



Strategic Housing Land Availability Assessment: Phase 3 – Windfall



Update 2014

Final Version

November 2014

Contents

1. Introduction	3
2. Methodology and basis for further analysis	4
3. Results of analysis	7
4. Summary and conclusion	14
Appendix 1: Full summary of C1/C3 windfall completions by year	15
Appendix 2: Full summary of C2 windfall completions by year	17

Colin Haigh
Head of Planning
Welwyn Hatfield Borough Council
Council Offices
The Campus
Welwyn Garden City
Hertfordshire
AL8 6AE

Tel: 01707 357000

Fax: 01707 357285

planningpolicy@welhat.gov.uk

1 Introduction

- 1.1 Phases 1 and 2 of the Strategic Housing Land Availability Assessment (SHLAA) identify and assess the suitability, availability, achievability and capacity of potential sites for housing in Welwyn Hatfield, respectively within and outside the borough's urban areas. This approach is in line with the National Planning Policy Framework (NPPF), which sets a clear expectation that the supply of land for housing should be based on specific sites. However, paragraph 48 of the NPPF allows local planning authorities to also make an allowance for sites in their five-year housing land supply which may come forward for development unexpectedly, without previously having been promoted to the Council or identified as having development potential. These sites are referred to as 'windfall' sites.
- 1.2 In a similar vein, Planning Practice Guidance issued by the Department of Communities and Local Government also allows local planning authorities to identify broad locations for development, which could include a windfall allowance throughout the whole of the plan period based on a geographical assessment.
- 1.3 However, in order to include a windfall estimate in their housing supplies, local planning authorities must have 'compelling evidence' that such sites have consistently become available in the local area in the past, and will continue to provide a reliable source of supply. The purpose of the SHLAA Phase 3 study is to provide that evidence.
- 1.4 The Council published its initial SHLAA Phase 3 study in October 2012 as part of the process of preparing a Local Development Framework, which was to contain a number of documents intended to shape future development in the borough. The Council is now preparing a single Local Plan instead, and will consult on development sites and the overall capacity for new dwellings within the borough as part of its preparation.
- 1.5 Given the significant number of changes to the planning system introduced by the Government over the past two years, as well as to allow more up to date evidence to be incorporated, an update on the borough's windfall capacity is needed. This update to the Phase 3 SHLAA (SHLAA 3) fulfils that purpose.
- 1.6 The following section provides a summary of the SHLAA 3 methodology and the changes to the planning system over the past two years. This provides the basis for revisiting the previous 2012 SHLAA 3 assumptions. Section 3 then sets out and explains the revised windfall assumptions, and Section 4 concludes on an overall windfall figure for the new Local Plan.

2 Methodology and basis for further analysis

- 2.1 The publication of the NPPF in March 2012 provided local planning authorities with greater flexibility for including an allowance for windfall than its predecessor Planning Policy Statement (PPS) 3: Housing. PPS3 – now cancelled – stated that an allowance for windfalls should not be included in the first 10 years of land supply. A change in national policy and practice guidance means it is now acceptable to allow for windfall throughout most of the plan period, as long as there is evidence that there is a realistic likelihood of windfall development coming forward.
- 2.2 This SHLAA 3 Update uses a similar approach for C3 residential development (including C1 student halls of residence) as the original 2012 document. It assesses the amount of development likely to arise in the future from windfall sites by looking at historic delivery across a number of different previous land uses, and considers whether or not historic trends are likely to continue. However, in accordance with the national [Planning Practice Guidance](#) (PPG) issued in March 2014 this SHLAA 3 report also now includes further analysis on the geographical location of windfall; breaking completions down between towns, villages, and the green belt.
- 2.3 Table 1 on p4 of the 2012 SHLAA 3 document set out the broad land uses into which all housing completions were grouped – this has now been rationalised slightly:
- Agriculture and other rural land uses
 - Business, with sub-groups for: i) Offices; ii) Manufacturing; iii) High technology businesses and iv) Warehousing and depots
 - Community services, with sub-groups for: i) Hospitals; ii) Day centres; iii) Dental or health centres; iv) Places of worship; and v) Emergency services
 - Education
 - Leisure, with sub-groups for: i) Community halls; ii) Entertainment or sport; iii) County and golf clubs; iv) Theatres and museums; v) Public houses; vi) Studios and workshops; vii) Playing fields; viii) Footpaths and cycleways; and ix) Allotments
 - Parking and garages
 - Residential, with sub-groups for: i) Garden land¹; ii) Non-garden land; and iii) Residential institutions
 - Retail, with sub-groups for: i) General retail and ii) Motor trades
 - Utilities
 - Vacant land

¹ The NPPF prevents garden land from being included in windfall allowances. Windfall has however been consistently delivered on garden land in Welwyn Hatfield, so is included for completeness.

- 2.4 The period used to assess past windfall is the 13 monitoring years from 2001/02 to 2013/14. This is 2 additional years of data compared to the 2012 SHLAA 3, allowing slightly more reliable historic averages to be calculated and more broadly allowing a better understanding of historical trends. As before, all of a site's completions have been counted in the year in which the entire site was completed.
- 2.5 The means of identifying whether or not historic completions were windfall simply involves taking all completions, and subtracting those that were on sites allocated by the 2005 District Plan; sites initially identified in the 1999 Urban Capacity Study; and sites initially identified in the 2009 SHLAA 1. Whilst the 2012 SHLAA 2 and 2013 SHLAA 1 Review have both been published since the previous 2012 SHLAA 3, at the time of preparing this document none of the sites initially identified in them have been fully completed. Sites which already had planning permission at the time of producing the 2013 SHLAA 1 Review, but were included in it for completeness, have been counted as windfall as it was not the SHLAA 1 Review which first identified them.
- 2.6 Decisions about the windfall allowance for each land use category are based on professional judgement, informed by the following considerations:
- Historic trends on the number and proportion of total completions which were on windfall sites;
 - Local knowledge about the availability of particular land uses in the future;
 - Existing and emerging policy that will affect the availability of some land uses.
- 2.7 The broad historic trends and local knowledge used in preparing the SHLAA 3 remain relatively similar to those seen two years ago. However, a shift in national policy aimed at stimulating the housing market has affected, and will continue to affect, the availability of certain land uses for housing development and windfall.
- 2.8 Particularly striking is that permitted development rights have now been amended so as to allow, without the need to first obtain planning permission, certain changes of use of buildings. This includes (subject to a prior notification/approval process) the change of use from offices, shops and agricultural buildings to residential use. As such changes are often contrary to local planning policy (e.g. allocated employment areas are generally protected for employment related uses), sites like these that are now being considered by developers for residential uses will generally not have been promoted previously through the SHLAA. Such changes of use are therefore particularly likely to produce a windfall housing supply in the future.

- 2.9 The new PPG also now allows the inclusion of dedicated student housing (Use Class C1) and housing provided for older people, including residential care homes (Use Class C2), towards a local authority's housing requirements.
- 2.10 The PPG states that student housing should be included '*based on the amount of accommodation it releases in the housing market*'. Within Welwyn Hatfield there have been particular issues historically with the demand for and supply of student housing. As a benchmark for estimating the number of homes that may return to the general housing market as a result of an expected increased supply of purpose built student accommodation, the council has reviewed the trends seen through the conversion of large numbers of 'conventional' dwellings to HMOs (houses in multiple occupation) for student use. The council's monitoring indicates that the average number of bedrooms in each HMO that has been the subject of an application to the Council is 4.5 bedrooms, which the Council has rounded to a more cautious 5:1 ratio between new student bedrooms and 'dwelling equivalents' in the housing supply. Historic windfall C1 completions are therefore included in the windfall analysis on this basis.
- 2.11 For elderly persons housing, the PPG is less clear on a means of assessment and simply states that '*local planning authorities should count housing provided for older people...against their housing requirement*'. The council's Strategic Housing Market Assessment 2014 has identified a need for additional bed-spaces in care accommodation for those aged over 75, separate to the borough's main housing need assessment. The Local Plan is therefore likely to identify separate targets for C3 and C2 housing, and the windfall potential for each has therefore been assessed separately. A further allowance for the return of C3 dwellings to the market arising from the construction of new C2 bedrooms will also be made, similar to the allowance for student housing set out in 2.10 above. However, because the Local Plan's C2 target is likely to be separate this is not a component of the C2 windfall calculation, and is covered in the separate SHLAA Phase 1 Update.
- 2.12 As noted on page 4, the broad approach for C3 housing is to project forward likely future windfall based on historic windfall delivery across a number of previous land uses. This would be much more challenging for C2 housing, as there have been far fewer C2 completions since 2001 from which to establish any reliable trends. The approach taken for Use Class C2 has therefore been to assess the historic windfall provision across all previous land uses together.
- 2.13 The full assessment of the future potential for windfall based on the above methodology is set out over the following pages.

3 Results of analysis

Conventional housing and student housing (Use Class C3 and C1)

- 3.1 Between 1 April 2001 and 31 March 2014, sites with 5,680 C3 dwellings and C1 dwelling equivalents were completed in Welwyn Hatfield. This is an increase from 4,723 at the time the 2012 SHLAA 3 was produced.
- 3.2 Of these 5,680 completions, 4,584 were on sites that were either allocated for housing or otherwise identified as suitable for housing by the Council. The remaining 1,096 completions were therefore windfall – 19.3% of total completions, and an average of 84.8 windfall completions per year. By comparison, at the time of the 2012 SHLAA 3 there had been 972 completions on windfall sites – 20.6% of total completions, and an average of 88.4 windfall completions per year. Rather than indicating a reduction in overall windfall delivery, this is primarily the result of the average figure including two more years of more ‘typical’ windfall delivery (the 352 windfall completions in 2008/09 alone skew the average significantly upwards).
- 3.3 Appendix 1 on page 15 summarises annual housing completions against their previous land use, broken down between total completions and windfall. Although the redevelopment of former high technology land uses resulted in the most housing completions overall (2,120, nearly 40% of the total), only 1.8% of these were windfall. Indeed, relatively few of the former land uses set out in this report contributed meaningful numbers of windfall completions. The historical trend and potential future windfall contribution of each former land use is explored below.

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Agricultural and other rural uses</i>	2.8 per annum	2 per annum	4 per annum
Comment on future trend	This land use has consistently delivered a small amount of windfall. The 2012 SHLAA 3 projected forward 2 dwellings per annum, but since then the government has introduced permitted development rights allowing the conversion of agricultural buildings to dwellings without planning permission. The potential impact of this is unknown and likely to be minor, but is nevertheless likely to increase the total windfall delivery. The NPPF has also placed a new emphasis on suitable redevelopment of previously developed sites in the green belt, and the Council has now approved a number of such schemes. A slightly increased windfall projection of 4 dwellings per annum can therefore now be made for this land use.		
Geographical location of projected windfall	All of the historic windfall from this land use has been in the green belt. Given this, and the clearly rural nature of agricultural land uses, it is expected that all of the 4 projected windfall dwellings per annum will be spread throughout the green belt.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Business – Offices</i>	8.0 per annum	2 per annum	8 per annum
Comment on future trend	Office conversions have consistently delivered a relatively large amount of windfall. Recently introduced permitted development rights mean that such conversions also no longer require planning permission, potentially providing a dramatic boost to future windfall, although these changes have not yet been made permanent. Nevertheless, the number of conversions already approved is a clear indication of market demand, and shows a high likelihood of at least continuing the historic trends. An increased windfall projection of 8 dwellings per annum can therefore now be made.		
Geographical location of projected windfall	The majority of historic windfall from this land use has been within the towns of Welwyn Garden City and Hatfield, although a small amount has been in the borough's villages (none has been in the green belt). It is therefore not possible to project a precise geographical location for future windfall from former office uses, although it is considered likely that the majority will continue to be in towns.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Business – Manufacturing</i>	1.5 per annum	None	None
Comment on future trend	Relatively little windfall has been generated historically, with 3 windfall completions over 13 years. This is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Business – High technology</i>	3.0 per annum	None	None
Comment on future trend	Whilst the overall average windfall figure has historically been reasonable, it is primarily the result of a single large windfall completion in 2005/06. It is therefore not considered to be sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Business – Manufacturing/Depot</i>	2.3 per annum	None	2 per annum
Comment on future trend	Many manufacturing/depot uses are located in designated Employment Areas, where changes of use to housing would be contrary to policy. Some other manufacturing/depot sites located outside Employment Areas have also been actively identified in the Phase 1 (Urban) SHLAA. However, a small amount of windfall has consistently been delivered on small sites outside Employment Areas, including a windfall completion in 2013/14 in a village location. A small windfall projection of 2 dwellings per annum is therefore considered reasonable.		
Geographical location of projected windfall	Because most manufacturing and depot uses in Welwyn Garden City and Hatfield are in designated Employment Areas, it is very unlikely that windfall would be delivered in the towns from this use in the future. Historic manufacturing/depot windfall completions have taken place both in the borough's villages and the green belt. This is considered likely to continue, and it is therefore not possible to project a precise geographical location for future windfall.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Community service – Hospital</i>	0.9 per annum	None	None
Comment on future trend	Very little windfall has been generated historically, with 2 windfall completions over 13 years. This is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Community service – Day centre</i>	None	None	None
Comment on future trend	This land use has never delivered windfall, and there is therefore no basis on which to make a windfall projection for it.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Community service – Dental/Health centre</i>	0.3 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, the small amount of development overall means it is not sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Community service – Place of worship</i>	0.4 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, the small amount of development overall means it is not sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Community service – Emergency services station</i>	None	None	None
Comment on future trend	This land use has never delivered windfall, and there is therefore no basis on which to make a windfall projection for it.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Education</i>	3.9 per annum	None	2 per annum
Comment on future trend	Education land uses have contributed a relatively large amount of historic windfall. Although Hertfordshire County Council (as local education authority) is generally proactive at promoting its own sites for development, several of the borough's schools have converted to academy status in recent years, meaning they now have more control over their sites. There are clearly also other private educational sites in the borough (indeed these make up much of the historic windfall). Accordingly, a small windfall allowance is now considered to be justified.		
Geographical location of projected windfall	The majority of the historic windfall from this land use has been in the green belt, with a small amount in Welwyn Garden City and Hatfield and none in the villages. This is considered to be circumstantial, and given the broad spread of educational land uses throughout the borough it is therefore not possible to project a precise geographical location for future windfall from an educational use.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Community hall</i>	0.2 per annum	None	None
Comment on future trend	Very little windfall has been generated historically, with only one windfall site with two dwellings. This is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Entertainment/sport</i>	2.0 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, as this has only been across 2 sites it is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Golf or country club</i>	6.0 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, despite a large amount of windfall in total, this has only been across 3 sites (and was almost all completed in one year) and is therefore not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Theatre/Museum</i>	0.2 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, as this has only been on 1 site it is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Studio/Workshop</i>	None	None	None
Comment on future trend	This land use has never delivered windfall and therefore cannot be projected forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Public house</i>	3.2 per annum	2 per annum*	2 per annum
Comment on future trend	<p>The redevelopment of public houses has made a small but consistent windfall contribution historically. As in 2012 it is considered that public houses are likely to continue to come forward as windfall sites, and a small windfall allowance of 2 dwellings per annum has therefore been made.</p> <p><i>*The projection of 2 windfall dwellings per annum in the 2012 SHLAA was across all leisure uses, which together had 14.1 windfall dwellings completions per annum. However, the windfall contribution of public houses is easiest to trend.</i></p>		
Geographical location of projected windfall	The majority of the historic windfall from this land use has been in Welwyn Garden City and Hatfield, with smaller amounts in the villages and the green belt. Although public houses are well spread throughout the borough, this difference is partly the result of higher density redevelopments being accepted in policy terms in towns, but less so in villages and the green belt. This will remain the case, and it is therefore expected that the majority of the average 2 windfall dwellings per annum projected on former public house sites will be in Welwyn Garden City and Hatfield.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Playing fields</i>	None	None	None
Comment on future trend	This land use has never delivered windfall, and there is therefore no basis on which to make a windfall projection for it.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Footpath/Cycleway</i>	2.8 per annum	None	None
Comment on future trend	All development from this land use has been windfall. However, as this has only been on 1 site it is not considered sufficiently compelling to project forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Leisure – Allotments</i>	None	None	None
Comment on future trend	This land use has never delivered windfall, and there is therefore no basis on which to make a windfall projection for it.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Parking and garages</i>	1.6 per annum	None	None
Comment on future trend	Parking and garage land has contributed a small but steady amount of windfall historically. However, this is unlikely to continue as most such sites are Council-owned, and the Council now actively identifies sites with development potential as part of its Affordable Housing Programme.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Residential – Garden land</i>	6.7 per annum	None	None
Comment on future trend	Residential garden land has historically been the fourth largest source of windfall housing, and the Council continues to consistently approve developments on residential garden land where they are judged to be appropriate. However, the National Planning Policy Framework specifically states (para 48) that garden land should not be included in windfall allowances. In common with the 2012 SHLAA 3 assessment, no windfall allowance has been made.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Residential – Non-garden land</i>	16.0 per annum	13.3 per annum	16 per annum
Comment on future trend	The redevelopment and sub-division of existing residential buildings makes up by far the largest source of windfall in the borough. Such developments tend to be small-scale but come in large numbers – generally at least 5-10 individual sites each year, making them very difficult to anticipate and plan for. As the rate of past delivery has been steady and consistent it is considered reliable to trend forward at the same rate – the windfall projection is therefore 16 dwellings per annum.		
Geographical location of projected windfall	Historic windfall from this land use has largely been spread between the borough's towns and villages, with a small amount in the green belt as well. It is therefore not possible to project a precise geographical location for future windfall from existing residential uses, and it is expected to continue to be widely spread.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Residential institutions</i>	14.2 per annum	None	None
Comment on future trend	All historical development from this land use has been windfall, with a sizable annual amount of windfall on average. This has however only been across 3 sites, one of which was the largest single windfall completion by some margin (164 dwellings in 2008/09). It is therefore not considered reasonable to trend forward.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Retail – General</i>	3.8 per annum	None	4 per annum
Comment on future trend	General retail land uses have delivered a reasonable amount of windfall historically. The 2012 SHLAA 3 did not make an allowance for windfall from any retail uses, but recent changes to permitted development rights by government have necessitated that this be reviewed. Planning permission is now not required to change the use of small shops to a residential use, as well as first floor spaces above shops. It is not yet known what impact this will have on long term delivery, but such small scale developments are unlikely to be promoted to the council through the plan making process. It is therefore considered reasonable to carry the historical trend delivery rate forward with a slight uplift, to 4 windfall dwellings per annum to take account of the new permitted development rights and further signals from government around their use.		
Geographical location of projected windfall	All of the historic windfall resulting from a former retail land use has been within Welwyn Garden City and Hatfield. This is considered likely to continue in the future, although not all of the projected 4 windfall dwellings per annum from this land use can reliably be projected to be within the towns – given the borough’s number of village centres, a small part of the projection could be within the villages. However, none of the future windfall from a former retail land use is expected to be within the green belt.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Retail – Motor trade</i>	1.6 per annum	None	None
Comment on future trend	Although motor trade sites have delivered a reasonable amount of windfall on average, none of these windfall completions have been since 2005/06. A number of motor trade sites have been identified in the Phase 1 (Urban) SHLAA, and so no windfall allowance has been made.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Utilities</i>	0.1 per annum	None	None
Comment on future trend	Only 1 dwelling has been completed on former utilities land between 2001/02 and 2013/14. Although this was windfall, it is not sufficiently compelling to establish a trend.		

Previous Land Use	2001/02 to 2013/14 Average Windfall	2012 SHLAA 3 Projected Windfall	2014 SHLAA 3 Projected Windfall
<i>Vacant land</i>	3.3 per annum	None	None
Comment on future trend	Vacant land has achieved a reasonable average historic windfall delivery rate. However, this is skewed by a large completion in 2002/03, which pre-dates the SHLAA, where vacant land is now almost certain to be identified.		

- 3.4 A windfall projection has been made for 7 of the 28 previous land uses:
- Agricultural and other rural land uses
 - Business – Offices
 - Business – Manufacturing/Depot
 - Education
 - Leisure – Public House
 - Residential – Non-garden land
 - Retail – General
- 3.5 The projected annual windfall across these 7 previous land use types is **38 dwellings per annum**. This compares with a projection for 19.3 dwellings per annum made when the Phase 3 SHLAA was first produced in 2012.

Elderly Persons Housing (Use Class C2)

- 3.6 As noted at 2.11, the windfall potential of accommodation for the elderly in Use Class C2, such as care homes, must be calculated separately. Because of the smaller number of historic C2 completions it is not possible to assess future windfall potential by looking at sites' previous uses – it has been done by looking at all C2 completions across all land uses together.
- 3.7 Between 2001/02 and 2013/14, sites with 362 C2 bedrooms were completed in Welwyn Hatfield. This included 120 bedrooms which came forward as windfall – an overall windfall proportion of 33.1%, and equal to 9.2 bedrooms per annum overall over the 13 years. Appendix 2 on page 17 summarises the annual completions against their previous land use, broken down between total completions and windfall.
- 3.8 The proportion of C2s that have been windfall is somewhat higher than the 19.3% proportion of windfall for C3s – as C2s have not previously counted towards housing supplies, they have not historically been identified as standalone sites in the SHLAA. The C2 completions which were not windfall were smaller parts of larger sites allocated in the 2005 District Plan.
- 3.9 The 2012 SHLAA 3 made no future windfall projection for C2s, as at that time the need for C2s was not identified separately and national policy made no provision to include them in the housing supply. However, following the government's publication of the new PPG, the SHLAA can now identify sites for care homes (or other similar specialist housing uses with care). Because of this, and because new care homes typically need to be of a certain size to be viable, the likelihood of C2 bedrooms now arising as windfall is reduced. However, there have however always been a number of smaller C2 schemes as well as extensions to existing facilities coming forward as windfall, something considered likely to continue. A small future windfall allowance of **5 C2 bedrooms per annum** has therefore been made.

4. Summary and conclusion

- 4.1 The analysis in this report has established future windfall projections for Welwyn Hatfield of 38 dwellings per annum (including student housing dwelling equivalents), in addition to 5 C2 bedrooms per annum. The local knowledge of development circumstances and application of local and national policy used in arriving at the windfall projections, in combination with the analysis of historic windfall delivery rates in the borough, is considered to constitute robust evidence to support these figures.
- 4.2 This report's windfall projection of 38 dwellings per annum is higher than the 19.3 dwellings per annum figure reached by the 2012 SHLAA 3 report. As explored throughout Chapter 3, this is partly the result of the various government changes to permitted development regulations which have been introduced since 2012, and are expected to lead to increased windfall delivery. In light of two further years of historic windfall evidence, the 2012 SHLAA 3's windfall projections have also been considered unduly pessimistic.
- 4.3 Notwithstanding the above, the new windfall projections remain cautious, being less than half the average 84.8 dwellings per annum historic windfall delivery rate in the borough. Indeed, the windfall delivery rate has only been less than 38 dwellings in 3 of the last 13 years, and 1 of the last 5 years. Whilst every effort has and will be continue to be made to identify sites through the Phase 1 and 2 SHLAA process, it is acknowledged that the windfall delivery rate over the life of the new Local Plan may well be more than 38 dwellings per annum. However, the 38 dwellings per annum figure, in addition to the 5 C2 bedrooms figure, is considered to be the best projection that can be made based on a clear record of evidence of past delivery.
- 4.4 These windfall projections will form a small but important component of the borough's future housing supply in the new Local Plan. Given that windfall by its nature is unexpected, none can be projected within a three year period from the point at which a trajectory is calculated (three years being the shortest amount of time in which a site could realistically 'emerge', be granted planning permission, and be completed). Given the timing of the preparation of the borough's new Local Plan, no windfall projection would be made until 2017/18. For the 14 years from then until the end of the plan period (2030/31), the C3 (and C1 student accommodation) windfall projection is **532 dwellings** (14 x 38 dwellings per year). For C2 elderly person's accommodation, the overall windfall projection is **70 C2 bedrooms** (14 x 5 bed-spaces per year).

**Appendix 1 –
Full summary of
C1/C3 completions
by year**

Previous use	Settlement type	Completions by year, by settlement type																				Totals, by settlement type				Overall totals, by land use				2012 SHLAA 3 Projections	2014 SHLAA 3 Projections															
		2001/02		2002/03		2003/04		2004/05		2005/06		2006/07		2007/08		2008/09		2009/10		2010/11		2011/12		2012/13		2013/14		TOTALS				Annual windfall		% windfall												
		T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W			T	W	T	W											
Agriculture and other Rural uses	Towns Villages Green belt	2	2			3	3	12	12	6	6	2	2	1	1	2	2	1	1	3	3	1	1	3	3			36	36	2.8	100.0%	36	36	2.8	100.0%	2	4									
	Villages Green belt							17	17	6	6	5	5	20	20	47	23			3	3	1	1	17	10	14	14	123	92	7.1	74.8%	135	104	8.0	77.0%	2	8									
Business	Office	1	1																	4	4	1	1					12	12	0.9	100.0%															
	Manufacturing							174		86	7					8	8							24	4			284	19	1.5	100.0%	303	19	1.5	6.3%											
	High technology																							164		209		2082	1	0.1	0.0%	2120	39	3.0	1.8%											
	Manufacturing/ Depot																											38	38	2.9	100.0%															
	Green belt	3	3	6		93		99	2	2																		112	19	1.5	17.0%	418	30	2.3	7.2%		2									
Community services	Hospital	2	2																									69	12	12	0.9	100.0%	81	12	0.9	14.8%										
	Day centre																																	23	23											
	Dental or health centre																																	1	1	0.1	100.0%	4	4	0.3	100.0%					
	Place of worship	2	2																															3	3	0.2	100.0%	5	5	0.4	100.0%					
	Emergency services																																	11	11	0.8	100.0%	14	14							
	Green belt																																	69	12	0.9	100.0%	14	14							
Education	Towns Villages Green belt							333																									89	10	10	0.8	1.1%	921	50	3.9	5.4%		2			
	Green belt																																	2	2	0.2	100.0%	20	2	0.2	10.0%					
Leisure	Community hall																																18				20	2	0.2	10.0%						
	Entertainment or sport																																23	23	1.8	100.0%	25	25	2.0	100.0%						
	Country or golf club																																48	48	3.7	100.0%	78	78	6.0	100.0%						
	Theatre or museum																																84				87	3	0.2	3.4%						
	Public house	3	3																														24	24			48	35	2.7	72.9%	66	41	3.2	62.1%	2	2
	Studio or workshop	2	2			12																											3	3	0.2	100.0%	27	27								
	Green belt																																1	1	0.1	100.0%	1	1	0.1	100.0%						
	Playing field																																65				153				153	Nil	Nil	N/A		
	Footpath or cycleway																																37	37	2.8	100.0%	37	37	2.8	100.0%						
	Allotments																																24				24	24			24	Nil	Nil	N/A		
Parking and garages	Towns Villages Green belt																															15	8	8		46	16	1.2	34.8%	51	21	1.6	41.2%			
	Green belt																																5	5	0.4	100.0%	5	5	0.4	100.0%						
Residential	Garden	6	6	5	5	6	6	3	3	5	5	2	2	5	5	5	3	4	2	1	1	4	4	1	1	1	1	37	33	2.5	89.2%	52	52	4.0	100.0%	91	87	6.7	95.6%							
	Non-garden	1	1	12	6	13	13	2	3	23	23	2	2	21	21	31	19	2	2	9	9	5	5	6	6	6	6	113	87	6.7	77.0%	115	105	8.1	91.3%	243	207	16.0	85.2%	13.3	16					
	Green belt	10	10	6	6			3	3	16	16	11	11	18	8	7	7	15	15	5	5	1	1	1	1	9	9	15	15	1.2	100.0%	15	15	1.2	100.0%											
Residential institution																																	19	19			184	184	14.2	100.0%	184	184	14.2	100.0%		
Retail	General																																12	12			49	49	3.8	100.0%	49	49	3.8	100.0%		4
	Motor trade	14	14																														2	2	0.2	100.0%	65	14	1.1	21.5%	71	20	1.6	28.2%		
Utilities	Towns Villages Green belt																															1	1	0.1	100.0%	1	1	0.1	100.0%							
Vacant land	Towns Villages Green belt																															36	36			407	36	2.8	8.8%	413	42	3.3	10.2%			
																																1	1	0.2	100.0%	2	2	0.2	100.0%							
																																4	4	0.3	100.0%	4	4	0.3	100.0%							
Total comps		47	77	569	1266	316	824	916	751	50	152	104	277	331	5680																															
Total windfall		47	59	39	79	142	27	90	352	30	39	66	42	84	1096																															
% windfall		100.0%	76.6%	6.9%	6.2%	44.9%	3.3%	9.8%	46.9%	60.0%	25.7%	63.5%	15.2%	25.4%	19.3%																															

In the columns for Completions by year, by settlement type:

T is total number of completions
W is the number of completions which were windfall

Page intentionally left blank

Appendix 2 – Full summary of C2 completions by year

Settlement type	Completions by year (C2 bedrooms), by settlement type														Totals		Average annual windfall	2012 SHLAA 3 projection	2014 SHLAA 3 projection												
	2001/02		2002/03		2003/04		2004/05		2005/06		2006/07		2007/08		2008/09					2009/10		2010/11		2011/12		2012/13		2013/14		Totals	
	T	W	T	W	T	W	T	W	T	W	T	W	T	W	T	W				T	W	T	W	T	W	T	W	T	W	T	W
Towns	29	29											13	13	118				13	13			65		59		297	55			
Villages																							50	50			50	50			
Green belt																	15	15									15	15			
Previous land uses	Residential institution (22)												Residential garden land (13)		High technology (118)		Residential institution (15)		Education (10)				Emergency services (65) Manufacturing/Depot (50)		Emergency services (59)						
Total comps	29		0		0		0		0		0		13		118		15		13		0		115		59		362				
Total windfall		29		0		0		0		0		0		13		0		15		13		0		50		0		120			
% windfall	100.0%		N/A		N/A		N/A		N/A		N/A		100.0%		0.0%		100.0%		100.0%		N/A		43.5%		0.0%		33.1%				

In the columns for Completions by year, by settlement type:

T is total number of completions

W is the number of completions which were windfall

**WELWYN
HATFIELD**
BOROUGH COUNCIL

