

EAST DEVON

2022 Housing and Economic Land Availability Assessment (HELAA) – Part 1

May 2022

(DRAFT)

2022 East Devon Housing and Economic Land Availability Assessment – Part 1

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1.0 Introduction

- 1.1 East Devon 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 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.
- 1.3 This 2022 East Devon HELAA report – Part 1 is the first of two stages in the preparation of the latest Housing and Economic Land Availability Assessment for the district of East Devon.

2.0 What is a Housing and Economic Land Availability Assessment?

- 2.1 A Housing and Economic Land Availability Assessment (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 National Planning Policy Framework (NPPF). In summary, a HELAA should:
- Identify sites and 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).
- 2.2 As a technical evidence document, the HELAA report must be robust, thorough and proportionate for the purposes of plan-making, if the policies which rely on it for evidence are to be found sound.
- 2.3 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that figures may change, and indeed have changed throughout the process as new sites have been put forward or been withdrawn, or judgements changed. Results of a HELAA published in a HELAA report are therefore a snapshot in time.
- 2.4 A HELAA can be updated, for example with further call for sites. If there is robust evidence of a factual error in an assessment, then a correction can be published. If there is evidence of a change in circumstances, this can inform a subsequent HELAA report, or HELAA addendum.
- 2.5 The HELAA report is technical evidence. It is a key part of the evidence base needed to underpin and 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.
- 2.6 The HELAA informs plan making but does not in itself 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 the role of the HELAA to provide information on the range of sites that are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.

3.0 Producing the HELAA report in stages

3.1 The 2017 and 2021 call for sites resulted in 682 submissions of sites in East Devon, including resubmitted sites and overlaps. Even when the resubmissions are taken into account, there were 552 sites (net) which is a significantly high number to process and analyse. Production of the HELAA report's outputs is complex as

- Assessments are detailed, consistent with current Planning Practice on HELAAs
- 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
- Many 'resubmitted' sites had amended boundaries or amended development proposals
- There will also be other sites to assess, including those that will come through the current call for sites
- 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.

3.2 The HELAA is therefore progressing in stages. This as a pragmatic way to manage the magnitude and the complexity of the work, and because of the need for transparency. This also enables the reporting on the second East Devon Call for sites and other sites to be accommodated. The three stages are as follows:

1. The East Devon HELAA Report – Part 1

3.3 Work has progressed on the analysis of sites which were received as the result of the 2017 and 2021 Call for sites inviting sites to be submitted by site promoters. This work has reached the stage where detailed assessments relating to the 2017 and 2021 Call for sites can be set out in this draft interim 2022 East Devon HELAA – Part 1 report. The report is an opportunity to present HELAA output for East Devon as early as possible.

3.4 This Part 1 report focuses on the assessment of potential housing sites in the District, including mixed use sites including housing, identified from sites put forward through the 'Call for sites' processes which invited site submissions in 2017 and 2021. The Part 1 report contains information that will become part of the combined HELAA report. It is technical evidence which :

- Explains the process of assessing site availability, suitability and achievability, and calculates delivery rates, assessing the delivery of sites for development against need for housing development and for economic development
- Sets out the latest agreed HELAA methodology (*See Appendix A*)
- Sets out the latest agreed HELAA Panel's Constitution and Terms of Reference (*See Appendix B*) and identifies the Panel (*See Appendix C*)

- Includes maps showing where the sites are (See Appendices D(i) and D(ii))
- Provides a list identifying each site in East Devon submitted through two calls for sites (2017 and 2021) which have been assessed, and identifying overlaps (See Appendices E(i) and E (ii))
- Provides detailed output through the individual assessments of sites in East Devon submitted through the 2017 and 2021 calls for sites (See the Site assessment profiles in Appendices F(i) and F(ii))
- Sets out interim summary results about the amount of potential housing capacity in East Devon identified as available, suitable and achievable (drawn from the assessments of sites submitted through the 2017 and 2021 Call for sites).
- Part 1 also identifies matters where there is still 'work in progress'. The intention is for the outcome of that work to be presented in a forthcoming 2022 HELAA Part 2 report.

3.5 The East Devon HELAA report - 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.

2. The East Devon HELAA Report – Part 2

3.6 The 2022 HELAA Part 2 report will report on the outcomes of HELAA work on:

- The identification, survey and assessment of :
 - Other sources of sites; and
 - The 2nd East Devon Call for sites which commenced in March 2022, and is for a six week period
- Listings of those additional sites, maps showing their location, and the related detailed site assessment profiles,
- Housing and economic trajectories – forecasting the delivery of available, suitable and achievable sites identified through the HELAA reports – Parts 1 and 2, taking into account any site overlaps to avoid double counting.

3. The combined 2022 East Devon HELAA Report

3.7 When the Part 2 work is complete, the results will be combined with the information from Part 1 to produce a final 2022 East Devon HELAA report. The combined HELAA report will need to be accepted and signed off by the Council as evidence before it is then published as part of the Local Plan evidence base.

4. HELAA Methodology

3.8 Planning Practice Guidance Housing and Economic Land Availability Assessment (22 July 2019) is a very important factor influencing the approach used by the Council to identify and assess potential sites and potential capacity, and to forecast delivery. Following the guidance in PPG will inevitably result in the combined

HELAA report being a lengthy and detailed document, given the number of sites already identified, and potentially more to assess. There will however be an executive summary.

- 3.9 PPG paragraph 4 indicates what inputs and processes can lead to a robust assessment of land availability. PPG makes clear that the assessment needs to be thorough and proportionate. It expects that the LPA, as a plan-making authority, will have regard to the guidance in preparing and updating its assessments. The Council will need to explain any departure from this guidance in the plan-making evidence.
- 3.10 The 2022 East Devon HELAA (Parts 1 and 2 combined) report will be the latest in a series of HELAA reports covering the district, produced since 2008. It continues the history of working collaboratively to an agreed methodology with the other authorities in the Exeter Housing Market Area, as outlined in the report to the 15 December 2020 Committee¹.
- 3.11 The 2022 East Devon HELAA work draws on evidence from the HELAA call for sites undertaken in 2017 and the related analysis. It makes use of information already available. The 2017 Call for sites data was used in the collaboratively prepared HELAA undertaken as part of work on the Greater Exeter Strategic Plan (GESP). That HELAA work used a joint methodology agreed by Committee on 21 November 2016. The subsequent 2017 HELAA report (including the 83 strategic sites assessments for sites in East Devon) was published as evidence in 2019².
- 3.12 For the purposes of the GESP HELAA, strategic sites were 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 authorities³ 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.
- 3.13 The GESP HELAA was prepared in accordance with the Greater Exeter HELAA Methodology (Revised April 2017) (HELAA Methodology), unless otherwise justified in the HELAA report 2019 or its appendices. The HELAA Methodology reflected Government planning practice guidance at April 2017 on how to undertake HELAA.
- 3.14 The four authorities in the Housing Market Area subsequently amended the joint methodology in 2021, to reflect the latest requirements set out in the 2021 NPPF

¹ [5. LocalPlanEngagementReport.pdf \(eastdevon.gov.uk\)](#)

² <https://www.gesp.org.uk/evidence/>

³ East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, working in partnership with Devon County Council.

and Planning Practice Guidance, including the updated PPG on Housing and Economic Land Availability Assessment published on 22nd July 2019⁴.

- 3.15 Following the Council decision in December 2020 to withdraw from the GESP East Devon District Council is now producing a new East Devon Local Plan. The East Devon Call for site started in January 2021. At their meeting on 22 June 2021, the East Devon Strategic Planning Committee resolved:
- That the proposed next steps and amendments to the HELAA methodology detailed in the report be agreed.
 - 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.
- 3.16 Details of the latest methodology are set out in Appendix A to this East Devon HELAA report- Part 1.

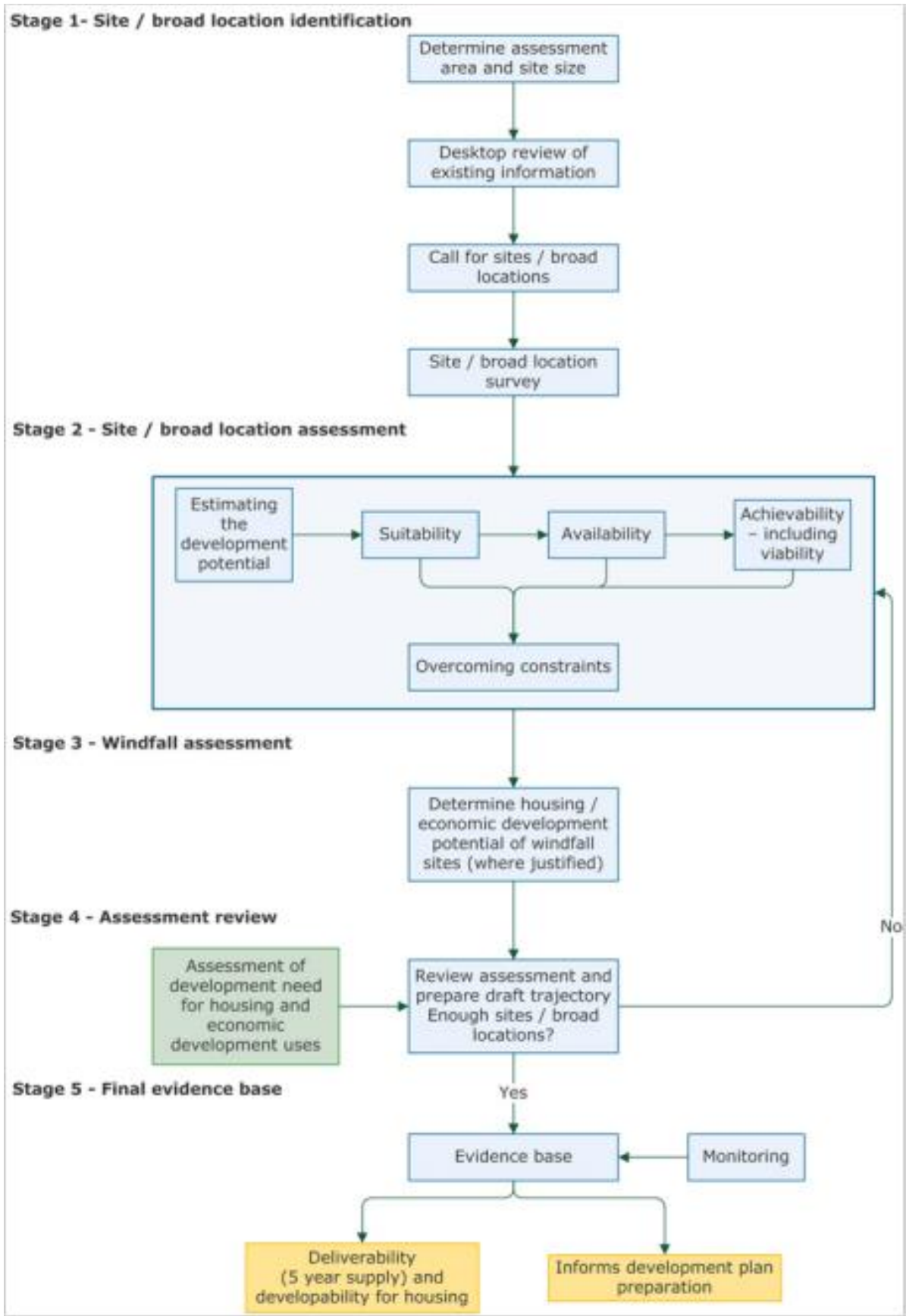
⁴ Available on the Government's website at [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/812222/housing-and-economic-land-availability-assessment-2019.pdf)

4.0 STAGE 1 - Site / broad location identification

- 4.1 The Planning Practice Guidance on HELAA provides a flow chart which details the inputs and process which should be included to such a robust assessment. The East Devon HELAA broadly reflects the flow chart approach.
- 4.2 To expedite the gathering of information about sites, mindful of the need to be proactive, the Council undertook the 2021 Call for sites to strengthen the potential to identify sites to be considered through the HELAA process. The second and third steps in the first stage are still a work in progress, to be reported in the East Devon HELAA report – Part 2. Likewise, the work on delivery trajectories, and windfalls will be reported in Part 2.
- 4.3 Diagram 1 below reproduces the flow chart.

Diagram 1

PPG Housing and Economic Availability Assessment: Methodology Flow chart



- 4.4 The HELAA analysis is a snapshot. Further work on the Local Plan will be undertaken to consider selection of sites and viability assessment. There will be further information from the Housing Monitoring Update in 2022 and in subsequent years. Additional evidence on site whether sites are deliverable or developable will also inform future sites assessment. Information will be updated as the new Local Plan progresses towards submission. The timing of emerging evidence does not always coincide with HELAA revisions or addendums.
- 4.5 The stages and steps to which this HELAA report Part 1 relates are as follows:

1. STAGE 1 - Determine assessment area and site size

- 4.6 The first step in HELAA -Stage 1 (Site/Broad location identification), as set out in PPG, is to determine site size and the assessment area. This is the step which is referred to as Stage A in the endorsed HELAA methodology. Both site size and assessment area directly impact on the amount of land identified to be assessed for potential development.

a) Site size threshold

- 4.7 The site size threshold is used in Stage A of the HELAA assessment. The agreed HELAA methodology confirms the minimum site size threshold for sites if they are to pass Stage A of the assessment process and go on to be assessed for availability suitability, and achievability in Stage B, as:
- 5 dwellings (gross) or 0.15 hectares for housing sites
 - 500m² floorspace or 0.25 hectares for employment led sites.
- 4.8 Sites below the threshold do not progress to Stage B of the HELAA analysis (as set out in the HELAA methodology) and are therefore discounted. They are however recorded in the list of HELAA sites identified to ensure that all identified sites are accounted for.

b) Area for assessment

- 4.9 PPG HELAA (22 July 2019) Paragraph 6 makes clear that the area selected for the assessment should cover the plan-making area.
- 4.10 To date, the geographical area covered by the current East Devon HELAA is all the land within the council's administrative boundary. As the Local Planning Authority, the Council is responsible for the production of both the emerging East Devon Local Plan and the Cranbrook Plan. The current title of the former implies that it covers all of the East Devon district. The latter relates only to the plan area of Cranbrook. The Cranbrook Plan, is a Development Plan Document (DPD) and is at a very advanced stage of plan-making, where the Main Modifications consultation closed on 28 February 2022.

Sites inside and outside the Cranbrook Plan area

- 4.11 Including or excluding identified HELAA sites within the Cranbrook plan area will impact on the HELAA potential supply assessments and trajectories for housing and employment.
- 4.12 The HELAA work has raised the need to clarify the plan-making area for the East Devon Local Plan. In particular, the inclusion or otherwise of land within the emerging Cranbrook Plan area remains to be clarified through the Local Development Scheme. The working draft East Devon Local Plan does not propose superseding the emerging Cranbrook DPD policies. Neither does it incorporate Cranbrook Plan policies within the Local Plan, nor does it currently suggest making additional Local Plan site allocations within the plan area of the Cranbrook Plan.
- 4.13 The issues of the plan making area, spatial strategy and policy coverage will be matters for the Council to determine.
- 4.14 Until then, it remains necessary for the 2022 HELAA report (Parts 1 and 2) to assess sites that have been identified within East Devon including those from:
- The 2017 Call for sites which occurred as part of the previous GESP work, but provides evidence about potential sites. It predates the decision to produce a new East Devon Local Plan. Some submitted sites lie within the Cranbrook Plan area;
 - The 2021 Call for Sites which did not expressly preclude sites within the Cranbrook Plan area from being submitted. Some submitted sites lie within the Cranbrook Plan area; and
 - Sites identified from other sources, which may include sites within the Cranbrook Plan area.
- 4.15 To avoid prejudicing any future Local Development Scheme decision by the Council about the plan-making area, particularly regarding site allocations in the emerging East Devon Local Plan, it would be necessary for the 2022 HELAA report (Parts 1 and 2) to:
- Assess identified sites which lie within the Cranbrook Plan DPD area; and
 - Provide separate counts of supply from identified HELAA sites and other sources for:
 - All of East Devon District; and
 - That part of East Devon District outside the Cranbrook Plan DPD area (i.e. excluding sites wholly within or any area of a site partly within the Cranbrook Plan DPD area).

2. STAGE 1 - Desktop review of existing information

- 4.16 The HELAA is investigating a wide range of potential sites, not just the sites put forward by landowners and developers through the Call for Sites undertaken in 2017 and 2021.

- 4.17 A wide variety of sources will be used to identify potential sites. A list of potential sources is set out in the PPG. However, one of the principal methods for identifying such sites will be a public consultation exercise undertaken by the partner authorities. This may be undertaken jointly with one or more of the partner authorities, or individually. The 'call for sites' is targeted at landowners, agents, developers and town and parish councils to identify sites that are not currently within the planning process. Potential infrastructure requirements and a consideration of viability and deliverability of the submission site must be clearly demonstrated through the call for sites process. Other known sites will be included, such as existing allocations, current/lapsed planning permissions, draft allocations. The HELAA Reports Parts 1 and 2 make clear which sites were identified from which sources.
- 4.18 To provide a complete audit of available land, the East Devon HELAA should aim to identify all sites and broad locations regardless of the amount of development needed. This is consistent with PPG paragraph 8. A robust HELAA assessment can then provide information as part of the process enabling the LPA to identify sites and locations that are most suitable for the level of development required.
- 4.19 It is the LPA's role and responsibility to carry out the processes to identify potential sites which will be assessed by the HELAA. In doing so the Council should also be mindful of NPPF 2021, which expresses the Government's objective towards significantly boosting housing supply, and of paragraph 68 which states:
- Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*
- 4.20 The work of the HELAA requires considerable effort to identify potential sites that can then be assessed using the HELAA methodology. The sources of potential sites and the degree to which the LPA is proactive in investigating those sources directly impact on the number and range of sites that are identified, and the scale of potential supply.
- 4.21 Site identification and assessment needs to be robust, based on the endorsed methodology, consistent with PPG and NPPF.
- 4.22 The next steps in Stage 1 of the HELAA process identify sites and broad locations in East Devon as indicated in the flowchart in PPG (reproduced in HELAA Report Part 1), from the following sources:
- Desktop review of existing information
 - Call for sites/broad locations (see details in section 5 of this Appendix)
 - Site/broad location survey.
- 4.23 Through carrying out the desktop review, the LPA can demonstrate how it has been proactive in identifying as wide a range of sites and broad locations for development

as possible. This includes those existing sites that could be improved, intensified or changed.

4.24 The Government's PPG provides a list of the types of site sources that may be particularly relevant (*reproduced in Appendix G.*) Some of the data for East Devon is available, and other data is being gathered, as follows:

a) East Devon - data available

4.25 The LPA has information at the 2021 Monitoring Point, the latest data available, regarding

- Site allocations in existing Local Plan and Neighbourhood Plan (plans adopted or made as at the 2021 Monitoring Point), and
- Housing planning permissions that were unimplemented or under construction in East Devon. These are considered to be suitable, available and achievable, and will be counted in the HELAA trajectories unless there is clear evidence to the contrary.

4.26 Work is well advanced to provide information on employment (Use classes E(g), B2 and B8) with planning permissions that were unimplemented or under construction in East Devon. This will be included in the employment trajectory in Part 2.

b) East Devon - data being gathered/analysed

4.27 Work is progressing on other potential sources, and will be set out in the HELAA report - Part 2. This could add to the potential supply identified.

4.28 One useful source of information is the 2021 Urban Capacity Study (UCS) - Summary of Findings report. That study considered sites within the built up area boundaries of the seven towns in East Devon. At their meeting on 30 March 2021, the Strategic Planning Committee noted the report and endorsed its use as evidence to support production of the new Local Plan with a caveat that higher densities in towns are to be explored. Sources of supply in that assessment included source types listed in PPG including sites that meet size thresholds on the following site types:

- Planning approval not completed
- DPD site allocations not completed
- Brownfield Land Register
- Withdrawn, refused, live planning applications
- Council identified opportunities: Council assets
- Institutional assets and opportunities
- Targeted national non domestic ratings – identified sites
- Vacant residential properties
- Additional potential UCS sites (from the 'left-over space' assessment

4.29 Work is in progress to identify which of these UCS sites are not already identified from the HELAA Call for sites or had planning permission by the 2021 Monitoring

Point. Further work is needed to assess their availability and achievability, and the results included in the HELAA Part 2 report.

- 4.30 Further work will also be needed to find out if there are other sites of these types that can be identified within or adjoining proposed settlement boundaries of other settlements identified in the emerging Settlement Hierarchy, and consistent with the emerging spatial strategy, that have not already been identified by the HELAA process to date.
- 4.31 Rather than simply relying on the current information as being correct and up to date, the council will seek to check data accuracy with agents/landowners/ developers and other interested parties, to confirm that sites remain available and achievable and if the site is correctly identified as deliverable or developable.
- 4.32 Work will then be undertaken to assess those sites' availability and achievability. The outcome of work the desktop review will be reported in the East Devon HELAA Report - Part 2.

3. STAGE 1 - Call for sites/broad locations

- 4.33 In line with PPG, it is important for the LPA to issue a call for sites and broad locations for development if the process to identify land is to be transparent and identify as many potential opportunities as possible. It provides an opportunity for anyone to identify and inform the Council about any land areas that they consider could be appropriate for future development. There can be one or more call for sites on which the HELAA draws.
- 4.34 A Call for Sites enables sites to be identified for assessment in a HELAA that might not otherwise be picked up through a desk-top review by the local planning authority. Sites can be submitted for assessment by any person or organisation and are typically promoted by land owners, developers, agents and local businesses. As part of the Call, the promoter is generally required to confirm that a site is available for development now or at some point in the future, thereby passing the HELAA's test of 'availability'.
- 4.35 To expedite the HELAA process, the Council is making use of the Greater Exeter Strategic Partnership (GESP) HELAA report (2019) which includes assessments of 83 'strategic sites' identified in East Devon. We have also drawn on information about other East Devon sites submitted in 2017, which have now been assessed. Nevertheless it was recognised at an early stage of East Devon LP plan making that it was necessary to undertake another Call for sites in 2021 to increase the amount of potential sites that could be identified. This work was prioritised ahead of the Desktop review of existing information. Consequently the East Devon HELAA report focuses on the sites identified from the 2017 and 2021 Call for sites.
- 4.36 This Part 1 report uses information about sites identified from the two call for sites and broad locations for development issued in 2017 and 2021. Sites that have been identified are shown on Maps in Appendices D(i) and D(ii), listed in Appendices E(i) and E(ii), and their assessments set out in Appendix F.

a) 2017 Call for Sites

- 4.37 A Call for Sites was undertaken by the GESP authorities from late February to early April 2017. The notification was undertaken by the GESP authorities, publicising the Call on the GESP website, the webpages of the GESP authorities and via press release.
- 4.38 Site promoters were able to submit their site information on line. The form available online for submitters to use set out the information sought from respondents, including information evidencing land ownership, and the site area.
- 4.39 The HELAA Methodology was endorsed by the Greater Exeter HELAA Panel, which comprised key stakeholders with an interest in the development of land for housing and economic uses. Further details about the Panel and its role in preparing the HELAA were provided in sections 4 and 6 of the HELAA Methodology and in the Panel Constitution and Terms of Reference (which are appendices in the 2017 HELAA report). A list of the organisations that sat on the GESP HELAA Panel and were involved in preparing the GESP HELAA is set out in Appendix C of the HELAA report published in 2019.⁵
- 4.40 Of the 359 site submissions in 2017 that were sites within East Devon:
- 83 sites were assessed as ‘strategic’ in the 2019 GESP-HELAA report. 65 of these were for housing or mixed use, including housing. The remainder were for employment uses. . The assessments were published on the GESP website. Generally, these sites have not been reassessed – and the HELAA relies on the assessments published in 2019.
 - 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, submitters of the other 39 sites were contacted to check whether they remain ‘available’. 31 sites were as remaining available; 4 sites were confirmed as no longer available (sites GH/ED/14, GH/ED/40, GH/ED/77, and GH/ED/78), and 4 sites did not respond.
 - 146 sites were not assessed in 2019 and have not been resubmitted. These have now been assessed – with the Site Assessment profiles set out within Appendix F. 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 4.45 below*)
- 4.41 Published collaboratively in 2019, the 2017 HELAA report only assessed ‘strategic sites’ put forward in 2017. Those assessments drew on the work undertaken by the four GESP authorities including East Devon District Council, with additional

⁵ [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

comments from Devon County Council and the Environment Agency, plus the HELAA Panel's assessment of the achievability of those sites.

b) 2021 Call for sites

- 4.42 In 2021 the previous call for sites was 4 years old. To ensure that the Council had an up to date picture of available sites across the District, at their December 2020 meeting, Committee authorised a new call for sites to be run alongside the “Issues and Options” consultation January to March 2021, resolving that:
- The timetable and process for future work on the Housing and Employment Land Availability Assessment be approved.
- 4.43 That ‘future work’ included another call for sites. The new ‘call for sites’ was open for submissions from 18 January to 15 March 2021, matching the consultation period for the Local Plan: issues and options stage. In January 2021, the Council notified previous submitters of the new 2021 Call for Sites and invited them to resubmit their sites for consideration. The form and questions available on the website are reproduced in Appendix H of this Part 1 report. Aimed at a wide audience, the notification was undertaken by the District Council, publicising the Call on the Council’s website, and via press release. That call for sites provided an opportunity for anyone to identify and inform the Council about any land areas that they consider could be appropriate for future development.
- 4.44 The data gathered via an online form made available throughout the consultation period utilised IT infrastructure in place, administered by Devon County Council. Some sites put forward were resubmissions. Others were new sites. The new sites in East Devon needed to be assessed so that they could inform current plan-making.
- 4.45 323 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 F
 - 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 F).

c) 2022 Call for sites – (the 2nd East Devon Call for sites)

- 4.46 This Call for sites commenced on 28 March 2022 and is due to close on 10 May 2022, and therefore not available in time to be included in the 2022 HELAA report – Part 1. The information will therefore inform the preparation of the 2022 HELAA report – Part 2.

d) Mapping of sites identified from Call for sites

- 4.47 All sites identified and considered by the HELAA have to be mapped. This had been undertaken using GIS. This includes sites submitted made through the 'call for sites'. Presentation of HELAA site maps is complicated by the sequence of submissions, resubmissions, withdrawals, overlaps and 'cut-outs', that occurred through the first 2 Call for sites. Sites being submitted through the 2nd East Devon Call for sites will add to that complexity.
- 4.48 Only 'East Devon strategic sites' from the 2017 Call for sites have site references starting 'GH/ED'. All other East Devon sites identified from the 2017 and 2021 Call for sites have a site reference with a 4 or 5 letter code (for the parish) plus a 2 number code to identify the site (e.g. Axmi_01).
- 4.49 To date, the location of HELAA sites has been shown on the interactive map available on the Council's website at [Housing and Economic Land Availability Assessment - East Devon](#).. In addition, information about the GESP 2017 HELAA strategic sites assessment remains available on the GESP website at in pdf document (Appendix F)⁶ .
- 4.50 Where HELAA 2017 Non-GESP sites (i.e. non-strategic) were submitted in 2017 and then resubmitted in 2021 and where the site's boundaries matched exactly, only the top layer (2017) can be seen on the HELAA website's interactive map. For the avoidance of doubt, the 2021 resubmissions have been registered and assessed.
- 4.51 In a few cases, site assessment boundaries are not exactly the same as submission boundaries which also show on the interactive map. This is due to either
- Manual entry of the site boundaries using online entry – so the boundaries in 2017 and 2021 are not exactly the same (eg Sidm_01)
 - An inaccurate boundary from a 2017 submission being superseded by a correct boundary from a 2021 resubmission (e.g. Lymp_07); or
 - A 2017 site already assessed as a strategic site, where a 2021 resubmission has a slightly different boundary but the site has not been reassessed for the HELAA (e.g. GH/ED/72).
- 4.52 Maps of additional sites assessed in the 2022 HELAA report Part 2, will be included in that report.

e) Call for sites - Site overlaps and cut-outs

- 4.53 The volume of HELAA work for the 2022 HELAA report is substantial because of the large number of sites submitted in total (682). The work to analyse the information was 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

⁶ [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](#)

seen by comparing the maps of sites in Appendices D(i) and D(ii). They can also be viewed online on the Interactive map⁷

- 4.54 As the result of this analysis it was necessary to indicate what percentage of each site's net developable area for housing should be counted. In some cases the overlap is partial i.e. more than nil percent and less than 100 percent.
- 4.55 A comparison has been undertaken of each site submitted in both years with other sites submitted either in the same year or in the other year. The conclusions are summarised in the 'overlap description' which is listed in the site lists in Appendices E(i) and E(ii). In many cases the overlap is 100% and therefore Appendices E(i) and E(ii) indicate which of the sites are to be counted as 100% and which are counted as nil.
- 4.56 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. Overlaps are further complicated by the fact that the site boundaries for some 'existing' resubmitted sites were not the same as the 2017 submission. Therefore when assessing the scale of overlap and which site to count:
- For 'non-strategic sites',
 - where there was no change in the land owner, generally the 2021 sites are counted as 100%, and the 2017 site counted as nil (as that part of the 2017 site had not been resubmitted and it is reasonable to assume that the 2017 residue is no longer being promoted as available, and is therefore discounted from the supply analysis.)
 - Where there was a change in land-owner then the 2021 site was counted as 100% and the residue of the 2017 site was counted based on the percentage of the site area
 - For those GESP 2017 'strategic sites' that remain available,
 - Generally, the 2017 site is counted as this was the area assessed in 2017 and counted as 100% unless overlapped by other 2017 sites.
 - Exceptionally, the 2017 site is counted as nil and the 2021 site is counted instead where additional assessment of the 2021 resubmission site was undertaken (for example where a significantly larger site was submitted in 2021.)
- 4.57 A small number of sites have planning permission as at the 2021 Monitoring Point (31 March 2021). These are counted as nil for the supply counts, as they will be counted as planning permissions in the housing trajectory. These available sites have not been assessed but are regarded as suitable and achievable because they have planning permission. The work for HELAA Part 2 will assess whether they are deliverable or developable within the plan period for the emerging Local Plan.

⁷ [Housing and Economic Land Availability Assessment - East Devon](#)

- 4.58 A very small number of sites at Cranbrook lie within the site allocation areas of the adopted East Devon Local Plan, or the emerging Cranbrook plan which is at a very advance stage of preparation. Those sites are counted as nil for the purposes of the supply count. Again, they have not been assessed but are regarded as suitable and achievable. The work for HELAA Part 2 will assess whether they are deliverable or developable within the plan period for the emerging Local Plan.
- 4.59 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 (see Section 6 of this Part 1 report) and for the calculation of net potential housing and employment land supply and in the trajectories.
- 4.60 It has also been essential to discount 'cut outs', for example where a resubmission site omits an area that now has planning permission.
- 4.61 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.
- 4.62 It will be necessary to rerun the overlap check and analysis for all additional sites identified through the 2022 Call for Sites and from the other supply sources, compared to the 2017 and 2021 sites that are being counted.

4. STAGE 1 -Site/broad location survey

1) Initial survey

- 4.63 All sites identified through the 2017 and 2021 Call for sites for inclusion in the HELAA have been mapped and information about them recorded in sites' databases.
- 4.64 Consistent with PPG, work undertaken for the proportionate initial survey in Stage 1 of the HELAA process, has gathered and recorded information about the sites identified through the 2017 and 2021 Call for sites. This initial work helped to resolve inconsistencies in submitted information, gain a better understanding of appropriate type and scale of development, and potential barriers to delivery, plus information of development progress if any on the sites.
- 4.65 The initial survey captured data, focussed on :
- Site size, boundaries, and location;
 - Current land use and character;
 - Land uses and character of surrounding area;
 - Physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities);
 - Potential environmental constraints;
 - Where relevant, development progress (eg ground works completed, number of units started, number of units completed);

- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 4.66 The survey stage relating to the two call for sites took place as follows
- The survey of sites submitted in 2017 occurred in 2 stages:
 - The survey for the 2017 GESP strategic sites was undertaken in 2017/18 as part of the process that resulted in the GESP HELAA report published in 2019.
 - The survey for the non-strategic sites submitted in 2017, including those resubmitted in 2021, was undertaken in 2021.
 - The survey stage for new sites submitted in 2021 was undertaken in 2021.
- 4.67 This initial survey stage occurs before the HELAA Stage 2 – Site assessments (see *section 6 of this report*).
- 4.68 Going forward, the initial survey stage and other HELAA stages will be undertaken for the current 2022 Call for sites and other site sources, and outcomes reported in the HELAA Report– Part 2.
- 4.69 National guidance advises that particular types of land or areas may be excluded from the assessment as long as the reasons are justified.

2) HELAA Methodology Stage A Suitability Assessment

- 4.70 A site is suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable and mixed communities. A two stage approach is applied to determining whether potential sites are in suitable locations for housing and economic development. The types of locations considered unsuitable and removed from the process under Stage A are listed in the table in Paragraph 5.13 in the HELAA methodology in Appendix A to this report:

a) Stage A - tests

- 4.71 The site assessments in Appendix F of HELAA Part 1 report the outcomes of the assessment for Stage A for housing related to following reasons (*see Appendix A – Methodology for more details*)
- Sites below the site size thresholds (*see paragraphs 4.7.and 4.8 of this report*)
 - Sites comprised entirely of land within the functional floodplain (3b) – a precautionary approach was applied where there is no data to distinguish Flood Zone 3a from 3b – to exclude sites wholly in Flood Zone 3
 - Sites for more sensitive uses such as housing, which lie within the Exeter Airport Vector (2017 submission sites) *Note –other noise issues are not reasons to automatically exclude a site from consideration at this stage. They may reduce yield at the Stage 2 assessments*
 - Sites that did not accord with strategically appropriate locations as defined by:

- • The Development Plan (e.g. saved policies, published, submitted or adopted Local Plan);
- Sites that wholly comprise of or have an unacceptable impact on any of the following:
 - Area of Ancient Woodland
 - Designated Site of Special Scientific Interest (SSSI)
 - Designated or possible special area of conservation (SAC)
 - Designated, listed or proposed Ramsar Site (wetlands of international importance)
 - Designated or Potential Special Protection Area (SPA)
 - Sites Identified or required as compensatory measure for adverse effects on European sites, potential SPAs possible SACs and listed or proposed Ramsar sites.

Noise – Exeter Airport Vector

- 4.72 An additional criterion was included in the Stage A Suitability Assessment for the FESP HELAA relating to Exeter Airport’s 57 Decibel Vector, which concerns noise constraints associated with general airport movements⁸. Residential development within the vector is not suitable due to noise and amenity issues, hence the inclusion of this criterion at Stage A. To ensure consistency between the GESP HELAA 2019 results and this HELAA Report Part 1, all the site assessments in Appendix F to this HELAA Report Part 1 have applied the same criteria. It should be noted that other noise sources and their impacts may be taken into account at the Stage B suitability assessment or the achievability assessment, but have not automatically precluded sites from progressing to Stage B. The same approach will need to be applied to the assessment of sites identified from the 2022 Call for sites or additional site sources.

Strategic policy

- 4.73 The suitability assessments of submitted strategic sites include, at Stage A, consideration of whether or not sites are suitable for potential development in terms of ‘strategic policy’. The East Devon Local Plan development strategy is currently emerging and so at this stage it is premature for HELAA to conclude on the locational suitability of submitted strategic sites. Therefore the ‘strategic policy’ element of the suitability assessment is not applied in this edition of the HELAA. The same approach was also taken in the GESP HELAA 2019. The suitability assessments will be updated as the HELAA progresses towards submission and suitable locations for future strategic-scale development are defined. This means that some submitted strategic sites that have passed the Stage A Suitability Assessment in this edition of the HELAA may not pass the Stage A Suitability Assessment in future editions or in the Local Plan allocation site selection process. This approach will need to be applied to the assessment of sites identified from the 2022 Call for sites or additional site sources.

⁸ The vector does take account of additional noise constraints associated with, e.g., engine testing.

b) Passing Stage A – Progressing to Stage 2 (Stage B in Methodology)

- 4.74 Sites which do not pass the HELAA stage A (suitability assessment) for the following reasons (see Appendix A -Methodology) are excluded from the PPG Stage 2 Assessment (referred to as HELAA stage B suitability assessment in the Methodology) and subsequent stages:

5.0 STAGE 2 - Site / broad location detailed assessments

- 5.1 A detailed assessment of site is one of the key components of Stage 2 of the HELAA process set out in the PPG flowchart. All East Devon sites that passed Stage A, including the 83 GESP 2017 strategic sites proceeded to this detailed assessment, unless they already had planning permission or were allocated, or had been superseded by sites resubmitted in 2021. The key assessments made at this stage are whether the sites are available, suitable and achievable.
- 5.2 The focus at this stage is the detailed assessment of whether sites are:
- Available
 - Suitable
 - Achievable
- 5.3 The detailed assessment of the sites identified from the 2017 and 2021 Call for sites that passed Stage A Suitability Assessment are set out in Appendix F of this HELAA report Part 1. Owing to the number of sites and mindful of the matters which PPG indicates should be considered, even with the use of summaries, the site assessment 'profiles' at this stage are about 3-4 pages. The total volume of assessment is therefore huge. This is necessary for the evidence to be robust and consistent with NPPF and PPG. The assessments in Appendix F are divided into the 2017 GESP assessments and the 2021 Assessments, and within each are grouped into parishes, ordered by the site reference number.
- 5.4 Detailed assessment of the sites identified from the 22 Call for sites and other site sources that pass the Stage A Suitability Assessment will be set out in an Appendix in the East Devon HELAA report Part 2.

1) AVAILABLE

- 5.5 The HELAA Report Part1 identifies which sites from the two Call for sites are available and whether they remain available. A second step related to availability is information and assessment about when the sites will be available, which will inform the trajectories to be reported in the HELAA report – Part 2.

a) Identification of available sites

- 5.6 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.
- 5.7 Submitted sites have been confirmed as available for development through the Call for Sites process. This includes evidence demonstrating landownership comes from Land Registry documents provided by the submitters with their HELAA submissions. At this stage the HELAA assumes that this is a sufficient test of availability. However, as the Local Plan progresses towards adoption LPA will

undertake further investigation to determine genuine availability, for example by identifying any legal or ownership issues.

- 5.8 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.

2021 Call for sites data

- 5.9 To be robust, the HELAA evidence needs to be up to date. The 2021 Call for sites confirmed that 193 new sites are available for consideration for development. This is sufficiently up to date for the purposes of HELAA evidence.

2017 Call for sites data

- 5.10 The HELAA has drawn on data from the 2017 Call for sites. That data is now 5 years old. The passage of time means that some of the sites may no longer be available. Of the 359 sites submitted there is sufficiently up to date information on 213 sites as follows:

- Resubmission in 2021 confirmed 30 2017 non-strategic sites are available; and
- Of the 83 Strategic sites
 - 34 sites were resubmitted in 2021
 - 10 sites were confirmed as available through their request to present their sites to Committee in January 2022
 - 1 site was confirmed as available through information supplied to the Council in autumn 2021 for housing monitoring purposes
 - 29 sites have been confirmed in writing that they remain available, following checks in February 2022 with the landowners/agents/developers
 - 5 sites have not been confirmed, although three at Axminster remain under the control of a volume house-builder, and oral evidence indicates that one other site remains available. One site has not been confirmed, but assumed to be available
 - 4 sites were confirmed as no longer available (these are discounted from supply counts and trajectories).

- 5.11 However, 146 of the 2017 non-strategic sites were not resubmitted. One site (Newt_03) has been withdrawn, so is confirmed as no longer available. The analysis in the tables below assumes that 145 sites remain available but it would be prudent to check and confirm their availability before the HELAA report - Part 2 is produced.

b) Available sites - Deliverable and developable

- 5.12 The 2017 and 2021 Call for sites were opportunities to obtain information about the timing of site availability. This is needed to categorise sites as 'deliverable' (i.e. in the next 5 years) or 'developable' (i.e. in years 6+), consistent with the definitions in

NPPF, for the purposes of the housing and employment trajectories and for the 5 year housing land supply assessment as set out in PPG on HELAA.

- 5.13 To help refine the availability assessment, the 2021 Call for Sites process required the promoter to advise on whether a site is available 'within the next 5 years' (i.e. 2021/22 to 2025/26), or 'within the next 6-10 years' (2026/27 to 2030/31), or 'within the next 11-15 years' (2031/32 to 2035/36), or 'in 15+ years' (2036/37 onwards).
- 5.14 To help refine the availability assessment, the 2017 Call for Sites process required the promoter to advise on whether a site is available 'within the next 5 years' (2019/20 to 2023/24), or 'within the next 6-10 years' (2024/25 to 2028/29), or 'within the next 11-15 years' (2029/30 to 2033/34), or 'in 15+ years' (2034/35 onwards).
- 5.15 The 2022 Call for sites has also requested the same information about the timing of site availability. Similar information will need to be sought from landowners/ developers of sites identified from other supply sources.
- 5.16 The HELAA Report Part 2 will be considering the implications of that information for the purposes of preparing the housing and employment trajectories. It may be necessary to request an update on the timing of site availability from sites submitted in 2017 where the site wasn't resubmitted in 2021.

2) SUITABLE (HELAA Methodology - Stage B assessment)

- 5.17 The Council as LPA is responsible for gathering and analysing evidence to assess whether submitted sites are suitable for potential development for HELAA purposes.

a) Suitability of planning commitments

- 5.18 Some sites submitted through the Call for sites now have planning permission or are sites allocations in Development Plan Documents. Paragraph 5.15 of the HELAA Methodology establishes that planning commitments are to be regarded as suitable for housing or economic development by virtue to their consent or allocation, unless there have been subsequent changes of circumstance which may affect this position, and there is evidence to demonstrate the change.
- 5.19 On this basis, the HELAA concludes that all planning commitments for housing are suitable for their consented or allocated use (including the Cranbrook Plan which is at a very advanced stage of plan making – post Main Modifications). This position will be reviewed in future editions of the HELAA. This information is used in both the site assessment profiles in Appendix F and in the supply counts and trajectories (the latter will be set out in HELAA Report Part 2).

b) Suitability Assessment of sites identified from Call for sites

- 5.20 The HELAA Report – Part 1 suitability assessment of sites focusses on sites identified from two Call for sites:
 - i. 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.

- ii. The EDDC database of constraints, services and facilities, plus comments received eg from Devon County Council relating to Minerals, Waste and Highways/access. This information was used to assess the non-strategic sites from 2017, and the sites submitted in 2021.
- 5.21 The suitability for potential housing and employment development of submitted 2017 strategic sites has been assessed in accordance with paragraphs 5.13 to 5.14 of the HELAA Methodology. The results of the suitability assessments are presented in the site assessment profiles in Appendix F of this report. The suitability assessments of sites identified from the 2017 Call for sites were undertaken by planning officers from the GESP authorities in consultation with statutory bodies⁹, infrastructure providers¹⁰ and other local authority officers¹¹.
- 5.22 The suitability assessments of sites identified from the 2021 Call for sites were undertaken by planning officers from East Devon District Council in consultation with other local authority officers and Devon County Council. The suitability for potential housing and employment development of submitted sites has been assessed in accordance with paragraphs 5.13 to 5.14 of the HELAA Methodology. The results of the suitability assessments are presented in the site assessment profiles in Appendix F of this report.

Stage B –process and tests

- 5.23 Databases have assisted in this process of assessing suitability. Nevertheless, the volume of sites 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 relevant thresholds are set out in the next paragraph*).

i. 5 key tests

- 5.24 This part of the assessment sites identified from the 2017 and 2021 Call for Sites required significant work to reach conclusions about the following matters which were used to determine whether a site has passed ‘Stage B’ of the detailed assessment of the suitability of submitted sites for housing and for employment:
1. **Is the site an unacceptable distance from a reasonable range of services and facilities?** (The threshold for housing is the site is within 1600 metres of 4 or more services/facilities, and the threshold for employment is the site is within 1600 metres of a train station or bus route with an hourly or better service). This includes some key issues about infrastructure
 2. **Will the site have an unacceptable impact on biodiversity?** (For housing and employment, the threshold means the site being located entirely within a designated biodiversity site *i.e. RAMSAR sites, NNRs, LNRs, Marine Conservation Areas Ancient Woodlands - where the impact on the sites*

⁹ Environment Agency, Highways England, Historic England, and Natural England.

¹⁰ Including South West Water, Western Power and National Grid.

¹¹ Highways, Minerals and Waste, Economic Development, Flood Risk, Conservation, Ecology, Environmental Health, Landscape, Archaeology, Education and GI Officers.

cannot be mitigated. This does not include County Wildlife Sites or TPOs but they may reduce the yield)

3. **Will the site have an unacceptable impact on heritage?** For housing and employment, the assessment is based on the impact on the significance of individual and 'in combination' heritage assets (*i.e. Listed Buildings, Conservation Areas, Ancient Monuments, Historic Parks*).
4. **Will the site have an unacceptable impact on landscape?** – The assessment records whether the site is within the AONB, but at this stage sites within the AONB are not automatically ruled out.
5. **Will the site have an unacceptable impact on flooding/land/resources?:** Sites wholly within Flood Zone 3 did not pass Stage A and are not assessed. *For those sites which pass Stage A, No sites are ruled out on Agricultural Land Classification, flooding or water grounds currently. If the entirety of the site is a designated Local Green Space (NPPF definition) then it is considered unacceptable. If Devon CC (as Mineral Planning Authority) also object to its inclusion on minerals or waste grounds then it is also unacceptable (but see paragraphs 5.27- 5.28 below).*

5.25 The Site Assessment Profiles in Appendix F summarises the assessment for Failure on any one of the 5 suitability tests results (*i.e.* where the answer to the question in the test is YES) results in the site not passing the overall suitability test and not passing Stage B.

ii. **Devon County Council comments**

5.26 Additional comments on education, highways, minerals and waste matters, including some key infrastructure matters, are provided by Devon County Council, which informs the HELAA Panel consideration of sites, and may modify the EDDC officers' assessment of site suitability. National Highways also provided opinions on sites through the Panel. The comments have informed the assessments of sites either through the suitability or achievability assessments.¹²

5.27 Devon County Council as Mineral Planning Authority has objected to the inclusion of some sites on minerals grounds, reported in site assessment profiles in Appendix F. This is on the basis that development has the potential to constrain future working within other parts of the Mineral Safeguarding Area but the MPA have caveated their objection by adding the following comment:

“It is open to EDDC to commission a Mineral Resource Assessment to establish the potential economic value of the mineral resource if it wishes to pursue allocation of this site” (*specifying the type of mineral as relevant*)

5.28 No decision has been made by EDDC at this stage to not commission or secure a Mineral Resource Assessment. So it would be premature to pre-empt that decision in this HELAA. Consequently, those sites which are subject to an MPA comment have not failed the Stage B test. However, the issue of the need for an MRA was taken into account by the HELAA Panel for the achievability assessment, and this is

¹² Natural England, Historic England and the Environment Agency were also invited to participate on the Panel as a means to inform the HELAA process, but declined.

reported in site assessment profiles in Appendix F. The same approach will need to be applied to the assessment of sites identified from the 2022 Call for sites or additional site sources.

iii. **Safety**

- 5.29 A sixth factor was also assessed regarding safety, and the assessment is reported in Appendix F to this HELAA Report Part 1:

Safety – are there any other issues identified? This includes major pylons/overhead high voltage electricity power lines or underground HSE major hazards (eg high pressure gas pipelines). The area of the pylons and pipelines and their easements or consultation zones are taken into account. At this stage of the HELAA it is prudent to exclude those areas from the net development area that passes Stage B suitability assessment for the purposes of calculating the development potential of sites that are suitable (and hence the development potential of sites that are suitable, available and achievable). If further evidence related to safety becomes available in the future, this will need to be taken into account and may result in amended net developable areas and amended site potential capacity/yields. The same approach will need to be applied to the assessment of sites identified from the 2022 Call for sites or additional site sources.

iv. **Carry forward of 2017 Strategic Sites Suitability assessment**

- 5.30 Generally, it has not been necessary to reassess the strategic sites which had been assessed in 2017. This includes those strategic sites where sites resubmitted through the 2021 Call for sites had minor boundary changes. Those assessments are therefore available to be combined with the Information about sites in East Devon put forward through the 2021 call for sites. Whilst the 2017 'Strategic sites' were not reassessed for suitability and achievability they were checked on their availability in February 2022, through contacting the submitters or their current agents and receipt of emailed responses. They were also checked for overlaps with resubmitted sites and the decision about the percentage of site to count for the supply count is included in the list in Appendix D(i).
- 5.31 The other, non-strategic sites put forward in 2017 were not assessed at that time. Therefore it has now been necessary to assess the East Devon sites so that they can inform plan-making. This is in line with the Strategic Planning Committee's resolution in December 2020 to assess the smaller sites submitted into the GESP call for sites in 2017, to ensure that the Council has an up to date picture of available sites across the District.

v. **Site Visits**

- 5.32 The large number of sites submitted through the 2017 and 2021 Call for sites which met the Stage criteria for inclusion in the assessment meant that it was not practical for all sites to be visited by EDDC officers. Consistent with the PPG, the Council has made use of other information, include aerial photographs, site photographs, officer knowledge about sites and GIS mapping and database information.

5.33 Site visits were undertaken for the East Devon Urban Capacity study. However, some site visits may need to be carried out for other sites which meet the Stage A criteria for inclusion in the assessment that are identified through

- The 2022 East Devon Call for sites to be assessed in HELAA Part 2; and
- The other sources of supply that will be assessed in the HELAA Part 2.

c) ACHIEVABLE

5.34 A site is considered achievable for development where there is a reasonable prospect that development will take place on the site at a particular point in time. This is essentially a judgement about the economic viability of a site and the capacity of the developer to complete and let or sell the development over a certain period.

5.35 As with the suitability element of the assessment, the HELAA has assessed all planning commitments for housing as achievable for their consented or allocated use unless the LPA aware of any changes of circumstance which may affect this position.

i) HELAA Panels

5.36 Integral to the preparation of HELAA is a 'panel' of key stakeholders who have a recognised interest in the development of land for housing and employment.

Panel Constitution, Terms of reference, Membership

5.37 The assessment of site achievability has been undertaken by HELAA Panels for sites identified from the 2017 and 2021 Call for sites. This is in accordance with the HELAA Panel Constitution and Terms of Reference, in operation at the time. It is emphasised that the HELAA Panel provides expert views on site achievability but the Panel is not responsible for the overall HELAA.

5.38 Membership of the panel is representative of the broad cross-section of the housing and economic development sectors, including house builders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations. The 2021 Panel for example included EDDC Councillors.

Panel Role

5.39 The Panel operates in an advisory capacity, making use of their specialist knowledge. The LPA identified whether sites are 'available' and 'suitable', and the Panel then advised on 'achievability'. Panel members such as the Environment Agency and Natural England, if participating, also advise further on suitability of sites if required. The expertise and knowledge of Panel members is important in helping the LPA to identify deliverable and developable sites which can contribute to the supply of housing and employment land. Panel members were not precluded from commenting on sites they have an interest in, however, they were required to declare an interest if they have a site under consideration.

- 5.40 It has been the role of the HELAA Panels to use their knowledge and experience of housing and economic development in the East Devon area to advise the LPA on the achievability of submitted strategic sites. In doing so, the Panel has taken into account any constraints to development identified in the suitability assessments, the information provided by promoters on the timing of site availability, potential planning policy requirements (e.g. affordable housing and open space), the current planning status of sites and local knowledge
- 5.41 The latest agreed joint methodology for the HELAA includes provision for a Panel to provide opinion about the HELAA methodology and the achievability of sites. The Panel comprises key stakeholders who have a recognised interest and experience in the development of land for housing and employment. They participate on a voluntary basis.
- 5.42 Using a HELAA Panel to consider sites' 'achievability' is promoted by PPG but not mandatory. The Panel process has been successful in the production of past HELAAs in this area. The Panel constitution and terms of reference was previously jointly adopted in 2016 by the authorities in the Exeter housing market area. These have been used to regulate the formation, structure, role and operation of the panel since then. A common approach to HELAA production across the Exeter housing market area is considered to be sensible in terms of use of resources and mindful of the duty to co-operate.

ii) 2017 Call for sites HELAA Panel

- 5.43 A HELAA Panel met in 2018 to consider the strategic sites identified from the 2017 Call for sites. Their conclusions on the potential achievability of the 83 strategic sites in East Devon were set out in the GESP HELAA report (2019), and are reproduced in an Appendix in the East Devon HELAA – Part 1 report. Those achievability conclusions have generally not been revisited because specific issues about individual sites' are unlikely to have changed significantly in the last 5 years, although the wider economic context continues to evolve. Information about the 83 sites' availability has been updated, and this is taken into account in the calculations about potential supply which will inform the trajectories. Likewise a small number of potential capacity assessments have been modified eg to take account of gas pipelines and their consultation zones.
- 5.44 Where submitted strategic sites adjoined each other, the HELAA Panel assessed achievability across the sites as a whole rather than on an individual site basis. This was because some submitted strategic sites only qualify as 'strategic' on grounds that they adjoin other submitted sites. The Panel assessed the achievability of standalone submitted strategic sites on an individual basis. The approach taken to assessing the achievability of each site was clarified in Appendix F to the GESP HELAA report.
- 5.45 The results of the GESP HELAA achievability assessment are reported in the Site assessment profiles in Appendix F to this current HELAA Part 1 report.
- 5.46 It may be necessary for the HELAA Part 2 stage to ask a HELAA to revisit the achievability conclusions about sites that had been assessed 'in combination', to provide a conclusion on an individual site basis, to inform the site potential capacity and the count of potential supply for the trajectory.

iii) 2021 Call for Sites HELAA Panel

- 5.47 To be consistent with the 2019 HELAA approach and evidence which the Council is relying on, it is therefore necessary to use a HELAA Panel to assess the new sites identified through the 2021 East Devon Call for sites, as well as the 2017 non-strategic East Devon sites, including those resubmitted, which were not assessed for achievability as part of the GESP HELAA 2019 report.

Updated HELAA Panel constitution and Terms of Reference (2021)

- 5.48 For the avoidance of doubt, the 2021 East Devon HELAA - Part 1, appended, is the responsibility of East Devon District Council. The HELAA Panel's role is advisory, focused on the HELAA methodology and on assessing the 'achievability' of submitted sites.
- 5.49 On 22 June 2021, Committee resolved that further information on the composition of the HELAA panel is brought back to Committee before the HELAA panel's first meeting to be set out including the role of local Members on the Panel. At their meeting on 7 September 2021, Members subsequently considered the revised constitution and terms of reference of the HELAA Panel. The revisions were minor, reflecting recent changes to PPG. Committee resolved:
- To agree the constitution and terms of reference of the HELAA Panel (including the minor changes reflecting recent changes to PPG)
 - To appoint the Portfolio Holder for Economy and Assets and the Portfolio Holder for Strategic Planning onto the HELAA Panel
 - To agree to delegate authority 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 panel's constitution and terms of reference by the Panel.
- 5.50 Following this, the Panel constitution and terms of reference was shared with partner authorities in the Exeter Housing Market Area. They are reproduced as Appendix B in this HELAA report - Part 1. EDDC officers identified potential participants for the categories as set out in the constitution, and shared this with the partner authorities. The potential participants were invited to participate in the HELAA Panel. Most accepted the invitation, replacements were sought for those who didn't accept, where possible.
- 5.51 It should be noted that Natural England, Historic England and the Environment Agency declined or didn't respond to the invitation to be Panel members. Whilst they have not actively engaged at this early stage of evidence production, they will still have the opportunity to respond to the plan-making consultation stages.

2021/2022- Panel meetings held

- 5.52 The East Devon HELAA Panel inception meeting, held on 21 October 2021, agreed the HELAA 2021 Methodology and confirmed the Panel constitution and terms of reference.
- 5.53 Four panel meeting were then held to discuss sites. Prior to those meetings, the Panel received information about the sites, prepared by EDDC officers. To make

the Panel meetings manageable, three Panel meetings were held in November and December 2021 to discuss all the large identified housing sites. Due to the high number of smaller housing sites, officers suggested achievability conclusions, and at the last December meeting the Panel discussed only those sites where they queried the suggested conclusion. A fourth Panel meeting was held in January 2022 to consider the 38 identified employment led sites from the 2017 and 2021 Call for Sites.

Panel assessment of Achievability – 2021/2022

- 5.54 The 2021 HELAA Panel's conclusions about achievability are recorded in the 2021 site assessments in an Appendix F to this HELAA Report- Part 1.
- 5.55 One or more HELAA Panels will need to be held to consider the achievability of any new sites identified from the 2022 Call for sites from other supply sources. The Panel's conclusions will be reported in the relevant site assessment profiles in the HELAA Report – Part 2.
- 5.56 Submitted sites that have not passed the achievability assessment have been given a '0 yield' for housing development in Appendix F.
- 5.57 Likewise sites identified through the 2022 Call for sites or other supply sources and which a future HELAA Panel conclude as 'probably unachievable or probably unachievable unless' will not pass the achievability test and will be given a 0 yield for the potential supply count and trajectory.
- 5.58 The 2021 HELAA Panel assessed achievability on an individual site basis. Owing to the large number of sites,
- EDDC officers suggested achievability assessments for small sites and circulated this to the Panel members before the relevant Panel meeting asking them to identify any sites where they disagreed with the suggested assessment before the meeting. The Panel then
 - Considered those sites and where they reached a different conclusion to that suggested, it is the HELAA Panel conclusion that has been recorded in the site assessment profiles in Appendix F of this Part 1 report.
 - Where the Panel agreed with the suggested small sites achievability assessment, the conclusions are recorded in the site assessment in Appendix F of this Part 1 report.
 - The Panel considered all the large sites identified through the 2021 Call for sites. Their conclusions are recorded in the site assessment in Appendix F of this HELAA Part 1 report.

Categories of Achievability

- 5.59 The HELAA Part 1 analysis uses four categories of achievability conclusions:
1. Probably achievable
 2. Probably achievable if (usually one or more mitigation measure that are likely to be necessary but would probably still leave the development viable)

3. Probably unachievable
4. Probably unachievable unless (usually one or more mitigation measure that are likely to be necessary but would probably be of such a magnitude or cost that they would: make the development unviable; or require a level of evidence that is either not available at this time, or are unlikely to become available; or eg require third party land across several ownerships not in the control of the site submitter.)

5.60 Counts of potential capacity/supply that are 'achievable', which are set out in this HELAA report - Part 1, are based on the two categories of "probably achievable" and "probably achievable if".

6.0 STAGE 2 - Assessing site development potential

- 6.1 Planning Practice Guidance on HELAA includes guidance on the assessment of the development potential of each identified site that is assessed at Stage 2 of the HELAA process.

Development potential of planning commitments.

- 6.2 As regards planning commitments, the HELAA assumes that a site's development potential is the same as the number of homes for which consent has been granted or for which the site is allocated in an existing plan.

Development potential of all other sites assessed at Stage 2

- 6.3 A calculation is used for other identified sites that are not planning commitments. The whole area of a proposed site may not all be developable. This is because the area for development on larger sites may be reduced through the provision of access roads, strategic open space or landscaping. The development potential of individual sites may also be affected by constraints such as biodiversity conservation, protected trees or the presence of heritage assets.
- 6.4 Paragraphs 5.7 to 5.12 of the HELAA Methodology set out how the development potential of sites are assessed, unless otherwise specified in a site's assessment profile.

1. Gross to net ratio

- 6.5 **First, the gross development area of a site is calculated.** The gross development area is taken to be the whole of the site area of the submitted site, as measured by the GIS mapping of a site, for a development excluding any unsuitable land identified at STAGE A of the HELAA assessment. This may be further adjusted following STAGE B of the HELAA assessment. The gross development area is recorded in the Site assessment profile for each site set out in Appendix F to this HELAA report - Part 1.
- 6.6 **Then the net developable area is calculated for housing.** The net developable area is taken to be the residue of the gross development area site area which remains for the delivery of the development considered. For housing/employment uses, this can include buildings for these uses, garages, gardens, driveways, amenity space, service/estate roads, parking areas, children's play space, local centre amenities (shops) and incidental green space (Space Left Over After Planning – SLOAP). The net developable area is what area remains after subtracting other required land uses such as highways infrastructure, sports pitches, allotments, parks, Sustainable Urban Drainage Systems (SUDS), schools and other infrastructure requirements.
- 6.7 To reflect the realistic developable site area, indicative 'gross to net ratios' will be applied to all sites. Exceptions to this rule will only be acceptable where evidence justifies an alternative ratio (such as through testing against similar locations) or on advice from the HELAA panel.

- 6.8 At this early stage, the HELAA uses a calculation to reduce the gross site area by a percentage ratio to calculate the net developable area. The percentage ratio is dependent on the location type and the submitted site's total site size. The percentages for housing and employment are set out in the Table in paragraph 5.9 on the HELAA methodology in Appendix A to this Part 1 report.
- 6.9 **For employment sites, only the gross development area is used** (see Appendix A Methodology – paragraph 5.10).
- 6.10 The same approach to converting gross development area to net developable area will be applied to sites identified from the 2022 Call for sites and other supply sources, to be set out in HELAA report – Part 2.

2. Density

- 6.11 The Methodology report – Paragraph 5.11 sets out the second part of calculating potential capacity which requires that a density assumption is applied to the net developable area. Table 5.11 sets out the assumptions which depend on the type of location.
- 6.12 Most of the 83 GESP strategic sites use the 31-40 dwellings/ha assumption.
- 6.13 Most of the other 2017 and 2021 submitted sites are suburban/rural settlements-type locations. Whilst the table in paragraph 5.11 of the Methodology indicates a density of 20-35 for that location type, paragraph 5.11 does allow the LPA to vary this assumption. At this early stage the LPA considers that it is prudent to use a density assumption of 20 to 30 dwellings per hectare (with a mid-point of 25 dwellings/ha) for the HELAA report – Part 1 at this stage of the HELAA process. This is prudent because the volume of sites to be assessed has been particularly challenging in terms of considering site specific constraints such as local housing densities in settlements in this rural area. Although sites need to make efficient use of land, over estimating density at this stage could be problematic if subsequent site design were to result in fewer dwellings that lead to insufficient sites being considered for the site selection process.
- 6.14 The volume of sites to be assessed has also been challenging in terms of considering some site specific constraints at this stage such as steep slopes, noise and air quality impacts.
- 6.15 Furthermore, on sites promoted for mixed use, the HELAA methodology formula for calculating potential housing yield does not make a specific adjustment for employment uses. Such an adjustment would reduce the housing yield but the balance of housing to employment uses needs further information and policy input which is not yet available. It is important not to pre-empt emerging Local Plan strategy and policy decisions at this stage of the HELAA process.
- 6.16 More information about site characteristics will be sought that will help to inform site design work and analysis as the Local Plan progresses towards adoption, which will probably change potential site capacities.
- 6.17 The Council has taken a further pragmatic approach to avoid over estimating site potential housing yield/capacity at this stage, by taking into account the submitters'

assessments of potential housing capacity, which will have been informed by local site characteristics. The site assessment profiles in Appendix F record the upper figure of potential capacity provided by submitters (where provided and where clear). The profile records whichever is the lower of: the submitter's potential capacity or the net developable area.

- 6.18 Finally, the site potential capacity based on the lower of: the submitter's potential capacity or the net developable area is moderated by the percentage of site to count to avoid site overlaps. This is also recorded in the site assessment profiles in Appendix F to this HELAA – Part 1 report.
- 6.19 The assessed site development potential is the data source about yield to include in the calculations of supply for the trajectories, to be reported in HELAA Report – Part 2.
- 6.20 The site potential capacity may change in the future as further information about a site becomes available and additional assessments undertaken.

7.0 STAGE 3 - Windfall Assessment

- 7.1 The PPG flowchart includes a stage for determining the housing and economic development potential of windfall sites (where justified).
- 7.2 The windfall assessment for East Devon will be reported at HELAA Report – Part 2 stage. Current evidence for housing windfalls comes from the East Devon Housing Monitoring Update report published annually by the District Council. The most recent publication is for the 2021 Monitoring Point (31 March 2021) Work in progress on the East Devon employment monitoring for the 2021 Monitoring Point is well advanced. The HELAA Report – Part 2 will consider whether a forecast of potential windfall employment sites can be justified.

8.0 STAGE 4 – Assessment Review

8.1 The PPG flowchart includes a stage for an assessment review, in two parts, as follows:

- a) Assessment of development need for housing and economic development uses
- b) Review assessment and prepare draft trajectory - Enough sites/broad locations

8.2 The overall assessment for East Devon for housing and for employment will be reported at HELAA Report – Part 2 stage. It is important at this stage that the HELAA does not to pre-empt emerging evidence about the level of housing and employment land need nor to pre-empt the Council's decisions about strategy for addressing need.

8.3 A preliminary assessment of potential housing capacity from sites identified through the 2017 and 2021 Call for sites is set out in Tables 1 to 12 below:

Summary Tables: Housing Capacity

8.4 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.

8.5 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

8.6 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

8.7 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

8.8 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

8.9 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.

8.10 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.

8.11 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

8.12 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

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

8.14 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

8.15 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

8.16 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

- 8.17 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

- 8.18 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.
- 8.19 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

- 8.20 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

- 8.21 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.
- 8.22 The analysis in Tables 1 to 12 will be superseded by the assessments in HELAA report – Part 2.
- 8.23 The scale of potential housing capacity does not imply that all of the land on sites identified as 'available, suitable, and achievable' will be allocated in the Local Plan. Further work will be undertaken by the Council through the site selection process to identify sites for housing or mixed use (including housing) allocations in the Local Plan, as the plan progresses to publication stage, and then towards adoption.
- 8.24 The HELAA Report - Part 2 will need to give specific consideration to the potential supply of Gypsies, Travellers and Travelling Showpeople sites. There has been a long standing challenge of identifying sites in East Devon for accommodating these needs. 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.

Trajectories

- 8.25 The second part of HELAA Stage 4 will need to produce draft housing and employment trajectories, to forecast completions of housing and employment development within East Devon on a year by year basis. This will be based on the combined, assessed potential net housing and employment capacity of all sites identified through the Part 1 and Part 2 assessments (with overlaps removed) and including the windfall assessment and the identified capacity from planning commitments (planning approval, and local plan allocations).
- 8.26 The housing trajectory in the annual East Devon Housing Monitoring update does not include all the HELAA sites. So a separate housing trajectory for the 2022 HELAA will be prepared for the HELAA Report – Part 2.
- 8.27 For sites assessed as having housing development potential the HELAA must take into account likely delivery rates in order to produce a housing trajectory. This will also inform the calculation of a 5 year housing land supply East Devon for HELAA purposes.

- 8.28 As explained in paragraph 7.2 to 7.4 of the HELAA Methodology, the HELAA Panel has agreed standard and 'market condition' models to determine commencement and housing delivery rates for existing planning commitments and submitted strategic sites that have passed the tests of suitability, availability and achievability. The models are contained in Appendices 1 and 2 of the HELAA Methodology and are based upon the Panel's knowledge of the development industry's capacity to build.
- 8.29 The 2021 models reflect revisions made in the NPPF to the definition of a 'deliverable' site for housing. The new version of the models are to be used to determine commencement and housing delivery rates for existing planning commitments and submitted strategic sites. The details will be set out in the HELAA report – Part 2. This information will be used to populate the forecasts of completions within the housing trajectory.
- 8.30 The HELAA Methodology does not include a delivery model for employment sites. Instead, it has been agreed with the Panel that the timing of delivery of sites with economic development potential should be considered on a case by case basis, informed by site specifics and advice provided by the Panel.
- 8.31 The HELAA report – Part 2 will then assess whether there are enough sites/broad locations compared to the level of housing and employment need. Evidence about need assessments will be provided by the results of the Local Housing Need Assessment and the Economic Needs Assessment (the latter is focused on business use needs).
- 8.32 Trajectories are presented in the form of a table. For example, as spreadsheet was included in Appendix H of the GESP HELAA report 2019. It summarised the spreadsheet at Appendix H of this report summarises the potential rate of housing delivery between 2018/19 and 2039/40 from planning commitments and submitted strategic sites that have passed the tests of suitability, availability and achievability. However, the GESP HELAA report did not produce district level trajectories.
- 8.33 Tables for the housing and employment trajectories will be included in the HELAA Report – Part 2.
- 8.34 Based on the trajectories and the assessed housing and employment development needs, if the assessment concludes that there are not enough sites/broad locations, then the Council may need to consider options such as:
- A further Call for sites
 - Revisiting assumptions and assessments to see if there are ways to mitigate constraints;
 - Exploring the implications if insufficient supply can be identified compared to the assessed housing or employment development needs.

9.0 STAGE 5 - Final Evidence Base

- 9.1 If there are enough sites/broad locations, then the final stage of HELAA as set out in the PPG flowchart focuses on
- a) Publication of the evidence base
 - b) Identification of how much of the potential capacity that is suitable, available and achievable is
 - Deliverable for the specified use (i.e. can be completed in years 1 to 5)
 - Developable for the specified use (i.e. can be completed in years 6+)
- 9.2 This stage may be reached at the HELAA Report - part 2 stage, if the report concludes that enough sites/broad locations have been identified.
- 9.3 PPG HELAA indicates the following the assessment a set of standard outputs are expected to be produced as follows:
- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - An assessment of each site or broad location, including:
 - Where these have been discounted, evidence justifying reasons given;
 - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
 - An indicative trajectory of anticipated development based on the evidence available.
- 9.4 Appendices D(i), D(ii), E(i), and E(ii) provide early information that will feed into the output to be included in the combined 2022 East Devon HELAA report.