

**South Gloucestershire Council**  
**Local Plan Phase 3: Towards**  
**Preferred Strategy**

**Small Sites Windfall Topic Paper**

December 2023

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## 1. Purpose of Topic Paper

- 1.1. This paper has been prepared and released as part of the South Gloucestershire new Local Plan, Phase 3 consultation, in December 2023.
- 1.2. The term ‘windfall site’ is used for sites which are brought forward through the development management process and are not included as specifically allocated land in the Local Plan. ‘Small sites’ are sites with 1-9 homes.
- 1.3. The Council currently includes as part of its annual housing trajectory update a windfall allowance for 210 new homes from small sites, per annum. This paper considers housing contributions of small sites windfalls since 2006/07, the base date of the adopted Core Strategy up to 2022/23, and assesses the potential for identifying windfall contributions that may come forward over the plan period up to 2040.
- 1.4. The findings of this paper will form an evidence base for reviewing and setting a new windfall allowance figure to be used for supporting the council’s new housing trajectory and future 5-year housing land supply for the new Local Plan.

## 2. Background

- 2.1. The National Planning Policy Framework paragraph 71 states the following:

“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.”
- 2.2. In accordance with the NPPF (September 2023), the method for determining a future anticipated windfall allowance will be based both on past trends and future projections, applying reasonable judgement to ensure that a justified and appropriate figure is reached.
- 2.3. The National Planning Policy Guidance at paragraph 71 states that:

*“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.”*

- 2.4. South Gloucestershire Council's Core Strategy was adopted on 11 December 2013. As part of the Inspector's Report into the examination of the Core Strategy, the Inspector at paragraphs 9 and 90X of his report considered a case was made for the inclusion of small site windfalls in the Councils Land Supply:

*Para 89 “.....On average 159 windfall dwellings on small sites have been built annually for the last 23 years. Since the start of the plan period this has risen to 254 dwellings per year (dpa) [PSM8].*

*Para 90- “..... The Council's Residential Land Availability Survey for April 2012 [EB17/2] indicates there are sites with planning permission (including those under construction) for 662 dwellings on small sites once a 10% lapse rate has been incorporated to allow for unimplemented permissions. I therefore consider there is ample evidence to show that windfalls have been and remain an important component of housing supply in South Gloucestershire justifying the inclusion of an allowance in the calculation that equates to 150 dwellings per annum in addition to the small site commitments that benefit from planning permission.*

- 2.5. 2.5 Applying this approach, the council in presenting its annual housing trajectory [2025] And as evidence in this paper will highlight, monitoring since adoption of Core Strategy has shown at least 210 units delivered consistently in South Gloucestershire. The council is therefore confident that in setting a new small sites windfall allowance for the new Local Plan period (2025 to 204), this should not be less than 210 pa and that there are strong grounds to consider if this figure should be further increased.

### **3. Windfall Methodology**

- 3.1. The method for setting this topic paper is based upon the NPPF and NPPG guidance and analysis of delivery rates of small windfall sites between 2006/07 and 2021/22 that have been granted planning permission. This comprises:
- Confirmation of all housing completions for each monitoring year with a breakdown of small site windfalls (1-9 dwellings).
  - Windfalls categorised into:

- Rural<sup>1</sup> and urban<sup>2</sup> sites
  - Sites of 1-4 dwellings and sites of 5-9
  - Brownfield and Greenfield
- Analysis of the completions and any historical trends to determine whether the Council is achieving or exceeding the current 210 windfall allowance.
  - Analysis of the above data to present the council's case to justify a reasonable figure for anticipated housing delivery from windfall sites, considering future supply projections, policy changes and market trends.

## 4. Work to Date: Assumptions and Methods

### Monitoring Processes

- 4.1. Residential land availability survey (RLAS) is undertaken by the Council annually each April and May. This survey monitor sites that are available for housing development through current planning permissions. Surveys are split into large sites (10+ dwellings) and small sites (1-9 dwellings). Each site is recorded as either not started, under construction or complete. Currently no small sites are allocated in the Council's adopted Development Plan and thus are all classed as windfalls. The council reports the number of completed small sites each year as part of its Authority's Monitoring Report, you can view these [here](#).

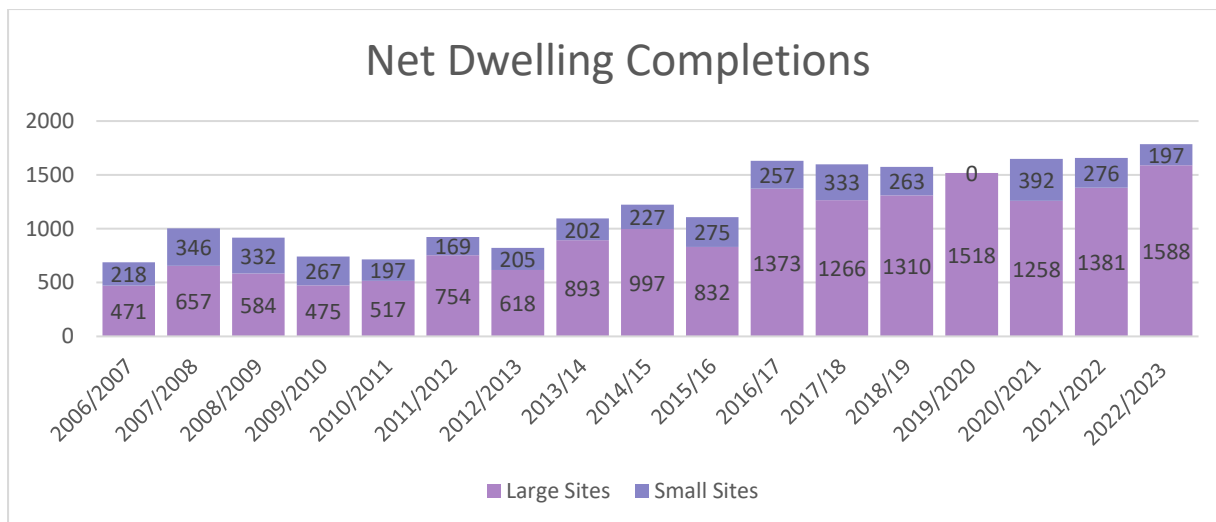
### Small Site Windfall Completions

- 4.2. Historically over the last 17 years, small site windfalls of less than 10 dwellings have made an important contribution to housing supply across South Gloucestershire. Delivering 20% of all completions over that period and averaging 244 per annum as illustrated by figure 1 below.

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<sup>1</sup> Rural areas comprise the open countryside, the coastal/estuary areas, and settlements outside the settlement boundaries of the North and East Fringes of the Bristol urban area, excluding land within the settlement boundaries of Thornbury, Yate and Chipping Sodbury and the Severnside employment area.

<sup>2</sup> Urban areas comprise the North and East Fringes of the Bristol urban areas and within the settlement boundaries of Thornbury, Yate, Chipping Sodbury and the Severnside employment area.



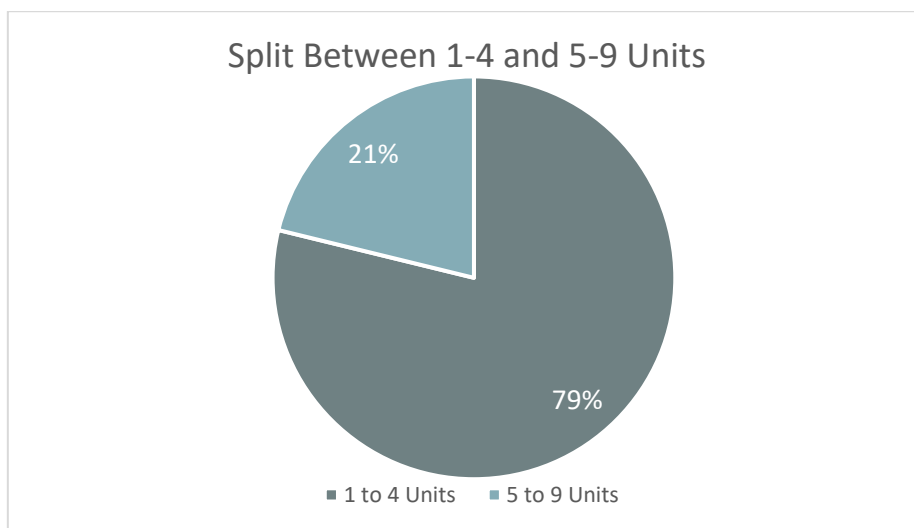
**Chart 1 – Net Dwelling Completions 2006/07 – 2022/23**

**Stock of Small Site Windfalls**

- 4.3. As of February 2023, there were 1,096 dwellings categorised as small site windfalls, with planning permission, of which 253 dwellings are under construction.
- 4.4. Of the small site windfalls with planning permission:
  - 759 units are on sites of 1 - 4 units.
  - 337 units are on sites with 5 - 9 units.
- 4.5. Allowing for a lapsed rate of 10% for the 843 sites with planning permission but not yet under construction, this gives 759 sites as deliverable. When added to the 253 under construction this gives 1,012 small sites over the next 3 years. An average of 337 per annum. This is considered sufficient to justify the continuation of a small sites windfall allowance and also supports the case for a further increase.
- 4.6. Monitoring of planning applications shows small sites are being submitted at an average of 320 dwellings per annum. Applying a 20% discount to account for both planning permission refusals and lapses of consents, it is considered reasonable that if applications for small sites were used as a source, it would be acceptable to assume up to 250 competitions per year. This provides further justification for increasing the small sites windfall allowance for the housing trajectory period of the new Local Plan.

**Development Size**

- 4.7. The chart below shows historic small site windfall completions by development size between 2006/07 and 2021/22. These are broken down into 2 categories: sites of four or fewer dwellings and those accommodating between 5 and 9 dwellings. Please note, these figures are based on gross completions and any demolition on small sites have not been factored in.



**Chart 2 – Percentage split between sites of 1-4 and 5-9**

4.8 It is evident from this analysis that the majority of small site windfalls are made up of developments between 1 and 4 units.

**Former Land Use**

4.8. The majority of small site windfalls have previously been developed on greenfield land making up 62% of completions.

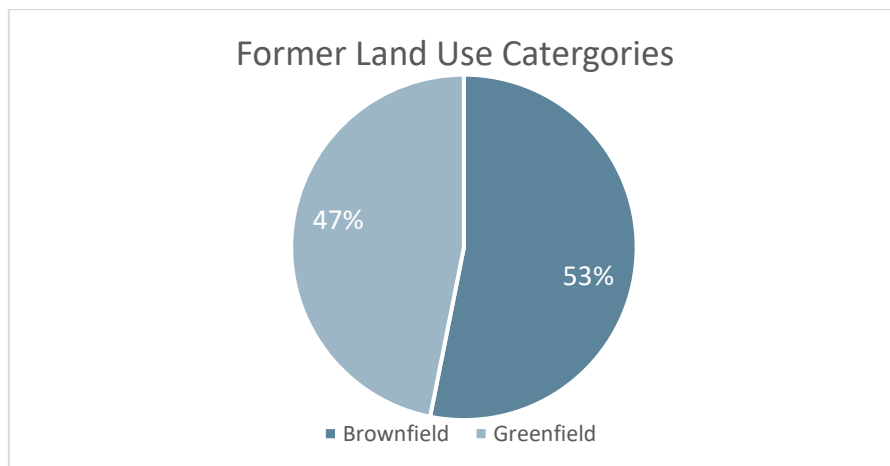


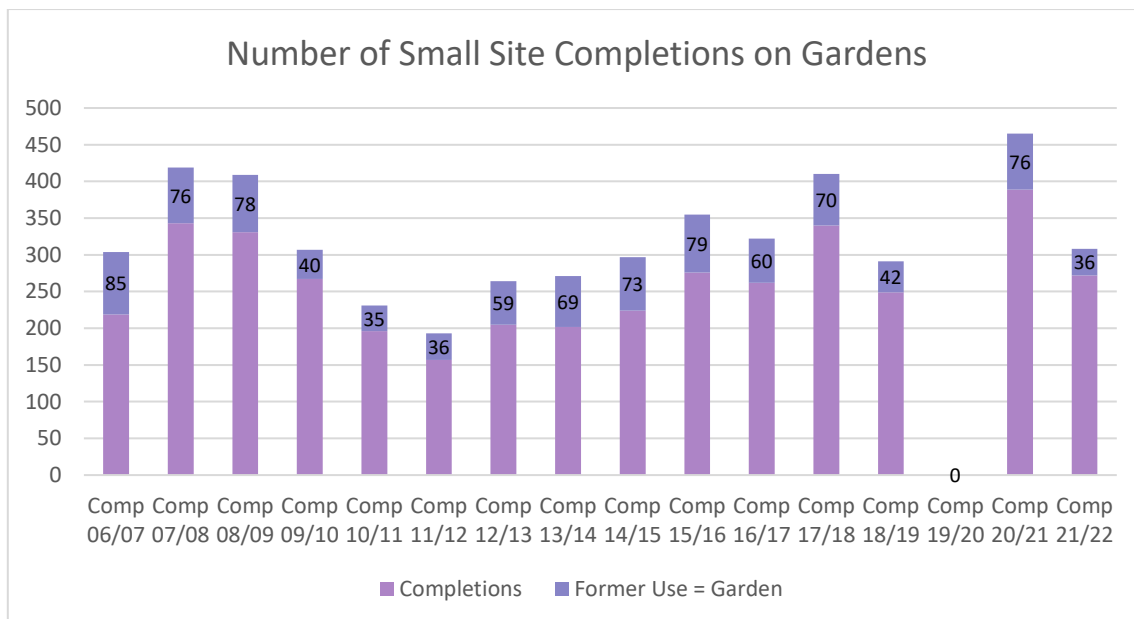
Chart 3 – Percentage split between sites of 1-4 and 5-9

4.9. .

4.10. As stated in section 2, the NPPF at paragraph 71 clearly states that “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.”

4.11. The table below displays the proportion of completions on garden land per annum. This illustrates that through the determination of planning permissions small sites relating to garden land have continued to be a source of delivering small sites since this national policy guidance was introduced. This indicates that the policy position of avoiding harm to local areas has been appropriately applied while balancing this with the need to provide sufficient new homes, shown by the continued permissions and developments since introduction of the NPPF criteria.





**Chart 4 - Number of Small Site Completions on Gardens**

**Rural and urban Split**

- 4.12. The table below displays the breakdown of small sites between urban and rural locations. Urban areas consist of the North and East Fringes of Bristol, Yate, Chipping Sodbury and Thornbury.
- 4.13. The general trend of rural and urban split has been quite consistent since 2006 with an average of 59% of completions being built in urban locations.

Proportion of Small Site Windfall	2006/2007	2007/2008	2008/2009	2009/2010	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023
<b>North Fringe of Bristol</b>	27	67	49	46	35	21	22	30	43	32	33	56	25	0	52	35	
<b>East Fringe of Bristol</b>	76	150	172	121	67	75	101	66	104	132	74	134	81	0	124	102	
<b>Chipping Sodbury</b>	1	1	0	0	4	1	2	15	6	5	1	9	17	0	0	1	
<b>Yate</b>	6	10	17	2	16	7	5	12	2	5	22	8	20	0	0	5	
<b>Thornbury</b>	10	18	2	9	8	2	5	9	6	11	23	3	6	0	20	5	
<b>Urban capacity small sites total</b>	120	246	240	178	130	106	135	132	161	185	153	210	149	0	196	148	
<b>Elsewhere</b>	98	100	92	89	67	63	70	70	66	90	104	123	114	0	174	128	
<b>Small sites district totals</b>	218	346	332	267	197	169	205	202	227	275	257	333	263	0	370	276	
<b>Percentage of small sites in urban areas (%)</b>	55	71	72	67	66	63	66	65	71	67	60	63	57	0	53	54	0
<b>Total Average</b>																	56

**Table 5 – Urban / Rural Split of Small Site Windfall**

## 5. Avoiding duplication and double counting in new Local Plan

- 5.1. The new Local Plan seeks to allocate sites with 5 units or more for the first time. Historically only sites of 10 dwellings or more have been allocated through the Local Plan.
- 5.2. To ensure that the Council is not double counting in its housing forecasts, the total number of units that make up the new allocations between 5 and 9 will be subtracted from the overall small site's windfall allowance. This work will take place at the Regulation 19 stage once potential allocations are confirmed. The topic paper and potential windfall allowance from small sites will be updated accordingly at that stage.

## 6. Opportunities from Other Areas of the New Local Plan

- 6.1. The new Local Plan will be looking to make the best use of land, optimise density and secure an uplift in densities on appropriate locations and sites. The sites and locations are focused on locations within suitable walking distance of designated town centres, and public transport hubs (train station and major bus interchanges). In South Gloucestershire these locations are all within urban areas and the three market towns.
- 6.2. The Phase 2 draft policy set out the proposed approach, consultation on the locations, range of densities for each location and range of criteria to balance optimising density with amenity, quality of life and good design. The policy approach is intended to be carried through to Regulation 19 and adoption. The approach titled Urban Lifestyles in Phase 2 can be viewed [here](#). The draft policy [here](#).
- 6.3. As explained, small windfalls since 2006 have averaged 244 homes a year, of which 60% were within the urban area and market towns. The new Local Plan policy to make the most effective use of land by optimising density will further help to support this element of our supply. This provides additional justification that the small sites windfall allowance can be sustainability increased.

## 7. Summary of findings

- 7.1. Since 2006/2007 South Gloucestershire Council has applied a total of 210 small site windfall units per annum for housing trajectory and 5-year housing land supply purposes. This has been supported at planning appeals.
- 7.2. Over the last 17 years, the average for small site windfall completions per annum is 244, some 16% higher than the 210 annual average.

- 7.3. The majority of small site windfalls, some 79% are made up of sites between 1 and 4 dwellings.
- 7.4. The split between urban and rural locations is 59% urban and 41% rural.
- 7.5. Greenfield sites make up 63% of the overall small site completions in South Gloucestershire.
- 7.6. The current and proposed policy framework, including permitted development rights (PD) changes, continues to support small sites windfalls being delivered and to justify this being further increased.

## **8. Potential Approaches**

- 8.1. Option 1 – Retain the current adopted figure of 210 small sites per annum. This would be a safe approach which has worked well throughout the previous plan period. This option would contribute 3,150 over the 15-year plan period.
- 8.2. Option 2 – Utilise the latest evidenced current average figure of 244 per annum. This option would provide the highest number of small sites forecast in the Housing Trajectory. However, it could perhaps mean we would see more frequent dips below the projected figure due to the cyclical nature of the housing market and the impact that existential events. impact on the delivery of small sites. If the windfall figure does not deliver each year, the plan's 5-year supply of housing would be impacted and increased development from other sources, including large speculative sites across the authority would be needed. This option would contribute 3,660 over the 15-year plan period.
- 8.3. Option 3 - Somewhere in between. A figure of 230 would increase the small site projections by 20 per annum giving an uplift over the plan period, while providing more resilience to the impact of the cyclical nature of the housing market. This option would contribute 3,450 over the 15-year plan period.

## **9. Conclusions and Recommendations**

- 9.1. The analysis in this paper demonstrates a compelling case for the inclusion of a windfall allowance in South Gloucestershire's housing land supply. Small site windfall sites have historically made a consistent contribution to the overall housing delivery, and it is fair to assume they will continue to do so.
- 9.2. Taking the above findings into account, the council intends to progress with option 3. Taking an evidence based but realistic approach that allows for

fluctuations in the delivery of homes on small sites. A small sites, windfall allowance figure of 230 new homes per year will be presented in the new Local Plan and considered a source of supply upto 2040.