

**PLANNING,
DEVELOPMENT
& REGENERATION**

**Chichester
District
Council
5YHLS Critical
Friend
Review**

5YHLS Critical Friend Review

Chichester District Council
September 2021

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This document has been prepared and checked in accordance with the Lambert Smith Hampton Quality Assurance procedures and authorised for release.

Signed: 

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For and on behalf of Lambert Smith Hampton

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1.0 INTRODUCTION

1.1 Overview

- 1.1.1 Lambert Smith Hampton have been appointed by Chichester District Council to undertake Critical Friend Review of the Council's draft 5YHLS report and to also prepare evidence to support the Council's position on a Windfall allowance and lead-in and build-out rates of residential development sites.
- 1.1.2 This assessment provides robust and up to date evidence which can be utilised in the 5YHLS position and also the Council's emerging Local Plan.
- 1.1.3 This report has been prepared in accordance with National Planning Policy and Guidance as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), it has also taken into consideration LSH's experience of presenting evidence at Public Inquiries on housing land supply matters, in particular in Chichester District on behalf of the Council.

1.2 Study Scope

- 1.2.1 This report provides a robust assessment based on both wide-ranging data analysis as well as contextual evaluation. The report provides:
- Review of the Council's draft 5YHLS position, both in how judgements on deliverability are reached and the presentation of evidence
 - Evidence to support a windfall allowance
 - Evidence to support lead in times
 - Evidence to support build out rates

2.0 Lead in Analysis

2.1 Introduction

2.1.1 The analysis of lead in times for residential development is an important step in understanding how long it will take a deliverable site to reach its first completion on site. Understanding this in greater detail will allow the Council to prepare a more accurate housing trajectory.

2.1.2 A total of 66 sites were reviewed to establish robust lead in times for sites of various sizes. The analysis considered the time taken from the first permission granted on site which led to the first dwelling being completed.

2.1.3 The analysis was carried out on a range of sites to understand if there was any differentiation between the size of site and how long it took to reach the first completion. The sites were grouped into the following categories

- Sites of 10 to 50 dwellings (44 sites reviewed)
- Sites of 51 to 100 dwellings (9 sites reviewed)
- Sites of 101 to 250 dwellings (9 sites reviewed)
- Sites of 251 dwellings or more (3 sites reviewed)

2.1.4 Here the time between the first permission and first completion has been calculated. This is a conservative assessment as the completion date is aligned to the end of monitoring year (31st March) for most of the sites when in fact the completion is likely to be earlier in the year which would thereby shorten the lead in time.

2.2 Lead in analysis

i) Sites of 10 to 50 dwellings

2.2.1 The table below shows the lead in analysis for sites between 10-50 dwellings. Here, 44 sites have been used and the date between the first permission and first completion has been calculated.

2.2.2 This shows that the average lead in time is 1.22 years (447 days or 14.68 months) for sites between 10-59 dwellings.

Table 1: Lead in analysis – 10-50 dwellings

Site Reference	Date of 1 st Permission	Date of 1 st Completion	Time analysis (days)	Time analysis (months)	Time analysis (years)
160	29-01-09	31-03-12	1157	38.04	3.17
59	16-06-10	31-03-12	654	21.50	1.79
316	07-10-10	31-03-12	541	17.79	1.48
40	27-03-13	31-03-14	369	12.13	1.01
41	28-11-07	16-08-13	2088	68.65	5.72
76	30-10-13	31-03-14	152	5.00	0.42
312	20-06-14	31-03-15	284	9.34	0.78
389	20-03-13	31-03-13	11	0.36	0.03
394	18-09-13	31-03-15	559	18.38	1.53
49	23-09-14	28-11-14	66	2.17	0.18
82	08-03-12	31-03-15	1118	36.76	3.06
90	14-04-14	31-03-15	351	11.54	0.96
114	27-11-13	31-03-14	124	4.08	0.34
336	09-01-14	31-03-15	446	14.66	1.22
52	29-01-16	31-03-16	62	2.04	0.17
91	23-05-16	31-03-17	312	10.26	0.85
126	14-12-15	31-03-17	473	15.55	1.30
172	15-12-15	31-03-16	107	3.52	0.29
175	24-10-14	31-03-17	889	29.23	2.44
350	20-01-16	31-03-16	71	2.33	0.19
85	05-03-14	31-03-15	391	12.85	1.07
119	08-04-15	31-03-15	8	0.26	0.02
53	03-03-17	31-03-18	393	12.92	1.08
118	27-10-16	31-03-17	155	5.10	0.42
129	07-12-16	31-03-17	114	3.75	0.31
221	04-04-14	31-03-16	727	23.90	1.99
358	21-09-16	31-03-18	556	18.28	1.52
415	24-05-16	31-03-17	311	10.22	0.85
86	31-08-17	31-03-18	212	6.97	0.58
120	13-10-17	31-03-18	169	5.56	0.46
237	22-08-16	31-03-18	586	19.27	1.61
68	19-09-18	31-03-19	193	6.35	0.53
253	22-05-18	31-03-19	313	10.29	0.86
433	24-07-18	31-03-19	250	8.22	0.68
537	21-05-15	31-03-17	680	22.36	1.86
267	13-07-20	15-03-21	245	8.05	0.67
96	13-03-19	20-09-19	191	6.28	0.52
63	04-09-18	31-03-19	208	6.84	0.57
264	20-05-19	31-03-21	681	22.39	1.87
045a (2014)	15-08-11	31-03-13	594	19.53	1.63
045b (2017)	22-07-13	31-03-16	983	32.32	2.69
57	13-07-13	31-03-15	626	20.58	1.72
337	14-02-14	31-03-15	410	13.48	1.12
121	30-12-14	31-03-17	822	27.02	2.25
Average			446.64 days	14.68 months	1.22 years

ii) Sites of 51 to 100 dwellings

2.2.3 The table below shows the lead in analysis for sites between 51 and 100 dwellings. Here the time between the first permission and first completion has been taken for 9 sites.

2.2.4 This shows that the average lead in time for sites between 51 and 100 dwellings is 489 days or 16 months, or 1.34 years.

Table 2: Lead in analysis – 51 to 100 dwellings

Site Reference	Date of 1 st Permission	Date of 1 st Completion	Time analysis (days)	Time analysis (months)	Time analysis (years)
31	14-12-15	31-03-16	108	3.55	0.30
83	08-04-16	31-03-17	357	11.74	0.98
365	12-07-17	31-03-18	262	8.61	0.72
80	23-12-19	31-03-20	99	3.25	0.27
84	07-10-11	31-03-12	176	5.79	0.48
286	04-04-13	31-03-14	361	11.87	0.99
244	06-11-19	31-03-21	511	16.80	1.40
203	15-10-15	31-03-19	1263	41.52	3.46
238	13-09-16	28-02-20	1263	41.52	3.46
Average			488.89 days	16.07 months	1.34 years

iii) Sites of 101 to 250 dwellings

2.2.5 The table below shows the lead in analysis for sites between 101 and 250 dwellings. Here the time between the first permission and first completion has been taken for 10 sites.

2.2.6 This shows that the average lead in time for sites between 101 and 250 dwellings is 341 days, 11 months, and 0.93 years.

Table 3: Lead in analysis – 101 to 250 dwellings

Site Reference	Date of 1 st Permission	Date of 1 st Completion	Time analysis (days)	Time analysis (months)	Time analysis (years)
290	18-03-11	13-01-12	301	9.90	0.82
48	20-06-13	31-03-14	284	9.34	0.78
414	15-05-17	31-03-18	320	10.52	0.88
530	17-08-15	31-03-16	227	7.46	0.62
532	26-06-17	31-03-18	278	9.14	0.76
78	01-04-15	31-03-16	365	12.00	1.00
263	17-01-18	31-03-18	73	2.40	0.20
348	12-04-17	31-03-18	353	11.61	0.97
184	12-11-10	31-03-13	870	28.60	2.38
Average			341.22 days	11.22 months	0.93 years

iv) Sites of 251 dwellings and over

2.2.7 The table below shows the lead in analysis for sites over 251 dwellings. Here the time between the first permission and first completion has been taken for 3 sites.

2.2.8 This shows that the average lead in time for sites over 251 dwellings is 260 days, 9 months, and 0.71 years.

Table 4: Lead in analysis –251+ dwellings

Site Reference	Date of 1 st Permission	Date of 1 st Completion	Time analysis (days)	Time analysis (months)	Time analysis (years)
236	01-03-11	13-01-12	318	10.45	0.87
34	04-10-18	31-03-19	178	5.85	0.49
75	21-06-16	31-03-17	283	9.30	0.78
Average			259.67 days	8.54 months	0.71 years

2.3 Lead in Analysis Summary and Recommendations

2.3.1 The above assessment has analysed the lead in times for sites in Chichester District.

2.3.2 A summary of the assessment is provided in the table below:

Table 5: Lead in Analysis Summary

Site Size	Sample Size	Time analysis (days)	Time analysis (months)	Time analysis (years)
10-50 dwellings	44	446.64 days	14.68 months	1.22 years
51-100 dwellings	9	488.89 days	16.07 months	1.34 years
101-250 dwellings	9	341.22 days	11.22 months	0.93 years
251 dwellings and over	3	259.67 days	8.54 months	0.71 years
101 dwellings and over	12	320.83 day	10.55 months	0.88 years

2.3.3 We recommend that these lead in times are used as a baseline for which the developers and Council's assumptions are compared against.

2.3.4 With regard to the category of 251+ dwellings, as there is a sample size of just three, we recommend that the additional category of 101+ dwellings is used as a baseline, due to the additional validity provided by a larger sample size.

3.0 Build Out Analysis

3.1 Introduction

3.1.1 The analysis of build out rates is an important step in understanding how long it will take for a site to complete. Understanding this in greater detail will allow the Council to prepare a more accurate housing trajectory.

3.1.2 A total of 62 sites were reviewed to establish robust build out rates for sites of various sizes. The analysis considered the average annual delivery on sites.

3.1.3 The analysis was carried out on a range of sites to understand if there was any differentiation between the size of site and how long it took to reach the first completion. The sites were grouped into the following categories:

- Sites of 10 to 50 dwellings (47 sites reviewed)
- Sites of 51 to 100 dwellings (5 sites reviewed)
- Sites of 101 to 250 dwellings (6 sites reviewed)
- Sites of 251 dwellings or more (3 sites reviewed)

3.2 Build out analysis

i) Sites of 10 to 50 dwellings

3.2.1 The table below shows the build out rate analysis for sites between 10-50 dwellings. Here, 47 sites have been analysed and the average annual completions has been calculated.

3.2.2 This shows that the average delivery for sites between 10-50 dwellings is 17 dwellings per annum.

Table 6: Build out rate analysis – 50 – 100 dwellings

Site Reference	Site Total	Average delivery per annum
059	31	15.5
160	28	28
290	15	15
045	22	22
045	20	20
040	18	18
041	10	10
049	25	25
052	21	12
053	16	16
057	24	24
063	10	10
068	20	22
076	11	11
063	10	10
068	20	22
394	50	25
337	20	10
114	15	15
336	10	10
XV	17	17
312	50	25
WE	16	8
350	20	20
172	30	16
091	30	15
358	17	17
EW	26	26
237	35	35
120	25	12.5
XV	10	10
129	43	21.5
086	11	11
175	25	9
253	25	25
433	10	10
096	10	10
264	26	26
ZV	16	16
090	28	14
NM	25	25
114	15	15
CH	16	16
389	17	17
040	18	18
082	11	11
119	12	6.5
Average		16.87 dpa

ii) *Sites of 51 to 100 dwellings*

3.2.3 The table below shows the build out rate analysis for sites between 51-100 dwellings. Here, 5 sites have been analysed and the average annual completions has been calculated.

3.2.4 This shows that the average delivery for sites between 51-100 dwellings is 46 dwellings per annum.

Table 7: Build out rate analysis – 51 – 100 dwellings

Site Reference	Site Total	Average delivery per annum
031	99	49.5
316	86	28
286	94	94
TG	62	31
365	55	27.5
Average		46.07 dpa

iii) *Sites of 101 to 200 dwellings*

3.2.5 The table below shows the build out rate analysis for sites between 101-200 dwellings. Here, 6 sites have been analysed and the average annual completions has been calculated.

3.2.6 This shows that the average delivery for sites between 101-200 dwellings is 43 dwellings per annum.

Table 8: Build out rate analysis – 101 – 200 dwellings

Site Reference	Site Total	Average delivery per annum
048	112	37
078	160	40
414	110	37
SB	159	37
184	160	43
263	108	62
Average		42.67 dpa

iv) *Sites of 251 dwellings or more*

3.2.7 The table below shows the build out rate analysis for sites of 251 dwellings or more. Here, 3 sites have been analysed and the average annual completions has been calculated.

3.2.8 This shows that the average delivery for sites of 251 dwellings is 52 dwellings per annum.

Table 9: Build out rate analysis – 251 dwellings or more

Site Reference	Site Total	Average delivery per annum
236	252	50
0	398	64
034	290	51
Average		52.22 dpa

3.3 Conclusions and Recommendations

3.3.1 The above assessment has analysed the build out rates for sites in Chichester District.

3.3.2 A summary of the assessment is provided in the table below:

Table 10: Lead in Analysis Summary

Site Size	Sample Size	Average Build out Rate (dpa)
10-50 dwellings	44	16.87 dpa
51-100 dwellings	9	46.07 dpa
101-250 dwellings	10	42.67 dpa
251 dwellings and over	3	52.22 dpa

3.3.3 These findings compared to the most recent PLC house builder statements show the average past build rates in Chichester are higher. The lower completion rates shown in table 11 below will be as a result of Covid-19 impacts to house building. It will be important to review the next annual or half annual reports from these PLC house builders to identify if completion rates have increased after Covid-19 restrictions were removed.

3.3.4 This data was sourced from the annual performance reports or half year reports that most national housebuilders prepare and publish.

Table 11: National Housebuilder Completions per outlet

Housebuilder	Source	Completions per outlet
Persimmon	Annual Report 2020	34 completions per outlet
Crest Nicholson	Half year results 2021	57 completions per outlet
Taylor Wimpey	Annual Report 2020	40 completions per outlet
Barratt/David Wilson	Annual Report 2020	34 completions per outlet
Bellway	Annual Report 2020	27 completions per outlet
Redrow	Half year results 2021	26 completions per outlet
Miller Homes	Annual Report 2020	32 completions per outlet
Countryside Properties	Annual Report 2020	64 completions per outlet
Average		39 completions per outlet

3.3.5 Therefore, we recommend that the build out rates as shown in table 10 should be used as a baseline assessment for which the lead in times are applied in the trajectory.

4.0 Windfall Assessment

4.1 Introduction

- 4.1.1 This section of the report provides the Council with a detailed and up to date assessment of windfall residential development within Chichester District. Over a number of years the supply of residential development from Local Plan allocations has remained low, despite this housing delivery has passed the Government's Housing Delivery Test (HDT).
- 4.1.2 Over the last five years the level of completions from Windfall in the district has been between 149 and 470 dwellings, however the Council have only had a relatively small windfall allowance in their 5YHLS assessments. Given the disparity between monitoring and future projections, LSH advised the Council that this matter should be looked into in further detail.

4.2 National Policy and Guidance

- 4.2.1 As defined by the National Planning Policy Framework (NPPF) in Annex 2, windfall sites are sites that are not specifically identified in the development plan.
- 4.2.2 Paragraph 71 of the NPPF states that anticipated supply figures can include a windfall allowance, and that it should be realistic and based on historic trends:

"Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area."

- 4.2.3 The Planning Practice Guidance (PPG) sets out the method for assessing Housing and Economic Land Availability. Stage 3 sets out the method for undertaking a windfall assessment. This states that:

"A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 [now paragraph 71 above] of the National Planning Policy Framework.

Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 67 [now paragraph 68] of the National Planning Policy Framework)."

4.3 Methodology

- 4.3.1 Based on the NPPF and PPG, the stipulating requirements from national policy and guidance, using a windfall allowance is justified if there is compelling evidence which has regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Therefore, working with the Council, we have prepared a methodology to assess Chichester District Council's historic windfall rates and consider those trends which will continue to be a reliable source in the future.
- 4.3.2 The assessment period used covers 2012 to 2021, allowing us to analyse 10 years of data where a consistent methodology of monitoring and recording has been used by the Council on windfalls.
- 4.3.3 Information used in this assessment includes the following categories:
- Year of dwelling completion
 - Number of dwellings in the permission (net)
 - Green field or Previously Developed Land
 - Previous land use, the categories used by the Council are:
 - Agricultural (both Greenfield land and agricultural conversions)
 - Business
 - Garden
 - Industrial
 - Institution
 - Minerals and Waste
 - Office
 - Other
 - Residential
 - Shopping
 - Storage
- 4.3.4 The dwelling completion figures are NET, therefore any losses, for example in residential conversion, are taken into account.

i) Step 1 – Windfall Overview

4.3.5 The first step in the windfall analysis was to review the total amount of windfall completions each year in the District as a proportion of total completions. This showed that windfall completions have ranged from 149 and 470 between 2012 and 2021. Windfall completions were at their highest from 2016 to 2019 where completions were in excess of 400 dwellings per annum.

Table 12: Net Windfall completions 2012-2021

Year	Total Net Windfall Completions	Total Completions	Windfall as a percentage	5YHLS Yes or No?	Status of Development Plan
2011/12	306	353	87%	Yes	Emerging local plan
2012/13	307	307	100%	No	Emerging local plan
2013/14	202	202	100%	Yes	Emerging local plan
2014/15	270	351	77%	Yes	Local Plan adopted July 2015
2015/16	460	507	91%	Yes	Adopted Local Plan
2016/17	403	439	92%	Yes	Adopted Local Plan
2017/18	470	557	84%	Yes	Adopted Local Plan
2018/19	464	654	71%	Yes	Adopted Local Plan
2019/20	323	503	64%	Yes from April to July	Local Plan out of date July 2020
2020/21	149	456	33%	No	Local Plan out of date

4.3.6 To understand in general why windfall levels were high in years 2016 to 2019 we considered what the Council’s 5YHLS position was in each year and also what the status of the Local Plan was, either being prepared, adopted or more than 5 years old.

4.3.7 The table above would suggest that that windfall completions in Chichester have been more effected by issues other than the status of the local plan, or the presence of a five year housing land supply; whereby total windfall completions are lowest in 2011 to 2014, when the impacts of the 2008 recession were still impacting on the house building sector, and in 2021 when the immediate impacts of the covid-19 pandemic took place.

ii) Step 2 – Review of Greenfield or PDL

4.3.8 Following the overview analysis of windfalls in the plan area, we then considered how this was split between PDL and Green field sites.

Table 13: Windfall completions 2012-2021, Previous Developed Land / Greenfield

Year	PDL	Green field	Total
2012	223	83	306
2013	261	46	307
2014	179	23	202
2015	112	158	270
2016	238	222	460
2017	236	167	403
2018	277	193	470
2019	235	229	464
2020	86	237	323
2021	78	71	149

4.3.9 Our analysis shows that the supply of windfalls from both PDL and Green field sources was consistent through the assessment period, on average annually, PDL developments contributed 193 dwellings to the windfall supply and Green field developments contributed 143 dwellings. The higher proportion of PDL to Green field was experienced in all but two of the years assessed – 2015 and 2020.

4.3.10 Therefore, going forward into the next steps of the assessment, we have included both PDL and Green field developments in the assessment without the need to split them into two distinct categories.

iii) Step 3 – Review of Previous Use

4.3.11 National policy states that windfall development should be a reliable source going forward and therefore it is important to understand where the supply of windfall has come from in the past. Has the supply been comprised of large one off developments, or is it sourced from changes of use from one type of development that has slowly been exhausted over the years?

4.3.12 The Council have categorised previous land use into 11 categories as shown in the table below. The total windfall completion for each year was split into these categories to identify where windfall development has been occurring on a consistent basis.

Table 14: Windfall Completions 2012-2021, by previous land use

Year	Agricultural (Greenfield and Conversion)	Business	Garden	Industry	Institution	Minerals and Waste	Office	Other	Residential	Shopping	Storage	Total
2012	54	3	19	17	35	19	35	38	81	4	1	306
2013	27	5	18	57	47	18	59	58	16	1	1	307
2014	21	29	23	46	62	0	4	26	-9	0	0	202
2015	120	18	5	6	1	0	9	105	-19	8	17	270
2016	190	18	37	0	0	0	23	74	119	-1	0	460
2017	180	0	11	0	0	0	12	168	25	2	5	403
2018	230	6	13	42	0	0	8	111	43	9	8	470
2019	248	8	12	1	8	0	17	72	87	11	0	464
2020	232	35	6	0	6	0	4	9	25	6	0	323
2021	57	30	5	0	0	0	26	10	5	3	13	149
Average	136	15	15	17	16	4	20	67	37	4	5	335

4.3.13 The table shows that there has been consistent windfall development from the previous land uses of: Agricultural, Office, Residential, and Other. These sources have been coloured in green in the table above and have been kept in for additional analysis of completions.

4.3.14 The table above also shows that there has been inconsistent windfall completions on land previously used for: business, gardens, industry, minerals and waste, shopping and storage. These completions have been coloured in red and have been removed as sources of supply from the windfall assessment due to inconsistent delivery.

iv) Step 4 – Analysis by Site Size

4.3.15 The next step was to look at the size of developments contributing to past levels of windfall within the sources of supply (green) carried forward from step 3 (table 3). This analysis was to identify how consistent the supply was from sites within certain size ranges.

4.3.16 The size groups used were as follows:

- 9 dwellings and Less (Minor scale development)
- Between 10 and 50 dwellings
- Between 51 and 100 dwellings
- Between 101 and 250 dwellings
- 251 dwellings and above

4.3.17 The table below (table 4) shows the windfall completions from the sources taken forward from step 3 on sites of 9 dwellings or less. This shows that windfall completions have been consistent on all the previous land uses of agricultural, office, residential, and other, and therefore they provide reliable supply and have been taken forward as part of the assessment.

Table 15: Windfall completions (9 dwellings or less) carried forward from Step 3, by previous land use

Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential	Total
2012	20	1	2	42	65
2013	12	9	8	16	45
2014	3	4	4	-27	-16
2015	24	9	22	9	64
2016	28	23	19	22	92
2017	45	12	18	21	96
2018	29	8	8	41	86
2019	36	17	11	61	125
2020	37	4	9	25	75
2021	5	0	3	-2	6
Average	24	9	10	21	63.8

4.3.18 The table below (table 5) shows the windfall completions from the sources taken forward from step 3 between 10 and 50 dwellings. This shows that windfall completions between 10-50 dwellings on previous office land are inconsistent (coloured red) and therefore have been removed from the windfall assessment. Windfall developments of 10-50 dwellings on previous land uses of agriculture, residential, and other uses show consistent delivery between 2012-2021 (coloured green) have been taken forward in the windfall supply assessment.

Table 16: Windfall completions (10-50 dwellings) carried forward from Step 3 by previous land use

Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential	Total
2012	34	34	36	39	143
2013	15	50	22	0	87
2014	6	0	13	18	37
2015	78	0	31	-28	81
2016	114	0	20	41	175
2017	99	0	74	4	177
2018	143	0	63	5	211
2019	139	0	41	36	216
2020	128	0	0	0	128
2021	23	26	0	17	66
Average	78	11	30	13	132

4.3.19 The table below (table 6) shows the windfall completions from the sources taken forward from step 3 between 51 and 100 dwellings. This shows that windfall completions on sites between 51-100 dwellings have been inconsistent on residential, office, and other land uses (coloured red), and have therefore been removed from the windfall assessment. However, windfall completions on sites between 51-100 dwellings on previous agriculture land shows consistent delivery (table 6, coloured green) and can therefore be used in the windfall supply.

Table 17: Windfall completions (51-100 dwellings) carried forward from Step 3, by previous land use

Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential	Total
2012	0	0	0	0	0
2013	0	0	6	0	6
2014	12	0	5	0	17
2015	18	0	22	0	40
2016	48	0	12	56	116
2017	52	0	42	0	94
2018	72	0	40	0	112
2019	78	0	20	0	98
2020	83	0	0	0	83
2021	29	0	0	0	29
Average	39	0	15	6	59.5

4.3.20 The table below (table 7) shows the windfall completions from the sources taken forward from step 3 between 101 and 250 dwellings. This shows that windfall completions on sites between 101-250 dwellings on all the previous land uses of agriculture, office, residential, and other have not been consistent between 2012-2021 and therefore have been removed from the assessment as they cannot be relied on as a consistent source of supply.

Table 18: Windfall completions (101-250 dwellings) carried forward from Step 3 by previous land use

Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential	Total
2012	0	0	0	0	0
2013	0	0	22	0	22
2014	0	0	4	0	4
2015	0	0	30	0	30
2016	0	0	23	0	23
2017	0	0	34	0	34
2018	0	0	0	0	0
2019	0	0	0	0	0
2020	0	0	0	0	0
2021	0	0	0	0	0
Average	0	0	11	0	11.3

4.3.21 The table below (table 8) shows the windfall completions from the sources taken forward from step 3 over 251 dwellings. This shows that all windfall completions on sites in excess of 251 dwellings have not been consistent between 2012-2021, therefore they have been removed from the assessment as they cannot be relied on as a consistent source of supply.

Table 19: Windfall completions (251+ dwellings) carried forward from Step 3, by previous land use

Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential	Total
2012	0	0	0	0	0
2013	0	0	0	0	0
2014	0	0	0	0	0
2015	0	0	0	0	0
2016	0	0	0	0	0
2017	0	0	0	0	0
2018	0	0	0	0	0
2019	0	0	0	0	0
2020	0	0	0	0	0
2021	0	0	0	0	0
Average	0	0	0	0	0

- i. Step 4 has analysed the consistency of windfall completions by previous land use and site size. The table below shows a summary of the windfall supply sources that will be carried forward from step 4 and those that will be removed from further analysis as part of step 5.

Table 20: Windfall completions total 2012-2021 – step 4 summary

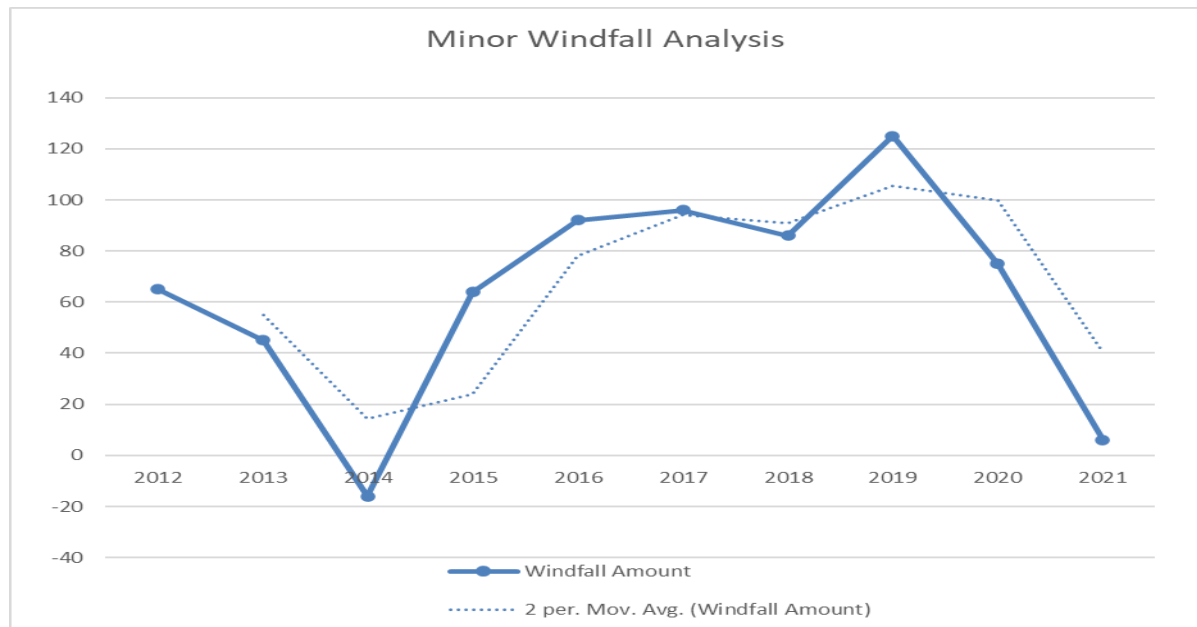
Year	Agricultural (Greenfield and Conversion)	Office	Other	Residential
0-9 dwellings	Carried forward	Carried forward	Carried forward	Carried forward
10-50 dwellings	Carried forward	Excluded	Carried forward	Carried forward
51-100 dwellings	Carried forward	Excluded	Excluded	Excluded
101-250 dwellings	Excluded	Excluded	Excluded	Excluded
251+ dwellings	Excluded	Excluded	Excluded	Excluded

v) Step 5 – Minor Windfall Analysis

- 4.3.22 Step 5 will further analyse those windfall completions categories that have been carried forward from step 4 by breaking them down into minor (9 dwellings or less) and major (10+ dwellings) sites.
- 4.3.23 The chart below shows the minor windfall completions from those sources carried forward from step 4. This is shown on a yearly basis (solid line, chart 1), as well as a two year rolling average (dashed line, chart 1).
- 4.3.24 This shows that minor windfall completions show fluctuations with both high and low outliers in years 2014, 2019, and 2021.

4.3.25 The chart also shows that the current two-year rolling average for windfall completions on minor sites is 40.5 dwellings per annum. This is low compared to the preceding years where completions were 125 dwellings (2019) and 75 dwellings (2020), due to the outlier of 6 windfall completions in 2021.

Chart 1: Minor Windfall Completions, carried forward from step 4, yearly and two-year rolling basis



4.3.26 Table 10 shows the windfall completions on those sites carried forward from step 4 on minor sites (9 dwellings or less). This shows that the average windfall completions between 2012-2021 from those carried forward in the assessment is 64 dwellings per annum on minor sites.

4.3.27 The table below also shows the average windfall completions on minor sites is 71 dwellings per annum when the two highest and two lowest outliers are removed.

Table 21: Minor Windfall Completions, (9 dwellings or less) carried forward from step 4

Year	Windfall Amount	Windfall Amount - remove outliers (2 highest and 2 lowest)
2012	65	65
2013	45	45
2014	-16	
2015	64	64
2016	92	92
2017	96	
2018	86	86
2019	125	

2020	75	75
2021	6	
Average	64	71

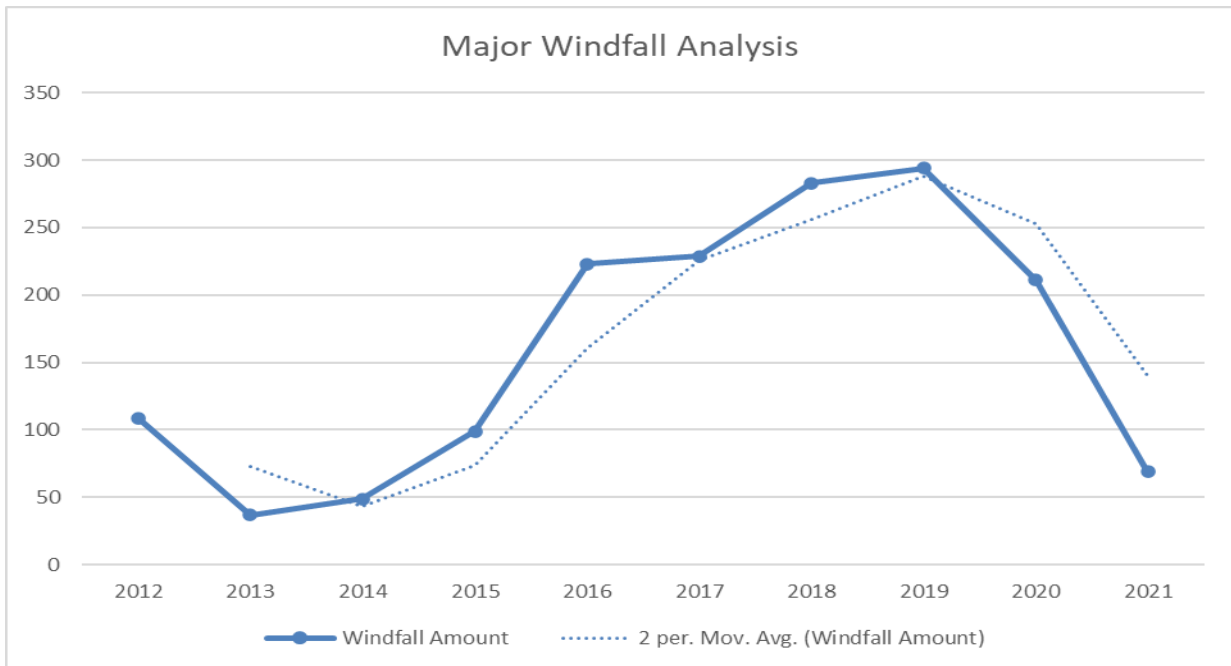
4.3.28 There are clear outliers in the windfall completions on minor sites which effect both the two-year rolling average of 40.5 dwellings and the total average of 64 dwellings. Therefore, the figure of 71 dwellings per annum that was calculated by removing the outliers and averaging the completions is the most robust figure to be used as the minor windfall allowance.

vi) Step 6 – Major Windfall Analysis

4.3.29 The chart below shows the major windfall completions from those sources carried forward from step 4. This is shown on a yearly basis (solid line, chart 2), as well as a two year rolling average (dashed line, chart 2).

4.3.30 This shows that major windfall completions show vary between 2012-2021. Between 2013 and 2014, windfall completions fell from 109 dwellings to 37 dwellings, then rising from 37 dwellings to 294 dwellings between 2013 and 2019, before dropping again to 211 and then 69 dwellings in 2020 and 2021 respectively. The current two-year rolling average for windfall completions on major windfall sites is 140, this falls comfortably within the range of completions between 2012-2021.

Chart 2: Major Windfall Completions, carried forward from step 4, yearly and two-year rolling basis



4.3.31 The table below shows the major windfall completions on those sites carried forward from step 4 on major sites (10 dwellings or more). This shows that average windfall completions between 2012-

2021 is 160 dwellings per annum. Table 11 also shows that when the outliers are removed (2 highest and 2 lowest) the average windfall completions on major sites is 157 dwellings per annum, this is only slightly affected as there are no major outliers.

Table 22: Major Windfall Completions, (10 or more dwellings) carried forward from step 4

Year	Windfall Amount	Windfall Amount - remove outliers (2 highest and 2 lowest)
2012	109	109
2013	37	
2014	49	
2015	99	99
2016	223	223
2017	229	229
2018	283	
2019	294	
2020	211	211
2021	69	69
Average	160	157

4.3.32 The above analysis provides three calculations for future major windfall allowance: 140 dwellings based on the two-year rolling average, 160 dwellings which is the total average, and 157 the average when the two highest and lowest outliers are removed.

4.3.33 Despite the limited impact of having an adopted local plan had on windfall completions between 2015 and 2020, we still anticipate that by years 4 and 5 the local plan will be adopted and a higher amount of developments will be on allocations. Therefore, we recommend that a windfall allowance of 140 dwellings per annum.

4.4 Windfall Conclusions and Recommendations

4.4.1 This report has undertaken an analysis of windfall completions in Chichester District in accordance with national policy and guidance.

4.4.2 We recommend that Chichester District includes a windfall allowance as part of the five year housing land supply from year four of the assessment, as most windfall developments that will be built in years 1-3 already have permission and are specifically accounted for in the land supply assessment.

4.4.3 Both a minor (9 dwellings or less) and a major (10 dwellings or more) windfall allowance should be made. Specific recommendations for these are set out below:

vii) Minor Windfall

- 4.4.4 We recommend that the existing minor windfall allowance which accounts for sites of five dwellings or less is removed and replaced with a minor windfall allowance for sites of 9 dwellings. This will align with the NPPF definition of major/minor sites.
- 4.4.5 The minor windfall allowance currently accounted for across years 1 to 5 should be removed. In years 1-3 the specific permissions should be included and for years 4 and 5 a minor windfall allowance should be included.
- 4.4.6 Considering the analysis conducted above, a minor windfall allowance of 71 dwellings per annum should be used. This is based on removing any inconsistent sources of supply by analysing both the previous use of land as well as the site size.

viii) Major Windfall

- 4.4.7 We recommend that 140 dwellings per annum is used as the major windfall allowance as this figure takes into account the expectation that an adopted local plan could reduce windfall completions.
- 4.4.8 The windfall allowance should be included in years 4 and 5, as this would, in practice, avoid double counting the large applications received in or prior to year 1 of the assessment and are likely to be built out in years 1 to 3.