



Warwick District Local Plan

Estimating a Windfall Allowance:

June 2016

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 Local Planning Authorities may make allowance for windfall sites in the five year supply where compelling evidence on such sites;

- consistently becoming available in the local area
- continue to provide a reliable source of supply

Any windfall allowance should be realistic with regard to:

- the SHLAA
- historic windfall delivery rates (not including garden land)
- local circumstances that underpin past rates

1.2 The Council produced a Windfalls Paper (HO05) for the submission Local plan explaining the windfall trajectory expected over the lifetime of the Local Plan with regards the above. The inspector's initial findings (EXAM 23) accepted that windfalls are likely to continue to come forward in significant numbers. Given the nature of the District, past trends, and the scope of the SHLAA the inspector expressed satisfaction regards specific estimates on;

- Rural sites
- Conversions and changes of use
- Urban sites of less than five dwellings

1.3 However the local plan inspector expressed concerns over part of the allowance made and its impact on housing supply. The inspector was concerned over the scale of urban sites of more than 5 dwellings/its overlap with the SHLAA and potential for double counting in the first two years of the windfall trajectory. The inspector made the interim finding that there was no compelling evidence that windfall would provide a reliable source of housing supply on the scale envisaged.

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
- canalside and employment regeneration areas
- SHLAA sites on urban brownfield land, and
- allowances for urban and rural windfall sites

2.2 The housing requirement is 932 dwellings per annum between 2011 and 2029 (18 years) taking into account an historic shortfall of 2333 dwellings. The inspector found persistent under delivery triggering a 20% addition for the first five years giving a requirement of 8392 dwellings to 2022.

3.0 Methodology for Calculating the Windfall Allowance

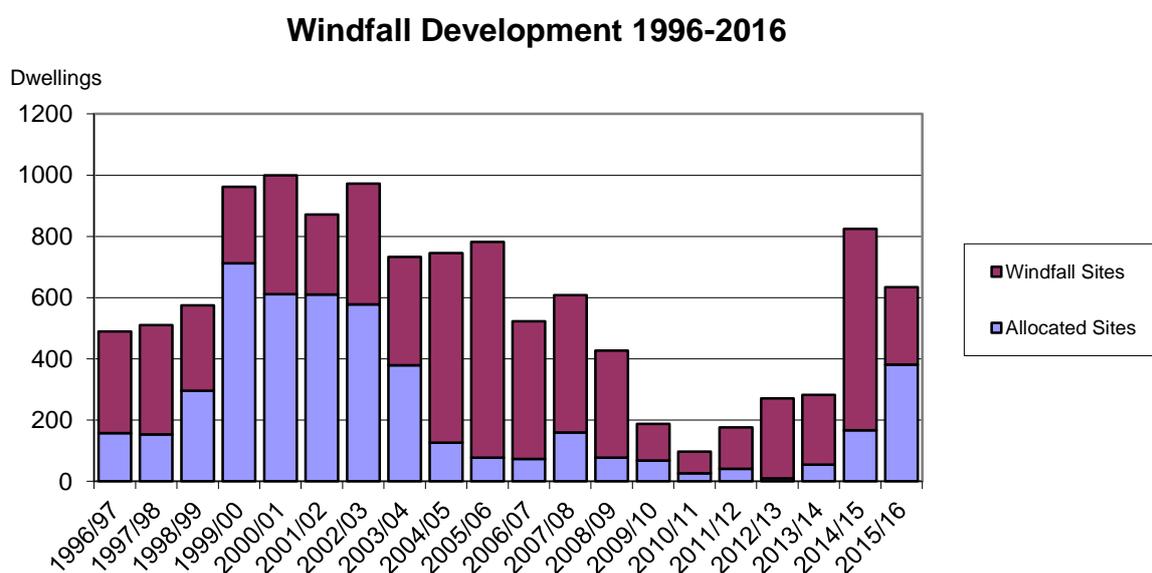
3.1 In calculating a realistic windfall allowance it is important to:

- Analyse past trends
- Avoid double counting with SHLAA sites/existing planning permissions
- Allow for changing market conditions
- Allow for changing trends

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. Since completions are a more realistic indication of implemented permissions the sites analysis looks at completions rather than permissions. Thus, no discount for unimplemented permissions is required. However, a discount is applied to sites coming forward in the first two years of windfall completions (reflecting time taken for windfalls to come forward to completion) to avoid double counting with existing planning permissions.

4.0 Windfall Development in Warwick District

4.1 The towns of Warwick, Royal Leamington Spa, Whitnash, and Kenilworth provide a substantial urban fabric and specific sources of windfall opportunities. The District also contains a large rural area with many villages that provide a further source for windfall. Historically, windfall sites have therefore 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 2016.



4.2 The Table at Appendix 1 (Housing Completions 1996 – 2016) shows that the average annual number of windfall completions during this period was 345. The period includes three distinct cycles of the housing market – a strong market with rising house prices during the period 1999 –2006, a weak market with fairly static house prices during the period 2007-2012 and an upturn from 2013. During the period 2005 to 2009 the Council implemented a moratorium on new permissions for housing on windfall sites which artificially suppressed 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 in order for the Local Plan to be in conformity with then extant and binding RSS. Since the abolition of RSS the Council has proposed new housing allocations in the emerging Local Plan.

- 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 the valuable 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 an important part of the District's housing supply.
- 4.5 Windfalls in the District therefore make an important contribution to NPPF 47 regards boosting significantly the supply of housing and providing sustainable development including;
- Make a timely contribution to supply through a range of site sizes
 - Smaller windfall sites in particular provide a rapid contribution to supply sometimes building out within a year of gaining permission
 - Recycle brown field land for housing
 - Choice of locations and house types including flats
 - Enhancing main town centres vitality through housing/mixed development increasing investment potential of those locations
 - Enhance heritage within historic towns providing beneficial use for assets
- 4.6 The government have introduced a series of measures to free up the contribution of windfalls to sustainable development. Alongside the Housing and Planning Act (2016), the DCLG Consultation (Dec 2015) proposes further changes to national planning policy with further potential flexibilities proposed including;
- Allowing higher housing densities around transport hubs
 - Explicit recognition and flexibilities for brownfield/smaller windfall sites
 - Emphasis on release of underused employment land
 - Starter homes in green-belt locations as rural exceptions via NPs

Equally there is a need for assumptions to be realistic in terms of delivery as examined below.

Analysis of the Different Types of Windfall Sites

- 4.7 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. Increasing source due to change in national policy on rural housing opportunities reflected in the emerging plan with significant further flexibility proposed by government.
 2. Conversions and changes of use. This type of development has consistently come forward since 1996. Relaxation of planning rules is leading to more proposals coming forward with further flexibilities proposed.
 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. The government propose specific recognition and flexibilities for smaller sites.
 4. Redevelopment/ new build sites with a capacity of 5 or more dwellings. The Council has updated its SHLAA in 2016. However it is possible that a further supply will come forward beyond 2022.
- 4.8 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
2013/14	44	38	9	147
2014/15	30	107	8	460
2015/16	55	97	15	86
Total	<u>396</u>	<u>920</u>	<u>140</u>	<u>1736</u>
Annual Average	<u>28</u>	<u>66</u>	<u>10</u>	<u>124</u>
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				
2014/15 Rural Area Excludes Quarry Farm (53 units) as this is untypical of the rural windfall sites in the District				
2014/15 Redevelopment category includes 178 unit retirement scheme at Land at Queensway				

- 4.9 The largest historic source of housing from windfall sites was 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 years 2013/14 -2015/16 has seen an increase in the number of redevelopment schemes coming forward as the housing market improves.

These schemes include:

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

4.10 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

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 few monitoring years, however, have seen an increase in the number of flats receiving planning permission. These have comprised accommodation for students¹ and for older people, as well as for general housing.

4.11 In rural areas, windfall development has in the past been heavily restricted by planning policies. This is partly due to the Green Belt designation in most of the District, but also by former Regional Spatial Strategy 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. In the RSS, only five villages in the District were identified as having 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. The end of RSS/more flexible approach in the NPPF, emerging local plan policies, and Permitted

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

Development in rural areas is likely to see an increase in the amount of rural windfall.

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, a downturn 2007 to 2012 and recovery from 2013. 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 The District has a large rural area and numerous villages albeit many in the green-belt and relatively sensitive to policy changes. There has been little change in the *nature* of sites coming forward in the rural area over the past 11 years. 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. Changes to the Permitted Development Order allow the conversion of farm buildings to residential use and shops to mixed use including two flats. Further flexibilities are proposed in the NPPF Consultation including the proposal to encourage sites of up to 10 dwellings outside/abutting development limits. The thrust of the consultation proposals are to create more opportunities for housing development in rural areas than currently exist.
- 5.4 The District contains ten 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 one or more 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 140 square metres) to housing. Between April 2013 and April 2014, 8 dwellings came forward in the rural area though a change of use from an office and a further 17 in 2014-15 and 14 in 2015-16.

Urban Redevelopment Sites

Large Urban Redevelopment Sites

- 5.6 Whilst the previous windfall Paper (H005) considered large urban redevelopment sites (5 or more dwellings) a major source of windfall, the inspector raised concerns over the reliability of this source especially with regard to overlaps with SHLAA sites. The Council put forward revised methodology with reduced numbers of windfall (Exam 20 and Note to inspector's further questions 22 May 2015). However the inspector noted (Exam 23) that the Council has a SHLAA and was concerned that the source for urban sites of more than 5 dwellings would overlap with the SHLAA that sought to identify these sites (para 34). The inspector concluded there was insufficient basis to suggest this source would deliver on the scale expected with any degree of certainty rejecting the windfall allowance in H005 as unjustified. As a result, the Council has updated its SHLAA during 2015/16, including carrying out a new call for sites. This has resulted in a number of new sites being identified. In this context, the Council accepts the inspector's view that windfall sites may not come

forward at the rate previously envisaged. Although it is likely that some windfalls in the category will continue to arise, the Council is now taking a cautious approach and has not included any estimate from large urban windfall sites within its windfalls assumptions.

Small urban redevelopment sites

5.11 The trend for small urban redevelopment sites (less than 5 dwellings) is relatively constant. Garden land is excluded from this source so protection of garden land will not impact on this source of windfall. This source is also included in the government's proposed presumption in favour of previously used sites and small windfall sites. The Council is now a self-financing housing authority bringing new freedoms to engage in building more 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 urban windfall sites which become available. The government's proposed presumption in favour of small urban windfall sites will further increase this source.

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

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- the ability of Leamington Spa's Victorian & Edwardian housing stock and town centre properties to lend themselves to sub-division

5.14 Changes to the General Permitted Development Order allow the change of use of offices to homes in certain circumstances. These changes have been extended to 2020. The source is also likely to benefit from PD changes that allow retail to mixed development/up to 2 flats the presence of town centres in the District. A year since its introduction in April 2013, 131 dwellings were permitted through Prior Approval. Of these, 123 were located in the urban areas with the greatest number in Leamington Spa. The government also propose a presumption in favour of previously used sites that is likely to bring more of this source forward.

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 (see Canalside and Consolidated Employment Land estimates), it is likely that isolated employment uses within residential areas could continue to become available after 2020.

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, with a further block recently gaining permission. 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 and shops (for changes of use) up until 2020,
- 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, 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 and take account of likely delivery, it is proposed to:

- Increase by 5% 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 relaxed PD rights/prior approval regime
- Decrease by 5% the allowance for conversions and changes of use to allow for any uncertainty while taking account of more office conversions up to May 2020 and for increased demand for private

rented accommodation, including student accommodation and accommodation for older people

- Decrease by 10% the allowance for small urban redevelopment & New build to allow for any uncertainty
- Decrease by 100% the allowance for large urban redevelopment & new build to avoid double counting with SHLAA sites

The above is summarised in Table 2 below. 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.

TABLE 2 ADJUSTMENTS TO TAKE ACCOUNT OF FUTURE TRENDS

Category of Windfall Site	Adjustment
Rural	+5%
Conversions & Changes of Use	-5%
Redevelopment/ New Build (<5 Dwellings)	-10%
Redevelopment/ New Build (5+ Dwellings)	-100%

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. These sites are not accounted for in the SHLAA, including many smaller sites, are recycled relatively quickly enabling a contribution to the five year supply.
- 6.2 The majority of urban redevelopment sites (5+ dwellings) in the SHLAA are expected to come forward in the period following 2020. However the inspector expressed concern over the inclusion of this source and overreliance on windfall when the opportunity exists to allocate such sites. The inspector further found persistent under delivery and emphasised the need to plan for a robust five year land supply. Not including this source provides a significant precaution regards meeting supply and provision of a robust five year supply.

- 6.3 It is proposed, therefore, not to include a windfall allowance for redevelopment windfall sites (5+ dwellings) since many of the sites that come forward are already included in the 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 2022	✓	✓	✓	X
2022-2029	✓	✓	✓	X

7.0 Adjusted Windfall Allowance

- 7.1 The calculation below gives an allowance for 1,179 new homes gaining permission on windfall sites/annual average of 98.25 homes over the plan period (2017 to 2029). These are based on the adjustments above notably full discount of large urban redevelopment sites (Table 4) No allowance is made for the period until 2019/20 to avoid duplication with existing commitments (see Table 5).

TABLE 4 APPORTIONEMENT OF ADJUSTED WINDFALL ALLOWANCES 2017-2029

	Rural Sites	Urban Sites			Total
		Conversions & Changes of Use	Redevelopment & New Build (<5 Homes)	Redevelopment & New Build (5+ Homes)	
Annual Average (From Table 1)	28	66	10	124	
Adjustment	5%	-5%	-10%	-100%	
Adjusted Annual Average	26.6	62.7	9	None	
Total	319	752	108	None	1179

Discounting Completions in First Phase

- 7.2 The above allowances for new windfalls are based on long-term built out trends for sites. However the inspector raised concerns over including windfalls in the first two years given overlap with permissions already counted as commitments.
- 7.3 Smaller sites that comprise the majority of the windfall are built out relatively quickly. Current trends show build out on average for windfall within 3 years. However given the inspector's concerns regards double counting with permissions a precautionary approach is taken by excluding windfalls for 2017/18 – 2018/19. Furthermore, the submitted housing trajectory's estimate for completions for the final year prior to adoption (2016/17), does not include an estimate for windfalls. So in effect there is no windfall allowance for three years.

TABLE 5 DISCOUNTING WINDFALL ALLOWANCE IN FIRST PHASE

	Windfalls
17/18	0
18/19	0
19/20	98.25
20/21	98.25
21/22	98.25
Total	294.75

Conclusion

9.1 Table 6 below shows the results of a realistic assessment of the number of windfall sites likely to emerge and be built over the plan period. This is over and above sites already identified in the SHLAA and not including garden land development. The sources identified consistently become available in the District and will continue to provide a reliable source of supply. The allowance fully discounts windfalls between 2017-19. No allowance for urban sites of 5+ dwellings is made due to risk of overlap with SHLAA sites and uncertainty over delivery. Table 6 shows that it is estimated that 982 new homes could be delivered between 2017 and 2029 compared with 2,575 (for the period 2015 – 2029) in H005 reducing uncertainties over delivery and adding flexibility to housing supply.

TABLE 6 FINAL ADJUSTED WINDFALL ALLOWANCE

Phase	Number of Years	Annual Average	Total Windfall Allowance
Phase 1 2019-2022	3	98.25	294.75
Phase 2 2022-2029	7	94.5	850.5
Plan period 2017-29	12	81.8	982.5

APPENDIX 1

Housing Completions on Windfall Sites 1996 – 2016

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
2013/14	283	228	80.6	55	19.4
2014/15	825	658	79.8	167	20.2
2015/16	634	253	39.1	381	60.9
	<u>11675</u>	<u>6914</u>	<u>59.22%</u>	<u>4761</u>	<u>40.78%</u>

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

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