

Date of Meeting 22<sup>nd</sup> June 2021

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

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## HELAA call for site submissions

### Report summary:

The Housing and Economic Land Availability Assessment (HELAA) is a key piece of evidence produced to support production of the Local Plan. This report sets out details of sites that were submitted into the East Devon call for sites process that ran from Jan – March 2021, which will feed into the HELAA process. It also asks the committee to agree a number of minor amendments to be made to the HELAA methodology to bring it in line with recent updates to Government guidance.

### Is the proposed decision in accordance with:

Budget Yes  No

Policy Framework Yes  No

### Recommendation:

- (1) That Strategic Planning Committee note the detail of the report.
- (2) That Strategic Planning Committee agree the proposed next steps and amendments to the HELAA methodology detailed in sections 3 and 4 of the report.
- (3) That delegated authority be granted to the Service Lead – Planning Strategy and Development Management in consultation with the Portfolio Holder for Strategic Planning, to make any further minor changes that might arise from a review of the methodology by the panel.

### Reason for recommendation:

To ensure that members are kept up-to-date with progress on work associated with the HELAA, and to ensure that the methodology for conducting the process is in line with current Government guidance.

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### Portfolio(s) (check which apply):

- Climate Action and Emergencies
- Coast, Country and Environment
- Council and Corporate Co-ordination
- Culture, Tourism, Leisure and Sport
- Democracy and Transparency
- Economy and Assets
- Finance
- Strategic Planning
- Sustainable Homes and Communities

## Financial implications:

There are no financial implications requiring comment

## Legal implications:

There are no legal implications from this information report

**Equalities impact** Low Impact

**Climate change** Low Impact

**Risk:** Low Risk; as members are being ask to note progress rather than make a decision.

**Links to background information** Planning Practice guidance on [Housing and Economic Land Availability Assessment](#): East Devon District Council [HELAA page](#).

### Link to [Council Plan](#):

Priorities (check which apply)

- Outstanding Place and Environment
- Outstanding Homes and Communities
- Outstanding Economic Growth, Productivity, and Prosperity
- Outstanding Council and Council Services

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## Report in full

### 1 [Introduction](#)

- 1.1 The Housing and Economic Land Availability assessment is an important source of evidence to inform plan production. The key role of the assessment is to identify a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. Whilst the assessment will provide information on the range of sites which are available for development, the Local Plan itself will determine which of those sites are the most suitable for allocation.
- 1.2 From 18<sup>th</sup> January to 15<sup>th</sup> March 2021, alongside the Local Plan Issues and Options consultation, East Devon District Council provided the opportunity for individuals and organisations to submit sites that they think have the potential to be developed for housing, economic or other uses.
- 1.3 Since the consultation closed, officers have been reviewing these sites ready for assessment work to commence. All of these sites have now been published on the [East Devon District Council HELAA page](#), alongside sites submitted back in 2017 in a similar exercise to support the Greater Exeter Strategic Plan.

### 2 [Site details](#)

- 2.1 The Council received a total of 359 site submissions, which is markedly similar to the 353 we received back in 2017. Of the 359, 194 of those are “new” sites and 165 were previously submitted to us in 2017.
- 2.2 For members benefit, a breakdown is shown below of the sites received in this exercise by parish area:

All Saints	2	Clyst St George	21	Kilmington	9	Seaton	8
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Awliscombe	2	Colaton Raleigh	4	Luppitt	0	Shute	0
Axminster	12	Colyton	12	Lympstone	13	Sidmouth	19
Axmouth	6	Combpyne Rousdon	0	Membury	2	Southleigh	1
Aylesbeare	14	Cotleigh	1	Monkton	2	Stockland	2
Beer	1	Cranbrook	2	Musbury	3	Stoke Canon	3
Bishops Clyst	14	Dalwood	0	Newton Popleford and Harpford	12	Talaton	4
Brampford Speke	0	Dunkeswell	2	Northleigh	1	Uplyme	2
Branscombe	3	East Budleigh with Bicton	1	Offwell	2	Upottery	0
Broadclyst	10	Exmouth	13	Otterton	3	Upton Pyne	3
Broadhembury	6	Farringdon	5	Ottery St Mary	17	Whimble	13
Buckerell	0	Farway	0	Payhembury	0	Widworthy	2
Budleigh Salterton	5	Feniton	6	Plymtree	2	Woodbury	24
Chardstock	3	Gittisham	4	Poltimore	2	Yarcombe	7
Clyst Honiton	14	Hawkchurch	2	Rewe	0	West Hill	12
Clyst Hydon	1	Honiton	11	Rockbeare	14	Clyst St Lawrence	0

2.3 The submitted sites are shown in a series of maps at the end of this report, alongside those submitted to us in 2017. It is also intended to show these in greater detail on the interactive map to be made available shortly on the [East Devon HELAA page](#). Whilst assessment work has only recently commenced on the sites submitted, members may wish to note that there has been a notable concentration of submissions, including three different proposals for new settlements, in the west end of the district.

### 3 Next Steps

- 3.1 As agreed in the report taken to this committee in December 2020, work has already commenced in undertaking assessments for the smaller sites submitted into the GESP call for sites back in 2017 and good progress has been made.
- 3.2 The latest call for sites has however, added an additional 194 sites which will require further assessment, which is a higher number than was originally anticipated when the timetable was originally set at the end of last year. This additional number of new sites will likely cause issues in getting feedback from the specialist consultees (namely Devon Highways and Education), who have previously advised that they require long-lead in times for feedback currently.
- 3.3 After officer assessment work has concluded, the next key milestone in the process is to hold a HELAA panel meeting. The panel comprises a group of key stakeholders who have a recognised interest in the development of land for housing and employment. Membership of the panel is representative of the broad cross-section of the housing and economic development sectors, including housebuilders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies.

- 3.4 The panel operates in an advisory capacity, making use of their specialist knowledge. Local authorities will identify whether sites are 'available' and 'suitable', and the panel will then advise on 'achievability', taking into account factors such as viability.
- 3.5 The original timetable envisaged that we would be able to undertake this in July 2021. However, in order for this to be held we require highways and education feedback beforehand for it to be taken into account at the meeting.
- 3.6 Following discussions, Devon County Council highways have been unable to commit to providing feedback by a particular date, only that they will work as quickly as they can within their current workloads. This presents an obvious challenge to our ability to forward plan completion of HELAA work, with potential knock on impacts on the overall Local Plan timetable.
- 3.7 A proposed solution is to ask Devon County Council to prioritise providing feedback on the larger sites and sites located within and on the edges of towns over smaller, more rural sites. We could then hold an earlier panel meeting specifically on these, with a meeting on smaller sites being held later on in the year. This would then allow us to have earlier feedback on the sites which will potentially be more important in the formulation of plan strategy.
- 3.8 If this route is taken, it is hoped that we should still have an appropriate level of site feedback available to inform the formulation of the draft Local Plan later this year and this need not delay the timetable. Progress will need to be monitored and the timetable kept under review.

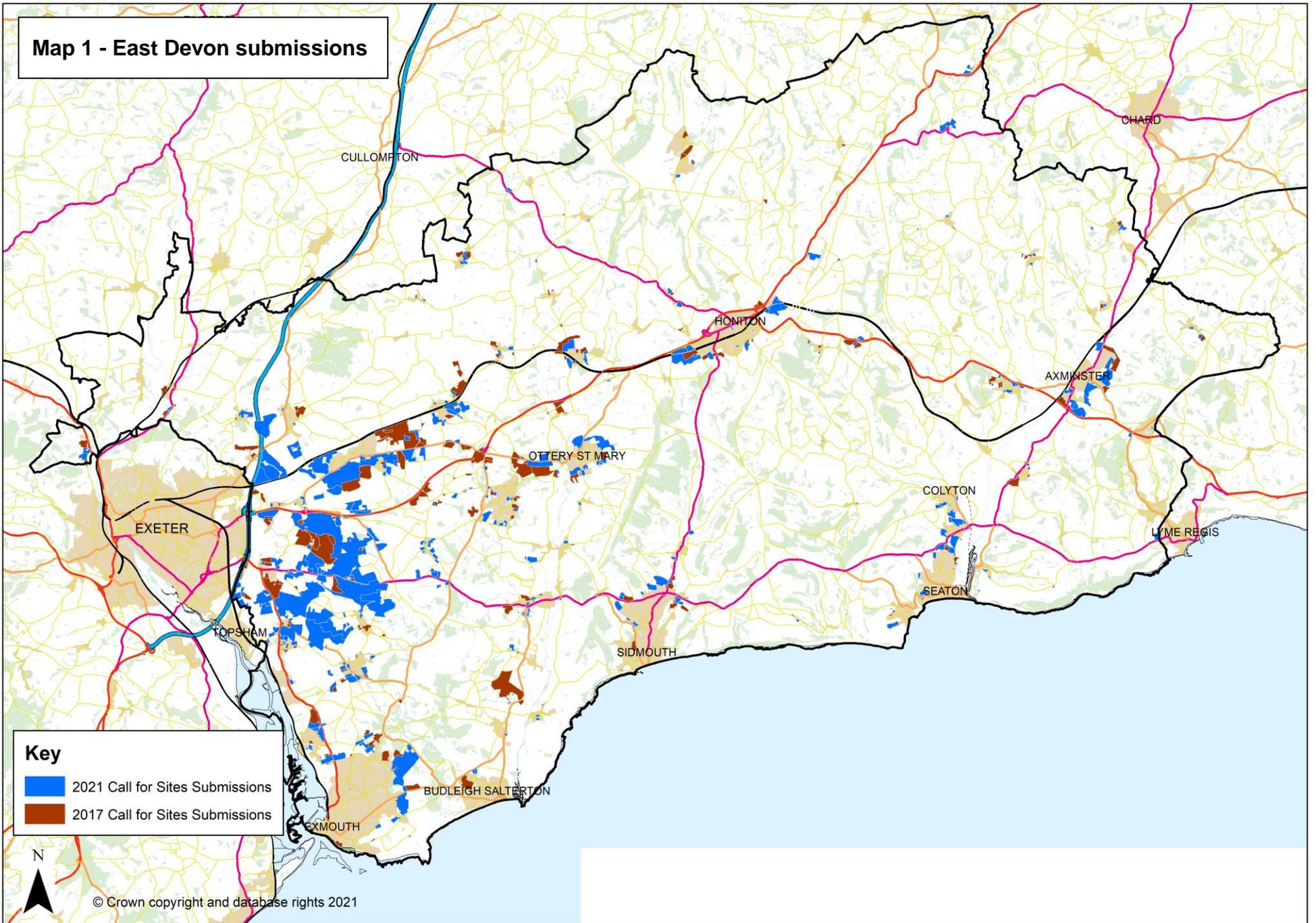
#### 4 Updates to HELAA methodology

- 4.1 The local authorities within the Exeter housing market area (Teignbridge, Mid Devon, East Devon and Exeter, with the addition of Dartmoor National Park Authority) have worked together since 2007 to produce a methodology for undertaking the HELAA (formally referred to as Strategic Housing Land Availability Assessments (SHLAAs)). This methodology is jointly published and was previously revised in 2013, 2015, 2016 and 2017.
- 4.2 Since the previous methodology was agreed in 2017, a number of changes in national policy and planning practice guidance have meant that further minor technical updates are necessary to take these into account. The opportunity was also taken to review and amend other elements of the methodology, where issues had been identified in the past from previous assessments. For members information a copy of the proposed updated methodology can be found in appendix 1. A summary of the proposed main changes are shown below.
- Appendices 2, 3 and 4 updated to reflect latest guidance on deliverability / developability in the NPPF and PPG.
  - Removal of appendix 5 and additional paragraph 7.5 added on how all self-contained and communal accommodation is considered in housing delivery supply, to bring in line with housing delivery test rulebook.
  - A number of paragraphs and tables simplified and incorporated into paragraph 5.10 to allow greater flexibility when considering gross-to-net employment ratios, to allow individual authorities to apply their own based on local evidence.
  - Stage A assessment updated to remove consideration of national guidance on the sustainable location of development, as this is considered in greater detail throughout stage B.

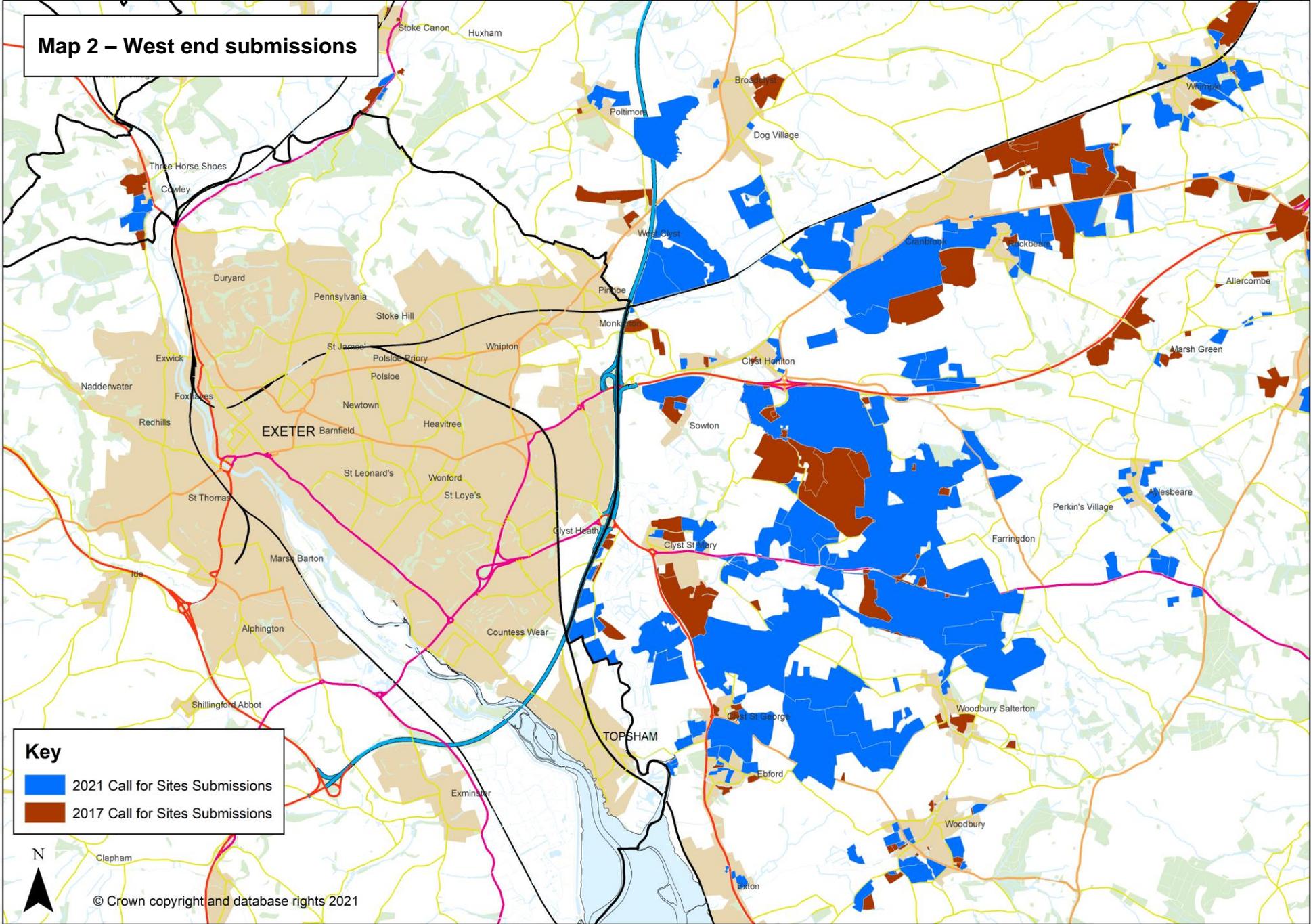
- Amended guidance to clarify how to consider flood zones in Stage A assessment where no data on functional floodplains exist.
- Housing densities for suburban / rural settlement development and new communities amended based on updated evidence.

- 4.3 Members may also note that reference to Teignbridge District Council has now been removed from this version. Teignbridge District Council have already largely completed their latest HELAA and the changes proposed by the remaining partners had the potential to conflict with work they had already undertaken. Consequently, they have decided to publish a separate updated methodology on this occasion.
- 4.4 Members are asked to agree the above changes. The revised methodology will then go on to be discussed at the inception meeting of the HELAA panel later this year. It is possible that this discussion may result in some additional amendments to be made to the methodology. In order to avoid having to take these back to this committee, it is requested that delegated authority be given to the Service Lead – Planning Strategy and Development Management in consultation with the Portfolio Holder for Strategic Planning to make any further minor changes that might arise from this.

# Map 1 - East Devon submissions



# Map 2 – West end submissions



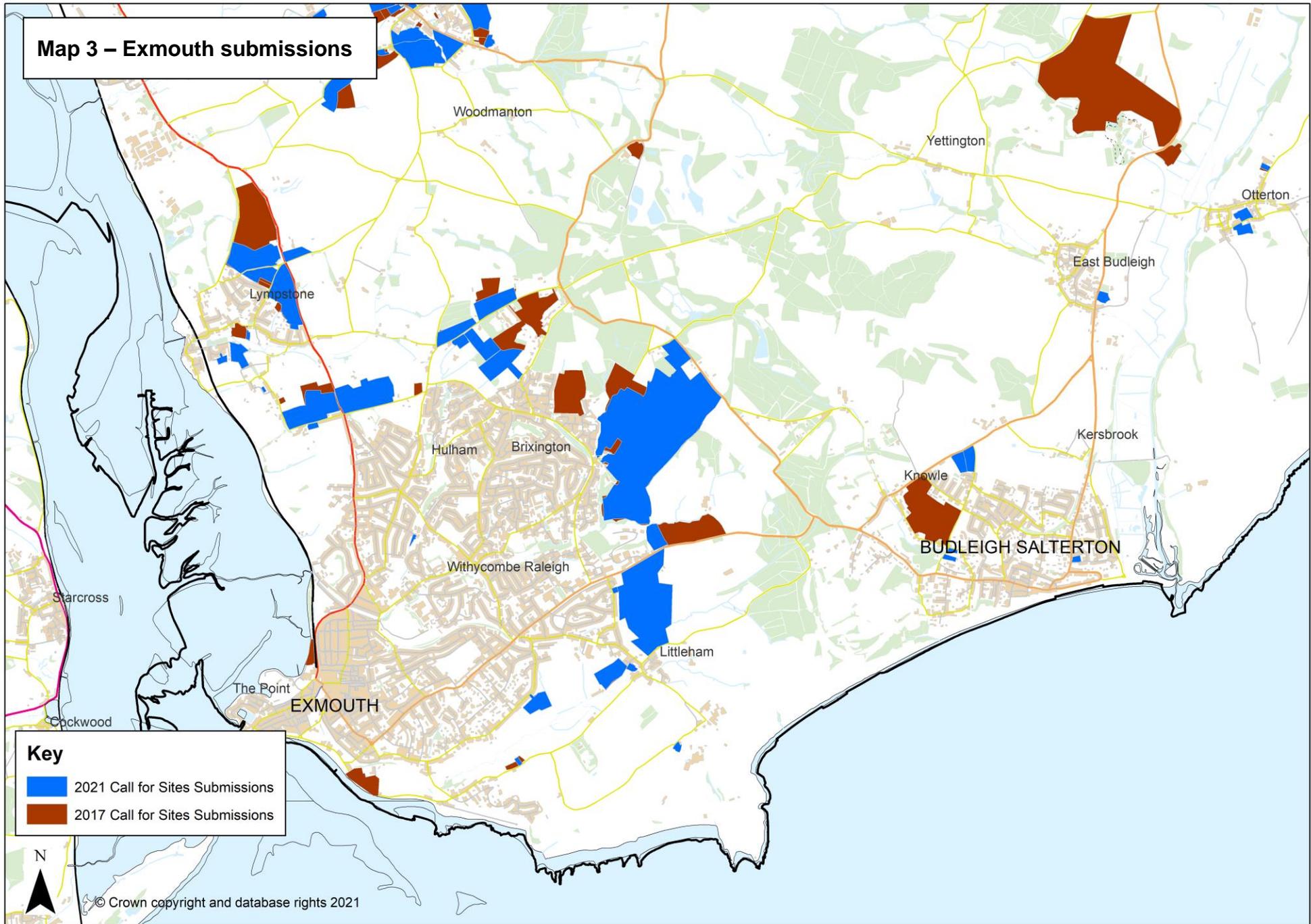
**Key**

- 2021 Call for Sites Submissions
- 2017 Call for Sites Submissions



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### Map 3 – Exmouth submissions

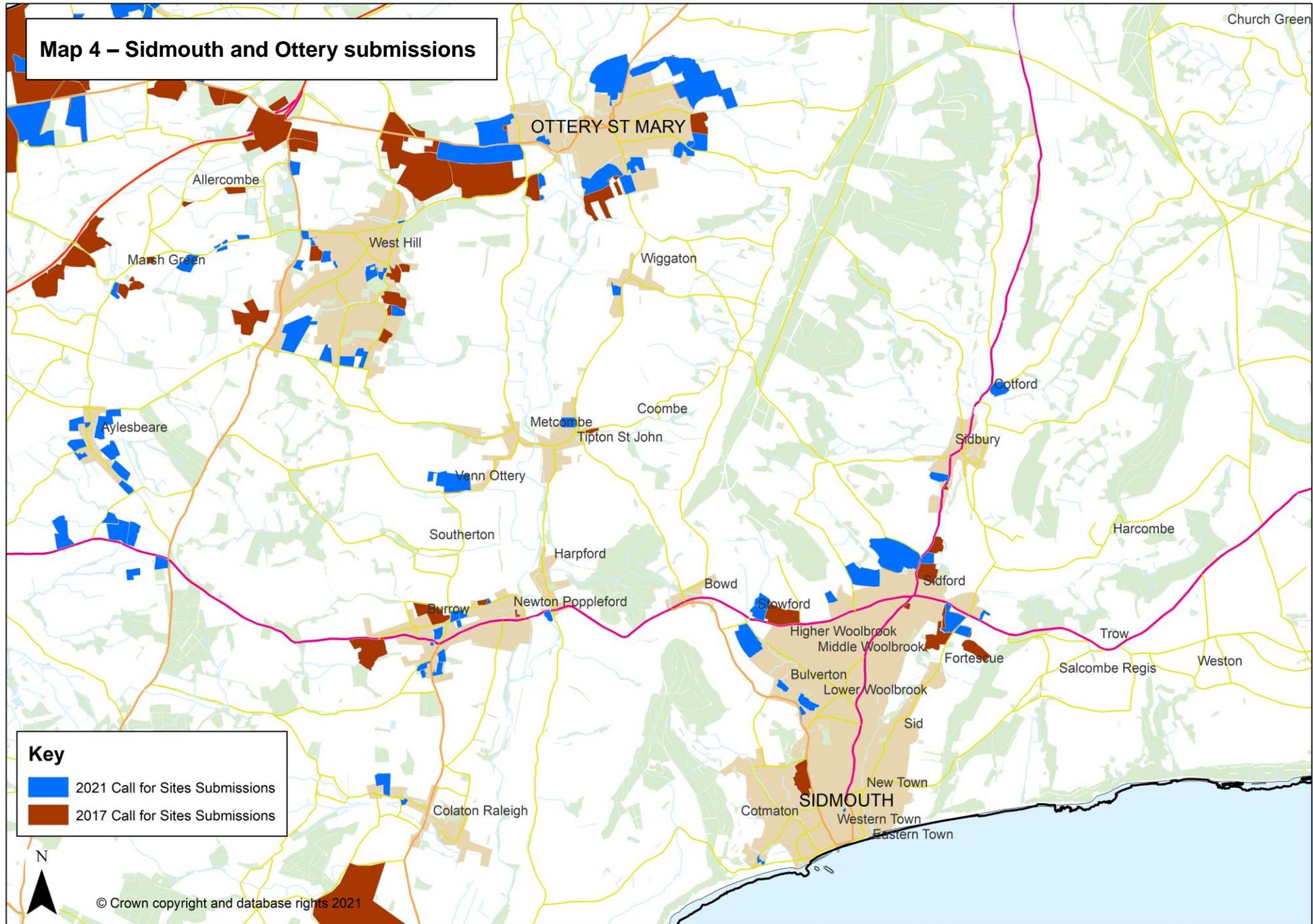


#### Key

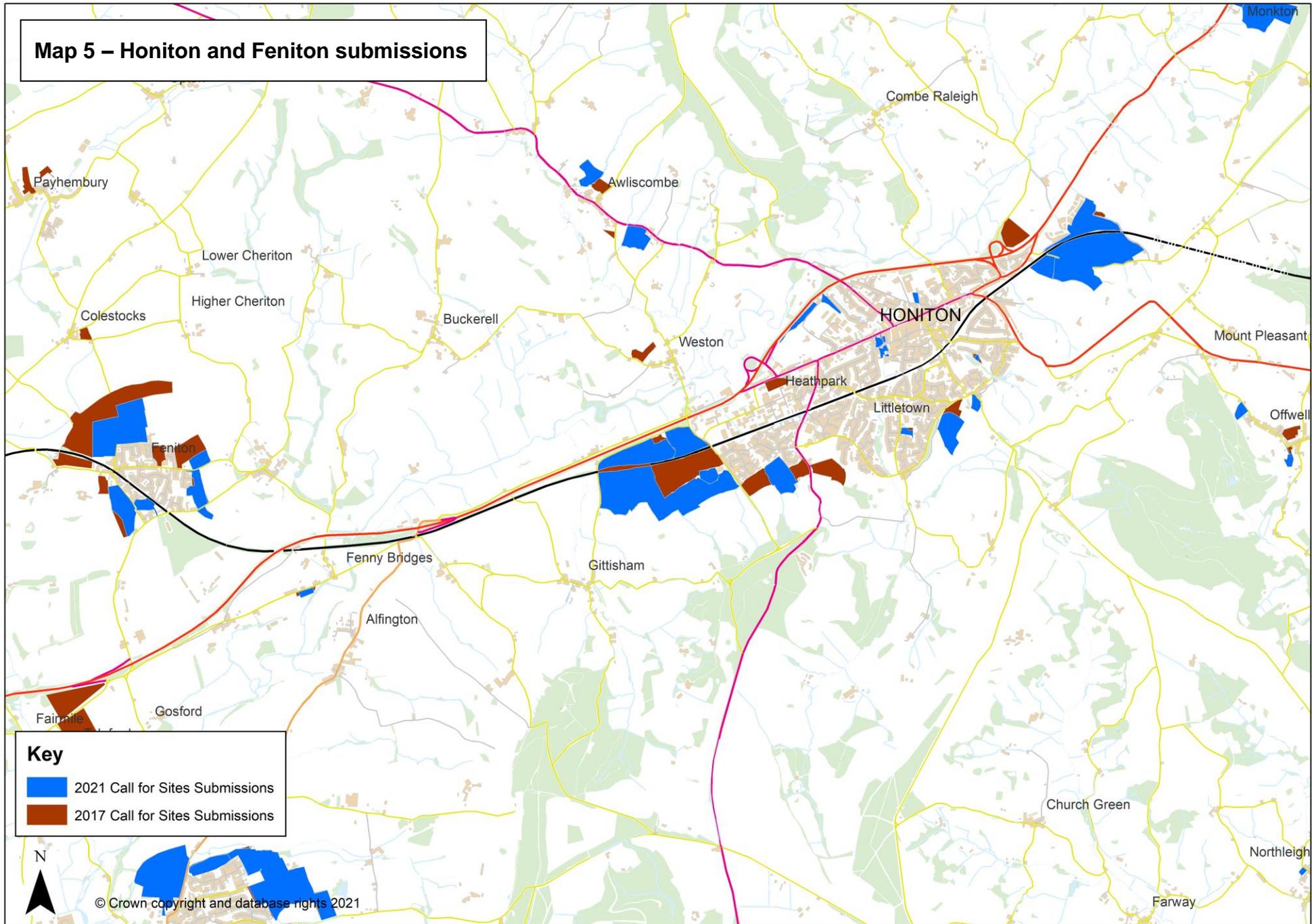
- Blue: 2021 Call for Sites Submissions
- Brown: 2017 Call for Sites Submissions



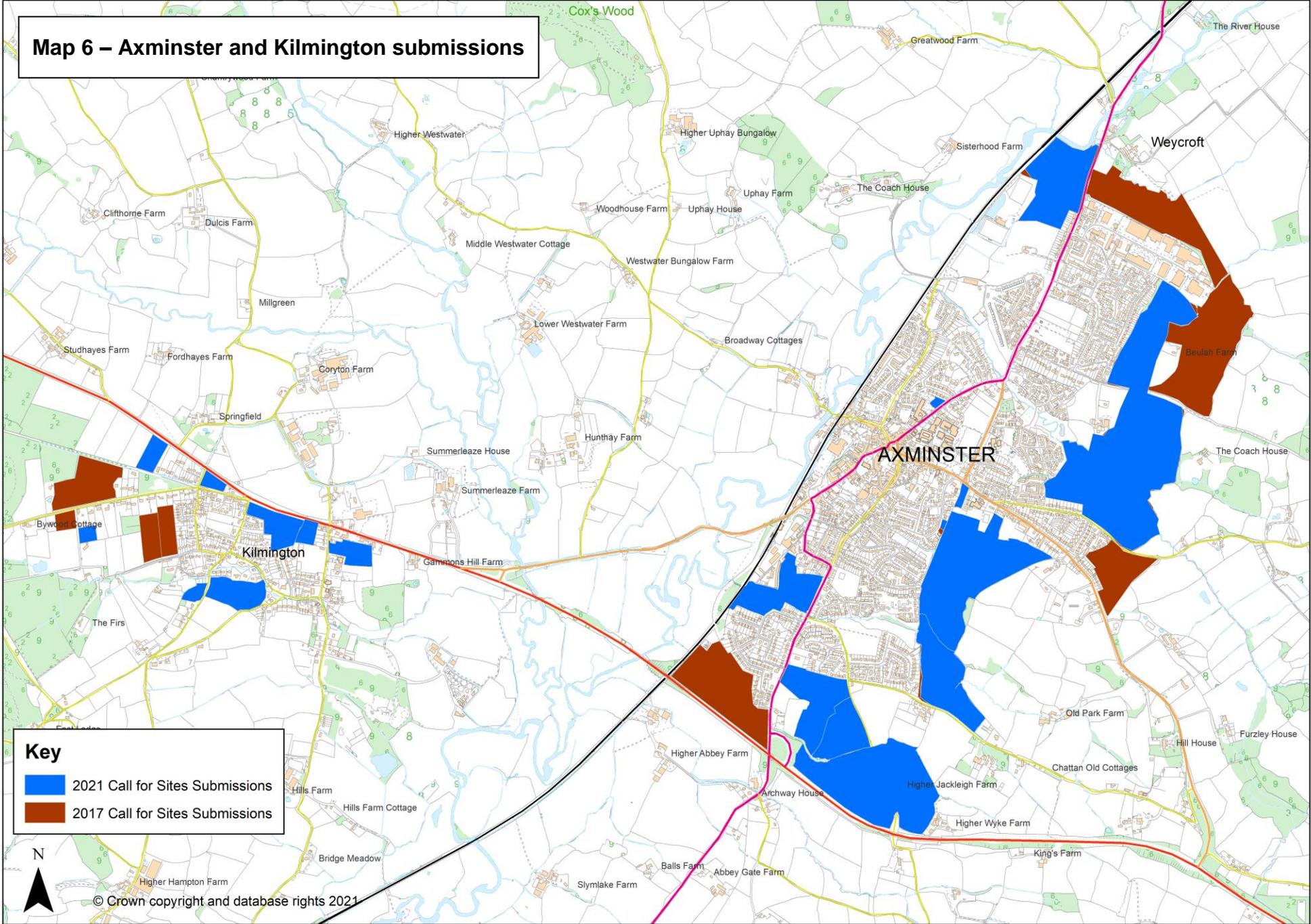
# Map 4 – Sidmouth and Ottery submissions



# Map 5 – Honiton and Feniton submissions



# Map 6 – Axminster and Kilmington submissions



**Key**

- 2021 Call for Sites Submissions
- 2017 Call for Sites Submissions



# Map 7 – Seaton and Colyton submissions

