

**North East Lincolnshire**

**Windfall Allowance  
Technical Paper**

**1 April 2018 to 31 March 2025**

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## Windfall allowance technical paper

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## Section 1 Introduction

- 1.0.1** This paper examines housing delivery trends on windfall sites between 2018 to 2025 in North East Lincolnshire and sets out an estimate of housing delivery likely to come forward over the plan period from this source. It will be used to inform a decision as to whether to propose a windfall allowance in the Council's housing trajectory. Any decision on the inclusion of a windfall allowance will be made through the plan making process.

**Section 2 Policy and guidance**

## 2.1 National policy context

- 2.1.1** Windfall sites are defined as a “site not specifically identified in the development plan”.<sup>1</sup> Using this definition, windfall sites in North East Lincolnshire are those that have come forward outside the local plan process. They have not been allocated in the local plan process, but have since gained planning permission. Windfall sites can make an important contribution towards the Borough’s housing land supply through delivering additional housing further to planned development opportunities.
- 2.1.2** The National Planning Policy Framework (NPPF) allow for incorporation of a windfall allowance in the predicted land supply for the Local Plan, where there is evidence that they will provide a reliable source of supply. In these circumstances an allowance can be included provided that there is regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.<sup>2</sup> It is further suggested that the Local Planning Authority should resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
- 2.1.3** There is no specific nationally prescribed methodology to calculate a windfall allowance. However, the NPPF and Planning Policy Guidance (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. Paragraph 73 of the NPPF encourages a mix of small and medium sites in a local planning authority’s land supply as they “are essential for Small and Medium Enterprise housebuilders to deliver new homes and are often built-out relatively quickly”. It is further stated in paragraph 73 that the Local Planning Authority should “support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”.<sup>3</sup>
- 2.1.4** The PPG states that a windfall allowance can be included in association with the identity of developable sites and broad locations in years six to fifteen of the plan period.<sup>4</sup>

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1 National Planning Policy Framework, Annex 2: Glossary, page 80.

2 National Planning Policy Framework, Identifying Land for Homes, paragraph 75, page 20.

3 National Planning Policy Framework, Identifying Land for Homes, paragraph 73, page 19.

4 Planning Practice Guidance, Housing and Economic Land Availability Assessment: Method – Stage 3: Windfall assessment (where justified), paragraph 023.

## 2.2 North East Lincolnshire Local Plan (2018)

**2.2.1** The North East Lincolnshire Local Plan (2013 to 2032) adopted in 2018 (the "Local Plan"), identified a small site windfall allowance of 1,073 homes to be delivered over the plan period 2013 to 2032. The justification for this allowance was set out in the North East Lincolnshire Windfall Allowance Technical Paper (2014), which provided evidence of:

- Average windfall delivery rates used to calculate the average yearly supply.
- Windfall developments on brownfield and greenfield sites and by Spatial Zone.
- The treatment of all extant minor consents on sites of nine units or less and their inclusion within the windfall allowance rather than forming a separate component of future supply.

**Section 3 Methodology**

- 3.0.1** The paper updates previous evidence through comprehensive review of past housing delivery (completions) on windfall sites in the period 1 April 2018 through to 31 March 2025 incorporating data from:
- Valuation Office Agency data on housing completions.
  - Strategic Housing Land Availability Assessment.
- 3.0.2** 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 Council's monitoring of housing completions and analysed against the Strategic Housing Land Availability Assessment to ensure that local plan housing allocations and duplications from existing housing stock were not included in the windfall figures.
- 3.0.3** The assessment focuses on a timeframe dating back to 2018/19 which coincides with the monitoring data that has been subject to detailed audit and review. This audit corrected errors and duplication within the dataset, enabling robust evidence to be gathered to inform the windfall allowance. The time period also relates to the years post adoption of the North East Lincolnshire Local Plan (2013 to 2032) in 2018. This seven year period utilises accurate data and is considered sufficient to establish an updated windfall position.
- 3.0.4** The analysis includes:
- A breakdown of windfall completions by major sites (ten or more), minor sites (between five to nine dwellings), and small minor (four dwellings or less).
  - The contribution of windfall site completions to the annual housing completions.
  - The distribution of windfall sites by Spatial Zone.
  - A breakdown of major (ten or more) and minor (between five to nine) completions on greenfield and brownfield sites.

**Section 4 Findings**

**4.0.1** Table 4.1 Windfall completions shows the total number of windfall completions in the Borough between 2018 and 2025 (by monitoring year). This shows a steady supply of windfall housing with an average completion rate of 120 dwellings. Of these an average of 43 dwellings are from major sites (ten or more units), 27 dwellings for minor sites (five to nine units) and 50 dwellings for small minor sites (under four units).

| Year                                                   | Major (ten units or more) | Minor (five to nine units) | Small minors (four units or less) | Total      |
|--------------------------------------------------------|---------------------------|----------------------------|-----------------------------------|------------|
| 2018 to 2019                                           | 36                        | 26                         | 42                                | 104        |
| 2019 to 2020                                           | 44                        | 51                         | 58                                | 153        |
| 2020 to 2021                                           | 43                        | 15                         | 30                                | 88         |
| 2021 to 2022                                           | 143                       | 23                         | 65                                | 231        |
| 2022 to 2023                                           | 10                        | 20                         | 54                                | 84         |
| 2023 to 2024                                           | 24                        | 37                         | 56                                | 117        |
| 2024 to 2025                                           | 1                         | 19                         | 42                                | 62         |
| <b>Total</b>                                           | <b>301</b>                | <b>191</b>                 | <b>347</b>                        | <b>839</b> |
| <b>Average windfall completions per year (rounded)</b> | <b>43</b>                 | <b>27</b>                  | <b>50</b>                         | <b>120</b> |

**Table 4.1 Windfall completions**

**4.0.2** Table 4.2 Contribution percentage of windfall to total housing completions below shows the percentage of housing completions each year delivered on windfall sites compared to gross housing completions. The results show that the Borough generated an average of 24% of completions from windfall sites.

| Year         | Gross housing completions | Proportion of <u>major</u> windf all sites of total completions (%) | Proportion of <u>minor</u> windf all sites of total completions (%) | Proportion of <u>small</u> <u>minor</u> windf all sites of total completions (%) | Proportion of all windfall sites of total completions (%) |
|--------------|---------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------|
| 2018 to 2019 | 420                       | 9%                                                                  | 6%                                                                  | 10%                                                                              | 25%                                                       |
| 2019 to 2020 | 388                       | 11%                                                                 | 13%                                                                 | 15%                                                                              | 39%                                                       |
| 2020 to 2021 | 463                       | 9%                                                                  | 3%                                                                  | 6%                                                                               | 18%                                                       |
| 2021 to 2022 | 658                       | 22%                                                                 | 3%                                                                  | 10%                                                                              | 35%                                                       |

| Year                   | Gross housing completions | Proportion of <u>major</u> windf all sites of total completions (%) | Proportion of <u>minor</u> windf all sites of total completions (%) | Proportion of <u>small</u> <u>minor</u> windf all sites of total completions (%) | Proportion of all windfall sites of total completions (%) |
|------------------------|---------------------------|---------------------------------------------------------------------|---------------------------------------------------------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------|
| 2022 to 2023           | 508                       | 2%                                                                  | 4%                                                                  | 11%                                                                              | 17%                                                       |
| 2023 to 2024           | 495                       | 5%                                                                  | 7%                                                                  | 11%                                                                              | 23%                                                       |
| 2024 to 2025           | 538                       | 0.2%                                                                | 4%                                                                  | 8%                                                                               | 12.2%                                                     |
| <b>Average rounded</b> | <b>469</b>                | <b>8%</b>                                                           | <b>6%</b>                                                           | <b>10%</b>                                                                       | <b>24%</b>                                                |

Table 4.2 Contribution percentage of windfall to total housing completions

| Year                   | Urban Area | Western and Southern Arc | Estuary Zone | Rural Area |
|------------------------|------------|--------------------------|--------------|------------|
| 2018 to 2019           | 66         | 30                       | 1            | 7          |
| 2019 to 2020           | 102        | 27                       | 17           | 7          |
| 2020 to 2021           | 33         | 28                       | 21           | 6          |
| 2021 to 2022           | 166        | 24                       | 28           | 13         |
| 2022 to 2023           | 54         | 16                       | 8            | 6          |
| 2023 to 2024           | 89         | 22                       | 0            | 6          |
| 2024 to 2025           | 38         | 11                       | 1            | 12         |
| <b>Average rounded</b> | <b>78</b>  | <b>23</b>                | <b>11</b>    | <b>8</b>   |

Table 4.3 Location of windfall completions by Spatial Zone

| Year         | Major brownfield           | Major greenfield | Minor brownfield | Minor greenfield | Total                             |
|--------------|----------------------------|------------------|------------------|------------------|-----------------------------------|
| 2018 to 2019 | 35                         | 0                | 17               | 7                | <b>59</b>                         |
| 2019 to 2020 | 43                         | 0                | 20               | 8                | <b>71</b>                         |
| 2020 to 2021 | 36                         | 7                | 7                | 2                | <b>52</b>                         |
| 2021 to 2022 | 126 (removed from average) | 6                | 12               | 2                | <b>146 (removed from average)</b> |

| Year                           | Major brownfield | Major greenfield | Minor brownfield | Minor greenfield | Total     |
|--------------------------------|------------------|------------------|------------------|------------------|-----------|
| 2022 to 2023                   | 3                | 7                | 11               | 4                | <b>25</b> |
| 2023 to 2024                   | 23               | 0                | 30               | 5                | <b>58</b> |
| 2024 to 2025                   | 0                | 1                | 18               | 1                | <b>20</b> |
| <b>Total rounded (average)</b> | <b>23</b>        | <b>3</b>         | <b>16</b>        | <b>4</b>         | <b>48</b> |

Table 4.4 Windfall completions on Brownfield and Greenfield sites

## Summary

- 4.0.3** Table 4.4 Windfall completions on Brownfield and Greenfield sites demonstrates a fluctuating windfall delivery on brownfield sites for majors. Although there is an average delivery of 23, there were only three major brownfield windfall completions in 2022 to 2023 and none in 2024 to 2025. There was a more consistent windfall delivery on minor brownfield sites. 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.<sup>5</sup>
- 4.0.4** In order to ensure that the predicted trend is realistic and reliable, it is important to consider how anomalies may affect the dataset. Delivering 126 brownfield units as part of major developments in 2021 to 2022 is a figure which is much larger than that of brownfield delivery on major sites in other years across the period. With that figure included, the delivery per year of brownfield units on major sites is 39. However, if we remove the anomalous result then the average per year is 23 units per year. Subsequently, to ensure the data is representative, the average per year has been amended to 23. The average brownfield delivery on minor sites remains 16 per year.
- 4.0.5** In terms of small minor sites (four units or less), there is minimal data available to monitor greenfield and brownfield completions and subsequently they have not been included within Table 4.4 Windfall completions on Brownfield and Greenfield sites. It is worth noting that some windfall completions were built on mixed land or land which was neither brownfield nor greenfield and, as such, they are also not included.

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<sup>5</sup> National Planning Policy Framework, Making Effective Use of Land, paragraph 124, page 36.

**Section 5 Future trends**

- 5.0.1** Due to its nature, windfall sites deliver varying amounts of housing year-on-year. However, the Council has used accurate and reasonable data regarding windfall completions over a seven-year period to calculate an average delivery per year which is representative of windfall delivery. Anomalous results have been removed to ensure predictions are representative when included in housing supply calculations.
- 5.0.2** 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 2018, there have been further changes to permitted development rights and the use class order with units falling under Commercial, Business and Service (Class E) that can now be converted into dwellings with prior approval.
- 5.0.3** There has been urban regeneration across Grimsby and Cleethorpes which is expected to continue. Therefore, it is anticipated that opportunities will arise during the plan period which have not been accounted for through the allocation process.

## **Section 6 Conclusions**

- 6.0.1** It is evident that delivery of windfall sites is an important source of supply within North East Lincolnshire. Windfall sites have contributed an average of 120 units per year between 2018 to 2025, this makes up 24% of North East Lincolnshire's gross housing completions.
- 6.0.2** The analysis shows a consistent delivery of windfall sites each year across all scales of development:
- There has been an average of 43 major windfall site completions per year, making up 8% of the gross housing completions.
  - In terms of minor windfall sites (five to nine units), the average number of units of this size developed per year is 27, six percent of gross housing completions.
  - Further, the analysis shows a consistent delivery of windfall completions on small minor sites (four units or less), with an average of 50 completions per year, making up 10% of the gross housing completions.
- 6.0.3** The Council is mindful that the majority of the supply in the first five years from major windfall sites will already enjoy planning permission at the base date of the projection period, for example it will be a commitment which has already been calculated and has been counted against the overall assessed need for housing and, if the site does not already enjoy planning permission, it is likely that it will be allocated.
- 6.0.4** Therefore, it is reasonable to exclude an allowance for major windfall sites in the first five years, because that will allow for the implementation of those commitments. Accordingly, the major site windfall allowance has only been included from year six to reflect the typical lead-in times for larger developments and to avoid double counting of commitments during the early years. Consequently, the first five years of the windfall supply will be based on minor and small minor windfall sites and will exclude major windfall sites.

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by North East Lincolnshire Council  
Municipal Offices  
Town Hall Square  
Grimsby  
North East Lincolnshire  
DN31 1HU