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2022 East Devon Housing and Economic Land Availability Assessment – Interim results

Report summary:

This report seeks to inform Members of the interim results of the draft 2022 East Devon Housing and Economic Land Availability Assessment (HELAA) Part 1, which are set out in Appendix 2 attached, and summarised in this report to Committee. Part 1 assesses sites identified from the 2017 and 2021 Call for sites submissions. Applying the HELAA methodology, previously endorsed by Committee, results in the HELAA-Part 1 report identifying a significant amount of land as being available, suitable, and achievable in the district.

Members are advised that further HELAA work continues, assessing other sites in East Devon including submissions from the current 2022 Call for sites. A HELAA - Part 2 report will follow later this year. It will also provide combined housing and employment delivery trajectories for the District from the Part 1 and Part 2 sites. Members' views on and endorsement of the combined HELAA Parts 1 and 2 for use as evidence will be sought at that stage.

As part of the technical evidence required by NPPF for plan-making purposes, the HELAA enables the local planning authority to have a clear understanding of the land available in East Devon. The HELAA does not select sites for allocation in the Local Plan but will be a primary source of data to help inform the assessment of sites for selection as allocations. The two work streams are being coordinated and prioritised. In a separate report to this Committee, Members views are being sought on the approach to the site selection process for allocations.

Is the proposed decision in accordance with:

Budget Yes No

Policy Framework Yes No

Recommendation:

That Strategic Planning Committee:

1. Note the results of the interim 2022 East Devon Housing and Economic Land Availability Assessment report (Part 1).
2. Note that there will be a further report to Committee in late summer/early autumn 2022 on the 2022 East Devon HELAA report - Part 2. This will assess additional sources of potential housing and economy led sites, including those from the current 2022 'call for sites'.
3. Notes that the HELAA reports (Parts 1 and 2) will be combined to identify the net supply from available, suitable and achievable sites to provide the East Devon HELAA housing and employment trajectories. The combined report will be technical evidence to inform the preparation of the emerging East Devon Local Plan, and for development management purposes.

Reason for recommendation:

To ensure that Members have given consideration to the 2022 East Devon Housing and Economic Land Availability Assessment report - Part 1 and are informed of the need to produce the 2022 HELAA report -Part 2 and to consider that report later this year.

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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 report.

Link to [Council Plan](#):

Priorities (check which apply)

- Better homes and communities for all
- A greener East Devon
- A resilient economy

1 Introduction

- 1.1 The District Council is responsible for preparing and keeping up to date a Housing and Economic Land Availability Assessment (HELAA) to help inform future plan making in East Devon. The National Planning Policy Framework (NPPF) requires local planning authorities (LPA) to have a clear understanding of the land available in their areas.
- 1.2 The HELAA identifies a future supply of land in a plan area that is suitable, available and achievable for housing and economic development over the plan period. The assessment incorporates the Strategic Housing Land Availability Assessment (SHLAA) requirement of the NPPF (paragraph 68). In short, a HELAA should:
 - Identify sites/broad locations with potential for housing and economic development

- Assess their development potential and
- Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

1.3 The HELAA report is technical evidence and part of the evidence base to justify policies in development plans for housing and economic development. It is an important first step in the process used by the LPA to plan proactively by identifying potential sites that could go forward into the Local Plan to meet housing and employment needs.

1.4 Production of and outputs from the HELAA report are complex and can be daunting as:

- Assessments are detailed, consistent with current Planning Practice on HELAAs
- This is a huge area of work with 682 sites in East Devon (net total of 552) being identified and assessed to date. 359 of those sites, including 83 strategic sites, are from the 2017 call for sites, together with 193 new sites and 130 resubmitted sites from the 2021 call for sites
- There will also be other sites to assess, including those that will come through the current call for sites
- Many 'resubmitted' sites had amended boundaries or development proposals
- The multiple overlaps of sites adds to the HELAA's complexity, but have had to be identified and an assessment made of which sites or parts of sites to count. This is necessary to avoid double counting the housing and employment land identified as suitable, available and achievable.

1.5 The full HELAA process is not simple or quick. It should be noted that figures may change, and indeed have changed throughout the process as new sites have been put forward or been withdrawn, or judgements changed. HELAA results are therefore a snapshot in time.

2 Responsibility for the assessment

2.1 The Local Planning Authority is responsible for processes to identify sites, for undertaking the assessment and producing the resultant HELAA report as evidence for plan-making and development management purposes, including the site assessments.

2.2 Members are reminded that the HELAA Panel provides expert views on site achievability (more on this in Section 7 of Appendix 1 appended to this report to Committee) but the Panel is not responsible for the overall HELAA. This is in accordance with the HELAA Panel Constitution and Terms of Reference, which Members endorsed at their 7 September 2021. Meeting.

3 Approach to the East Devon HELAA – an insight

3.1 Appendix 1 to this report to Committee focuses on giving Members an insight into the approach to the HELAA focussing on the following matters:

- Producing the HELAA report in stages (*see section 1 of Appendix 1*)
- HELAA methodology (*see section 2*)
- Site size and the HELAA assessment area (*see section 3*)
- Site identification -sources of potential sites (*See section 4*)
- 2017, 2021 and 2022 Call for Sites (*see section 5*)
- Site assessments (Availability, Suitability and Achievability) (*see section 6*)
- The HELAA Panel (*see section 7*)

3.2 Although these are technical aspects, they are the principal matters which determine the interim HELAA results, emerging conclusions, implications and the need to manage risks. It is vital that the HELAA evidence is robust and proportionate if the Council is to rely on the HELAA as part of the audit trail of evidence used to justify Local Plan policies.

4 Interim results - HELAA Report- Part 1

4.1 The current assessment of potential sites has progressed to the stage where detailed assessments relating to the 2017 and 2021 Call for sites can be set out in the draft interim 2022 East Devon HELAA – Part 1 report (*see Appendix 2 appended*). That report is an opportunity to present output to Members as early as possible.

4.2 Part 1 also identifies matters where there is still ‘work in progress’. The intention is for the outcome of that work to be presented to Members in a forthcoming 2022 HELAA Part 2 report about the outcomes of HELAA work on:

- The identification, survey and assessment of :
 - Other sources of sites (*see Section 4 of Appendix 1*)
 - The 2nd East Devon Call for sites (Members have been notified that the 2nd Call for sites has commenced, and is for a six week period)
- Housing and Employment trajectories – forecasting the delivery of available, suitable and achievable sites identified through the HELAA reports – Parts 1 and 2

4.3 Part 1 is therefore an interim report because some of the analysis, notably supply counts, will be superseded when evidence from the HELAA report Part 2 is taken into account.

4.4 The following key housing results are drawn from the Interim Draft HELAA report – Part 1 set out in Appendix 2 to this report to Committee:

- a) Number of site submissions from the 2017 and 2021 Call for Sites
- b) Stage A criteria - sites meeting and sites not meeting the criteria
- c) Site Assessments – sites available and suitable (net of overlaps and excluding those parts of 2017 non-strategic sites not resubmitted)
- d) Available sites meeting all Stage B criteria for suitability, that are achievable (net of overlaps and excluding those parts of 2017 non-strategic sites not resubmitted)
- e) Sites not meeting Stage B suitability criteria or not achievable
- f) Net housing capacity supply from available suitable and achievable :
 - Including/Excluding sites in the Cranbrook DPD plan area
 - By parish

a) The number of site submissions from the 2017 and 2021 Call for Sites

4.5 Section 5 in Appendix 1 to this report to Committee provides more details about the Call for Sites which invited landowners to submit potential development sites to be considered through the HELAA process.

4.6 The Council has made efficient use of information about East Devon sites already available from the previous 2017 Call for sites. The GESP HELAA report, with its appendices includes

the assessment of 83 strategic sites in East Devon (see Appendix F of that report, and can be viewed online at [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk) A further 276 sites in East Devon were submitted in 2017, but not assessed at that time.

- 4.7 Following Members decision at their December 2020 meeting, the Council has undertaken the recent 2021 East Devon Call for sites. This was necessary to demonstrate that the LPA has been proactive in identifying potential sites that can be considered for housing and employment development. It is consistent with PPG on HELAA regarding the role of the Call for sites process as a means to enable sites to come forward at an early stage to inform preparation of the emerging East Devon Local Plan.
- 4.8 The number of sites submitted and identified is important. A low number could limit the range and choice of sites for plan-making purposes and constrain the ability of the plan to achieve strategic objectives, including delivering planned growth. It might lead to a risk of the Council being perceived as not sufficiently proactive, and the HELAA evidence being less than robust.
- 4.9 It is also essential that all sites submitted through the Call for sites are identified, accounted for, and reported in the HELAA report, to ensure that the East Devon HELAA process is robust. Without careful accounting there could be a risk of challenge through the plan making process, or at the Examination, or possibly through the Legal Challenge process. Therefore there are a suite of appendices in the HELAA part 1 report which account for all submitted sites.

2017 Call for sites

- 4.10 Through the 2017 Call for sites undertaken by the GESP Authorities a total of 359 sites were submitted in East Devon. 83 of these were assessed as having the potential for 'strategic scale' development defined as
- **In or next to Exeter:** a site (or combination of adjoining sites) that is potentially capable of accommodating around 100 or more homes, or that measures around 2 hectares or more and has been promoted in the Call for Sites for economic development or has been identified by the GESP authorities¹ as having strategic economic development potential.
 - **Outside Exeter:** a site (or combination of adjoining sites) that is potentially capable of accommodating around 500 or more homes, or that measures around 5 hectares or more and has been promoted in the Call for Sites for economic development or has been identified by the GESP authorities as having strategic economic development potential.
- 4.11 18 of the 83 sites were submitted for employment led development, the other 65 were submitted for housing or mixed use including housing. (See Appendices in the appended 2021 HELAA report)
- 4.12 Of the 359 sites in East Devon identified as submitted through the 2017 Call for sites:
- 83 sites were classified as 'Strategic sites' which were assessed in 2019. The assessments were published on the GESP website (see Appendix F) at [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk) . Generally, these sites have not been reassessed – and the HELAA relies on the assessments published in 2019. The availability of these 83 sites was checked in February 2022, confirming that:

¹ East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, working in partnership with Devon County Council.

- 44 of the 83 sites were either resubmitted in 2021 (some with modified site areas and/or boundaries), or indicated that they wanted to participate in the presentations to Strategic Planning Committee in January 2022, implying that the sites remained available.
- In February 2022, officers contacted the submitters of the other 39 sites to check whether they remain 'available'. 31 have confirmed that their sites remain available; 4 have confirmed that their sites are no longer available, and 4 have yet to respond.
- 146 sites were not assessed in 2019 and have not been resubmitted. These have now been assessed – with the Assessments set out in an Appendix in the draft interim HELAA report - Part 1 (*appended*). Further work is needed to check that these 146 sites remain available (*to be reported in the HELAA report – Part 2*)
- 130 sites were not assessed in 2019 but have been resubmitted (some with modified site areas and/or boundaries) (*see paragraph 4.12 below*)

2021 Call for Sites

4.13 In January 2021, the Council notified previous submitters of the new 2021 Call for Sites and invited them to resubmit their sites for consideration (with a deadline of 15 March 2021)

4.14 323 sites were submitted through the 2021 Call for sites, using either the on-line submission mechanism or notifying the Council of their submissions, with officers recording that information in the HELAA database. Of these 323 sites:

- 193 were new sites submitted only in 2021. The site assessments made in 2022 are set out in an Appendix in the draft interim HELAA report - Part 1 (*appended*).
- 130 sites were 'resubmissions' having previously been submitted in 2017. Some of these resubmissions had area or boundary changes compared to 2017, which is taken into account in the site assessments made in 2022 –set out in an Appendix in the draft interim HELAA report - Part 1 (*appended*)

TOTAL number of sites from the Call for sites

4.15 It is this sheer volume of identified East Devon HELAA sites which has generated the huge amount of work to record, check for overlaps, and to assess the sites. This doesn't include any sites coming forward through the current 2022 Call for sites.

4.16 Overall, a total of 682 sites in East Devon have been identified as having been submitted through 2017 and 2021 Call for sites for assessment. This is a significantly large number of sites which were put forward that needed to be recorded, assessed and analysed.

Overlap, cut outs and residues

4.17 The volume of HELAA work has been exacerbated and complicated by the many site overlaps, in whole or part which have had to be identified and the impact assessed. These can be seen on the maps of sites in Appendices in the HELAA report – Part 1. They can be viewed online on the Interactive map at

[Housing and Economic Land Availability Assessment - East Devon](#)

4.18 The multiple overlaps of submitted sites is also being taken into account in the HELAA in order to avoid double counting the housing and employment land that is suitable, available

and achievable, for the calculation of net potential housing and employment land supply and in the trajectories.

- 4.19 Likewise, the 130 sites submitted at 2017 and then resubmitted at 2021 are only counted once, although mindful that the resubmissions can have different boundaries and site areas, and potentially may propose other uses. A general rule has been applied to resubmissions of the 2017 sites, whereby if both the 2017 and the 2021 submissions were submitted by or on behalf of the same owner(s) and if there is a residue of the 2017 site that was not resubmitted, then it is reasonable to assume that the 2017 residue is no longer being promoted as available, and is therefore discounted from the supply analysis.
- 4.20 It has also been essential to discount 'cut outs', for example where a resubmission site omits an area that now has planning permission.
- 4.21 There are a small number of duplicate sites from 2017 or 2021 which have been discounted eg because the same site has been submitted separately by joint landowners, or by a landowner and an agent or a developer, or twice by the same person through the same call for sites.
- 4.22 The number and nature of site overlaps is potentially confusing, both for understanding the HELAA assessments, and how the counts of supply from potential capacity are used when producing the delivery trajectories. The discounted overlaps and residues of sites are recorded in the sites listed in Appendices in the HELAA report Part 1. Removing the overlaps is essential, when compiling the 'clean list' of sites (i.e. without duplicates, and without sites or parts of sites no longer identified as available). That list will be a starting point for the next stage in the work on the site selection process.

b) Stage A criteria - sites meeting and sites not meeting the criteria

- 4.23 Taking account of the 130 site resubmissions, results in 552 sites (net) that needed to be surveyed. The initial 'sieve' for Stage A (see *Appendix 1 – Section 4*) resulted in the identification of:
- 25 sites which did not pass the stage A assessment, and did not proceed to the Stage B assessment (these sites are recorded for completeness)
 - 527 sites which passed the stage A assessment, to proceed to the Stage B assessment, comprising
 - 83 Strategic Sites from the 2017 Submissions
 - 444 non-strategic sites from 2017 and sites from 2021 submission (net of the resubmissions)

Planning permission evidence resulted in identification of 12 of the 527 sites as now benefitting from planning permission for development. These sites were not assessed, but considered to be available, suitable and deliverable. Their supply counts will be counted as NIL for the trajectory if planning permission were granted by 31 March 2021. Otherwise the supply would count towards the HELAA sites "available, suitable and deliverable" supply category in the trajectory.

c) Site Assessments – sites available, sites suitable, sites achievable

- 4.24 At the core of the HELAA work and analysis are the detailed assessments of sites that pass Stage A. (See *Appendix 1 – Section 6*). The assessments focus on the three tests that are set out in PPG, of sites being:

- Available
- Suitable
- Achievable

4.25 The following analysis discounts site overlaps and excluding those parts of 2017 non - strategic sites that were not resubmitted in 2021, unless there is evidence that they continue to be available. This avoids double counting.

Available

4.26 The primary source of data to demonstrate that sites are available for development is provided by the submitters of sites, through their information submitted through the 2017 and 2021 Call for sites, or from follow up checks. In response to the question about availability set out in the HELAA form, their information states whether their sites are available for development. Evidence demonstrating landownership comes from Land Registry documents provided by the landowners/ developers with the HELAA submissions.

4.27 The detailed site assessment for each site shows whether a site is available. If a site is not available or no longer available then it is identified as such and is discounted from supply counts and trajectories.

4.28 Section 6 of Appendix 1 to this report provides further details about the ‘currency’ of the data on availability and the work undertaken to date to check on whether data on ‘availability’ is up to date and robust. 214 sites have been checked, but 145 non-strategic sites submitted in 2017 and not resubmitted are currently assumed to remain available but it would be prudent to check and confirm their availability before the HELAA report - Part 2 is produced and presented to Members

Summary Tables: Housing Capacity

4.29 Tables 1 to 12 summarise the potential housing capacity in identified sites. Further analysis will be provided with HELAA Report – Part 2 on employment land capacity, as well as any additional housing capacity identified from the 2022 Call for sites and other sources of supply. Overlaps of sites have been discounted, so the tables are ‘net’ capacity.

4.30 Table 1 shows the total number of confirmed available sites and these sites’ combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

Table 1	No of sites	No of Dwellings
Confirmed available sites		
Sites proposed for housing or on mixed use site which include housing	288	Approx. 35,973

4.31 Table 2 shows the combined number of confirmed available sites and 2017 sites not reconfirmed as available, and sites’ combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 2	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*		
Sites proposed for housing or on mixed use site which include housing	420	Approx. 40,134

* Excludes 2017 sites now confirmed as not available

4.32 Submissions also provided information about the timing of when sites would be delivered, based on the following time periods set out in PPG, and this information is included in the detailed site assessments in the HELAA report – Part 1:

- Within the next 5 years
- Within a 6 to 10 year time period
- After 10 years

4.33 Further assessment of the timing of the sites’ delivery will be undertaken in the HELAA report – Part 2, and includes the views of the Panel regarding delivery timeframes.

Suitable

4.34 The Council is responsible for gathering and analysing the evidence to assess whether submitted sites are suitable for potential development for HELAA purposes. Members will be aware that further work on site selection is currently in progress which will consider the suitability of sites in more detail (see the separate report to this committee on this matter).

4.35 The HELAA Report – Part 1 analysis of suitable sites uses information from two sources:

- a) The information collected and assessed for the GESP HELAA report 2019 for the 83 strategic sites. The summary information used in the detailed site assessments is set out in Appendix F of that report.
- b) The EDDC database of constraints, services and facilities, plus comments received eg from Devon County Council relating to Minerals and Highways/access. This information was used to assess the non-strategic sites from 2017, and the sites submitted in 2021.

4.36 The use of databases has assisted in this process of assessing suitability. Nevertheless, the volume of sites has required significant work to reach conclusions about the following matters which were used to determine whether or not a site has passed ‘Stage B’ of the detailed assessment of the suitability of submitted sites for housing and for employment (*details of the relevant thresholds are shown in Section 6 of Appendix 1 to this report to Committee*):

4.37 Failure on any one of the 5 suitability tests (i.e. where the answer to the question in a test is YES) results in the site not passing the overall suitability test and not passing Stage B of the suitability assessment.

4.38 Table 3 shows the total number of confirmed available sites, that are assessed as suitable and these sites’ combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 3	No of sites	No of Dwellings
Confirmed available sites that are suitable for housing		
Sites proposed for housing or on mixed use site which include housing	292	Approx. 34,965

4.39 Table 4 shows the combined number of confirmed available sites and 2017 sites not reconfirmed as available, that are assessed as suitable and sites’ combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 4	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*, that are suitable for housing		
Sites proposed for housing or on mixed use site which include housing	393	Approx. 39,052

4.40 Of the 420 available sites in East Devon, 393 (94% of sites) have been therefore been assessed as suitable for HELAA purposes i.e. passed all 5 tests at Stage B comprising

1. Is the site an unacceptable distance from a reasonable range of services and facilities?
2. Will the site have an unacceptable impact on biodiversity?
3. Will the site have an unacceptable impact on heritage?
4. Will the site have an unacceptable impact on landscape? –
5. Will the site have an unacceptable impact on flooding/land/resources?

4.41 The other 107 sites that remain available, either did not pass the Stage A test for suitability, or were not put forward for housing, or were wholly overlapped by sites that are being counted, or were in locations that were not consistent for passing the strategic housing location test applied to the 2017 site submissions. Assessments of sites put forward for employment led development will be in the HELAA Part 2 analysis.

4.42 Members will be aware that the HELAA is a starting point for the work to identify and select sites for allocation in the emerging Local Plan. Initial data has already informed plan preparation work, through information about site boundaries and some understanding about land put forward for consideration by owners and developers. Initial policy related site assessment work undertaken by officers has informed possible land allocations that have been identified in the local plan paperwork that has been considered by Strategic Planning Committee over recent weeks. Future evidence, for example on flood risk, water capacity, infrastructure, the sustainability appraisal, and plan viability, will need to be taken into account when assessing and selecting sites for allocation. The selection process and analysis will be recorded in forthcoming evidence documents, separate from the HELAA.

Achievable

4.43 Section 7 of Appendix 1 of this report to committee explains the role of the HELAA Panel in considering the potential for sites' development to be achievable. The focus is on identifying potential 'show-stoppers' or factors that could reduce the site area or yield.

4.44 The 2017 HELAA Panel's conclusions about the achievability of the 83 strategic sites identified in East Devon are set out in the detailed site assessments, which are reproduced in Appendix 2 to this report (and available online at [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk))

4.45 The 2021 HELAA Panel's conclusions about achievability are recorded in the 2021 site assessments in an Appendix set out in the HELAA report - Part 1 appended. For the purposes of Table 5 -12, 'achievable' means that the site is probably achievable or probably achievable if mitigation or measures are carried out enabling the site to be delivered. 'Unachievable' means that a site was assessed as probably not achievable or probably not achievable unless significant measures could be secured but which are not likely to be forthcoming.

4.46 Table 5 shows the total number of confirmed available sites, that are assessed as achievable and these sites' combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 5	No of sites	No of Dwellings
Confirmed available sites that are achievable		
Sites proposed for housing or on mixed use site which include housing	265	Approx. 27,706

4.47 Table 6 shows the combined number of confirmed available sites and 2017 sites not reconfirmed as available, that are assessed as achievable and sites' combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 6	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*, that are achievable		
Sites proposed for housing or on mixed use site which include housing	353	Approx. 31,540

4.48 Of the 420 available sites in East Devon, 353 (84% of sites) have been assessed as achievable for HELAA purposes.

d) Meeting all Stage B Suitability criteria and Achievable

4.49 The following analysis discounts site overlaps and excluding those parts of 2017 non - strategic sites that were not resubmitted in 2021, unless there is evidence that they continue to be available. This avoids double counting.

4.50 An assessed site that meets all the criteria for being available and suitable passes Stage B. Sites which pass stage B and are achievable will go forward to be included in the housing and employment trajectories to be set out in the HELAA report – Part 2.

4.51 Table 7 shows the total number of confirmed available sites in East Devon (including sites in the Cranbrook Plan area) that are also assessed as suitable and achievable and these sites' combined capacity for dwellings (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

Table 7	No of sites	No of Dwellings
Confirmed available sites , that are suitable and achievable		
Sites proposed for housing or on mixed use site which include housing	251	Approx. 27,267

4.52 Table 8 shows the combined number of confirmed available sites and 2017 sites not reconfirmed as available in East Devon that are assessed as suitable and achievable and sites' combined capacity for dwellings(discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 8	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*, that are suitable and achievable		
Sites proposed for housing or on mixed use site which include housing	339	Approx. 31,047

e) Sites not meeting all Stage B criteria (i.e. not suitable) or not achievable

- 4.53 The following analysis discounts site overlaps and excluding those parts of 2017 non - strategic sites that were not resubmitted in 2021, unless there is evidence that they continue to be available. This avoids double counting.
- 4.54 An assessed site that does not meet all the criteria for being available, suitable and achievable does not pass Stage B. These sites do not go forward to be included in the housing and employment trajectories to be set out in the HELAA report – Part 2.
- 4.55 Table 9 shows the total number of confirmed available sites in East Devon that have not been assessed as not suitable or not achievable, or both and these sites' combined capacity for dwellings and employment land. (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

Table 9	No of sites	No of Dwellings
Confirmed available sites that are not suitable or not achievable		
Sites proposed for housing or on mixed use site which include housing	37	Approx. 8,712

- 4.56 Table 10 shows the combined number of confirmed available sites and 2017 sites not confirmed as available in East Devon, that have not been assessed as suitable and achievable and sites' combined capacity for dwellings and employment land. (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

Table 10	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*, that are not suitable or are not achievable		
Sites proposed for housing or on mixed use site which include housing	81	Approx. 9,087

- 4.57 About 9,100 dwellings (approximately 22% of the net potential housing capacity on sites identified from the 2017 and 2021 call for sites) have been assessed as not suitable or not achievable for the purposes of the HELAA, at this time.
- 4.58 Members are advised that some of these sites might still be considered as potential sites for consideration in the site selection process in the future if there is new evidence to demonstrate how they can pass the Stage B test or that they can be achievable.

f) Net housing supply from sites meeting Stage B – including and excluding sites in the Cranbrook Plan area

- 4.59 The following analysis discounts site overlaps and excluding those parts of 2017 non - strategic sites that were not resubmitted in 2021, unless there is evidence that they continue to be available. This avoids double counting.
- 4.60 An assessed site that meets all the criteria for being available, suitable and achievable passes Stage B. It is these sites that will go forward to be included in the housing and employment trajectories to be set out in the HELAA report – Part 2.
- 4.61 Tables 11 and 12 are a breakdown of Table 8 (Potential capacity of sites that are available, suitable and achievable for housing) to identify capacity on sites identified from the 2017 and 2021 call for sites inside and outside the Cranbrook Plan area.

4.62 There were additional sites put forward in the Cranbrook plan area, but these are within the Expansion Areas, and so are not included in Table 11, in order to avoid double counting supply in the trajectories that will be produced in the HELAA report – Part 2. Those sites are not assessed for suitability or achievability. For completeness, they are listed and identified in an Appendix in HELAA report part 1.

4.63 Table 11 shows the total number of confirmed available sites in the Cranbrook Plan area (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook) that are also assessed as suitable and achievable and these sites' combined capacity for dwellings and employment land.

Table 11 Within the Cranbrook Plan area	No of sites	No of Dwellings
Confirmed available sites that are suitable and achievable		
Sites proposed for housing or on mixed use site which include housing	3	157

4.64 Table 12 shows the combined number of confirmed available sites and 2017 sites not confirmed as available in East Devon excluding sites in the Cranbrook Plan area) that are assessed as suitable and achievable and sites' combined capacity for dwellings and employment land (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook).

Table 12 Outside the Cranbrook Plan area	No of sites	No of Dwellings
Confirmed available sites plus 2017 sites not re-confirmed as available*, that are suitable and achievable		
Sites proposed for housing or on mixed use site which include housing	336	Approx. 30,890

4.65 The amount of potentially developable housing and employment land identified as 'available, suitable and achievable' in Tables 11 and 12 reflect estimated 'capacity' at this time. This does not imply that all of the land will be allocated.

By parish

4.66 Based on the sites counted in Table 8, Table 13 shows information by Parish about the combined number of confirmed available sites and 2017 sites not confirmed as available in East Devon, that have been assessed as suitable and achievable and sites' combined capacity for dwellings and employment land. (discounting any capacity that had planning permission as at 31 March 2021 or were in Local Plan allocations including Cranbrook)

TABLE 13 – Net capacity of suitable/available/achievable sites from 2017 and 2021 Call for sites housing and employment (*based on Table 8*).

Table 13		
Parish	HOUSING	
	No of sites	Net dwellings capacity
Awliscombe	4	107
Axminster	15	1560
Axmouth	6	38
Aylesbeare	9	133
Branscombe	2	27

Broadclyst	8	640
Broadhembury	5	49
Budleigh Salterton	5	330
Chardstock	4	120
Clyst Honiton	10	9968
Clyst Hydon	2	25
Clyst St George	18	1172
Clyst St Mary	3	114
Colaton Raleigh	1	7
Colyton	9	490
Cranbrook	2	151
Dalwood	1	6
Dunkeswell	2	239
East Budleigh	1	18
Exmouth	11	970
Farringdon	6	4281
Feniton	8	485
Gittisham	2	464
Hawkchurch	3	54
Honiton	12	381
Kilmington	11	190
Lympstone	10	656
Membury	2	18
Musbury	5	64
Newton Poppleford	7	194
Offwell	2	32
Otterton	3	41
Ottery St Mary	23	1870
Payhembury	2	27
Plymtree	3	180
Poltimore	3	232
Rockbeare	14	723
Seaton	9	358
Sidmouth	14	688
Sowton	9	707
Stockland	5	54
Stoke Canon	1	12
Talaton	5	111
Uplyme	2	92
Upottery	1	20
West Hill	13	484
Whimple	14	852
Widworthy	1	28
Woodbury	31	1585
DISTRICT TOTAL	339	31,047

Notes:

Some identified sites straddle parish boundaries:

- The capacity in the parish of Clyst Honiton in Table 13 includes sites where the main part of the site is in Clyst Honiton, but smaller parts are in Aylesbeare, Farringdon and Sowton (to avoid double counting those parts of sites have not been counted in the relevant parish in Table 13)
- The capacity in the parish of Farringdon in Table 13 includes a site where the main part of the site is in Clyst Honiton, but smaller parts are in Woodbury and Clyst St Mary (to avoid double counting those parts of sites have not been counted in the relevant parish in Table 13).

5 Implications and risk management (See section 11)

a) Implications

- 5.1 The potential housing capacity (net yields) in Table 12 is 31,047 dwellings from sites identified from the 2017 and 2021 call for sites that are 'available, suitable and achievable' (excluding overlaps and excluding planning permission by 31 March 2021 and allocations).
- 5.2 These figures include mixed use sites, where the provision of employment would reduce the amount of land available for housing.
- 5.3 Furthermore, more detailed assessment of suitability, and the application of the spatial strategy and strategic priorities could reduce the capacity further. Further work for the site selection process will consider constraints in more detail. It will be necessary to avoid or, if appropriate, to mitigate the potential impact of constraints. This will reduce the net developable area and the amount of housing.
- 5.4 Some sites could not deliver their capacity by 2040. The potential for a new settlement may only be delivered in part in the plan period 2020 to 2040, with the remainder delivered post-2040. In addition, some of the largest sites proposed by site submitters as new communities are situated in relatively close proximity to each other. Whether the market is able to support the development of more than one new settlement in such close proximity by 2040 is doubtful. This would further constrain delivery from potential net housing capacity.
- 5.5 Some sites have been assessed as probably or potentially unachievable, unless there is evidence that they could come forward together with other sites. They could add to supply
- 5.6 In addition, decisions will need to be made on whether to commission further evidence gathering, which could result in reducing developable site areas or preclude development on some sites. For example, to provide evidence and information about the following:
 - Mineral Resource Assessments for sites that are within Mineral Consultation Areas or Mineral Safeguarding Areas where the Mineral Planning Authority has indicated that an MRA should be undertaken to assess if there is commercially viable mineral
 - Site specific Level 2 Strategic Flood Risk Assessments for sites where part of the site is within Flood Zone 3, or on sites of more than 1.0 hectare in Flood Zone 1 that are in a Critical Drainage Area
 - Detailed Heritage Impact Assessments – to ascertain the impacts of site development on the significance of heritage assets within and outwith the site
 - Assessments off the implications of nutrients neutrality regarding the River Axe SSSI catchment
 - Assessments of air quality and noise impacts of development of sites and the impact of adjoining uses on sites being considered for development.

b) Risk Management

- 5.7 **Consistent methodology:** The use of an endorsed methodology that is shared by the LPAs in the Greater Exeter Functional Economic Market Area and Housing Market Area, based on the latest PPG significantly reduces the risk of successful challenge to the HELAA evidence.
- 5.8 **Avoiding double counting and missing sites:** Considerable effort has been made in the recording and assessment of sites, and in addressing the challenges that have resulted from two call for sites. In particular, careful and consistent identification and recording of site overlaps within and between the two call for sites. It will be necessary to undertake a similar exercise when the current 2022 call for sites data is used in the 2022 HELAA report – Part 2. Likewise, the issue of whether to count new sites within the Cranbrook Plan area has been considered, pending the decision on this matter in the Local Development Scheme.
- 5.9 **Available sites:** The results in the 2022 HELAA report – Part 1 combine data from two call for sites. The passage of time since the first call for sites meant there was a risk that some 2017 submitted sites are no longer available. This risk has been managed by:
1. Inviting owners/developers to resubmit sites in 2021, confirming availability
 2. Contacting submitters of the 2017 strategic sites to confirm availability
- 5.10 Ideally, the Council would contact the owners/developers of 2017 non-strategic sites to check availability. It will be prudent for this work will be undertaken and an update reported to this committee as part of the HELAA- Part 2 report. The summary results would need to be updated in light of that evidence.
- 5.11 **Suitable sites:** Applying the endorsed HELAA methodology supports the production of robust assessments, informed by available information on constraints, services and facilities. Planning judgement is required for part of the analysis, and may be challenged. There will be an opportunity to consider any queries about the HELAA Report – Part 1 analysis before the Part 2 analysis is completed, and amendments considered where there is robust evidence to support amendments.
- 5.12 **Achievable sites:** This is an area where the risks have been managed by the HELAA Panels' considerations of sites. This does rely on opinion, including additional views from the Local Highway Authority and Highways England. This is still the most appropriate evidence, in the absence of a full viability assessment of each site, which is not a practical solution and is not required by PPG.
- 5.13 **Potential yield/site capacity:** The Methodology has been applied to calculate the potential yield of sites. This avoids over-estimating capacity This includes
- excluding sites in Flood Zone 3, taking account of land under power lines or over strategic gas pipeline easements, steep slopes
 - discount the relevant percentage of the remaining area of the site to allow eg for open space, SUDs, other uses
 - applying the relevant housing density – the potential capacity assessment used in Tables 1 to 12 drew on evidence from
 - the 2017 HELAA assessments which gave a low/mid/high range (the mid figure is used in the Tables)
 - calculated yields from 2021 based on the HELAA methodology, moderated by promoters' assessment of potential capacity which take account of some factors such as topography, local densities and individual site characteristics. The lower of the 2 sources for each site is used in Tables 1 to 12 (and in the site assessment profiles - unless there has been a planning permission)

5.14 **Gypsies and traveller sites** – There has been a long standing challenge of identifying sites for accommodating gypsies and travellers. Very few past submissions have promoted land for this sector of our community. One of the sites put forward in 2017 has been withdrawn. The current 2022 Call for sites is an opportunity to encourage such submissions.

6 Next steps

- 6.1 The next step is to complete the work for HELAA part 2. This includes the initial survey, the detailed site assessments and the assessment of potential yield for new sites identified from the 2022 Call for sites, as well as Employment sites from 2017 and 2021. Assessed site capacity from all calls for sites and from other data sources will be combined into tables for the trajectories for housing sites delivery and employment sites delivery in Appendices in the HELAA report – Part 2.
- 6.2 For the avoidance of doubt, the HELAA report will need to emphasise in the strongest terms that identification of land with potential for housing or employment development by the HELAA does not imply that the Council will grant planning permission for development on that land or allocate land for development through the Local Plan.
- 6.3 It is the HELAA's role to provide information on the range of sites that are available to meet need, in order to inform plan making but the HELAA itself does not determine that a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development. It is for the development plan to determine which of those sites are the most suitable to meet the needs of East Devon. Early work was undertaken to consider potential sites for plan making purposes, for the working draft of the plan which Members last considered at their 22 February 2022 meeting. Evidence to support site selection is 'work-in-progress'. In a separate report to this Committee, Members views are being sought on the approach to the site selection process.
- 6.4 We will be notifying people who submitted sites through the Call for sites of the availability of the Assessments, in due course.

Financial Implications

There are no additional financial implications being identified in the report.

Legal Implications

There are no legal implications from this information report for noting.