportion of Total Windfalls (%)
Very Small Windfalls (Less than 0.2 ha)	500	50.0	16.66%
Small Windfalls (0.2 - 0.4 ha)	191	19.1	6.36%
Medium Windfalls (0.4 - 1.0 ha)	679	67.9	22.62%
Large Windfalls (> 1.0 ha)	139	13.9	4.63%
Conversions/COU	1493	149.3	49.73%
Totals	3002	300.2	100.00%

- 3.18 Graphs 3 and 4 below show a representation of the last 10 years of windfall sites of less than 0.2 ha and conversions and changes of use. Both graphs display the range between the highest and lowest completion years.
- 3.19 For sites below 0.2ha housing completions reached 119 during 2020/21, the highest level achieved within this category over the ten year monitoring period. Other than for monitoring years 2018/19 and 2020/21 completions from this type of site have generally remained stable over the 10 year analysis period.
- 3.20 Completions through change of use and conversions of existing properties increased significantly in 2015/16 when over 200 new homes were created and almost 400 further homes coming from this category in 2016/17. This spike in delivery can be associated with the relaxation of permitted development rights introduced by central government in 2013. These ‘prior approval’ sites have become a continued source of supply following the relaxation of rights that have now been made permanent. Since 2017/18 there has been a drop in completions from this source. However, 216 net new homes have been provided in this category over the last two years despite the impact Covid-19 has had on working practices and, therefore, continues to provide a significant supply of homes within the authority area.

Graph 3: Very Small Windfall Site Completions



Graph 4: Conversion & Changes of Use Windfall Site Completions



4 Future Windfall Approach in the Local Plan

Calculating an Appropriate Windfall Allowance

4.1 A number of factors need to be considered before determining a realistic housing windfall allowance. The following issues are highlighted within this part of the paper before setting our proposed approach to windfalls. These include;

- An appropriate timescale for historic windfall evidence;
- The threshold and type of windfall to be included;
- Trend analysis and the appropriate trend timescale to be used to ensure market conditions are reflected appropriately;
- When windfalls should appear in the housing trajectory;
- What level of windfalls should be applied to future housing projections;
- Should discount rates be applied to future windfall allowances; and
- What risks are there in including windfalls within a future housing land supply?

Timescale Used to Provide Historic Windfall Evidence

4.2 The timescale for analysing historic windfall completions has been considered. Following a review of other local authority windfall papers, the use of the last ten years' figures is considered to be most appropriate, particularly as this period includes a wide range of market conditions.

4.3 Longer periods of historic completions records have been used in some authority windfall completions analysis whilst less reference shorter historic records. The advantage of using a 10 year trend ensures that the full cycle of market conditions that have taken place during that time should ensure that neither an overly optimistic or pessimistic projection for windfalls will be applied. A rolling 10 year windfall trend incorporated annually within the housing trajectory will ensure that any upturn or decrease in supply will be taken into account within future windfall allowances. By using a longer historic record this fluctuation could be lost within a larger dataset.

Threshold and Type of Windfall to be Included

- 4.4 Research reveals that other planning authorities have set varying thresholds when considering what type of windfall site should be included within any allowance in future years. These have broadly been based on either capacity (potential number of homes that have been developed on individual sites, often set at 10 or more dwellings) or simply a size of site threshold.
- 4.5 City of York Council does not view a capacity threshold as providing the most meaningful approach to identifying sites. Site location tends to influence the number of acceptable homes appropriate for each site, and individual site constraints may affect capacity of each site. Over time this could result in similar sites being included within the figures or excluded elsewhere dependant on the location and changing market circumstances. These characteristics are difficult to monitor and can provide unbalanced evidence.
- 4.6 A size threshold, often of around 0.4 ha, has been used by a number of authority areas in analysing past windfall performance. This aligns with their SHLAA thresholds used in identifying potential future allocations.
- 4.7 Preference in York is for a size threshold of 0.2 ha throughout the authority area in our analysis of windfalls, and this accords with that set within the 'call for sites' to support the Local Plan. Use of this size threshold should help to capture more sizeable sites for potential housing allocations compared to a greater size threshold, and decrease the number of unidentified windfall sites coming forward in the future housing supply. Therefore, it is reasonable to assume that a qualified allowance for this type of development can be made in the future housing land supply.
- 4.8 Although we have recorded windfalls above the 0.2 ha threshold we do not intend to project forward an allowance for this type of site within the future housing supply for a number of reasons:
- The monitoring period covers a time in which we did not have a formally adopted development plan in place. Therefore, sites of this nature have not previously been identified as allocations. With a comprehensive Local Plan that includes identified site allocations for a full 15 year trajectory and regular SHLAAs

planned over the future years we expect to capture these sites as allocations rather than windfall sites.

- As can be seen from the graphs showing past delivery of this type of site, evidence reveals that the supply of housing from these sites is less predictable in the delivery of housing and projecting forward these rates could prove to be unreliable.

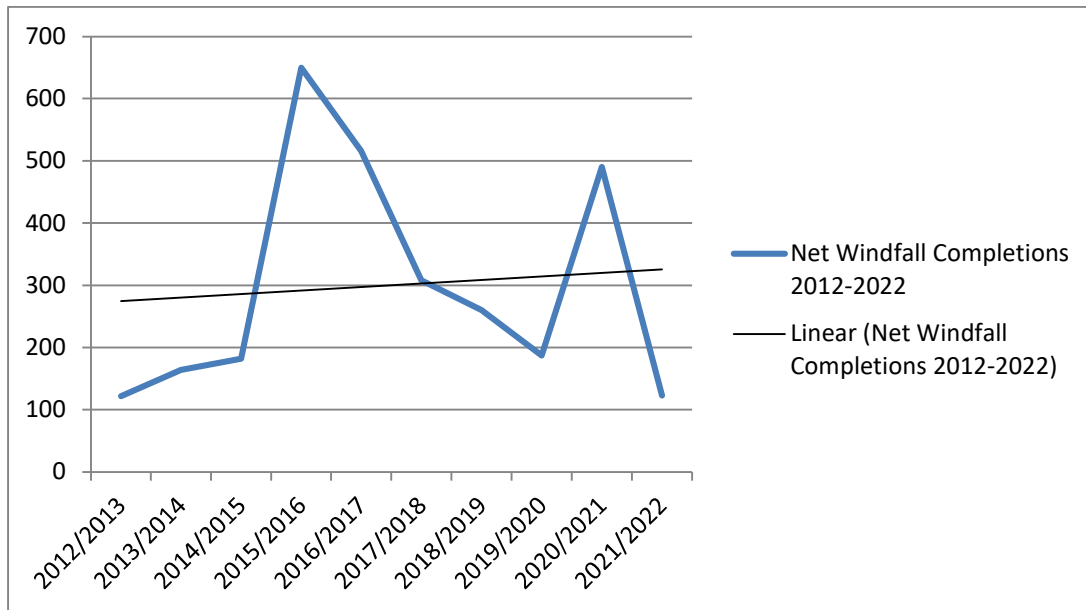
4.9 Changes of use and conversions of existing residential dwellings have delivered a steady and reliable source of housing in York throughout the monitoring period, even during recessionary times. This supply is likely to continue as a result of the announcement that the temporary measures introduced in 2013 to relax the permitted development rights, relating to the conversion of offices to residential use, have now been made permanent. As consented conversions of this type are already included within the unimplemented housing permissions and therefore accounted for within the housing trajectory, no increase in the rate of this type of windfall is proposed. However, future monitoring will take account of any variations and appropriate allowances will be made accordingly throughout the plan period.

Windfall Trend Analysis

4.10 A relatively simple method for estimating a general trend in a set of data is to add a linear trend line to a chart. A trend line is similar to the line used to show results within a chart, but it doesn't connect each data point precisely as a line chart does. A trend line takes account of all the data meaning that minor exceptions or statistical anomalies will not distort the output. In some circumstances the use of a trend line is an aid in forecasting future figures.

4.11 When applying a trend line to overall windfall completions carried out between 2012 and 2022 the overall linear trend indicates a slight increase in completions over the monitoring period (see Graph 5 below).

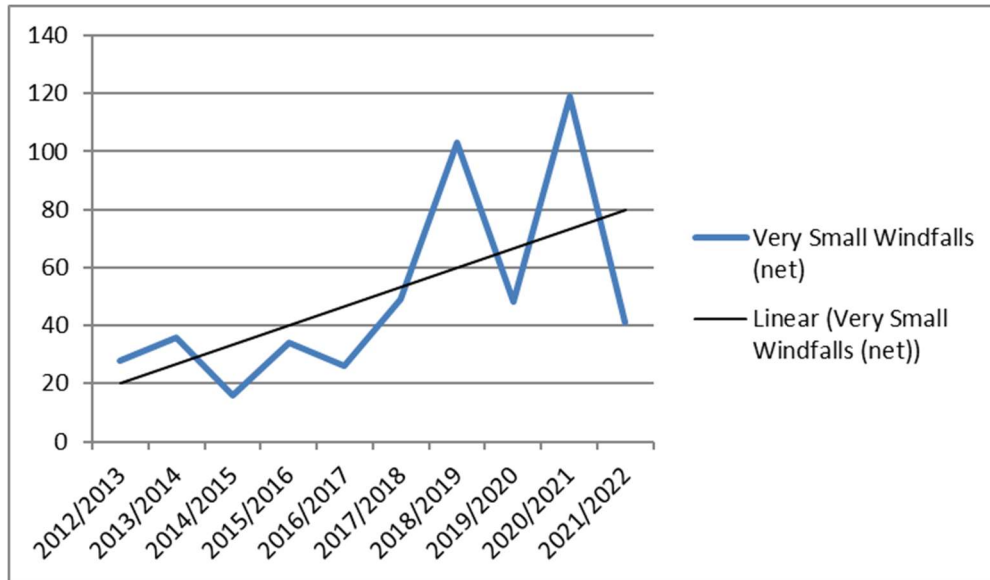
Graph 5: Net Windfall Completions 2012-2022



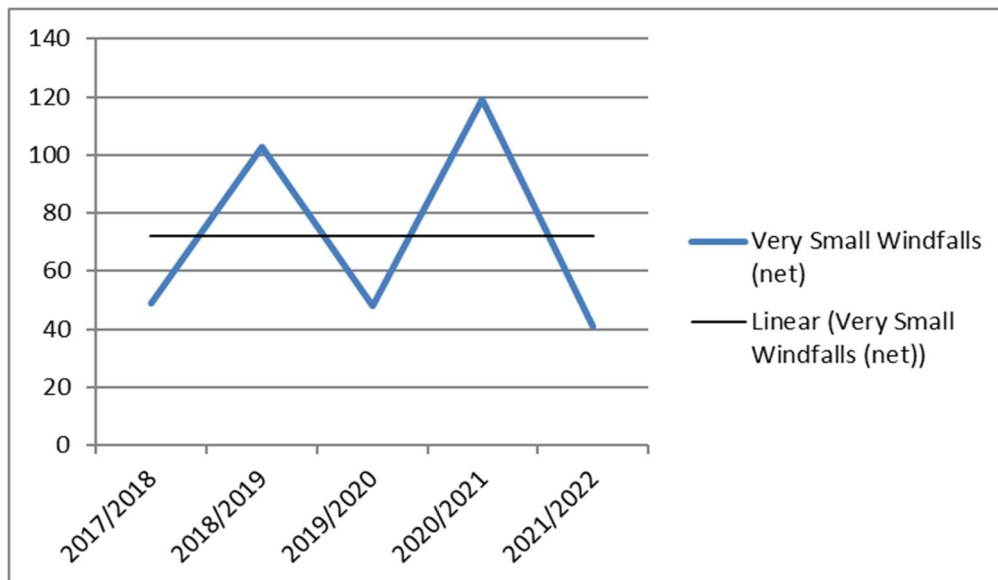
- 4.12 When we consider trend analysis of specific windfall rates we have included records for both the whole ten year monitoring period together with trends over the shorter term i.e. the last five years. In so doing we hope to pick up on any shorter term fluctuations being experienced within the housing market to confirm that appropriate estimations are being applied to projected windfall delivery.
- 4.13 Further evidence shows that, for the two windfall types we deem appropriate for inclusion within our projected future housing supply, the following characteristics are apparent.
- 4.14 Graphs 6 and 7 reveal that in terms of very small windfalls (sites below 0.2 ha) the ten year trend is one of improving numbers, with over 311 homes being built within this category over the last four monitoring years helping to set the trend (see paragraph 3.18 earlier in this paper for details). A levelling of the trend in completions from this source has taken place over the last 5 years which is understandable considering the impact the pandemic has had on the development industry over the last two years.
- 4.15 Conversions and changes of use completions (see Graphs 8 and 9) indicate a consistent if slightly increasing trend over the longer term. However, over the shorter 5 year period the trend has decreased and almost certainly has resulted from the impact of the pandemic and the wider materials shortages experienced globally. With the 'prior approval' regulations now being made permanent

and expanded further in the last year this source of future housing supply is anticipated to provide healthy levels of future housing completions when the market corrects itself after the effects of current adverse market conditions.

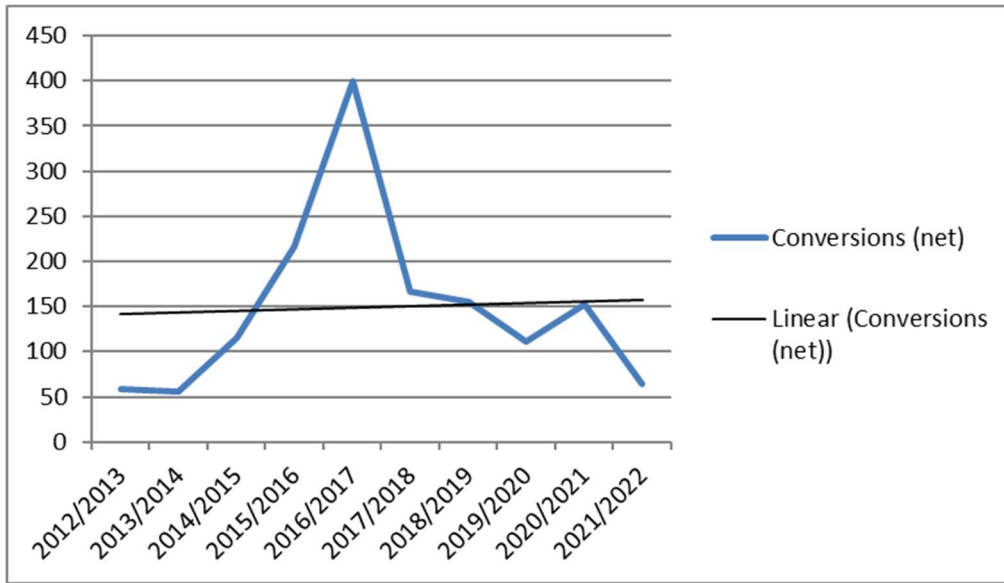
Graph 6: Net Very Small Windfall Completions 2012-2022 (Sites <0.2ha)



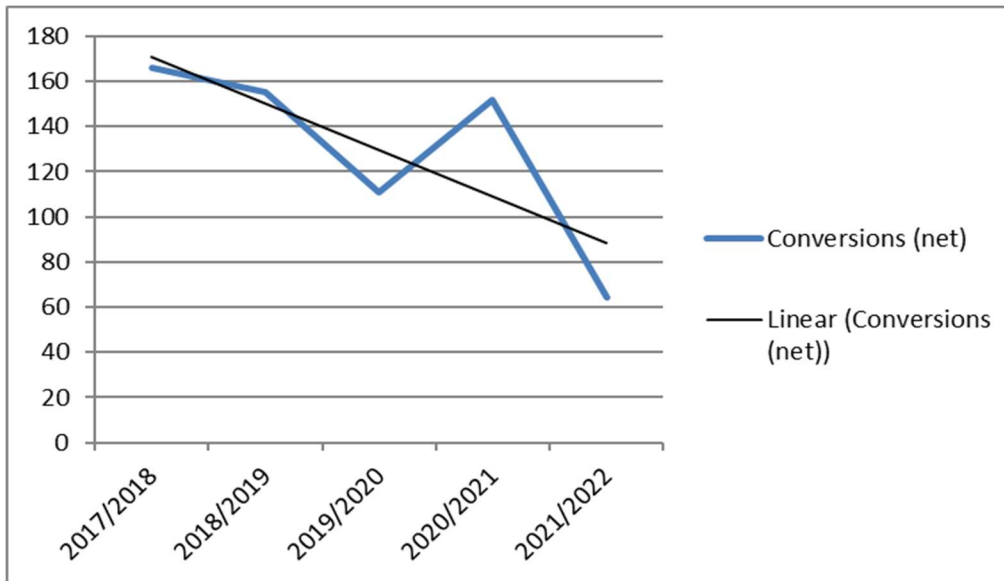
Graph 7: Net Very Small Windfall Completions 2017-2022 (Sites <0.2ha)



Graph 8: Net Conversions and Changes of Use Windfall Completions 2012-2022



Graph 9: Net Conversions and Changes of Use Windfall Completions 2017-2022



4.16 The following tables provide details of the trends associated with the different types of windfall over both the longer ten year and shorter five year historic monitoring periods.

Table 4: Combined Brownfield & Greenfield Windfall Completion Trends

Combined Brownfield and Greenfield Windfall Sites		
Type of Windfall	10 Year Trend	5 Year Trend
Very Small Sites (<0.2 ha)	↑	↔
Small Sites (0.2 to 0.4 ha)	↔	↓
Medium Sites (0.4 to 1.0 ha)	↓	↑
Large Sites (>1.0 ha)	↑	↑
Conversions and Changes of Use	↔	↓
All Brownfield/Greenfield Windfalls	↑	↓

Key

Decrease	↓
No Significant Change	↔
Increase	↑

The following tables (5 and 6) provide a breakdown of the preceding table's trends according to their type, whether greenfield or brownfield

Table 5: Brownfield Windfall Completion Trends

Brownfield Windfall Sites		
Type of Windfall	10 Year Trend	5 Year Trend
Very Small Sites (<0.2 ha)	↑	↑
Small Sites (0.2 to 0.4 ha)	↓	↓
Medium Sites (0.4 to 1.0 ha)	↔	↑
Large Sites (>1.0 ha)	↔	↑
Conversions and Changes of Use	↔	↓
All Brownfield Windfalls	↑	↓

Table 6: Greenfield Windfall Completion Trends

Greenfield Windfall Sites		
Type of Windfall	10 Year Trend	5 Year Trend
Very Small Sites (<0.2 ha)	↑	↓
Small Sites (0.2 to 0.4 ha)	↑	↑
Medium Sites (0.4 to 1.0 ha)	↓	↑
Large Sites (>1.0 ha)	N/A	N/A
Conversions and Changes of Use	↔	↓
All Greenfield Windfalls	↔	↔

- 4.17 Our trend monitoring shows that other than for medium sized sites all categories have experienced either a levelling out or show an upward trend in housing delivery over the longer, 10 year, monitoring period. However, following a general peak of windfall completions during both 2015/16 and 2016/17 the shorter 5 year trends there appears to be an even split of both increase and decline in supply, dependent upon the category. This reflects the impacts that the pandemic and material shortages have had during the shorter term on the house building industry.
- 4.18 Notably the type of windfall sites we intend to project forward within our housing trajectory such as those below 0.2ha show an upward delivery trend over the long term and a levelling out over the last five years, whilst completion levels through changes of use and conversions remain relatively high, even though falling over the previous 5 year monitoring period. This provides the required evidence to project forward at least a mean average of past performance within these categories of windfall sites within the housing trajectory.
- 4.19 The downward trend in completions through small sites seen over the last 5 years will not form part of our evidence to inform future windfall projections as these sites should form the identified allocations within the Local Plan.
- 4.20 For a complete record of windfall trends separated into Greenfield and Brownfield sites and the full range of categories analysed over the last five and ten year periods see Annex 2 of this document.

When should Windfalls appear in the Housing Trajectory?

4.21 Paragraph 48 of the National Planning Policy Framework (2012) advises that a Planning Authority may include a windfall allowance within the first five years of its housing trajectory provided that evidence supports their inclusion (see paragraphs 2.1 and 2.2 within this paper for full reference) and this can be extended to years 6-15 where an allowance can be made based on broad geographical areas. The following paragraphs describe our intended approach.

Windfall Allowance in Years 1-5 of the Housing Trajectory

4.22 Our unimplemented housing consents records reveal that from a total of 7,648 homes with consent there were 969 net additional homes with extant consent at 1st April 2022 on sites regarded as windfalls (see Table 7). Of this total 508 had gained consent on sites of less than 0.2 ha or could result from changes of use or conversions to existing dwellings. Further scrutiny of the data shows that within this number 114 net homes have approval as a result of 'prior approval', whilst a further 344 are student cluster flats that have gained approval on previously unidentified sites. All this evidence indicates that a continued supply of homes built on consented windfall sites should be maintained within the short term.

Table 7: Potential Windfall Sites with Extant Consent at 1st April 2022

Size/Type of Windfall	BF Sites	GF Sites	Total BF + GF	Windfall Types Represented as a Proportion of Total Windfalls (%)
Very Small Windfalls (Less than 0.2 ha)	225	8	233	24.05%
Small Windfalls (0.2 - 0.4 ha)	85	1	86	8.88%
Medium Windfalls (0.4 - 1.0 ha)	141	1	142	14.65%
Large Windfalls (> 1.0 ha)	232	1	233	24.05%
Conversions/COU	241	34	275	28.38%
Totals	924	45	969	100.00%

4.23 We do not consider it to be appropriate to include a windfall allowance within the first three years of the housing trajectory. This will provide an appropriate time scale for any applications on sites which would ultimately result in windfall completions to go through the development process. This timescale also allows for completions of windfalls with extant consent to be built out at

reasonable lead in times and, therefore, avoid double counting. The double counting of SHLAA sites and extant windfall consents within the allowance needs be avoided otherwise an over estimation of supply from this source would be deemed unsupportable during inspection of the Plan.

- 4.24 Phasing in a windfall allowance will provide more certainty in the early part of the trajectory and will avoid double counting. The estimation of housing supply will, therefore, be based on known consented development and anticipated delivery schedules provided by applicants/developers rather than relying on unidentified windfall sites providing homes in the early part of the Plan.
- 4.25 Consideration has also been given to an approach whereby windfalls were only to be accounted for beyond the first 5 years of the trajectory. Whilst this method would avoid any potential double counting and only rely on extant consents and identified draft allocations for completions in the 5 year housing supply, it would represent a very cautious view of windfall projections. Trend analysis shows that in general an increase in windfall completions within the categories to be projected forward has been evidenced in both the longer and short term. Further, with the relaxed permitted development rights now made permanent and expanded upon during the last year, and the consent analysis indicating that this type of development continues to come forward, it is highly likely that windfalls will continue to contribute significant levels of new housing in future years.

Windfall Allowance in Years 6-15 of the Housing Trajectory

- 4.26 The revision note to the NPPG of 6th March 2014 states;
- “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 National Planning Policy Framework)”
- 4.27 In terms of geographical area we have included all land contained within the City of York local authority boundary. This aligns with the assessment of housing market sub areas undertaken as part of

our Strategic Housing Market Assessment (SHMA) of June 2016 and Updated SHMA of September 2017.

4.28 As with years 4 and 5, a windfall allowance based on historic mean average completions of sites <0.2 ha together with conversions of existing dwellings and homes resulting from changes of use is to be used from year 6 of the housing trajectory. This projection of windfalls is deemed justified and appropriate, though it will continue to be monitored annually to reflect any market fluctuations and to ensure that a realistic estimate of future housing windfall supply is maintained throughout the Plan period.

The Level of Windfalls to be included in Future Housing Projections

4.29 In taking a proportionate approach to identifying land for development in the emerging Local Plan only sites above 0.2ha have been identified as draft allocations. To ensure that we properly understand the potential for development on very small sites below this allocation threshold an assessment of the trends in the historic rate of windfall delivery along with changes of use and conversions has been carried out.

4.30 It should be noted that this monitoring period covers a time in which York had no adopted development plan and, therefore, continued high levels of windfall supply are unlikely to be maintained over the plan period, especially in the case of larger windfall sites above 0.2 ha (the threshold used for the allocation of sites). This is important to note because the NPPF requires not just compelling evidence of historic windfall rates but also evidence of expected future trends in order to justify using a windfall allowance within housing supply.

4.31 During the last 10 years housing supply from net windfall sites, by far the largest proportion derives from conversions/change of use and from very small windfalls (sites below 0.2ha). These totals are significant in as much as they fall outside the threshold used to identify potential housing sites in the Local Plan and therefore will not otherwise be identified in future years. By including a qualified allowance for this type of windfall within the housing supply this would ensure that an appropriate estimate of future windfall supply is included within the housing trajectory. The figure for windfalls proposed to be projected forward is **199** dwellings per annum which is

effectively a mean average for these two categories of windfalls calculated over a 10 year period. (See Table 8, below, for details)

Table 8: Projection of Windfall Sites <0.2 ha and Change of Use and Conversions

Mean Average	
Average windfall completions on sites <0.2 ha	50
Average windfall completions on COU & Convs	149
Mean Average Projected Annual Windfall Rate	199

Applying Discount Rates to the Future Windfall Allowance

- 4.32 A discount rate can be applied to both the delivery of identified consented sites and housing allocations to allow for uncertainty within the market. This discount rate is typically around 10% based on evidence of past housing delivery of consented sites and comparison with other local authority non-delivery rates. Alternatively, an additional allowance in housing supply can be made. A discount rate for the future supply of housing from windfall sites (i.e. as yet unidentified windfalls without the benefit of consent) has been considered especially in the case of small sites below 0.2 ha. This acknowledges that the capacity of unidentified sites to accommodate future windfall development is finite within a constrained urban area.
- 4.33 An increase in the delivery of homes resulting from changes of use from offices is currently being experienced largely a result of relaxed permitted development rights. Whilst this source of supply is finite and may reduce over time it is too early to predict such an outcome bearing in mind that we continue to experience completions resulting from the legislative change.
- 4.34 However, as a result of our analysis of delivery trends (see Section 3) indicating marginally increasing levels of changes of use and conversion of existing properties over the last 10 years and increasing levels of housing resulting from sites below 0.2 hectares, the discounting of projected windfalls for these reasons is not deemed appropriate at this time.
- 4.35 Should planning policy change in future years this approach may be reconsidered and potentially a discount rate applied at that time.

Risks Involved in Including a Windfall Projection

- 4.36 Recognition is made of the fact that there are no circumstances in which the inclusion of any category of windfall carries no risk at all. However, at the same time by not including a windfall allowance this also carries implied risks, especially in light of NPPF direction and associated guidance that this may result in significant underestimates of future housing land supply.
- 4.37 Annex 1 of this paper carries out an appraisal of risks associated with the inclusion of various elements that fall within each windfall category. Whilst this approach can result in a subjective analysis we have endeavoured to evaluate all potential risks involved in any windfall inclusion.
- 4.38 The tables highlight that the lowest risk options for inclusion within a windfall projection are associated with sites of less than 0.2 ha (both brownfield and greenfield) together with conversions and changes of use.

5 Conclusions

5.1 A number of factors have been considered in determining a realistic housing windfall allowance. The following sets out our intended approach:

- Timescale for historic windfall evidence
Use of selected completions from the last 10 years ensures that the full cycle of market conditions that have taken place during that time are taken into account. See paragraphs 4.2 and 4.3.
- Threshold and type of windfall to be included
Very small sites (below 0.2ha) and change of use/conversions will be monitored as the basis for our projections. See paras 4.4 to 4.9.
- When to introduce windfalls into the housing trajectory
To avoid double counting and allow time for sites to continue through the development process, windfalls will be included from year 4. See paras 4.21 to 4.28.
- What level of windfalls should be included in the housing trajectory
A figure of 199 dwellings per annum provides an appropriate level reflecting past development trends. See paras 4.29 and 4.31.
- Discounts
We do not intend to apply a discount to windfall projections. See para 4.32 to 4.35.

Annex 1

Risk Analysis

1. The following tables provide a risk analysis for all potential windfall categories and each type has been designated a level of risk associated with their inclusion within a future windfall projection.
2. Whilst there are no circumstances in which the inclusion of any category of windfall carries no risk at all, there has also be a recognition that by not including a windfall allowance this also carries with it implied risks, especially in light of NPPF direction and associated guidance that may seriously underestimate the future housing land supply.
3. Assigning risk to the elements making up a potential windfall allowance can be seen as a subjective exercise. In adopting a system that classifies potential windfall types into seven levels of risk we have endeavoured to designate each one appropriately and have only considered low and moderate risk categories for potential inclusion within a windfall allowance.

Type of Windfall	Component	Potential net Annual Completion Rate	Risk Analysis	Risk Level
Unallocated Brownfield Land	Very Small Site (<0.2 ha)	45.8	Historically this type of site has provided a significant level of housing completions within the York Authority Area. There has been an upward trend associated with this type of site providing housing over both the last 10 years and last 5 years as the market has corrected itself following a recessionary period over 10 years ago and despite a change to working conditions due to Covid-19. (see the trend analysis section). This type/size of site will not be picked up in any future capacity study (SHLAA, 'call for site') as it falls below the minimum site size capacity threshold. Should a downward trend be experienced in future years, this will be reflected in future windfall projections and will need to take account of any trend analysis associated with developments within this category	+
	Small Site (0.2 to 0.4 ha)	15.6	Sites ranging from 0.2 to 1.0 ha should be picked up in our housing capacity studies as they fall above the minimum size thresholds we currently apply for site assessment. It should be stressed that historically sites of this nature are unlikely to have been allocated over the last ten year monitoring period (a time over which York did not have an adopted development plan) and, therefore, the total completions resulting on them reflect this and are undoubtedly inflated as a consequence.	
	Medium Site (0.4 to 1.0 ha)	61.3	Over the previous 10 years the trend has declined in the number of houses resulting from both of these sizes of site and in more recent years a very limited number of homes have resulted from small sites with just 9 homes being completed over the last four years. However, 130 homes were completed on medium sites in 2020/21	
	Large Site (>1.0 ha)	14.9	Whilst it could be argued that this type of site may not necessarily be picked up in a SHLAA, or similar urban capacity study, and that market conditions tends to bring about the availability of this type of site at irregular intervals and the possibility of Government incentives that may take place over time, the random nature in which this type of site is made available is very hard to predict. For this reason we do not consider it wise to include a future windfall allowance for this type of site. Over the long term a levelling of supply of completions in this type of site has been experienced. 2019/20 saw the first completions within this category for more than 6 years, with a further 58 homes on this type of site were complete in 2020/21 resulting in an increased trend over the short term.	
	Changes of Use & conversions	144.1	An levelling out in the supply of homes from conversions and changes of use has taken place over the last ten years. High numbers of completions from this source were experienced around 4 to 5 years ago due to Government incentives, through the relaxation of permitted development rights (now made permanent). However, a downward trend has taken place over the last 5 years as the peak of completions took place in 2015/16 and 2016/17. The supply remains strong and 318 new homes were completed in this category during the last three monitoring years. It is most unlikely that this type of development will be identified through a housing capacity study. Therefore, we consider that the inclusion of a justified projection of this type of housing windfall should be made as they have consistently become available in York and are likely to continue to provide a reliable source of housing supply. The long term evidence, over the last 10 years, reveals a steady supply of homes from this source could justifies the mean average projection for future years and is deemed appropriate as it provides more certainty and justification for the inclusion windfalls within the housing trajectory. Should the more recent relatively lower completion numbers continue, this will be reflected in a projection of a lower average for future years within the windfall figures. The influence of Covid-19 and materials shortages upon the development industry is reflected in lower completions across the categories in more recent years. Adopting a mean average projection of 10 years supply helps to lessen the impact of projecting a 5 year figure to allow time for the market to correct itself in time.	+

Type of Windfall	Component	Potential net Annual Completion Rate	Risk Analysis	
Unallocated Greenfield Land	Very Small Site (<0.2 ha)	4.2	<p>Historically this type of site has provided a relatively low level of housing completions within the York Authority Area, although in only one year (2013/14) there were no housing completions experienced from this source. 2017/18 experienced the highest level of completions from this source with 15. An upward trend associated with this type of site providing housing has been experienced over the last ten years. However, a downward trend in housing supply from this source has been experienced in the last five years and may show the affect that covid-19 has made to this part of the housing market.</p> <p>As with unallocated Brownfield sites of the same size, this type of site will not be identified in any future capacity study (SHLAA, 'call for site') as it falls below the minimum site size threshold. There is the possibility of future plan policies protecting small urban Greenfield sites from development which adds to the risk potential for inclusion of this type of site in windfalls. Previously Greenfield sites were excluded from any future windfall projections, however, the most recent NPPF defines windfall sites as 'sites not specifically identified in the development plan'. Therefore, Greenfield sites have not specifically been excluded from potential future projections.</p>	+
	Small Site (0.2 to 0.4 ha)	3.5	<p>Similar to brownfield sites ranging from 0.2 to 1.0 ha these sites should be picked up in our housing capacity studies as they fall above the minimum size thresholds we currently apply for site assessment. It should be stressed that historically sites of this type are unlikely to have been allocated over the last ten year monitoring period (a time over which York did not have an adopted development plan) and, therefore, the total completions resulting on them reflect this and are undoubtedly inflated as a consequence. Sequentially brownfield sites are prioritised for development over Greenfield sites – the future projection of delivery from Greenfield sites of this size is deemed too risky and not recommended.</p>	
	Medium Site (0.4 to 1.0 ha)	6.6	<p>A relatively stable upward trend in the supply of homes from these types of sites has been experienced over the last 10 years and evidence shows that this trend has continued over the shorter term (last 5 years).</p>	
	Large Site (>1.0 ha)	0.5	<p>Sites of this type have only provided additional homes twice over the last ten years and other than being identified through the allocations process are unlikely to come forward in future years. Sequentially brownfield sites are prioritised for development over Greenfield sites – the future projection of delivery from Greenfield sites of this size is deemed too risky and not recommended.</p>	+
	Changes of Use & conversions	5.2	<p>Over the last ten years, every year has provided housing completions from this source – the majority of which are agricultural building/barn conversions. As York is a combined urban/rural authority area this type of development is likely to continue if not increase as a result of the relaxation of permitted development rights currently being experienced and likely to continue as the relaxed permitted development rights have now become permanent.</p> <p>A stable trend associated with this type of windfall type is evidenced over the last 10 monitoring years whilst a dip over the shorter 5 year period is likely to reflect the impact of Covid-19 on the development industry during the previous two years.</p>	+
	Garden Infill Developments	34.3	<p>NPPF (March 2012) specifically excluded garden infill developments from windfall allowances with paragraph 48 stating windfalls 'should not include residential gardens'. There is no mention of exclusion of this development from windfall within the latest NPPF, however, we have not included any garden infill sites and consider them to be too high a risk to make any future allowance for at this time.</p>	+

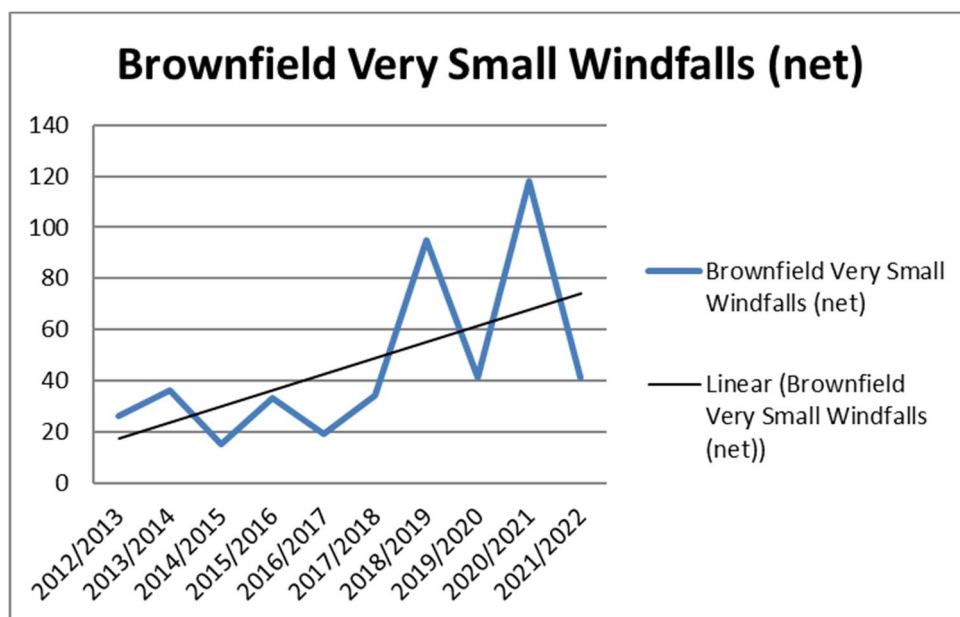
Symbol	Risk Level if Included Within Windfall
	No Risk – this position holds no significant risk for inclusion
	Very Low Risk – an extremely low risk is associated with the inclusion of this windfall type - our position should easily be defended if challenged
+	Low Risk – a low risk is associated with the inclusion of this windfall type. However, our position should be defensible if challenged
	Low to Medium Risk – the inclusion of this potential windfall holds a low/medium risk with a defensible reason for inclusion
+	Medium Risk – A balanced risk is associated with the inclusion of this type of windfall. It is probable that the inclusion is sound, however, there is no guarantee that under inspection this would be the case.
	High Risk – The inclusion of this windfall type carries a great risk and difficult to defend if under scrutiny
+	Very High Risk- significant risk is associated with the inclusion of this windfall type and extremely difficult to defend

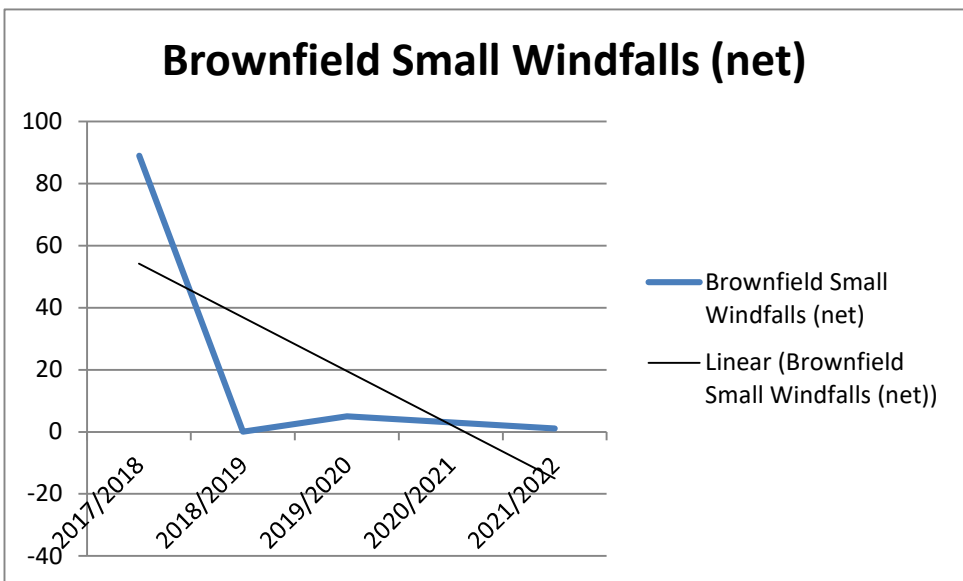
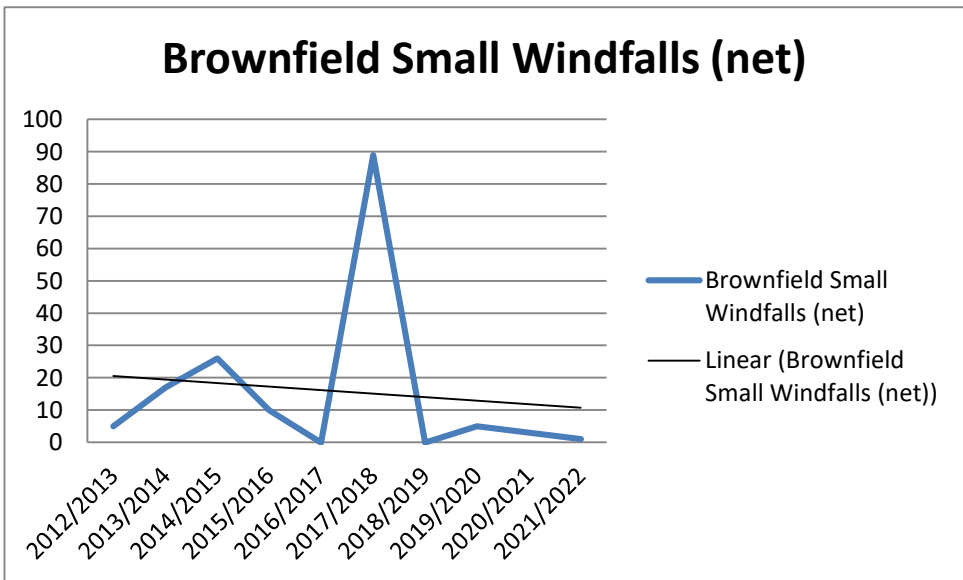
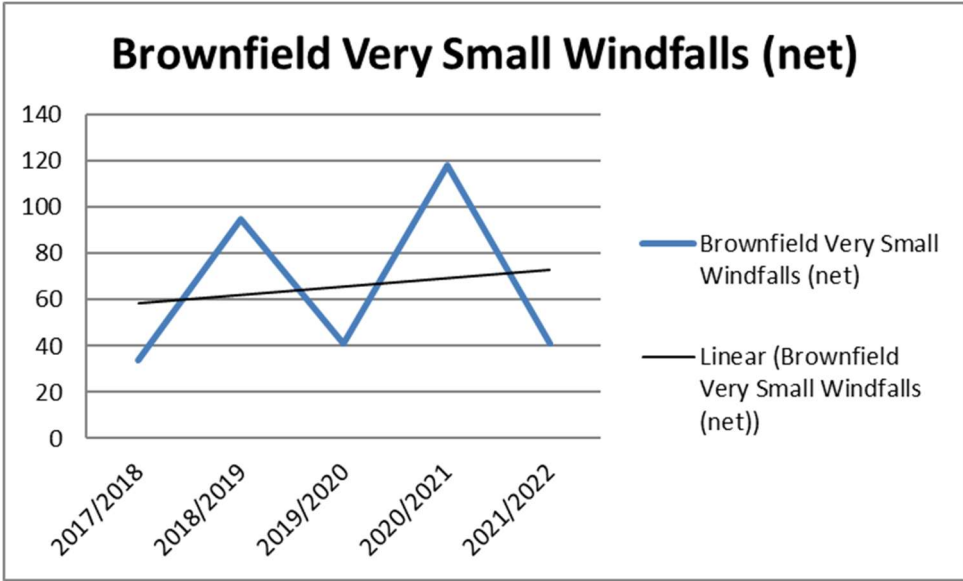
Annex 2

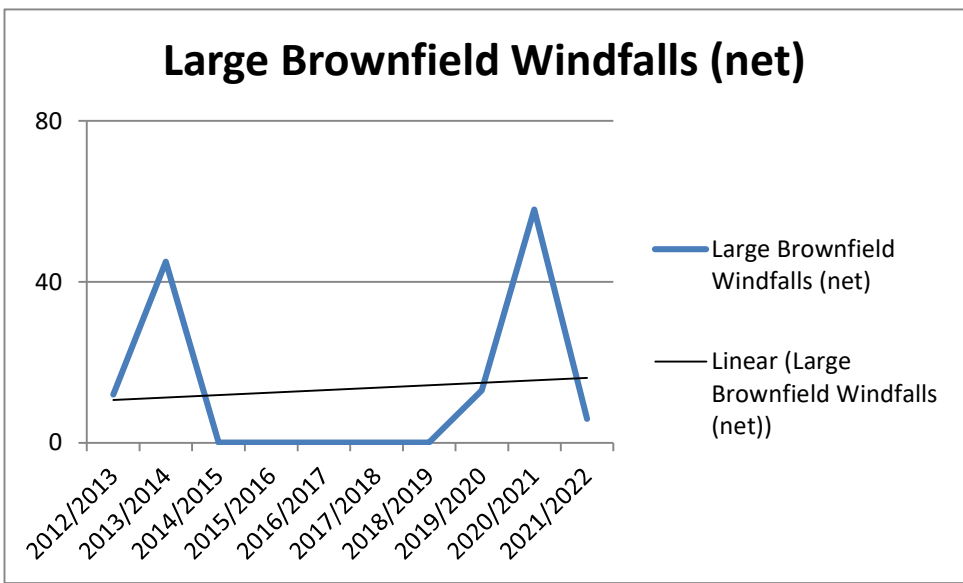
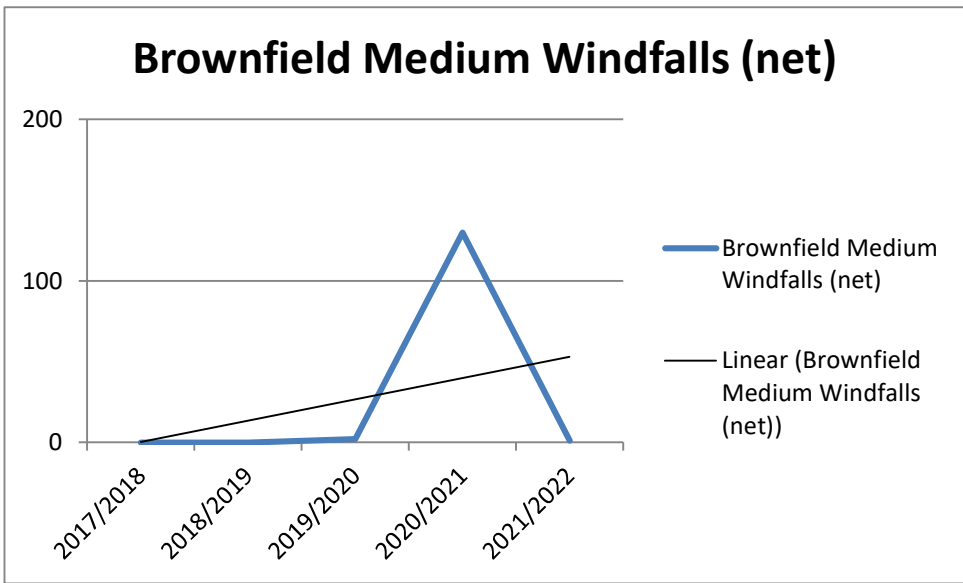
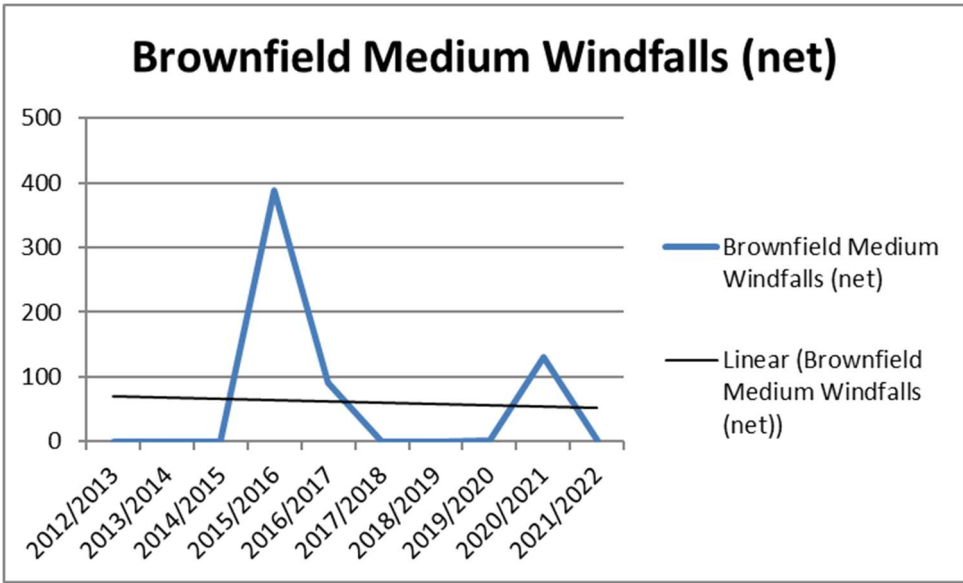
Full Windfall Trend Analysis

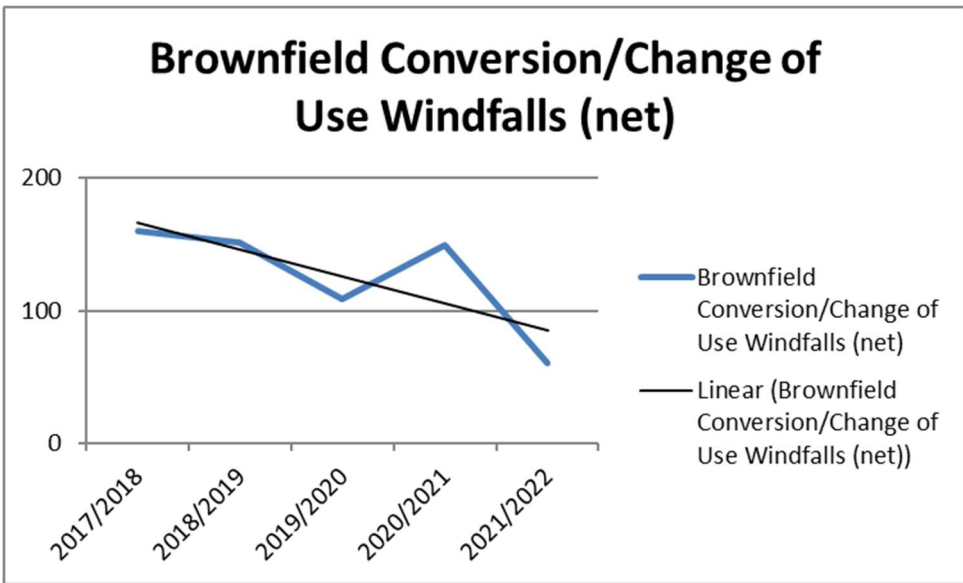
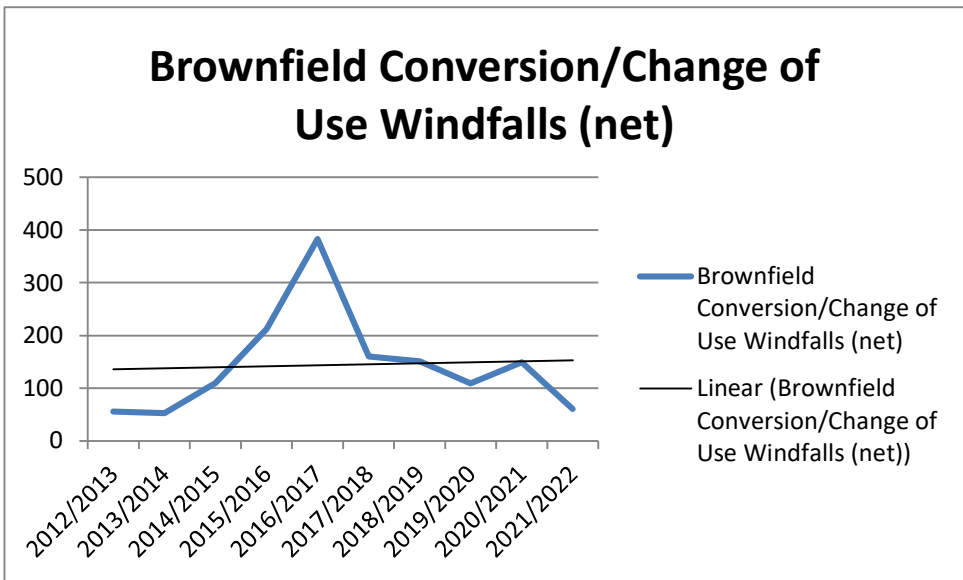
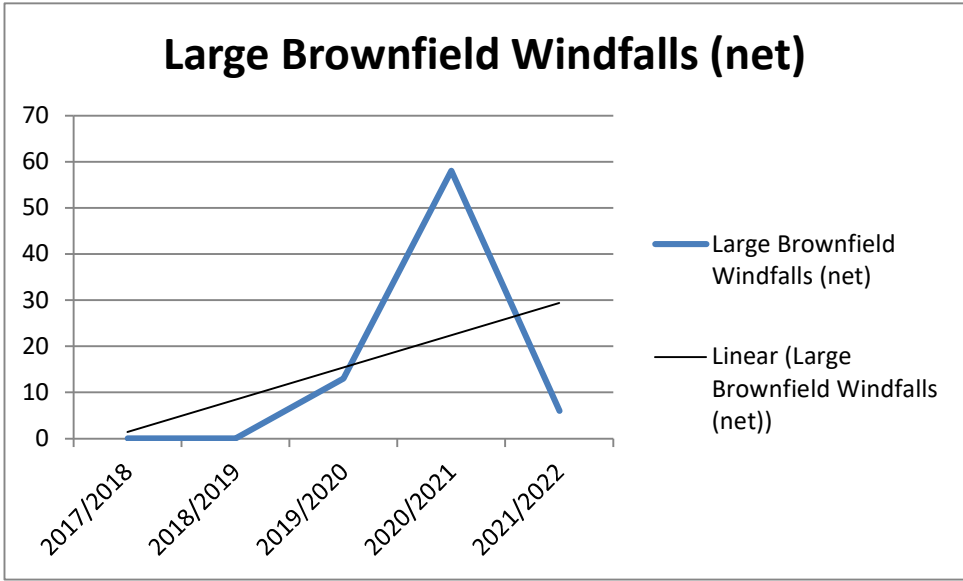
Brownfield Land Windfalls (2012-2022)

Year	Very Small Windfalls (net)	Small Windfalls (net)	Medium Windfalls (net)	Large Windfalls (net)	Conversions/ Changes of Use (net)	Total (net)
2012/2013	26	5	0	12	55	98
2013/2014	36	17	0	45	52	150
2014/2015	15	26	0	0	110	151
2015/2016	33	10	389	0	212	644
2016/2017	19	0	91	0	383	493
2017/2018	34	89	0	0	160	283
2018/2019	95	0	0	0	151	246
2019/2020	41	5	2	13	109	170
2020/2021	118	3	130	58	149	458
2021/2022	41	1	1	6	60	109
Totals	458	156	613	134	1441	2802

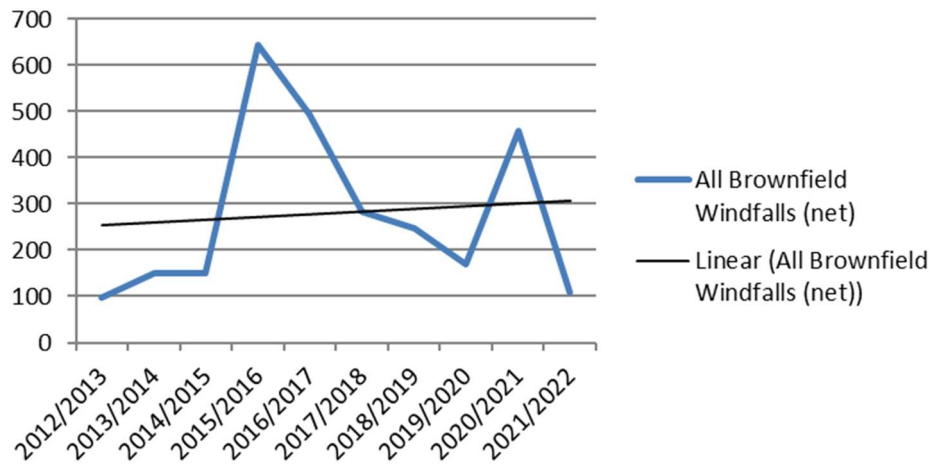




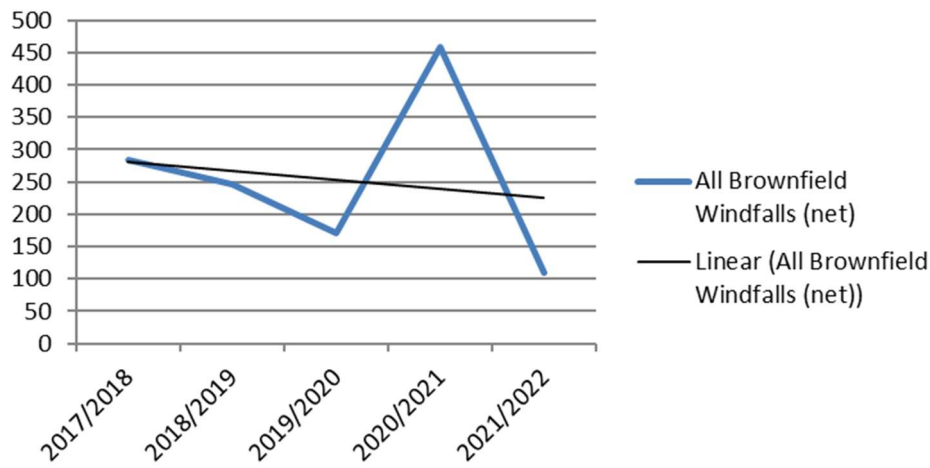




All Brownfield Windfalls (net)

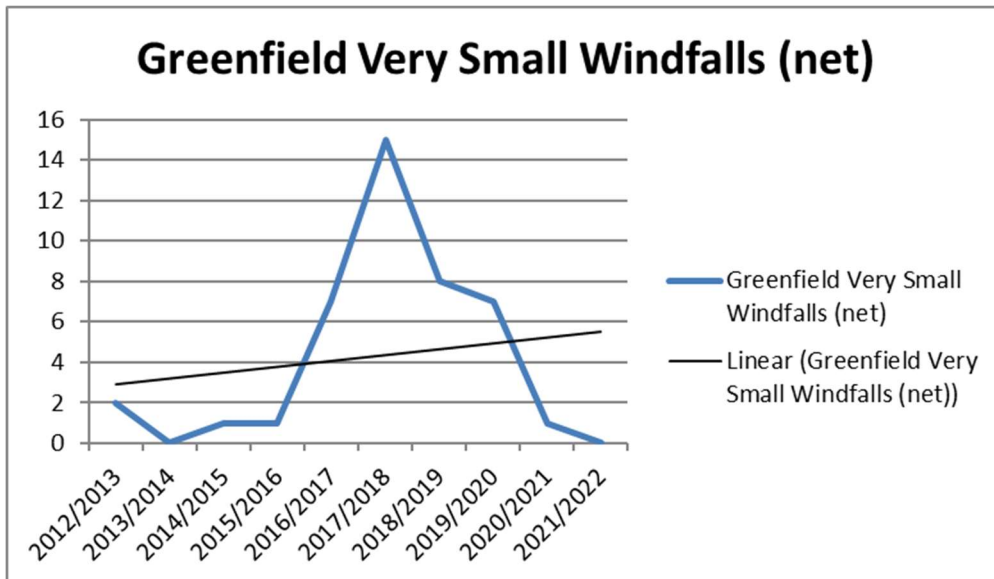


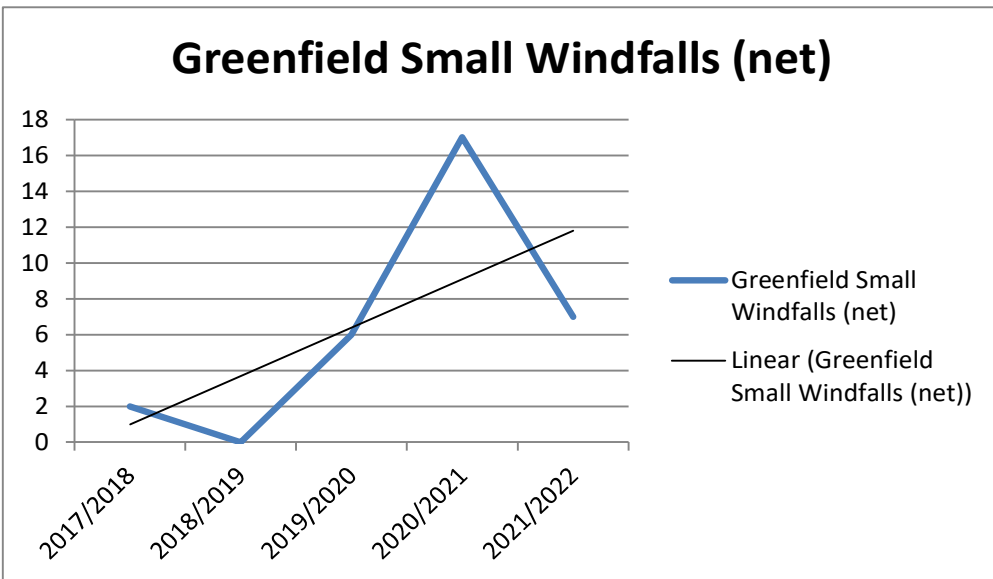
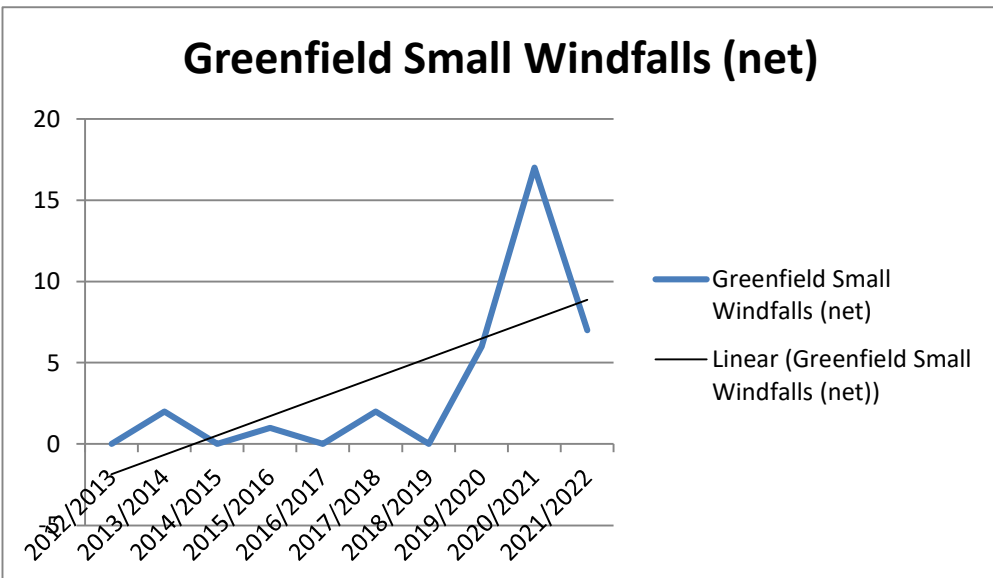
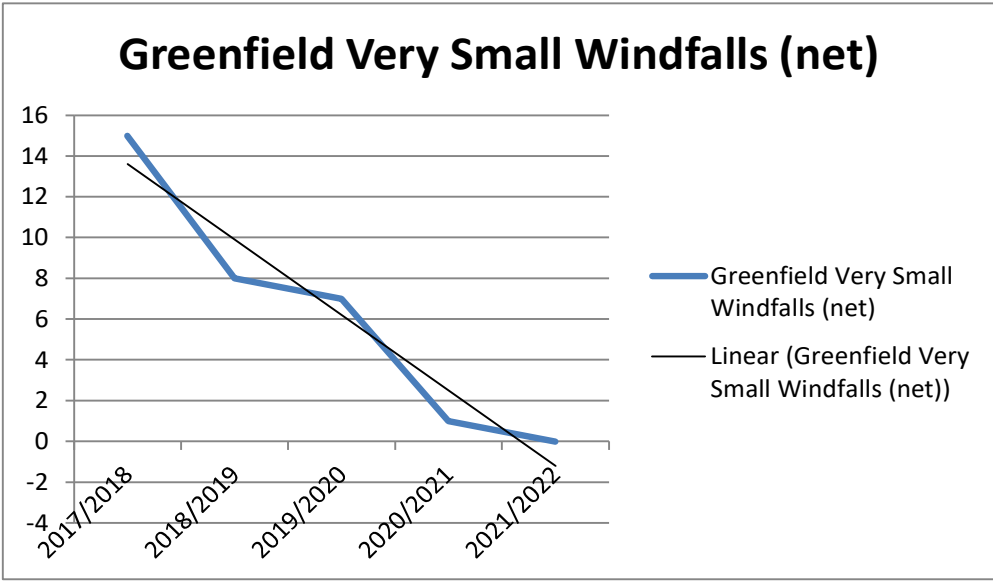
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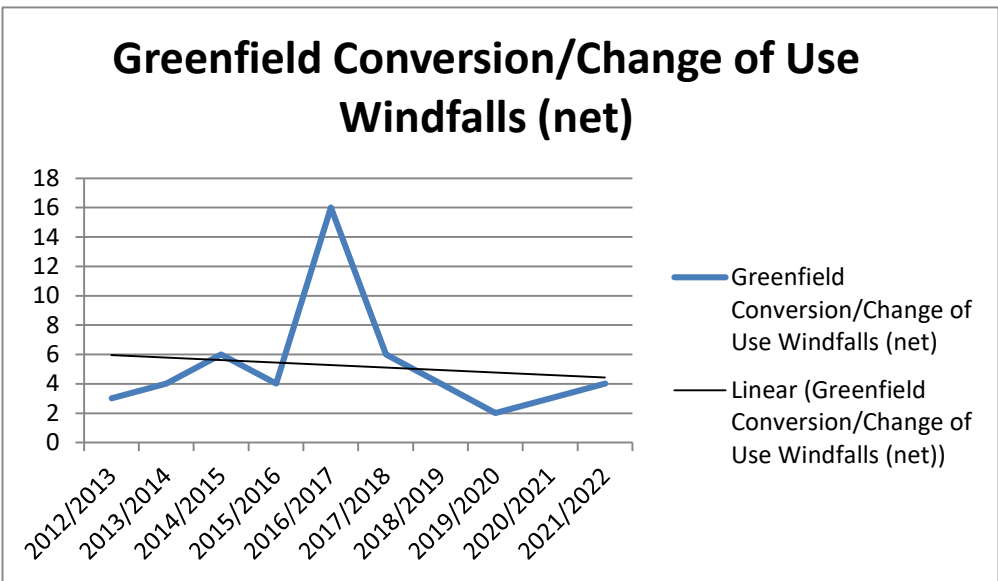
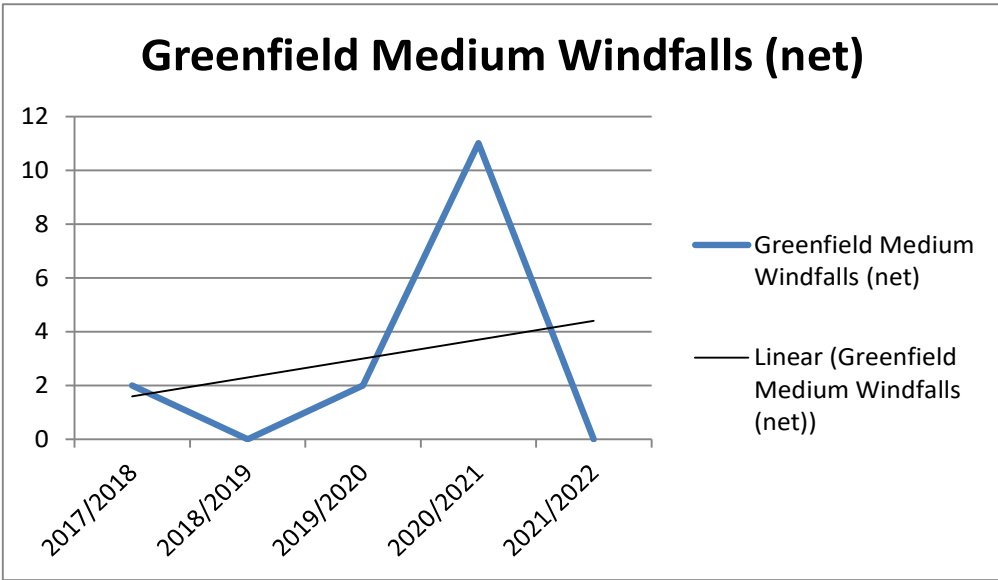
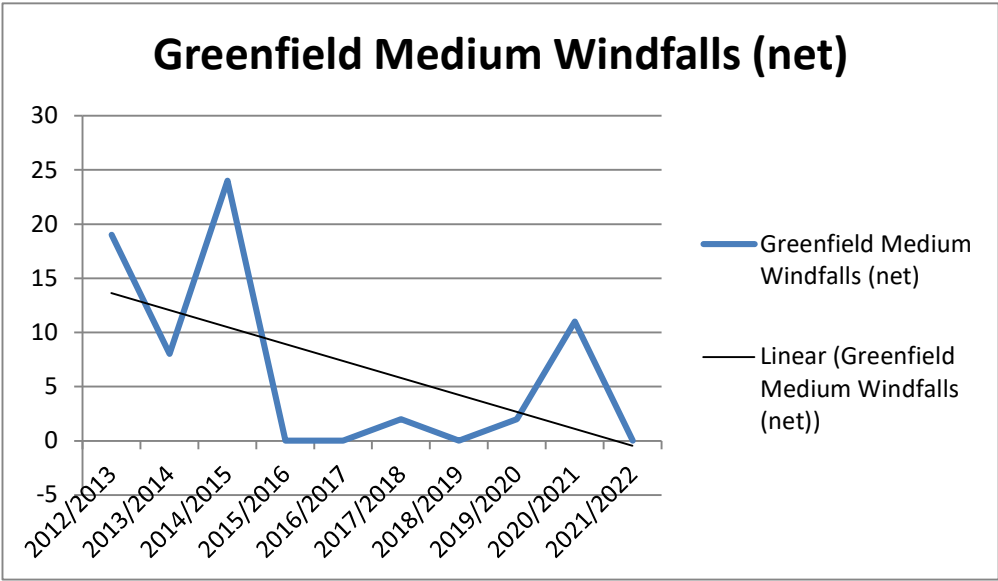


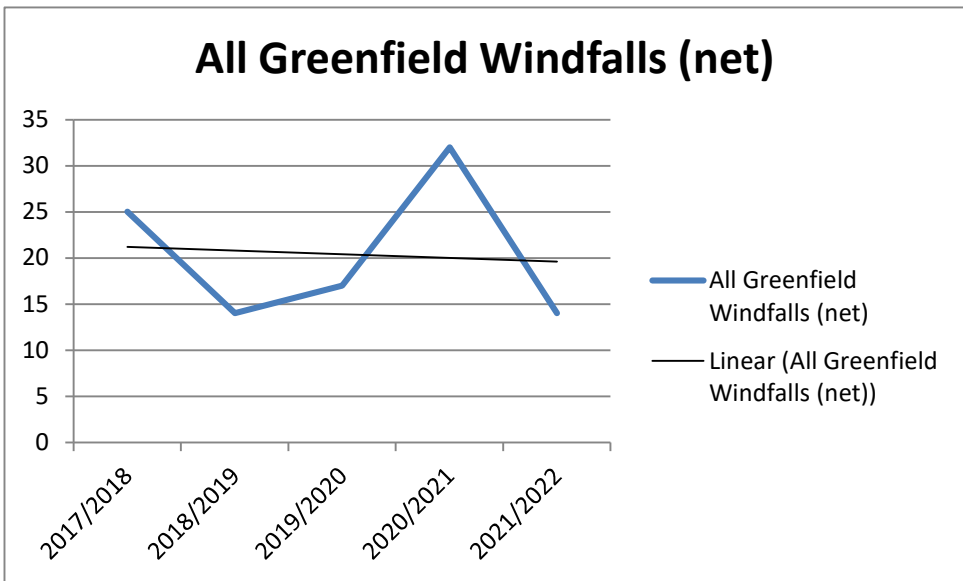
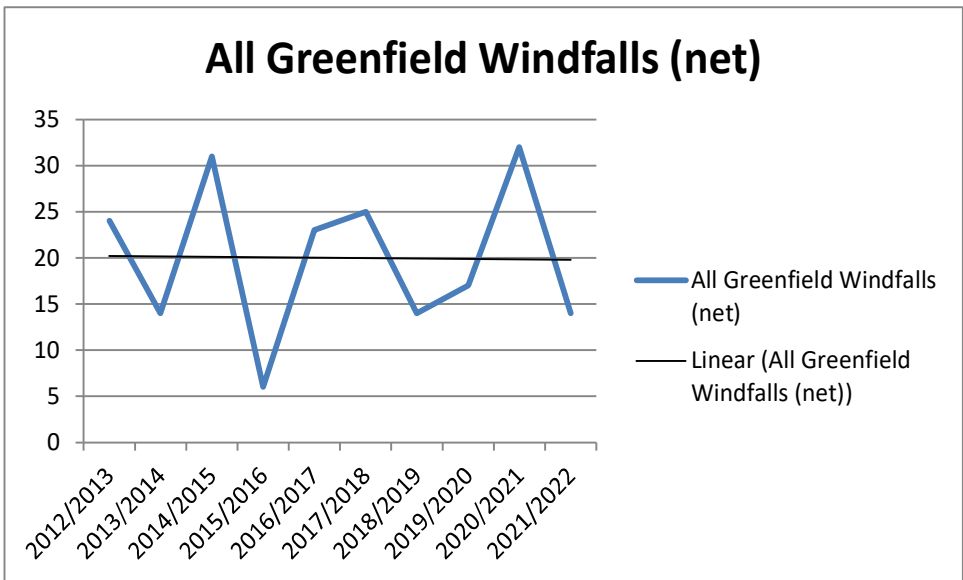
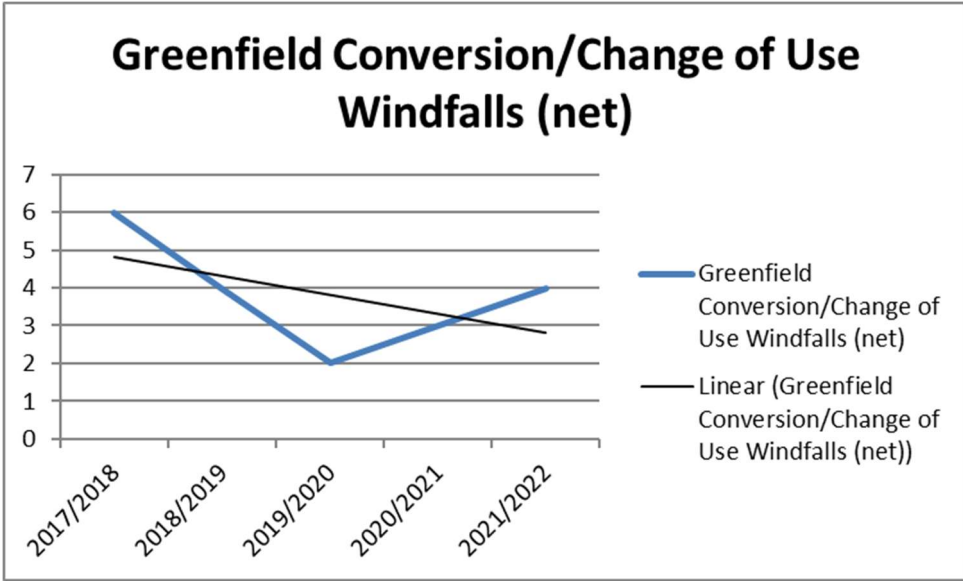
Greenfield Land Windfalls (2011-2021)

Year	Very Small Windfalls (net)	Small Windfalls (net)	Medium Windfalls (net)	Large Windfalls (net)	Conversions/Change of Use (net)	Total (net)
2012/2013	2	0	19	0	3	24
2013/2014	0	2	8	0	4	14
2014/2015	1	0	24	0	6	31
2015/2016	1	1	0	0	4	6
2016/2017	7	0	0	0	16	23
2017/2018	15	2	2	0	6	25
2018/2019	8	0	0	2	4	14
2019/2020	7	6	2	0	2	17
2020/2021	1	17	11	0	3	32
2021/2022	0	7	0	3	4	14
Totals	42	35	66	5	52	200



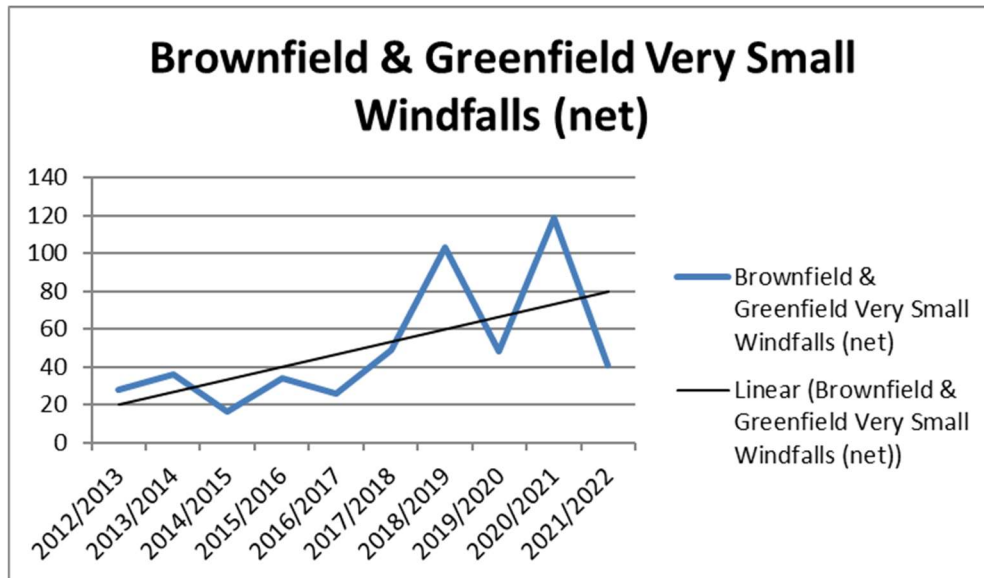




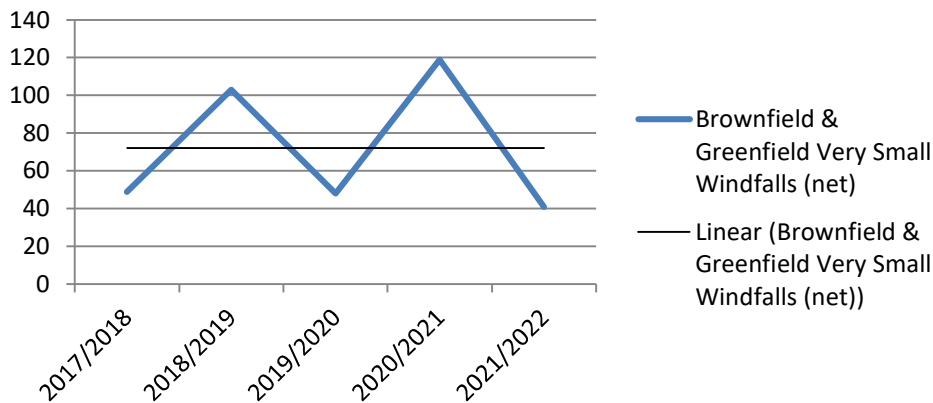


Combined Brownfield and Greenfield Windfalls (2011-2021)

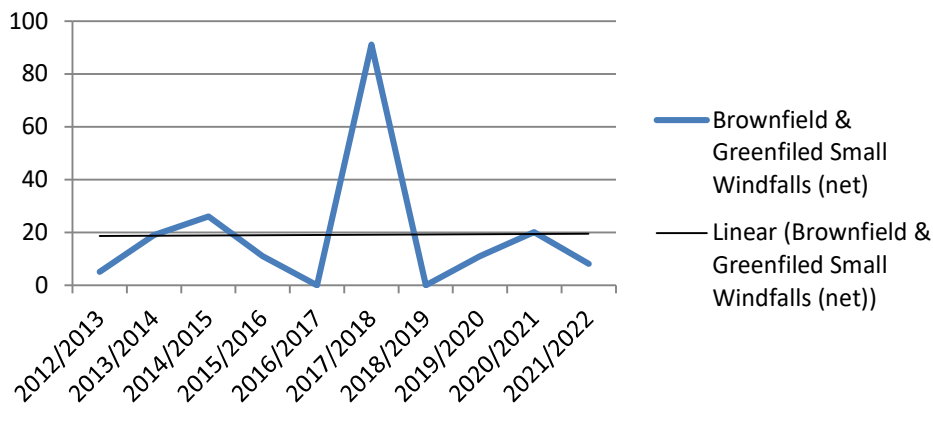
Year	Very Small Windfalls (net)	Small Windfalls (net)	Medium Windfalls (net)	Large Windfalls (net)	Conversions /Changes of Use (net)	Total (net)
2012/2013	28	5	19	12	58	122
2013/2014	36	19	8	45	56	164
2014/2015	16	26	24	0	116	182
2015/2016	34	11	389	0	216	650
2016/2017	26	0	91	0	399	516
2017/2018	49	91	2	0	166	308
2018/2019	103	0	0	2	155	260
2019/2020	48	11	4	13	111	187
2020/2021	119	20	141	58	152	490
2021/2022	41	8	1	9	64	123
Totals	500	191	679	139	1493	3002



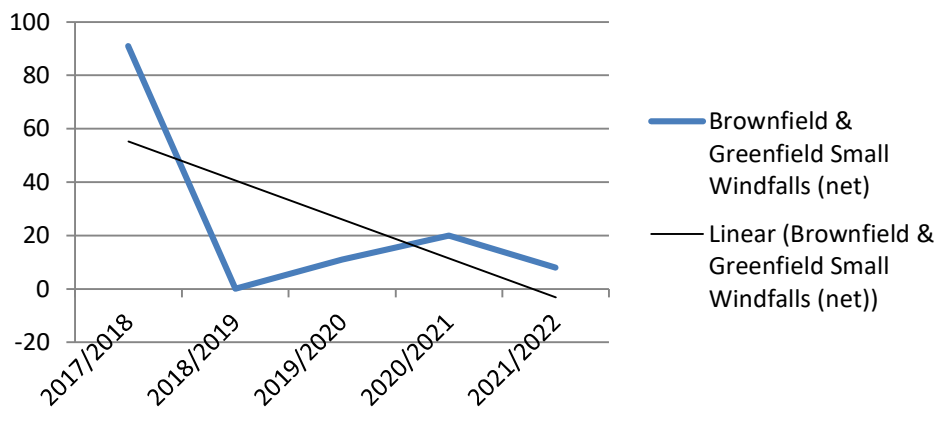
Brownfield & Greenfield Very Small Windfalls (net)

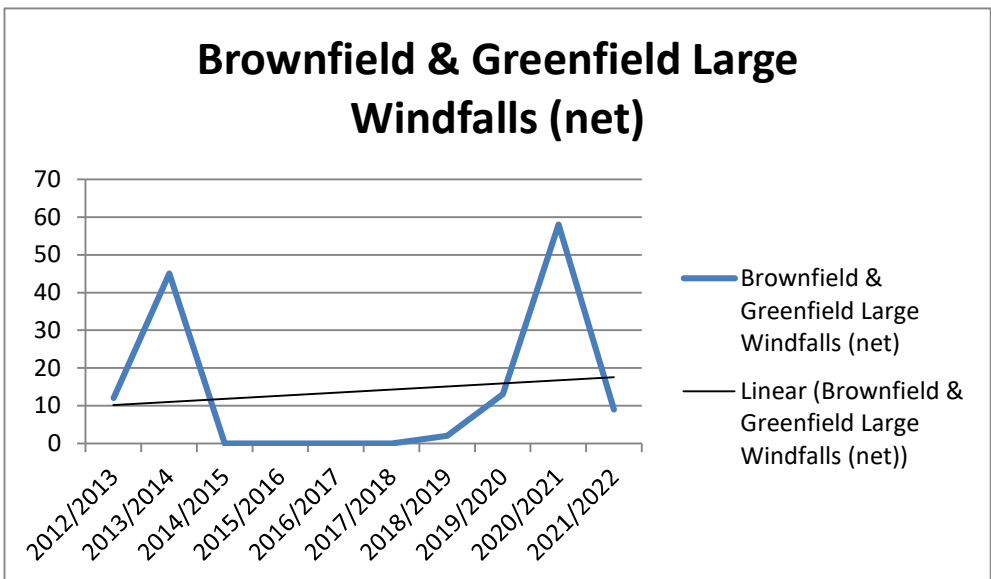
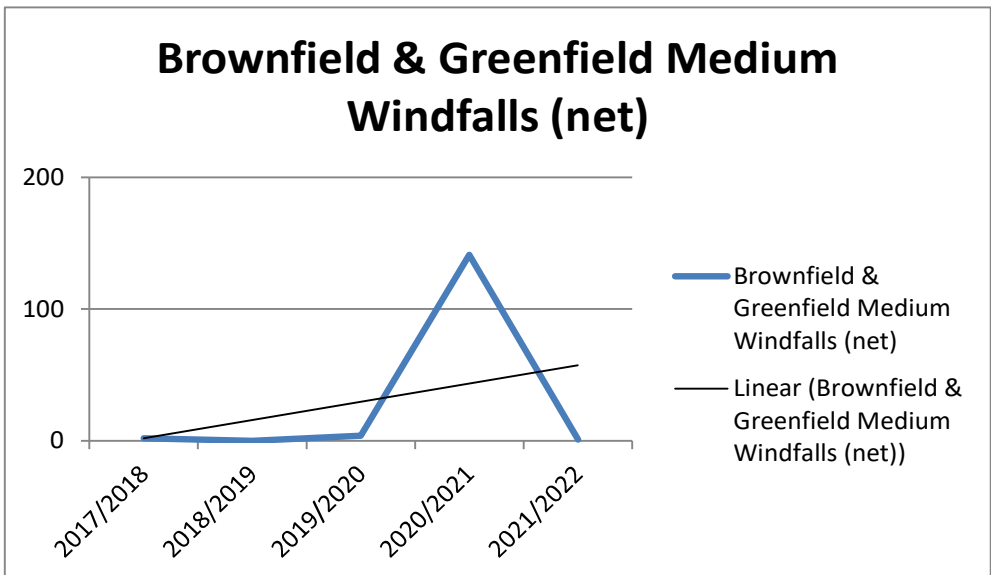
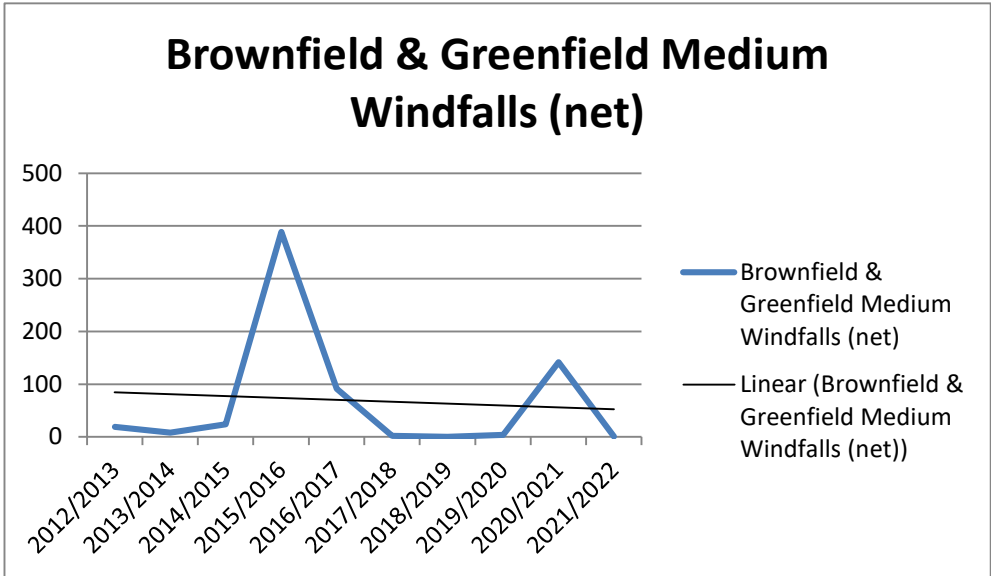


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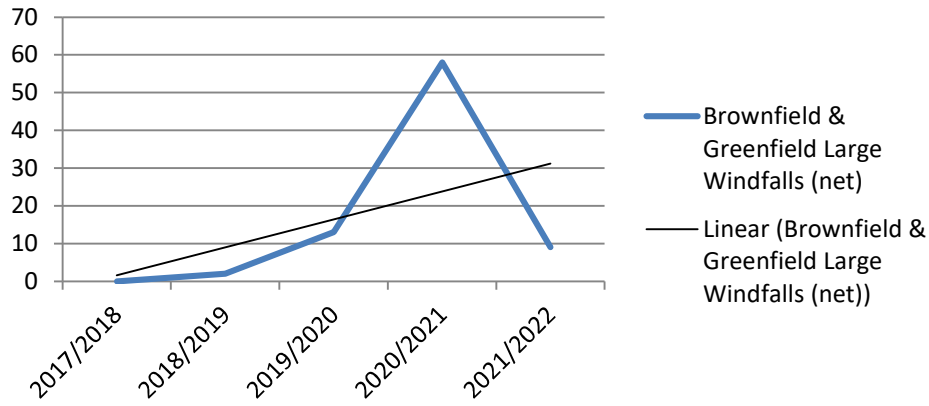


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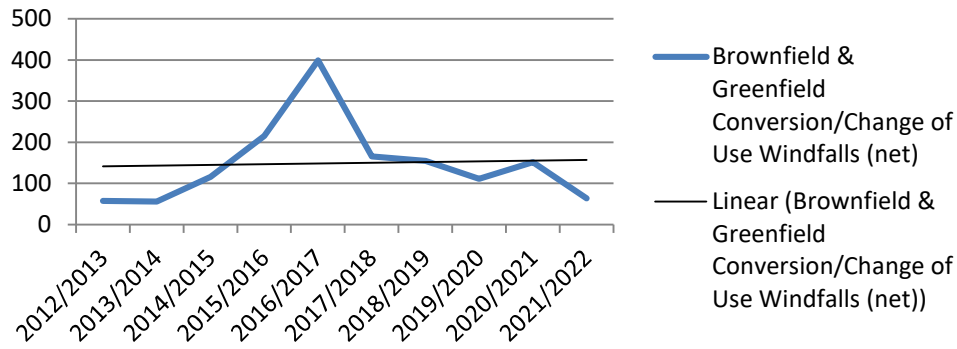




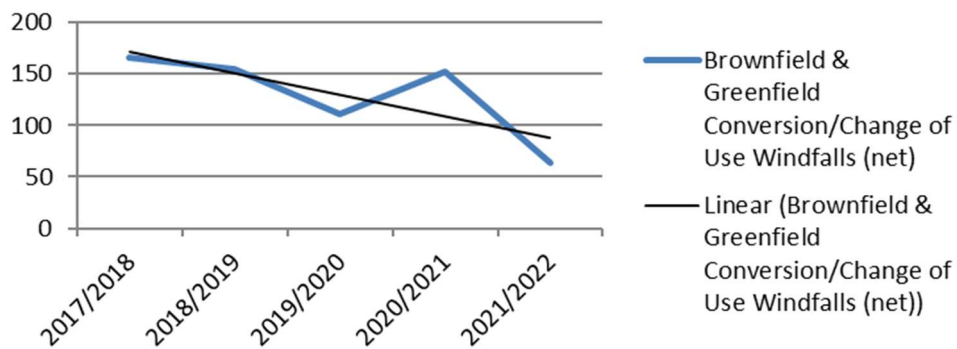
Brownfield & Greenfield Large Windfalls (net)

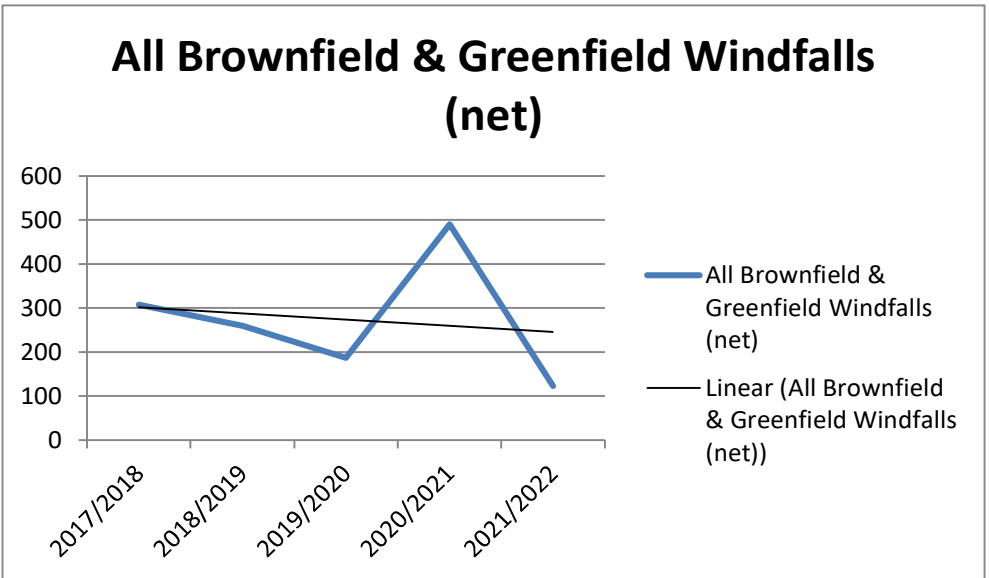
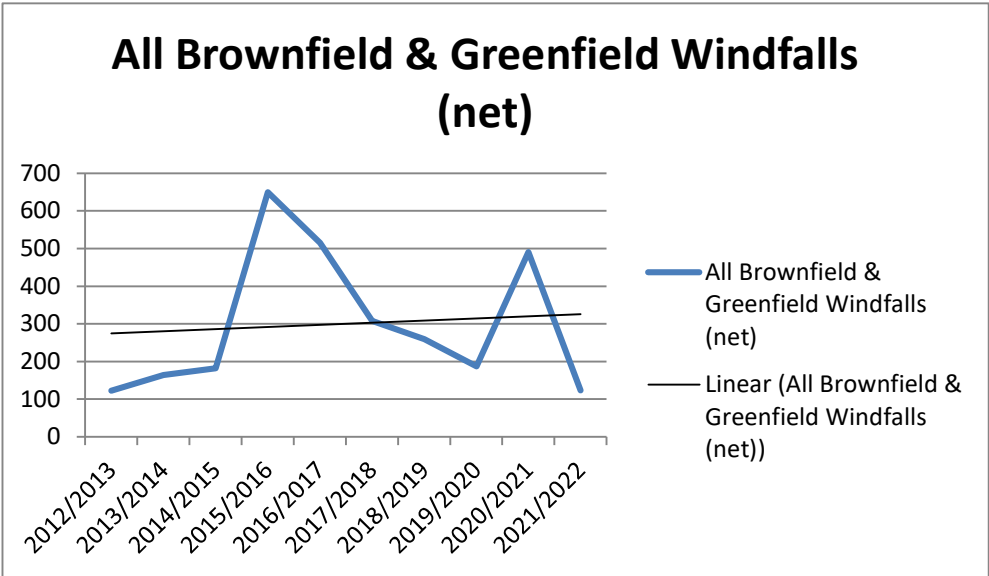


Brownfield & Greenfield Conversion/Change of Use Windfalls (net)



Brownfield & Greenfield Conversion/Change of Use Windfalls (net)





Annex 3

Consultation Comments and Responses

Updated to take into account comments received as part of the City of York Local Plan Publication Draft (Regulation 19 Consultation) (February 2018)

Support Comments	Response
<ul style="list-style-type: none"> • Windfalls accurately reflect what actually happens within the City • Agree with the inclusion of windfalls – their omission in previous draft local plan artificially inflated housing need • The inclusion of windfalls is in line with the NPPF. • Support the overall strategy that includes windfall sites • Support windfall inclusion after 5 years • Agree sites over 0.2 should not be included within windfall projections • Agree windfalls should not be included within the first 3 years of the Plan 	<p>Our approach to a windfall allowance broadly follows that of the our earlier technical papers. As previously explained housing windfalls other than sites of less than 0.2 ha or conversions and changes of use will not be picked up in any ‘call for sites’ or allocations exercise as they either fall outside the thresholds currently set or in the case of conversions are extremely difficult to allocate on a site specific basis.</p> <p>The approach we support matches that detailed within the NPPF and NPPG (see paragraphs 2.1 to 2.5 of the 2016 technical paper)</p> <p>We intend to include a windfall allowance after year three to allow unimplemented consents and potential approvals time to progress through the planning system – this should ensure that double counting does not take place.</p> <p>Based on the historic housing completions figures for York, to not include a windfall allowance (based on past delivery on sites below 0.2 ha and conversions compared to overall housing completions) would under estimate and future housing supply by as much as 26% based on the last 10 years housing completions figures. This will obviously change in proportion to the target set for York in future years though it does demonstrate the importance windfalls have made to past housing delivery in York during a period in which a development plan was not in place.</p>

Objections & General Comments	Response
<ul style="list-style-type: none"> • Inclusion of up to 169 windfalls per annum is a significant risk to the plan delivery • More detailed evidence base is required • This approach is not positively planned or effective and fails to meet the tests outlined in paragraph 182 of the NPPF • Projections are based on past delivery not based on certainty of the capacity of sources of windfall supply going forward • Phasing should be from year five not year three to avoid double counting • A 10% lapse rate should be considered • Object to a mechanism that provides uncertainty in housing delivery • A historic 10 year period used to calculate future supply should not be used – a less generic approach should be implemented • An allowance of 169 windfalls pa equates to 19% of future housing requirement which is too high. • The lack of an adopted plan has resulted in past high levels of windfall completions. • More housing should be planned for on allocated sites where they are needed. 	<p>Whilst responding to the objection comments to our windfall paper it is worth considering the following;</p> <p>Windfall sites, as defined in the National Planning Policy Framework (NPPF) (March 2012) are: “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.”</p> <p>To include a qualified windfall allowance we have to accept that there is no definitive guidance provided to direct a methodology for calculating future windfalls.</p> <p>Effectively, we have provided evidence showing that historically windfalls have consistently become available within York and have provided a reliable source of housing supply. Our SHLAA does not pick up sites below 0.2 ha due to the threshold set and conversions are extremely unlikely to be picked up in any urban capacity study. Our trend analysis shows in the case of very small windfalls that an increase in supply has been experienced over the last 5 years following a steep decline during a recessionary period. Conversions and changes of use have increased in both the long and short term and it could be argued that a greater allowance should be included within the future trajectory. We have projected a cautious level in future windfall supply compared to more recent trends, especially in terms of conversions, and we will adjust any future potential supply annually to</p>

<ul style="list-style-type: none"> • Windfall sites should be viewed as a bonus not a component of supply • Using windfalls fails to respond to a plan led planning system, government policy requires evidence not only that windfall has provided a reliable source of supply but also that it will continue to be such a source. • Due to the restrictive nature of York contained within its Green Belt and with diminishing infill sites it is questionable whether the proposed windfall levels will be maintained • More sites should be allocated rather than being reliant on a future windfall supply • The Plan will not be effective as it relies too heavily on windfall sites and over development of York Central. • Windfall trends are based on a time when York did not have an adopted plan. 	<p>reflect market changes that will no doubt take place during the Plan period.</p> <p>Whilst considering our methodology we have looked at other approaches taken by local authorities nationwide and we are confident that our approach is robust by comparison.</p> <p>Our projections have been based on past delivery rates not on unimplemented consents. This should ensure our projections are based on actual events not on the promise of development that may change over time.</p> <p>We have used a rolling ten year evidence base that covers a full cycle of market conditions. A longer period would reflect more buoyant market conditions, whilst a shorter period may only reflect adverse or aggressive market condition over that shorter period of time.</p> <p>The methodology within our earlier paper considered a lapse rate to be applied to the windfall projection. However, due to current increasing trends within the windfall categories we intend to project forward a reduced rate does not appear to be appropriate at this time.</p> <p>Whilst the 10 year period used to evidence our windfall completion rates covered a time in which York had no adopted development plan (and hence limited allocation land) the categories we proposed to use to support a qualified windfall allowance would not have been picked up in</p>
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<ul style="list-style-type: none"> • Appreciate windfalls have provided a consistent level of housing supply in the past, however, their inclusion reduces flexibility in supply if allocations do not deliver as anticipated • A more flexible approach should be taken throughout the plan period. A 10% reduction to windfalls should be considered especially given the high levels of conversions of office space in recent years that is a finite resource. • Previous high rate of windfall delivery is questionable and this uncertainty should be reflected. • Accept that windfalls should be included after 5 years of the plan. However, the evidence does not justify such high levels projected forward. Levels should relate to the average since 2009/10 of 31 per annum. • CYC do not adequately justify a windfall allowance of (up to 169) dwellings pa. The windfall allowance should be based upon a reconsideration of delivery, particularly from changes of use and conversions. • Projections of very small site windfalls below 0.2 ha are understandable. Changes of use and conversions are less predictable and viewed with caution. • Other authorities use alternative methods of incorporating a windfall allowance across the plan period. 	<p>a SHLAA or call for sites exercise due to threshold levels and difficulty in picking up specific conversions.</p> <p>When we allocate housing development we plan to build in flexibility within this supply to ensure no shortfall takes place at the end of the Plan period.</p>
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