Mid Sussex District Council

Windfall Study

November 2015

Contents

1.0 Objective

1.1 To examine past trends of housing delivery on windfall sites in Mid Sussex and estimate future housing land supply from this source.

1.2 The Windfall Study will form part of the housing land supply evidence for the District Plan and support any proposed windfall allowance in the Council's Housing Trajectory.

2.0 Introduction

2.1 The Study records and examines past trends of housing delivery on windfall sites from 2001 to 2014. It analyses the level of development identified in the Council's housing trajectory and the possible future economic trends over the study period. Likely levels of housing delivery from windfall sites into the future are estimated, building on previous work in Annual Monitoring Reports, Housing Land Supply surveys and Strategic Housing Land Availability Assessment. 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.

3.0 Definition of windfall sites

3.1 Windfall sites are "sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available." (*National Planning Policy Framework 2012, Annex 2: Glossary, page 57*)

3.2 Windfall sites in Mid Sussex are therefore those that deliver housing without being allocated in the Development Plan[1].

3.3 "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens." (*National Planning Policy Framework 2012, paragraph 48*).

3.4 The Planning Practice Guidance sets out how a windfall assessment can be determined as part of the Housing and Economic Land availability assessment. It states "A windfall allowance may be justified in the five-year supply if a local planning authority has compelling evidence as set out in paragraph 48 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 based on a geographical area" *(Paragraph: 24 Reference ID: 3-24-20140306)*

3.5 Most windfall sites are on previously developed (brownfield) land and/or located within a settlement boundary (Built Up Area). 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 in a planning application. Occasionally, unused 'green' land within built up areas (not including residential gardens) is developed for housing and this is also considered to be windfall if it is not formally allocated.

[1] West Sussex Structure Plan (2001) (now expired); Mid Sussex Local Plan (2004); Small Scale Housing Allocations DPD (2008); District Plan (emerging), Neighbourhood Plans and Site Allocations Document.

4.0 Windfall sites as a source of housing land supply

4.1 Windfalls are normally legitimate development sites that comply with planning policy, but unexpectedly come forward on previously developed land and/or within the 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. They 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 6 units are not assessed in land supply surveys or the Strategic Housing Land Availability Assessment (SHLAA) but consistently come forward for development, creating a steady supply of small windfall sites.

4.2 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, the SHLAA 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 SHLAA is to minimise the uncertainty of windfalls and identify when and where they are likely to come forward in the Housing Trajectory.

4.3 Many sites with planning permission were not previously allocated in the Development Plan and were therefore windfall sites. Once they gain permission they become 'Commitments' and are counted separately.

Avoiding duplication

4.4 The SHLAA helps to support the Housing Trajectory by identifying sites (through the processes described in paragraph 4.1) 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 accounted for in the SHLAA must be discounted to avoid 'double-counting' over the same time periods.

4.5 The Framework does allow windfall sites to be included in the five year housing land supply, if compelling local evidence is provided and double-counting is avoided[2]. Therefore, a windfall estimate is produced for large and small windfall sites over the first five years, and the period beyond, and any sites identified in the SHLAA or Commitments with planning permission must be discounted from this figure to provide a robust windfall allowance in the Housing Trajectory.

[2] NPPF (*DCLG, 2012, paragraph 48*); and Planning Practice Guidance, *Paragraph: 24 Reference ID: 3-24-20140306)*

5.0 Methodology in brief

5.1 The Framework and the Planning Practice guidance have been used to undertake this Windfall Study. The Study:

A. Records historic windfall completion rates.
B. Examines the results over the Study Period.
C. Analyses historic trends.
D. 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.

5.2 The Study uses *net* housing completion figures from 1st April 2001 to 31st March 2014. A more detailed analysis of completion figures (including a breakdown of previously developed and garden sites) is provided from 1st April 2007 to allow a more detailed analysis of the supply of windfall sites. This date was chosen as the preparation of the first SHLAA for Mid Sussex commenced during 2007/2008. This also gives a monitoring period of 7 years. The windfall completion rates should exclude garden land to accord with the definition in the Framework. The assessment also excludes sites within the South Downs National Park, as the National Park Authority will be preparing a Plan for the Authority area.

5.3 “Small sites” deliver 1-5 *net* units. “Large sites” deliver 6 or more *net* units.

5.4 The Planning Practice Guidance requires ongoing monitoring of whether the windfall allowance (where justified) is coming forward as expected, or may need to be adjusted (*Paragraph: 043 Reference ID: 3-043-20140306*). The Authority’s Monitoring Report will contain information on the actual supply of windfall sites on an annual basis.

7.0 Historic windfall completion rate and analysis

Figure 1: Windfalls as a proportion of Total Housing Completions (2001 - 2012)

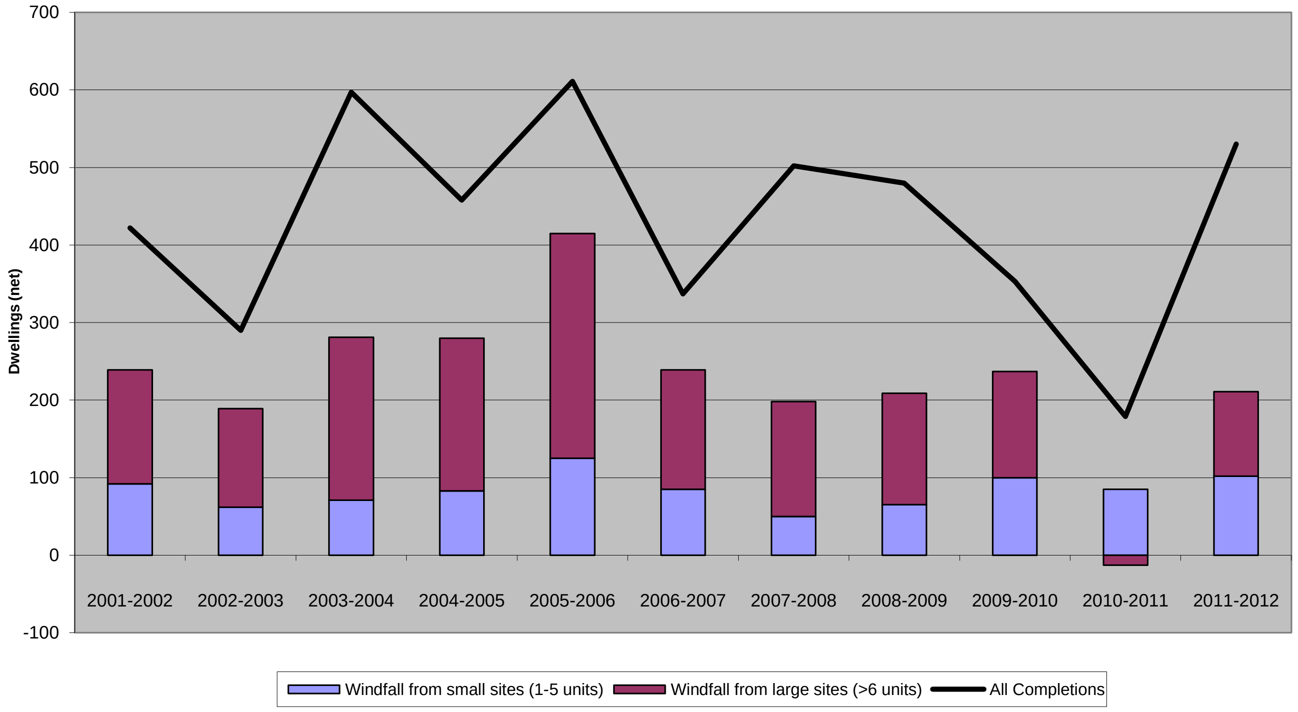
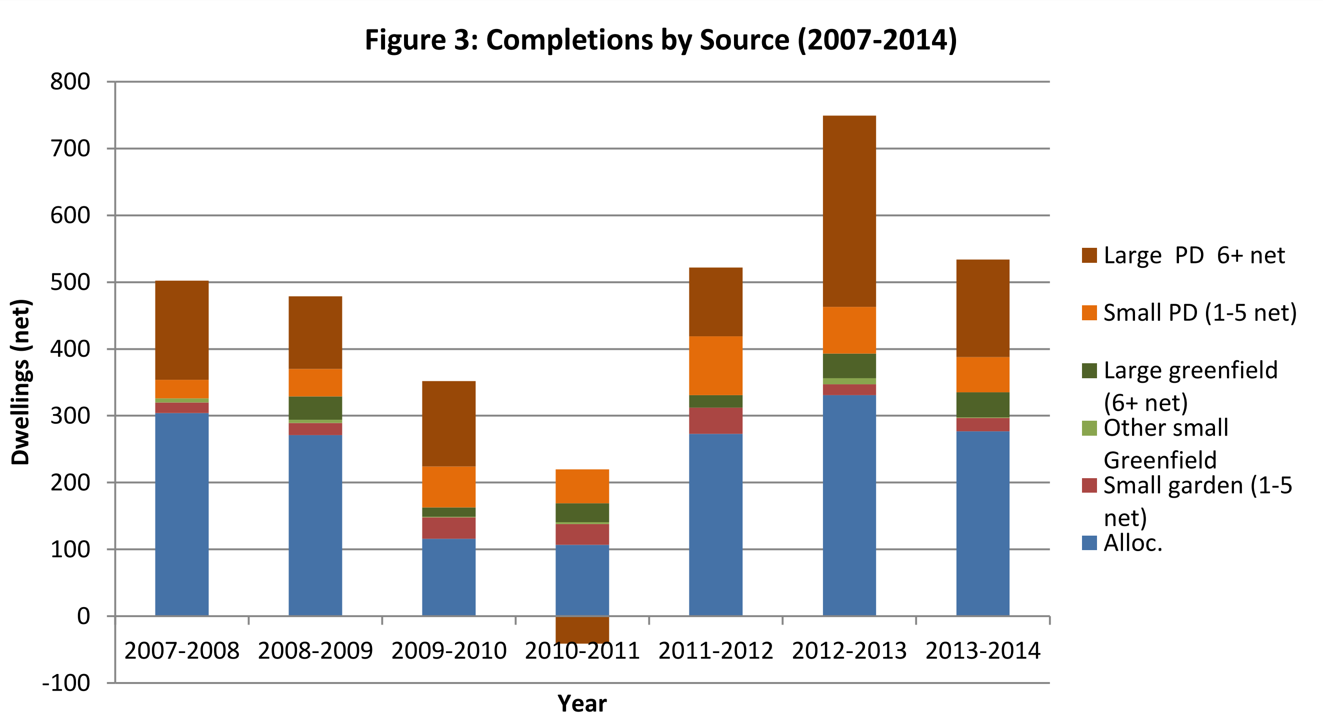


Figure 2: Breakdown of the historic windfall completion rates between 2007 - 2014

Year	Total Completions	Allocations	Small garden (1-5 net)	Other small greenfield	Large Greenfield (6+net)	Small PD (1-5 net)	Large PD (6+ net)	National park	Windfall as a proportion of Total
2007-2008	502	304	16	6	0	28	148	0	39%
2008-2009	480	271	18	5	35	41	109	1	44%
2009-2010	353	116	32	1	14	61	128	1	67%
2010-2011	179	107	31	3	28	51	-41	0	40%
2011-2012	522	273	39	0	19	88	103	0	47%
2012-2013	749	331	16	9	37	70	286	0	55%
2013-2014	536	277	20	1	37	53	146	2	48%
Total	**3320**	**1679**	**172**	**25**	**170**	**392**	**879**	**4**	
Average per annum	**474**	**239**	**27**	**3**	**19**	**56**	**125**	**0.5**	**57%**

Figure 3: Completions by Source, 2007 - 2014



Examination of total windfall completions

6.1 The Study shows that windfall sites provide a substantial and consistent contribution to housing delivery in Mid Sussex. Development on all windfall sites has delivered an average of 252 dwellings per annum (dpa) for the last 13 years. This accounts for 54% of all housing land supply across the Study period. Of the total windfalls, an average of 85 dpa were delivered on small sites and 167 dpa on large sites. Windfall completions, as a proportion of total completions, vary from year to year as shown in Figures 1 and 3.

6.2 2012/13 saw a peak in windfall completions at 418 units, particularly on larger sites. This accounted for 55% of total completions. This year also saw a spike of 749 total completions. This may have occurred due to favourable market conditions allowing for the completions of schemes that had been on hold during the recession. 2006 - 2007 saw the highest percentage of windfall completions with 71% of the total. This is due to a slowing of completions on Local Plan allocated sites. Also, most of the larger windfall sites[3] completed in 2005/06 were permitted prior to the adoption of the Local Plan in 2004, indicating there may have been an opportunity to progress large windfall sites at a time when the supply of allocated housing land was low..

6.3 As a proportion of total completions, 2007/08 saw the lowest contribution of windfalls at 39%. This occurred because several large sites[4] allocated in the 2004 Local Plan were completed during 2007/2008, driving the level of planned housing completions up to 304 units compared to a comparatively moderate windfall level of 198 (502 combined total).

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[3] Completions in 2005/06, permitted prior to 2004 Local Plan adoption, include 88-90 Mill Road, Burgess Hill; 135-137 High Street, Hurstpierpoint; Kitsbridge Hotel, Copthorne; Pophams, Copthorne Common Rd, Copthorne;

[4] Completions on Local Plan allocated sites included Bolnore Village, Haywards Heath; Hemsleys Nursery, Pease Pottage; Orchard Way, Hurstpierpoint.

6.4 The three years to March 2011 saw a steady decline in total completions as the impacts of the economic recession were seen on the house-building industry and the number of undeveloped sites allocated in the Development Plan began to dwindle. Conversely, the delivery of windfall sites increased through this period, most notably on small windfall sites, demonstrating resilience to the declining trend. The *net* negative result for completions on large windfall sites in 2010/11 is due to the demolition of 109 units on a site[5] in Haywards Heath but this delivered a significant *net* increase in 2012/13 and 2013/14.

6.5 Mid Sussex had a good year for total housing delivery in 2012/13 with 749 completed dwellings. The reason for this was a resurgence in construction on larger allocated greenfield sites[6] which had stagnated during the recession years from 2008. This year also saw the completion of sites allocated in the Small Scale Housing Allocations Document (2008). 2013/14 also saw a steady supply of windfalls providing 48% of the total supply. The windfall supply was boosted by the redevelopment of two town centre sites[7] and two large greenfield sites[8].

Historic trend analysis

6.6 As directed by the Guidance, the results set out in Appendix 1 and 2 are used to identify trends in the delivery of windfall sites and estimate the future supply of windfall sites. The NPPF paragraph 48 states that the windfall allowance should not include garden land; therefore further analysis of the supply from this source is also required. This 'windfall allowance' can be used to support a robust Housing Trajectory.

Trend analysis: Small sites

6.7 Appendix 1 shows a cyclical delivery of small sites over approximately five year periods. These cycles range from 50 to around 127 dpa. The last low-point in the cycle coincided with the start of the economic recession in 2007/08, but delivery returned to another peak at 100 dpa in 2009 despite the continuing recession and its impact on the house building industry. A higher peak was seen in 2011/12 with 127 dpa. After this peak, delivery from this source fell but the average for the past 5 years is higher than the longer term average, with an average of 95 dpa. The continued delivery of small sites through the recession shows resilience to depressed market conditions (see paragraph 2.4) and demonstrates a trend that they will continue to provide a consistent, albeit cyclical, level of housing at a robust average of 85 dwellings per annum in the long term.

6.8 When looking at small previously developed site completions only[9] the trends are less consistent (Appendix 2). 2007 – 2008 saw the lowest level of 28 dwellings compared to 88 dwellings in 2011 – 2012. The average for the past 3 years has been 70 dpa; this is higher than the longer term average of 56 dpa. Overall small previously developed sites account for 70% of the small windfall supply and 22% of the total windfall supply. As this source has given a continuous supply over the study

[5] Wilmington Way site: 109 demolished units in 2010/11; 185 new units in 2011/12-2012/13. 76 net units overall.
[6] Large allocated greenfield site completions in 2013/14: Mackie Avenue, Hassocks; Bolnore Village, Haywards Heath; Newton Road; Lindfield; Folders Meadow, Burgess Hill; Manor Close, Burgess Hill; Gravelye Lane, Lindfield.
[7] Willmington Way, Haywards Heath; The Brow, Burgess Hill;
[8] Bylanes Close, Cuckfield and Imberhorne Lane, East Grinstead.
[9] Excluding garden land, other small greenfield and sites in the National Park.

period, an allowance based on the longer term average of 56 dpa is therefore considered to be reasonable.

6.9 It is not clear if the introduction of the exclusions of garden land from windfalls, as required by National Planning Policy Framework has impacted on the supply from this source. An average of 18 dwellings from this source from 2012-2014 compares with an average of 17 dwellings from this source in 2007 – 2009.

Trend analysis: Large sites

6.10 Appendix 1 shows a long term average of 167 dpa on large sites. However there is an overall trend of a fall in the supply from this source; except 2005/06 and 2012 – 2013. The average large completions rate between 2007 – 2014 was 149.

6.11 During the recession from 2007 to 2010, large sites delivered an average of 143 dpa. The declining trend of large windfall completions can be seen to continue during this period up until 2012/13. Overall, housing completions started to rise in 2011-12, although the number of large windfalls remained low, with 103 completions. This compares to an average of 125 dpa. 2012 – 2013 saw a very high number of overall completions, and large windfalls accounted for 43% of this supply. Based on historic trends this year could be considered to be exceptional. Without this year the average number of completions between 2007 – 2014 is 121 dpa.

6.12 Large greenfield sites, including garden land, produced an average of 24 units per year, accounting for 16 % of the total large windfalls. The last two years have had 37 large greenfield completions. It is not possible to see a clear trend on supply from this source; however it should be excluded from a windfall allowance. Large previously developed sites account for an average of 125, representing 84% of the total large windfall. Again it is not possible to see a clear trend in the supply from this source, with the dpa ranging from 103 – 286. The peak of 286 was in 2012/13, which also saw a peak in total housing completions. Without taking into account this year the average was 126 dpa.

6.13 When estimating windfall delivery for large sites in the short to medium-term based on these past and current trends, consideration should be given to market conditions. At the current time the economy is buoyant, however given the cyclical nature of the economy a period of economic decline is likely during the Plan period. During this time, the delivery of large windfall sites may continue to follow the overall declining trend of the past 11 years but possibly at a slower rate as seen from 2007 to 2010. Therefore an estimate based on the average of 125 dpa for large previously developed sites is considered appropriate.

7.0 Estimating future windfall delivery

7.1 The long-term historic trends identified above, particularly the average completion rates of the past 7 years, provide a view of windfall delivery over the whole Study Period and 'flatten-out' planning policy changes and economic cycles. This is more useful as a basis for estimating long-term windfall delivery.

7.2 The short-term trends identified above, based on more recent periods of time where market conditions were similar to those at present, are more useful for estimating short-term windfall delivery over the next five years. Appendix 3 provides further information on short term windfall estimates.

Small sites previously developed sites

7.3 The trend analysis in paragraph 2.8 found that small previously developed sites delivered an average of 56 dpa. It is difficult to see a clear trend, although there has been a continued supply from this source. Supply from this source continued during the recession, indicating a resilience of supply from this source. As the current time the house building industry is relatively stable, but historically it does operate on a cycle of boom to bust. Taking these factors into account it is considered to include an allowance of 56 dpa for small previously developed sites. In the short term, with conditions in the house-building industry likely to remain similar to those of recent years, a short-term windfall estimate of 56 dpa is considered robust for the next five years (*56, 56, 56, 56, 56* – or 280 units in total).

7.4 There is evidence that 180 units[10] with extant planning permission will be delivered on small sites in the next three[11] years (on previously developed and garden sites). These small sites came forward as windfalls prior to obtaining planning permission. The windfall estimate must therefore discount these units to avoid double-counting. This equates to 60 units per annum of over the next three years. As this is more than the trend of 56 units per annum, an allowance should not be made in the first 3 years. A windfall allowance for small sites in the next five years of 108 units (*0, 0, 0 56, 56)* can be proposed for the Housing Trajectory.

7.5 Following this first five year period, small sites are expected to remain at the cyclical average of 56 dpa over the remaining Plan Period. A windfall allowance can be included within broad locations that are identified for development *(Planning Practice Guidance, Paragraph: 24 Reference ID: 3-24-20140306).* The emerging Mid Sussex District Plan does not identify broad locations in years 6 onwards for development.

Large sites

7.6 Data in Appendix 2 shows there are currently commitments for 3,844 units on large sites including 2,185 units[12] on large windfall sites (56% of total). Of these commitments, there are 13 sites with a permitted total of 330 units remaining that are currently under construction[13]. This leaves 1,855 units to be delivered on large sites.

7.7 In terms of estimating large windfall delivery specifically, the number of large windfall sites that are currently under construction or expected to commence in the short term suggests a high level of delivery in the short-medium term. However, with the overall declining trend in large windfall sites over the Study period, delivery rates in the

[10] See Appendix 2 (Source: MSDC Commitment Monitoring 2014).
[11] Planning permissions on small sites expire within three years of issuing.
[12] See Appendix 2 (Source: MSDC Commitment Monitoring 2014).
[13] MSDC Commitment Monitoring (April 2014)

longer term are likely to be similar to conditions seen in the last recession (an average of 143/ 125 dpa, see paragraphs 2.11 and 2.12).

7.8 2014 has also seen the approval of a number of large, greenfield sites. The reason for this has been that Mid Sussex District Council has been unable to demonstrate a 5 year supply of housing since 2010. Therefore a continued increase in the level of supply from greenfield windfall sites is expected to continue until there is an adopted District Plan. Therefore, it is necessary to be cautious on relying on a continued supply from this source, as supply from this source will reduce once the District Plan is adopted and due to potential of double counting with sites identified in the SHLAA. In 2013/14 there were 25 completions[14] on two sites that were granted planning permission due to the Council being unable to demonstrate a 5 year land supply.

7.9 An additional source of supply has been seen since the introduction of prior notification approvals in April 2013 for the conversion of office to residential units. At the present time this relaxation of planning regulation is temporary and therefore cannot be relied upon as an ongoing source of supply. It is also too early to establish the implementation rate of the notifications that have been approved.

7.10 These figures are a positive indicator for windfall and non-windfall housing delivery in the short - medium term, as permissions on greenfield sites and prior notification approvals are implemented. However, in the longer term if these sources of supply reduce, the historic downward trend is likely to continue.

7.11 A conservative short-term estimate for average large windfall completions on previously developed sites for the next five years of 625 units in total (or 125 dpa), is therefore considered to be robust. The large windfall sites with permission (including sites that have commenced) must be discounted from this first five year estimate to avoid double-counting and support a robust windfall allowance in the Housing Trajectory, as set out in paragraph 1.12.

7.12 Appendix 2 shows that 1,748 units on large windfall sites with permission are considered to be deliverable within the first five years. This exceeds the windfall estimate based on past trends and market analysis and so there is no justification for an additional windfall allowance on large sites in the short term.

7.13 For a longer-term estimate of large windfall sites, the Study Period average has been 167 dwellings per annum but with a continuing downward trend until 2011. In the short term the number of windfall completions is expected to rise. In the longer term a downward trend is likely, particularly with the emerging District Plan and Neighbourhood Plans which will limit the ability of larger windfall sites to secure planning permission as the majority of housing will be delivered on identified sites through the Development Plan process. A long-term estimate of 75 dpa on large previously sites is therefore considered robust for use in the Housing Trajectory, discounting any further windfall commitments in the longer term that emerge through the Neighbourhood Plan process. The SHLAA identifies an average of 75dpa on previously developed sites, from year 6 onwards. In practice, these are the sites that the Town and Parish Councils are likely to choose from when preparing their Neighbourhood Plans. Therefore in the longer term these sites are likely to come forward as allocated sites rather than windfalls. This is the same as the estimate based on past trends and market analysis and so there is no justification for an additional windfall on large previously developed sites in the short term.

[14] West of Imberhorne Lane, East Grinstead and Bylanes Close, Cuckfield

Presentation of results

7.14 The Planning Inspectorate recommended at the Examination of the Small Scale Housing Allocations DPD that a 20% discount[15] should be applied to windfall allowances in Mid Sussex to allow for non-delivery and ensure a robust trajectory. This approach is considered appropriate for long-term projections in this Windfall Study, where less is known about the likely delivery of windfall sites. In the short-term however, robust evidence has been produced and no discount is applied.

Windfall Allowance, by size:	*Years 1-5 (Total)*	**Years 1-5 (units per year)**	*Years 6+ (units per year)*	**Years 6+ (units per year: *20% discount*)**
Small Sites	*112*	**0, 0, 0, 56, 56**	*56*	**45**
Large Sites	*0*	**0**	*0*	**0**

Using a windfall allowance in the Housing Land Supply Trajectory

7.15 The NPPF allows the Council to "make an allowance for windfall sites in the first five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply" having regard to the SHLAA, historic windfall completion rates and expected future trends (*NPPF: paragraph 48*). The suggested windfall allowance figures provide evidence to support the inclusion of a windfall allowance in the Housing Trajectory. The decision on whether or not such an allowance will be included within the Housing Trajectory will be made through the preparation of the District Plan.

Windfall allowance within the Ashdown Forest HRA Zone of Influence

7.16 Further work has been undertaken to establish a windfall allowance within the Ashdown Forest HRA Zone of influence. This work is set out in Appendix 5.

Limitations

7.17 The Study is based on appropriate available evidence 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 limited 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, and is not guaranteed to be accurate.

[15] Small Scale Housing Allocations DPD: Inspector's Report (2007, paragraphs 4.60 – 4.73).

Appendix 1 : Past Windfall Delivery Data (2001 – 2014)

Total Completions compared to all Windfall Completions (net dwellings)

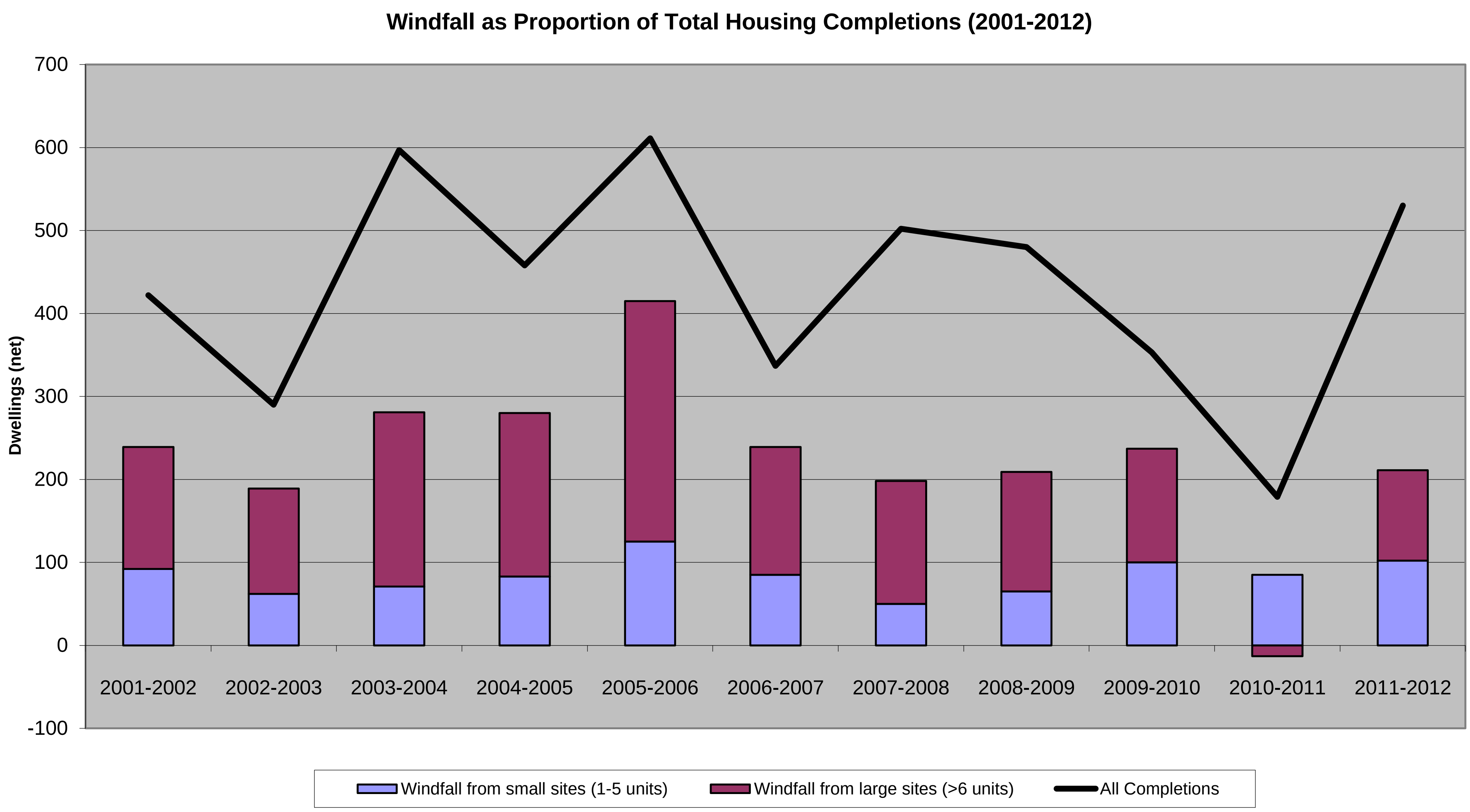
Year	**Total Completions inc. Windfalls**	**Windfall Completions only**	**Windfall as proportion of Total**
2001-2002	422	239	57%
2002-2003	290	189	65%
2003-2004	597	281	47%
2004-2005	458	280	61%
2005-2006	611	415	68%
2006-2007	337	239	71%
2007-2008	502	198	39%
2008-2009	480	209	44%
2009-2010	353	237	67%
2010-2011	179	72	40%
2011-2012	522	249	47%
2012-2013	749	418	55%
2013-2014	536	259	48%
Average per annum	**464**	**252**	**54%**

Windfall Completions from all large and small sites (net dwellings)

Year	Small Windfall sites (1-5 units)	Large Windfall sites (6+ units)	All Windfall Completions
2001-2002	92	147	239
2002-2003	62	127	189
2003-2004	71	210	281
2004-2005	83	197	280
2005-2006	125	290	415
2006-2007	85	154	239
2007-2008	50	148	198
2008-2009	65	144	209
2009-2010	95	142	237
2010-2011	85	-13 [16]	72
2011-2012	127	122	249
2012-2013	95	323	418
2013-2014	76	183	259
Average per annum	**85**	**167**	**252**

Data sources: West Sussex County Council – Housing Land Supply surveys; Mid Sussex District Council – Completions monitoring, Mid Sussex District Council Annual Monitoring Reports; Mi d Sussex District Council – planning application register

[16] Negative net completion figure due to large-scale demolition – see paragraph 2.4 of main report



Windfall as Proportion of Total Housing Completions (2001-2012)
Dwellings (net)
700
600
500
400
300
200
100
0
-100
2001-2002
2002-2003
2003-2004
2004-2005
2005-2006
2006-2007
2007-2008
2008-2009
2009-2010
2010-2011
2011-2012
Windfall from small sites (1-5 units)
Windfall from large sites (>6 units)
All Completions

Appendix 2: Past Windfall Delivery Data (2007 – 2014)

Total Completions by type (net dwellings) (2007 -2014)[17]

Year	Total Completions inc. Windfalls	Small garden (1-5 net)	Other small greenfield	Large Greenfield (6+net)	Small PD (1-5 net)	Large PD (6+ net)	National Park
2007-2008	502	16	6	0	28	148	0
2008-2009	480	18	5	35	41	109	1
2009-2010	353	32	1	14	61	128	1
2010-2011	179	31	3	28	51	-41	0
2011-2012	522	39	0	19	88	103	0
2012-2013	749	16	9	37	70	286	0
2013-2014	536	20	1	37	53	146	2
Total	**3320**	**172**	**22**	**170**	**392**	**879**	**4**
Average per annum	**449**	**27**	**3**	**19**	**56**	**89**	**0.5**

[17] NPPF states that windfall allowance should not include garden land. A breakdown of windfalls by type has been undertaken from 2007-2008. This table also identifies windfalls within the South Downs National Park, which does not form part of Mid Sussex District Plan area.

Total Completions Small sites, excluding Garden Land (net dwellings) (2007 -2014)

Year	**Total Completions** inc. Windfalls	**Total Small completions**	**Total small completions as a proportion of total**
2007-2008	502	44	8%
2008-2009	480	59	12%
2009-2010	353	93	26%
2010-2011	179	82	45%
2011-2012	522	127	24%
2012-2013	749	86	11%
2013-2014	536	73	13%
Total	**3320**	**564**	**16%**
Average per annum	**449**	**80**	**17%**

Year	**Total Completions** inc. Windfalls	**Small garden land (1-5 net)**	**Small garden land sites as a proportion of total of small completions**	**Small PD (1-5 net)**	**Small previously developed as a proportion of total of small completions**
2007-2008	502	16	36%	28	64%
2008-2009	480	18	30%	41	70%
2009-2010	353	32	34%	61	65%
2010-2011	179	31	37%	51	63%
2011-2012	522	39	30%	88	70%
2012-2013	749	16	18%	70	82%
2013-2014	536	20	27%	53	73%
Total	**3320**	**172**	**30%**	**392**	**70%**
Average per annum	**449**	**24**	**30%**	**56**	**70%**

Total Completions Large sites, excluding Garden Land (net dwellings) (2007 -2014)

Year	Total Completions inc. Windfalls	Total Large completions	Total large completions as a proportion of total
2007-2008	502	148	29%
2008-2009	480	144	30%
2009-2010	353	142	38%
2010-2011	179	-13 [18]	N/A
2011-2012	522	122	19%
2012-2013	749	323	43%
2013-2014	536	183	34%
Total	**3320**	**1049**	**30%**
Average per annum	**449**	**149**	**32%**

Year	Total Completions inc. Windfalls	Large Greenfield[19] (6+net)	Large greenfield[20] land sites as a proportion of total of large completions	Large PD (6+ net)	Large previously developed as a proportion of total
2007-2008	502	0	0%	148	100%
2008-2009	480	35	24%	109	76%
2009-2010	353	14	9%	128	91%
2010-2011	179	28	N/a%	-41	N/A[21]
2011-2012	522	19	15%	103	85%
2012-2013	749	37	11%	286	89%
2013-2014	536	37	20%	146	80%
Total	**3320**	**170**	**16%**	**879**	**84%**
Average per annum	**449**	**24**	**16%**	**125**	**84**

[18] Negative net completion figure due to large-scale demolition – see paragraph 2.4 of main report
[19] Includes large garden infill's
[20] Includes large garden infill's
[21] For information the gross figure for this year was 98 dwellings

Appendix 3: Committed Future Windfall Supply (as at 1st April 2014)

All Extant 'Commitments' (units with planning permission or allocation) as at 1st April 2014
Commenced units are considered the most deliverable as development has started on site; work had begun on these sites at 1st April 2014.

	All Commitments	Windfall Commitments	Non-Windfall Commitments	Windfall as proportion of Total	*All Commenced*	*Windfalls Commenced*	*Non-Windfalls Commenced*
Small sites (1-5 units)	180	180	0	100% #	*54*	*54*	*0*
Large sites (6+ units)	3844	2185*	1659	56%	*1348*	*502*	*723*
Total	**4224**	**2365**	**1659**	**58%**	***1402***	***556***	***723***

Windfall Supply accounts for 100% of All Commitments on small sites (1-5 units): sites of this size are rarely allocated in the Development Plan.
*2185 delivered over the Plan Period. 1748 of these are considered deliverable within the first five years; (Source: SHLAA)

Data sources:
MSDC Commitments Monitoring (1st April 2014);
MSDC Commencement Monitoring (Building Control)

Appendix 4: Windfall Estimates for Years 1 to 5

This table summarises the data used to estimate a windfall allowance for the first five year period.

- "Commitments" are sites with extant planning permission or allocated in the Development Plan.
- "Historic windfall trends" are detailed in Section C of the main report. Past windfall delivery patterns are analysed and used to estimate windfall delivery in the next five years, including assumptions about the influence of the economy on the house-building industry.
- "Windfall delivery estimates" are detailed in Section D of the main report. Year-by-year projections of windfall delivery are provided for use in the Housing Trajectory. Existing permissions on windfall sites are discounted from these projections to avoid double-counting.

Commitments: Non-windfall	**Y 1-5 Total**	**Per annum**	***Commenced***	***Unstarted***	**Notes**
Large Sites *(Allocated without permission)*	365	73, 73, 73, 73, 73	*0*	*365*	Units allocated in the Development Plan (Local Plan & Small Scale Housing Allocations DPD) which have yet to gain Planning Permission.
Large Sites *(Allocated with permission)*	1294	278, 278, 278, 278, 278	*461*	*833*	Units with Planning Permission; arising from land allocated in the Development Plan (Local Plan & Small Scale Housing Allocations DPD).
Commitments: Windfall land	**Y 1-5 Total**	**Per annum**	***Commenced***	***Unstarted***	**Notes**
All Small Sites *(with permission)*	180	60, 60, 60, 0, 0	*89*	*110*	All small sites are defined as windfall as they are not allocated in the Development Plan.
Small Sites Garden land only (with permission)	71	24,24,24,0,0	*25*	*46*	All small sites, garden land only, are defined as windfall as they are not allocated in the Development Plan.
Small Sites Previously developed only (with permission)	109	36, 36, 36,0,0	*35*	*74*	All small sites, previously developed only, are defined as windfall as they are not allocated in the Development Plan.
All Large Sites *(with permission)*	1748	435, 435, 435, 435, 435	*330*	*1418*	Units with Planning Permission; arising from unallocated windfall land.
Large sites Greenfield only	1192	238, 238, 238, 238, 238	*271*	*921*	Units with Planning Permission; arising from unallocated windfall land, on greenfield sites.

(with permission)					
Large sites Previously developed only (with permission)	556	111, 111, 111, 111, 11	*59*	*497*	Units with Planning Permission; arising from unallocated windfall land, on previously developed sites.
SHLAA-identified *(Large Sites without permission)*	119	23, 23, 23, 23, 23	*0*	*119*	These units have been identified in the SHLAA. They do not have planning permission to date, but are assessed as being deliverable in the first five years. These units are known as "identified windfall" and should be discounted against any additional windfall allowance to avoid double-counting. This does not include garden land.
Windfall Estimate (Trend-based)	**Y 1-5 Total**	**Per annum**	***Commenced***	***Unstarted***	**Notes**
Small Previously Developed Windfall	280	**56, 56, 56, 56, 56**	-	-	Based on consistent past delivery of small previously developed windfall sites and their increasing trend during the last recession (2007 - 2011). Average of 70 dpa during last three years is higher than long term average of 56 dpa. Therefore an allowance closer to the longer term average of 56 dpa is considered appropriate for the next five years is considered reasonable.
Large Previously Developed windfall	625	**125, 125, 125, 125, 125**	-	-	See main report paragraphs 2.11 to 2.14.
Windfall Allowance (for Trajectory)	**Y 1-5 Total**	**Per annum**	***Commenced***	***Unstarted***	**Notes**
Small Previously developed Windfall Projection	112	**0, 0, 0, 56, 56**	-	-	Small previously developed windfall estimate is 280 in total or 56 dpa. 180 units are already permitted (Commitments) on small sites expected to be delivered in first 3 years (60 dpa) which is an element of double-counting. Subtract this to determine year-by-year small windfall allowance.

Large Previously developed windfall Projection	0	**0,0,0,0,0**	-	-	Large previously developed windfall estimate is 625 in total or 125 dpa. 1,748 units on large windfall sites with permission are considered to be deliverable within the first five years. This exceeds the estimate and so there is no justification for a windfall allowance on large sites in the first five years.

Notes

- Commitments and Commencement data are obtained from MSDC Commitments Monitoring 2013.
- Windfall figures are obtained from the Past Windfall Delivery Data in Appendix 1.
- The table only relates to sites (or parts thereof) deliverable in the first five years (Y 1-5).
- Small sites deliver 1-5 net units. Large sites deliver 6+ net units.
- Status of individual small sites is not monitored ("unknown"). Small Sites total (207) is expected to deliver in full: the figure includes a discount for non-delivery of 30% (see Commitments Monitoring for further information).

Appendix 5: Windfall estimate for the Ashdown Forest HRA Zone of Influence

A5.1 For detailed information on the European-protected Ashdown Forest or Habitats Regulations Assessment (HRA) 7km zone of influence, please refer to the District Council's website: http://www.midsussex.gov.uk/8270.htm

A5.2 This appendix aims to estimate the likely level of housing delivery over the District Plan Period (to 2031) within a 7km radius of the Ashdown Forest Special Protection Area (SPA). Long-term trends are analysed and used to estimate the level of housing delivery from Neighbourhood Plan allocations and windfall sites over the Plan Period.

Examination of results

	Past Completions (2001 to 2014)	Commitments (as at 1/4/2014)
District-wide Total	6,036	4,059
Zone of Influence	1,571	716
% in Zone of Influence	26.0%	17.6%

A5.3 Over the Study Period of 2001 to 2014 there were 1,571 residential completions located within the 7km zone of influence. This represents 26.0% of all completions; District-wide (6,036 units).

A5.4 MSDC Commitment Monitoring (1st April 2014) shows that 716 units are currently permitted or allocated within the 7km zone of influence. This represents 17.6% of all commitments; District-wide (4,059). Within the 716 commitments in the 7km zone of influence, 417 units are permitted on windfall sites (58%) and 299 are non-windfall commitments allocated in the Development Plan (42%).

Estimating future delivery

A5.5 To estimate the likely housing delivery within the zone of influence over the plan period, it is necessary to look at the likely level of housing requirement in the area, as directed by the District Plan through Neighbourhood Plan allocations, and also likely windfall delivery.

A5.6 The Pre Submission District Plan 2014 – 2031, published for consideration by the Council on 13th March 2015, set out draft housing land requirement figures for the Plan Period of 2014 to 2031. The draft housing land requirement is set out below, corrected to current figures:

District Plan Requirement	**11,050**
Completions 2014/2015	245
Total Housing requirement	10,805
Total Housing Commitments	5,504
Total to be identified	5,301
Burgess Hill strategic development	3,500
Remaining housing requirement (to be provided elsewhere in the district, as allocated through Neighbourhood Plans or other appropriate planning documents)	1,801

A5.7 The District Plan housing requirement is accounted for, except the 1,801 homes (to be allocated through Neighbourhood Plans or other appropriate planning documents)

- **Planned housing delivery**

A5.8 Past trends within the 7km zone of influence can be applied to the District-wide remaining housing requirement (1,801 homes) to estimate the level of housing delivery that will come forward within the 7km zone of influence.

A5.9 If future housing delivery follows the same historic-trend as 2001 to 2014 (see paragraph A5.3) then 26.0% of the remaining housing requirement will be located within the 7km zone of influence. This would be 469 homes. The proportion of current commitments within the 7km zone of influence is slightly less at 17.6%. If this current trend is used to estimate future housing delivery within the 7km zone of influence, it would be 316 homes.

A5.10 These two ranges give an average of 393 homes which could be used as a coarse-grained estimate of planned housing delivery through Neighbourhood Plans in the 7km zone of influence.

- **Windfall delivery**

A5.11 The District-wide Windfall Study found that 45 units per year could be delivered on small windfall sites over the 6+ year period. Given that housing delivery in the 7km zone of influence represents 26.0% of District-wide completions, the same proportion could be applied to windfall housing, indicating a total of 12 units per year would come forward over the 6+ year period.