

Wealden
District Council

Strategic Housing and Employment Land Availability Assessment (SHELAA) Appendix 2

September 2026

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1. Introduction

1.1. The purpose of the Windfall Study is to provide the evidence base to support the proposed windfall allowance in the Council's Housing Trajectory as part of its Proposed Submission Wealden Local Plan (Regulation 19). The study will examine past trends of housing delivery on windfall sites in Wealden District and estimate future housing land supply from this source.

1.2. The study records and examines past trends of housing delivery on windfall sites from 2014/15 to 2025/26 (thereafter known as 'the monitoring period'). It analyses the level of development identified in the Council's housing trajectory and the possible future economic trends over the study period.

1.3. It should be noted that the Covid-19 pandemic may have affected the delivery of housing completions from 2019.

1.4. Likely levels of housing delivery from windfall sites into the future are estimated, building on previous work in Authority Monitoring Reports (AMRs) and the Strategic Housing and Economic Land Availability Assessment (SHELAA). These estimations are then used to propose a windfall allowance for the Housing Trajectory. Any decision on the inclusion of a windfall allowance will be made through the Plan making process.

2. Definition of Windfall Sites

2.1. Windfall sites are defined in the NPPF (December 2024) within Annex 2: Glossary as "sites not specifically identified in the development plan". Windfall sites in the district are therefore those housing sites that are delivered without being allocated in the Development Plan.

2.2. Paragraph 75 of the NPPF confirms that "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply". It goes onto state that "any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area".

2.3. The PPG[1] sets out how a windfall assessment can be determined as part of the SHELAA process. It states that "a windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 [now paragraph 75] of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance

[1] Housing and Economic Land Availability Assessment, Paragraph: 023 Reference ID: 3-023-20190722

(using the same criteria as set out in paragraph 67 [now paragraph 72] of the National Planning Policy Framework)".

2.4. Most windfall sites are on Previously Developed Land (PDL) and/or are located within a development boundary of a settlement (i.e. within the built-up area). In most cases, they do not require allocation through the development plan process (unlike larger sites or those outside of the settlement boundaries) and so are only identified when they come forward through the planning application process. Occasionally, unused 'green' land within built-up areas (including residential gardens) are developed for housing and this would also be considered as a 'windfall' site, if it is not formally allocated.

3. Windfall sites as a source of Housing Land Supply

3.1. Windfall sites are normally legitimate development sites that comply with planning policy, but due to unforeseen local circumstance have come forward on previously developed land and/or within settlement boundaries. They make an important contribution to housing land supply as they deliver a flexible level of housing year-on-year in addition to planned development opportunities. The sites may unexpectedly come forward for various reasons, including a change in circumstances for the site or owner, business relocations or closures, distressed sales and the demolition of existing buildings. Small sites of less than 5 (net) dwellings are not assessed in the SHELAA but consistently come forward for development within the district, creating a steady supply of small windfall sites.

3.2. The amount and location of housing delivered on windfall sites each year is flexible by its nature and so difficult to predict or make an allowance for in the Housing Trajectory. For this reason, this windfall assessment aims to proactively identify these unallocated and unexpected windfall sites to provide a better estimate of where and when they might come forward for housing. They are identified through current or pending planning permissions, a 'call for sites', a survey of vacant and derelict land and buildings, redevelopment opportunities and analysis of pre-application enquiries to the Council. The housing potential of these sites is determined by discussions with the landowners or developers and an assessment of the site's suitability and market viability. The aim of the SHELAA is to minimise the uncertainty of windfalls and identify when and where they are likely to come forward in the Housing Trajectory.

3.3. Many sites with planning permission were not previously allocated in the development plan and were therefore windfall sites. Once they gain planning permission, they become 'commitments' and are counted separately within the Council's Five-Year Housing Land Supply Statement.

Avoiding duplication

3.4. The SHELAA helps to support the Housing Trajectory by identifying sites that would have previously come forward as unexpected windfall sites, including 'commitments' with planning permission. However, when estimating a 'windfall allowance', the sites identified and allocated for suitable development in the SHELAA must be discounted to avoid 'double counting' over the same time periods.

3.5. The NPPF does allow for windfall sites to be included in a Local Plan housing trajectory if compelling local evidence is provided and double counting is avoided. Therefore, a windfall estimate can be produced for large and small windfall sites for years 4 and 5 following the Local Plan adoption (normally planning permissions are extant for 3 years) and the period beyond, and any sites identified in the SHELAA or as commitments with planning permission must be discounted from this figure to provide a robust windfall allowance in the Housing Trajectory.

4. Methodology

4.1. The NPPF (December 2024) and the PPG have been used to undertake this Windfall Study. The Study considers the following issues:

- Records historic windfall completion rates;
- Examines the results over the Study Period;
- Analyses historic trends; and
- Estimates future housing delivery from windfall sites, considering:
    - whether the annual windfall completion rate is likely to increase or decrease;
    - whether the pattern of redevelopment is likely to remain the same, grow or decline; and
    - The impact of future market conditions.

4.2. The Windfall Study uses net housing completion figures from 1 April 2014 to 31 March 2026. This date was chosen as it sufficiently covers a 12-year monitoring period to consider the latest trends. The assessment also excludes sites within the South Downs National Park (SDNP), as the South Downs National Park Authority (SDNPA) have prepared a Plan for the Authority area.

4.3. "Small sites" deliver 1-4 net units. "Large sites" deliver 5 or more net units.

4.4. The PPG requires plan-makers to review housing trajectories and assess the risk of sites not coming forward as anticipated. Consequently, windfall allowances should be monitored and adjusted where delivery diverges from

expectations[2]. The AMR will contain information on the actual supply of windfall sites on an annual basis.

5. Small sites

Net completions

5.1. Table 1 below shows that there has been continuous supply of windfall growth historically, arising from smaller completions of 4 or less dwellings. In eleven of the twelve monitoring years, such growth has exceeded 100 dwellings per annum (dpa). The total growth over this 12-year period is 1,616.

Table 1: Net windfall completions from all sites of four or less units by year (2014/15 – 2025/26)

Year	Completions on Schemes of 4 or Less Units	Completions on larger sites	Total Completions	% Completions
2014-2015	77	500	577	13.34%
2015-2016	134	386	520	25.77%
2016-2017	123	441	564	21.81%
2017-2018	113	349	462	24.46%
2018-2019	167	674	841	19.86%
2019-2020	115	919	1,034	11.12%
2020-2021	108	616	724	14.92%
2021-2022	106	579	685	15.47%
2022-2023	304	836	1,140	26.67%
2023-2024	139	847	986	14.10%
2024-2025	112	981	1093	10.25%
2025-2026	118	1,088	1,206	9.78%
Total	**1,616**	**8,216**	**9,832**	**16.44%**
Average	**134**	**684**	**819**	**16.36%**

5.2. Overall, windfall growth from sites delivering 4 dwellings or less has accounted for over 16% of growth over the monitoring period, which is a substantial contribution towards the growth need of the district. The total of small site windfall completions has kept generally steady since 2015-16, with a significant increase in 2022-23 likely as an aftermath of Covid-19.

[2] Housing and Economic Land Availability Assessment, Paragraph: 024 Reference ID: 3-024-20190722

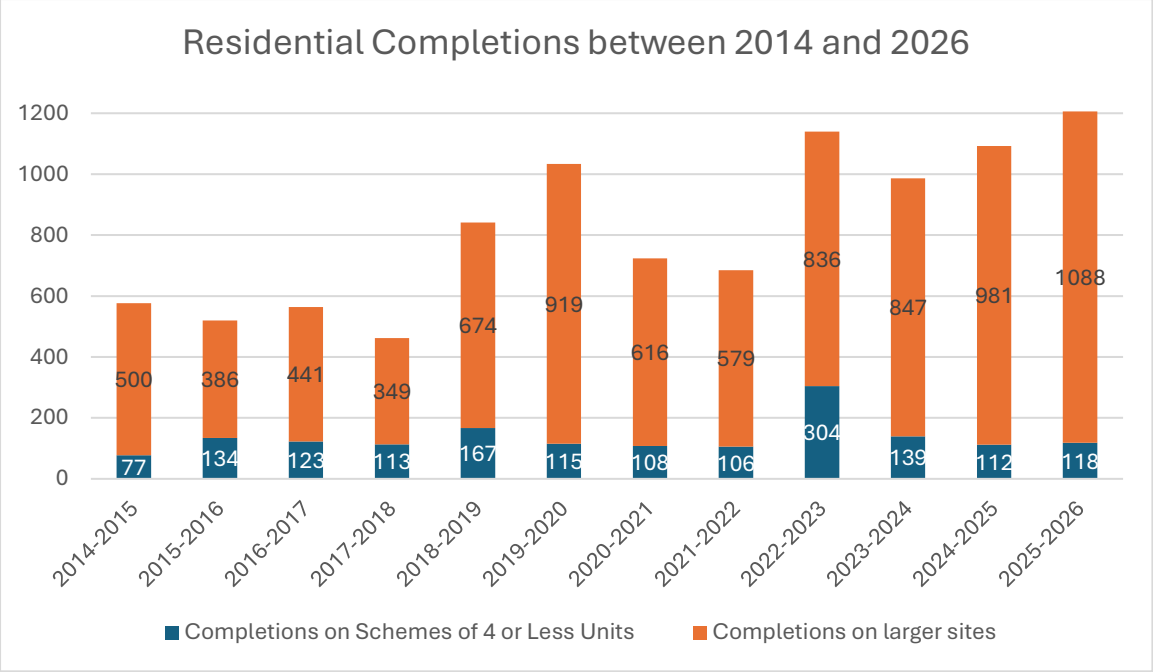


Figure 1: Residential completions from 2014 to 2026

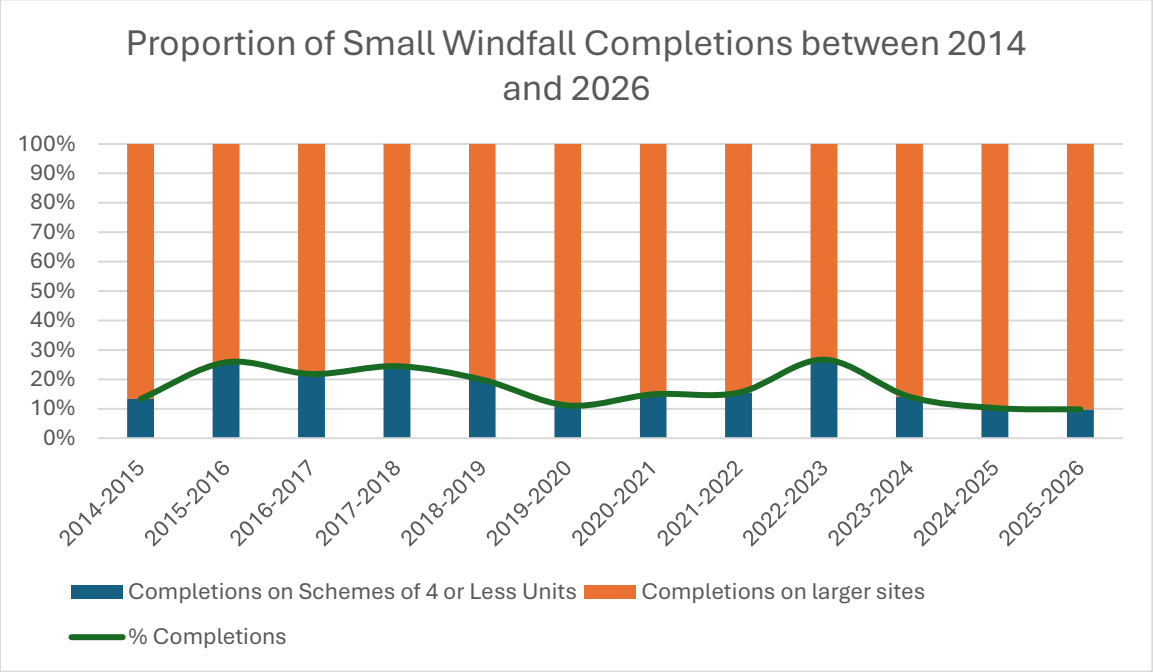


Figure 2: Proportion of small windfall completions from 2014 to 2026 with overall trend

Policy narrative

5.3. Over the monitoring period, as set out in Figure 3, the planning policy landscape changed which may provide some background to level of windfall across Wealden District, outside the South Down National Park, and support comparable trends over the new Local Plan period to 2042.

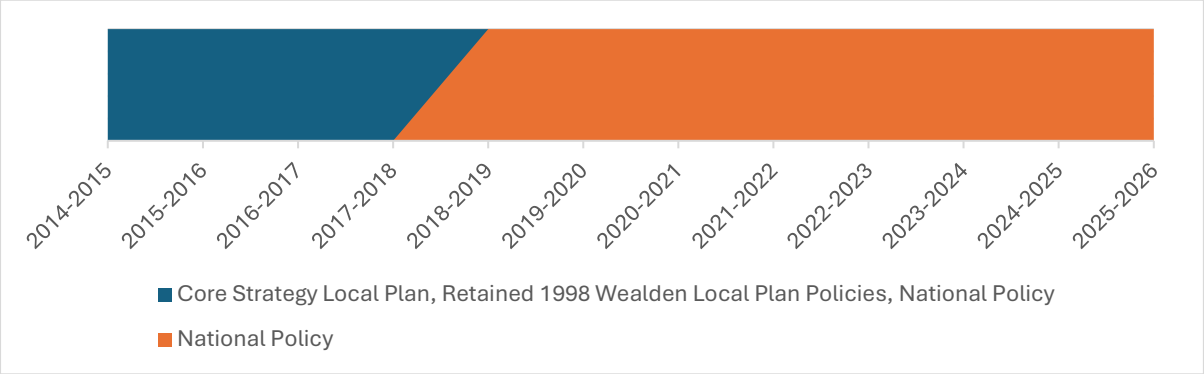


Figure 3: Evolution of the planning policy context over the monitoring period

5.4. The first four years of the monitoring period overlapped with the five years following the adoption of the Wealden District Core Strategy Local Plan in 2013. The Wealden District Core Strategy Local Plan comprises a long-term spatial vision and strategic objectives for the Wealden District area for the period 2013 to 2027. Importantly, it set out a yearly housing number (450 dpa) fixed for the first 5 years following adoption and directed growth towards urban areas, especially Hailsham and Uckfield, as well as some rural area assessed as suitable to accommodate some further housing development in an appropriate fashion. The Wealden District Core Strategy Local Plan did not include formal allocations. Rather it provided a broad distribution of land to be allocated as part of subsequent development plan documents.

5.5. With regard to windfalls specifically, strategic policy WCS2 of the Wealden District Core Strategy Local Plan made no allowance for windfall sites, although the historic contribution from windfall sites was acknowledged. Nevertheless, it included a full review of development boundaries across the plan area which resulted in the removal of development boundaries around 25 settlements, retaining or creating boundaries for 19 settlements[3]. Where the Wealden District Core Strategy Local Plan noted that within the development boundaries the principle of development is acceptable, it also set out circumstances where development could occur outside those boundaries primarily to that required to meet an essential rural need, support rural diversification and sustainability of the countryside, promote

[3] Buxted, Crowborough, Frant, Forest Row, Groombridge, Hailsham, Hartfield, Heathfield, Herstmonceux, Horam, Mayfield, Ninfield, Pevensey Bay, Polegate, Rotherfield, Stone Cross, Uckfield, Wadhurst, Westham

tourism or enhance the countryside, relying on national policy and retained Local Plan policies.

5.6. Upon the five-year anniversary of the adoption of the Wealden District Core Strategy Local Plan, the Plan became out of date and the presumption in favour of sustainable development prevailed across Wealden District in line with National Policy.

5.7. The Proposed Submission Wealden Local Plan (Regulation 19) published in September 2026 has also influenced the planning policy context during the latter part of the monitoring period. In preparation of the new Plan, the Council has undertaken a comprehensive review of settlement development boundaries across the district and has published development management policies to guide the determination of planning applications. The emerging policy framework provides updated criteria for assessing development proposals, including matters such as design quality, landscape character, biodiversity, climate change, infrastructure provision and the protection of the countryside. While the Proposed Submission Wealden Local Plan (Regulation 19) has not yet formed part of the statutory development plan during the monitoring period, its progression has provided an increasingly up-to-date policy context against which development proposals, including windfall sites, have been considered.

Historic Trend Analysis

5.8. As directed by the PPG, the data set out in Table 2, as well as in earlier parts of this report, are used to identify trends in the delivery of small windfall sites and estimate the future supply of windfall sites. This ‘windfall allowance’ can be used to support a robust Housing Trajectory.

Table 2: Comparison of the proportion of the location of completions on small sites between 2014 and 2026 in relation to development boundaries between the Wealden District Core Strategy Local Plan and the Proposed Submission Wealden Local Plan (Regulation 19)

Year	Within settlement with development boundary under the Core Strategy Local Plan	Outside development boundary under the Core Strategy Local Plan	% of completion within settlement with development boundary under the Core Strategy Local Plan	Within settlement with development boundary under the Draft Local Plan	Outside development boundary under the Draft Local Plan	% of completions within settlement with development boundary under the Draft Local Plan	All small sites completions
2014-2015	56	21	72.73%	59	18	76.62%	**77**
2015-2016	75	59	55.97%	84	50	62.69%	**134**
2016-2017	49	74	39.84%	57	66	46.34%	**123**
2017-2018	32	81	28.32%	40	73	35.40%	**113**
2018-2019	79	88	47.31%	85	82	50.90%	**167**
2019-2020	45	70	39.13%	48	67	41.74%	**115**
2020-2021	54	54	50.00%	60	48	55.56%	**108**
2021-2022	58	48	54.72%	78	28	73.58%	**106**
2022-2023	149	155	49.01%	176	128	57.89%	**304**
2023-2024	76	63	54.68%	88	51	63.31%	**139**
2024-2025	56	56	50.00%	72	40	64.29%	**112**
2025-2026	70	48	59.32%	87	31	73.73%	**118**
Totals	**799**	**817**		**934**	**682**		**1616**
Average	**66.6**	**68.1**	**49.44%**	**77.8**	**56.8**	**57.78%**	**134.6**

5.9. Table 2 shows that the monitoring year 2014/2015 saw a relatively low level of completions on small sites. However, there has been steady delivery since 2015/2016 with ranges from 106 dpa to 167 dpa, with exceptionally high completions in 2022/2023 of 304 dwellings.

5.10. Figure 4 shows that this pattern is not consistent with the total number of housing completions each year. The overall housing completions were largely in line with, although slightly above, the requirement set out in the Wealden District Core Strategy Local Plan fixed at 450 dpa until it became out-of-date, in 2018, five years after its adoption. Housing completions subsequently increased reflecting the lack of 5-year housing land supply in Wealden. Lower overall completion rates were recorded in 2020/2021 and 2021/2022 following the Covid-19 pandemic. However, the supply from small sites remained above 100 dpa during the same period, indicating a resilience of supply from this specific source. It should be noted that supply from small sites during those two years were only marginally lower than in previous years. It suddenly jumped in 2022/2023 and recovered pre-covid-19 levels from 2023/2024 onwards.

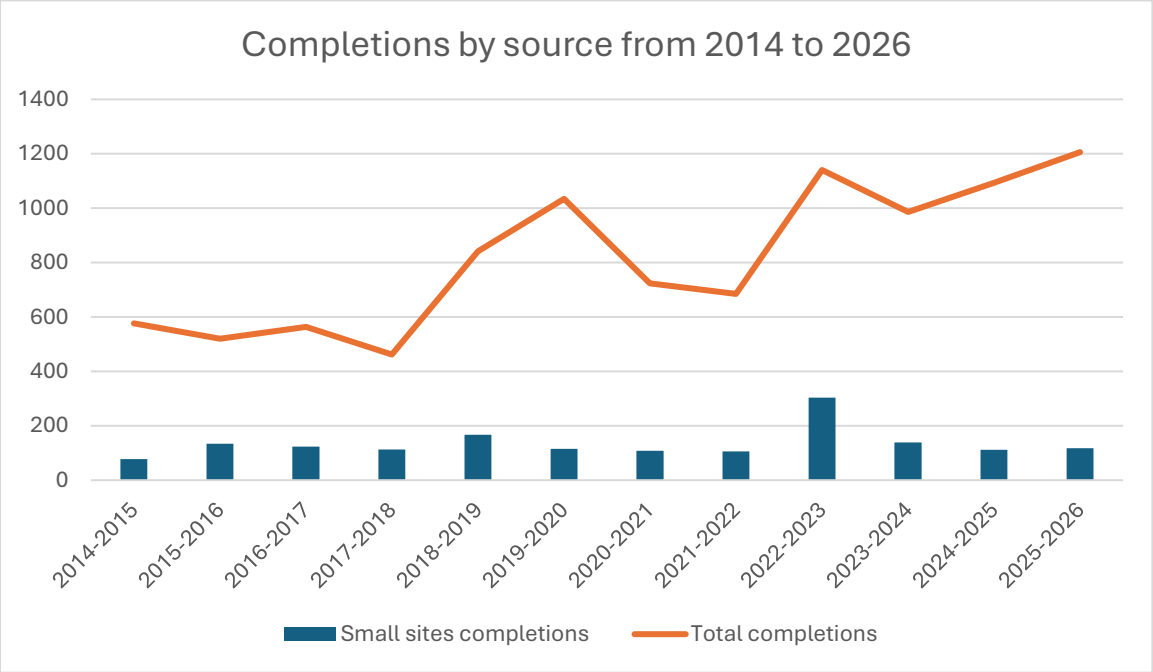


Figure 4: Completions by source between 2014 and 2026

5.11. Considering the rationale to development boundary approach proposed within the new Local Plan described in the previous section of this report (i.e. based on sustainability of settlements), it is most appropriate to consider the location of small sites over the monitoring period.

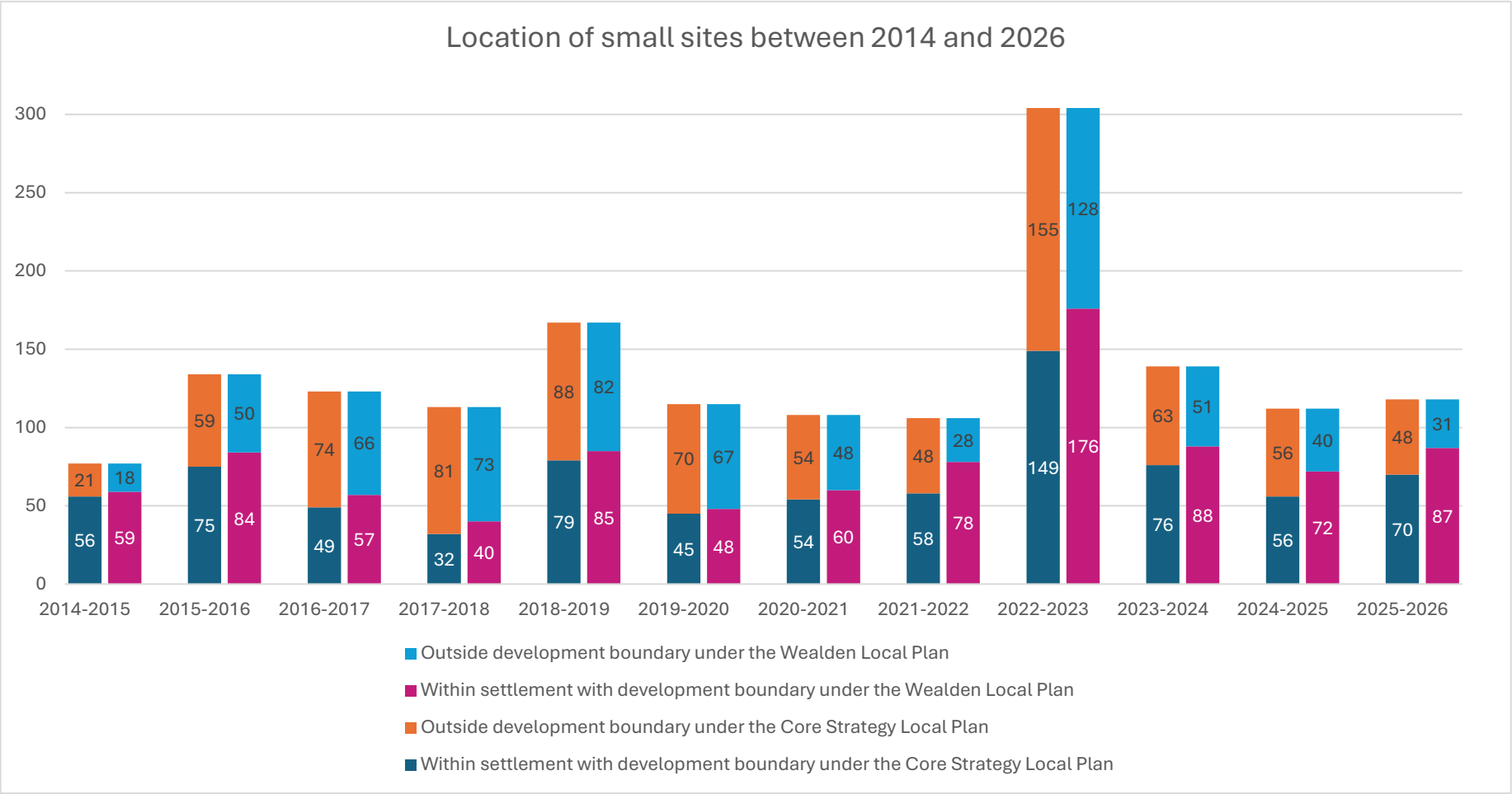


Figure 5: Comparison of the location of completions on small sites between 2014 and 2026 in relation to development boundaries between the Core Strategy Local Plan and the Proposed Submission Wealden Local Plan (Regulation 19)

5.12. As set out visually in Figure 5, just under 50% of small sites completions over the monitoring period occurred within settlements with development boundaries as defined within the Core Strategy Local Plan. Over the same time period, 57.78% small sites completions occurred within settlements with development boundaries as proposed within the Proposed Submission Wealden Local Plan (Regulation 19). This suggests that the introduction of further development boundaries across the district coupled with the enlargement of existing ones is likely to result in the ongoing delivery of further small sites across the plan area.

Estimation of future windfall delivery

5.13. The result of the analysis shows that there has, historically, been a continual, steady supply of completions coming forward on smaller sites of less than 5 units, contributing to 1,616 dwellings over the period 2014-2026 and an average of approximately 134 dpa. Small sites completions equate to around 16.44% of all new completions on an annual basis. It is considered that this has provided a reliable source of growth, with the trend being that each year, smaller scale windfall completions have made a substantial contribution to annual completions. Such sources of supply are likely to continue over the plan period. However, it seems most relevant to provide separate estimates within and outside development boundaries.

5.14. As the Proposed Submission Wealden Local Plan (Regulation 19) will continue to consider development within the development boundaries acceptable in principle, it seems most relevant to refine the estimate for small sites to areas with and without development boundaries.

5.15. The review of development boundaries as part of the Proposed Submission Wealden Local Plan (Regulation 19) will result in both:

- an increase of the size of the existing development boundaries to account for developments which occurred since the last review of development boundaries, which will encompass proposed housing allocations, and incorporate smaller parcels of land due to their location; and
- the addition of development boundaries for 15 settlements[4].

5.16. Such an approach will result in further areas where development would be acceptable in principle. This will likely create additional capacity for the provision of small sites.

5.17. In addition, the national planning policy context also evolved over the monitoring period through successive revisions to the National Planning

[4] Bells Yew Green, Berwick Station, Blackboys, Broad Oak, Cross in Hand, East Hoathly, Five Ash Down, Framfield, Isfield, Laughton, Lower Horsebridge, Maresfield, Nutley, Pevensey, Willingdon

Policy Framework (NPPF). The NPPF (December 2024) places significant emphasis on boosting the supply of homes, maintaining an effective plan-led system and supporting sustainable development. In circumstances where Local Plans are absent or out of date, national policy continues to give increased weight to the presumption in favour of sustainable development. Together, these changes have provided a supportive policy framework for the delivery of housing and may have contributed to the level of windfall development recorded across the district during the latter part of the monitoring period. This will only be exacerbated through the latest NPPF (2026).

5.18. On this basis, it is expected that the level of small site completions within settlements benefiting from development boundaries would remain at least similar, and possibly higher. However, it is prudent to discount windfall projections so as not to overstate their importance to overall supply. On this basis, it is considered appropriate to apply a discount of 10% to account for future uncertainties[5].

5.19. The data reveals that completions on small sites in settlements within development boundaries under the Wealden District Core Strategy Local Plan have contributed to the provision of 799 homes over the monitoring period and an average of 66 dwellings per annum, equating to 49.44% of small completions. To account for any years with exceptionally low or high completions and to avoid these skewing the assessment of the future potential from this source of supply, the 'truncated mean' has been calculated. This calculates the mean value of completions with outliers removed (in this case the highest and lowest annual small site completions figure within development boundaries under the Wealden District Core Strategy Local Plan were removed). The truncated mean equates to 61 dwellings per annum. Applying the same approach to the dataset in line proposed with the Proposed Submission Wealden Local Plan September 2026), small sites in settlements within development boundaries contributed to the provision of 934 homes over the monitoring period and an average of 77 dwellings per annum, equating to 57.78% of small completions. The truncated mean (in this case the highest and lowest annual small site completions figure within development boundaries under the Proposed Submission Wealden Local Plan (Regulation 19) were removed) equates to 71 dwellings per annum.

5.20. A 'small site' within development boundaries windfall allowance of 63 dwellings per annum (a 10% discount from 71) is a locally evidenced informed figure that could be used to indicate future supply in the plan area. Within the trajectory an allowance of 63 dpa is applied from year 1.5. Excluding the first 18 months avoids the risk of double counting completions

[5] It is noted that a 20% discount is commonly applied. The Council supports a differing approach noting that development boundaries have been untouched in Wealden for over 13 years and that significant changes are being proposed as part of the Proposed Submission Wealden Local Plan (Regulation 19).

with sites with extant permissions that will be delivered within 18 months of grant of planning permission, as a result of the implementation of the Housing Action Plan[6] in Wealden District.

5.21. Looking at small sites outside development boundaries, a significantly more cautious approach is proposed to reflect the change proposed to the planning policy landscape upon adoption of the Proposed Submission Wealden Local Plan (Regulation 19), September 2026). A 60% discount of the overall provision is proposed to be applied on this basis due to the likely more limited opportunities to deliver such sites upon the adoption of the Proposed Submission Wealden Local Plan (Regulation 19, noting that the Council will secure a five-year housing land supply position and that policies will only allow provision of homes outside the development boundaries under specific circumstances.

5.22. Completions on small sites outside development boundaries under the Core Strategy Local Plan have contributed to the provision of 817 homes over the monitoring period and an average of 68 dwellings per annum. The truncated mean (in this case the highest and lowest annual small site completions figure within development boundaries under the Core Strategy Local Plan were removed) equates to 64 dwellings per annum. Applying the same approach to the dataset in line with the Proposed Submission Wealden Local Plan, small sites outside development boundaries contributed to the provision of 682 homes over the monitoring period and an average of 56 dwellings per annum. The truncated mean (in this case the highest and lowest annual small site completions figure within development boundaries under the Proposed Submission Wealden Local Plan were removed) equating to 53 dwellings per annum.

5.23. A ‘small site’ outside development boundaries windfall allowance of 19 dwellings per annum (60% discount from 682 across 14.5 years) is proposed. Within the trajectory an allowance of 19 dpa is applied from year 1.5. Excluding the first 18 months avoids the risk of double counting completions with sites with extant permissions that will be delivered within 18 months of grant of planning permission, as a result of the implementation of the Housing Action Plan in Wealden District.

6. Large sites

Net completions

6.1. Table 3 has been extracted from the Council’s February 2024 Windfall Housing Study which shows the proportion of completion on windfall sites

[6] Wealden District Housing Action Plan

on previously developed land providing 6 and more dwellings between 1 April 2011 and 31 March 2021.

Table 3: Net windfall completions from previously developed land providing 6 or more dwellings by year (2011/12 – 2020/21)

Year	Completions on previously developed land providing 6 or more dwellings	Total Completions	% Completions
2011-2012	80	619	12.92%
2012-2013	22	673	3.27%
2013-2014	63	560	11.25%
2014-2015	29	577	5.03%
2015-2016	60	520	11.54%
2016-2017	116	564	20.57%
2017-2018	-42	462	-9.09%
2018-2019	81	841	9.63%
2019-2020	-4	1034	-0.39%
2020-2021	101	724	13.95%
Total	**506**	**6574**	**7.70%**
Average	**51**	**657**	**7.76%**

6.2. It shows that between 2011 and 2021, previously developed land providing 6 or more dwellings have delivered on average 51 dpa and have account for 7.76% of all completions within Wealden.

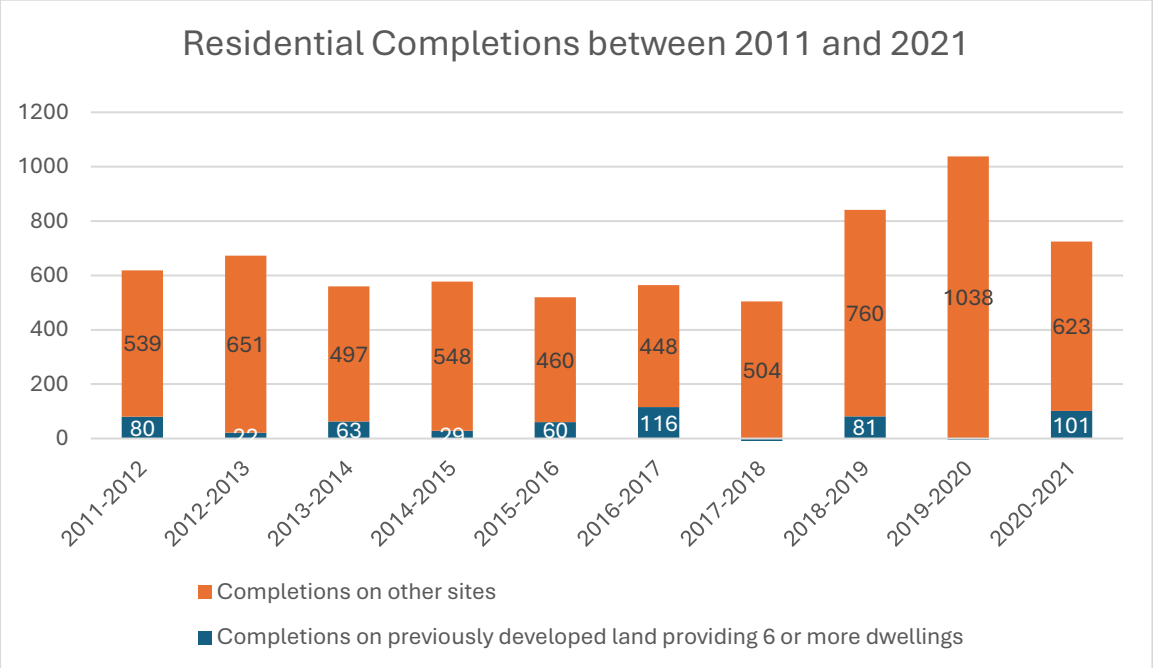


Figure 6: Residential completions from 2011 to 2021

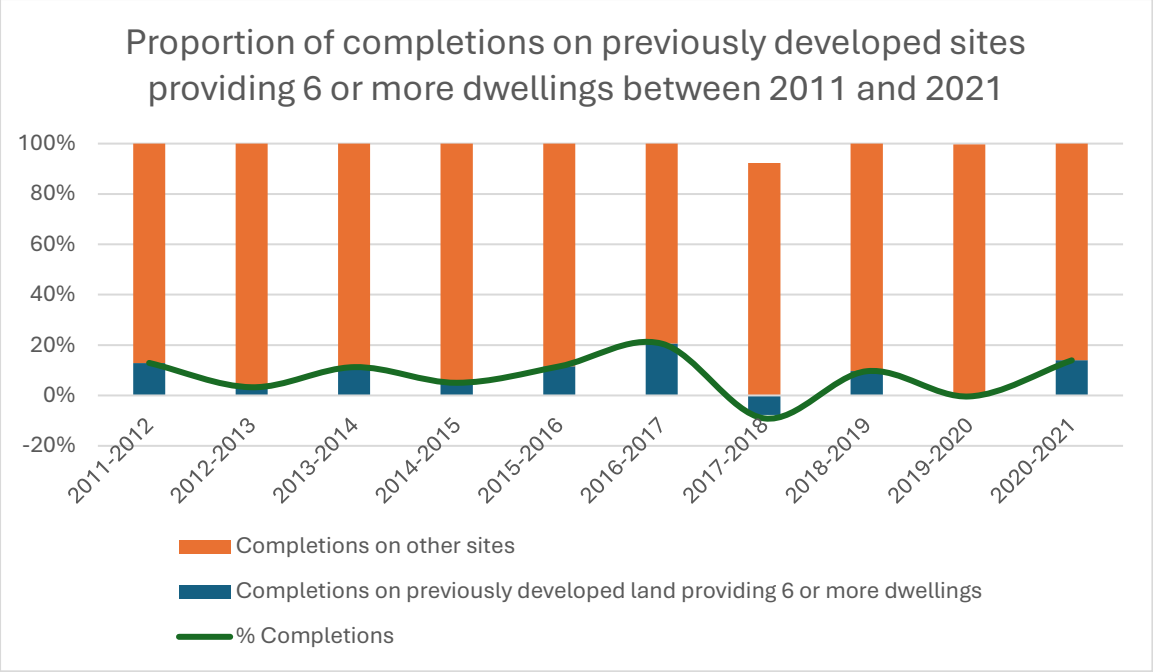


Figure 7: Proportion of completions on previously developed sites providing 6 or more dwellings between 2011 and 2021

6.3. Table 4 completes the dataset and provides the proportion of completion on windfall sites on previously developed land between 1 April 2021 and 31 March 2026. However, it should be noted that to align with the Council approach to allocate sites from 5 dwellings, this dataset accounts for completions on windfall sites on previously developed land providing 5 and more dwellings.

Table 4: Net windfall completions from previously developed land providing 5 or more dwellings by year (2021/22 – 2025/26)

Year	Completions on previously developed land providing 5 or more dwellings	Total Completions	% Completions
2021-2022	82	685	11.97%
2022-2023	99	1140	8.68%
2023-2024	86	986	8.72%
2024-2025	46	1093	4.21%
2025-2026	47	1206	3.90%
Total	**360**	**5110**	**7.05%**
Average	**72**	**1022**	**7.04%**

6.4. It shows that between 2021 and 2026 development on previously development land providing 5 or more dwellings have delivered on average 72 dpa and have accounted for 7.04% of all completions, noting a significant increase in all deliveries over this period compared to the period between 2011 and 2021.

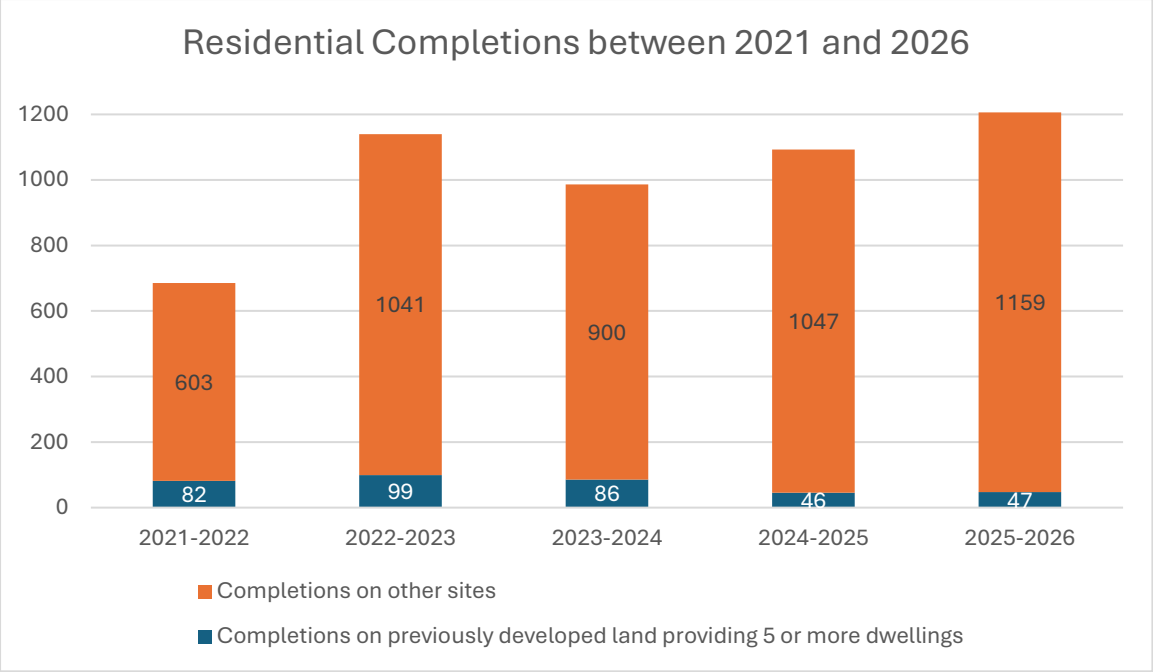


Figure 8: Residential completions from 2021 to 2026

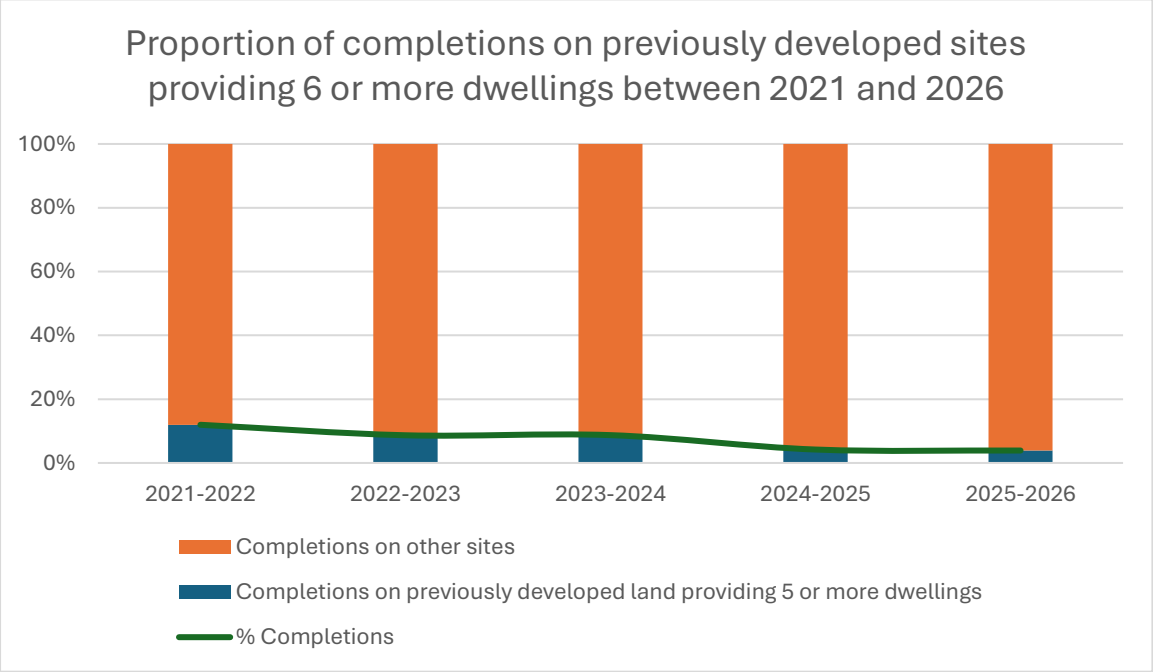


Figure 9: Proportion of completions on previously developed sites providing 6 or more dwellings between 2021 and 2026

Policy narrative

6.5. The September 2020 changes to the Use Classes Order also had important implications for permitted development rights and the conversion of commercial premises to residential use. By creating the new, broader Class

E, a wide range of town centre uses such as shops, offices, restaurants, gyms and health services could move between one another without the need for planning permission, increasing flexibility for businesses.

6.6. These reforms paved the way for further changes to permitted development rights, including the introduction in 2021 of Class MA, which allows the change of use from Class E premises to dwellinghouses, subject to prior approval and certain limitations. This significantly widened opportunities for the residential conversion of commercial buildings, particularly in town centres and high streets.

6.7. While these changes were intended to support the reuse of vacant commercial floorspace and boost housing delivery, concerns have been raised that they could result in the loss of employment space, retail facilities and other town centre services where local planning authorities have limited ability to manage such changes.

6.8. The combination of greater flexibility within the Use Classes Order, expanded permitted development rights and national and local policy support for the redevelopment of previously developed land has created additional opportunities for residential development to come forward outside the site allocation process. This is particularly relevant to large windfall sites, where the redevelopment or conversion of existing commercial, institutional or previously developed sites can deliver six or more net dwellings. These changes are expected to continue contributing to the supply of large windfall housing developments across the district during the new Local Plan period to 2042.

Historic Trend Analysis

6.9. As directed by the PPG, the datasets set out in this section, as well as in earlier parts of this report, are used to identify trends in the delivery of large windfall sites and estimate the future supply of windfall sites. This ‘windfall allowance’ can be used to support a robust Housing Trajectory.

6.10. It was set out in previous sections of the report that the Council hold two different datasets in relation to large windfalls which will be further analysed below. However, considering the significant policy change which has affected previously developed land since the reform of use class order in September 2020, the windfall allowance for large sites will be developed using the monitoring period from 1 April 2021 until 31 March 2026.

6.11. Table 3, from the Council’s previous windfall study, shows that between 1 April 2011 and 31 March 2021 the deliveries on previously development land from schemes of 6 or more dwellings has varied significantly with losses in 2017/2018 and 2019/2020 and over 100 dwellings delivered in 2017/2016 and 2020/2021.

6.12. Figure 10 shows that this pattern is not consistent with the total number of housing completions each year. From 2013, the overall housing completions were largely in line with, although slightly above, the requirement set out in the Wealden District Core Strategy Local Plan fixed at 450 dpa until it became out-of-date, in 2018, five years after its adoption. Housing completions subsequently increased reflecting the lack of 5-year housing land supply in Wealden. Lower overall completion rates were recorded in 2020/2021 following the Covid-19 pandemic. The supply from schemes of 6 and more dwellings occurring on previously developed land appear to have halted ahead of the pandemic and provided over 100 completions in the year affected by lockdown, indicating a resilience of supply from this source.

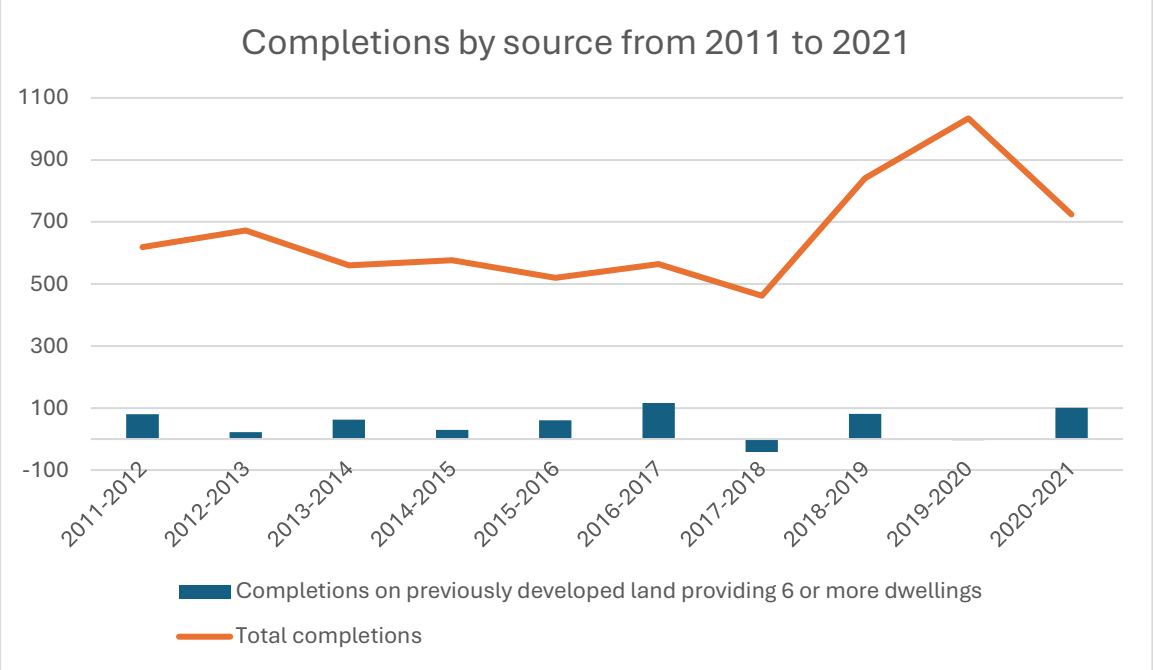


Figure 10: Completions by source between 2011 and 2021

6.13. In the period from 1 April 2021 to 31 March 2026, the deliveries from schemes of 5 or more dwellings on previously developed land have been generally more consistent and resumed to levels comparable to that pre-Covid 19. Figure 11 shows a slight downward trend in the last couple of years.

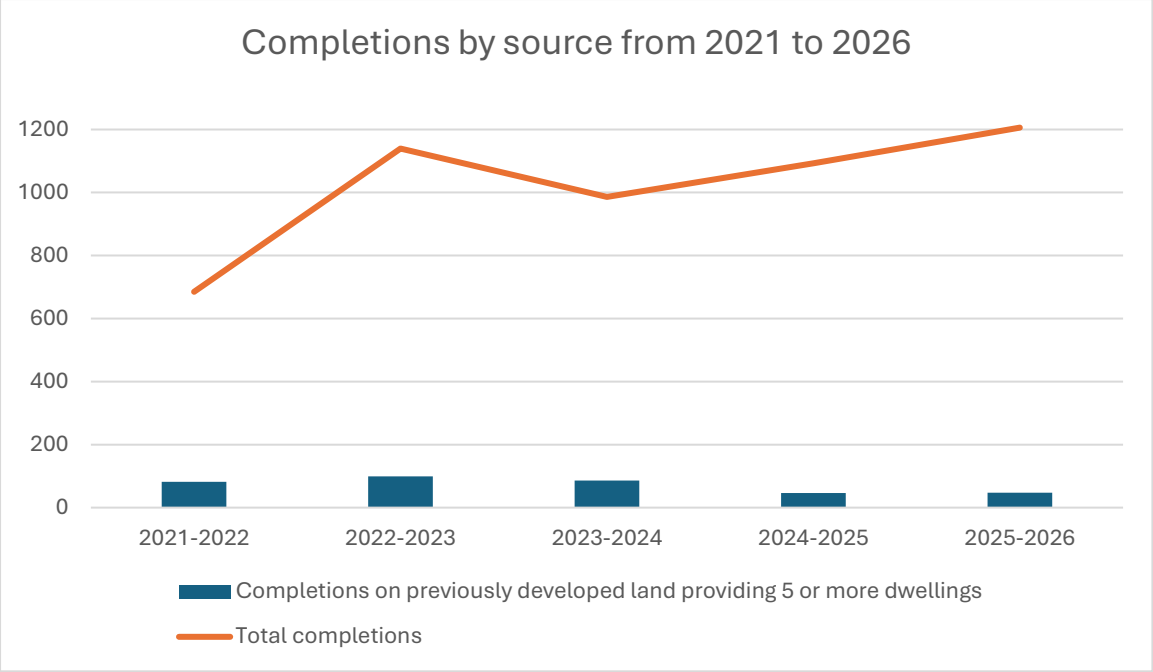


Figure 11: Completions by source between 2021 and 2026

Estimation of future windfall delivery

6.14. The results of the analysis show that there has, historically, been a modest but steady supply of completions coming forward through large windfall sites both during the 2011-2021 and 2021-2026 periods. Looking at the relevant monitoring of 2021-2026 used as the reference years for this part of the report, schemes of 5 and more units on previously developed land (i.e. large windfall), contributed to the delivery of 360 dwellings over this period providing an average of approximately 72 dwellings per annum. Large windfall sites completions equate to around 7.04% of all new completions on an annual basis. It is considered that this has provided a reliable source of growth, albeit with a downward trend in the recent years.

6.15. With the allocation of housing sites within the Proposed Submission Wealden Local Plan (Regulation 19), delivery rates of large windfall were in the long term expected to decrease. However, an additional source of supply has been seen with the change to planning use categories (particularly Use Class E) that has enabled the conversion and redevelopment of previously developed sites into residential dwellings under permitted development rights. In addition, the new NPPF (August 2026) places significant emphasis on making effective use of land, including via the redevelopment of previously developed land where appropriate, particularly where it support housing delivery and sustainable development.

6.16. On this basis, it is expected that large windfall sites would remain at least similar. However, it is prudent to discount windfall projections so as not to overstate their importance to overall supply. It is considered appropriate to apply a discount of 20% to account for future uncertainties.

6.17. The data reveals that completions on large windfall sites in the last 5 years have contributed to the provision of 360 homes, at an average of 72 dwellings per annum. This would amount to 1,044 homes over the plan period (72 dwellings x 14.5 years). It should be noted that the allowance is accounted for from year 1.5. Excluding the first 18 months avoids the risk of double counting completions with sites with extant permissions that will be delivered within 18 months of the grant of planning permission, as a result of the implementation of the Housing Action Plan in Wealden District.

6.18. The Proposed Submission Wealden Local Plan (regulation 19) does however include proposed allocations on a number of brownfield sites providing in total 367 homes, which should be discounted to avoid double counting. This will leave a potential 677 dwellings to be delivered on large windfall over the plan period, which equates to 37 dwellings per annum including the 20% discount for future uncertainties (677 dwellings / 14.5 year x 0.8 to discount uncertainties).

7. Conclusion

7.1. The evidence set out in Section 5 and 6 of this report shows that both small and large windfall have consistently made an important to housing supply in Wealden and the conclusion for each type of windfall provision are summarised in Table 5.

Table 5: Proposed windfall levels within the Wealden Local Plan

	Dwellings per annum	**Dwellings during the Plan Period**
Small windfalls within development boundaries	63	913
Small windfalls outside development boundaries	19	275
Large windfalls	37	536
Total windfalls	**119**	**1,724**

7.2. In conformity with the PPG, the windfall allowance is to be assumed to contribute toward the housing trajectory from year 1.5 of the Proposed Submission Wealden Local Plan and onwards over the remaining 14.5 years of the plan. The average of 119 dwellings equates to a total windfall allowance of 1,724 dwellings.

Limitations

7.3. This Windfall Study is based on the appropriate and available evidence for the Local Planning Authority and is a tool for estimating windfall delivery on future windfall sites that have not yet been identified. Housing land supply projections, particularly relating to windfall estimates, are not an exact science. Projections are based primarily on historic trends and current information about short-term and long-term housing delivery patterns and the influence of the economy on the house building industry. The Windfall Study attempts to relate housing trends in the past to likely future conditions.