

Windfall Allowance:

Background Paper

For the East Hampshire District
(outside the South Downs National
Park)

October 2025



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1. Introduction

- 1.1 The National Planning Policy Framework (NPPF) glossary defines windfall sites as *“sites not specifically identified in the development plan”*. Paragraph 75 of the NPPF allows local authorities to make an allowance for windfall sites as part of anticipated supply. However, local authorities may only make an allowance for windfall if they have *“compelling evidence that they will provide a reliable source of supply”*. In addition to this, any windfall allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 1.2 The Planning Practice Guidance (PPG) on housing and economic land availability assessment states a windfall allowance may be justified in the five-year housing land supply calculations. It also advises that local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area.
- 1.3 There is a strong track record in East Hampshire of windfall sites being delivered. The Local Planning Authority (the Authority) strongly believes that this is an aspect of future housing delivery that should be taken into account in the housing trajectory for the emerging Local Plan period 2025 to 2043, as well as for the purposes of monitoring five-year housing land supply.

2. Background

- 2.1 The purpose of this report is to form part of the evidence base for the emerging Local Plan 2025-2043 and provide a justification for inclusion of a windfall allowance in the Authority's housing trajectory, as well as the Authority's five-year housing land supply. This report re-examines the windfall analysis that supported the current Local Plan: Joint Core Strategy (JCS), which looked at housing contributions between 2000 and 2011 from both large and small windfall sites, as well as housing contributions post 2011 that had not been previously considered.
- 2.2 The JCS Inspector (2014) acknowledged that new housing will not only come forward on allocated sites but also through windfall sites. The Inspector was content that windfalls had been maintained throughout the previous recession (2008-13) but advocated that a cautious approach should be taken given the inherent unpredictability of supply from this source. The windfall allowance used to support the JCS was based on housing completions between 2000 and 2011. It considered completions on sites of nine dwellings or less and applied a 25% discount to account for removal of sites on garden land (based on previous national guidance) and new policies that could affect potential housing delivery. Once these reductions were considered, the windfall allowance for East Hampshire (outside the South Downs National Park - SDNP) was 72.4 dwellings per annum (dpa).
- 2.3 The Authority has chosen to re-examine the methodology used to calculate this figure to reflect multiple changes to the NPPF and PPG, as well more recent completions, and provide updated evidence for a windfall allowance to be included in the Authority's housing figures.

3. Methodology

- 3.1 Windfall development comprise sites that have unexpectedly become available over time, and which were not anticipated by the Authority as part of a Local Plan. These sites are granted planning permission in accordance with adopted local and national policies and contribute towards housing figures. Windfall completions and commitments can vary in size and type of development, including large sites (over 10 dwellings), such as those that may arise from the closure of a large commercial unit, or much smaller projects such as a residential conversion, or a new flat built over the top of a shop.
- 3.2 The Framework and the Planning Practice Guidance have been used to undertake this windfall report. The report essentially takes a four-step approach in setting out a windfall allowance for East Hampshire (outside the SDNP):
- A. Records historic windfall completion rates;
 - B. Examines the results over the study period;
 - C. Analyses historic trends;
 - D. Estimates future housing delivery from windfall sites, considering:
 - Whether there is enough evidence for the inclusion of a windfall allowance in the Authority's housing trajectory;
 - whether the annual windfall completion rate is likely to increase or decrease;
 - the impact of future market conditions and possible policy changes;
- 3.3 The NPPF requires that when calculating windfall allowance, consideration must be given to the Strategic Housing Land Availability Assessment (known as the Land Availability Assessment or LAA by East Hampshire District Council (EHDC)). The Authority's LAA assesses sites capable of delivering five or more dwellings. As such, sites of four or less dwellings would not be included in the LAA and planning permissions of this size are therefore considered windfall. However, it should be noted that historically windfall sites have still occurred within East Hampshire (outside the SDNP) that are between 5-9 dwellings, as well as sites of 10 dwellings or more. If a larger windfall allowance is to be included, it is important that it not only reflects past trends but also has consideration of the LAA to avoid any potential double counting. For the purposes of this report, windfall sites exclude the following:
- Allocations (including Reserve Allocations) in the Local Plan: Second Review (2006)
 - Strategic Allocation at Whitehill & Bordon (JCS, 2014)
 - Allocations in the Local Plan: Housing and Employment Allocations (2016)
 - Allocations in any Made Neighbourhood Plans
 - Sites contained within the Land Availability Assessment (2025) and previous versions
- 3.4 It should be noted that revisions to the NPPF no longer refer to windfall sites being on previously developed land or considers exclusions should be made to development in residential gardens. Therefore, the windfall analysis throughout this report will consider all development that was not anticipated by the local planning authority, factoring in exclusions related to previous Land Availability Assessments for robustness.

- 3.5 All figures referred to throughout this report reflect the total net completions as windfall, therefore, all losses/demolitions have been accounted for.

4. Analysis of Past Trends

- 4.1 Past delivery rates from windfall development have been obtained using the detailed housing completion data provided by Hampshire County Council as part of its annual monitoring conducted on behalf of EHDC. This includes information on the location and type of development, as well as the detailed planning application description. Based on housing completions data, this report considers the delivery of windfall sites since 1st April 2011 to 31st March 2025, which is part of the plan period of the currently adopted Joint Core Strategy (JCS). It also considers the completions and subsequent windfalls from 2000 to 2011, which formed the basis of previous windfall analysis. This extensive period has been chosen as it incorporates respective periods of stronger and weaker economic performance.
- 4.2 Table 1 presents the total number of windfall completions (all sizes) in East Hampshire (excluding the South Downs National Park) from 2011 to 2025, which provides compelling evidence that windfall development has consistently delivered a significant proportion of the Authority's housing completions.

Table 1: Completions and Windfall Development (2011-2025)

	Completions	Windfall	%
2011/12	264	191	72.3%
2012/13	279	169	60.6%
2013/14	325	102	31.4%
2014/15	485	185	38.1%
2015/16	404	220	54.5%
2016/17	424	143	33.7%
2017/18	791	127	16.1%
2018/19	948	107	11.3%
2019/20	626	78	12.5%
2020/21	360	91	25.3%
2021/22	495	101	20.4%
2022/23	455	77	16.9%
2023/24	252	38	15.1%
2024/25	642	48	7.5%
Total	6,750	1,677	24.8%

- 4.3 As demonstrated by Table 1, housing completions have risen since 2011, mainly attributed to the increased housing needs associated with the Joint Core Strategy and its supporting evidence base, compared with the housing requirements established in the South East Plan.
- 4.4 The percentage of dwellings coming forward as windfall in relation to overall completions has decreased since 2011 as more sites were known to the local planning authority and identified in Land Availability Assessments and/or formed part of any Local Plan/Neighbourhood Plan allocations. However, there has always remained an

element of windfall development, accounting for around a quarter of all housing delivery in East Hampshire (outside the SDNP) during this time.

- 4.5 It is considered beneficial to analyse the delivery of windfall completions in relation to site size to determine if windfall assumptions should differ depending on the size of site. Table 2 shows that since 2000, on average, a larger number of windfall completions (61 dwellings per annum) have occurred on smaller sites, compared with large (52 dpa) and minor (27 dpa) sites. As mentioned previously, the number of overall windfalls has steadily declined since 2011 due to a greater knowledge of potential sites, however, this decline is particularly relevant on larger sites. On average, 40 dwellings per annum were completed on large windfall sites between 2011-2025, compared with 68 dwellings per annum between 2000-2011. Windfall completions on minor sites has remained relatively consistent over the two periods.

Table 2: Breakdown of Windfall Development by Site Size (2000-2025)

Windfall Analysis				
	Large	Minor	Small	Total Windfall
2011/12	99	40	52	191
2012/13	65	28	76	169
2013/14	38	16	48	102
2014/15	75	50	60	185
2015/16	123	49	48	220
2016/17	27	27	89	143
2017/18	21	23	83	127
2018/19	13	26	68	107
2019/20	19	29	30	78
2020/21	35	10	46	91
2021/22	43	8	50	101
2022/23	0	33	44	77
2023/24	0	0	38	38
2024/25	0	15	33	48
Total 2011-25	558	354	765	1677
Average	39.9	25.3	54.6	119.8
Total 2000-2011	751	310	752	1813
Average	68.3	28.2	68.4	164.8
Total 2000-2025	1309	664	1517	3490
Average	52.4	26.6	60.7	139.6

- 4.6 As a result of the above analysis and with a view toward predicting future windfall rates in the East Hampshire (outside the SDNP), it is considered a different approach should be taken to small sites (four dwellings or under) compared to minor and large sites (five dwellings or more).

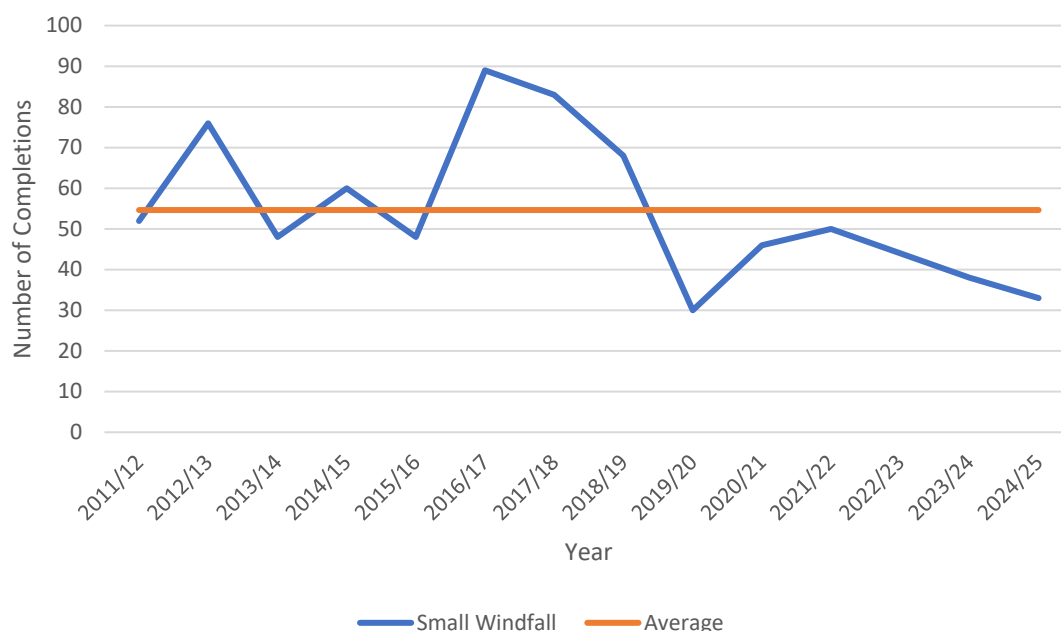
Small Site Windfall

- 4.7 Table 2 shows there has been historic delivery of windfall on a variety of site thresholds and it is clear that small sites (4 dwellings or less) are the most significant in terms of delivery across the three thresholds. On average 42.5% of windfall has been provided on small sites between 2000 and 2025. This is on average 60.7 dwellings per annum

which are being brought forward on sites of four dwellings or less. Since the beginning of the JCS plan period (2011) there has been on average 54.6 dwellings per annum on small sites, which is equivalent to 45.6% of all windfalls.

- 4.8 Figure 1 shows that although the number of windfall completions on small sites fluctuates, there is no evidence to suggest that the sources are diminishing. Historically, East Hampshire (outside the SDNP) has experienced significant and consistent windfall gains from small sites, and this has continued during the JCS plan period (2011 to date). Delivery from this source is expected to continue as national planning policy guidance seeks to boost housing supply. At a local level, policies in the adopted and emerging Local Plans promote the best use of land, especially in existing settlements, so small site windfall is expected to continue into the future.

Figure 1: Windfall Completions on Small Sites (2011-2025)



Large and Minor Site Windfall

- 4.9 There are no restrictions stipulated in the NPPF on the size of site which can be classed as windfall. The defining characteristic of a windfall site is that it is a site which has not been allocated or identified through the Local Plan process. The PPG¹ stipulates that a windfall allowance can be included in association with the identity of developable sites and broad locations in years 6-15 of the plan period. However, whilst it is noted that the LAA does not have the scope to be able to identify all potential sites of five dwellings or more, for the whole plan period, it is important that past trends are considered alongside further information in the LAA.,
- 4.10 The comprehensive monitoring of housing data provided by Hampshire County Council identifies sites which were allocated through Local Plans and/or Neighbourhood Plans, as well as those which arise outside the local plan process. Furthermore, all housing data analysed throughout this report has sought to remove sites contained within previous versions of the Land Availability Assessment. This avoids any potential double counting with sites that may be allocated in the emerging local plan and makes it possible to investigate the extent to which large and minor

¹ PPG Paragraph: 023 Reference ID: 3-023-20190722

windfall sites (of five or more dwellings as opposed to small sites of four or fewer dwellings dealt with in the small site allowance above) have contributed to land supply in the past. Whilst it is considered conservative to exclude LAA sites, as such sites are “not specifically identified in the development plan”, it represents a robust approach to determining a windfall allowance. This approach is further endorsed by the significant increase in housing need (as a result of the new standard method), which is likely to result in considerably more ‘included’ LAA sites becoming allocations in the new local plan.

- 4.11 The data in Table 2 shows that, excluding sites identified as either an allocation or in previous versions of the LAA, there were a total of 1,973 net completions on large and minor windfall sites in East Hampshire (outside the SDNP) since 2000, which is equivalent to 79 dwellings per annum. More recently, there were a total of 912 net completions on large and minor windfall sites between 2011 and 2025, equivalent to 65 dwellings per annum.
- 4.12 Despite the past trends, Figure 2 shows that the number of windfall completions on large sites has declined since 2011, however, supply from this source has still occurred until 2021/22. The main reasoning for this decline is the greater awareness of such sites as part of the LAA process. Despite many sites being known through their identification in the LAA, they may have still been granted permission through speculative applications, due to the Council’s lack of land supply. Whilst such development is not considered as part of a windfall allowance, it should be acknowledged that such housing provision has not historically been attributed to plan-making. However, as EHDC prepare the emerging local plan to meet objectively assess housing needs, it is more likely that such sites will feature as allocations. In a similar manner to small sites, Figure 3 shows that the number of windfall completions on minor sites fluctuates, However, similarly to the large sites being identified in the LAA, many of these sites are now known and not considered windfall.

Figure 2: Windfall Completions on Large Sites (2011-2025)

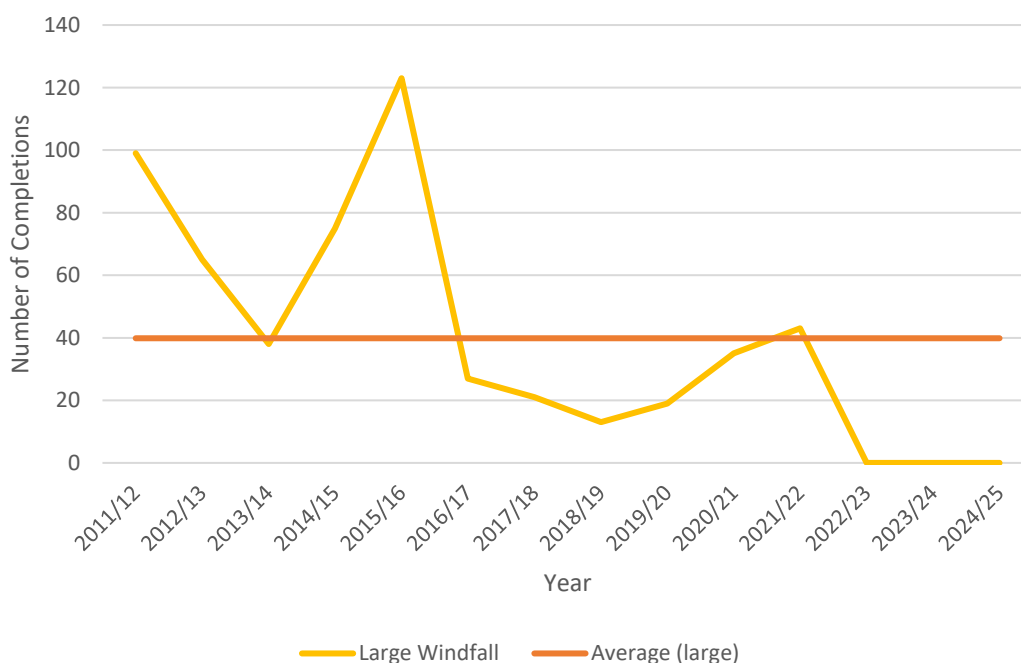
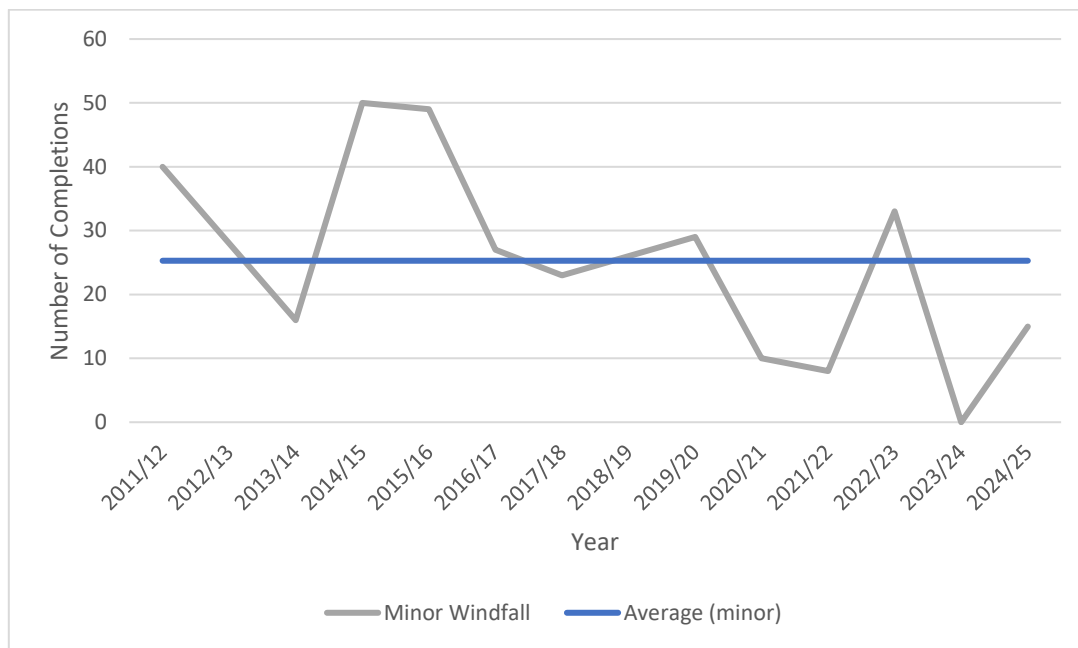


Figure 3: Windfall Completions on Minor Sites (2011-2025)



- 4.13 Despite the above analysis and historic supply of large site windfall, we anticipate numbers will continue to decline as more sites are likely to be allocated to meet the authorities housing need. As more sites will be allocated, we do not consider the past trends will continue and therefore EHDC consider only small site windfall (less than 4 dwellings) is appropriate to be included in the future.

5. Future Impacts

National Policy

- 5.1 Over the period of time during which this windfall allowance has been assessed there have been significant changes to national policy. The introduction of the NPPF in 2012 (updated in July 2018, February 2019, July 2021, December 2023 and December 2024) has allowed increased flexibility provided by policies that have encouraged windfall through a variety of sources. In particular, there is a more lenient stance regarding change of use from commercial to residential through the introduction of Prior Approval.
- 5.2 Prior Approval also applies for the conversion of agricultural buildings to residential. These changes, alongside changes to Permitted Development Rights has encouraged more landowners to pursue residential development, with the result of increasing the number of windfall completions. At the national level there have been more recent changes made to national planning policy, regulations and guidance, notably in the form of the revised National Planning Policy Framework, which have sought to boost housing supply. The Change of use classes was also amended in September 2020, which introduced 'Class E' in order to allow a building to be used flexibly by having a number of uses taking place concurrently or by allowing different uses to take place at different times of the day. As of August 2021, these commercial buildings associated with 'Class E' can be granted permission for residential use via a fast-track prior approval process. These changes are likely to increase windfall development.

- 5.3 The most significant changes to national policy have come from the new Labour government (July 2024) in form of the updated NPPF and associated PPG in December 2024. The revised NPPF and associated PPG reintroduced the need for EHDC to demonstrate a five-year supply of housing (rather than four years) and also included an updated Standard Method for calculating housing need. The new Standard Method uses the housing stock in a local authority area as the starting point for calculating housing need and then an enhanced affordability uplift (which differs from the original Standard method) is applied to produce the housing need figure. The current (May 2025) housing need for the district is 1,124dpa. Given the Governments ambition to significantly increase housing supply, more sites are likely to be known and allocated in the emerging Local Plan, in order to meet the need, thus reducing the potential windfall on larger sites.

Market Conditions

- 5.3 The time period over which past windfall trends have been assessed includes a significant period of economic depression, which is shown clearly in the analysis of past trends. Although average numbers of windfall reduced slightly from 2011 to 2025 compared with 2000 to 2011, this was not the case for small windfall sites. Table 2 (as well as Figures 1-3) shows large windfalls have reduced over the two-time periods, but small (and minor) site windfall has remained relatively consistent.
- 5.4 Therefore, in order to remain conservative, only the reduced windfall delivery figures associated with 2011 to 2025 will be used when calculating the small site windfall allowance.
- 5.5 There was a period of almost three months during the Covid-19 pandemic when inactivity in construction during the initial March/April 2020 'lock-down' which would have resulted in less completions and infrastructure provision than originally intended. However, as mentioned previously, all windfall data assessed has included previous economic depression associated with the 2008-2013 period. It should also be noted that the windfall data also includes a period of recession that occurred in late 2023, which the economy then swiftly exited in the first half of 2024.

Discounting Planning Permissions in the First Phase of the Plan Period

- 5.6 For the purposes of the windfall allowance (as part of both the five-year housing land supply calculation and Local Plan trajectory), the windfall allowance will not be included in the first three years of the housing supply. This is because it is assumed that all windfall sites likely to be completed in the first three years will have already been through the planning application process and would therefore result in double counting.

Amendments to Settlement Policy Boundaries

- 5.12 As part of the emerging Local Plan, a full review will be made of Settlement Policy Boundaries (SPBs) in East Hampshire (outside the SDNP). The main aims for reviewing SPBs is to ensure that settlement boundaries are logical and easy to identify on the ground, and to identify what parts of the settlement should and should not be included in the settlement boundary. As a result of these amendments there will be the release of smaller development sites, which will give greater opportunities for windfall development.
- 5.13 Updated settlement hierarchy work (2023) has also led to a number of proposed new settlement boundaries for additional settlements, namely; Lower Froyle; Upper Wield; Oakhanger; Shalden; and, Lasham which were previously considered countryside.

The inclusion of new settlement boundaries within these locations is likely to further increase the opportunities for windfall development. However, to maintain a conservative approach, the Authority do not intend to increase the windfall allowance as a result of these amendments.

Wealden Heaths Phase II Special Protection Area

- 5.14 The Wealden Heaths Phase II is made up of four separate Sites of Special Scientific Interest (SSSIs) and qualified as a Special Protection Area (SPA) for its breeding bird species. In 1998 the area was classified as a Natura 2000 site. It is protected from adverse impact under the EC Habitats Directive which is interpreted into British law by the Conservation of Habitats and Species Regulations.
- 5.15 As part of plan making and to meet the requirements of the Habitats Regulations, policies within the JCS recommended that any new housing located within 400m of the SPA were required to carry-out project-specific Habitats Regulations Assessment as part of the planning application process. It was also concluded that approximately 33 windfall dwellings (cumulatively and on schemes of 5 or less dwellings) could be expected to come forward during the plan period and would be unlikely to have an impact on the SPA.
- 5.16 However, monitoring of the early years of the JCS plan period demonstrated that a significant number of windfall schemes for dwellings had been granted planning permission within the 400m buffer zone. Therefore, in 2015 with the support from Natural England, East Hampshire District Council commissioned work to reassess the windfall allowance within 400m of the Wealden Heaths Phase II SPA using an updated methodology. The results of this work demonstrated that the windfall allowance could be increased to 43 dwellings.
- 5.17 The capacity for additional dwellings within 400m of the Wealden Heaths Phase II Special Protection Area has been used up considerably faster than anticipated at the time the JCS was prepared. Therefore, in July 2018 the East Hampshire District Council and the South Downs National Park Authority adopted Supplementary Planning Guidance (SPG) to set out the approach the two authorities will take to help meet the needs of residential uses where the need cannot be met outside the 400m buffer zone (specifically Gypsy, Traveller and Travelling Showpeople accommodation and rural affordable housing exception sites). Planning applications for other forms of residential development that result in a net increase in residential dwellings within 400m of the Wealden Heaths Phase II SPA in East Hampshire District (including the area within South Downs National Park) will be refused, unless meeting relevant material planning considerations and supported by a Habitats Regulations Assessment and, where necessary, an Appropriate Assessment that demonstrates that the development would not result in harm to the SPA, and that has been agreed by the Competent Authority (East Hampshire District Council or the SDNPA) in consultation with Natural England. If applications are permitted through this process, the net increase in dwellings would not count towards the total windfall allowance.
- 5.18 Future windfall development within the 400m buffer of the Wealden Heaths Phase II SPA are likely to continue to be restricted in the future. From 2011 to 2025, there were a total of 27 net windfall completions within the 400m buffer of the SPA, equivalent to 1.9 dwellings per annum.
- 5.19 As windfall development will continue to be restricted in the future within 400m of the Wealden Heaths Phase II SPA, it has been concluded that the windfall allowance should be reduced by 2 dwellings. This reduction is reflective of past trends and maintains the Authority's conservative approach to windfall development.

Low Density Neighbourhoods

- 5.20 The Authority's Neighbourhood Character Study (2018) has shown that many residential areas across the district have been developed at low densities. This has been influential in establishing their residential character and ensuring their integration with their often-rural setting. However, these residential areas are under pressure from the creeping effects of unsympathetic urbanisation, which has encouraged minor alterations of a more urban style to homes in these areas (for example, in the treatment of boundaries and front gardens/parking areas).
- 5.21 Some neighbourhoods have been protected from the effects of more intensive development through saved policies H9 and H10 of the East Hampshire District Local Plan: Second Review (2006). Policies H9 and H10 apply to particular areas in East Hampshire, but the Neighbourhood Character Study has shown that other residential streets and neighbourhoods share similar characteristics. The threats to these characteristics are likely to be common across the district
- 5.22 The emerging Local Plan will establish a new approach to the appropriate density of new residential development across the planning area, taking account of national planning policies and guidance on the ten characteristics of well-designed places within the National Design Guide. This approach will focus on ensuring that features of new built form that contribute to perceptions of local character are appropriately designed to respect their context, as indicated through Policy DES3 of the Draft Local Plan (2024). This is unlikely to reduce the level of future windfall development.

Changes to the last Windfall projection associated with the JCS

- 5.24 The Authority's last windfall projection supported the JCS and demonstrated a windfall allowance of 72.4 dwellings per annum. This figure not only included small sites but also minor sites capable of delivering between five and nine dwellings. Previous guidance referred to windfall development only being on previously developed land (therefore, excluding garden land), plus changes to planning guidance were made to remove indicative minimum densities. As a result of this, past windfall allowances applied a 25% discount. However, as past trends show, windfall development has consistently formed part of East Hampshire's (outside the SDNP) housing land supply and is expected to do so in the future.
- 5.25 Following revisions to the NPPF and PPG, windfall sites are no longer considered solely on previously developed land. Given the evidence above, a small site windfall allowance of **53 dpa** compared with 72.4 dpa represents a realistic approach based on more up-to-date data.

6. Windfall Projections

- 6.1 Based on the preceding analysis, the windfall projections for East Hampshire (outside the SDNP) are **53 dwellings** per year from small site delivery (less than 5 dwellings). Despite historic delivery of windfall on minor and large sites, these figures will no longer be included within the windfall allowance to represent the change to national policy

that is likely to lead to more sites being allocated in prospective local plans. As stated in Section 5, to further ensure a cautious approach when calculating windfall projections, windfall delivery for small sites has been projected to commence from year four onwards. This is because it is assumed that prior to these dates, many of the likely housing completions will already be known through planning permissions, and as such are not therefore windfall/unexpected.

- 6.2 Table 3 draws upon the analysis set out in the previous sections of this report to formulate a windfall projection for the plan period of the emerging East Hampshire District Local Plan 2025-2043.

Table 3: Windfall projections

Plan Year	Small Sites	Total
2025/26	0	0
2026/27	0	0
2027/28	0	0
2028/29	53	53
2029/30	53	53
2030/31	53	53
2031/32	53	53
2032/33	53	53
2033/34	53	53
2034/35	53	53
2035/36	53	53
2036/37	53	53
2037/38	53	53
2038/39	53	53
2039/40	53	53
2040/41	53	53
2041/42	53	53
2042/43	53	53
Total Plan Period	795	795

- 6.3 This level of projected windfall delivery will be monitored regularly by EHDC to ensure the overall housing delivery projections are kept up to date to assist in the determination of housing land supply.

7. Conclusion

- 7.1 The evidence shown in this report demonstrates that based on historic windfall rates, windfall sites have consistently come available within East Hampshire (outside the SDNP) even during a time of economic recession. Failure to include an allowance for this consistent stream of supply within the housing land supply for the Authority would result in an under-estimate in the capacity of East Hampshire (outside the SDNP).
- 7.2 It is also considered that in the light of both national and local planning policy, windfall sites will continue to be permitted and delivered in the future. Figures show that on average, windfalls have an annual average completion rate of 140 dwellings per annum from 2000 to 2025, with a slightly lower average of 120 dpa in the latter part of this period (2011-2025). However, based on the analysis in this report, it is likely that windfall will be more prevalent on small sites only.
- 7.3 Figures show that on average, small site windfalls have an annual average completion rate of 61 dwellings per annum from 2000 to 2025, with a slightly lower average of 55 dpa in the latter part of this period (2011-2025). Therefore, a conservative windfall allowance of **55 dwellings** per annum (only based on more recent small site windfalls) is considered both realistic and achievable. In order to reflect the restrictive nature of windfall development being allowed within 400m of the Wealden Heaths Phase II SPA, the windfall allowance has been further reduced by 2 dwellings per annum. This results in a windfall allowance of **53 dwellings** per annum in East Hampshire (outside the SDNP).
- 7.4 The Authority has also chosen not to include a windfall allowance for development within the first three years of the five-year land supply since many of the sites that come forward within this period would have been captured within the Authority's trajectory as commitments. However, the full small site windfall allowance of **53 dwellings** per annum will be made from year four onwards, totalling **795 dwellings** across the residual emerging plan period (2025-2043). A total of **106 dwellings** will also be used in future five-year housing land supply calculations.
- 7.5 In terms of monitoring, the level of windfall delivery will be monitored over the course of the Local Plan period alongside overall housing delivery using the above methodology. This will inform the Council if the windfall allowance of 53 dwellings per annum on small sites.