Warwick District

Local Plan

Estimating a Windfall Allowance:

Publication Stage

April 2014

1.0 Introduction

1.1 National Planning Policy Framework (March 2012) defines windfall sites as:

"Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available."

Paragraph 48 states that Local Planning Authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to:

- the SHLAA, and
- historic windfall delivery rates (not including garden land)

1.2 NPPF states that LPAs should identify a supply of developable sites (in a suitable location, with a reasonable prospect that it is available, and viable) or broad locations for growth for years 6-10 and, where possible, for years 11-15. NPPF does not specifically state that a windfall allowance can, or cannot, be included in the supply of land for years 6-10 or 11-15. However, it must follow that if a windfall allowance can be used in the rolling 5 year supply calculation, then it should be included in the overall supply.

2.0 Make-up of Housing Supply

2.1 The housing supply in the Local Plan is made up as follows:

- commitments (sites with planning permission or under construction)
- allocated sites adjacent to urban areas (urban extensions)
- allocated sites in sustainable village locations
- allocated sites on urban brownfield land
- SHLAA sites on urban brownfield land, and
- allowances for urban and rural windfall sites

2.2 The housing requirement is 12,860 between 2011 and 2029 (18 years) at an average annual rate of 714 dwellings per annum. The three phases are as follows:

Phase 1	Up to 2019
Phase 2	2019-2024
Phase 3	2024-2029

3.0 Methodology for Calculating the Windfall Allowance

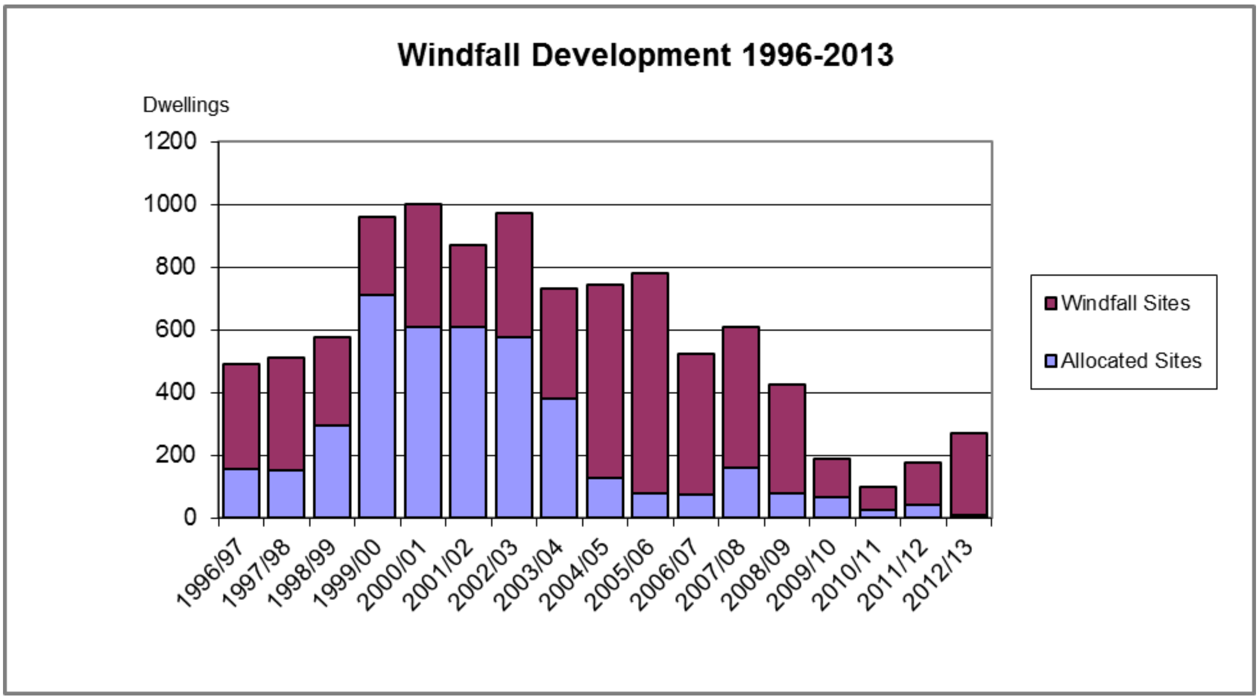
3.1 In calculating a realistic windfall allowance it is important to:

- Analyse past trends
- Avoid double counting with SHLAA sites
- Allow for changing market conditions
- Allow for changing trends
- Apply a discount for windfall sites coming forward within the plan period but which will be completed beyond the plan period

3.2 The methodology is based on the fact that each year new sites obtain planning permission for housing. The methodology examines the nature of the different types of sites which have emerged in the past and then forecasts whether such sites are likely to continue to emerge in the future. In doing so, it examines change of policy at national and local level, including changes to the General Permitted Development Order, as well as the likely availability of sites. However, since completions are a more realistic indication of permissions which are actually implemented, the sites analysis looks at completions rather than permissions. Thus, no discount for unimplemented permissions is required. However, a discount is applied to those sites which come forward towards the end of the plan period but are implemented beyond the plan period.

4.0 Windfall Development in Warwick District

4.1 Historically, windfall sites have played an important role in the supply of housing in the District. The following chart shows completions, on windfall and allocated sites, between 1996 and 2013.



4.2 The Table at Appendix 1 (Housing Completions 1996 – 2013) shows that the average annual number of windfall completions during this period was 340. The period includes two extremes of the housing market – a strong market with rising house prices during the period 1999 –2006 and a weak market with fairly static house prices during the period 2007-2012. During the period 2005 to 2009 the Council implemented a moratorium on new permissions for housing on windfall sites which artificially supressed supply. The purpose of this was to manage housing supply so that it did not significantly exceed the Regional Spatial Strategy's maximum housing requirement. Not to do so would have impacted on the ability of the Local Plan to be in conformity with the Regional Spatial Strategy.

4.3 An important feature of windfall development in Warwick District is that the delivery of homes on a previously-developed site usually takes place in a relatively short timescale between the vacancy of the site through to planning permission and development. This is because there is particularly high demand for housing land in the District and developers are quick to take up any opportunities that arise. There is normally a strong market for all types of housing such as flats for young people, (including students from Warwick University) homes for families and specialist housing for older people. The District has a strong private rented sector which adds to the diversity of housing types. Thus, most sites will be capable of playing a role in meeting housing need and demand.

4.4 In general, therefore, previously-developed sites which become vacant do not stay vacant for long periods of time and it is difficult, therefore, to identify such sites for housing with any certainty as few vacant brownfield sites exist at any one time. Most will come forward as windfalls as and when they become vacant. The windfall allowance, therefore, is a very important part of the District's housing supply. The impact of underestimating windfalls could lead to:

- much higher levels of housing development than the level for which infrastructure has been properly planned; and
- an adverse impact on the ability of neighbouring local authority areas to deliver housing to meet their needs.

4.5 Some examples of the relative speed with which developments come forward include the former Benfords and Pottertons sites in Warwick. Despite large site preparation costs (including a new river bridge in the case of Pottertons), these sites came forward relatively quickly as housing sites.

Analysis of the Different Types of Windfall Sites

4.6 A detailed analysis of the different types of windfall sites is carried out so that trends can be projected forward and double counting, with other categories of sites in the housing supply, can be prevented. In particular, we can ensure that no double counting takes place between SHLAA sites and the windfall allowance. The analysis looks in more detail at the following categories of sites:

1. Rural windfall sites. These are counted separately because the SHLAA only assesses the capacity of urban (or edge of urban) sites. Further, there has been a change in national policy for rural housing development so past trends are unlikely to continue.
2. Conversions and changes of use. This type of development has consistently come forward since 1996. Only a very few such sites appear in the SHLAA.
3. Redevelopment/ new build sites with a capacity of less than 5. The SHLAA does not include sites with a capacity of less than 5 dwellings.
4. Redevelopment/ new build sites with a capacity of 5 or more dwellings. These are included in the SHLAA but it is expected that a further supply will come forward beyond 2018

4.7 The following Table sets out the historic completions of dwellings by these specific categories of sites:

TABLE 1 PAST TRENDS HOUSING DELIVERY (NET) BY CATEGORIES OF WINDFALL SITES

Year	Rural Areas	Urban Areas		
		Conversions & Changes of Use	Redevelopment/ New Build (<5 Homes)	Redevelopment/ New Build (5+ Homes)
2002/03	40	52	8	100
2003/04	34	75	11	117
2004/05	26	133	16	173
2005/06	19	104	16	131
2006/07	19	67	19	100
2007/08	78	101	16	135
2008/09	29	29	3	53
2009/10	10	12	8	28
2010/11	5	15	5	22
2011/12	0	57	4	34
2012/13	7	33	2	150
Total	267	678	108	1043
Annual Average	24	62	10	95

Notes
Rural sites exclude King Edward VI hospital site at Hatton and student flats at Warwick University as these are untypical of rural windfall sites in the District.
Development on garden land is excluded

4.8 The greatest source of housing from windfall sites is from urban redevelopment sites of over 5 dwellings. In the years 2003-2006, a number of large and medium employment sites were vacated and redeveloped for flats. Large redevelopment schemes of existing dwellings were also popular in this period although these are not included here as they involved development on garden land. The Local Plan, which was adopted in September 2007, included policies which resisted the loss of employment land. The impact of this policy and the Housing Moratorium was to reduce the supply of windfall housing up until 2012. However, the year 2013/2014 has seen an increase in the number of redevelopment schemes coming forward as the housing market improves. These schemes include:

- former school sites
- other former public sector sites
- affordable housing schemes on former employment land (an exception to policies protecting employment land)

- site intensification schemes on brownfield land

4.9 Conversions and sub-divisions of existing buildings have, over the years, consistently made an important contribution to the supply of apartments in the District. This supply largely originates from:
- over-the-shop schemes in Warwick, Leamington Spa & Kenilworth town centres, but particularly in Leamington Spa where the Parade consists of imposing Regency and Victorian buildings of up to 4 stories ;
- larger Regency detached, terraced and semi-detached housing, particularly in Leamington Spa in areas around the town centre

4.10 In the years from 2006 to 2012, following the moratorium and the downturn in the economy, the densities of windfall development fell as the popularity of flats decreased. The last monitoring year, however, has seen an increase in the number of flats receiving planning permission. These have comprised accommodation for students[1] and for older people, as well as for general housing.

4.11 In rural areas, windfall development has been restricted in the past by planning policy. This is partly due to the Green Belt designation in most of the northern part of the District, but also by Structure Plan and Regional Spatial Strategy policy which restricted growth in the rural areas. Regional policy restricted growth to sustainable villages with a reasonable level of services and to the provision of homes to meet local needs only, as evidenced by a needs survey or assessment. Only five villages in the District have a reasonable level of services and so windfall development has, in the past, been particularly constrained and limited to barn conversions, limited infill development in certain villages only, conversions and rural exception sites.

5.0 Adjustments for Changing Market Conditions and Future Trends

Market Conditions

5.1 The period 2002 to 2013 includes a range of different market conditions from an extremely buoyant market in the period 2002 to 2007, to a

[1] Guidance from DCLG states that "all student accommodation can be included in the assessment of supply in local plans, regardless of whether it is communal or on or off campus". Notes and Definitions for the Housing Flows Reconciliation (HFR) Form. 2012. See also DCLG Definitions of general housing terms. 14 November 2012

downturn between 2007 and 2012. In addition, the Council had a moratorium on new housing permissions between 2005 and 2009. Therefore it is considered that no adjustments are necessary to allow for different market conditions.

Future Trends

Rural Areas

5.2 There has been little change in the *nature* of sites coming forward in the rural area over the past 11 years, albeit the numbers of dwellings have reduced since 2008/09. However in future policies for development in villages will be less restrictive, reflecting new advice in the NPPF which allows for:

- housing which will enhance or maintain the vitality of rural communities
- the re-use of some disused buildings in the open countryside;
- market housing as part of rural exception schemes
- limited infilling or the partial or complete redevelopment of previously-developed sites which would not have a greater impact on the openness of the Green Belt

5.3 The Draft Local Plan policies for housing development in rural areas, therefore, reflect general policy in NPPF and are less restrictive towards housing development.

5.4 The District contains six villages which have a reasonable level of services (a primary school, shop, community facility, place of worship and a reasonable bus service to the towns). There are also a number of smaller settlements with, say, one or two of the above services. None of the rural settlements are more than ten miles from a town. The adopted Local Plan policy excludes development in the smaller villages and allows development in the larger villages only where it meets a local need and is located on brownfield land. There are, therefore, opportunities for rural housing development to increase to levels above past trends. Small schemes of infill development may be possible in the smaller villages as this could support services in the larger villages. Infill development in the six larger villages will no longer depend upon meeting a local need for market or affordable housing. There will be increased opportunities to convert disused farm buildings in the open countryside and to redevelop, or provide infill development on, previously-developed sites in countryside. The increase in the affordable housing site size threshold from 3 to 5 in the Draft Local Plan will increase the viability of small schemes of less than 5 dwellings.

5.5 In addition, changes to the General Permitted Development Order in 2013 and 2014 allow changes of use in certain circumstances from offices to dwellings and from farm buildings (up to 140square metres) to housing. Between April 2013 and April 2014, 8 dwellings came forward in the rural area by way of a change of use from an office.

Urban Redevelopment Sites

5.6 In terms of large urban redevelopment sites (5 or more dwellings), changing trends can be identified in relation to the *nature* of sites coming forward and the nature of the housing development on those sites. There has been a noticeable absence of new, large (single user) employment sites coming forward in the last 5 years but a recent increase in the emergence of other sites such as:

- former public sector sites as the public services rationalise their property portfolios;
- small to medium commercial sites; and
- former public house sites.

5.7 The Council has entered into a 10 year Joint Venture agreement with Waterloo Housing in order to increase the supply of affordable housing. It is expected that this arrangement will lead to significant new development on sites which would not otherwise have come forward for housing development. Sites completed or in the pipeline since 2012 include:

Site	**Dwellings**
Edinburgh Crescent	11
Station Approach	220
Former Gas Works, Warwick	11
Former Fire Station, Warwick	11
Trinity Storage Queensway	72

5.8 The above Table gives an indication of the effectiveness of the Joint Venture in its ability to quickly bring forward difficult sites. This is possible by making effective use of sites in the ownership of the Council and releasing these using a deferred land payment and the ability to use New Homes Bonus in lieu of grant funding. Waterloo Housing, for its part, is able to bring forward its HCA Funding Programme.

5.9 Looking forward, the Council is now a self-financing housing authority and this will bring new freedoms to engage in building more Council homes. The Council is currently considering its options, but the intention is to deliver a significant quantity of new affordable homes. The revised Housing Revenue Account Business Plan (2012-13) projects that surpluses of some £729m could potentially build approximately 3,800 new homes over a period of 50 years. Some of these will be new homes on allocated sites whilst others will be on small windfall sites which become available.

5.10 In summary it is considered that sites of 5+ dwellings will continue to come forward as windfall sites, albeit the nature of the sites will be different from those which have emerged in the past. The sites are likely to include public sector sites which are surplus to requirement, unsuitable commercial and mixed use sites, public houses and Council owned land. The pro-active approaches of the Joint Venture and, moving forward, the District Council will help release sites which might not otherwise come forward.

5.11 The trend in relation to small redevelopment sites (<5 dwellings) is relatively constant. Although it is likely to decline in the future as development on garden land is resisted, this will not affect this particular exercise as development on garden land is excluded from consideration.

Conversions and Changes of Use

5.12 Conversion and change of use schemes continue to come forward at a constant rate. These include sub-divisions of larger Victorian and Regency properties, particularly in Leamington Spa; basement conversions; flats above shops and other changes of use from commercial buildings to residential uses. Converted properties play an important role in the private rented market, which is increasing in Warwick District as well as nationally.

5.13 Warwick District traditionally has a buoyant private rented market. In 2011, the proportion of homes which were privately rented was 17.9%, above the regional and national averages of 14% and 16.8% respectively.

Since 2001, there have been an additional 14,000 properties in the private rented sector in the District. This increase is largely driven by:

- a relatively young adult population and the demand from Warwick University students
- the constraints in accessing mortgage funding
- the constraints in public sector funding for affordable housing
- the ability of Leamington Spa's Victorian & Edwardian housing stock and town centre properties to lend themselves to sub-division

5.14 Short term changes to the General Permitted Development Order allow the change of use of offices to homes in certain circumstances. A year since its introduction in April 2013, 131 dwellings were granted permission by way of Prior Approval. Of these, 123 were located in the urban areas with the greatest number in Leamington Spa.

Employment Land and Sites

5.15 At the national policy level, NPPF supports changes of use from employment to residential, where appropriate. Paragraph 51 suggests that local planning authorities should:

"normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate."

5.16 The Draft Local Plan continues to protect existing, committed and allocated employment land where it plays an important role in meeting the employment needs of the District. Where sites become vacant, there may be circumstances where they can be released for housing such as where the site is no longer suitable or viable for employment uses or where the use has an unacceptable impact upon nearby residential areas. The Employment Land Review has identified some employment areas as experiencing higher than average levels of vacancies and poor quality buildings and these may be suitable for redevelopment for alternative uses. Although some of these areas are accounted for separately in the Draft Local Plan, it is likely that isolated employment uses within residential areas could continue to become available.

5.17 Temporary changes to the General Development Order in 2013 allow changes of use from office uses to residential uses without planning permission provided certain criteria are met. In the first 9 months of this change, about 90 new dwelling units have been the subject of a Prior

Approval application. This relaxation in permitted development rights will be in place until the end of May 2016. If current trends continue, this could lead to 120 new units a year or an additional 290 dwellings between 1st January 2014 and 31st May 2016.

Densities

5.18 Redevelopment schemes providing flats contributed to relatively high densities on brownfield land in the first decade of the century. Since the Moratorium and the "credit crunch" of 2007-2012, and the constraints in obtaining mortgages, the numbers of large developments of flats have diminished. However, in the last few years there has been a growing trend for student accommodation in the form of cluster flats and for retirement/ extra care accommodation. These include redevelopment schemes as well as changes of use. The densities of these developments are generally much higher than if the sites were developed for general housing. Both types of development largely take place on previously unidentified, brownfield sites.

Student Accommodation

5.19 South Leamington Spa has traditionally been a popular place of residence for students of the University of Warwick. Although most of the first year students are accommodated on the campus (which is located within both Coventry City and Warwick District) other students generally live off campus in shared houses or purpose built accommodation. About half of these students live in Leamington, primarily in shared houses. In recent years, however, there has been an increased trend for purpose built cluster flats. One large development of 47 flats, and a number of small to medium developments amounting to 21 flats, has been provided in the past five years. These are largely located in areas within and around Leamington town centre, either as part of redevelopment schemes or conversions of existing buildings. In addition, the University has an outline permission for two student accommodation blocks consisting of 226 cluster flats, one of which was completed in 2013.

5.20 The University has indicated that it intends to develop more such units in the future within Warwick District. The University has aspirations to grow and to maintain its position as one of the top Universities in the country. This will require the University to be able to attract foreign students and the provision of accommodation on the campus is essential in order to achieve this.

5.21 Warwickshire College also attracts a number of foreign students and has recently provided a block of 93 bedrooms on the campus. All these developments - in Leamington Spa, at the University and the College - are provided on windfall sites and Government Practice Guidance states that local planning authorities should count these developments towards the housing requirement, even where they consist of halls of residences on campus (see Appendix 2).

Accommodation for Older People

5.22 Developments of different types of accommodation for older people are expected to increase as people live longer. The emergence of different models of care, such as Extra Care and Continuing Care, now provide for an alternative to residential homes or living at home with care assistance. A number of different types of schemes have received permission in recent years and this is expected to continue. These include a total of 618 extra care or close care flats and 425 care bedrooms. These development sites largely include conversions of existing buildings or the redevelopment of sites in a variety of uses including employment, community and residential. The locations are largely urban locations in Warwick, Leamington, Whitnash and Kenilworth. These are all located on windfall sites and will count towards the housing requirement (see Appendix 2).

Summary of Likely Future Trends

5.23 In summary, whilst it is likely that the supply of housing from large single industrial users will decrease, along with higher densities for general housing, it is likely that the supply of other sites are likely to continue to grow. These sites include:

- rural sites including limited, village infill development sites in sustainable villages and feeder smaller villages; conversions of rural buildings; and limited redevelopment of existing rural brownfield sites,
- surplus public sector land and buildings (including Council-owned land),
- offices (for changes of use) up until May 2016,
- small to medium industrial and commercial buildings, and
- former public houses

Further, it is expected that there will continue to be demand for sites for developments of accommodation for students, both on and off campus, and for a variety of different models of accommodation for older people.

5.24 In order to allow for changes to the character of future windfall sites, it is proposed to:

- increase by 40% the allowance for rural windfalls, in relation to past trends, to allow for more relaxed planning policy and more settlement boundaries, where infill development can take place, and student accommodation on campus; and
- increase by 20% the allowance for conversions and changes of use to allow for more office conversions up to May 2016 and for increased demand for private rented accommodation, including student accommodation and accommodation for older people

With regard to redevelopments, it is acknowledged that large employment sites are less likely to come forward, however a number of medium sized sites in a variety of uses are likely to continue to come forward. As with conversions, these will also provide for specialist accommodation for older people and, to a lesser extent, students. It is therefore proposed to make no adjustment to redevelopment sites.

TABLE 2 ADJUSTMENTS TO TAKE ACCOUNT OF FUTURE TRENDS

Category of Windfall Site	**Adjustment**
Rural	+40%
Conversions & Changes of Use	+20%
Redevelopment/ New Build (<5 Dwellings)	None
Redevelopment/ New Build (5+ Dwellings)	None

6.0 Application of Windfall Estimates to Phases

6.1 Estimates of windfall development on rural sites, by way of conversions and changes of use, and on small redevelopment sites (<5 dwellings) will be allowed for in all phases of the plan period. This is because such sites are not accounted for in the SHLAA.

6.2 The majority of urban redevelopment sites (5+ dwellings) in the SHLAA are expected to come forward in the period prior to 2019. Few urban SHLAA sites are expected to come forward in the following ten year period (2019-2029). Since sites in the District are recycled relatively quickly (from becoming available to completion) it is likely that in the period to 2029 a number of new redevelopment sites will emerge.

6.3 It is proposed, therefore, not to include a windfall allowance for redevelopment windfall sites (5+ dwellings) in the first phase since many of the sites that come forward are already included in the SHLAA. However in the second and third phases a full allowance will be made for redevelopment sites (5+ dwellings) because it is likely that by then more sites will have emerged, beyond those identified in the current SHLAA.

TABLE 3 APPLICATION OF WINDFALL CATEGORIES TO PHASES

Phase	Category of Windfall Site			
	Rural Areas	Urban Areas		
		Conversions & Changes of Use	Redevelopment/ New Build (<5 Dwellings)	Redevelopment/ New Build (5+ Dwellings)
Up to 2019	✓	✓	✓	x
2019-2024	✓	✓	✓	✓
2024-2029	✓	✓	✓	✓

7.0 Apportioning an Adjusted Windfall Allowance to Phases

7.1 The calculation below gives an allowance for 2,902 new homes gaining permission on windfall sites between 2013 and 2029 (16 years) an annual average of 181 homes. This compares with 2,096 new homes on windfall sites in the 11 years between 2002 and 2013, an annual average of 191 dwellings. This period included 3.5 years of supressed supply during the Housing Moratorium.

TABLE 4 APPORTIONEMENT OF ADJUSTED WINDFALL ALLOWANCES TO PHASES

	Rural Sites	**Urban Sites**			**Total**
		Conversions & Changes of Use	**Redevelopment & New Build (<5 Homes)**	**Redevelopment & New Build (5+ Homes)**	
Annual Average (From Table 1)	24	66	9	95	193
Adjustment	+40%	+20%	None	None	
Adjusted Annual Average	34	79	9	95	217
Phase 1 2013-2019	204	474	54	0	732
Phase 2 2019-2024	170	395	45	475	1,085
Phase 3 2024-2029	170	395	45	475	1,085
All Phases	**544**	**1,264**	**144**	**950**	**2,902**

8.0 Discounting Permissions in Final Phase

8.1 The above allowances for new permissions each year are based on statistics about completions rather than new permissions because these are considered to be a more realistic reflection of the number of homes which will actually be delivered on windfall sites. Each year a certain proportion of permissions expire because they have not been started within the lifetime of the permission (usually 3 years). Thus completions data is a more realistic measure of new permissions likely to be granted and implemented.

8.2 New permissions for dwellings on windfall sites come forward each year and these are likely to be built out in the following 4/5 years depending on the start date and the size of the development. Towards the end of the plan period, new sites which come forward as windfall sites will be built outside the plan period. It is necessary, therefore, to discount the windfall allowance in the final phase to take this into account. The following Table illustrates this.

TABLE 5 DISCOUNTING WINDFALL ALLOWANCE IN FINAL PHASE

Year of Permission	Permissions (Dwellings)	Year Built					Total Built
		2024/25	2025/26	2026/27	2027/28	2028/29	2024-2029
2024/25	217	36	72	72	37	0	217
2025/26	217	0	36	72	72	37	217
2026/27	217	0	0	36	72	72	180
2027/28	217	0	0	0	36	72	108
2028/29	217	0	0	0	0	36	36
Total 2024 -2029	1085	38	107	178	214	214	758 (70%)

9.0 Conclusion

9.1 The following Table shows the results of a realistic assessment of the number of windfall sites likely to emerge and be built over the plan period, over and above sites already identified in the SHLAA and not including garden land development. The Table shows that it is estimated that 2,575 new homes could be delivered between 2013 and 2029, an annual average of 161 homes per annum. This compares with an annual average of 191 dwellings between 2002 and 2013 during a period which included 3.5 years of a Housing Moratorium.

TABLE 6 FINAL ADJUSTED WINDFALL ALLOWANCE

Phase	Number of Years	Annual Average	Total Windfall Allowance
Phase 1 2013- 2019	6	122	732
Phase 2 2019-2024	5	217	1,085
Phase 3 2024-2029	5	152	758
All Phases	16	161	2,575

APPENDIX 1

Housing Completions on Windfall Sites 1996 – 2013

Year	Total Dwellings	Dwellings on Windfall Sites		Dwellings on Allocated Sites	
		No	%	No	%
1996/97	490	332	67.8	158	32.2
1997/98	510	357	70.0	153	30.0
1998/99	575	279	48.5	296	51.5
1999/00	962	250	26.0	712	74.0
2000/01	1000	389	38.9	611	61.1
2001/02	872	262	30.0	610	70.0
2002/03	973	395	40.6	578	59.4
2003/04	733	354	48.3	379	51.7
2004/05	746	620	83.1	126	16.9
2005/06	782	704	90.0	78	10.0
2006/07	523	450	86.0	73	14.0
2007/08	608	448	73.7	160	26.3
2008/09	427	349	81.7	78	18.3
2009/10	188	120	63.8	68	36.2
2010/11	97	70	72.2	27	27.8
2011/12	176	135	76.7	41	23.3
2012/13	271	261	96.3	10	3.7
	9933	5775	58.1	4158	41.9

This table includes all windfall sites (including garden land).

Only self-contained student accommodation and specialist housing for older people is included.

APPENDIX 2

Counting Accommodation for Students and Older People

National Planning Practice Guidance sets out how local planning authorities should deal with housing for older people and student housing:

> Paragraph: 037Reference ID: 3-037-20140306
>
> **How should local planning authorities deal with housing for older people?**
>
> Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan.
>
> Revision date: 06 03 2014
>
> Paragraph: 038Reference ID: 3-038-20140306
>
> **How should local planning authorities deal with student housing?**
>
> All student accommodation, whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campus, can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Notwithstanding, local authorities should take steps to avoid double-counting.
>
> Revision date: 06 03 2014

In dealing with these matters, the Council supports a common approach with other authorities in the Housing Market Area, the sub-region and, if possible, the region. However at the time of publication of this document, no such common approach had been established, so the Council used a methodology which it considers is robust and realistic.

Students

In Warwick District there is a range of student accommodation. New accommodation for students generally takes the form of either:

- shared houses or flats in converted premises;
- cluster flats in purpose-built accommodation, on and off campus; or
- student bedrooms with shared facilities (akin to student halls of residences)

Traditionally the Council has applied the "self-containment" test in deciding whether or not to count accommodation. Thus, cluster flats and shared houses were counted as 1 unit (as they can be considered as self-contained units) but accommodation which is arranged more like a traditional halls of residence with a number of student bedrooms and shared catering facilities and lounges were not counted.

Since the publication of the new NPPG, the Council has adopted a slightly different approach. Self-contained units are still counted as 1 unit. However, traditional halls of residences are counted according to "the amount of accommodation it releases in the housing market". Based on the premise that most student accommodation in the District consists of shared houses in small Victorian terraced housing of between 3-5 students, the Council now assumes that one unit of accommodation is released for every 4 student bedrooms. Thus a halls of residence of 28 bedrooms would be counted as 7 units of accommodation.

Older People

New accommodation for older people in Warwick District generally takes the form of either:

- self-contained extra care accommodation;
- self-contained accommodation with varying levels of care or assistance;
- retirement "villages" with a range of accommodation with care including care bedrooms and self-contained accommodation; and
- care homes

Again, traditionally the Council has used the "self-containment test" in determining whether to count accommodation for older people. Thus, only those units which were fully self- contained were counted as a unit of accommodation. Where a unit only included very limited kitchen facilities (usually a hob and microwave but no oven or grill, because main meals would be taken in a central dining room), then these units were not counted.

The Council's new approach is to count all self-contained units, including those with limited kitchen facilities, as 1 unit. In terms of care bedrooms, a similar approach is taken to student bedrooms whereby the number of units counted is based on the number of units likely to be released in the market. An assumption is made that about two thirds of care bedrooms will release a house on the market. This is based on the assumption that in some cases a partner will remain living in the main home. Thus, for a care home of 100 bedrooms, 67 units of accommodation will be counted .