



Mansfield
District Council

Mansfield District Council

Windfall Study

May 2025

Introduction

1. The purpose of this paper is to establish whether there is a trend of completions on windfall sites over the period 2013 to 2023 to inform a decision as to whether an allowance of windfall sites for inclusion in the Local Plan housing trajectory is justified.

National Policy Context

2. The National Planning Policy Framework (NPPF) (2024) defines 'windfall sites' as 'Sites not specifically identified in the development plan'.
3. There is no specific nationally prescribed methodology to calculate a windfall allowance, however the NPPF and PPG provide some guidance as to how a Local Planning Authority could carry such an assessment out and how windfalls should be treated in a policy and decision making context.
4. Paragraph 73 encourages a mix of small and medium sites in a local planning authority's land supply stating they should '...support the development of windfall sites through their policies and decisions...'
5. Paragraph 75 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'.
6. The PPG¹ states 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.

Local Plan 2013-2033

7. The Local Plan 2013-2033, adopted in September 2020, identified a windfall allowance of 380 dwellings, to be delivered later in the plan period 2023-2033. The justification for this windfall allowance figure is set out in Appendix B of the 2018 'Site Selection Technical Paper'. The key assumptions from the windfall study:
 - Windfall is not assumed within the first 3 years of the plan to account for sites with planning permission.
 - The assessment did not include sites included as Local Plan housing allocations, garden land, and sites identified through the previous Housing and Economic Land Availability Assessment (HELAA) process.
 - Sites of up to 5 dwellings - 80% of the windfall completions were included as it is accepted that sites below 5 dwellings will not be picked up through the HELAA.

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

- Sites of between 6-49 dwellings – 20% of the average was assumed to contribute toward the windfall allowance.
- No contribution from sites of 50 dwellings and over.

Windfall Allowance

8. Windfall sites can make an important contribution towards the districts housing land supply in addition to planned development opportunities, primarily allocations in the Local Plan.
9. Historically in Mansfield, the main source of windfall sites is through the development of previously developed land (brownfield land) usually located within a defined settlement boundary. In the context of the district this would be within the Mansfield main urban area or village boundaries within Warsop Parish as defined in the adopted Local Plan (2020). Another source of windfall sites can be unused 'green' land within built up areas such as allotments sites.
10. Windfall sites come forward unexpectedly for many different reasons, these can include change of circumstances for the site or owner, business relocation or closures and the demolition of existing buildings. Windfall sites have not been allocated in the local plan process, but have since gained planning permission.

Methodology

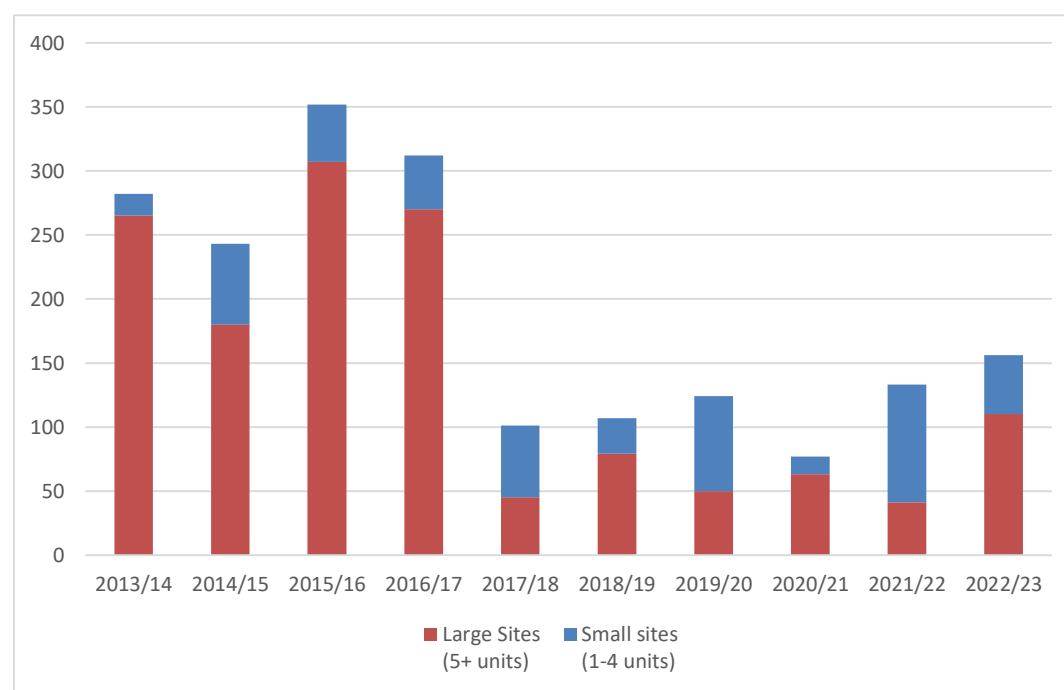
11. This study analyses past windfall completion data and identifies trends in this data from all windfall completions between over the period 2013-2023. This period of assessment is used to ensure commitments and completions since the start of the monitoring year for the Local Plan review, 1 April 2023, are not included within the windfall calculation.
12. When assessing a site for inclusion in the windfall allowance figure the approach that has been taken is a cautious one. The data has been captured from the in-house housing monitoring database. The analysis includes:
 - the contribution of windfall site completions to the annual housing completions;
 - a breakdown of windfall completions by sites of 1-4 dwellings and 5 dwellings and over (5+) – consistent with the collation of the annual monitoring data;
 - a breakdown of completions on greenfield and brownfield (previously developed land) sites; and
 - noticeable variations in completions within the assessment period and possible reasons for these.

Study Findings

13. Table 1 and Figure 1 below show the total number of windfall completions in the district over for the period 2013 – 2023 (by monitoring year). This shows that a steady supply of housing with an average completion rate of 189 dwellings. An average of 48 dwellings are from small sites (1-4 units) and an average of 141 from large sites (5+ units)

Table 1: Windfall completions

Year	Small sites (1-4 units)	Large Sites (5+ units)	Total Windfall Completions
2013/14	17	265	282
2014/15	63	180	243
2015/16	45	307	352
2016/17	42	270	312
2017/18	56	45	101
2018/19	28	79	107
2019/20	74	50	124
2020/21	14	63	77
2021/22	92	41	133
2022/23	46	110	156
Average Windfall Completions (rounded)	48	141	189

Figure 1: Windfall completions by site size between 1 April 2013 and 31 March 2023

14. Table 2 below shows the percentage of housing completions each year delivered on windfall sites compared to total completions. The results show that the district generated an average of 57% of completions from windfall sites.
15. Further analysis shows that on sites of 5 or more, the first 5 years of data resulted in an average of 80% of all completions, however the average for the last five years drops to 32%. Conversely, for sites below 5 dwellings this percentage

remains relatively consistent, from 15% in the first 5 years to 13% in the last 5 years.

16. Reasons for this could be the windfall completions contributing toward the Council maintaining a healthy land supply and less sites being granted planning permission later in the assessment period. Furthermore, a decrease the in percentage of sites of 5+ dwellings corresponds with the Local Plan being adopted in 2020 with the Submission version of the plan published in September 2018 (monitoring year 2018/19). Sites of 5+ dwellings will have been identified for allocation in the emerging and adopted plan, likely to result in less windfall sites being granted planning permission due to the more advanced stage of the plan and greater weight given to the policies and proposals. The application for the approval of reserved matters of Phase 1 of the Land at Berry Hill Sustainable Urban Extension was approved in 2015 with the first completions delivered in the monitoring period 2018/19, a significant contribution toward the housing land supply later in the assessment period.

Table 2: Contribution of windfall to total housing completions

Year	Total Completions	Small sites (1-4 dwellings)	Proportion of small windfall sites of total completions (%)	Large Sites (5+ dwellings)	Proportion of large windfall sites of total completions (%)	Proportion of all windfall sites of total completions (%)
2013/14	295	17	6	265	90	96
2014/15	254	63	24	180	71	95
2015/16	391	45	11	307	78	89
2016/17	367	42	11	270	74	85
2017/18	237	56	24	45	19	43
2018/19	391	28	7	79	20	27
2019/20	402	74	18	50	12	30
2020/21	474	14	3	63	13	26
2021/22	362	92	25	41	11	36
2022/23	380	46	12	110	29	41
Average (rounded)	355	48	14	141	42	57

Table 3: Location of windfall completions

Year	Total		1-4 Dwellings		5+ Dwellings	
	Mansfield	Warsop Parish	Mansfield	Warsop Parish	Mansfield	Warsop Parish
2013/14	204	78	17	0	187	78
2014/15	184	59	63	0	121	59
2015/16	282	70	40	5	242	65
2016/17	265	47	37	5	228	42
2017/18	68	33	48	8	20	25
2018/19	98	9	27	1	71	8
2019/20	118	6	65	6	47	0
2020/21	77	0	14	0	54	0
2021/22	111	22	85	13	22	9
2022/23	148	8	38	8	110	0
Average (rounded)	156	33	43	5	110	29

17. Table 3 provides a breakdown of the windfall completion in the Mansfield urban area and Warsop Parish. The data shows there is a relatively consistent delivery of windfall completions within Mansfield. Table 4 breaks this down further,

demonstrating consistent delivery on brownfield sites within the Mansfield urban area.

Table 4: Windfall completions on greenfield and brownfield sites by area

Year	Mansfield			Warsop Parish			Combined Total
	Brownfield	Greenfield	Total	Brownfield	Greenfield	Total	
2013/14	103	101	204	54	24	78	282
2014/15	75	109	184	40	19	59	243
2015/16	87	195	282	34	36	70	352
2016/17	114	151	265	30	17	47	312
2017/18	28	40	68	30	3	33	101
2018/19	41	57	98	6	3	9	107
2019/20	83	35	118	4	2	6	124
2020/21	62	15	77	0	0	0	77
2021/22	79	32	111	10	12	22	133
2022/23	128	20	148	6	2	8	156
Average (rounded)	80	76	156	21	12	33	189

Table 5: Windfall completions on greenfield and brownfield land

Year	All sites		1-4 dwellings		5+ dwellings	
	Brownfield	Greenfield	Brownfield	Greenfield	Brownfield	Greenfield
2013/14	157	125	13	4	144	121
2014/15	115	128	51	12	64	116
2015/16	121	231	34	11	87	220
2016/17	144	168	31	11	113	157
2017/18	58	43	35	21	23	22
Sub-total avg.	119	139	33	12	86	127
2018/19	47	60	13	15	34	45
2019/20	87	37	51	23	36	14
2020/21	62	15	8	6	54	9
2021/22	89	44	64	28	25	16
2022/23	134	22	39	7	95	15
Sub-total avg.	84	36	35	16	49	20
Total Average (rounded)	101	87	34	14	68	74

18. Table 5 shows a relatively small difference in the average between brownfield and greenfield sites over the 10-year period. However, when looking at the first and last 5 years the average number of completions on greenfield sites decreases from 139 to 36 dwellings. This is again concluded to be reflective of the reasons set out in paragraph 16. It is also evident the percentage difference is most significant on sites of 5+ dwellings – an average of 127 completions over the first 5 years compared with an average of 20 over the last 5 years. This again can be considered to be reflective of sites allocated in the adopted Local Plan of 5 dwellings or more. Delivery on brownfield sites of 5+ dwellings does remain relatively high, with a difference to the average completions in the first and last 5 years of the assessment of 86 compared with 49 dwellings respectively.

19. Windfall completions of sites 1-4 dwellings remain relatively consistent, particularly the delivery on brownfield sites at an average of 34 dwellings. Seven of the ten years are above 30 dwellings with 8 dwellings delivered in the

monitoring year 2020/21, from 35 on the previous year. This increased to 64 and 39 in monitoring years ending 2022 and 2023 respectively. Unlike sites of 5+ dwellings, there is little difference between the first and last five years of the assessment, the last five years seeing a marginal increase in the average of completions on both brownfield and greenfield sites.

20. The consistency in delivery on brownfield sites is to be expected with national and local policy framework supportive of the redevelopment / change of use of suitable brownfield sites compared to new greenfield sites, the majority of which are located outside of settlement boundaries.

Future Trends

21. Due to its nature, windfall sites deliver varying amounts of housing year-on-year which makes it difficult to predict and make allowances for in the housing trajectory. The future contribution of windfall to housing delivery in Mansfield will be influenced by a number of factors.
22. There have been significant changes in planning policy over the period the windfall allowance has been assessed. Flexibility provided by policies in the NPPF has encouraged windfall allowance where this can be justified, particularly the reuse of brownfield sites and redundant buildings. Since the adoption of the Local Plan in 2020, there were further changes to permitted development rights and the use class order with units falling under Commercial, Business and Service (Class E) can now be converted into dwellings with prior approval.
23. The HELAA annual review process (including the live “call for sites”) will proactively aim to identify sites which would otherwise come forward as windfall sites. However, it is important to note that the HELAA does not assess small sites that would yield less than 5 units but these sites are delivering a steady supply of windfall completions. This can be concluded to be partly evidence in the data where windfall completions on greenfield sites begin to decrease significantly at a point in time which had seen a trend of high windfall completions, the submission and adoption of the Local Plan and granting of planning permission of the Land at Berry Hill Sustainable Urban Extension, with the first completions delivered in 2018/19.
24. The review of the Local Plan will significantly influence the type and size of site likely to come forward as windfall completions, with completions likely to arise from brownfield sites on sites of 1-4 dwellings which will not generally be allocated in the Local Plan.

Conclusion

25. It is evident that delivery of windfall sites is an important source of supply within Mansfield. This is to be expected considering the opportunities for the reuse of redundant buildings and regeneration within the Mansfield urban area, and a national and local policy framework supportive of redevelopment of brownfield sites.

26. Windfall sites have contributed an average of 189 dwellings over a 10-year period 2013-2023. The analysis shows a significantly high number of windfall completions over the first 4 years of this period on greenfield sites of sites of 5+ dwellings. When discounting this period of unusually high delivery of completions on greenfield sites, the average over the last 5 years is 119 completions – still proportionately high when compared with total completions over the same period (30%), reflective of a relative consistent delivery of windfall completions on brownfield sites.
27. The consistent delivery on brownfield sites can be expected for the reasons set out above. It is reasonable to assume that a majority, if not all brownfield sites of 5+ dwellings identified for housing or mixed use development in the HELAA are likely to be brought forward for redevelopment. For the purpose of calculating the housing requirement in the Local Plan review, these sites are considered to come forward as allocations in the Local Plan, subject to further assessment and testing. Whilst there may be unidentified sites of 5+ dwellings that may come forward that are not captured in the HELAA and allocated in the Local Plan, the plan will be making the appropriate provision to meet the district's housing need. It is concluded there is no reasonable justification to account for an allowance of windfall completions to come forward on sites of 5+ dwellings.
28. The analysis shows a consistent delivery of windfall completions on sites of 1-4 dwellings, on brownfield and greenfield sites. The average number of completions on sites of this size over the period 2013-2023 is 48 dwellings. Sites of 1-4 dwellings will not be allocated in the Local Plan, it is therefore justifiable to include a windfall allowance for sites of this size.
29. In conformity with the PPG, the windfall allowance is to be assumed to contribute toward the housing trajectory year 6 of the Local Plan and onwards over the last 15 years of the plan. The average of 48 dwellings equates to a total windfall allowance of **720 dwellings**.