# East Devon Local Plan 2020-2040 – Site Selection Methodology (May 2022)

## Introduction

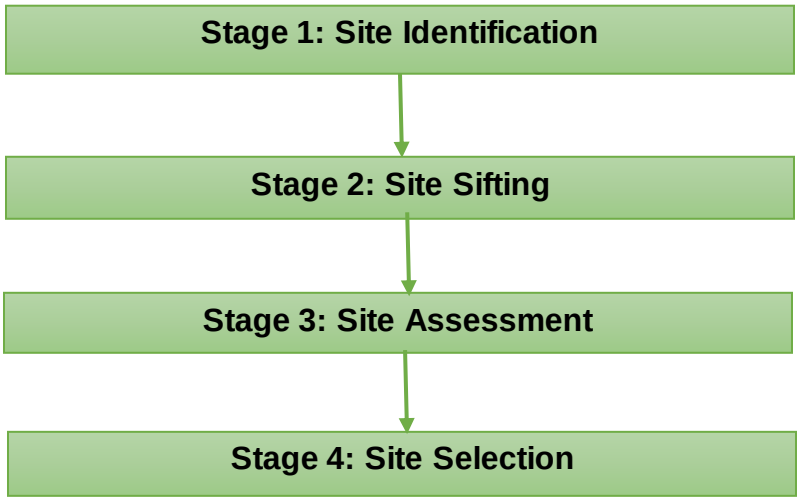
1.1 East Devon District Council is preparing a Local Plan covering the period 2020 to 2040 that will allocate sites for development. This site selection methodology explains the process of how sites are identified, assessed, and selected for allocation, or not. The process will consider housing and employment allocations.

1.2 A separate 'Site Selection' report will contain the assessment of sites and identify those which are preferred to allocate, alongside those that are recommended to not be allocated, with reasons why. The purpose of the Site Selection report will be to explain how we have chosen the sites that meet the Local Plan strategy for the distribution of development. The Site Selection report will collate evidence from numerous other sources, rather than create 'new' evidence.

1.3 It is important to note that, to be considered as 'sound', the Local Plan will need to be an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence.[1]

1.4 The process for site selection is shown in the diagram below.

**Figure 1: Site selection process**




1.5 The following sections explain how each of the four stages in the diagram will be carried out.

## Stage 1: Site Identification

1.6 There are several sources of sites with the potential to be allocated in the Local Plan. The following sources will be considered for the site selection process:

- Housing and Employment Land Availability Assessment (HELAA)
- Urban Capacity Study (2021)[2]

[1] National Planning Policy Framework, paragraph 35b.
[2] Available at: 300321bpurbancapacitystudyappendix1assessments.pdf (eastdevon.gov.uk)

- Brownfield land register[3]
- Local Plan 2013-2031 allocations where a planning application has not been submitted[4]
- Local Plan 2020-2040 consultation responses[5]

1.7 Incorporating these sources should ensure that all sites where development may be possible are identified for potential inclusion in the Local Plan 2020-2040.

**Stage 2: Site Sifting**

1.8 Following the 'long list' of sites identified in Stage 1, a 'sifting' process will be carried out to ensure that only 'reasonable alternatives' are considered further. Only sites which meet criteria a), b) and c) are carried forward to Stage 3. These criteria are shown in figure 2 below.

**Figure 2: Sifting criteria**

| Sifting criteria | Reason |
|---|---|
| a) Site is assessed as 'suitable, available and achievable' in the HELAA[6] | To ensure only sites of a sufficient size[7] in an appropriate location and without significant constraints are considered for potential allocation. |
| b) Site is located:<br>○ within, or adjacent to, settlements in Tiers 1-4 of the settlement hierarchy (excluding Cranbrook[8]); or<br>○ adjoining another site that is adjacent to a settlement in Tiers 1-4, and is also well related to that settlement; or<br>○ as a freestanding new settlement or able to be part of a new settlement[9]; or<br>○ adjacent to Exeter or other development in the West End; or | To reflect the settlement strategy in the emerging Local Plan 2020-2040. |

[3] Published December 2020: 2020eddcbrownfieldlandregister.pdf (eastdevon.gov.uk) Nb. All of 2020 BLR sites are included in the Urban Capacity Study 2021, but future versions of the BLR may identify additional sites.
[4] Consistent with NPPF paragraph 122.
[5] Sites in the Urban Capacity Study, Brownfield land register, Local Plan allocations, and consultation responses may also be in the HELAA.
[6] It is assumed that sites within 400m of the Pebblebed Heaths SAC will be ruled out as being unsuitable in the HELAA but, if not, such sites should be sifted out at Stage 2.
[7] The HELAA site size thresholds are housing sites that can deliver at least five dwellings (gross) or 0.15 hectares in size; and employment sites of at least 0.25 hectares or 500 sq m of floor space.
[8] Cranbrook is outside the scope of the Local Plan 2020-2040, as it is being addressed in the emerging Cranbrook Plan.
[9] Small sites located in 'areas of search' for a new settlement will be taken forward to Stage 3 even if, in isolation, they are not assessed as suitable, available, achievable in the HELAA. This is because such sites may be able to contribute to larger sites that, together, deliver a new settlement.

| | |
|---|---|
| ○ adjacent to an existing business park (if proposed for employment use) | |
| c) Sites in criteria a) or b) that already have planning permission will not be considered | The Local Plan will not allocate sites that already have planning permission, as they are assumed to be deliverable. |

1.9 There will be cases where the same sites crop up from the different sources at Stage 1, and even within the same source e.g. the HELAA has overlapping sites arising from different 'call for sites' submissions. Stage 2 should note sites that overlap completely (i.e. 100% overlap) – these sites will go forward to Stage 3 to avoid assessing the same site twice. Stage 2 should also note sites that partially overlap, with the separate parts of each site subject to assessment at Stage 3.

**Stage 3: Site Assessment**

1.10 A Site Assessment form will be completed for all sites that make it through the 'sifting' stage. This form contains some identifying details relating to the site (address, size, proposed use etc.) and then sets out a series of selection criteria relating to the key planning issues for assessing sites. The yield for each site will use the HELAA as the starting point, amended as appropriate to reflect Local Plan consultation responses, and local character and any opportunities or constraints identified in the site assessment.

1.11 Commentary for each of the selection criteria is contained in the assessment column. Appendix one contains the Site Assessment form – the considerations for each site selection criteria follows below.

**Sustainability Appraisal findings**

1.12 A Sustainability Appraisal (SA) is being prepared to promote sustainable development by assessing how the Local Plan, when judged against reasonable alternatives, will help to achieve environmental, economic and social objectives. The SA will assess each site that is considered to be a 'reasonable alternative', and explain the likely significant effects that are predicted to arise against a series of sustainability objectives. The SA will summarise the effects for each sustainability objective on a range from major positive to major negatives, along with any uncertain or mixed effects.

1.13 The site assessment will record any major positive or major negative effects, as identified in the SA report. It is important to note that the full assessment of effects for each site has been considered, but the purpose of the Site Selection report is to highlight the more significant effects.

**Infrastructure implications**

1.14 This section will highlight any known infrastructure issues that may arise from developing the site. This will reflect HELAA comments with regards to education and highways made by Devon County Council for each site. Other known infrastructure requirements will also be identified where relevant, such as those relating to flood risk, sport and recreation, community facilities, healthcare, and utilities (including overhead power lines, and whether any HSE major hazard pipelines zones pass through the site).

**Landscape sensitivity**

1.15 The rural nature of East Devon means that landscape impact is often a key factor when selecting sites for development. This section of the form will summarise the findings of the landscape sensitivity analysis undertaken for each site. This analysis considers a range of criteria relating to landscape and visual sensitivities, and then places the site into the following sensitivity ratings:

- Low
- Low/medium
- Medium
- Medium/high
- High

1.16 If a site has a mixture of landscape sensitivity categories, these are summarised on the form.

**Impact on Historic environment**

1.17 The impact on heritage assets and their setting has been considered through a separate Historic Environment Site Assessment (HESA) for those sites that make it through to Stage 3. The HESA reflects Historic England (HE) guidance[10] and its methodology for selecting sites, based around five 'steps':

i. Identify which heritage assets are affected by potential site
ii. Existing contribution of site to the significance of heritage asset
iii. Identify impact of the potential allocation on significance of heritage asset
iv. Maximise enhancements and avoid harm
v. Determine whether potential allocation is appropriate in light of NPPF tests of soundness``

1.18 The Site Selection report will summarise the findings of the HESA, identifying the impact of allocating the site on the historic environment as either:

- Major: considerable change affecting the special character of assets including their setting, where the significance of those elements is substantially harmed or lost.
- Moderate: change affecting the special character of assets, where elements which contribute to their significance and their setting are harmed.
- Minor: limited change to elements that contribute to the significance of assets and their setting, where harm is minimal.
- Beneficial: elements which contribute to the significance of assets, including their setting, are enhanced or better revealed.
- No change: no change to assets of their settings.

1.19 To identify the key impacts and ensure a proportionate approach is taken, the HESA will consider the impact upon up to five heritage assets most likely to be affected, unless there are exceptional circumstances that warrant consideration of a larger number of heritage assets (e.g. if the site is particularly large, or surrounded by more than five "assets of the highest significance" set out in NPPF paragraph 200b).

[10] Historic England has published guidance on site selection methodology relating to heritage assets: The Historic Environment and Site Allocations in Local Plans (historicengland.org.uk)

1.20 Site selection (Stage 4 in this methodology) will reflect Step 5 of the HE guidance summarised above.

**Ecological impact**

1.21 An ecological assessment of each site will be carried out, as detailed in separate guidelines. A desk study based system will rapidly assess the impacts of potential development sites on known designated sites and other habitats and features of nature conservation importance. The desk study results are then validated by a site visit, which also seeks to identify any features of ecological interest that may have been missed throughout the desk study exercise.

1.22 For each site, a likely scale of adverse impact will be identified – either:

- "Minor adverse effect predicted (not significant)" where no features are present either within the site, or within 100m of the site. No known ecological reasons not to allocate the site. Minor adverse effects are likely to be mitigated with relative ease through the planning DM system.
- "Significant moderate adverse effect predicted" where features of regional and county value are present either within the site, or within 100m of the site. Potential to consider not allocating the site due to significant ecological effects, which may be able to be avoided by not allocating the site. Considerable on site avoidance and mitigation measures are likely to be required in order to ensure no impacts on the features present. Compensation may be required as a last resort. Potential to allocate the site with appropriate avoidance/mitigation conditions.
- "Significant major adverse effect predicted" where features of international and national value are present either within the site, or within 100m of the site. Sites in this category should only be allocated where it is proven that no suitable alternatives exist, and that suitable avoidance and mitigation measures could be implemented to ensure no residual impacts on the features affected. Compensation may be required as a last resort. Potential to allocate the site with appropriate avoidance/mitigation conditions.

1.23 Commentary will be provided to explain the scale of the impact.

**Accessibility assessment**

1.24 National policy states that significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. National policy also supports the use of local services. The Local Plan strategy reflects this national policy. Therefore, the assessment of sites considers access to the following community services and facilities along with employment sites:

- Train station
- Hourly or better bus route
- Primary school
- Secondary school
- Convenience store/shop
- Post Office
- Community hall

- Pub
- Open space/allotment
- Children's play area
- GP
- Employment site (identified in Employment Land Review)

1.25 The site assessment should note the distance to each of these 12 services, facilities and employment sites using information from the HELAA, setting out how many are within 1,600m of the site. This distance represents a 20 minute walk, consistent with the "20 minute neighbourhood" concept being promoted in the Local Plan. As the distances are calculated "as the crow flies", any physical barriers (e.g. roads, railway lines, built form, topography) should be noted where they would significantly increase the distance for walkers and cyclists.

**Other known site constraints**

1.26 There are a variety of other factors that are important to consider when assessing sites for potential development. This aspect of the site assessment will record the following other known site constraints:

- Best and most versatile agricultural land
- Noise
- Flood risk
- Water quality
- Minerals and waste impact
- Physical constraints e.g. topography, contamination, adjacent uses
- Loss of important land use e.g. open space, employment site, community facility
- Planning history – highlight issues raised in determined planning applications, planning appeals and/or preparation of the Local Plan 2013-31 that are relevant to the site.

1.27 Clearly, sites will be affected by these constraints to a greater or lesser degree, so constraints will only be identified where relevant to the particular site.

**Site opportunities**

1.28 Some sites may offer particular opportunities if they are developed, which should be noted in the assessment – such opportunities could include:

- Redeveloping previously developed land
- Potential to deliver higher than average densities (e.g. in close proximity to town centres and other locations well served by public transport)
- Connections into adjacent walking/cycling links and/or green infrastructure networks
- Delivering or contributing to infrastructure that could have wider benefits e.g. school, open space, other community facilities and services
- Continue existing street scene along site frontage

1.29 This section of the assessment will also identify opportunities to reduce the site size to make it more acceptable to develop. This will be relevant for sites where some parts may be unacceptable to develop, but the remaining parts are relatively unconstrained.

**Requirement for further work**

1.30 The initial assessment may highlight further work that will need to be undertaken, such as a more detailed landscape assessment or in response to evidence that is under production at the time of the assessment (such as the Strategic Flood Risk Assessment).

**Yield adjustment**

1.31 The yield shown at the start of the site assessment is calculated using the standard HEELA methodology[11]. Site appraisal work may indicate that this should be reduced, for example to take account of landscape, ecological or historic environment features; or to achieve a higher yield in particularly accessible locations. Where this is the case the yield will be adjusted to ensure that the local plan reflects a realistic site potential, and commentary will highlight parts of the site that are not acceptable to develop.

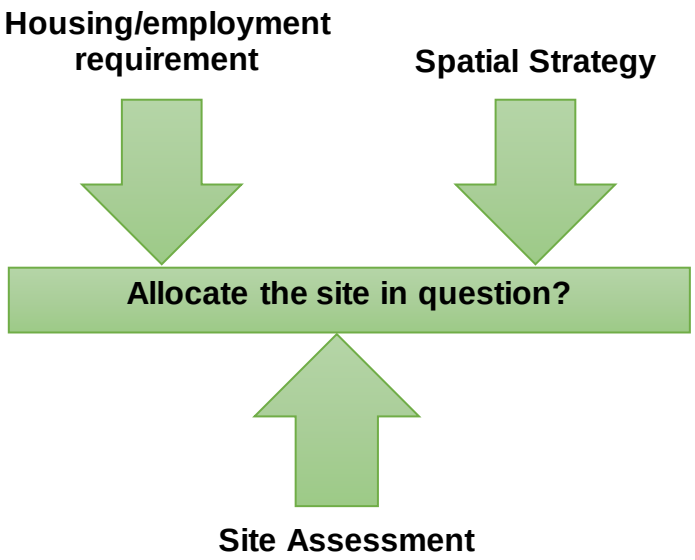
**Summary conclusions**

1.32 This section provides a brief summary of the key positives and negatives of each site.

**Stage 4: Site Selection**

1.33 When all sites have been assessed, Stage 4 considers which sites to allocate. The site selection process balances top-down strategic issues relating to the Local Plan district-wide housing requirement and spatial strategy for the distribution of development, with the specific factors in the site assessments – this process is summarised in figure 3 below.

**Figure 3: Site selection process**




1.34 The following text explains how these three factors will inform the selection of sites.

**Housing/employment requirement**

[11] Housing and Economic Land Availability Assessment - East Devon

1.35 The Local Plan district-wide housing requirement is 918 dwellings per year. The 20 year plan period (2020 – 2040) of the Local Plan means a total requirement for 18,360 dwellings. The Local Plan incorporates supply flexibility of 10% above the requirement, meaning the Local Plan proposes a total of 20,200 dwellings across East Devon.

1.36 The Local Plan reflects national policy in stating that at least 10% of the housing requirement should be accommodated on sites no larger than one hectare.

1.37 Therefore, the site selection process must ensure sufficient homes are allocated to meet the requirement (minus any windfall allowance); alongside identifying at least 10% of the requirement on sites that are one hectare or smaller.

1.38 An Economic Development Needs Assessment is being prepared to justify the level of employment land that is required over the plan period – when complete, this methodology will be updated to include reference to this evidence. Therefore, as with housing, sufficient land should be allocated to meet the employment land requirement (minus any windfall allowance).

**Local Plan spatial strategy**

1.39 The Local Plan directs development towards the most sustainable locations in East Devon, consistent with a spatial strategy to:

- Focus new development on the western side of East Devon, including a new settlement and other major strategic development close to Exeter
- Promote significant development at the Principal Centre of Exmouth and the Main Centres of Axminster, Honiton, Ottery St Mary, Seaton, and Sidmouth to serve their own needs and that of wider surrounding areas
- Support development at the Local Centres of Broadclyst, Budleigh Salterton, Colyton, Lympstone, and Woodbury that meets local needs and those in the immediate surrounds
- Allow limited development to meet local needs at the Service Villages of Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill, Whimple.
- Settlements not listed above are considered to be 'open countryside' for the purposes of the Local Plan, where more restrictive planning policies apply.

1.40 The site selection process should reflect this spatial strategy when considering whether to allocate the site in question, to ensure an appropriate level of development is proposed at each settlement.

1.41 Consistent with the spatial strategy, and to ensure a more nuanced approach, site selection should also consider the availability of jobs, community facilities and services at the settlement in question.[12] This promotes sustainable development by linking growth to the availability of jobs and services in the settlement, which may vary slightly despite being within the same defined 'tier' as other settlements, and therefore subject to the same overarching strategy set out above. For example, Seaton and Honiton are both identified as 'Main Centres', and proposed to have moderate levels of development. However, Seaton has fewer jobs, lacks some strategic facilities (train

[12] As set out in The Role and Function of Settlements, available at 1a. Role and Function of Settlements_report_v3_final draft for SPC.pdf (eastdevon.gov.uk)

station, secondary school, swimming pool), and is located in a less accessible location. Therefore, the spatial strategy should direct less development to Seaton than Honiton.

1.42 As the Local Plan period began in 2020, dwelling completions or commitments from this year until the base date of the Site Selection report should be included when considering the spatial strategy. There may be settlements where high levels of completions or commitments means that lower levels of 'new' housing are appropriate to ensure consistency with the Local Plan spatial strategy.

1.43 This section will also highlight key messages contained in the neighbourhood plan, if there one 'made' in the area.

**Site assessment**

1.44 Stage 3 assesses each site against a series of criteria that considered key planning issues. The site assessment ensures a consistent level of information is available for each site, meaning they can be compared against other sites at the same settlement (or options for freestanding new settlements can be compared with each other) to inform site selection.

**Conclusion**

1.45 The three overriding factors – housing/employment requirement, spatial strategy, and site assessment – should be considered together when deciding which sites to select for allocation in the Local Plan. Site selection will reflect the NPPF paragraph 175 by allocating land with least environmental or amenity value, where consistent with other policies in the NPPF.

1.46 The Site Selection form explains whether the site should be allocated, or not, with reasons why, based upon the housing requirement, spatial strategy and site assessment. It follows that sites that perform well against these three interlinking factors should be allocated for development; whilst sites that do not perform as well as other site options should not be selected for allocation.

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**Appendix One: Site Assessment and Selection Form**

<table>
<tr><th colspan="5">Site Details</th></tr>
<tr><td>Settlement</td><td></td><td>Tier</td><td></td><td rowspan="4">Map</td></tr>
<tr><td>Site ref.</td><td></td><td>Size (ha)</td><td></td></tr>
<tr><td>Proposed use</td><td></td><td>Yield[13]</td><td></td></tr>
<tr><td>Address</td><td colspan="3"></td></tr>
</table>

[13] This is the 'standard' yield calculated using the HELAA methodology

| Stage 3 - Site Assessment form | |
|---|---|
| **Site selection criteria** | **Guidance for the Assessment** |
| Sustainability Appraisal findings | • Identify 'major positive' or 'major negative' effects from the SA.<br>• Full details will be available in the SA report that accompanies the Local Plan. |
| Infrastructure implications | • HELAA DCC Education comments<br>• HELAA DCC Highway comments<br>• Other known infrastructure issues e.g. flood risk, sport and recreation, community facilities, healthcare, and utilities (including overhead power lines, and whether any HSE major hazard pipelines zones pass through the site); and the Infrastructure Delivery Plan 2017 |
| Landscape sensitivity | • Summarise findings from landscape sensitivity assessment methodology.<br>• Identify sensitivity rating of: high; high/medium; medium; medium/low; or low. |
| Impact on historic environment | • Summarise findings from Historic Environment Site Assessment.<br>• Identify impact as major; moderate; minor; beneficial; no change. |
| Ecological impact | • Summarise separate ecological assessment.<br>• Identify minor adverse effect; significant moderate adverse effect; or significant major adverse effect. |
| Accessibility assessment | • From the HELAA spreadsheet, identify the number of services, facilities and employment sites within 1,600m of the site.<br>• Add commentary about accessibility by sustainable travel. |
| Other known site constraints | • Best and most versatile agricultural land<br>• Noise<br>• Flood risk<br>• Water quality (in ecological assessment and/or Water Cycle Study)<br>• Minerals and waste impact<br>• Physical constraints e.g. topography, contamination, adjacent uses<br>• Loss of important land use e.g. open space, employment site, community facility<br>• Planning history – highlight issues raised in determined planning applications, planning appeals and/or preparation of the Local Plan 2013-31 that are relevant to the site. |
| Site opportunities | • Redeveloping previously developed land<br>• Deliver higher than average densities<br>• Walking/cycling/Green Infrastructure connections<br>• Infrastructure benefits<br>• Continue existing street scene along site frontage<br>• Potential to break down site in to smaller, more acceptable site |
| Further work required? | • State Yes or No.<br>• Highlight if additional evidence is required to help with the site assessment. |

| Stage 3 - Site Assessment form | |
|---|---|
| **Site selection criteria** | **Guidance for the Assessment** |
| Amend yield to reflect site assessment? | • State Yes or No.<br>• Based upon the site assessment findings, should the 'standard' yield be amended e.g. reduced to take account of landscape, ecology, or historic environment; or increased in a particularly accessible location?<br>• If Yes, identify parts of site that not acceptable, and insert amended yield. |
| Summary conclusions | • Brief summary of the key positives and negatives of the site. |

| Stage 4 - Site Selection form | |
|---|---|
| Less than 1 ha? | Yes or No |
| Number of completions/commitments 01/04/2020 – 01/04/2022 (by settlement) | Insert |
| Contribution to spatial strategy | Consider contribution of site to spatial strategy:<br>• Is it the only potential site in a settlement?<br>• Are there better alternative sites in the settlement?<br>• Would allocating the site be consistent with the spatial strategy? |
| Should the site be allocated? | Yes or No |
| Reasons for allocating or not allocating | Reference:<br>• Meeting housing/employment requirement<br>• Meeting 10% of requirement on sites of less than one hectare<br>• Contribution to spatial strategy<br>• Stage 3 summary conclusions |
| If the site as a whole is not considered suitable for allocation, could a smaller part of the site be allocated? | Yes or No<br>If 'yes' insert map to show land considered suitable for allocation. |