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Wealden District Comprehensive Site Review

Final Report

Iceni Projects Limited and Urban
Intelligence on behalf of Wealden
District Council

September 2026

ICENI PROJECTS
LIMITED AND URBAN
INTELLIGENCE ON
BEHALF OF WEALDEN
DISTRICT COUNCIL

Iceni Projects

Birmingham: The Colmore Building, 20 Colmore Circus Queensway, Birmingham B4 6AT

Edinburgh: 7 Alva Street, Edinburgh, EH2 4PH

Glasgow: 177 West George Street, Glasgow, G2 2LB

London: Da Vinci House, 44 Saffron Hill, London, EC1N 8FH

Manchester: WeWork, Dalton Place, 29 John Dalton Street, Manchester, M26FW

t: 020 3640 8508 | w: iceniprojects.com | e: mail@iceniprojects.com

linkedin: [linkedin.com/company/iceni-projects](https://www.linkedin.com/company/iceni-projects) | twitter: [@iceniprojects](https://twitter.com/iceniprojects)

Wealden District Comprehensive Site
Review
FINAL REPORT

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1. Introduction

- 1.1 Iceni Projects (“IP”) and Urban Intelligence (“UI”) were appointed by Wealden District Council (“the Council”) to undertake a Comprehensive Site Review.
- 1.2 The purpose of the exercise is to provide a comprehensive review of potential developable sites in the district, including through the identification of new sites and broad locations that subsequently arise as new opportunities for development.
- 1.3 The document also assesses potential opportunities to deliver more development within the district through increased densities, the amalgamation of sites and considering the ‘deliverability’ of sites.
- 1.4 We also provide commentary on potential other mechanisms to help support increased capacity and the delivery of housing.
- 1.5 This information will be used to assess further and identify sites to accommodate the authority’s housing requirements at least up to 2042.

Background

- 1.6 WDC has already undertaken both an Urban Capacity Study¹ and a Character and Density Study² that were published alongside the draft Wealden Local Plan (Regulation 18) in March 2024.
- 1.7 This commission builds upon these studies by identifying additional sites to those already identified in the SHELAA (Strategic Housing and Employment Land Availability Assessment) as ‘suitable’.

Study Area

- 1.8 The study area for this commission is defined by the Wealden District Council administrative boundary (i.e. outside the South Downs National Park (SDNP) for planning purposes).
- 1.9 The district has five main towns – Hailsham, Crowborough, Uckfield, Heathfield and Polegate – although no one town dominates the district. Parts of the district adjoin the large regional settlements of Royal Tunbridge Wells and Eastbourne.
- 1.10 The district is an attractive place to live and offers a high quality of life to its residents. It is predominantly rural in character and covers a total area of 322.4 sq mi (835 km²).
- 1.11 The district's countryside stretches from the SDNP in the south to the High Weald National Landscape in the north; as such, it has some very strong environmental constraints.

¹[Wealden Urban Capacity Study, March 2024](#)

²[Wealden Character and Density Study, March 2024](#)

2. Site Identification

- 2.1 This section of the report sets out the approach and findings of the site assessment stage of the Comprehensive Site Review.
- 2.2 As set out earlier in this study, it is not intended to examine all potential housing sites in the district, only to identify and assess sites which have not previously been examined through the SHELAA and only those outside of the SDNP.

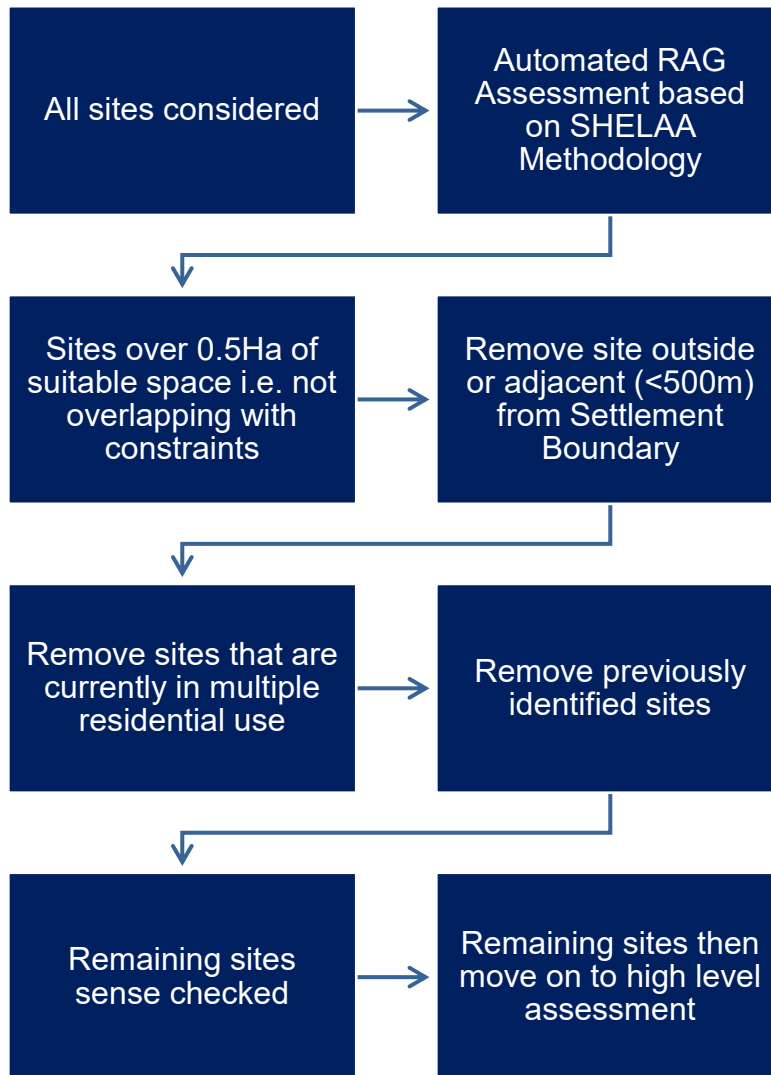
Figure 2.1 Area of Search



Source: Iceni Projects based on OS Data

- 2.3 The flow chart illustrates the process to identify a long list of sites capable of developing residential uses. The starting point was all 87,359 parcels of land in the district registered with the Land Registry, including those within the National Park.

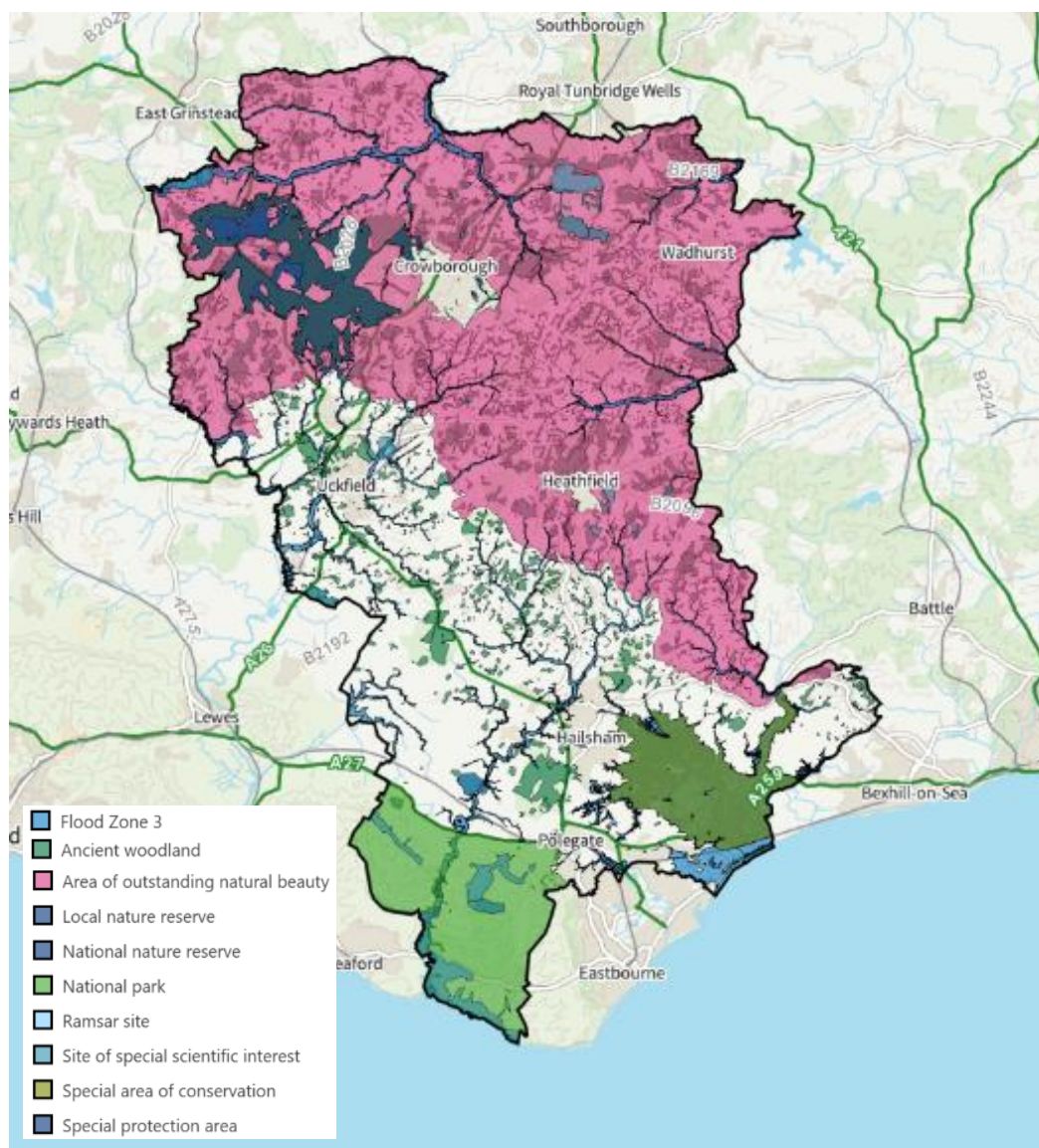
Figure 2.2 Flow Chart of Site Identification and Assessment Process



Source: Iceni Projects

- 2.4 We then applied a series of factual and qualitative functions to come to a list of sites for more detailed site assessment.
- 2.5 The first step was to replicate the site assessment methodology for the SHELAA. This ensured consistency between the two strands of work. This automated process examined all 87,000 sites against environmental, heritage, and other constraints (see below) and summarised them using an RAG rating system.

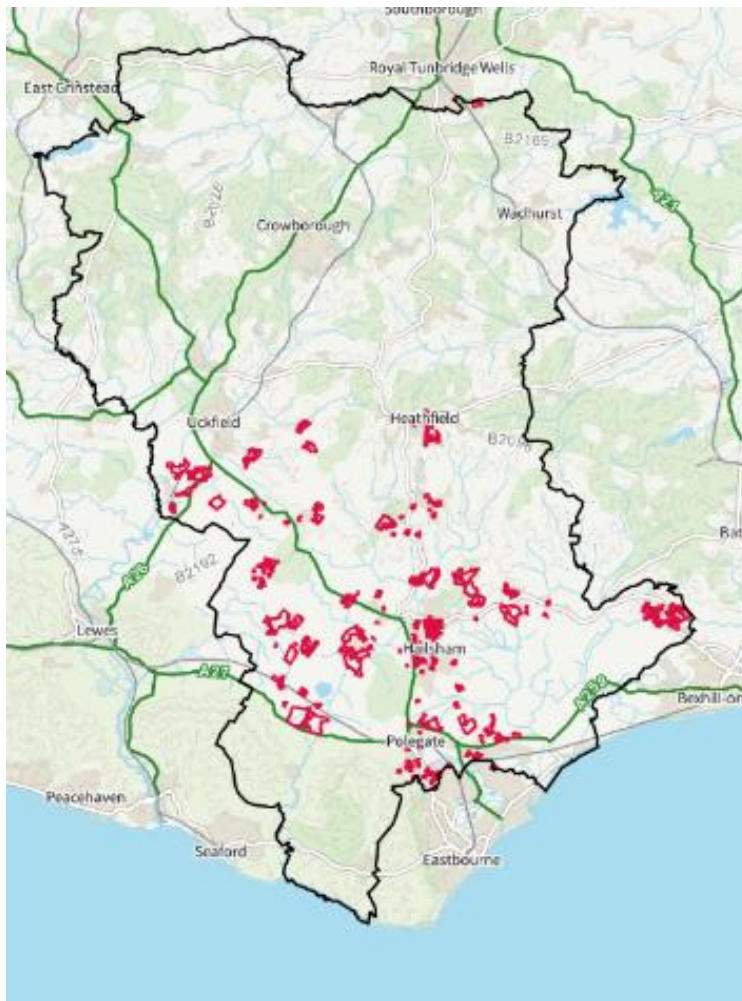
Figure 2.3 Constraint Mapping



Source: Iceni Projects based on OS Data

- 2.6 Only those sites which had a “Green” rating were taken forward for further consideration. These sites numbered around 28,000.
- 2.7 The next element of the work was to set several filters for these sites. These were done concurrently using Urban Intelligence's Placemaker Tool.
- 2.8 The first filter took out those parcels of land which were less than 0.5Ha. This does not mean smaller sites would not come forward; rather, they would be treated as windfall development.
- 2.9 The third filter removed any sites which were not within the Settlement boundary or a 500m buffer around the boundary. This ensured that any site was sustainable and connected to existing infrastructure.

Figure 2.4 Interim Initial Site Identification



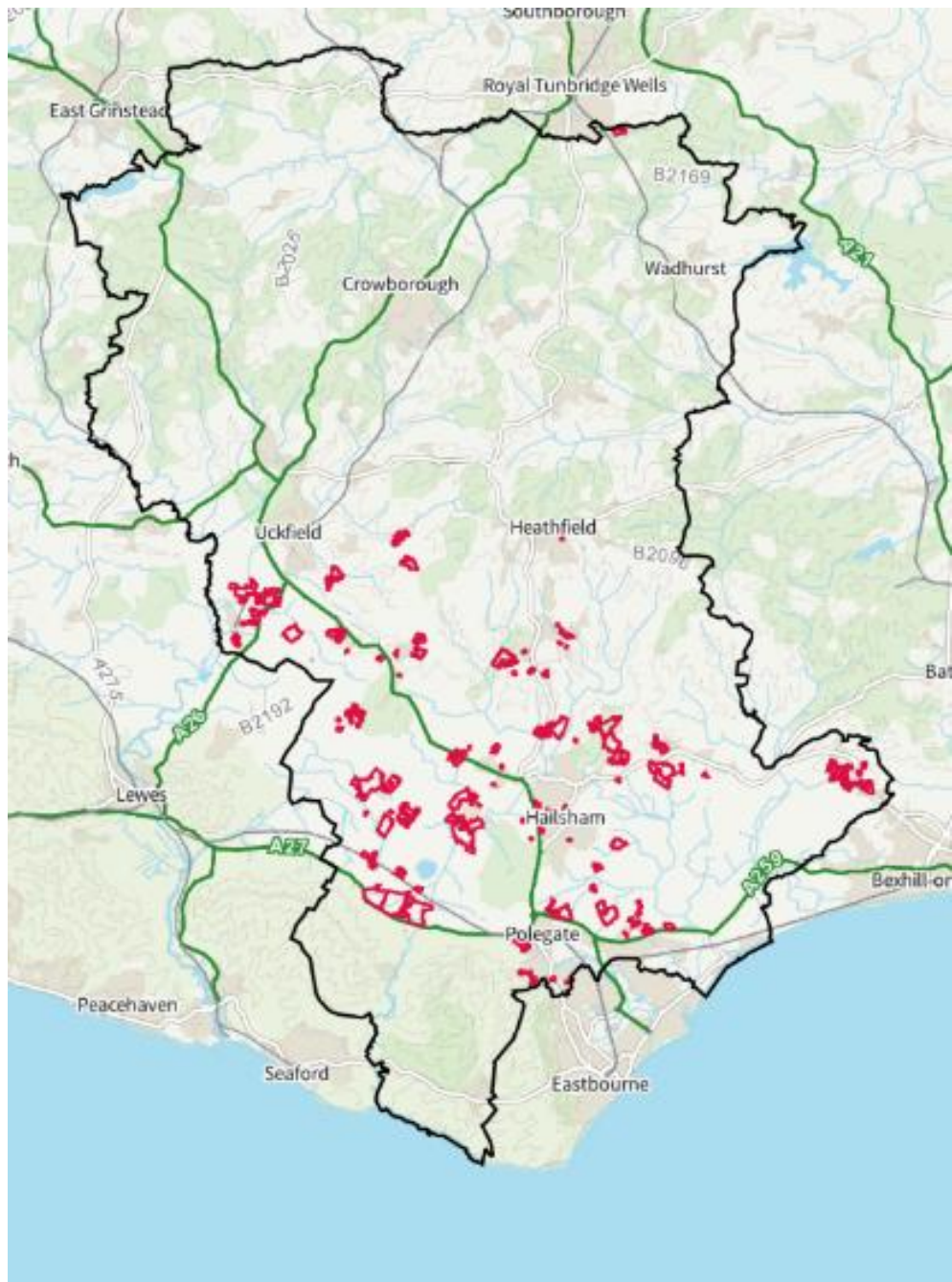
Source: Icenis Projects based on OS Data

- 2.10 The next filter excluded those sites which had more than one residential address or employment address within them. This ensured that any additional sites provided a net gain in residential terms and were realistic candidate sites.
- 2.11 The final filter removed any site that was previously included within the SHELAA. This removed double counting from the Council's current SHELAA assessment.
- 2.12 Furthermore, the purpose of this study was not to test previous findings but to identify further capacity. This left 331 sites, which required a further sense check.

Sense Check

- 2.13 The identified 331 sites include sites such as road parcels or unrealistic strips of land, which, although technically larger than 0.5 ha, were linear in shape and not conducive to development.
- 2.14 We therefore went through a manual process of examining and high-level evaluating each of the sites. Through this process, we also excluded sites on the grounds that they were:
- An unsuitable shape;
 - Had no obvious road access; or
 - Hosted infrastructure, e.g. schools.
- 2.15 The remaining 232 sites were then taken forward for further secondary filtering.

Figure 2.5 Final Initial Site Identification



Source: Iceni Projects based on OS Data

Secondary Site Filtering

- 2.16 The secondary site filtering was a more in-depth look at each site with specific reference to current use, access, ownership and relationship to the existing settlements.

- 2.17 In relation to current use, some sites that were in community use were removed from consideration. This included Cricket Pitches and Youth Centres. While these sites could come forward in the future, there was no evidence that this was likely and that their current use was redundant.
- 2.18 Furthermore, such sites typically come forward through a review of the Council's playing pitch strategy or a rationalisation of public sector land.
- 2.19 On closer examination, the sites included several larger homes and gardens. Typically, these homes occupied large plots and therefore had only a single residential address.
- 2.20 On access, the principal concern was whether the site was adjacent to a suitable road. Again, this was a high-level review that excluded sites with no road access or those accessible only via country tracks. This ensured that any site we identified was accessible and excluded 'island sites' not connected to the wider road network.
- 2.21 There were very few sites which were excluded on the basis of ownership. This included a small number of sites that were owned by parish councils. While these sites may still come forward, they would most likely be treated as a windfall development.
- 2.22 The final secondary filter relates to the site's relationship with existing settlements. While the initial filter included any site within 500m of the settlement boundaries, this was intended to ensure that urban extensions were not excluded for being outside the settlement boundaries.

- 2.23 However, the process also meant that sites which were entirely disconnected from the settlement boundaries were included. Such sites lacked the connectivity or facilities for sustainable development and were therefore excluded. The previous NPPF (paragraph 84) picks up this issue, stating that “Planning policies and decisions should avoid the development of isolated homes in the countryside.” However, there are exceptions to this rule.
- 2.24 This left only 20 sites, which were examined in more detail, as set out in the following chapter.

3. Detailed Site Assessment

- 3.1 Once the long list of sites was established, Iceni and Urban Intelligence, using GIS, examined each site in further detail. This included examining the site's planning history and any marketing, indicating the owner's willingness to consider the site for residential use. The pro formas below set out this information for each site.

Site ID: 84014

Address: Staverton Nursery Ltd, Staverton Nursery, Eastbourne Road, Halland, BN8 6PU

Ward: Chiddingly, East Hoathly & Waldron



Overall Site Area	2.15 ha
Current Use	Commercial/Retail
Ownership	Staverton Nursery Limited

Constraints	None
Suitable Site Area	2.15 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years (likely longer if continuing to be operational)

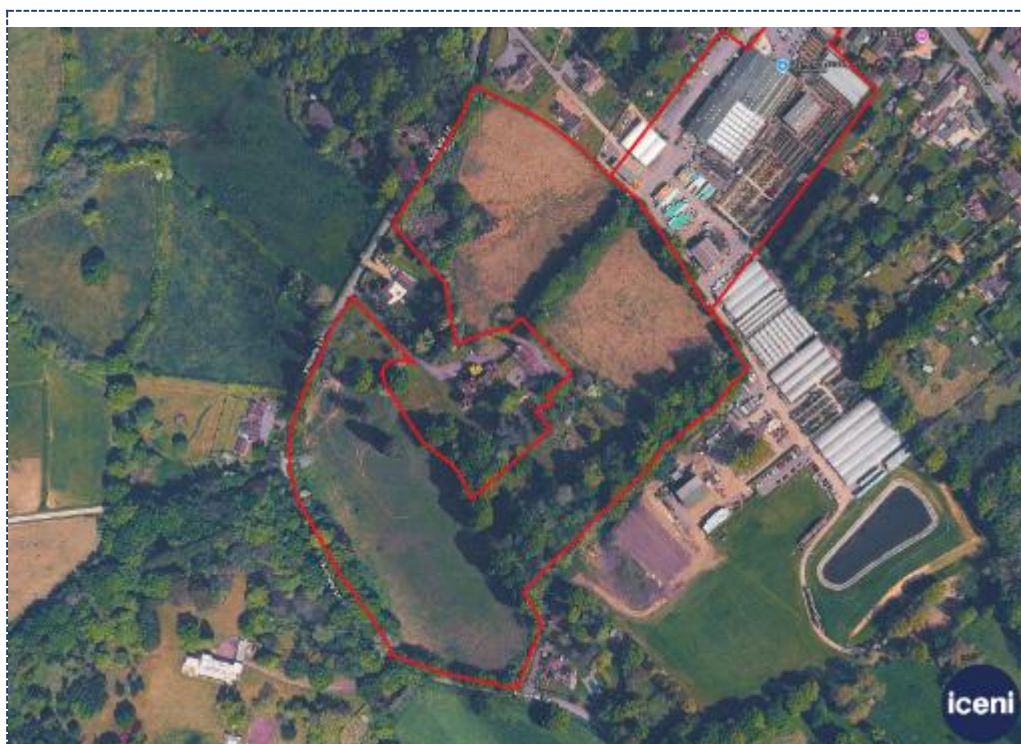
- 3.2 The site comprises Staverton Nursery, an established, fully operational commercial nursery operation, including a cafe, located within the settlement boundary of Halland.
- 3.3 The site is in single private ownership and benefits from existing road access, reflecting its long-standing commercial use. As a developed site containing nursery-related buildings and infrastructure, it may present opportunities for redevelopment or intensification, subject to consideration of the existing business operation.
- 3.4 Planning permission was granted in 2015 (Reference: WD/2015/0610/MAJ) for the relocation of the shop and glasshouse, together with an extension to the car park and the removal of several existing buildings and structures. It is unclear if this consent has been implemented.
- 3.5 The site is located in Halland and lies immediately to the northeast of another identified site (Site ID 863, which is examined next). As a result, there may be opportunities to consider the relationship between the two sites in any future assessment of development potential.
- 3.6 Depending on the nature of any future proposals, a coordinated approach could provide opportunities to maximise site efficiency, improve connectivity and secure a more comprehensive form of development.

- 3.7 Overall, the site benefits from several positive characteristics, including its location within the settlement (albeit the village of Halland is not considered a sustainable settlement in the Council's emerging Local Plan), established road access, single ownership and existing developed nature.
- 3.8 However, any future proposals would need to consider the site's ongoing commercial function, the implications of any loss of employment-generating uses, and the relationship with neighbouring land to ensure that development would represent the most appropriate and sustainable use of the site.

Site ID: 863

Address: Land South of Knowle Lane, Halland, BN8 6PR

Ward: Chiddingly, East Hoathly & Waldron



Overall Site Area	6.49 ha
Current Use	Mixed Use

Ownership	Private
Constraints	Priority Habitats
Suitable Site Area	6.49 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	10 – 15 Years (likely longer if continuing to be operational)

- 3.9 The site comprises agricultural land that is under single private ownership, which would simplify land assembly and delivery considerations.
- 3.10 The site (site ID: 84014) is adjacent to the site above and would act as a natural extension and would likely be brought forward together.
- 3.11 It is located on the edge of Halland and is accessed from the A22 via a country lane. Whilst the site benefits from a direct connection to the wider highway network, the existing access may require improvement to accommodate development and ensure that appropriate highway standards are met. This may be through the existing nursery.
- 3.12 The site is affected by the presence of priority habitat and ancient woodland. Any future proposals would need to demonstrate that impacts on these environmental assets can be appropriately mitigated in accordance with local and national planning policy.
- 3.13 The wider area has a history of planning appeals being dismissed on sustainability grounds, reflecting concerns regarding the accessibility of services, facilities and public transport. The village of Halland is not considered a sustainable settlement in the Council's emerging Local Plan.

- 3.14 This suggests that the sustainability credentials of any future development proposal will require robust justification and may represent a key planning consideration.
- 3.15 No planning applications have been submitted for the site itself. However, a planning application relating to the central area (reference WD/2025/2503/F) sought permission for the change of use of an existing annex building to a self-contained residential dwelling for the purpose of subletting.
- 3.16 The application was refused in 2025, with the principal reason for refusal being that the site was considered to be in an unsustainable location for residential development. An appeal against this decision has been lodged, although at the time of writing, no decision has been issued.

Site ID: 3241

Address: Land North of Knowle Lane, Halland, BN8 6PR

Ward: Chiddingly, East Hoathly & Waldron



Overall Site Area	0.82 ha
Current Use	Mixed Use
Ownership	Private
Constraints	Priority Habitats
Suitable Site Area	0.82 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 – 10 Years

- 3.17 The site comprises agricultural land that is under single private ownership, which would simplify land assembly and delivery considerations.
- 3.18 It is located on the edge of Halland and is accessed from the A22 via a country lane. Whilst the site benefits from a direct connection to the wider highway network, the existing access may require improvement to accommodate development and to ensure that appropriate highway standards are met.
- 3.19 The site is affected by the presence of priority habitat and ancient woodland. Any future proposals would need to demonstrate that impacts on these environmental assets can be appropriately mitigated in accordance with local and national planning policy.
- 3.20 The wider area has a history of planning appeals being dismissed on sustainability grounds, reflecting concerns regarding the accessibility of services, facilities and public transport. The village of Halland is not

considered a sustainable settlement in the Council's emerging Local Plan.

- 3.21 This suggests that the sustainability credentials of any future development proposal will require robust justification and may represent a key planning consideration.
- 3.22 There is no known planning history associated with the site itself. However, planning decisions in the surrounding area provide some indication of the challenges that may be encountered.
- 3.23 Most notably, application WD/2025/2503/F, which sought the change of use of an existing annex building to a self-contained residential dwelling for subletting, was refused on the basis that the location was considered unsustainable for residential development.

Site ID: 4713

Address: Land East of Bexhill Road, Ninfield

Ward: Herstmonceux & Pevensey Levels



Overall Site Area	0.99 ha
Current Use	Mixed Use
Ownership	Private
Constraints	None
Suitable Site Area	0.99 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.24 The site comprises agricultural land in a single private ownership and is located adjacent to the village of Ninfield, providing a logical physical relationship with the built-up area.
- 3.25 There is an additional site directly adjacent (Site ID: 18686) which sits between the site and the proposed development boundary of Ninfield. Given the sites' proximity and relationship to one another, it would be logical to present them as a comprehensive development opportunity rather than as separate schemes.
- 3.26 Further engagement with the landowners would be beneficial to establish whether the sites are under a single ownership but held under separate land registry titles, or whether they are in the control of different owners. This would help to clarify the potential for coordinated development and the likely deliverability of the sites.
- 3.27 A key consideration for the site is access. The site is currently accessed via a track road and contains several agricultural buildings. The

suitability of the track road to accommodate residential or mixed-use development is uncertain and may require improvement works.

- 3.28 Matters such as highway capacity, visibility, road width and the ability to accommodate increased traffic movements would need to be assessed in detail through any future planning application process.
- 3.29 There is no known planning history associated with the site. As a result, no recent planning precedent indicates the local planning authority's position on the principle of development at this location.
- 3.30 Overall, the site's location adjacent to the settlement and its single ownership may represent positive attributes from a development perspective.
- 3.31 However, further work would be required to establish the suitability and capacity of the existing access arrangements, as well as any constraints arising from the continued presence of agricultural buildings and the operational requirements of the surrounding rural area.
- 3.32 Additionally, its future development potential is likely to be closely linked to the adjoining site, with a comprehensive and coordinated approach likely to represent the most effective means of bringing the land forward for development.

Site ID: 5777**Address:** Land south of Chestnut Lodge, West End**Ward:** Herstmonceux & Pevensey Levels

Overall Site Area	5.99 ha
Current Use	Mixed Use
Ownership	Private
Constraints	Priority Habitats
Suitable Site Area	0.99 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 to 10 years

- 3.33 The site comprises agricultural land in a single private ownership and is located adjacent to Herstmonceux, providing a strong physical relationship with the built-up area.
- 3.34 The site benefits from access via the existing road network, which would support its development potential. However, junction improvements would be required if access through the adjacent weather station is not possible.
- 3.35 A key constraint affecting the site is the presence of ancient woodland within part of the site area. This would require retaining woodland areas and providing appropriate buffer zones (which we have not accounted for).
- 3.36 As a result, any future proposals would need to demonstrate that impacts on the ancient woodland have been mitigated in accordance with national and local planning policy.
- 3.37 There is no known planning history associated with the site. As a result, no recent planning precedent indicates the local planning authority's position on the principle of development at this location.
- 3.38 Overall, the site's position adjacent to Herstmonceux and its single ownership are positive characteristics from a deliverability perspective. However, the presence of ancient woodland is likely to represent a significant constraint that would need to be carefully addressed through site design and masterplanning, with implications for both the developable area and the overall scale of development that could be accommodated.

Site ID: 11300**Address:** Pippens, Tickerage Lane, Blackboys, TN22 5LT**Ward:** Framfield & Cross-in-Hand

Overall Site Area	3.86 ha
Current Use	Residential
Ownership	Private
Constraints	Priority Habitats
Suitable Site Area	3.86 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 to 10 years

- 3.39 The site comprises agricultural land in a single private ownership and is located adjacent to Blackboys, providing a strong physical relationship with the built-up area.
- 3.40 The site benefits from access via the existing road network, which would support its development potential.
- 3.41 A key constraint affecting the site is the presence of ancient woodland within part of the site area. This would require retaining woodland areas and providing appropriate buffer zones. As a result, any future proposals would need to demonstrate that impacts on the ancient woodland have been mitigated in accordance with local and national planning policy.
- 3.42 There is no known planning history associated with the site.
- 3.43 There may be highway-related concerns in the area, and further work would be required to establish whether the local road network could accommodate additional development without the need for mitigation or improvement measures.
- 3.44 Overall, the site's position adjacent to Blackboys and its single ownership are positive characteristics from a deliverability perspective. However, the presence of ancient woodland and potential highway constraints is likely to pose challenges that would need careful attention through site design and masterplanning.

Site ID: 15597**Address:** Diamonds Farm, Vines Cross Road, Horam, TN21 0HF**Ward:** Horam & Punnetts Town

Overall Site Area	1.61 ha
Current Use	Residential
Ownership	Private
Constraints	Flood Zone 3a (3% overlap on suitable area)
Suitable Site Area	1.55 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 – 10 Years

- 3.45 The site comprises a mix of commercial, agricultural and residential land and is located adjacent to Horam, providing a clear functional and physical relationship with the built-up area.
- 3.46 The site is under single ownership and benefits from access to the local road network, which is likely to support its deliverability. The site's position alongside the settlement edge may offer opportunities to create a logical extension to the existing built form, subject to detailed assessment of planning and environmental considerations.
- 3.47 A notable constraint affecting the site is Flood Zone 3b within the southern part of the site. While this area is understood to be limited to the southern section, it is likely to restrict development in those locations and reduce the overall developable area. Any future proposals would need to be informed by a detailed flood risk assessment.
- 3.48 The site also contains some industrial and commercial uses, although these are understood to be relatively low-grade in nature. Dependent on the scale and operational characteristics of these activities, there may be opportunities for redevelopment, rationalisation or incorporation within a wider development scheme.
- 3.49 Further assessment would be required to establish the contribution these uses make to the local economy and whether their retention, relocation or replacement would be appropriate. However, these uses also make the northern part of the site previously developed land.
- 3.50 There is no known planning history associated with the site. As a result, no recent planning precedent indicates the local planning authority's position on the principle of development at this location.

- 3.51 Overall, the site's being previously developed, its position adjacent to the settlement, single ownership and established access are positive attributes. However, flood-risk constraints in the southern part of the site and the presence of existing commercial uses will require consideration through the planning and masterplanning process.

Site ID: 16669

Address: Land East of Station Road, Berwick

Ward: Arlington



Overall Site Area	74.48 ha
Current Use	Agricultural
Ownership	Private Ownership, Leased to East Sussex County Council
Recommended Capacity	15
Constraints	Priority Habitats

Suitable Site Area	74.48 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	15 + years

- 3.52 The site comprises agricultural land located adjacent to the existing settlement and benefits from direct access to the local road network.
- 3.53 It is understood to be in private ownership and is currently leased to East Sussex County Council (ESCC). The site's proximity to Berwick, which includes Berwick train station, represents a notable sustainability advantage.
- 3.54 However, the site is substantially larger than the existing village and would represent a significant extension to the settlement if brought forward for development.
- 3.55 A proportion of the site lies beyond the existing settlement buffer zone, which may present policy considerations on sustainability depending on the nature and scale of any future proposals.
- 3.56 Nevertheless, the site's relationship to the settlement, together with its accessibility by rail, suggests that it could have strategic potential as a broad location of growth. This would also apply to neighbouring sites.
- 3.57 Given its size, any development would likely require a comprehensive masterplanning approach to ensure that infrastructure, access, green infrastructure and community facilities are appropriately integrated.
- 3.58 It is understood that the Council has previously held discussions with the landowners regarding growth at this location. The Council anticipated the site would come forward through the SHELAA process, although it has ultimately not been submitted.

- 3.59 This may indicate that proposals for the site are not yet sufficiently advanced, with the landowners potentially seeking to develop a more comprehensive masterplan before promoting the site through the next iteration of the Local Plan.
- 3.60 The principal issue associated with the site relates to deliverability. While the site's location adjacent to the settlement and close to the railway station provides several positive attributes, uncertainty remains about the landowner's intentions, the timing of site promotion, and the level of preparatory work required to support a comprehensive development proposal.
- 3.61 As such, the site may represent a longer-term development opportunity rather than a location capable of contributing to housing delivery in the short or even medium term.
- 3.62 There is no known planning history associated with the site. Consequently, no recent planning precedent indicates the local planning authority's position on development at this location.
- 3.63 Any future proposal would therefore need to be assessed on its own merits, taking account of the site's scale, relationship to the settlement, accessibility, policy constraints and overall deliverability.

Site ID: 16728**Address:** Land North of Butlers Lane**Ward:** Herstmonceux & Pevensey Levels

Overall Site Area	40.4 ha
Current Use	Agricultural
Ownership	Chichester Diocesan Fund And Board Of Finance (Incorporated)
Constraints	Priority Habitats
Suitable Site Area	40.4 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	10-15 years

- 3.64 The site comprises agricultural land in the ownership of the Chichester Diocesan Fund and Board of Finance (Incorporated). It is located broadly adjacent to Herstmonceux and benefits from access to the local road network.
- 3.65 From a physical perspective, the site is reasonably well connected to the settlement, although its scale and extent would result in a substantial expansion of the existing village.
- 3.66 A key constraint affecting the site is the presence of areas of ancient woodland. These environmental assets would require protection through appropriate stand-off distances and buffer zones, which are likely to reduce the overall developable area and consequently limit the site's development capacity.
- 3.67 Any future proposal would need to demonstrate that impacts on ancient woodland have been mitigated in accordance with local and national planning policy. This assessment has not done that.
- 3.68 The principal issue associated with the site is not necessarily its physical suitability, but rather the scale of development that it could facilitate relative to the size and function of the existing settlement.
- 3.69 Development of the site would represent a significant extension to the village and could potentially alter its character and scale. Local infrastructure and community facilities would therefore need to be carefully assessed for their ability to support substantial growth.
- 3.70 There is no known planning history associated with the site. Any future proposals would need to be considered on their own merits, taking account of the site's relationship to the settlement, environmental constraints, infrastructure requirements and overall compliance with local and national planning policy.
- 3.71 Overall, the site benefits from being in a single ownership, having established road access and possessing a degree of physical relationship with the settlement.

- 3.72 However, the presence of ancient woodland and, in particular, the scale of development that would be required to realise the site's potential are likely to be the key factors influencing its developability.

Site ID: 18686

Address: Land to rear of Bexhill Road, Ninfield

Ward: Herstmonceux & Pevensey Levels



Overall Site Area	1.22 ha
Current Use	Mixed Use
Ownership	Private
Constraints	None
Suitable Site Area	1.22 ha
Recommendation	Developable

Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.73 The site comprises agricultural land in a single private ownership and is located adjacent to Ninfield, providing a logical physical relationship with the built-up area.
- 3.74 There is an additional site directly adjacent (Site ID: 4731) which sits to the west of the site. Given the sites' proximity and their relationship to one another, it would be logical for them to come forward as a comprehensive development opportunity rather than as separate schemes.
- 3.75 Further engagement with the landowners would be beneficial to establish whether the sites are under a single ownership but held under separate land registry titles, or whether they are in the control of different owners. This would help to clarify the potential for coordinated development and the likely deliverability of the sites.
- 3.76 A key consideration for the site is access. The site is currently accessed via a narrow track road. The suitability of the track road to accommodate residential or mixed-use development is uncertain and may require improvement works.
- 3.77 Matters such as highway capacity, visibility, road width and the ability to accommodate increased traffic movements would need to be assessed in detail through any future planning application process.
- 3.78 There is no known planning history associated with the site. As a result, no recent planning precedent indicates the local planning authority's position on the principle of development at this location.

- 3.79 Overall, the site's location adjacent to the settlement and its single ownership may represent positive attributes from a development perspective.
- 3.80 However, further work would be required to establish the suitability and capacity of the existing access arrangements, together with any constraints arising from the continued presence of agricultural buildings and the operational requirements of the surrounding rural area.
- 3.81 Additionally, its future development potential is likely to be closely linked to the adjoining site, with a comprehensive and coordinated approach likely to represent the most effective means of bringing the land forward for development.

Site ID: 19203

Address: Land off Lower Street, Ninfield

Ward: Herstmonceux & Pevensey Levels



Overall Site Area	1.29 ha
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Current Use	Mixed Use
Ownership	Private
Constraints	Archaeological Notification Areas
Suitable Site Area	1.16 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.82 The site comprises a mix of agricultural land and a ponded/water feature and is understood to be in single private ownership. It is located adjacent to Ninfield and benefits from access to the local road network.
- 3.83 A key consideration is the site's relationship with the adjoining site (Site ID: 77212). Given their proximity, there may be opportunities for the two sites to come forward as a coordinated development proposal, allowing matters such as access, infrastructure provision, landscape integration and site layout to be addressed comprehensively.
- 3.84 However, given that the two sites can access the road network individually, this may not be required. The sites therefore have the potential to come forward independently, depending on the scale of development proposed and the ability to achieve suitable access and infrastructure arrangements.
- 3.85 The Council suggested that topography may present a constraint to development, as a nearby appeal relating to development at St Mary's was dismissed in part due to concerns associated with the sloping nature of the land in this location.

- 3.86 Whilst this does not directly relate to the site itself, it suggests that ground levels and topographical conditions may require further investigation to establish whether similar issues could affect the site's development potential.
- 3.87 Any future proposals would therefore benefit from an assessment of site levels, developable areas and the implications of slope for design, access and drainage.
- 3.88 A high-level appraisal from Iceni's landscape team suggests that the site is less open and less sloping than the appeal site.
- 3.89 There is no known planning history associated with the site. However, land immediately to the west is currently the subject of a pending planning application (Reference: WD/2026/0230/F) for the erection of a self-build dwelling at the time of writing.
- 3.90 Overall, the site's location adjacent to the settlement, single ownership, and established road access represent positive attributes from a development perspective.
- 3.91 However, consideration will need to be given to the potential implications of site topography, alongside whether the site is best promoted independently or as part of a more comprehensive scheme in conjunction with the adjoining site.

Site ID: 48858**Address:** Land East of Station Road, Berwick**Ward:** Arlington

Overall Site Area	10.46 ha
Current Use	Mixed Use
Ownership	Private
Constraints	Flood Zone 2
Suitable Site Area	10.46 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 to 10 years

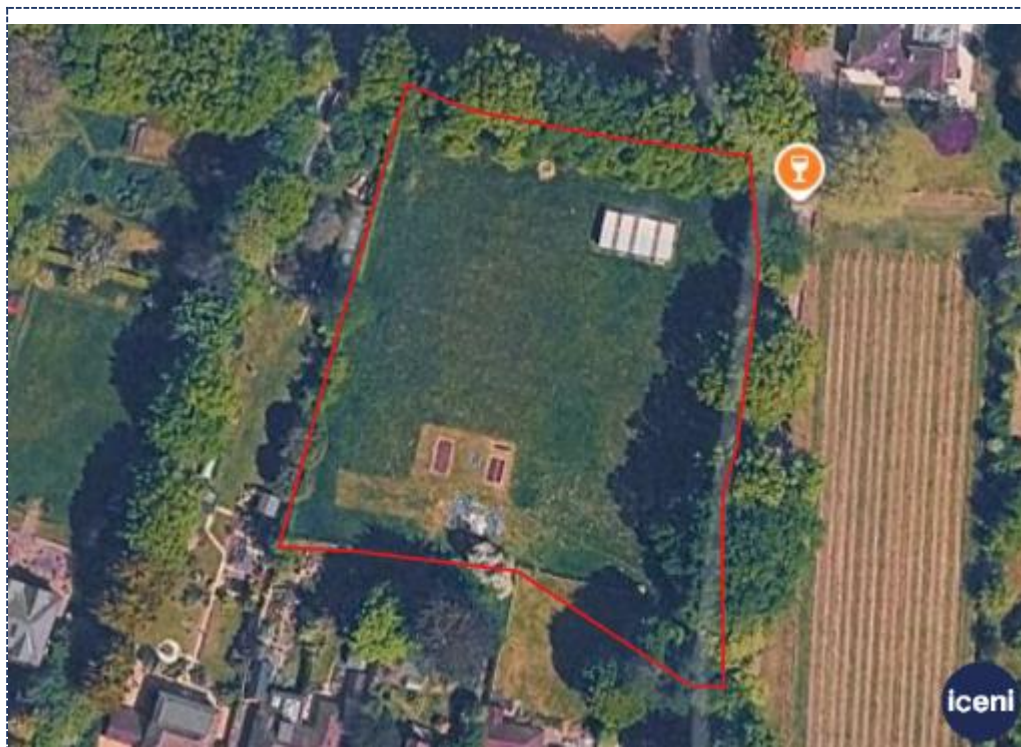
- 3.92 The site comprises a mix of agricultural land and a ponded/water feature and is understood to be in single private ownership. It is located adjacent to Berwick and benefits from access to the local road network.
- 3.93 The site's proximity to Berwick and its train station represents a notable sustainability advantage. However, the site is larger than the existing village and would represent a significant extension to the settlement if brought forward for development, particularly if brought forward alongside the other sites near to Berwick Station (Site ID's: 16669 and 59373)
- 3.94 A proportion of the site lies beyond the existing settlement buffer zone, which may present policy considerations dependent on the nature and scale of any future proposals.
- 3.95 Nevertheless, the site's relationship to the settlement, together with its accessibility by rail, suggests that it could have strategic potential as a longer-term growth location.
- 3.96 Given its size, any development would likely require a comprehensive masterplanning approach to ensure that infrastructure, access, green infrastructure and community facilities are appropriately integrated.
- 3.97 It is understood that the Council has previously had discussions with landowners regarding growth at this location. The Council anticipated other sites under the same ownership to come forward through the SHELAA process, although these were never submitted.
- 3.98 The principal issue associated with the site relates to deliverability. While the site's location adjacent to the settlement and proximity to the railway station provide several positive attributes, uncertainty remains regarding the landowner's intentions.
- 3.99 As such, the site may represent a longer-term development opportunity rather than a location capable of contributing to housing delivery in the short or medium term. It could also be seen as a broad search area alongside its neighbouring sites.

- 3.100 There is no known planning history associated with the site. Consequently, no recent planning precedent indicates the local planning authority's position on development at this location.
- 3.101 Any future proposal would therefore need to be assessed on its own merits, taking account of the site's scale, relationship to the settlement, accessibility, policy constraints and overall deliverability.

Site ID: 54721

Address: Land north of Vines Cross Road, Horam

Ward: Horam & Punnetts Town



Overall Site Area	0.59 ha
Current Use	Mixed Use
Ownership	Private
Constraints	None
Suitable Site Area	0.59 ha

Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 – 10 Years

- 3.102 The site comprises agricultural/garden land in single private ownership and is located adjacent to Horam. Access is available via a track to the east of the site, which may provide a suitable basis for future development, subject to detailed assessment of highway capacity and access design.
- 3.103 The site's relationship with the settlement suggests that it could potentially accommodate a modest scale of growth. However, its context within the wider pattern of development will be an important consideration.
- 3.104 Although the site meets the minimum size threshold set by the identification methodology, given the character of the surrounding area and the prevailing pattern of development, it is difficult to see how a scheme of five or more dwellings would work on the site.
- 3.105 With this in mind, proposals for the site may be more appropriately considered through the development management process (and as windfall) rather than as a formal allocation within the emerging Local Plan.
- 3.106 The planning context in the immediate area provides some indication of the potential for development. In 2024, planning permission was granted on appeal (Reference: WD/2023/2139/F) to replace an agricultural barn with a single-storey carbon-positive dwelling, including a change of land use to residential and the creation of a new access.

- 3.107 Overall, the site benefits from several positive attributes, including its position adjacent to the settlement, single ownership and established road access.
- 3.108 However, the principal consideration may be whether the site is best regarded as a future windfall opportunity capable of delivering a small number of dwellings, rather than a site requiring formal allocation through the Local Plan process.

Site ID: 59373

Address: New Barn Farm, Lewes Road, Alciston, BN26 6UG

Ward: Arlington

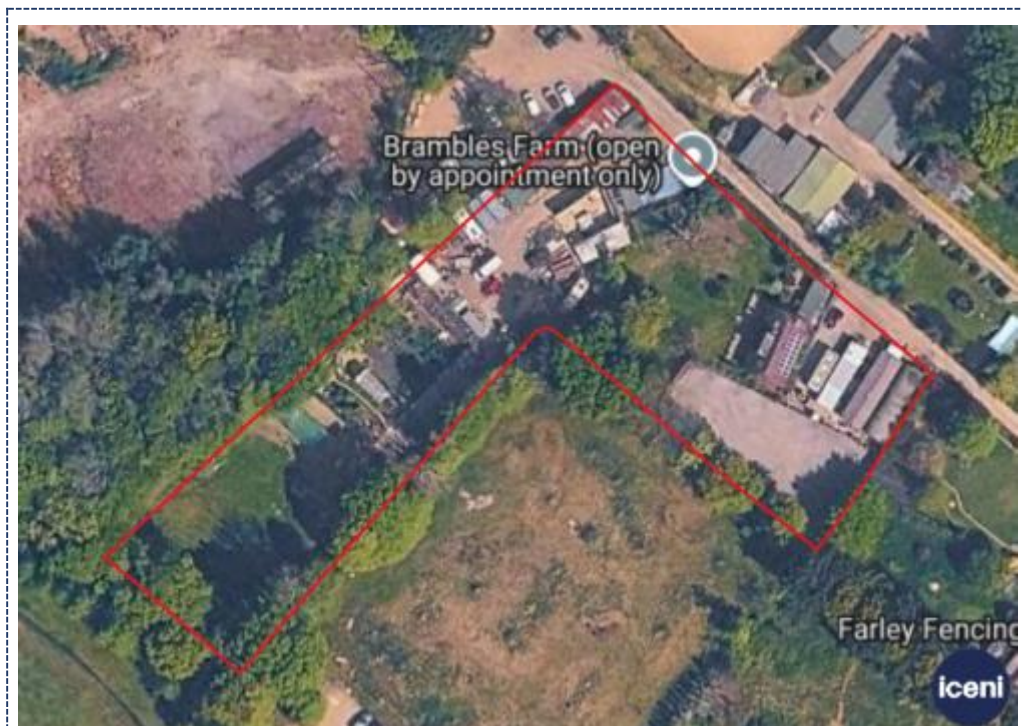


Overall Site Area	51.96 ha
Current Use	Agriculture
Ownership	Private
Constraints	None

Suitable Site Area	51.96 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	10
Potential Delivery Timeframe	Over 15 Years

- 3.109 The site comprises agricultural land located remote from the existing settlement of Berwick Station, although still within the 500-metre buffer zone. The site benefits from direct access to the local road network. It is under private ownership.
- 3.110 Another assessed site (Site ID: 16669) lies to the east. The site's location is close to Berwick Station village and its train station, which is a notable sustainability advantage. The site is substantially larger than the existing village and would represent a significant extension to the settlement if brought forward for development.
- 3.111 A proportion of the site lies beyond the existing settlement buffer zone, which may present policy considerations dependent on the nature and scale of any future proposals.
- 3.112 Nevertheless, the site's relationship to the settlement, together with its accessibility by rail, suggests that it could have strategic potential as a broad area of growth.
- 3.113 Given its size, any development would likely require a comprehensive masterplanning approach to ensure that infrastructure, access, green infrastructure and community facilities are appropriately integrated.
- 3.114 It is understood that the Council has previously had discussions with landowners regarding growth at this location. The Council anticipated the adjoining site to come forward through the SHELAA process, although this was not submitted.

- 3.115 The principal issue associated with the site relates to deliverability. While the site's location provides positive attributes, uncertainty remains regarding the landowner's intentions, the timing of site promotion, and the level of preparatory work required to support a comprehensive development proposal of a site of this scale.
- 3.116 As such, the site may represent a longer-term development opportunity rather than a location capable of contributing to housing delivery in the short or medium term.
- 3.117 There is no known planning history associated with the site. Consequently, no recent planning precedent indicates the local planning authority's position on development at this location.
- 3.118 Any future proposal would therefore need to be assessed on its own merits, taking account of the site's scale, relationship to the settlement, accessibility, policy constraints and overall deliverability.

Site ID: 62237**Address:** Annexe, Clear Hedge Farm, Chiddingly Road, Horam, TN21 0JJ**Ward:** Horam & Punnetts Town

Overall Site Area	0.56 ha
Current Use	Residential
Ownership	Private
Constraints	None
Suitable Site Area	0.56 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.119 The site comprises agricultural land with several existing buildings and is understood to be in single private ownership. The site is located adjacent to Horam and is accessed via an existing track.
- 3.120 The presence of existing structures may indicate that parts of the site could potentially be considered previously developed land. This, along with the site's location adjacent to the settlement and its single ownership, is likely to be a positive factor for deliverability.
- 3.121 However, based on its characteristics and the development pattern in the surrounding area, it is unclear whether the site would accommodate more than five dwellings. As such, it may be more appropriately viewed as a potential windfall opportunity rather than a strategic allocation requiring formal identification through the Local Plan process.
- 3.122 There is no known planning history associated with the site itself. However, the surrounding area has experienced a mixture of successful and unsuccessful residential proposals, providing some indication of the planning context.
- 3.123 The site immediately to the south received outline planning permission in 2021 for five dwellings (Reference: WD/2020/1746/O). It is currently unclear whether this permission has been implemented, although the approval demonstrates that a limited scale of residential development has previously been considered acceptable in the immediate vicinity.
- 3.124 Further to the south, a planning application for seven dwellings was refused and subsequently dismissed at appeal. The principal issue in that case related to surface water flooding affecting the south-eastern edge of the site.
- 3.125 Importantly, this constraint does not appear to affect the site under consideration and therefore may have limited relevance when assessing its development potential.
- 3.126 Nevertheless, the appeal decision highlights the importance of understanding local drainage conditions and ensuring that any future

proposals are supported by appropriate flood risk and drainage evidence.

3.127 Overall, the site benefits from its relationship to the settlement, single ownership and the potential presence of previously developed land. The local planning context suggests that small-scale residential development may be achievable in the area, although the site's likely capacity appears relatively modest.

3.128 Consequently, the site may be more appropriately considered as a future windfall opportunity, particularly if it is unlikely to make a significant contribution to housing supply through a formal allocation.

Site ID: 64685

Address: Centre of Pond, 409 m from Oxspring, Poundfield Road

Ward: Arlington



Overall Site Area	15.11 ha
Current Use	Agricultural

Ownership	Private
Constraints	None
Suitable Site Area	15.11 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 to 10 years

- 3.129 The site comprises agricultural land in single private ownership and is located adjacent to Chalvington. Access is likely to be achievable from the western part of the site, although the extent to which this could support future development would require further investigation. No planning history is known for the site.
- 3.130 A key consideration is that development of the site may be viewed as out of keeping with the existing settlement. The site's location and relationship to surrounding development could lead to growth that appears detached from the village's established pattern, potentially affecting its character and identity.
- 3.131 Careful consideration would need to be given to how any development could be integrated into the settlement.
- 3.132 The sustainability of the location is also likely to be a significant constraint. Chalvington is not identified as a Tier 4 settlement within the Council's settlement hierarchy within the emerging Local Plan, which may limit its suitability for accommodating additional growth.
- 3.133 Overall, while the site benefits from a single ownership and a degree of physical adjacency to the settlement, concerns regarding the sustainability of the location and the site's relationship to the existing

pattern of development are likely to represent the principal challenges to its future development potential.

Site ID: 73034**Address:** Land North of Hankham Hall Road, Hankham**Ward:** Herstmonceux & Pevensey Levels

Overall Site Area	0.91 ha
Current Use	Agricultural
Ownership	Private
Constraints	None
Suitable Site Area	0.91 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20

Potential Delivery Timeframe	5 – 10 Years
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- 3.134 The site comprises an open agricultural field in single private ownership and is located adjacent to the settlement of Hankham. The site benefits from existing road access, which may support its development potential.
- 3.135 However, whilst the site adjoins Hankham, the settlement is small and lacks a broad range of services and facilities, which is likely to be a significant constraint. Hankham is not identified as a Tier 4 settlement within the relevant settlement hierarchy of the emerging Wealden Local Plan, which may limit its suitability for accommodating additional growth.
- 3.136 Overall, while the site benefits from a single ownership and a degree of physical adjacency to the settlement, concerns regarding the sustainability of the location and the site's relationship to the existing pattern of development are likely to represent the principal challenges to its future development potential.

Site ID: 74845**Address:** Land South of B2204, Ninfield**Ward:** Herstmonceux & Pevensey Levels

Overall Site Area	2.07 ha
Current Use	Mixed Use – Equestrian Paddock and Grazing land
Ownership	Private
Constraints	None
Suitable Site Area	2.07 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.137 The site comprises a field and paddock landholding in single private ownership and is located adjacent to Ninfield, which is to the west. The site is currently accessed via a track road, which connects to the local highway network, although the suitability of this access for future development would require further assessment.
- 3.138 The site's proximity to Ninfield and its single ownership are positive attributes from a deliverability perspective. However, there is a small gap to the main part of the village, and development could create a natural infill site.
- 3.139 There is no known planning history associated with the site itself. However, the surrounding area has experienced some recent development activity, which may have implications for the site.
- 3.140 In particular, the cumulative impact of nearby development on the local highway network may necessitate access improvements or other highway mitigation measures to ensure that future growth can be accommodated safely and efficiently.
- 3.141 Overall, the site's single ownership is a favourable characteristic that may support its development potential. However, further consideration is needed on access arrangements and the potential implications of nearby development on the local highway network to establish the site's suitability and deliverability.

Site ID: 77212**Address:** Very Berry Farm, Church Lane, Ninfield, TN33 9JW,**Ward:** Herstmonceux & Pevensey Levels

Overall Site Area	2.72 ha
Current Use	Mixed Use
Ownership	Private
Constraints	None
Suitable Site Area	2.72 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15
Potential Delivery Timeframe	5 – 10 Years

- 3.142 The site comprises agricultural land in single private ownership and is located adjacent to Ninfield. Access is currently available via a country lane, although the suitability of the existing arrangements to accommodate future development would require further assessment.
- 3.143 Depending on the scale of development proposed, there may be a need for access or highway improvements to ensure that appropriate standards of visibility, road safety and vehicular movement can be achieved.
- 3.144 A key consideration is the site's relationship with the adjoining site (Site ID: 77212). Given their proximity, there may be opportunities for the two sites to come forward as a coordinated development proposal, allowing matters such as access, infrastructure provision, landscape integration and site layout to be addressed comprehensively.
- 3.145 However, given that the two sites can access the road network individually, this may not be required. The sites therefore could come forward independently, depending on the scale of development proposed and the ability to achieve suitable access and infrastructure arrangements.
- 3.146 Topography may present a constraint to development. A nearby appeal relating to development at St Mary's (Ref: APP/C1435/W/25/3366061) was dismissed in part due to concerns about the land's sloping nature.
- 3.147 Whilst this does not directly relate to the site itself, it suggests that ground levels and topographical conditions may require further investigation to establish whether similar issues could affect the site's development potential.
- 3.148 Any future proposals would therefore benefit from an assessment of site levels, developable areas and the implications of slope for design, access and drainage.
- 3.149 A high-level appraisal from Iceni's landscape team suggests that the site is less open and less sloping than the appeal site.

- 3.150 There is no known planning history associated with the site as a whole. However, a northern section of the site is currently the subject of a planning application to construct a single self-build dwelling (reference WD/2026/0230/F). At the time of writing, the application remains pending.
- 3.151 Overall, the site's location adjacent to the settlement, single ownership, and established road access represent positive attributes from a development perspective.
- 3.152 However, consideration will need to be given to the potential implications of site topography, alongside whether the site is best promoted independently or as part of a more comprehensive scheme in conjunction with the adjoining site.
- 3.153 The determination of the current self-build application may also provide a useful indication of the site's prospects for future development.

Site ID: 80275

Address: Land South of Horebeech Lane, TN21 9EA

Ward: Horam & Punnetts Town



Overall Site Area	0.8 ha
Current Use	Residential
Ownership	Private
Constraints	None
Suitable Site Area	0.8 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	20
Potential Delivery Timeframe	5 – 10 Years

- 3.154 The site comprises agricultural land in single private ownership and is located adjacent to the settlement of Horam. The site has direct access to the road network via Horebeech Lane to the north.
- 3.155 The site's location adjoining the settlement edge could allow for a logical extension of the existing built form, depending on the scale and nature of any future proposal.
- 3.156 The planning context surrounding the site is a notable consideration. Residential development has been approved on adjacent land to the west (Ref: WD/2021/2356/MAO) for 38 dwellings, which demonstrates that the principle of housing growth has been accepted in the immediate area. However, the site has no planning history.
- 3.157 Going forward, any application would need to consider the site's relationship with Horam, access arrangements and landscape impacts.
- 3.158 Overall, the site's position adjacent to the settlement, single ownership and established access arrangements are positive attributes from a deliverability perspective.

- 3.159 The existence of residential permissions on nearby land may further support the site's development potential. However, any future proposals would still need to demonstrate that they can integrate appropriately with the existing settlement pattern and infrastructure while avoiding unacceptable environmental or amenity impacts.

Site ID: 83441

Address: Land off Buttsfield Lane

Ward: Chiddingly, East Hoathly & Waldron



Overall Site Area	0.71 ha
Current Use	Mixed Use
Ownership	Swansea Enterprises Corp
Constraints	None
Suitable Site Area	0.71 ha
Recommendation	Developable
Recommended Dwellings Per Hectare	15

Potential Delivery Timeframe	5 – 10 Years
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- 3.160 The site comprises an open agricultural field in the ownership of Swansea Enterprises and is located adjacent to East Hoathly, providing a clear physical relationship with the existing settlement.
- 3.161 The land benefits from access via a country lane, which provides a connection to the local highway network. Whilst the site's location adjoining the settlement may support its development potential, the suitability and capacity of the existing access arrangements would need to be assessed in the context of any future development proposals.
- 3.162 The site's position on the edge of East Hoathly could allow for a logical extension of the settlement, subject to consideration of landscape impacts, access arrangements and compliance with local and national planning policy.
- 3.163 There is no known planning history associated with the site. Any future proposal would need to consider the site's relationship to the settlement, the character of the surrounding area, infrastructure capacity and any environmental constraints that may emerge through more detailed assessment.
- 3.164 Overall, the site's position adjacent to East Hoathly and single ownership represent positive characteristics that may support its suitability and deliverability.

Site Assessment Summary

- 3.165 On the basis of the high-level site assessments, the strongest sites for further consideration as potential allocations are those at Horam, Ninfield, Herstmonceux and East Hoathly, where sites generally benefit from a clearer physical relationship with existing settlements, single ownership, more limited identified constraints and indicative delivery

within 5–10 years if there is genuine interest from the landowner to move forward with the sites. These are submitted to the Council's SHELAA process.

- 3.166 The Berwick sites may offer a more strategic opportunity given their proximity to rail infrastructure. Still, their scale, relationship to the existing village, and 'uncertainty' over delivery suggest they are better considered as a longer-term broad location for growth rather than conventional site allocations, and may be viewed as sites to consider in the next iteration of a Local Plan.

4. Capacity Considerations

- 4.1 This section draws together the findings of the detailed site assessments and considers their implications for potential housing capacity, density and delivery.
- 4.2 Table 4.1 below shows that the sites identified through the detailed assessment are concentrated in a limited number of locations, with the largest group of sites at Ninfield, followed by Horam, Halland and Berwick.
- 4.3 For these settlements, recommended density assumptions generally fall between 15 and 20 dwellings per hectare, reflecting the predominantly rural and edge-of-settlement context of the sites, with a lower density applied to the largest and more sensitive broad growth opportunity at New Barn Farm in Berwick.
- 4.4 The majority of sites are identified as having the potential to come forward within 5–10 years. However, larger or more complex opportunities, particularly at Berwick and those linked to operational land uses or comprehensive masterplanning requirements, are likely to require longer lead-in periods that potentially go beyond the emerging Local Plan period.

Table 4.1 Site Details - by location

Location	Site ID	Site/address	Density dph	Indicative Capacity	Delivery timeframe
Berwick	16669	Land East of Station Road	15	1,117	15+ years
	48858	Land East of Station Road	15	157	5–10 years
	59373	New Barn Farm, Lewes Rd, Alciston	10	520	15+ years
Blackboys	11300	Pippens, Tickerage Lane, Blackboys	15	58	5–10 years
Chalvington	64685	409 Oxspring, Poundfield Rd	15	227	5–10 years
East Hoathly	83441	Land off Buttsfield Lane	15	11	5–10 years
Halland	863	Land South of Knowle Lane,	15	97	10–15 years; longer if continuing to be operational
	3241	Land North of Knowle Lane,	15	12	5–10 years
	84014	Staverton Nursery, Eastbourne Rd	20	43	5–10 years; longer if continuing to be operational
Hankham	73034	Land North of Hankham Hall Rd, Hankham	20	18	5–10 years
Herst- monceux	5777	Land south of Chestnut Lodge, West End	20	120	5–10 years
	16728	Land North of Butlers Lane	15	606	10–15 years
Horam	15597	Diamonds Farm, Vines Cross Rd	15	23	5–10 years

Location	Site ID	Site/address	Density dph	Indicative Capacity	Delivery timeframe
	54721	Land north of Vines Cross Rd	15	9	5–10 years
	62237	Annexe, Clear Hedge Farm, Chiddingly Rd	20	11	5–10 years
	80275	Land South of Horebeech Ln	20	16	5–10 years
Ninfield	4713	Land East of Bexhill Rd	20	20	5–10 years
	18686	Land to the rear of Bexhill Rd	20	24	5–10 years
	19203	Land off Lower St	20	26	5–10 years
	74845	Land South of B2204	20	41	5–10 years
	77212	Very Berry Farm, Church Ln	15	32	5–10 years

4.5 The table below shows the potential number of dwellings that could be delivered at each location. The site assessments and capacity assumptions should be interpreted as a high-level review of potential development opportunities, rather than as definitive conclusions regarding allocation or the acceptability of a planning application.

4.6 Many of the sites are sensitive in planning terms due to their edge-of-settlement or rural context, relationship with smaller settlements, access constraints, landscape and ecological considerations, flood risk, existing operational uses, or the need for comprehensive masterplanning.

Table 4.2 Potential Capacity by Location

Settlement	Range of dwellings per hectare	Potential Capacity
Berwick	10 - 15	1,794
Blackboys	15	58
Chalvington	15	227
East Hoathly	15	11
Halland	15-20	152
Hankham	20	18
Herstmonceux	15-20	726
Horam	15-20	59
Ninfield	15-20	143

- 4.7 The capacity, density and delivery assumptions identified through this review are therefore indicative. They should be treated as a basis for further testing through the Local Plan process, including more detailed evidence on landscape, highways, infrastructure, environmental constraints, landowner intentions and deliverability.
- 4.8 The capacity at each site will also be determined to some degree by the market. However, developers should be encouraged to use land as efficiently as possible without harming the character of each area.
- 4.9 As set out in the table above, the majority of the additional capacity was identified in and around Berwick. While the village has a train station and the NPPF is moving towards development in sustainable locations, growth on this scale is unlikely in the short or even medium term and would radically transform the village.
- 4.10 This land has not been formally provided to the Council within its SHELAA process, and therefore, there are significant questions over deliverability.

- 4.11 While the village could sustain additional growth, this should be carefully controlled and perhaps would be best done through a comprehensive masterplan process.

Review of Existing Allocations

- 4.12 The purpose of this section of the report is to gain a better understanding of the potential to drive increased housing delivery at the draft housing allocations. A design perspective principally drives this.
- 4.13 Densities within the draft ‘focused’ Wealden Local Plan (Regulation 18) site allocations have been calculated on a gross site area basis, incorporating undevelopable land such as drainage features, woodland, environmental constraints, and potential public open space (POS).
- 4.14 As a result, the derived densities appear relatively low. Previous work undertaken by Iceni Design assessed existing densities using a more narrowly defined development area that excluded these elements.
- 4.15 On this basis, we consider it appropriate to apply densities towards the mid-range of the maximum densities previously identified. For clarity, our preferred approach is to calculate density on a net developable area basis, excluding POS and other undevelopable land.
- 4.16 In some instances, the recommended densities within this assessment are higher than those derived from the gross site analysis. This reflects the expectation that environmental and physical constraints will occupy a proportion of the gross site area and will therefore not contribute to the net developable area.
- 4.17 Consequently, the recommended densities are intended to represent the density that could realistically be achieved across the developable area and are considered to provide a more accurate indication of the number of dwellings likely to be delivered.

- 4.18 Assumed densities for the proposed site allocations have been derived through a high-level assessment of each site's context, surrounding development, and known constraints.
- 4.19 The proposed densities are indicative only and have been informed by factors including settlement character, adjacent residential densities, landscape sensitivity, heritage assets, woodland, flood risk, Public Rights of Way, and neighbouring land uses.
- 4.20 It should be noted that indicative capacities based on gross site area multiplied by the assumed density are unlikely to reflect the eventual number of dwellings delivered.
- 4.21 Site-specific constraints, including Ancient Woodland buffers, retained trees, landscape mitigation, flood mitigation, public open space (POS), and other infrastructure requirements, will reduce the net developable area.
- 4.22 As such, the assumed densities should be treated as strategic assumptions for site comparison rather than definitive development capacities that take account of the factors highlighted in paragraph 4.21.
- 4.23 As a broad rule of thumb, smaller sites (typically accommodating tens of dwellings) are generally expected to achieve a net developable area equivalent to approximately 80–90% of the gross site area, medium-sized sites (hundreds of dwellings) around 75%, and strategic urban extensions (thousands of dwellings) around 50%. Actual developable areas will vary depending on the nature and extent of site-specific constraints.
- 4.24 The table below sets out our assessment of density assumptions made for the proposed local plan allocations; these are organised by settlement.

Table 4.3 Potential Increased Density Assumptions

	Iceni Capacity 2024		Focused LP Allocation	
Location	Min dph	Max dph	Proposed dph (Based on gross area)	Recommended dph (Based on gross area)
Berwick	10 - 15	20	14	20
Buxted	10 - 15	20 - 25	15	20
Crowborough	20 - 25	50 - 55	18	25
East Hoathly	20	25	17	20
Framfield	10 - 15	20 - 25	10	20
Frant	20	20	10	20
Hailsham	20 - 25	50 - 55	10	20
Hartfield	20	25	12	20
Heathfield and Waldron	20 - 25	50 - 55	15	25
Hertsmonceux	25	30	13	20
Horam	25	30	15	25
Isfield	20 - 22	25	17	25
Maresfield	25 - 35	45 - 50	20	35
Ninfield	20	25	25	25
Pevensey	25 - 30	40 - 45	20	30
Polegate	20 - 25	35 - 40	15	25
Rotherfield	25	30	10	20
Uckfield	20 - 25	45 - 50	10	20
Wadhurst	15 - 20	30 - 35	16	30
Westham	15 - 20	30	20	30
Willingdon and Jevington	20 - 25	25 - 30	15	25
Withyham*	-	-	10	20

Source: Iceni Projects, 2026 *note reviewed in 2024 report

Existing Policy Review

- 4.25 In addition to the site-specific capacity assessment, consideration should be given to whether revised or new district-wide policies could

assist the Council in maximising suitable development opportunities across Wealden.

- 4.26 This is particularly relevant in light of the Regulation 18 Local Plan material³ published in 2024 and the subsequent 'Focused' Regulation 18 consultation⁴ in 2026.
- 4.27 The 'Focused' Local Plan does not contain any specific policies relating solely to housing density; rather, Policy SS1 – Spatial Strategy for Wealden requires development proposals to apply appropriate densities to sites.
- 4.28 The March 2024 Wealden Local Plan included Policy HO2: Density, which sets an expectation for efficient land use and optimising site capacity while delivering high-quality, sustainable, and well-designed places.
- 4.29 The Council may wish to retain and strengthen this approach through a clear policy expectation around higher densities in the most sustainable and least constrained locations, particularly on larger sites with good public transport accessibility or those capable of being planned comprehensively.
- 4.30 This could reflect the recently published density guidance within the August 2026 National Planning Policy Framework, including the minimum 35 dwellings per hectare around train stations and 45 around stations with a frequent service.
- 4.31 Although the Local Plan will be examined using the 2024 NPPF, it is worth considering some of the relevant policies set out in the 2026 NPPF, such as setting residential density standards for Town Centres

³ <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/new-local-plan/wealden-local-plan/local-plan-supporting-documents/>

⁴ <https://www.wealden.gov.uk/UploadedFiles/Draft-Focused-Local-Plan-Accessible-Version.pdf>

and areas with good connectivity and potentially other areas and seeking justification of lower densities through character, heritage, infrastructure, amenity, viability, etc.

- 4.32 However, potential policy such as this would need to note that development proposals should also be balanced against settlement character, landscape sensitivity and other factors and constraints such as flood risk and biodiversity net gain.
- 4.33 The effect of any such policy change should be assessed by site typology. Sites within or adjoining the main towns, larger service settlements, and rail-accessible locations may have scope for a modest uplift where constraints are limited, and a higher-density form is compatible with local character.
- 4.34 Smaller village-edge sites, isolated rural locations and constrained sites are unlikely to experience a material increase in capacity solely as a result of a revised density policy.

5. Delivery Acceleration Options

- 5.1 This section of the report provides the Council with advice relating to accelerating and increasing delivery within existing sites.
- 5.2 Wealden's housing need under the current Standard Method is 1,465 dwellings per annum (dpa), driven substantially by a 141% affordability adjustment. This is a marked step-change above recent delivery, which has trended broadly upwards but peaked at 1,138 completions in 2023.
- 5.3 Meeting this need will therefore require a substantial increase in housing delivery rates above those achieved in the past. This will require the Local Plan to identify a sufficient supply of land where possible.
- 5.4 However, the impacts of other policies on housing delivery will also need to be considered. The spatial strategy, allocations, and supporting policies need to be structured to sustain a steady, increasing flow of completions throughout the plan period.
- 5.5 This section comments, at a high level, on the principal levers available to the Council to support higher delivery against whatever requirement is taken forward.

Plan positively, with a robust and flexible land supply.

- 5.6 The most important driver of delivery is the scale of provision planned for, underpinned by a genuine surplus of deliverable sites. Identifying land broadly in line with need — with headroom above the minimum requirement — gives the market the capacity to deliver at the required rate and provides contingency against slippage on individual sites.

- 5.7 However, this is not always possible due to environmental constraints, infrastructure constraints or market interest. That said, delivery responds to what is planned for, so past rates are a weak guide to future potential: where an authority has planned for low numbers, or lacked an up-to-date plan, delivery has been correspondingly suppressed.
- 5.8 The stock growth rate — the annual percentage increase in the total number of homes — is a useful way to benchmark housing delivery between authorities and over time.
- 5.9 Considering the stock growth rates achieved in high-growth authorities illustrates the impact of planning positively and provides some guidance on the potential scope for local delivery.
- 5.10 Critically, an uplift in the planned figure, supported by a robust pipeline, has translated into a step-change in actual delivery elsewhere, including:
- **Maidstone** increased delivery from around 669 dpa (2008–16) to around 1,380 dpa or a stock growth rate of around 1.9% (2016–22) following adoption of its 2017 Local Plan with a higher target and a robust supply of sites.
 - The **Oxfordshire** authorities achieved rapid, sustained increases in stock growth after putting ambitious plans in place, supported by a Housing and Growth Deal with Government that funded infrastructure in return for plan-making commitments. Several are at the top of stock growth rankings across the South East, with Vale of White Horse achieving a growth rate of 2.4% over five years.
- 5.11 More broadly, several higher-growth authorities in the South East have sustained stock growth of around 1.4–1.6% per annum over 20-year periods, with some reaching around 2.2% over five years.

- 5.12 The common thread is that higher-than-historical delivery is achievable where positive planning is matched by supportive development management and, crucially, by infrastructure delivery.

Broaden and diversify the supply base.

- 5.13 Relying on a small number of large strategic sites concentrates risk, because the rate at which homes can be sold limits how quickly any single site builds out.
- 5.14 A wider mix of sites (small/medium/large, urban/suburban/rural), spread across the district's distinct sub-markets, enables more homes to be built and sold simultaneously.
- 5.15 Wealden's housing market is not uniform: its northern areas around Crowborough and Heathfield relate more closely to Tunbridge Wells; Forest Row and the Ashdown Forest fringe look to East Grinstead and the wider Horsham–Crawley housing market; and Uckfield, Hailsham and the south relate to the Sussex Coast and, in places, Hastings and Rother. Spreading allocations across these areas widens the pool of buyers who can purchase at any one time.
- 5.16 Smaller and medium sites are valuable here: they pass through the planning process and mobilise more quickly, and national evidence indicates that a given number of homes spread across many small sites typically builds out faster than the same number on one large site.
- 5.17 The March 2024 Regulation 18 Local Plan addresses this issue through policy HO4, which supports development of less than 1 Ha where it provides a mix of smaller homes, self- and custom-build, affordable housing and specialist accommodation.

Maximise build-out on strategic sites

- 5.18 Where strategic sites are relied upon, their delivery profile can be improved at the plan-making stage, while the Council still holds leverage over promoters seeking allocations.
- 5.19 The rate at which a site delivers is constrained principally by the rate at which homes can be sold locally (its “absorption rate”), and one way to raise it is to increase the number of sales outlets — distinct parcels, each with its own housebuilder and marketing presence, selling at the same time.
- 5.20 Lichfields’ Start to Finish research is the standard national reference on build-out on large sites. It finds that build-out tends to be faster where there are more outlets, on greenfield rather than brownfield land, where affordability pressures are more acute, and where there is a higher proportion of affordable housing.
- 5.21 Used alongside a local baseline drawn from Wealden’s own monitoring records, it gives an evidence-based footing for the build-out assumptions in the trajectory.
- 5.22 In practice, the number of outlets can be increased by designing in multiple points of access from the outset, so that separate parcels can be opened up and marketed in parallel rather than sequentially, and by product differentiation within the market — a spread of house types, sizes, price points and tenures that appeal to different buyers, so that parcels sell alongside one another rather than competing for the same purchasers.
- 5.23 Much of this lies within the control of the site’s promoter and housebuilders rather than the Council, whose influence is exercised mainly through site layout and access requirements, design codes, masterplan frameworks and policies on product and tenure diversity set at the point of allocation.

Product diversity

- 5.24 A wider range of products allows more homes to be absorbed each year and makes delivery more resilient when the private-sale market is weak.
- 5.25 This is directly relevant in Wealden, where local agents report a cautious sales market concentrated in the £400,000–£500,000 bracket and on smaller family homes, with larger four- and five-bedroom new-build homes proving harder to sell.
- 5.26 A mix weighted towards the products the market is actually absorbing will itself support faster delivery. The same logic extends to Build-to-Rent and to retirement and specialist housing, both of which are absorbed largely independently of the private sales market.

Build to Rent

- 5.27 The 2021 Census shows that 13% of households lived in the Private Rented Sector in the district. This was a 0.8-percentage-point increase over the equivalent figure in the 2011 Census.
- 5.28 However, the wider context has been of changing market dynamics for smaller landlords/investors in recent years, with legislative and tax changes making the management of individual properties or small portfolios more challenging and eroding margins.
- 5.29 In this context, supporting institutional investment in the sector through build-to-rent development is important to maintaining supply and rental affordability (which in turn can help manage affordable housing pressures through addressing homelessness presentations).
- 5.30 Although the Local Housing Needs Assessment⁵ (LHNA) (2026) did not identify large-scale interest in Build-to-Rent in the district, it did recognise wider growth in demand for rental accommodation.

- 5.31 Such accommodation would help meet housing demand and provide tenure choice – particularly on large multi-phased sites. Wealden could help support growth in this sector, with a particular focus on the emerging ‘suburban’ or ‘single-family’ BTR sectors.
- 5.32 Savills reported in March 2025 that £2.5 billion was invested across the UK in single-family housing in 2024, with now 14,000 completed homes and a further 13,000 under construction.
- 5.33 The report identifies that suburban markets remain supply constrained and identifies potential for this market segment to deliver circa 32,000 homes per annum nationally. There is therefore the clear potential for suburban sites to contribute to delivery in these terms.
- 5.34 Iceni would recommend that the Council consider policies promoting the delivery of build-to-rent development as part of the larger schemes within the district (i.e. those providing over 500 dwellings) including committed phases.
- 5.35 It may be appropriate to review the consistency of the size threshold with that taken forward nationally by the Government.

Retirement & Other Specialist Housing Products

- 5.36 Wealden’s ageing population, high level of under-occupation (around 45% of households) and stock skewed towards larger detached and semi-detached homes point to a particular role for good-quality older persons’ and smaller “right-sizing” accommodation, which adds product diversity and can free up existing family housing.
- 5.37 In the context of this clearly identified and growing need, as well as the need for greater product diversity to build resilience in the housing trajectory, we consider that there is a strong case for working with site

⁵ <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/new-local-plan/planning-policy-evidence-base/housing/>

promoters as part of the plan-making process to encourage further provision of specialist housing – in particular as part of larger schemes which include local centres.

- 5.38 On such sites, the Council could consider making specific recommendations on the scale and range of specialist housing provision expected within site-specific policies.
- 5.39 The Council should also engage with site promoters on these issues as the plan-making process continues. Generally, greater certainty results in greater investment and quicker delivery.

Affordable housing and build-out

- 5.40 Affordable housing is a clear example of product differentiation that may increase build-out rates because affordable and market homes are taken up through different channels and so do not compete for the same buyers.
- 5.41 The LHNA evidence identifies an acute affordable need of 754 homes per annum, around 72% of which is for rented rather than ownership products — pointing in particular to the need for social rent.
- 5.42 If we assume a site selling at a steady market rate of 40 private homes per year (a rate set by local demand, not by policy). At 35% affordable housing, those 40 private sales sit alongside around 22 affordable homes, giving total delivery of around 62 homes a year; at 50% affordable, the same 40 private sales sit alongside 40 affordable homes, giving 80 homes a year — an uplift of around 21% in the annual build-out rate for the same market sales rate, because the additional affordable homes are delivered to a registered provider, or through grant, via a separate channel.
- 5.43 However, securing a registered provider to acquire a Section 106 affordable package has become more difficult in recent years. Providers

face capacity constraints and competing priorities, notably investment in their existing stock and building safety. Larger providers increasingly favour their own grant-funded delivery over purchasing Section 106 units.

- 5.44 A higher affordable requirement, therefore, depends on provider demand, grant availability, and wider capacity in the sector. The Council can improve the odds by encouraging developers to bring providers into partnerships early on larger sites and by pursuing grants to deliver affordable homes beyond the base policy.
- 5.45 There is also a viability trade-off. Affordable housing is provided subject to viability: a higher requirement reduces residual land value and developer return, and if set above what a site can support, it can deter sites from coming forward or slow delivery — the opposite of the intended effect.
- 5.46 As the LHNA notes, the amount delivered will be limited to what can viably be provided. The requirement should therefore be set to capture the absorption benefit while remaining deliverable based on viability evidence, and is most effective when paired with a grant.
- 5.47 This may mean considering different levels of affordable housing contributions in different parts of the district, with more viable locations seeking higher contributions of affordable homes.

Front-load infrastructure and place-making

- 5.48 The Council will need to examine as part of the plan-making process the interrelationships between infrastructure provision, the delivery of strategic development schemes and viability.
- 5.49 A Savills report on the Value of Placemaking shows that upfront investment in social and community infrastructure makes developments

more appealing and can positively affect both sales/delivery pace and residential values.

- 5.50 It particularly highlights the role of schools in supporting buyer demand. Such new schools can foster community buy-in and attract parents with new facilities and lower class sizes, at least initially.
- 5.51 The report, however, demonstrates that supporting this upfront investment requires ‘patient capital’, whereby essentially land is paid for over time rather than upfront, creating more financial capital to invest in place.
- 5.52 This can be assisted by public-sector co-investment (for example through Homes England grants) to help fund early infrastructure delivery and de-risk early delivery.

Resource and streamline the planning process

- 5.53 A step-change in delivery implies a step-change in planning activity, with a concentration of major applications around and after the Local Plan examination.
- 5.54 The Council will need adequate development-management capacity — supported by planning performance agreements and higher application-fee income — together with early, co-ordinated engagement with statutory consultees and infrastructure providers, including East Sussex County Council, the Environment Agency and Natural England, amongst others.
- 5.55 Given the sensitivity of Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), the early resolution of habitats and related issues will be particularly important to keeping applications, conditions and section 106 agreements moving.

Build realism and resilience into the trajectory

- 5.56 Finally, the trajectory should be realistic and defensible. Where early-years delivery is constrained — whether by current market conditions or by the district's environmental and landscape designations, including the Ashdown Forest SAC and SPA, the Pevensey Levels SAC and Ramsar site and the High Weald National Landscape — a phased trajectory that ramps up as strategic sites come on stream is justified, provided the overall requirement is met across the plan period.
- 5.57 Realistic lead-in times and build-out rates, a supply-side buffer above the requirement (of the order of 10% or more if possible), and the avoidance of over-reliance on a few sites together give the trajectory the resilience to absorb slippage.
- 5.58 Delivery responds to the level of growth planned for, and rates achieved elsewhere demonstrate what is possible where planning, land supply and infrastructure align. With an up-to-date plan, a diverse supply base and co-ordinated infrastructure investment, future delivery in Wealden can reasonably be expected to exceed what past data alone would suggest.

Considerations of the New NPPF

- 5.59 The August 2026 National Planning Policy Framework (NPPF) introduces a series of structural and policy changes intended to increase housing delivery across England. However, the Local Plan will be examined under the December 2024 NPPF. However, for decision-making, the new NPPF applies immediately.
- 5.60 Taken together, these new measures strengthen the plan-led system, including separate plan-making and decision-taking policies, significantly increasing the weight given to housing provision in both plan-making and decision-taking.

- 5.61 At the core of the new NPPF is a strengthened and broadened presumption in favour of sustainable development. This is now expressed through a set of new policies which establish a more explicit “default yes” approach to development in suitable locations.
- 5.62 While the Council has options around allocations, within settlement boundaries applications are to be approved unless adverse impacts substantially outweigh the benefits (Policy S4).
- 5.63 The NPPF now defines a settlement for national policy purposes — not limited to a boundary on a policies map, capable of including cities, towns, villages and other predominantly built-up areas together with allocated or permitted land that will become part of the built-up area, with plans able to identify settlements by boundaries or by criteria.
- 5.64 Split sites are assessed against S4 (within settlements) or S5 (outside settlements) for the relevant parts, making settlement boundaries and site composition increasingly important.
- 5.65 Outside settlements, Policy S5 (H1-4) permission should be granted to residential and mixed-use development which would:
- I. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B);
 - II. Be physically well-related to the station or the settlement within which the station is located;
 - III. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and
 - IV. Not prejudice any proposals for long-term comprehensive development in the same location.
- 5.66 The replacement of the tilted balance with Policies S3 to S6, which set default permissions for developments in different locations unless their harm substantially outweighs their benefits, represents a material shift towards approval in marginal cases.
- 5.67 Under Policy S5 of the new NPPF, a lack of five-year land supply and a low-scoring Housing Delivery Test (<75% (Wealden scores 89%))

automatically amounts to evidence of unmet housing need and any development outside settlement boundaries, which would address the evidenced unmet need should be approved unless any adverse effects would substantially outweigh the benefits of doing so.

- 5.68 However, such developments must be physically well-related to an existing settlement and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.
- 5.69 A further important strand emphasises using land more efficiently. The NPPF promotes higher densities in sustainable locations, seeking minimum densities of at least 35 dph, or 45 dph for higher-frequency stations, within a reasonable walking distance (around 800m) of a well-connected station (in the top 80 Travel to Work Area (TTWA) and with a frequency of at least 4 trains per hour). These are minimums rather than a range and should be exceeded where possible subject to the policy exceptions.
- 5.70 The top 80 TTWAs include Eastbourne and Tunbridge Wells TTWA, which cover most of Wealden. However, train frequency within Wealden means only Wadhurst, Pevensey, Westham and Polegate are included.
- 5.71 Additional support is provided for small sites and medium-sized sites (10–49 homes on sites up to 2.5 hectares), with a view to diversifying the market and accelerating build-out rates. Local plans are expected to allocate at least 10% of the housing requirement on sites of one hectare or less and a further 10% on medium sites. Policies relating to major development also apply to medium sites.
- 5.72 Notwithstanding this pro-delivery agenda, the NPPF maintains a strong framework for environmental protection. National Landscapes (formerly AONBs), National Parks and habitats sites such as SPAs and SACs continue to attract significant policy protection.
- 5.73 Major development within protected landscapes should be refused other than in the “exceptional circumstances” test, and proposals

affecting habitats sites must demonstrate no adverse effect on integrity unless strict derogation tests are met. The NPPF places greater emphasis on mitigation, compensation and plan-led solutions where there is conflict.

- 5.74 For Wealden District, these changes have clear implications. The continued starting point remains the materially increased housing requirement, set against a highly constrained environmental context including the High Weald National Landscape, the Ashdown Forest SPA/SAC and the Pevensey Levels SAC and Ramsar site.
- 5.75 The NPPF does not remove these constraints, but it does require the Council to demonstrate that all reasonable options for meeting need have been explored.
- 5.76 This points towards a spatial strategy focused on the least constrained and most sustainable parts of the district, particularly the main settlements and areas with good transport connectivity.
- 5.77 Development outside settlement boundaries, such as those identified herein, will be approved if they are within reasonable walking distance of a well-connected station, physically well-related to the station or the settlement within which the station is located, are of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and not prejudice any proposals for long-term comprehensive development in the same location. Such sites are likely to play an important role, particularly where the Council cannot demonstrate a robust five-year supply.
- 5.78 In practice, this is likely to mean a stronger emphasis on directing growth to locations in the Low Weald such as Pevensey, Westham and Polegate, alongside greater use of brownfield land and higher densities where appropriate.

- 5.79 At the same time, development within the most sensitive parts of the High Weald or affecting the integrity of the Ashdown Forest, Pevensey Levels or the South Downs National Park will remain tightly controlled.
- 5.80 There are also clear opportunities for the Council to take proactive steps to support delivery. These include ensuring that the evidence base demonstrates a comprehensive approach to site identification, which this document and the SHELAA achieve.
- 5.81 Furthermore, applying density expectations consistently to maximise capacity in sustainable locations and maintaining a strong, up-to-date strategy for mitigating impacts on environmental designations would also help increase delivery.
- 5.82 In addition, the Council can make greater use of policy tools to support build-out rates, including the management of large sites, support for small and medium-sized developers, and partnership working to bring forward stalled permissions.
- 5.83 The NPPF significantly strengthens the policy framework in favour of housing delivery, while retaining important environmental safeguards.
- 5.84 For a constrained authority such as Wealden, the challenge is demonstrating how it can be met as far as possible through a carefully targeted, evidence-led and design-sensitive spatial strategy, supported by active measures to accelerate delivery.

6. Approach to Windfall

- 6.1 This section reviews the council's approach to assessing windfall allowance. A windfall allowance can be included in a five-year housing land supply (5YHLS) even where the authority has undertaken a comprehensive SHELAA, but only where the allowance is evidenced, realistic, carefully filtered and demonstrably not double-counted.
- 6.2 National policy requires “compelling evidence” that windfalls will provide a reliable source of supply, and any allowance must have regard to the land availability assessment, historic windfall delivery rates and expected future trends.

Definition

- 6.3 The 2024 NPPF definition of windfall sites is broad: “sites not specifically identified in the development plan”. Authorities may include a windfall allowance only where compelling evidence shows such sites will provide a reliable source of supply, and the allowance must be realistic by reference to the land availability assessment, historic delivery, and expected future trends.
- 6.4 The PPG similarly recognises that a windfall allowance may be justified in anticipated supply, including in 5YHLS calculations, where that NPPF test is met. Separately, the December 2024 NPPF glossary continues to distinguish sites that are deliverable in principle from those requiring clear evidence that completions will begin within five years.
- 6.5 As windfall is considered to be an allowance, not a specific deliverable site schedule. Therefore, the allowance must sit alongside, and not duplicate, the sites included in the 5YHLS.
- 6.6 A comprehensive site assessment does not preclude a windfall allowance. However, it changes the evidential question from “have

windfalls happened before?” to “which types of sites are still genuinely outside the identified supply after the site review?”

- 6.7 East Hampshire’s 2025 paper⁶, for example, it expressly excludes allocations made in neighbourhood plan allocations and sites in the SHLAA to avoid double counting; it then concludes only small-site windfalls should be counted going forward.
- 6.8 For the Maidstone Local Plan⁷ the inspector’s reasoning is particularly useful. He found it reasonable to include windfall but accepted that the early years should be excluded to avoid double counting with extant planning permission, and that the allowance for large windfall should be reduced in the middle years.
- 6.9 That is the key logic for authorities with a recent comprehensive review, such as Wealden, i.e. use the SHLAA as a filter, not as a reason automatically to remove all windfall. In the case of Wealden, this would mean including small sites.

Current Wealden Approach

- 6.10 Appendix 2 of the Strategic Housing and Employment Land Availability Assessment⁸ (SHELAA) from January 2026, sets out the Council’s approach to Windfall.
- 6.11 Currently, the Council seeks to identify developments that fall into both small (1-5 dwellings) and large (6+ dwellings) windfall supply. This draws on completion data from 2011 to 2021.

⁶ [https://www.easthants.gov.uk/sites/default/files/2025-](https://www.easthants.gov.uk/sites/default/files/2025-10/Windfall%20allowance%20justification%20paper%202025.pdf)

[10/Windfall%20allowance%20justification%20paper%202025.pdf](https://www.easthants.gov.uk/sites/default/files/2025-10/Windfall%20allowance%20justification%20paper%202025.pdf)

⁷ <https://drive.google.com/file/d/1BpJD7DyWVbclC0QQ2pLhEY5o3hWXo1Mb/view>

⁸ <https://www.wealden.gov.uk/UploadedFiles/SHELAA-Jan-2026-Appendix-2-Windfall-Study.pdf>

- 6.12 Figure 2 of the Appendix breaks down the windfall supply by components. Components of the small site supply comprise Garden, Greenfield, and Previously Developed Land (PDL) development. Large sites are recorded in a single PDL category.
- 6.13 While the Council has undertaken several comprehensive site reviews, it is still justified in including a windfall allowance within its five-year housing land supply calculations.
- 6.14 This is because windfall is not a “plug” for sites missed by the SHELAA, Urban Capacity Study or Comprehensive Site Review; it is an evidence-based allowance for categories of sites that are either below the assessment threshold, arise unpredictably, or are not capable of being captured at the base date.

Double Counting

- 6.15 Inspectors are most concerned where a windfall allowance overlaps with supply already counted elsewhere. In Maidstone, the Inspector identified a risk of overlap between windfall and small unidentified sites within a town centre broad location.
- 6.16 The Reigate & Banstead methodology also illustrates the defensible counter-argument that even with a robust SHLAA, larger windfalls can arise unexpectedly, such as from a factory or public services closure.
- 6.17 In Reigate and Banstead, all large sites identified in the SHLAA and broad locations are subtracted from the windfall figures to avoid double counting. That approach is stronger than saying “the SHLAA cannot identify everything”; it shows which historical sources remain after removing identified supply.

Best Practice and Recommendations

- 6.18 Ultimately, the approach to housing land supply should be plan-led, and the windfall allowance should not undermine this by becoming a substitute for allocations.
- 6.19 For example, East Hampshire expects larger-site windfalls to decline because more sites are likely to be known and allocated in the emerging plan to meet higher housing need.
- 6.20 The Maidstone Inspector accepted windfall on brownfield sites but emphasised that the allowance may need adjustment in later reviews as monitoring and future trends change, and that future site identification in plan review may reduce the windfall component.
- 6.21 Given that the current windfall component in Wealden is derived from 2011 to 2021 trends, it may be an opportune time to update this to more recent data.
- 6.22 Generally, small-site windfalls are usually compatible with a plan-led approach, while large-site windfalls require a much more cautious and source-specific justification.
- 6.23 This is not currently the case in Wealden, and the broad large-windfall allowance makes the Council vulnerable unless it can identify why the source is genuinely unpredictable, why it has not been counted elsewhere, and why it is likely to continue.
- 6.24 The Council has identified a need to review how it monitors data and this will lead to improved windfall calculations.
- 6.25 The database update will also allow the council to create an “audit trail” showing what has been removed. This will also allow them to differentiate by site size and source, because small infill, office conversions and large brownfield redevelopment have different reliability profiles.

- 6.26 When developing trends, the Council should remove adopted allocations, emerging allocations, SHELAA/UCS/CSR identified sites, broad locations, abnormal strategic sites, rural exceptions, and greenfield speculative permissions won on appeal if current policy would not permit them.
- 6.27 An easy win for the Council is to count only sites not specifically identified in the development plan, then exclude all sources already counted as commitments, allocations or identified supply.
- 6.28 Where possible, the Council should use net completions, not gross permissions, unless a permission-based method is adjusted by local implementation/lapse evidence.
- 6.29 As a default, the Council should not include a windfall allowance in years 1–3 where small/medium commitments are already captured in likely completions.
- 6.30 The Council should also set out any assumption which might increase or decrease windfall from past trends. For example, including prior approval changes for office-to-residential only for the post-COVID period, or whether settlement boundary changes will allow further windfall to occur.
- 6.31 Another reasonable approach for the Council is to include some sensitivity testing to demonstrate the differences in assumptions. For example, the result using recent 5-year and longer-term averages, with and without large sites, with and without prior approvals, and with/without garden intensification.
- 6.32 This also helps demonstrate that the 5YHLS position is not dependent on the most optimistic windfall assumption and directly addresses appeal scrutiny on double counting and reliability.
- 6.33 Small sites are generally the most defensible windfall category because they are often below SHELAA/UCS/CSR thresholds and arise

continuously through infill, conversion, subdivision and small redevelopment.

- 6.34 As the SHELAA threshold is 5 dwellings, a small-site allowance can be justified if it is based on net completions, excludes allocations or commitments, and is not applied in years already covered by permissioned supply.
- 6.35 If a large-site allowance is used, the Council should confine it to specific, unpredictable sources such as office-to-residential, non-residential closures, or institutional land, and subtract anything identified in the SHELAA/UCS/CSR, brownfield register, allocations, or current commitments.
- 6.36 Urban windfalls are generally easier to evidence because conversions, vacant commercial premises, flats above shops, garage courts and small infill can be shown as recurring sources.
- 6.37 These sources were identified within the urban capacity study, so should therefore be treated with caution, and double-counting should be avoided.
- 6.38 Reigate & Banstead's source-based methodology is particularly useful in fragmented urban areas where small-scale redevelopment is a regular feature of the housing market.
- 6.39 The 2024 NPPF no longer defined windfall as only previously developed land, and Tonbridge & Malling notes that the revised definition is broader than the 2012 version.

- 6.40 However, the NPPF still states that local plans should consider policies to resist inappropriate development of residential gardens where it would cause harm, and Reigate & Banstead adopted a conservative approach by excluding residential intensification from its allowance.
- 6.41 The Council should not rely on garden intensification unless the emerging local policy explicitly supports it and the authority can show it is not harmful, not double-counted, and likely to continue. A conservative sensitivity excluding garden development is advisable.
- 6.42 The table below summarises these considerations when developing a windfall allowance.

Table 6.1 Recommendations on Robust Approach

Methodological issue	Robust approach	Weak/vulnerable approach
Historic period	Use a sufficiently long monitoring period to capture economic cycles but compare with recent trends. Continuing to use data from 2011 should be robust.	Use a single long average without testing whether recent delivery has fallen or whether old conditions still apply.
Data basis	Use net completions, with losses/demolitions accounted for.	Use permissions or gross approvals without lapse/implementation adjustment.
SHELAA/ UCS/ CSR interaction	Remove allocations, commitments, identified sites, broad locations and other counted supply.	Count historic windfalls that are now identified sites in the SHELAA.

Site size	Split small, medium and large sites; apply different assumptions.	Apply a single blanket rate to all windfalls, regardless of size or volatility.
Large sites	Only include if source-specific evidence shows regular, unpredictable supply; discount heavily. Tonbridge & Malling uses only 5% of the large-site historic average.	Assume historic large greenfield speculative permissions will continue after plan adoption or after the comprehensive site identification processes.
First years	Exclude at least years 1–2, and often year 3, where permissions/commitments are already captured in likely delivery.	Include a full windfall allowance in year 1 despite existing small-site commitments.
Future trends	Explain policy/market effects: office-to-residential conversions, settlement boundary changes, environmental constraints, and changes in plan	Assume the past will continue, regardless of policy changes or constraints.

6.43 The examples below focus on windfall methodology produced by different local authorities in the South East. Wealden could also draw on these examples.

Table 6.2 Best Practice Examples of Windfall

	Windfall approach	Practical lesson
South Oxfordshire, January 2025 5YHLS statement⁹	Uses 13 years of data, splits major/minor, brownfield/greenfield and previous use; excludes greenfield major windfalls from the projection because higher past delivery was linked to Core Strategy out-of-date / land supply circumstances	Strong because it explains why some historic windfall sources should not be carried forward.
Hart, 1 April 2025 5YHLS statement¹⁰	Uses 2014–2025 completions, removes allocated sites, settlement extensions and rural exception sites, distinguishes between general and prior-approval windfalls, applies discounts.	Strong because it cleanses the dataset and discounts volatile sources.

⁹ https://www.southandvale.gov.uk/app/uploads/sites/2/2025/01/2025-01-17-Final-South-5YHLS-Report_DM-combined.pdf

¹⁰ <https://www.hart.gov.uk/sites/default/files/2025-12/Five-Year-Housing-Land-Supply-at-1-April-2025.pdf>

East Hampshire, October 2025 windfall allowance paper¹¹	Excludes allocations and all current/previous LAA sites; concludes small-site windfall remains reliable, but minor/large windfalls should not be included because larger sites are more likely to be identified/allocated	Very useful where a comprehensive SHLAA has been completed.
Bracknell Forest, April 2023 HLS note¹²	Uses small-site and medium-site windfall; includes small sites and medium sites, phased to avoid double counting; discounts prior-approval office conversions by 75%; and includes no large-site allowance.	Appeal-tested, and the Westwood House Inspector endorsed the approach as precautionary.
Tonbridge & Malling, 2025 Windfall Topic Paper¹³	Uses 2008/09–2024/25 data; small windfall is the average; large windfall is based on the historical average, but only 5% is carried forward; the windfall begins in year 3 to avoid double counting.	Useful for showing a heavily discounted large-site component, though the 5% figure needs a clear local explanation if used.

¹¹ [https://www.easthants.gov.uk/sites/default/files/2025-](https://www.easthants.gov.uk/sites/default/files/2025-10/Windfall%20allowance%20justification%20paper%202025.pdf)

[10/Windfall%20allowance%20justification%20paper%202025.pdf](https://www.easthants.gov.uk/sites/default/files/2025-10/Windfall%20allowance%20justification%20paper%202025.pdf)

¹² <https://www.bracknell-forest.gov.uk/sites/default/files/2024-01/hls-note-april-2023-updated-jan-2024.pdf>

¹³ <https://www.tmbc.gov.uk/downloads/file/4226/windfall-allowance-topic-paper>

Reigate & Banstead, windfall allowance paper¹⁴	Breaks windfall into sources: non-residential, conversions/flats above shops, garage courts, and residential intensification; excludes residential intensification as a cautious response to garden-policy uncertainty; subtracts SHLAA/broad-location large sites.	Strong source-by-source structure, especially for urban authorities.
Maidstone Local Plan Examination	Inspector accepted brownfield windfall evidence, accepted excluding early years to avoid commitments, and accepted reducing later/middle-year in large windfalls because SHLAA/allocation work identified many potential sites.	Best inspection example for how to handle windfalls after a comprehensive site review.

Pitfalls

- 6.44 There are also a few examples which the Council should try to avoid. For example, using historic greenfield speculative delivery from periods of under-supply or outdated policy as if it will continue under an up-to-date plan.

¹⁴ https://www.reigate-banstead.gov.uk/downloads/file/50/appendix_5_-_determining_a_windfall_allowance

- 6.45 If recent averages are falling, then this should also be reflected in the approach. Relying on a single long-term metric that masks recent declines can be unreliable. Gravesham's approach, for example, illustrates the need to test whether older high-delivery years still reflect current trends.
- 6.46 The Council should also avoid applying generic national lapse rates where local, category-specific implementation evidence is available. Local rules of thumb always trump national ones.
- 6.47 Similarly, a more conservative approach to windfall is generally more welcome. This may mean ensuring significant discounts are applied, particularly to volatile categories such as prior approvals and large windfalls.
- 6.48 Bracknell's 75% discount to office-to-residential prior approvals and Hart's discounts to general/prior-approval windfalls are useful precedents.
- 6.49 If relying on future trends such as settlement boundary changes, identify them but avoid increasing the allowance unless the evidence is strong. East Hampshire, for example, notes that settlement boundary changes may increase opportunities but do not increase the allowance for that reason.