

Date of Meeting 08 March 2022

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Exemption applied: None

Review date for release N/A

Call for Sites

Report summary:

This report sets out proposals for a further 'call for sites' as part of the work on production of an addendum/additional work to the current Housing and Employment Land Availability Assessment (HELAA) that is in production. The HELAA will provide a schedule of possible development sites to be drawn on to inform development allocations in the emerging new local plan for East Devon. A 'call for sites' provides an opportunity for anyone to identify (and inform the Council) about any land areas that they consider could be appropriate for future development. It is highlighted at the outset, however, that the owner or owners of the land need to give their consent for the land to be submitted and considered.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee:

- 1) **Endorse the proposal for a further call for sites to support production of the Housing and Employment Land Availability Assessment**
- 2) **Delegate authority to the Service Lead – Planning Strategy and Development Management to undertake this work.**

Reason for recommendation: To ensure that Members have given consideration to and provided endorsement of a further 'call for sites'.

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Portfolio(s) (check which apply):

- Climate Action
- Corporate Services and COVID-19 Response and Recovery
- Democracy and Transparency
- Economy and Assets
- Coast, Country and Environment
- Finance

- Strategic Planning
- Sustainable Homes and Communities

Equalities impact Low Impact

Climate change Low Impact

Risk: Low Risk;

Links to background information – See links in the attached the report.

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

1 Introduction

- 1.1 Members of committee will be aware that there is a Housing and Employment Land Availability Assessment (HELAA) that is in production. The full HELAA making process is not simple or quick and the current work draws on ‘calls for sites’ that were undertaken in 2017 and 2021. However the current round of HELAA is now drawing close to a conclusion with a final report scheduled to come to Strategic Planning Committee on the 5 April 2022.
- 1.2 Whilst this current HELAA report with full output details is awaited it has generated a body of information, that is currently available and in the public domain that has helped thinking on local plan preparation to date. Of most importance we have site boundaries and some understanding about land areas that have been identified by land owners (or agents acting for them) that have been promoted for development up to this point in time. In total over 350 sites have been promoted for development and form part of the HELAA work.
- 1.3 Officers have drawn on the sites that have been submitted for development and have undertaken initial policy related site assessment work. It was this assessment that informed possible land allocations that have been identified in the local plan paperwork that has been considered by Strategic Planning Committee over recent months.
- 1.4 The expectation, whilst not wanting to pre-empt HELAA findings, is that there will be sufficient quantities of land that will meet technical tests for development that have come through HELAA submissions to date to meet and exceed housing requirements for the local plan. However, this does not mean that the sites will be intrinsically good and desirable sites for allocation in the plan and furthermore, even if allocated, they may not be deliverable in the early years of the future local plan and as such the Council could be vulnerable to not having a five year land supply. It should also be noted that limited submissions have been made for specialist housing types, perhaps most starkly land for

gypsy and travellers. In addition we would flag up concerns that comparatively few sites have been promoted for employment uses and concerns that might arise over whether there is a sufficient quantity of land that might be available (and which would make good planning choices for allocation) to meet future employment needs or aspirations in East Devon.

2 A further call for sites and a targeted approach

- 2.1 In recognition of identified concerns about the choice of potential sites to draw on when making land allocations for development in the emerging local plan (particularly noting points raised at Strategic Planning Committee on 22 February 2022) it is appropriate to undertake a further call for sites. The hope is that a further call for sites will help identify additional sites and land areas that can feed into overall assessment work and which may ultimately become good or appropriate land areas to allocate for development in the new local plan. Though it does remain to be seen how many extra submissions might be made.
- 2.2 In the further call for sites it will be appropriate to allow anyone to promote any land area in East Devon for development. There is an across authority (East Devon, Exeter, Mid Devon and Teignbridge) agreed methodology for HELAA work that provides for this. However, it will also be appropriate for the Council to 'target' certain geographical areas and land uses as potentially appropriate for development where we would particularly encourage site submissions. Key targeted area/use types are identified below.
- 2.3 **Sites on the western side of East Devon** – the working draft local plan identifies the western side of East Devon as potentially appropriate for a substantial amount of future development. Whilst there are a large number of sites that have already been submitted into the HELAA work on this western side of East Devon a new call for sites may yield further options.
- 2.4 **Local plan – tier 1 to 4 settlements** – emerging strategy identifies a number of towns and villages, falling into Tiers 1 to 4 of the working draft local plan, as being suitable in principle for further development. Settlements in Tiers 1 to 4 have a range of services and facilities that would provide for many of the day-to-day needs of people meaning that they would not need to travel elsewhere, or at least not to be car dependent (i.e. public transport is at least reasonably good). It would be desirable to encourage further site submissions at the tier 1 to 4 settlements.
- 2.5 **Brownfield sites** – In the tier 1 to 4 settlements it will be appropriate to seek to encourage more brownfield sites to be promoted for development. Whilst it needs to be recognised that East Devon does not have substantial areas of brownfield land (it does not for example have an historic industrial legacy) there are brownfields land areas that may have scope for development and reuse that may not have been submitted in call for sites to date. Seeking to encourage brownfield site submissions would be appropriate.
- 2.6 **Regeneration and intensification opportunities** – there are some areas of land and buildings, that might be in use, but which are potentially underused or underutilised that may offer scope for more intensive use. In some cases these may fall in or close to a 'brownfield' status and in other cases they maybe productively used but perhaps not as productively as may be possible. It would be appropriate (again at locations listed above) to encourage sites where an intensification of activity could be possible, for example past

suggestions have been made around potential for redevelopment of shopping centres (perhaps new flats above shops) or decking of car parks (parking below and flats above). As a 'health warning to both regeneration/intensification opportunities and also potentially for brownfield land reuse there is the need to be aware of a concern around losing a productive land use, for example that provides employment, to another use, specifically housing. Such losses could have negative impacts in their own right and if for example they mean needing to find new sites for displaced uses they could present significant challenges in respect of finding land for and delivering relocations.

- 2.7 **Sites for small scale housing developments** – there is an expectation in national policy for the allocation of land to accommodate small scale housing developments. At locations detailed above it would be appropriate to encourage smaller scale sites to be submitted.
- 2.8 **Land for non-housing uses, especially employment uses** – in past calls for sites there has been the opportunity for people to identify a range of possible uses for promoted land. Most submissions have, however, sought residential development. We do not yet have quantified levels of need or demand for employment uses, though we do have an Economic Development Needs Assessment that is being produced that will set out quantified amounts, but it will not report back until summer 2022. However, we are aware that there have been comparatively few submissions for employment or other land uses and there could be a mismatch between appropriate levels of provision to plan for in the new local plan and sites that could actually match needs.
- 2.9 **Gypsies and traveller sites** – following on from the above there has been a long standing challenge of identifying sites for accommodating gypsy and travellers. Very few past submissions have promoted land for this sector of our community and it would be appropriate to encourage such submissions.

3 The engagement we would plan to undertake

- 3.1 In past calls for sites we have been in contact with land agents and bodies that we are aware have prompted land for development as well as people and organisations that have been on contact lists for HELAA work and local plan mailing lists. We have advised of the call for sites on the Council web site and also done so in press-releases and more general communications about our plan making work.
- 3.2 Whilst we have 'covered all the regular bases' in past calls for sites there is scope to be more proactive in terms of our engagement on future work. Set out below are some additional ways (in addition to those listed above) that we identify could be useful mean to hopefully encourage more site submissions.
- 3.3 **Press releases and media coverage** – we would aim to get greater press coverage for the new call for sites and can look at social media and other new ways of communicating.
- 3.4 **Contacting parish and town councils** – we would want to explicitly contact parish and town councils to seek to encourage them in identifying possible development sites and engaging with their residents, communities, businesses and other constituents to identify and submit sites that may offer scope for development. We would want to open up opportunities to parish and town councils to lead on local scale engagement to reach out to

their communities, whether through local contacts, word of mouth, parish newsletters, flyers, etc., and encourage submission of potential sites.

- 3.5 **Contacting public bodies** – a number of public bodies own areas of land but they do not necessarily actively promote them for development. By targeting public sector bodies specifically it may help promote more site submissions. It should be noted that amongst the bodies that we would plan to contact would be differing departments and services of East Devon District Council. Some of these maybe land owners in their own right and others may have close contact with bodies and organisations that own land.
- 3.6 **Contacting chambers of commerce and business owners** – in past calls for sites contact has been made with land agents and organisations that are directly involved in promoting land for development, such organisations remain a key point of contact. However, a broader scope of contact with business bodies might generate more submissions from a broader spectrum of commercial organisations.
- 3.7 **Contacting the NFU and Country Land and Business Association** – it is considered that these groups which represent land owners of much of the rural land in the district may be able to highlight the call for sites among their Members such that further land may come forward that was not previously identified.

4 Timetable for work ahead

- 4.1 Subject to committee endorsement we would wish to move swiftly with the call for sites and associated HELAA work. To that end we would envisage a six week period in which sites could be submitted, starting in mid-March 2022 and running to late April 2022. We would then allow for around six weeks for officer collation and assessment of sites submitted before sites would then be sent to the HELAA panel, for a similar time period, for their formal assessment before feedback comes back to Council officers. This would take us to mid-July 2022, i.e. the start of around the time of school summer holidays. Over the rest of July and August HELAA feedback would be incorporated into a final report the contents of which would be reported to Strategic Planning Committee and used to inform proposed land allocations in the proposed consultation draft local plan that is planned to come to members in early autumn 2022 with a recommendation for consultation.
- 4.2 This further consultation should be seen within the context of the existing HELAA work. This existing work will generate a report (for Strategic Planning Committee in April 2022) and the new call for sites, along with refinement of existing site data held - including chasing up any absent information, will allow for old and new submissions to sit alongside one another in a final HELAA report.

5. Resources

- 5.1 There is a lot of work involved in a further call for sites and the assessment of further sites coming forward through both officer assessments and the HELAA panel. It is generally accepted however that this is work that is necessary and will need to be completed at some point during the remaining plan production work programme.
- 5.2 There is still a huge amount of work involved in establishing the evidence base and drafting the draft local plan for consultation. This work will need to be completed before the autumn

consultation on the draft plan can start. Completing a call for sites at the same time as doing this work rather than after it is complete (i.e. doing the call for sites alongside the draft plan consultation) presents some challenges and adds to the risk of this timetable not being achieved. This will also be affected by other factors such as our ability to fill the remaining vacant post in the Planning Policy Team and how smoothly the various work streams progress. At this stage it is difficult to quantify the likely impact of the call for sites being carried out now and instead it is recommended that regular updates to the timetable be brought to the committee with the relevant risks highlighted. This will enable Members to monitor progress and understand potential impacts on the timetable.

Financial Implications

There are no direct financial implications.

Legal Implications

There are no legal implications from this information report.