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Abbreviations

AMR	Annual Monitoring Report
JUDP	Joint Unitary Development Plan for Pembrokeshire 2000-2016
LDP / LDP (2)	Local Development Plan / Local Development Plan (2)
LPA	Local Planning Authority
SPG	Supplementary Planning Guidance
TAN	Technical Advice Note
LHMA	Local Housing Market Assessment
PCNPA	Pembrokeshire Coast National Park Authority
PCC	Pembrokeshire County Council
WG	Welsh Government

Glossary of Terms

Adopted	The Local Development Plan is adopted when the Authority's Council Meeting decides it will be the Development Plan for the County and replace the existing Development Plan.
Affordable Housing	Residential development for sale or rent below market prices and retained as affordable in perpetuity
Affordable Housing Allocation	Land allocated for affordable housing either low cost home ownership or to rent.
Availability and Deliverability of Land	Available land includes a landowner willing to develop or sell for development. Deliverability relates to the economic viability of bringing a site forward
Countryside	Land outside of settlements identified within the Settlement Hierarchy
Deposit Plan	A full draft of the Plan which is available for public consultation during the Deposit Period.
Housing Allocation	Residential development sites for a minimum of 5 units and shown within the Development Plan
Infrastructure	Infrastructure encompasses power supplies, water supply, means of sewage or surface water disposal, roads and other transportation networks, telecommunications and facilities that are required as a framework for development.
Joint Unitary Development Plan (JUDP)	The previous Development Plan for Pembrokeshire. The Plan that was in place until 2013 when the Local Development Plan was adopted.
Market Housing	Housing for sale at market prices (can include self-build or custom build housing).
Settlement Hierarchy	Settlements are classified within the hierarchy according to the population and level of services within the settlement.

	Some very small settlements with very limited or no services will fall outside the hierarchy and are defined as countryside.
Windfall	Windfall sites are sites not included as allocations within a Development Plan, but which subsequently become available for housing development. They are sites not formally identified in the development plan. Whilst windfalls are not planned, they are an expected type of development which contribute towards an Authority's overall housing provision.

Introduction

Local Development Plan Review

- i. Pembrokeshire County Council is preparing a replacement Local Development Plan (LDP) – **Local Development Plan 2**. When adopted, it will provide a revised and updated policy framework to guide development outside of the National Park and inform planning decisions taken by the County Council. During the **Review**, the existing Local Development Plan (up to 2021) will remain in place until Local Development Plan 2 (LDP2) is adopted.

Housing: Calculation of Windfall Allowance

- ii. This Background Paper Housing: Calculation of Windfall Allowance has been produced to explain how the Authority has identified its windfall figure for use within the Deposit Plan housing supply calculations.
- iii. There is no formal definition of a windfall site, however it is generally taken to be a site which is not allocated within a development plan, but which subsequently comes forward for development.
- iv. This paper looks at information from monitoring for Pembrokeshire County Council and assesses the historic trends that have taken place between 2014 and 2018 in order to identify a reasonable figure that can be assumed for windfall housing development over the period of LDP 2 (2017-2033). The period of 2014-2018 has been chosen for analysis because this period covers the post adoption period of the current Local Development Plan and is therefore more likely to be representative of future trends, in comparison with longer historic periods based on a significantly different planning policy position.

National Planning Policy

What is windfall?

- v. Windfall sites are sites not included as allocations within a Development Plan, but which subsequently become available for housing development. They are sites not formally identified in the development plan. Whilst windfalls are not planned, they are an expected type of development that contribute towards an Authority's overall housing provision. Planning Policy Wales (Edition 10) notes that: 'Infill and windfall sites can make a useful contribution to the delivery of housing'.¹
- vi. Windfall sites can come forward on both small (four or less units) and large (five or more units) sites. These developments include infill sites within a village or town within the settlement boundaries (not on allocated sites) and also includes individual, sometimes isolated dwelling units that have been

¹ Paragraph 4.2.23

given planning permission such as barn conversions or to meet a specific local need such as for a rural enterprise workers dwelling.

Requirements for preparing a Local Development Plan

- vii. Draft Local Development Manual Edition 3 notes that when identifying its Housing Land Supply, Authorities should include an assessment of each component (including large windfall sites and small windfall sites) and that these must be 'numerically attributed to each tier of the settlement hierarchy'.²

Extract from Table 18 of Draft LDP Manual Edition 3:

Analysis of past trends- *The evidence should set out small and large sites windfall rates as separate components. It will be for the LPA to determine the threshold (5 or 10 units).*

Reviewing windfall delivery rates for both small and large sites, over different time periods, will shape the consideration of a future extrapolation rate. Contextual commentary on those rates in relation to the plan may be helpful. Periods of abnormally high or low completion rates are inappropriate to include in a future extrapolation rate. The evidence should be clear as to what period has been chosen and the rationale for doing so. The time period chosen should be sufficient to rule out anomalies in specific years and be of a reasonable duration.

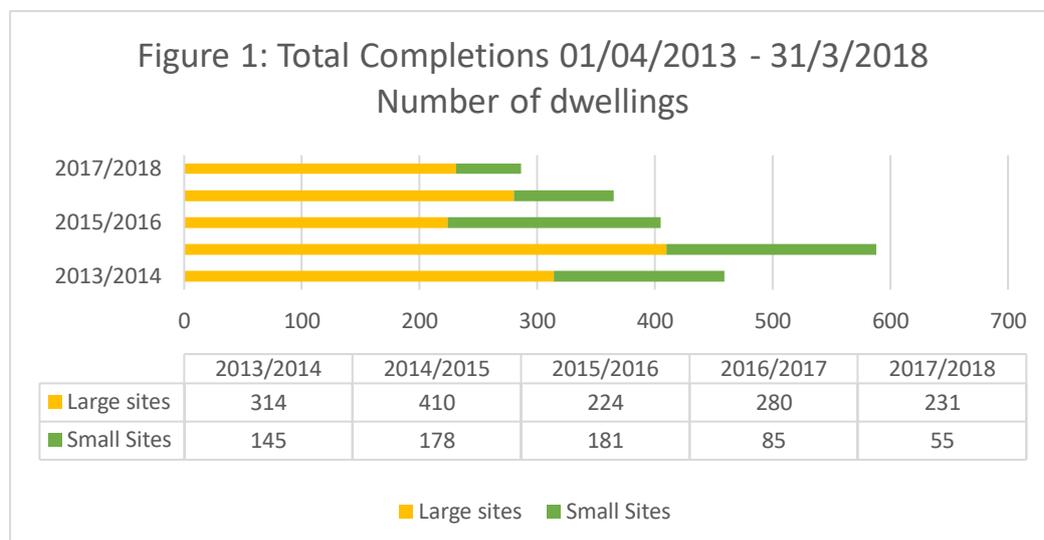
Format of report

- viii. In accordance with the guidance in Draft LDP Manual Edition 3, this report considers the historic delivery of windfall units across the Plan area. Section 1 looks at Historic Analysis. The period 2013-2018 is assessed as this is the period during which LDP 1 was in place. Earlier Development plans including the JUDP had a more generous 'infill and rounding off' policy across a significant number of settlements. On this basis a comparison with this period is not considered robust. LDP 2 is proposing a settlement hierarchy and policy approach closely aligned with that of LDP1 and therefore a comparison with delivery of windfall units under that Plan is considered realistic and appropriate. Section 2 considers which period of abnormally high or low completion rates are inappropriate for inclusion within a future extrapolation rate. The conclusions identify the total windfall figures that are considered realistic as projections within the LDP Deposit Housing Supply tables.

² Paragraph 5.19

Section 1: Historic Analysis

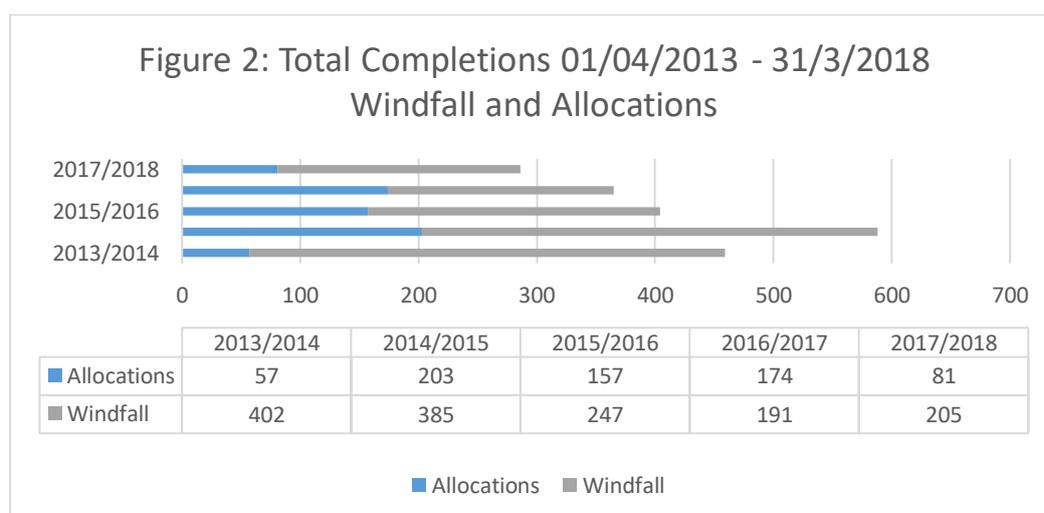
Figure 1: Total completions 2013-2018



Source: JHLAS 2014-2017

- Figure 1** sets out the Council's monitoring information on completions from the period post adoption of LDP 1 up to 2018. It demonstrates that the majority of completions have taken place on large sites. The completions on small sites (those of under 5) are all known to be windfall sites. This means that in the period monitored of the large sites – some are allocations and some are windfall.

Figure 2: Windfall completions 2013-2018



- Figure 2:** demonstrates the significant contribution that windfall sites make to overall completions in Pembrokeshire. However, within the figures for windfall, particularly in the early years of a new Plan some sites allocated in a

previous Plan which gained planning permission are built out. **Figure 3** shows the windfall figures and allocations, but identifies which of the LDP 2 windfall units were actually former JUDP allocations.

Figure 3:

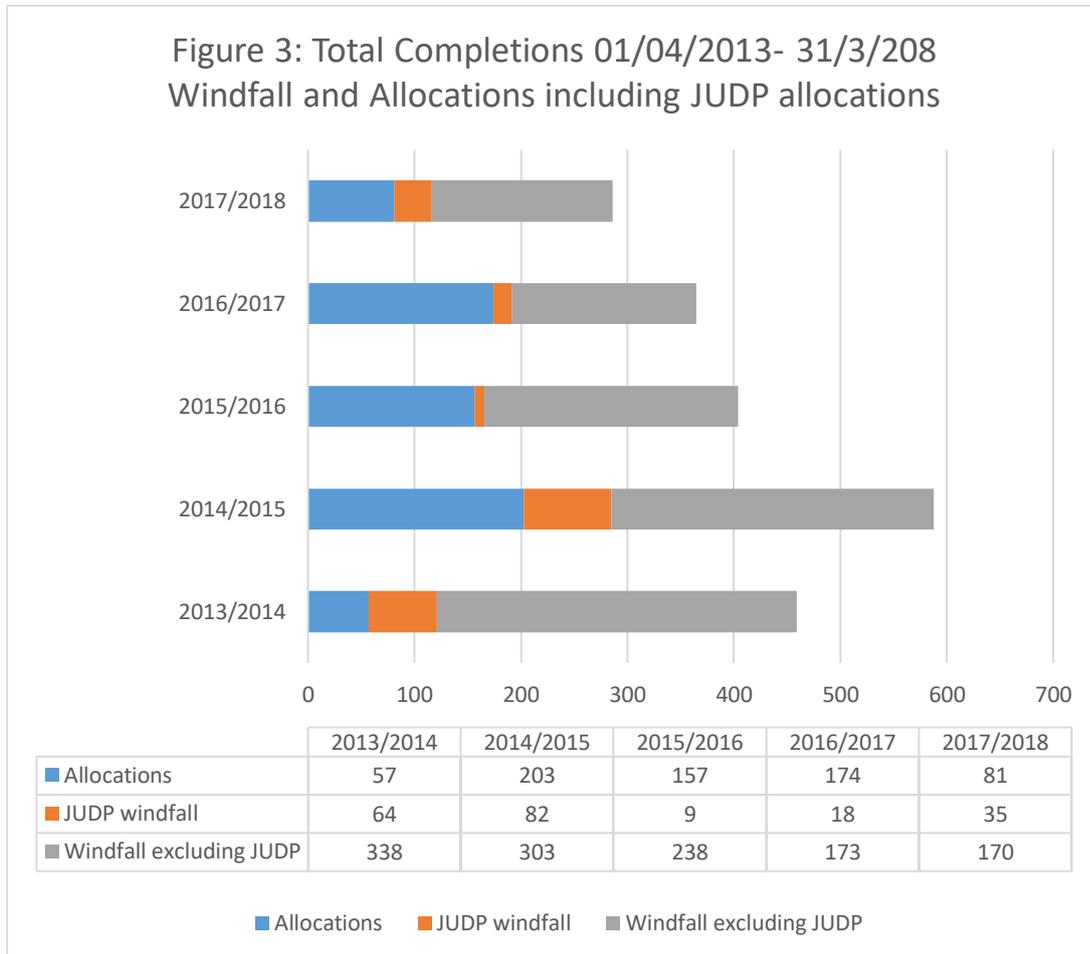
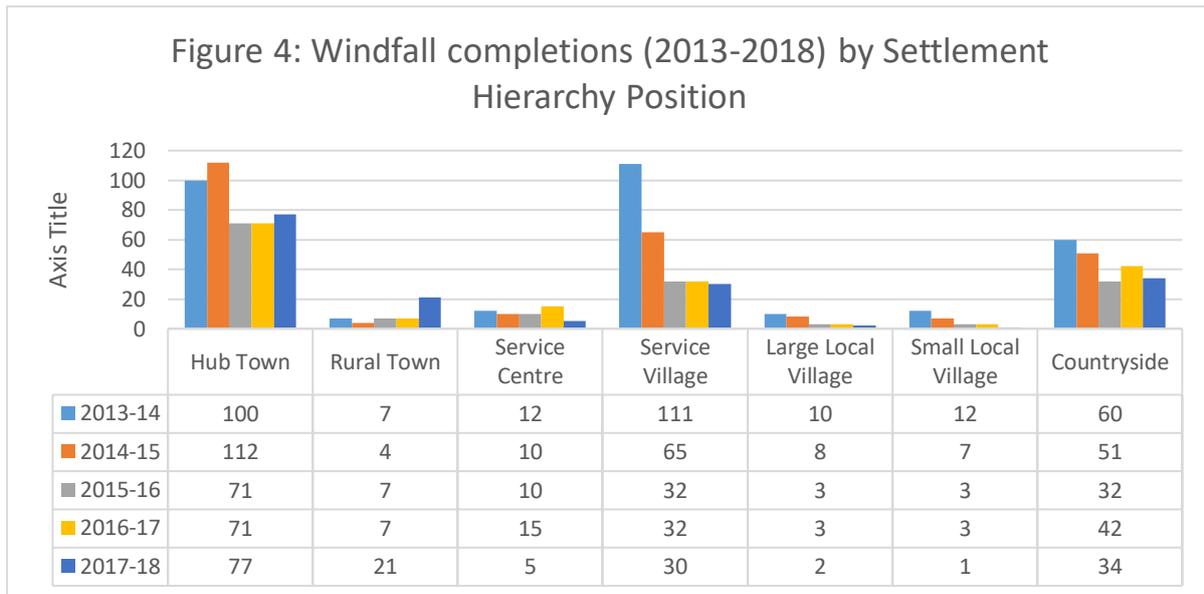
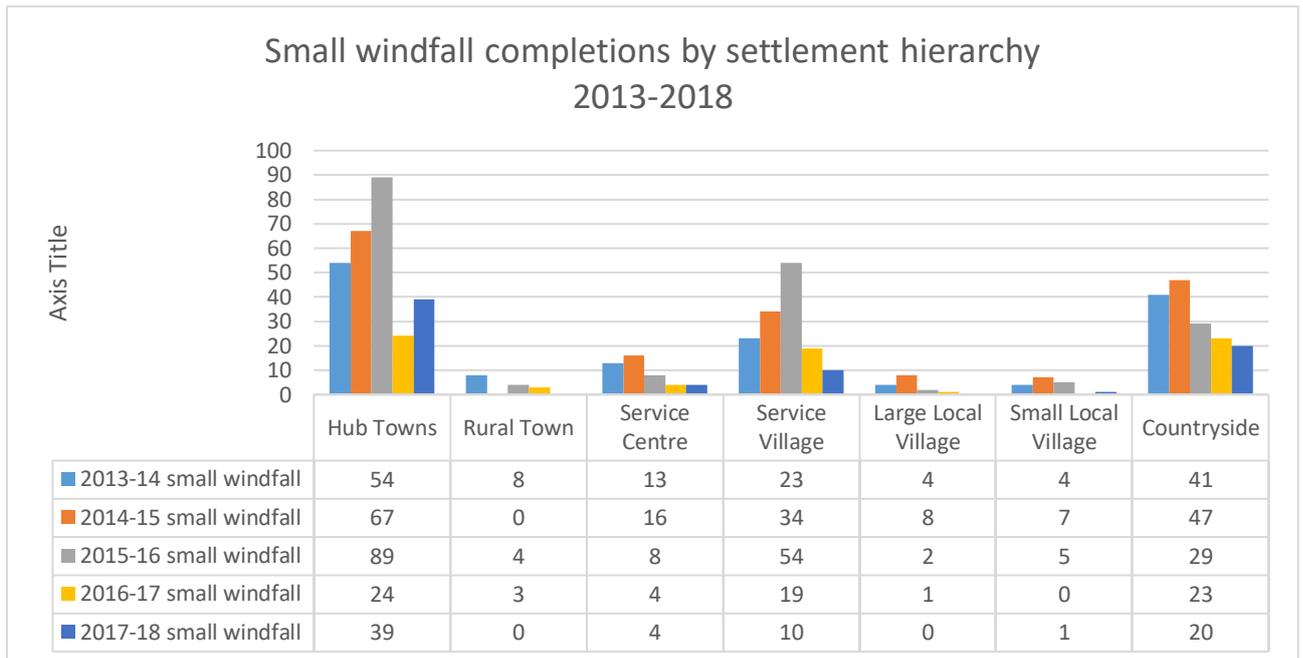


Figure 4:

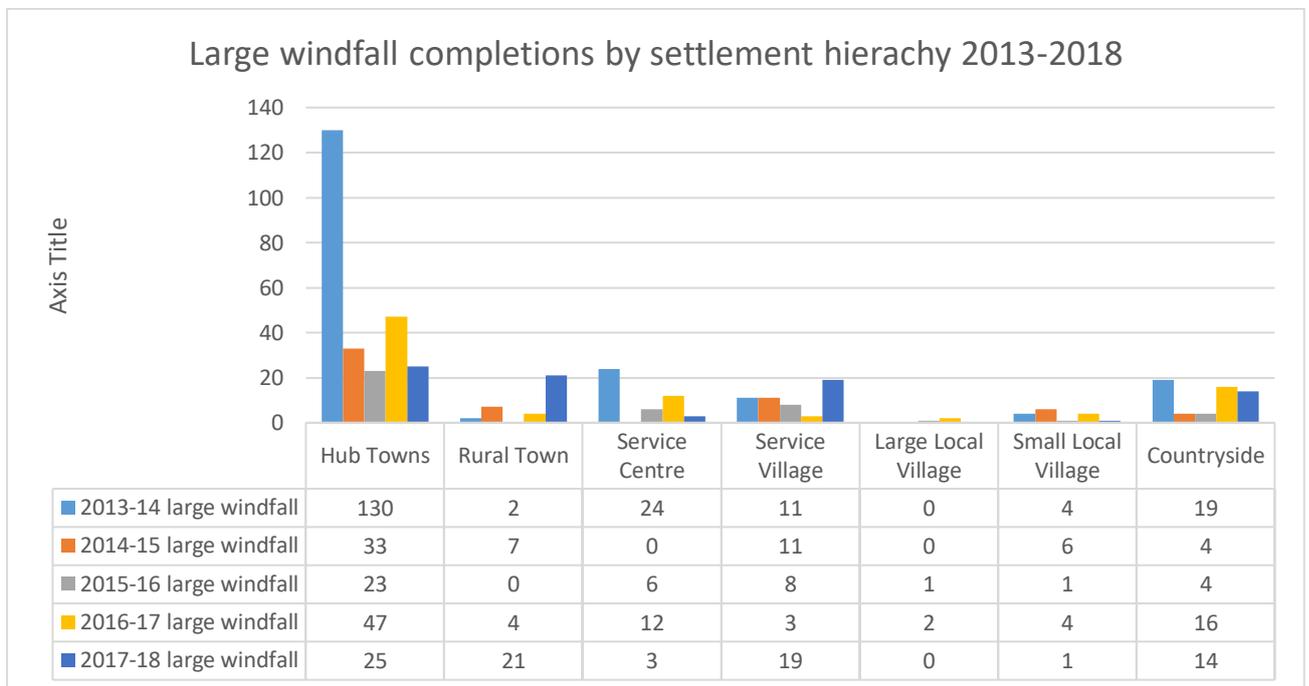


3. **Figure 4** demonstrates the split of windfall completions by hierarchy position between 2013-2018. The greatest proportion of completions has been delivered in the Hub Towns, however the number of settlements at Service Village level means that these provide a significant contribution as well, albeit a contribution which has declined during the Plan period. The windfall completions within the Countryside have steadily declined through the Plan period from a high of 60 in 2013. These completions are primarily barn conversions, permissions for rural enterprise dwellings under TAN 6 and One Planet Developments.

Figure 5



4. **Figure 5** demonstrates the number of windfall units that were built on small sites (0-4 in size) by settlement hierarchy position.
5. **Figure 6** demonstrates the number of windfall units that were built on large sites (5+) by settlement hierarchy position.



Section 2: Discounting Outliers, Calculating a Windfall Allowance for LDP 2

6. The full tables listing units completed by settlement are included in Appendix 1. Within the settlement hierarchy totals, there are some abnormally high or low figures. In attempting to calculate a meaningful future delivery figure it is important to discount these 'outliers'.
7. The following figures have been discounted when calculating a future windfall figure:

Figure 7: Table of Outliers

Reference	Discount Outlier	Reason
Narberth	Discount 2018 – outlier 21, use average of remaining years	Significantly higher than average other years.
Countryside	Use 2018 figure instead of average.	Consistently downward trend on the number of units being converted from barns. Reflects finite supply.
Johnston	Discount 2014 figure – use average of remaining years.	Significantly higher than average other years.
Exception sites	Discount	Discount as these are by their nature not anticipated and an exception to the norm.
Local Village category	Exclude Cuffern figures	Permitted under a different policy regime – would not gain permission under LDP 1 or emerging LDP2.
Milford Haven	Exclude 2014 large windfall figure – 108 outlier.	Single large windfall site unlikely to be replicated.
Pembroke Dock	Exclude 2015 and 2016 large windfall figures.	These are untypically low and do not reflect the average.

Letterston	Exclude 2014 small windfall outlier	This is untypically high and does not reflect the average.
Hook	Reduce 2016 figure from 6 to 3 on small windfall.	Reflects typical trends more closely.
Roch	Reduce from 4 to 3 in 2015.	Reflects typical trends more closely.
Service Village	Exclude 2015 small windfall figure from average.	This is untypically high and does not reflect the average.
Local Village	Assume 0 in large windfall delivery	Policy approach under LDP 2 does not allocate or draw settlement boundaries that would permit large sites in Local Villages
Cluster Village	Assume 0 in large windfall delivery	Policy approach under LDP 2 does not allocate or draw settlement boundaries that would permit large sites in Local Villages

Haverfordwest Large Windfall Assumptions

8. In addition to the adjustments set out in the table above, a specific adjustment has been made to the windfall assumptions in Haverfordwest. Within Haverfordwest school reorganisation means that a significant number of former school sites are likely to become available for other uses during the Plan period. Whilst there is insufficient certainty of timescales and precise remaining site boundaries to allocate a number of these sites, the potential to deliver significant windfall housing numbers is high. In addition to the school sites, the Council has included a large former housing allocation at Shoals Hook Lane within the settlement boundary as 'white land'. Issues surrounding highways access and land ownership have prevented this site coming forward to date but the site relates well to the built form of the settlement and is therefore included within the settlement boundary. It is likely that the establishment of a new access for the Haverfordwest High School on the former Sir Thomas Picton Site will reduce traffic on the existing roads around the Shoals Hook Lane site. This increase in potential highways capacity during the Plan period is likely to mean that housing units can gain planning permission on the Shoals Hook Lane site at some point before 2033.

9. Given the combination of large sites that have the potential to come forward in Haverfordwest, the Authority has chosen not to rely on historic delivery rates to generate a Haverfordwest large windfall figure, but is instead assuming a large windfall site delivery figure of 320 over the Plan period.

Conclusions

10. Based on trends from historic analysis and the adjustments set out in Section 2 of this report, the figures in Figure 9 have been identified within the Housing Supply tables for the Deposit Plan.
11. An allowance for large windfall is applied only from 2024 in order to not double-count those larger windfall sites already identified under the JHLAS as commitments and included elsewhere in the Housing Supply. This is in line with the recommended methodology in the Draft Local Development Plan Manual Edition 3.
12. In total the Plan assumes that 916 units will be delivered through large windfall sites and 1374 through small windfall sites during the Plan period.

Figure 9 Large and Small Windfall Site assumptions

	Large windfall sites (5+) post 2024 up to 2033	Small windfall sites (under 5) based on past trends 2019-2033
Haverfordwest	350	171.08
Milford Haven	137.25	12.6
Pembroke Dock	78	221.2
Pembroke	61.2	112
Fishguard	5.4	50.4
Goodwick	9	22.4
Neyland	9	19.6
Exception sites urban	0	0
Main Towns Total	649.85	609.28
Narberth (Rural Town)	29.25	42
Cilgerran	1.8	5.6
Crymych	28.8	16.8
Johnston	15.75	2.8
Kilgetty	1.8	19.6
Lamphey	0	2.8
Letterston	0	24.5
Llangwm	0	2.8
St Dogmaels	0	28
Service Centres	45	98
Service Villages	93.6	255.5
Cluster Local Villages	0	42
Local Villages	0	47.6
Hamlets	0	0
Exception sites rural	0	0
Countryside	99	280
Total for Rural Area	266.85	765.1
Total for Plan Area	916.7	1374.38

Appendices

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
	Haverfordwest/Merlins Bridge	8	1	2	0	4	7	8	20	7	5
	Fishguard	0	0	0	3	0	4	5	4	0	5
	Goodwick	0	0	0	5	0	4	1	0	0	3
	Milford Haven	108	22	3	26	10	4	19	35	8	8
	Neyland	0	5	0	0	0	1	6	0	0	0
	Pembroke	4	4	18	8	0	3	1	16	7	13
	Pembroke Dock	10	1	0	5	11	31	27	14	2	5
	Main Town Totals	130	33	23	47	25	54	67	89	24	39
	Rural Town (Narberth)	2	7	0	4	21	8	0	4	3	0
20	Cilgerran	1	0	0	0	0	0	0	1	0	1
30	Crymych	2	0	6	5	3	0	6	0	0	0
48	Johnston	20	0	0	7	0	0	1	0	0	0
50	Kilgetty	1	0	0	0	0	0	2	2	2	1
52	Lamphey	0	0	0	0	0	0	0	0	1	0
53	Letterston	0	0	0	0	0	10	3	2	1	1
63	Llangwm	0	0	0	0	0	1	0	0	0	0
122	St Dogmaels	0	0	0	0	0	2	4	3	0	1
	Service Centre Total	4	0	6	12	3	3	16	8	4	4
1	Abercych	0	0	0	0	0	1	0	0	0	2
3	Begelly	0	0	0	1	7	0	0	0	1	1
6	Blaenffos	0	0	0	0	0	0	0	2	2	0
7	Boncath	0	0	0	0	0	0	0	0	2	2
15	Carew/ Sageston	0	0	0	0	0	0	0	2	0	0
22	Clarbeston Road	0	0	0	0	0	1	2	0	1	0

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
151	Clunderwen	0	0	0	0	0	0	1	0	0	0
25	Cosheston	0	2	0	0	0	1	1	0	1	1
28	Croesgoch	0	0	0	0	0	0	0	0	0	0
29	Crundale	4	0	0	0	3	1	3	1	3	0
33	Eglwysrw	0	0	0	0	0	0	0	0	0	0
35	Freystrop	0	1	0	0	1	2	0	1	0	0
42	Hermon	1	1	0	0	0	0	0	0	0	0
43	Hill Mountain	0	0	0	0	0	0	2	1	1	0
44	Hook	0	0	0	1	3	1	3	3	1	0
45	Houghton	0	0	0	0	0	0	0	2	0	0
46	Hundleton	0	0	0	0	0	0	1	0	1	1
47	Jeffreyston	0	0	0	0	0	1	0	0	2	0
49	Keeston	0	0	0	0	0	0	0	0	0	0
51	Llanddewi Velfrey	0	0	0	0	0	0	0	0	0	0
60	Llandissilio	0	0	0	0	0	0	0	0	0	0
66	Llanstadwell	0	0	0	0	0	1	1	0	0	0
67 & 69	Llanteg/Llanteglos	0	0	0	0	0	0	3	0	0	0
81	Maenclochog	0	0	0	0	0	1	1	0	0	0
85	Mathry	0	0	0	0	0	2	0	0	1	0
89	New Hedges	0	0	0	0	0	0	3	1	0	0
94	Pelcomb Cross	0	0	0	0	0	0	0	0	0	0
97	Penally	0	0	0	0	0	2	2	3	0	0
99	Pentlepoir	0	0	0	0	0	2	1	0	1	0
108	Puncheston	0	0	0	0	0	0	0	0	0	0
113	Robeston Wathen	0	0	0	0	0	0	0	0	0	0
114	Roch	2	3	1	1	1	2	3	0	0	1

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
116	Rosemarket	1	0	0	0	0	0	0	1	1	0
118	Scleddau	0	0	0	0	0	1	0	0	0	0
119	Simpson Cross	0	0	0	0	0	0	0	0	0	0
120	Spittal	3	1	0	0	0	2	0	0	0	1
121	Square & Compass	0	0	0	0	0	0	0	0	0	0
123	St Florence	0	1	0	0	0	0	3	2	0	0
128	Summerhill	0	0	0	0	0	0	0	0	0	0
130	Tavernspite	0	0	0	0	0	2	1	0	0	0
131	Tegryn	0	2	0	0	0	0	0	1	0	0
132	Templeton	0	0	7	0	4	0	2	1	1	1
135	Tiers Cross	0	0	0	0	0	0	0	0	0	0
149	Wolfscastle	0	0	0	0	0	0	0	0	0	0
	Service Village Total	11	11	8	3	19	23	33	21	19	10
154	Barnlake	0	0	0	0	0	0	0	0	0	0
8	Broadmoor	0	0	0	0	0	0	0	0	0	0
11	Burton	0	0	1	0	0	1	2	0	1	0
12	Burton Ferry	0	0	0	1	0	0	0	1	0	0
14	Camrose	0	0	0	0	0	2	3	1	0	0
19	Castlemorris	0	0	0	0	0	0	0	0	0	0
N/A	Cresselly	0	0	0	0	0	0	0	0	0	0
31	Deerland	0	0	0	0	0	0	1	0	0	0
56	Little Newcastle	0	0	0	0	0	0	0	0	0	0
78	Lower Freystrop	0	0	0	0	0	0	0	0	0	0
80	Maddox Moor	0	0	0	0	0	0	0	0	0	0
82	Maiden Wells	0	0	0	0	0	0	0	0	0	0
84	Mascle Bridge	0	0	0	0	0	0	0	0	0	0

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
87	Milton	0	0	0	0	0	0	2	0	0	0
100	Pen-y-Bryn	0	0	0	0	0	1	0	0	0	0
102	Pleasant Valley	0	0	0	0	0	0	0	0	0	0
105	Postgwyn	0	0	0	0	0	0	0	0	0	0
117	Sardis	0	0	0	0	0	0	0	0	0	0
134	Thornton	0	0	0	1	0	0	0	0	0	0
146	Waterston	0	0	0	0	0	0	0	0	0	0
	Cluster Village Total	0	0	1	2	0	4	8	2	1	0
2	Ambleston	1	1	0	0	0	1	0	0	0	0
13	Bwlch-y-Groes	0	1	0	0	0	0	0	0	0	0
23	Cold Blow	0	0	0	0	0	0	2	0	0	0
N/A (000/01323)	Cuffern	2	3	1	3	0	0	0	0	0	0
32	East Williamston	0	0	0	0	0	0	1	1	0	0
41	Hayscastle Cross	0	0	0	0	0	0	0	1	0	0
51	Lampeter Velfrey	0	0	0	0	0	0	0	0	0	0
55	Little Honeyborough	0	0	0	0	0	0	1	0	0	0
58	Llandeloy	0	0	0	0	0	0	0	0	0	0
62	Llangolman	0	0	0	0	0	0	0	0	0	0
71	Llanychaer	0	0	0	0	0	0	0	0	0	0
72	Llawhaden	0	0	0	0	0	1	0	0	0	0
79	Ludchurch	0	0	0	0	0	0	0	0	0	0
90	New Inn	0	0	0	0	0	0	0	0	0	0
92	Newchapel	0	0	0	0	0	0	0	0	0	0
94	Pelcomb Cross	0	0	0	0	0	0	0	0	0	0
101	Penycwm	0	0	0	0	0	0	0	0	0	0

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
103	Pont - yr - Hafod	0	0	0	0	0	0	0	0	0	0
104	Portfield Gate	0	0	0	0	0	0	0	0	0	0
109	Redberth	0	0	0	0	0	0	1	0	0	0
110	Reynalton	0	0	0	0	0	0	0	0	0	0
125	St Twynnells	0	0	0	0	0	0	0	0	0	0
124	St Nicholas	1	0	0	0	0	0	0	1	0	0
127	Stepaside	0	0	0	0	0	0	0	2	0	1
136	Trecwn	0	0	0	0	0	0	0	0	0	0
137	Treffgarne	0	0	0	0	0	2	0	0	0	0
139	Trefgarn Owen	0	0	0	0	0	0	0	0	0	0
142	Uzmaston	0	0	0	0	0	0	0	0	0	0
144	Walton East	0	1	0	1	1	0	2	0	0	0
N/A	Whitehill	0	0	0	0	0	0	0	0	0	0
148	Wiston	0	0	0	0	0	0	0	0	0	0
150	Wolfsdale	0	0	0	0	0	0	0	0	0	0
151	Woodstock	0	0	0	0	0	0	0	0	0	0
	Local Village Total	2	3	0	1	1	4	7	5	0	1
000/01419	Johnston (Langford)										
000/01420	Square & Compass										
000/01421	Llandissilio (Maesbryn)										
152/LDP/01	Clunderwen										
099/00043	Pentlepoir		18								
118/00010	Sceddau		27								
123/00038	St Florence		14								
123/00042	St Florence				10						
114/00021	Roch		12								

Settlement Code	Name	Large site windfall					Small Site Windfall				
		E - 2014	E - 2015	E - 2016	E - 2017	E - 2018	F 2014	F 2015	F 2016	F 2017	F 2018
	Exception (rural)	0	71	0	10	0	0	0	0	0	0
034/00333	Fishguard					13					
	Exception (urban)	0	0	0	0	13	0	0	0	0	0
	Countryside	17	4	4	16	14	41	47	29	23	20