

Representations on FBC077 Windfall Analysis Update			
Name of respondent	Specific paragraph (if any)	Issues Raised	Council Response
Gillings Planning on behalf of Persimmon Homes South Coast		Agree that a full revised background paper dated 2022 should be prepared in line with the main modifications consultation.	Noted.
Pegasus Group on behalf of Hammond Family, Miller Homes and Bargate Homes		<p>Update only provides analysis for 2015 to 2021, should be amended to include full windfall analysis period from 2009/10.</p> <p>Inclusion of unallocated large sites in the windfall allowance is unjustified. These sites should be allocated.</p> <p>Large sites included in the windfall analysis were granted some time ago which suggests it is not a reliable source of supply.</p> <p>Large sites should be 10 or more dwellings and on this basis the windfall for large sites would be reduced.</p> <p>Windfall analysis pays no regard to the SHELAA and unreasonably assumes that the rate of the windfall permissions will be maintained notwithstanding the pandemic.</p>	<p>Noted. The update was provided to support the Local Plan examination. An analysis over a period of 7 years is considered to provide a robust evidential basis to support the council's position.</p> <p>As set out in the Windfall Background Paper, sites identified as developable in the SHELAA prior to receiving permission are excluded in the windfall analysis. In addition, windfall large sites are excluded from the local plan supply for the first 5 years.</p> <p>To ensure accuracy, the windfall analysis looks at sites' completions, not permissions. Larger sites often take longer to deliver than small sites.</p> <p>The Council use a threshold on 5 dwellings or more in line with the SHELAA.</p> <p>As set out in the Windfall Background paper, sites identified as developable in the SHELAA prior to receiving permission are excluded in the windfall analysis. As large windfall sites are excluded from the local plan supply for the first 5 years the effects of the pandemic on windfall is likely to be minimal.</p>

<p>Southern Planning Practice on behalf of Raymond Brown</p>		<p>Not straightforward to understand information in terms of why sites are included in the table but then excluded from the windfall analysis and the time periods over which the analysis has been undertaken.</p> <p>Permissions for domestic annexes and ancillary outbuildings to the windfall results has been included.</p>	<p>Noted. The Windfall Background Paper sets out how the analysis has been undertaken. The update provided an extract from the data which has been used in the analysis. The update was provided to support the Local Plan examination. An analysis over a period of 7 years is considered to provide a robust evidential basis to support the council's position.</p> <p>The data is provided by Hampshire County Council who provide a consistent approach across the county. This data includes annexes in the net gains. The annexes identified in the data each have a separate address point in the Local Land and Property Gazetteer. It is acknowledged that four of the annexes are referred to as ancillary to the existing dwelling and therefore these could be excluded. This would not however alter the overall average of 50 dwellings per annum for small sites.</p>
<p>Woolf Bond Planning on behalf of Foreman Homes</p>		<p>There is no list of historic permissions for large sites which have subsequently been implemented which the authority subsequently relies upon as windfalls.</p> <p>It is essential that the analysis does not duplicate other sources of supply.</p> <p>Sites on the Brownfield Land Register should not be included in the windfall supply, draws particular attention to small sites.</p>	<p>The windfall analysis update includes both small and large sites and sets out which of the large sites have been excluded and why.</p> <p>As set out in the Windfall Background Paper, sites which are allocated in the plan or have been assessed as developable in the SHELAA prior to receiving planning permission have been excluded from the windfall supply.</p> <p>Brownfield sites are not included in the windfall analysis. The requirements for entry on the Brownfield Land Register are sites which are at least 0.25ha or capable of delivering at least 5 dwellings. Therefore, small sites from a windfall perspective are</p>

		<p>No information is provided to confirm that past housing delivery which has informed the windfall allowance is not derived from the Broad Location of Growth in Fareham Town Centre which could result in double counting.</p>	<p>not eligible to be included in the Brownfield Land Register.</p> <p>The Broad Location of Growth is currently a retail and commercial area and does not include residential provision at present. As such this area has not provided a historic windfall contribution.</p>
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