

Appendix 6

SURREY HEATH WINDFALL ALLOWANCE JUSTIFICATION

Introduction

The NPPF allows LPAs to make allowance for windfall sites if they have compelling evidence that such sites have consistently come forward in the area and will continue to provide a reliable source of supply. Annex A of Appendix 1 sets out a methodology for identifying Surrey Heath's windfall supply. This appendix applies the methodology to calculate a windfall allowance for the purposes of this SLAA and the calculation of the 5 year supply figures.

The NPPF defines windfalls as "Sites not specifically identified in the development plan." The Borough has identified three types of windfall sites:

- General sites
- Small sites in the pipeline
- Prior notification sites

Each of these types of windfalls are examined below:

General sites

Historic Windfall Delivery Rates

The number of windfall completions in the period 2000 to 2019 by local area is shown in Table 2 below

Table 2: Windfall completions by local area, 2000-2019

Period	Bagshot	Bisley	Camberley	Chobham	Deepcut	Frimley	Frimley Green	Lightwater	Mytchett	West End	Windlesham	Total
2000-2008 Total	3	6	20	6	0	6	5	4	1	2	0	53
2000-2008 Annualised Average	0.38	0.75	2.5	0.75	0	0.75	0.63	0.5	0.13	0.25	0	6.63
2008-2019 Total	21	6	106	18	2	11	5	4	18	4	13	208
2008-2019 Annualised Average	1.91	0.55	9.64	1.64	0.18	1.00	0.45	0.36	1.64	0.36	1.18	18.91
2000-2019 Overall Annualised¹	1.3	0.6	6.6	1.3	0.1	0.9	0.5	0.4	1.0	0.3	0.7	13.7

¹ Rounded to nearest one decimal point for settlement areas only

It is clear from the above that windfalls have historically made a small but consistent contribution towards the Surrey Heath Housing Land supply. There is no reason to believe this would not continue, especially in light of policy contained in the NPPF, in particular the presumption in favour of sustainable development. It is thus considered that a small windfall allowance should therefore be included in the SLAA.

Expected Future Trend by Area

Based on the annualised averages derived in Table 2, a windfall allowance has been calculated for each of the periods covered by this SLAA: 0-5 years, 6-10 years. For the period covering years 11-17 the windfall allowance covers the period up to 15 years only, (years 11-15) as set out in the PPG.

For years 0-5, a total windfall allowance will be included as shown in Table 3:

Table 3: Years 0-5 annualised windfall allowance (2019-2024)

Period	Year	Windfall Allowance
0-5	2019-2020	0
0-5	2020-2021	13
0-5	2021-2022	14
0-5	2022-2023	14
0-5	2023-2024	14
Total 0-5	2019-2024	55

From years 6-15, the PPG allows the inclusion of a windfall allowance based on geographical area². The figures used to compose this allowance are derived from the annualised averages for each settlement area identified in Table 2 and will be included as shown below (numbers are rounded to nearest whole number):

Table 4: Years 6-15 annualised windfall allowance by local area

Period	Year	Total Allowance in Period											Total
		Bagshot	Bisley	Camberley	Chobham	Deepcut	Frimley	Frimley Green	Lighthwater	Mychett	West End	Windlesham	
6-10	2024-2029	6	3	33	7	1	4	3	2	5	2	3	69
11-15	2029-2034	6	3	33	7	1	4	3	2	5	2	3	69
Total 6-15	2024-2034	12	6	66	14	2	8	6	4	10	4	6	138

Based on the annualised average derived from past completion rates of windfalls, 193³ units could be expected to be delivered from unidentified general windfall development over a 15 year period.

It is considered that the above figures represent an extremely conservative estimate of future windfall completions. This is due to the following:

² Planning Practice Guidance paragraph 24, ID 3-24-20140306 - <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

³ Excluding year one – this figure is therefore calculated as 13.7 x 14 years (rounded to the nearest whole number for each settlement area in Table 4 - years 6-15)

- In the 2012 version of the NPPF, paragraph 48 stipulated residential garden redevelopment should be excluded from windfall calculations. Therefore, for years 2000-2018, such sites were not included in the Council's windfall allowance. In reality however such sites have historically made a significant contribution to the Borough's housing figures and there is no indication of this trend slowing down. The version of the NPPF published in 2018 no longer precludes residential garden development from being taken account of in the windfall allowance calculations. Therefore, from the monitoring year 2018-19, such sites have been included in these calculations.
- The constraints imposed on development by the Thames Basin Heaths SPA has resulted in a significant decrease in overall housing completions over the earlier part of the period monitored, which is likely to be mirrored in the number of windfall sites which have come forward during this period.
- From 2000-2008 only sites of fewer than 5 units have been included in the calculations when in fact it is likely that some larger windfall (i.e. previously unidentified) sites are likely to have been developed during this period.

Small sites

These are sites of less than 5 units which are identified in the development pipeline. This includes sites with planning permission that are either yet to commence, or under construction.

At the SLAA base date there were 178 units with planning permission on small sites. These consisted of 59 units under construction and 119 units not yet implemented. The sites are listed in Table 7, at the end of Appendix 5.

Prior Notifications

Alongside the general windfall allowance, a small allowance will be included for dwellings likely to arise from conversions to residential units from other uses (predominantly B1a offices) carried out under the General Permitted Development Order (GPDO). This allowance also takes account of the 2016 amendment⁴ to the GPDO which has made permanent the existing temporary right to change a building used as an office into residential use.

Conversions to residential use carried out under the GPDO are less likely to be identified through a SLAA study except where they are included as a site already benefitting from approval that is either unimplemented or under construction. As these Prior Notification (PN) sites do not require planning permission and can be approved as permitted development, they are highly unlikely to have been allocated or identified for housing. Therefore, it is considered that PN completions for sites that are 1-9 units will be accounted for in the allowance. However, in conformity with the general windfall allowance's historic analysis, sites approved in excess of 9 units will not be accounted for.

Prior notifications for conversions from office to residential development form the bulk of this type of windfall. This type of permitted development was introduced in 2013, and therefore the period of completions for such residential conversions in Surrey Heath covered to inform the windfall

⁴ The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016

allowance will be 2014-2019. This enables a year lead-in for completions of this type of development to occur, following their introduction.

Table 5: Prior Notification Windfall completions by local area, 2014-2019

Period	Bagshot	Bisley	Camberley	Chobham	Deepcut	Frimley	Frimley Green	Lightwater	Mytchett	West End	Windlesham	Total
2014-2019 Total	3	0	26	3	9	8	0	0	0	0	0	49
2014-2019 Overall Annualised	0.6	0.0	5.2	0.6	1.8	1.6	0.0	0.0	0.0	0.0	0.0	9.8

Based on the annualised averages derived in Table 5, a windfall allowance has been calculated for residential development coming forward through prior notifications.

The rate of PN approvals and completions has not slowed down since its introduction and it therefore seems reasonable to expect this to continue in the short term (0-5 years). However, it is noted that this particular element of housing supply is finite, and consequently, the length of the period that this allowance will be applied will need to be subject to limitations. Therefore, the PN allowance will not be applied for the 6-15 year period. Furthermore, as with the general windfall allowance above, no allowance will be included in year 1.

If the number of units granted prior approval for office to residential conversions decreases over a sustained period in future years, the period that the allowance is applied for will also be reduced. This will be reviewed annually.

Table 6: Years 0-5 annualised Prior Notification windfall allowance (2019-2024)

Period	Year	Windfall Allowance
0-5	2019-2020	0
0-5	2020-2021	9
0-5	2021-2022	10
0-5	2022-2023	10
0-5	2023-2024	10
Total 0-5	2019-2024	39

Summary

Surrey Heath currently obtains a windfall housing supply from 3 sources.

Over the next fifteen years these sources are expected to provide 404 units to the housing supply broken down as follows:

- General windfalls (193 units)
- Small sites in the development pipeline (178 units)
- Prior notifications (39 units).

Table 7: Sites Included in Small Sites Allowance

Planning Application no.	Site Address	Units Under Construction	Units Not Started	Units Not Started or Under Construction
2018/0513	45 GUILDFORD ROAD, BAGSHOT, GU19 5JW	0	4	4
2018/0410	FIRST FLOOR 71 HIGH STREET, BAGSHOT, GU19 5AH	0	1	1
2018/0862	Simply Maintained House 71 HIGH STREET, BAGSHOT, GU19 5AH	0	1	1
2017/0733	Bovingdon Cottage Bracknell Road, GU19 5HX	3	0	3
2016/0676	White House, 81-83 High Street, GU19 5AH	0	1	1
2018/0127	hawk Farm Church Lane, GU24 9AE	0	1	1
2018/0205	273 GUILDFORD ROAD, BISLEY, WOKING, GU24 9AG	1	0	1
2015/1027	161 Queens Road, GU24 9AU	1	0	1
2016/0432	105 105 PARK STREET, CAMBERLEY, GU15 3NU	0	2	2
2017/1017	Unit 1A, Bridge Works Bridge Road, GU15 2QR	0	2	2
2017/1017	Unit 1A, Bridge Works Bridge Road, GU15 2QR	0	2	2
2018/0404	12 CALVIN CLOSE, CAMBERLEY, GU15 1DN	1	0	1
2016/0985	24 Cromwell Road, GU15 4HY	0	1	1
2018/0621	139 FRIMLEY ROAD, CAMBERLEY, GU15 2PS	0	4	4
2019/0068	232 Frimley Road, Camberley, GU15 2QH	0	4	4
2018/0195	34 FRIMLEY ROAD, CAMBERLEY, GU15 3BD	0	1	1
2016/0877	Garage Site Greenlands Road, GU15 2RT	2	0	2
2018/1102	Rear of 66a High Street, Camberley, GU15 3RS	0	3	3
2016/0700	1a High Street, GU15 3QU	2	0	2
2015/0362	31 High Street, GU15 3RB	2	0	2
2016/0874	37-39 High Street, GU15 3RB	3	0	3
2017/0329	26 High Street, GU15 3RS	2	0	2
2017/0185	66a High Street, GU15 3RS	0	2	2
2015/1087	4 High Street, GU15 3SX	2	0	2
2016/0927	First Floor and Second Floor 6-8 High Street, GU15 3SX	0	4	4
2016/0875	59-61 High Street, GU15 3UL	0	3	3
2017/1103	333 London Road	0	1	1

Planning Application no.	Site Address	Units Under Construction	Units Not Started	Units Not Started or Under Construction
2018/0446	114 LONDON ROAD, CAMBERLEY	0	1	1
2018/0059	Parkgate House, 185-187 London Road, GU15 3JS	3	0	3
2016/1084	London Court, 116 London Road, GU15 3TJ	0	1	1
2014/1013	St Anns 43 London Road, GU15 3UG	0	1	1
2016/0231	1 Macnaghten Woods, GU15 3RD	0	1	1
2014/0320	3 Marlborough Rise, GU15 2ED	0	1	1
2018/0997	Maywood St James Maywood Drive, Camberley, GU15 1LH	0	1	1
2017/0453	Land Southeast of White Lodge Maywood Drive, GU15 1LH	1	0	1
2018/0827	83 MIDDLEMOOR ROAD, FRIMLEY, CAMBERLEY, GU16 8DF	0	1	1
2016/0906	Brereton Middleton Road, GU15 3TU	1	0	1
2018/0874	16 NEWLANDS ROAD, CAMBERLEY, GU15 2RP	0	1	1
2018/0581	3 OLD PASTURE ROAD, FRIMLEY, CAMBERLEY, GU16 8SA	0	1	1
2014/0686	Clockhouse, 65 Park Street, GU15 3PE	2	0	2
2013/0965	Wessex House 80 Park Street, GU15 3PT	0	2	2
2015/0725	Navana Portesbery Road, GU15 3TD	1	0	1
2018/0380	"35 - 39 PRINCESS WAY AND 1 ALBERT ROAD	0	2	2
2017/0740	CAMBERLEY, GU15 3SP	0	4	4
2016/1115	Vernon House, 16 Southwell Park Road, GU15 3PX	0	1	1
2017/0256	18 Tekels Park, GU15 2LF	0	3	3
2017/0121	7 Priory Court Tuscam Way, GU15 3YX	0	1	1
2016/0813	13 ROBINS BOW, CAMBERLEY, GU15 3NP	0	3	3
2017/0718	1 Westfield Road, GU15 2SG	4	0	4
2018/0598	Garage Block East Wood Road, GU15 2SH	0	2	2
2018/0586	LAND TO THE REAR OF 17 AND 19 YORK ROAD, CAMBERLEY, GU15 4HS	0	1	1

Planning Application no.	Site Address	Units Under Construction	Units Not Started	Units Not Started or Under Construction
2017/0693	18 YOULDEN DRIVE, CAMBERLEY, GU15 1AL	1	0	1
2016/1022	Plants to Go, Chobham Nurseries Bagshot Road, GU24 8SJ	3	0	3
2016/0195	The Plant Centre Bagshot Road, GU24 8SJ	0	1	1
2016/1094	Copyhold Chertsey Road, GU24 8HS	0	1	1
2017/0223	25 Chertsey Road, GU24 8PD	0	1	1
2016/0785	Land at Woodlands Ryde Chobham Park Lane, GU24 8HG	0	2	2
2016/0217	Higher Park Farm Halebourne Lane, GU24 8SL	2	0	2
2015/0685	Higher park Farm HALEBOURNE LANE, GU24 8SL	0	3	3
2015/0684	Highams Farm Highams Lane, GU24 8TD	0	3	3
2017/0436	Magpyes Barn Highams Lane, GU24 8TD	0	1	1
2017/0502	Kingswood Farm, 34 LESLIE ROAD, CHOBHAM, WOKING, GU24 8LB	0	1	1
2018/0469	Latchmere Lodge Pennypot Lane, GU24 8DJ	1	0	1
2017/0107	Land at 15 THE AVENUE, CHOBHAM, WOKING, GU24 8RU	0	1	1
2016/0168	1 The Avenue, GU24 8RU	0	1	1
2018/0962	15 The Avenue, GU24 8RU	0	1	1
2015/0961	BARN AT DINGLEY DELL NURSERIES WEST WINDLESHAM ROAD, CHOBHAM, WOKING, GU24 8SP	0	1	1
2015/0110	Buckstone Farm Windlesham Road, GU20 6LJ	0	1	1
2018/0450	Ascot Park Polo Club, Westcroft Park Farm Windlesham Road, GU24 8SN	0	4	4
2018/0935	18-20 WINDSOR ROAD, CHOBHAM, WOKING, GU24 8LA	0	2	2
2017/0367	22 WINDSOR ROAD, CHOBHAM, WOKING, GU24 8LA	0	1	1

Planning Application no.	Site Address	Units Under Construction	Units Not Started	Units Not Started or Under Construction
2016/1101	Chobham Club, 50 Windsor Road, GU24 8LD	0	1	1
2018/0069	Sandhurst Chalet Alfriston Road, GU16 6QS	0	3	3
2015/0558	63 Deepcut Bridge Road	0	0	0
2015/0943	Land rear 27 Deepcut Bridge Road, GU16 6QX	1	0	1
2018/0520	111 Deepcut Bridge Road, GU16 6SD	0	2	2
2016/0609	27 FRIMLEY HIGH STREET, FRIMLEY, CAMBERLEY, GU16 7HJ	0	1	1
2016/0879	Land North West of 36-48 Frimley High Street, GU16 7JF	2	0	2
2015/0282	Garage Blocks Rear of 31-37 Stonehouse Rise, GU16 8DP	0	1	1
2019/0042	Unit 1 The Parade, GU16 7HY	0	1	1
2014/0330	91 WORSLEY ROAD, FRIMLEY, CAMBERLEY, GU16 9BB	2	0	2
2017/0822	1-3 Beaumaris Parade, GU16 8UR	0	4	4
2018/0895	111 Guildford Road, GU18 5RA	0	1	1
2017/0868	54 GUILDFORD ROAD, LIGHTWATER, GU18 5SD	1	0	1
2018/0527	Curley Croft, 8 Junction Road, GU18 5TQ	0	1	1
2014/0107	4 COLEFORD BRIDGE ROAD, MYTCHETT, CAMBERLEY, GU16 6DZ	1	1	2
2016/0220	Land east of 220 Mytchett Road	4	0	4
2014/0541	Pankhurst Farm Bagshot road, GU24 9QR	0	3	3
2017/0821	Land South of Beldam Bridge Road, GU24 8DN	4	0	4
2015/0375	Land Rear of Thurdon, Bear Cottage & Homeleigh Beldam Bridge Road, GU24 9LP	2	0	2
2016/1196	24 & 26 Benner Lane, GU24 9JQ	1	0	1
2018/0144	Land Adj to Inglenook, 67 Benner Lane, GU24 9JS	0	1	1
2016/1207	7 Broad Street, GU24 9NH	0	3	3
2015/0754	Windlemere Golf Club Windlesham Road, GU24 9QL	2	0	2

Planning Application no.	Site Address	Units Under Construction	Units Not Started	Units Not Started or Under Construction
2013/0391	4 Chertsey Road, GU20 6ET	1	0	1
2015/0128	Lavershot Cottage London Road, GU20 6LF	0	1	1
2017/1100	Monegue Pine Grove, GU20 6AW	0	1	1
2018/0348	Manor Farm Cottage Rye Grove	0	1	1
2015/0596	The cottage SCHOOL LANE, WINDLESHAM, GU20 6EY	0	1	1
2016/0031	Crofters Snows Ride, GU20 6LA	0	2	2
Total		59	119	178