

Havant Borough Council

Windfall/Unidentified Housing Development: Analysis and Justification – A Background Paper

September 2013



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Summary and Background

This paper provides an analysis of previous windfall/unidentified residential development in the five areas of Havant Borough from 2006-2013. It provides justification for the inclusion of some windfall development within the five areas of Havant Borough for the purposes of formulating the Havant Borough Local Plan (Allocations) and future housing projections. This paper updates and supersedes that previously published in April 2012.

The adopted Havant Borough Local Plan (Core Strategy) has set the objective of delivering 6,300 net additional dwellings between 2006-2026. This is indicatively divided between the five areas of the borough identified in the Core Strategy; Emsworth, Havant and Bedhampton, Hayling Island, Leigh Park and Waterlooville.

Unidentified developments (more commonly termed as windfall developments) are those typically not allocated for development and which have previously been unidentified or unexpected. Historically, they have formed a significant part of the overall supply of past residential development in Havant Borough. The extent, type and potential continuation of this varies from area to area. This paper will therefore seek to provide an analysis of windfall housing development (by area) before explaining the importance and justification behind allowing for this as part of the overall housing requirement set in the Local Plan.

National policy, previously contained in PPS3 and now replaced in the National Planning Policy Framework (NPPF), recognises the supply from windfall development:

'Local planning authorities may make an allowance for windfall sites in the five-year supply 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. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.' [NPPF, paragraph 48]

Previously, PPS3 did not support the inclusion of windfall in the first 10 year period, but most particularly in the first 5 years. The Council is of the view that there is likely to be little windfall (certainly that which can be supported by 'compelling evidence') in the first 5 years as, arguably, a proportion of such development will either already have planning permission, or be in the process towards a planning application. However, a significant and relevant supply from windfall development remains in the borough after the immediate 5 year period. This paper will therefore look at past delivery rates from windfall (for the period 2006-2013) and expected future trends, as well as explaining the local circumstances and justification for windfall inclusion. A windfall allowance will be used for the period 2019-2026. This excludes the 5 year period following the expected adoption of the Allocations Plan and will run until the end of the plan period.

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Historic Windfall Delivery Rates and Expected Future Trend by Area

Past windfall rates have been obtained using the detailed housing completion data provided by Hampshire County Council. This includes information on the location and type of development, as well as the detailed planning application description. This allows a breakdown by area of development type.

The analysis of past trends covers the period from 1st April 2006 to 31st March 2013. This makes use of seven years of reliable and comprehensive completion data which can be readily broken down and analysed. It will also ensure that only recent data informs the analysis: Importantly, this will help to reflect changes in national planning policy affecting areas at risk from flooding. Planning Policy Statement 25 (Development and Flood Risk) was originally published in 2006 and this had notable implications on the acceptability of residential proposals, particularly on Hayling Island.

Residential Garden Land

With the relative suburban nature of the borough residential garden land continues to make an important contribution toward housing supply. Policy CS17 of the adopted Local Plan (Core Strategy) supports the principle of making best use of land within the urban area and this can include private residential garden land. Over the plan period garden land development is expected to provide an important amount of new dwellings based on the principle being acceptable in policy terms and past trend analysis.

Private garden land was not actively surveyed for development potential as part of the Council's Strategic Housing Land Availability Assessment (SHLAA). This is due to the difficulties in assembling garden land and having sufficient certainty of the sites deliverability/developability as a result. This is explained further in the Council's SHLAA. As a result garden land development remains a reliable and highly likely part of housing supply albeit difficult to ascertain the exact locations/sites for the purposes of the SHLAA and/or formal allocation. It is therefore more suitable for inclusion as unidentified/windfall development.

The NPPF is not supportive of the inclusion of garden land as windfall development but the Council believe there is clear evidence and policy support that supply from this source will continue. As with all windfall projections accounted for during the plan period it remains excluded from the 5 years following adoption.

Summary of Approach

When past windfall has been established this will be analysed for trends that are likely to continue in the years ahead. Large 'one-off' type past windfall developments will be omitted from the trend calculations to avoid distorting the projections. In addition, an overall 10% reduction will be applied to the resulting figure to ensure the projected windfall figure is realistic and achieves an appropriate balance between being too

optimistic or too pessimistic. It will then be demonstrated how the resulting windfall projections will be included in the forthcoming plan period and the Council's housing projections/trajectory.

Emsworth: Analysis of windfall/unidentified housing development

Introduction

The adopted Havant Borough Local Plan (Core Strategy) proposes in the region of 745-826 net new dwellings to be completed in Emsworth between 2006-2026.

Past net new dwelling completions in Emsworth

The following table outlines the number of net new completions in Emsworth in relation to the overall completions in Havant Borough.

Year	Borough net completions	Emsworth net completions	% completions in Emsworth
2006/07	236	17	7%
2007/08	390	55	14%
2008/09	252	3	1%
2009/10	145	6	4%
2010/11	231	39	17%
2011/12	168	9	5%
2012/13	249	49	20%
2006-2013	1671	178	11%

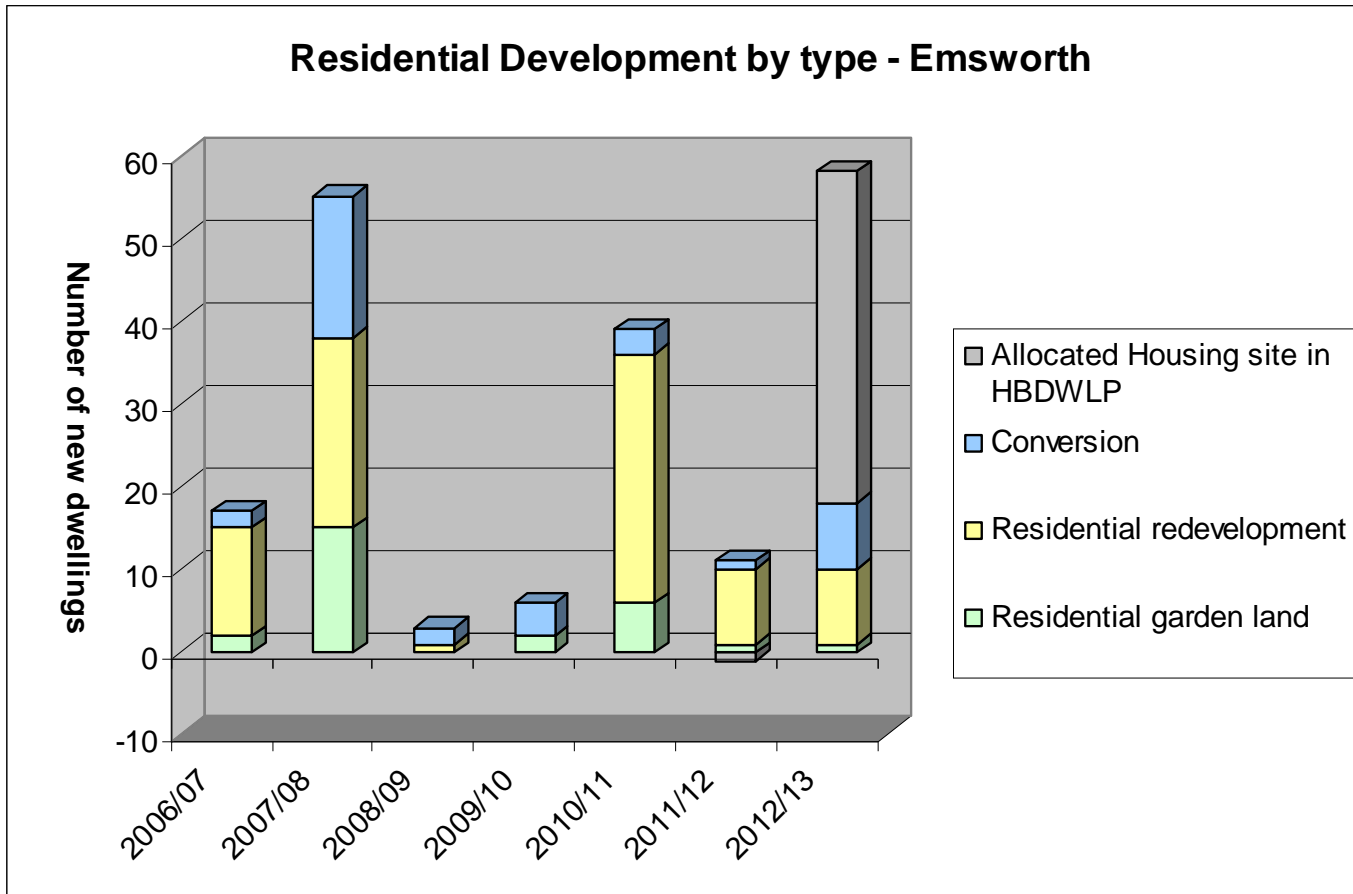
Looking in detail at the residential schemes undertaken in Emsworth during the period of analysis the data can be broken down by development type.

Year	Residential garden land (net)	Residential redevelopment (net)	Redevelopment of redundant/commercial/leisure use (net)	Conversion (net)	Allocated Housing site in HBDWLP (net)	Previous open space (net)
2006/07	2	13	0	2	0	0
2007/08	15	23	0	17	0	0
2008/09	0	1	0	2	0	0
2009/10	2	0	0	4	0	0
2010/11	6	30	0	3	0	0
2011/12	1	9	0	1	-1	0
2012/13	1	9	0	8	40	0
2006-2013	27	85	0	37	39	0
Average	3.86	12.14	0	5.29	n/a not windfall	0

(The numbers in the above table will not necessarily equate to the completion data as significant losses that distort the figures have been excluded)

Development Types explained:

- Residential garden land – e.g. New dwellings in existing residential plots and redevelopment of dwelling(s) to provide new/further residential accommodation on a notable larger footprint than the previous building(s)
- Residential redevelopment – e.g. Replacement dwellings, modest additions and then splits to multiple dwellings such as extensions to a single dwelling house followed by conversion to semi-detached (and similar)
- Redevelopment of redundant/commercial/leisure use – e.g. Redevelopment of public houses, leisure uses, redundant commercial premises etc
- Conversion – e.g. Conversion to flats, change of use from office to residential etc
- Allocated housing site – e.g. Site formally allocated for residential development in the Havant Borough District Wide Local Plan
- Previous open space



The table and graph most strongly show a steady supply from conversions. There is also a low but steady supply from residential garden development. Residential redevelopment (particularly for retirement accommodation) is strong throughout the monitoring period but more sporadic (by its nature).

Calculating the windfall potential for Emsworth

Based on the trend analysis above the following calculation provides what is considered a realistic and justified windfall/unidentified allowance for Emsworth. The most reliable sources of continued supply come from the following:

Residential garden land	average net gain 3.85 dwellings per annum
Residential redevelopment	average net gain 12.14 dwellings per annum
Conversion	average net gain 5.29 dwellings per annum
Total	21.28 dwellings per annum

Over a 7 year period (2019/20 – 2025/26) 148.96 potential dwellings (21.28 x 7) could be delivered from unidentified/windfall development. A 10% reduction is then applied to ensure the calculation is realistic rather than optimistic (148.96 less 10% = 134.06).

Potential windfall/unidentified supply for Emsworth for inclusion in the Local Plan (Allocations):
134 dwellings over the plan period

Summary

A windfall allowance for Emsworth will be included as shown below.

Windfall/Unidentified Delivery for Emsworth							
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
No. of dwellings	19	19	19	19	19	19	20
Total 2019 to 2026 = 134 dwellings							

Havant and Bedhampton: Analysis of windfall/unidentified housing development

Introduction

The adopted Havant Borough Local Plan (Core Strategy) proposes in the region of 1755-1944 net new dwellings to be completed in Havant and Bedhampton between 2006-2026.

Past net new dwelling completions in Havant and Bedhampton

The following table outlines the number of net new completions in Havant and Bedhampton in relation to the overall completions in Havant Borough.

Year	Borough net completions	Havant and Bedhampton net completions	% completions in Havant and Bedhampton
2006/07	236	40	17%
2007/08	390	60	15%
2008/09	252	18	7%
2009/10	145	24	17%
2010/11	231	25	11%
2011/12	168	64	38%
2012/13	249	6	2%
2006-2011	1671	237	14%

Looking in detail at the residential schemes undertaken in Havant and Bedhampton during the period of analysis the data can be broken down by development type.

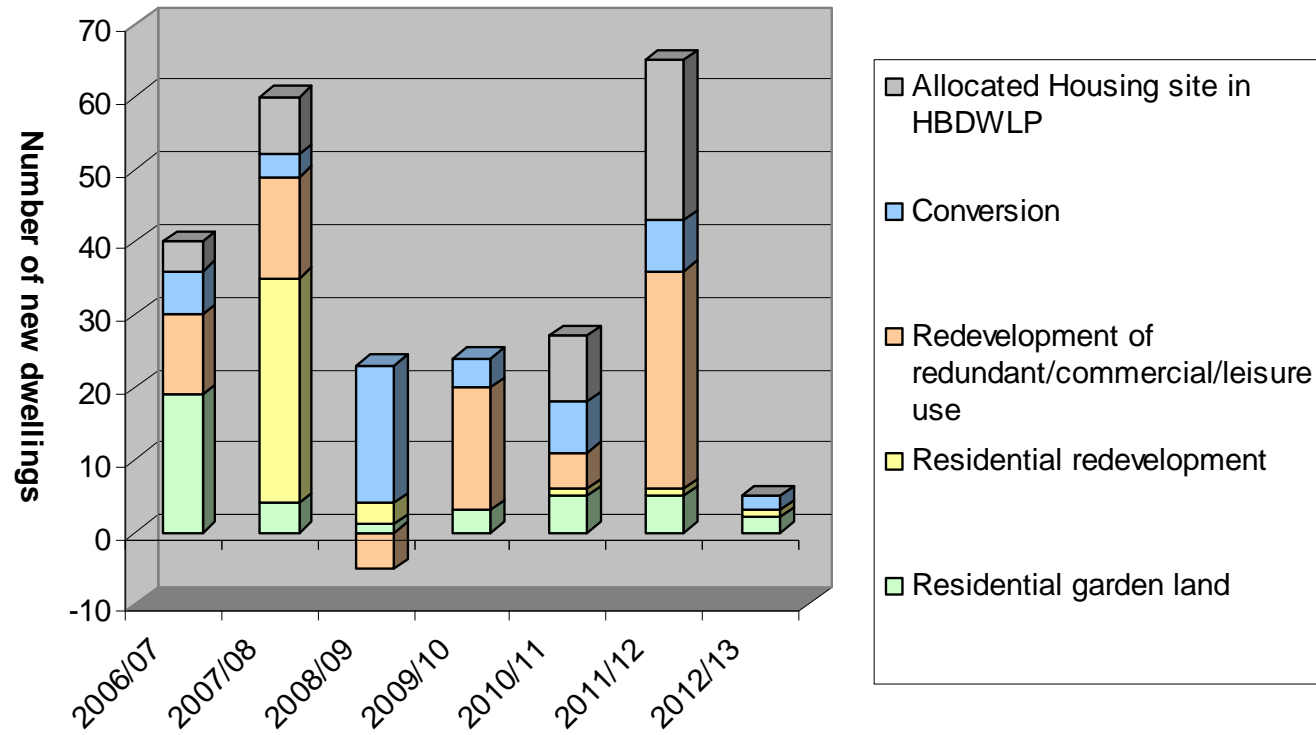
Year	Residential garden land (net)	Residential redevelop-ment (net)	Redevelopment of redundant/ commercial/ leisure use (net)	Conversion (net)	Allocated Housing site in HBDWLP (net)	Previous open space (net)
2006/07	19	0	11	6	4	0
2007/08	4	31	14	3	8	0
2008/09	1	3	-5	19	0	0
2009/10	3	0	17	4	0	0
2010/11	5	1	5	7	9	0
2011/12	5	1	30	7	22	0
2012/13	2	1	0	2	0	0
2006-2013	39	37	72	48	43	0
Average	5.57	5.29	10.29	6.86	n/a (not windfall)	0

(The numbers in the above table will not necessarily equate to the completion data as significant losses that distort the figures have been excluded)

Development Types explained:

- Residential garden land – e.g. New dwellings in existing residential plots and redevelopment of dwelling(s) to provide new/further residential accommodation on a notable larger footprint than the previous building(s)
- Residential redevelopment – e.g. Replacement dwellings, modest additions and then splits to multiple dwellings such as extensions to a single dwelling house followed by conversion to semi-detached (and similar)
- Redevelopment of redundant/commercial/leisure use – e.g. Redevelopment of public houses, leisure uses, redundant commercial premises etc
- Conversion – e.g. Conversion to flats, change of use from office to residential etc
- Allocated housing site – e.g. Site formally allocated for residential development in the Havant Borough District Wide Local Plan
- Previous open space

Residential development by type - Havant and Bedhampton



The above table and graph show a relatively steady supply from conversions, redevelopments of redundant/commercial/leisure use and residential garden land development. Some years show peaks in these categories but provide an otherwise steady supply. A less steady but numerically relevant supply came from residential redevelopment but this was largely from one peak year and will therefore not be used for trend based analysis. Allocations will not be accounted for as these are not windfall.

Calculating the windfall potential for Havant and Bedhampton

Based on the trend analysis above the following calculation provides what is considered a realistic and justified windfall/unidentified inclusion for Havant and Bedhampton. The most reliable sources of continued supply come from the following:

Residential garden land	average net gain 5.57 dwellings per annum
Redevelopment. of redundant/ commercial/ leisure use	average net gain 10.29 dwellings per annum
Conversion	average net gain 6.86 dwellings per annum
Total	22.72 dwellings per annum

Over a 7 year period (2019/20 – 2025/26) 159.04 potential dwellings (22.72 x 7) could be delivered from unidentified/windfall development. A 10% reduction is then applied to ensure the calculation is realistic rather than optimistic (159.04 less 10% = 143.14).

Potential windfall/unidentified supply for Havant and Bedhampton for inclusion in the Local Plan (Allocations):
143 dwellings over the plan period

Summary

A windfall allowance for Havant and Bedhampton will be included as shown below.

Windfall/Unidentified Delivery for Havant and Bedhampton							
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
No. of dwellings	20	20	20	20	21	21	21
Total 2019 to 2026 = 143 dwellings							

Hayling Island: Analysis of windfall/unidentified housing development

Introduction

The adopted Havant Borough Local Plan (Core Strategy) proposes in the region of 660-727 net new dwellings to be completed on Hayling Island between 2006-2026. This is the lowest proportion of all the five areas of the borough in making up the overall 6,300 borough target.

Concern has been raised by some Hayling Island residents that unplanned development (windfall/unallocated sites) has resulted in higher numbers of dwellings being constructed on Hayling Island than planned for and that this will continue. This could raise issues relating to infrastructure, which is a particular issue on Hayling Island. The Planning Policy Team recognises this concern and in turn, the issues relating to Hayling Island were recognised by the Inspector in the examination of the Havant Borough Core Strategy:

"I concur that growth on Hayling Island should be limited/restricted, to take account of flood risk, the need to minimise impacts on the natural environment of Chichester and Langstone harbours and access difficulties on the local road network at peak hours". [Extract from paragraph 9 of the Inspectors Report).

Such local circumstances will be explored further on pages 27 and 28 which provide justification for the inclusion of windfall in Havant Borough.

Net new dwelling completions on Hayling Island

The following table outlines the number of net new completions on Hayling Island in relation to the overall completions in Havant Borough.

Year	Borough net completions	Hayling Island net completions	% completions on Hayling Island
2006/07	236	36	15%
2007/08	390	38	10%
2008/09	252	56	22%
2009/10	145	12	8%
2010/11	231	7	3%
2011/12	168	23	14%
2012/13	249	16	6%
2006-2013	1671	188	11%

Looking in detail at the residential schemes undertaken on Hayling Island during the period of analysis the data can be broken down by development type.

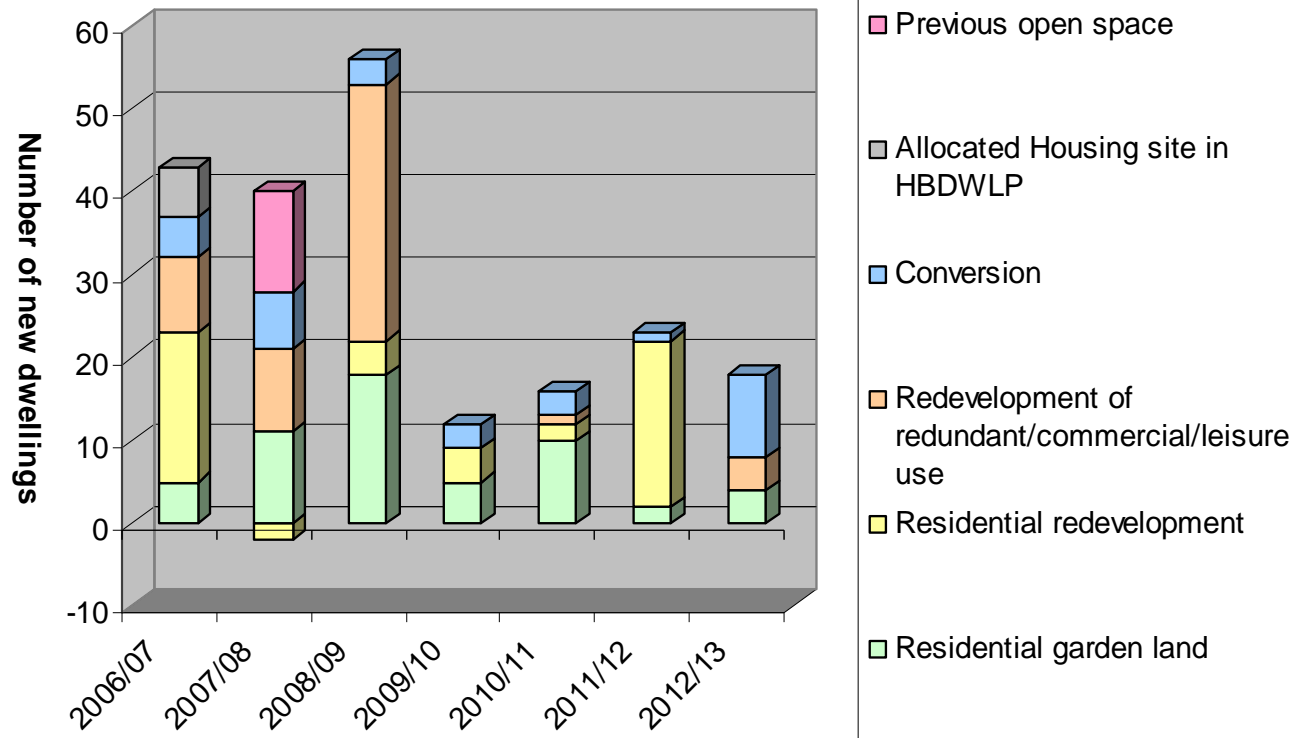
Year	Residential garden land (net)	Residential redevelopment (net)	Redevelopment of redundant/commercial/leisure use (net)	Conversion (net)	Allocated Housing site in HBDWLP (net)	Previous open space (net)
2006/07	5	18	9	5	6	0
2007/08	11	-2	10	7	0	12
2008/09	18	4	31	3	0	0
2009/10	5	4	0	3	0	0
2010/11	10	2	1	3	0	0
2011/12	2	20	0	1	0	0
2012/13	4	0	4	10	0	0
2006-2013	55	46	55	32	6	12
Average	7.86	6.57	7.86	4.57	n/a (not windfall)	1.71

(The numbers in the above table will not necessarily equate to the completion data as significant losses that distort the figures have been excluded)

Development Types explained:

- Residential garden land – e.g. New dwellings in existing residential plots and redevelopment of dwelling(s) to provide new/further residential accommodation on a notable larger footprint than the previous building(s)
- Residential redevelopment – e.g. Replacement dwellings, modest additions and then splits to multiple dwellings such as extensions to a single dwelling house followed by conversion to semi-detached (and similar)
- Redevelopment of redundant/commercial/leisure use – e.g. Redevelopment of public houses, leisure uses, redundant commercial premises etc
- Conversion – e.g. Conversion to flats, change of use from office to residential etc
- Allocated housing site – e.g. Site formally allocated for residential development in the Havant Borough District Wide Local Plan
- Previous open space – the only example of this was land to the north of the Barley Mow Public House which was allowed on appeal

Residential development by type - Hayling Island



The table and graph show a small but steady supply from residential redevelopment and also a strong but less steady supply from residential development on garden land. Supply from conversions is also steady throughout the monitoring period but relatively small in number.

The table also shows that in recent years there has been a significant drop in supply from the redevelopment in redundant/commercial/leisure use and therefore supply from this source is potentially unstable/unjustified. Further supply during the period came from an allocated site and also an allowed appeal on open land. An allocated site is not windfall/unidentified development and the 12 dwellings on open land are unlikely to be a trend repeated in the context of windfall development. Therefore these figures will not be used in calculating future windfall potential.

Calculating the windfall potential for Hayling Island

Based on the trend analysis above the following calculation provides what is considered a realistic and justified windfall/unidentified inclusion for Hayling Island. The most reliable sources of continued supply come from the following:

Residential garden land	average net gain 7.86 dwellings per annum
Residential redevelopment	average net gain 6.57 dwellings per annum
Conversion	average net gain 4.57 dwellings per annum
Total	19 dwellings per annum

Over a 7 year period (2019/20 – 2025/26) 133 potential dwellings (19 x 7) could be delivered from unidentified/windfall development. A 10% reduction is then applied to ensure the calculation is realistic rather than optimistic (133 less 10% = 119.7).

Potential windfall/unidentified supply for Hayling Island for inclusion in the Local Plan (Allocations):
120 dwellings over the plan period

Summary

A windfall allowance for Hayling Island will be included as shown below.

Windfall/Unidentified Delivery for Hayling Island							
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
No. of dwellings	17	17	17	17	17	17	18
Total 2019 to 2026 = 120 dwellings							

Leigh Park: Analysis of windfall/unidentified housing development

Introduction

The adopted Havant Borough Local Plan (Core Strategy) proposes in the region of 1223-1357 net new dwellings to be completed in Leigh Park between 2006-2026.

Past net new dwelling completions in Leigh Park

The following table outlines the number of net new completions in Leigh Park in relation to the overall completions in Havant Borough.

Year	Borough net completions	Leigh Park net completions	% completions in Leigh Park
2006/07	236	76	32%
2007/08	390	131	34%
2008/09	252	123	49%
2009/10	145	54	37%
2010/11	231	134	58%
2011/12	168	30	18%
2012/13	249	6	2%
2006-2011	1671	554	33%

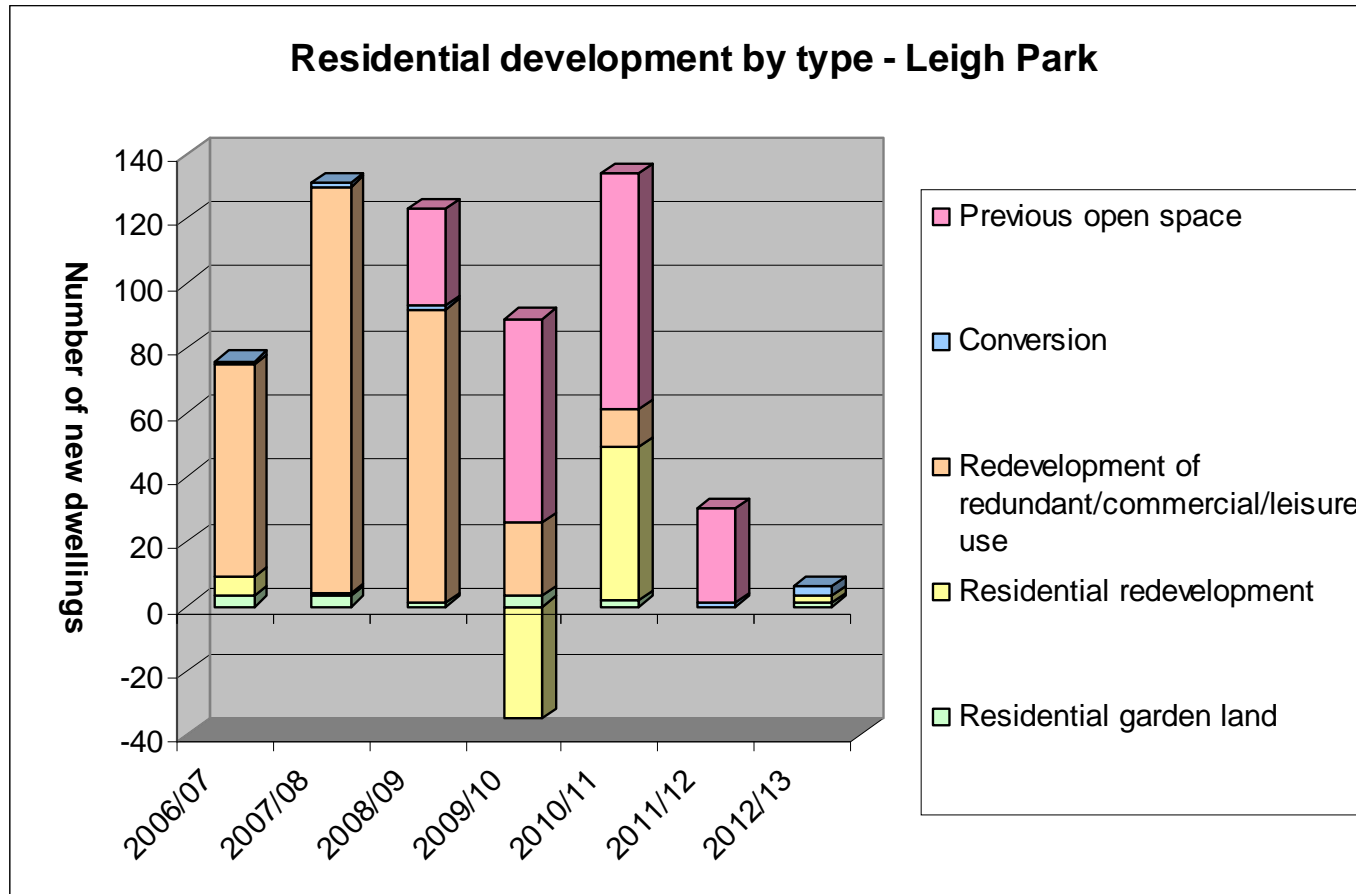
Looking in detail at the residential schemes undertaken in Leigh Park during the period of analysis the data can be broken down by development type.

Year	Residential garden land (net)	Residential redevelopment (net)	Redevelopment of redundant/commercial/leisure use (net)	Conversion (net)	Allocated Housing site in HBDWLP (net)	Previous open space (net)
2006/07	3	6	66	1	0	0
2007/08	3	1	126	1	0	0
2008/09	1	0	91	1	0	30
2009/10	3	-35	23	0	0	63
2010/11	2	47	12	0	0	73
2011/12	0	0	0	1	0	29
2012/13	1	2	0	3	0	0
2006-2013	13	21	318	7	0	195
Average	1.86	3	45.43	1	n/a (not windfall)	27.86

(The numbers in the above table will not necessarily equate to the completion data as significant losses that distort the figures have been excluded)

Development Types explained:

- Residential garden land – e.g. New dwellings in existing residential plots and redevelopment of dwelling(s) to provide new/further residential accommodation on a notable larger footprint than the previous building(s)
- Residential redevelopment – e.g. Replacement dwellings, modest additions and then splits to multiple dwellings such as extensions to a single dwelling house followed by conversion to semi-detached (and similar)
- Redevelopment of redundant/commercial/leisure use – e.g. Redevelopment of public houses, leisure uses, redundant commercial premises etc
- Conversion – e.g. Conversion to flats, change of use from office to residential etc
- Allocated housing site – e.g. Site formally allocated for residential development in the Havant Borough District Wide Local Plan
- Previous open space



The table and graph above show a significant supply from the redevelopment of redundant/commercial/leisure use. However, this is mostly from a single site (the former Procter and Gamble factory site). The scale of such provision is not likely to be repeated in the Leigh Park area. Another significant supply came from previous open space which is solely made up from two sites; Parkhouse School Playing Fields and Ramsdale Playing Field. This scale and type of development is not envisaged from unallocated/unidentified sites in the future. This leaves a small but steady supply from residential garden land and some smaller scale steady supply from conversions and redundant/commercial/leisure use (when the 275 completions from the Procter and Gamble site are excluded), and also some supply from residential redevelopment.

Calculating the windfall potential for Leigh Park

Based on the trend analysis above the following calculation provides what is considered a realistic and justified windfall/unidentified inclusion for Leigh Park. The most reliable sources of continued supply come from the following:

Residential garden land	average net gain 1.86 dwellings per annum
Residential redevelopment	average net gain 3 dwellings per annum
Conversions	average net gain 1 dwelling per annum
Redevelopment. of redundant/ commercial/ leisure use	average net gain 6.14 dwellings per annum $[(318 - 275) / 7]$
Total	12 dwellings per annum

Over a 7 year period (2019/20 – 2025/26) 84 potential dwellings (12 x 7) could be delivered from unidentified/windfall development. A 10% reduction is then applied to ensure the calculation is realistic rather than optimistic (84 less 10% = 75.6).

Potential windfall/unidentified supply for Leigh Park for inclusion in the Local Plan (Allocations):
76 dwellings over the plan period

Summary

A windfall allowance for Leigh Park will be included as shown below.

Windfall/Unidentified Delivery for Leigh Park							
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
No. of dwellings	10	11	11	11	11	11	11
Total 2019 to 2026 = 76 dwellings							

Waterlooville: Analysis of windfall/unidentified housing development

Introduction

The adopted Havant Borough Local Plan (Core Strategy) proposes in the region of 1917-2126 net new dwellings to be completed in Waterlooville between 2006-2026.

Past net new dwelling completions in Waterlooville

The following table outlines the number of net new completions in Waterlooville in relation to the overall completions in Havant Borough.

Year	Borough net completions	Waterlooville net completions	% completions in Waterlooville
2006/07	236	67	28%
2007/08	390	106	27%
2008/09	252	52	21%
2009/10	145	49	34%
2010/11	231	26	11%
2011/12	168	42	25%
2012/13	249	172	69%
2006-2013	1671	514	31%

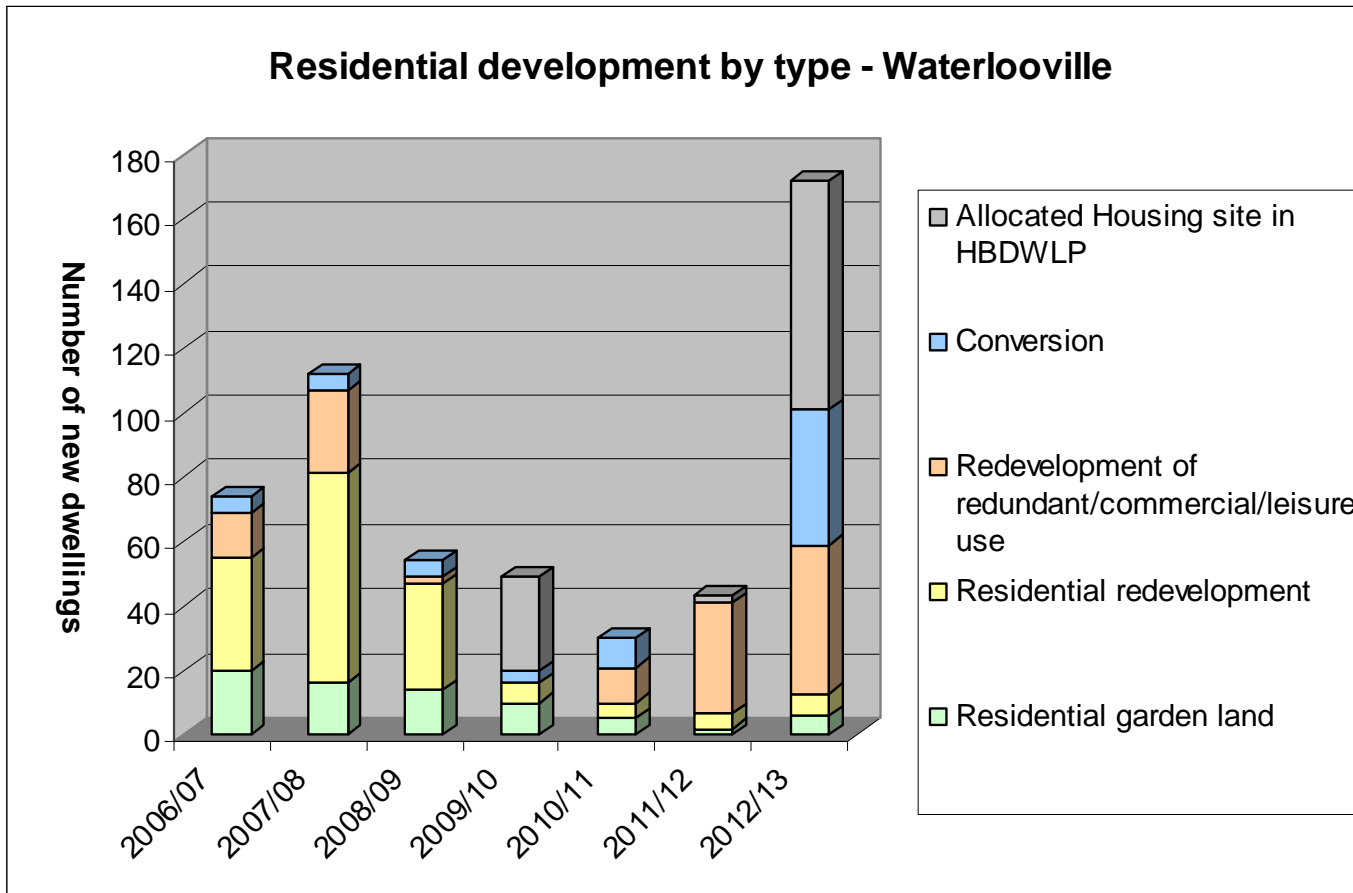
Looking in detail at the residential schemes undertaken in Waterlooville during the period of analysis the data can be broken down by development type.

Year	Residential garden land (net)	Residential redevelopment (net)	Redevelopment of redundant/commercial/leisure use (net)	Conversion (net)	Allocated Housing site in HBDWLP (net)	Previous open space (net)
2006/07	20	35	14	5	0	0
2007/08	16	65	26	5	0	0
2008/09	14	33	2	5	0	0
2009/10	10	6	0	4	29	0
2010/11	5	5	11	9	0	0
2011/12	2	5	34	0	2	0
2012/13	6	7	46	42	71	0
2006-2013	73	156	133	70	102	0
Average	10.43	22.29	19	10	n/a (not windfall)	0

(The numbers in the above table will not necessarily equate to the completion data as significant losses that distort the figures have been excluded)

Development Types explained:

- Residential garden land – e.g. New dwellings in existing residential plots and redevelopment of dwelling(s) to provide new/further residential accommodation on a notable larger footprint than the previous building(s)
- Residential redevelopment – e.g. Replacement dwellings, modest additions and then splits to multiple dwellings such as extensions to a single dwelling house followed by conversion to semi-detached (and similar)
- Redevelopment of redundant/commercial/leisure use – e.g. Redevelopment of public houses, leisure uses, redundant commercial premises etc
- Conversion – e.g. Conversion to flats, change of use from office to residential etc
- Allocated housing site – e.g. Site formally allocated for residential development in the Havant Borough District Wide Local Plan
- Previous open space



The table and graph show a steady supply from conversions with a 2012/13 peak (largely due to the Raebarn House and Silvester House conversions). A steady supply from residential garden land is also shown. A particularly strong supply had previously come from residential redevelopment but this has reduced in recent years. Redevelopment of redundant/commercial/leisure use provided a slightly sporadic but significant supply. Taking this into account residential garden land, the redevelopment of redundant/commercial/leisure use and conversions remain a strong source of supply but to justify the inclusion of residential redevelopment the average trend from most recent years should be taken forward.

Calculating the windfall potential for Waterlooville

Based on the trend analysis above the following calculation provides what is considered a realistic and justified windfall/unidentified inclusion for Waterlooville. The most reliable sources of continued supply come from the following:

Residential garden land	average net gain 10.43 dwellings per annum
Residential redevelopment	average net gain 5.75 dwellings per annum (based on average of last 4 years)
Redevelopment of redundant/ commercial/ leisure use	average net gain 19 dwelling per annum
Conversion	average net gain 4 dwellings per annum (excluding last year's peak)
Total	39.18 dwellings per annum

Over a 7 year period (2019/20 – 2025/26) 274.26 potential dwellings (39.18 x 7) could be delivered from unidentified/windfall development. A 10% reduction is then applied to ensure the calculation is realistic rather than optimistic (274.26 less 10% = 246.83).

Potential windfall/unidentified supply for Waterlooville for inclusion in the Local Plan (Allocations):
247 dwellings over the plan period

Summary

A windfall allowance for Waterlooville will be included as shown below.

Windfall/Unidentified Delivery for Waterlooville							
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
No. of dwellings	35	35	35	35	35	36	36
Total 2019 to 2026 = 247 dwellings							

Local Circumstances and Justification for including Windfall Allowance

The key reason and justification for the inclusion of an allowance for windfall development is that in the past it has formed a significant part of the overall number of new dwellings completed in the borough. With a presumption in favour of sustainable development (when in accordance with the Local Plan), there is no reason to believe it would not continue to form a notable part of the overall supply of new housing. The NPPF also recognises the role of windfall development in overall housing supply.

In addition, there are local circumstances which would make it inappropriate for the Local Planning Authority to significantly exceed its overall planned housing requirement. This is explained further below. With that in mind, it is appropriate to achieve a balance between avoiding significant provision above the plan period target for new housing, whilst allowing for flexibility in delivery and ensuring the plan target is met.

Local Circumstances

The development of significantly more than the 6,300 dwelling requirement for the borough (i.e. the Core Strategy objective) could result in the following issues:

- Hayling Island has recognisable limitations for infrastructure. In particular the capacity with just one road on and off the Island with resulting emergency service access/difficultly etc. This was identified in the Council's Core Strategy and reflected in Hayling Island having a lower housing requirement than other areas. Crucially, it was also recognised and referred to specifically in the Inspector's Report on the Core Strategy (see page 15 of this paper)
- The capacity of the Strategic Road Network (SRN) is such that, in many places, development significantly above the 6,300 requirement may give rise to capacity issues at key junctions. If such development were to occur in a piecemeal nature then it is unlikely the necessary infrastructure requirements could be sought (as part of the planning decision process) in an effective and efficient way. The impact to the SRN was a significant issue at the Core Strategy Examination in Public where the Highways Agency's concerns about these issues were heard
- Nature/Environmental Designations are a significant issue in the borough. With international and national environmental designations in and adjacent to the borough, increased human activity and resulting impact and disturbance of protected habitats/species is of major concern. This can only be appropriately managed and mitigated through a planned way looking at the cumulative impacts from development. Unplanned development significantly beyond the 6,300 dwellings may result in a significant detrimental impact on protected habitats and species that would undermine European legislation and would be contrary to the objectives/policies of the Core Strategy

- The Council have worked, and continue to work, closely with infrastructure providers in relation to health, school places etc. to ensure that the necessary infrastructure is in place to support new development. Development significantly over that outlined in the Core Strategy will have a detrimental impact on the ability of these infrastructure providers to properly plan for these needs

Other Justification

- From 2006 to 2013, 1,481 of the net new dwellings completed in the borough (88% of the total net completions) have been on sites not formally allocated and which were at one time unidentified/windfall sites. This demonstrates a strong history of supply from windfall development in the urban area
- From 2006 to 2013, 207 of the net new dwellings completed have been on garden land (over 12% of total net completions). The Council remains open to appropriate forms of development on garden land when it is sensitive and reflective of the surrounding built form and residential amenity. By its very nature, this is difficult to predict, but with much of the borough being of suburban nature delivery from this source is highly likely
- In accordance with the aims of the NPPF, and a general desire to develop brownfield (PDL) rather than greenfield sites (as supported by Policy CS17 of the adopted Core Strategy), the Council would not wish to effectively over-allocate for development requirements on greenfield sites when it is confident local circumstances and past trends would indicate a good supply from windfall sites. Windfall sites are often in sustainable locations and the concentration of development within the existing urban areas will save open countryside much valued by our communities
- Community uses are currently protected through a criteria-based policy in the Core Strategy (DM2). Although the Council would want to see them retained for community function, the criteria of the policy could be met and it is quite realistic that some sites may become available for residential development, rather than being left unused. These are often the 'sporadic' type of development largely excluded from the trend-based analysis earlier in this paper, but which could still form a notable part of overall supply during the plan period

Consideration of the SHLAA

- Since 2007, the Council's SHLAA has been clear that it is unrealistic to have listed potential sites under 5 dwellings and therefore continued unidentified supply from this source is highly likely
- In accordance with the NPPF (previously PPS25), many potential sites have been discounted from the SHLAA process due to flood risk but, through specific negotiation with the Environment Agency (through the inclusion of acceptable flood risk adaptation/mitigation), they

may reach an acceptable conclusion through the Development Management/planning application process. With large areas of the borough effected by potential flood risk, a currently unidentifiable supply may arise from this source

Future Approach

It is considered that the above analysis provides the necessary justification for the inclusion of a windfall allowance. This will be assessed through the on-going plan/monitor/manage approach which includes annual assessments of progress in relation to housing delivery and supply as part of the Council's Annual Monitoring Report.