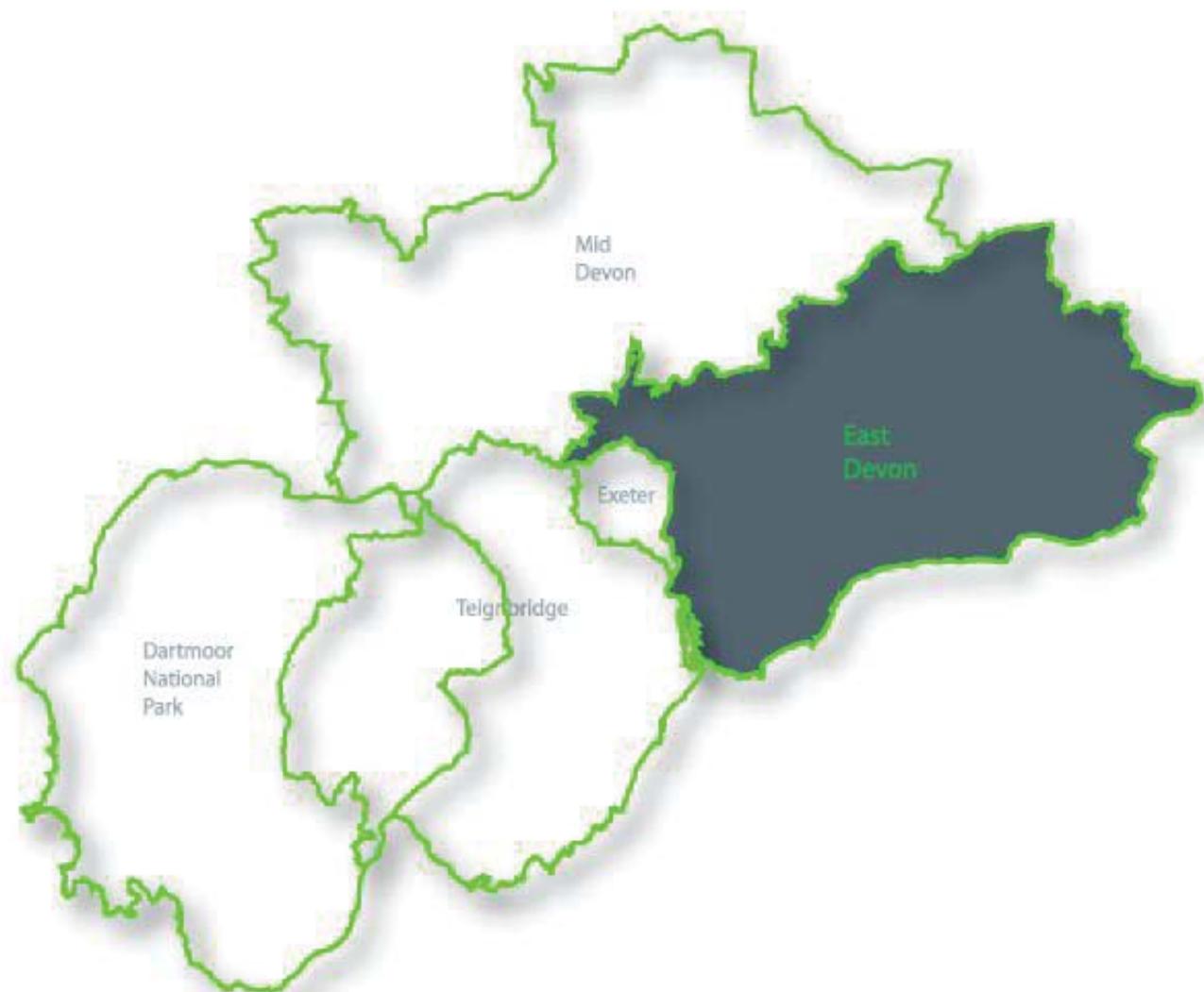


Strategic Housing Land Availability Assessment

April 2010



East Devon District Council



Working in partnership across the Exeter Housing Market Area

Executive Summary

A Strategic Housing Land Availability Assessment (SHLAA) is a key part of a local planning authority's evidence base on housing delivery. It aims to identify sites with potential for housing and assess when they could be developed. The assessment, which is undertaken with the help of an independent Panel, helps a local planning authority prepare planning documents that are a part of the process of delivering sufficient land to meet the housing needed by local communities.

The East Devon SHLAA report presents an analysis of the potential dwelling contribution of sites within the District, from both within and outside the planning process, over 1 to 5, 6 to 10 and 11 to 15 year time periods. Monitoring will take place through the Annual Monitoring Report, which compares the delivery of housing and the five-year supply of deliverable sites with the expected annual levels of housing completions identified in strategic planning policies.

The SHLAA does not make judgements on whether sites should be allocated for housing or whether planning permission is likely to be granted. The SHLAA will help to identify the most developable and deliverable sites for housing development. Any housing allocations will be dealt with through development plan documents following wide ranging consultation.

The results of the East Devon SHLAA show that none of the deliverable dwellings are at Cranbrook or at strategic large scale sites that fall inside/at what is interpreted to be the RSS Area of Search 4B area. They are, therefore, all deemed to be in/at the RSS definition of the 'Rest of East Devon'. The five year future year assessment indicates a total requirement for 1,379 dwellings in the rest of East Devon and 3,382 dwellings at Cranbrook and in Area of Search 4B (combined). The deliverable dwelling figure for the Rest of East Devon the deliverable figure exceeds the RSS five year requirement. Further work is required to consider how the identified constraints on strategic sites in the west end can be overcome to aid strategic housing delivery.

In spatial terms the SHLAA shows substantial amounts of developable land around the towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Seaton and Sidmouth (although in the case of Exmouth this is relatively small in relation to the scale of the town). Further work is required in Exmouth to explore the potential developability of additional sites in order to improve the choice of strategic options for any expansion of the settlement.

The anticipated levels of development at Cranbrook of 4650 dwellings by 2025/26 are well below the 7,500 for an expanded Cranbrook set out in the RSS. However, this reflects a delayed start date as advised by the Panel and a build out rate that could be considered conservative for a new settlement. This will be reviewed when the Section 106 Agreement is signed.

A large proportion of the developable land identified lies outside of the 'West End' Parishes and the seven main towns. Such sites do not comply with current local plan policy and some of the sites included in these figures are excessively large in relation to the neighbouring settlements (if any). Caution should be used in making assumptions about how much of this land is likely to be suitable for development and come forward through the planning process. However, initial analysis indicates that there is a good supply of potentially developable land that is well related to existing rural settlements to meet future needs.

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1 Introduction

What is a SHLAA?

1.1 Strategic housing land availability assessments (SHLAAs) were introduced in national planning guidance and are key components in the process of housing delivery. A SHLAA is a strategic assessment of the housing potential of specific brownfield and greenfield sites. SHLAAs are undertaken in partnership with key stakeholders in the housing field, and require regular monitoring and updating.

1.2 Planning Policy Statement 3: *Housing* (PPS3)¹ advises (paragraph 54) that local planning authorities (LPAs), drawing on evidence from SHLAAs and other relevant evidence, should identify sufficient specific sites to deliver the housing needed in the first five years of the plan period. A LPA should:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development, and to keep this topped up in response to market information;
- Identify specific, developable sites for years 6 - 10 and ideally years 11-15.

The guidance goes on to say that where it is not possible to identify specific sites for years 11-15 of the plan, then broad locations for future growth should be identified.

1.3 To add detail to the advice on housing delivery in PPS3, the Government published SHLAA Practice Guidance² ('CLG Guidance') in July 2007. The Planning Officers Society prepared further guidance on how best to coordinate the preparation of SHLAAs with the DPD preparation process. This guidance was published by the Planning Advisory Service ('PAS Guidance') in January 2008 and updated in July 2008³.

1.4 As part of the planned provision of housing, SHLAAs should be brought into the process of preparing development plan documents (DPDs). They are an important part of the evidence base and their robustness may be subject to scrutiny during the public examination of the relevant DPD. CLG Guidance notes that when the standard methodology is followed there should not be a need for a local planning authority to justify the approach taken in preparing its SHLAA, including at independent examination.

¹ Communities and Local Government (CLG) (November 2006) *Planning Policy Statement 3(PPS3): Housing*

² DCLG (July 2007) *Strategic Housing Land availability Assessments – Practice Guidance*

³ Improvement and Development Agency (I&DeA) & Planning Advisory Service (PAS) (January & July 2008) *Strategic Housing Land Availability and Development Plan Preparation*.

1.5 This SHLAA report covering East Devon will be used in the preparation of the Local Development Framework Core Strategy which will set a spatial strategy and strategic housing allocations.

1.6 The *South West Regional Housing Strategy 2005 - 2016* sets out indicative boundaries for 14 sub-regional housing market areas (HMAs) in the region, and the HMAs were translated into the nearest equivalent district authority boundaries for practical purposes. Joint working across the whole of an HMA to assess levels and types of housing is seen as essential. *Strategic Housing Market Assessments* (SHMAs) provide evidence of the level and type of need in a sub-regional housing market area.

1.7 East Devon is in the Exeter HMA, which also includes Exeter, Mid Devon, Dartmoor National Park and Teignbridge local planning areas. The SHMA Report for Exeter HMA was published in 2007.

Approach and methodology

1.8 The LPA partners in the Exeter HMA have worked together to develop a SHLAA methodology and draw up a constitution and terms of reference for a SHLAA Panel. That methodology is firmly based on the advice set out in the practice guidance referred to earlier (see paragraph 1.3).

1.9 The methodology and Panel terms of reference were subject to public consultation and the final documents were published in September 2008. The methodology applies to sites throughout East Devon. The methodology (including the Panel constitution and Terms of Reference) is on the East Devon website.

1.19 Government guidance advises that SHLAAs should be updated regularly as part of the Annual Monitoring Report exercise to support the updating of the housing trajectory and the five year supply of deliverable sites.

1.11 The Council has conducted a review of its SHLAA in accordance with the Government guidance. This review has been carried out in conjunction with the SHLAA Panel of Stakeholders. Further details of what the review has involved are included in this report.

Non-residential Uses

1.12 The SHLAA does not report on potential sites which may be available for non-residential uses e.g. employment.

2 The purpose and content of the assessment

Purpose and minimum requirements of a SHLAA

2.1 The SHLAA serves two primary purposes:

- It identifies suitable sites with potential for housing; assesses that potential and estimates when sites are likely to be developed.
- It assesses the 5 year supply of deliverable housing sites for the purpose of *National Indicator 159: Supply of ready to develop housing sites*.⁴

The report is a technical study that will be used as part of the evidence base in the process of plan making.

2.2 The Practice Guidance sets out the minimum requirements of SHLAAs.

They are required to:

- Provide lists of sites, cross-referenced to maps showing locations and boundaries of specific sites (or broad locations where necessary);
- Assess the deliverability / developability of each identified site (i.e. in terms of its suitability, achievability and availability) to show when sites could realistically be expected to be developed;
- Assess the potential quantity of housing that could be delivered on each identified site (or within each identified broad location) or on windfall sites (where justified);
- Identify the constraints to delivery on individual sites; and
- Make recommendations on how and when any constraints could be overcome.

Deliverable and developable sites

2.3 PPS3 provides a definition of **deliverable** sites. At the point of adoption of the local development document, deliverable sites are those that are:

- **available** - at that time
- **suitable** - in a location where development would contribute to a sustainable mixed community
- **achievable** - where there is a reasonable prospect that housing will be delivered on the site within five years.

Part of the SHLAA process is the assessment of sites to determine whether they are deliverable within the five year horizon. CLG have published guidance *Demonstrating a 5-Year Supply of Deliverable Sites*, which is on the Planning Inspectorate website.⁵ It is the intention that eventually

⁴ DCLG (October 2007) The New Performance Framework for Local Authorities and Local Authority Partnerships: Single Set of National Indicators

⁵ http://www.planning-inspectorate.gov.uk/pins/advice_for_insp/advice_produced_by_dclg.htm

the SHLAA report and the annual review will provide the evidence for demonstrating the five year supply.

2.4 Looking beyond the five year deliverable sites, there will be sites considered to be potentially **developable** in the 15 year planning period. PPS3 defines those sites as ‘in a suitable location for housing development and there should be a reasonable prospect that the site is available for and could be developed at the point envisaged’ (s56).

Monitoring and review

2.5 The SHLAA will be updated on an annual basis, with the updating programmed so that it can inform the LDF *Annual Monitoring Report*, which is published at the end of the calendar year. However, a full resurvey (or ‘call for sites’) should not be needed every year. Sites that are brought to the attention of the Authority over the course of year will be assessed, along with a further appraisal of sites formerly dismissed to see if the constraints have changed. In particular the review will need to take account of whether the Section 106 for Cranbrook has been signed and any clarification on the timescale for major infrastructure improvements East of Exeter that could justify moving sites dependent on these forward from the 11-15 year timeband.

Status of SHLAA report and identified sites

2.6 At its meeting on 30th March 2010 the SHLAA Panel endorsed the East Devon SHLAA April 2010 as being representative of the advice provided to the Council by key stakeholders. This endorsement provides a basis for the Council to publish the SHLAA report as a technical evidence base document to inform the preparation of the East Devon SHLAA.

Planning Status of Identified Potential Sites

2.7 The following points are made to provide clarity about the status of potential sites identified within the SHLAA. This helps to avoid confusion and misunderstanding.

- The SHLAA does not pre-empt future plan making or related decisions.
- The SHLAA is not Development Plan policy.
- The SHLAA is not informal Council policy.
- The SHLAA is technical evidence. It is only one piece of evidence in the LDF evidence base.
- The SHLAA does not prejudge the relative suitability of sites for development or rank them in order of preference.
- Identified sites may be further tested through the plan making process for Development Plan Documents where judgments will be made about whether sites should be allocated through plan policy. This will include rigorous testing through sustainability appraisal/strategic environmental assessment, habitats regulation assessment, stages of public participation and independent examination.
- The SHLAA does not indicate that planning permission will be granted for new housing.
- Planning applications on sites identified in the SHLAA report will be judged on their merits against relevant development plan policies unless material consideration indicate

otherwise. The SHLAA report may be a material consideration in the determination of such planning proposals.

- The SHLAA does not preclude sites being developed for other suitable uses.
- The SHLAA does not preclude other sites that have not been identified in the SHLAA being developed for housing.

3 Involvement of Stakeholders in the SHLAA

Joint Methodology for the Exeter Housing Market Area

3.1 Following the publication of the Practice Guidance the local authorities in the Exeter Housing Market Area Sub-Region established a steering group comprising of officers from each authority. The steering group has been responsible for the preparation of the joint SHLAA Methodology. The methodology passed through various draft stages, which included a public consultation stage, and was finalised in September 2008. The methodology comprises ten stages:

1. Planning the assessment;
2. Determining which sources of sites will be included in the Assessment;
3. Desktop review of existing information;
4. Determining which sites and areas will be surveyed;
5. Carrying out the survey;
6. Estimating the housing potential of each site;
7. Assessing when and whether sites are likely to be developed. There are four sub-stages: (7a) assessing suitability for housing, (7b) assessing availability for housing, (7c) Assessing achievability for housing, (7d) overcoming constraints;
8. Review of the assessment;
9. Identifying and assessing the housing potential of broad locations (where necessary);
10. Determining the housing potential of windfall (where justified).

3.2 In order to produce robust and reliable assessments, the Government advises that the assessments be prepared in collaboration with stakeholders in the housing sector. Where housing market areas cover more than a single authority's area, the relevant authorities are advised to work in partnership to prepare joint assessments or use a consistent methodology. A joint methodology has been prepared and used by partners in the Exeter HMA. As the partner authorities are at different stages in their plan preparation programmes, it has not been possible to prepare a joint assessment.

The SHLAA Panel

3.3 During the process of developing the SHLAA Methodology the steering group established a Panel of housing stakeholders. The members of the Panel act on a voluntary basis. The Panel is shared by the authorities in the Exeter Housing Market Area, although there are a couple of members who sit only on the East Devon Panel to reflect geographic interests. Although the membership of the Panel has changed over time, there has been a good degree of continuity. This has led to increasing confidence and consistency in the application of the methodology to individual SHLAAs. Panel members have also provided detailed advice on the current condition of the housing market, and contributed generally to the work of the local authorities in the Exeter Housing Market Area. The role and responsibilities of the Panel are explained in further detail in the 2008 *Methodology* and the accompanying *Panel Constitution* and *Terms of Reference*.

SHLAA Panel membership

3.4 Invitations for membership of the Panel went out to a wide range of large, medium sized and small house building companies, architects, estate agents, and planning consultants and a representative local Panel was established. The Panel also includes a range of statutory agencies, such as the Environment Agency, Highway Authority, Highways Agency, and Natural England. The local community is represented, in the case of East Devon, by East Devon District Council's Rural Champion (an elected Member). The composition of the Panel that conducted the assessment of sites in East Devon is set out in Appendix 1. Panel members are required to make declarations of interest where any personal, financial or prejudicial interests apply.

3.5 Given their combined development industry experience, Panel members have played a key role in the preparation of this SHLAA by assessing whether specific sites are deliverable and developable for residential development. In accordance with the Practice Guidance, the Panel's advice has been informed by factors including:

- The current housing market conditions and predictions for future market performance;
- Site preparation costs, bearing in mind physical constraints identified in the assessment of suitability and during any site visits that members of the Panel may have made; and
- Development costs related to existing and emerging policy including affordable housing provision, infrastructure requirements and Code for Sustainable Homes.

3.6 Residential valuation models have not been applied to examine site viability due to the large number of sites identified by the assessment.

3.7 Panel meetings were held in May, September, October and December 2009 and February 2010 to consider the East Devon SHLAA.

4 The Planning Background

National planning policy

4.1 *The Planning and Compulsory Purchase Act 2004* introduced major changes to the way the planning policy system works, replacing the former system of county level structure plans and local authority level local plans with regional spatial strategies and local authority level local development frameworks. The legislation also defines the overall aim of spatial planning, which is to help further the aims of sustainable development.

Regional planning policy

4.3 The draft RSS was published for public consultation in June 2006. An Independent Panel held an Examination in Public on the draft RSS between April and July 2007. Their report setting out recommendations for change was published in January 2008. The Secretary of State considered the Panel report and published proposed changes to the draft RSS for further consultation in July 2008. Approval of the RSS by the Secretary of State was expected in July 2009. However, this has been delayed following legal concerns about process raised by the successful High Court challenge of the East of England RSS. On 25 September 2009, the Government gave the go ahead for a further appraisal additional areas of search introduced by the Secretary of State for the RSS are the most sustainable way forward for the Region, with reporting in the early part of 2010. While the final RSS has yet to be published, the Government has indicated that 'great weight' should be given to the policies contained in the draft RSS.

Local Planning Policy

4.4 The East Devon Local Plan was adopted in July 2006 and work is underway on the Local Development Framework Core Strategy that will set out the strategic directions for growth and strategic housing allocations to 2026. An 'Issues and Options' consultation for the Core Strategy was undertaken during the Winter/Spring of 2009 and work is progressing towards a submission document late in 2010 or early 2011.

East Devon's Strategic Housing Requirements

4.5 The Secretary of State's Proposed changes to the draft RSS set out an overall requirement of 17,100 dwellings for East Devon for the period 2006 to 2026. Of this overall figure the RSS requires that 7,500 are accommodated in an expanded Cranbrook, 4,000 are in the area of search 4B (defined in the RSS as broadly to the east of Exeter), leaving 5,600 to be found in the rest of East Devon (i.e.Outside of the Area of Search 4B and Cranbrook).

5 Condition of the housing market

Government advice

5.1 CLG Guidance notes that the effect of market conditions on economic viability should be taken into account in assessing the deliverability and developability of potential housing sites to produce a realistic and reliable assessment.

5.2 As elsewhere in Britain, the South West region's economy is affected by global and national economic crises. For the housing industry this means a lowering of consumer confidence, difficult access to funding, and lower outputs and turnover. In April 2008, the Regional Economic Profile⁶ painted a grim picture of the housing industry in the SW region. There had been a rapid decline in the number of properties started in the second half of 2008. The fall in new house building projects was expected to have knock-on effects for activity in related industries; such as construction and property-related services. In the baseline recession scenarios for the South West⁷ the construction sector was predicted to experience annual growth in 2009 of -6.1%, the lowest of all broad business sectors and lower than the UK forecast of -1.9%.

5.3 However, in October 2009 the South West RDA⁸ saw some reasons for a degree of optimism. The region's housing market appears to be showing some signs of stabilisation and possibly recovery. Although transactions are still at low levels, they have moved off the bottom and prices appear to have stopped falling. However, it noted that reposessions were still climbing, house building remained very subdued and that the recovery was likely to be weak, volatile and protracted.

5.4 The Panel has taken the current housing market factors into account in coming to their decisions on the developability and deliverability of housing, which is reflected in their conclusions. The Panel has also provided some general advice on how the current market conditions should be reflected in the delivery of housing in the sub-region. This advice relates to the adjustment of build out rates on sites where development has and has not started, and is further moderated by the size of the development - less than 15 dwellings and 15 dwellings or more. (APPENDIX 2)

5.5 The Panel members have recently offered the Exeter HMA local authorities some further advice on the current market:

- In the current economic climate, developers will be running down land banks, but looking for opportunities to have a quick turn around on smaller sites.

⁶ South West RDA (April 2009) *Regional Economic Profile No. 7*

⁷ Experian (for South West RDA) (January 2009) *Recession Scenarios: Impact on SWE Sectors and Places Final Report*

⁸ South West RDA (October 2009) *Regional Economic Profile No. 8*

- Large sites will probably not be brought forward and there may be pressure to sub-divide them.
- The mix of affordable and open market housing needs to be carefully assessed; too high a proportion of affordable housing may make a development unviable, but a fully funded affordable housing development can front load a mixed tenure development.

5.6 Market conditions will change over time as confidence and optimism in the economy generally and the housing market in particular ebb and flow. It will be particularly important therefore that the housing market statement is updated along with each review of the SHLAA.

6 The Scope of the Assessment

Stage 1: Planning the assessment

6.1 The agreed methodology for the Exeter Housing Market Area sets out locations considered to be unsuitable for development, including Sites of Special Scientific Interest, Flood Zone 3b and development in locations unrelated to settlements defined through existing / emerging development plan policies that may not contribute towards the creation of sustainable, mixed communities (as defined through RSS or local policies). However, East Devon members have been concerned that all sites submitted by landowners/agents be fully assessed so in this assessment no sites have been discounted under 'Stage A' of the methodology. In view of the lack of a Core Strategy this approach is consistent with government advice that "Except for the more clear cut designations such as Sites of Special Scientific Interest, the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives" (Communities and Local Government SHLAA Practice Guidance paragraph 21). Once a Core Strategy for the Local Development Framework is in place it will be possible to filter out sites that do not comply with the strategy when the SHLAA is updated to inform the housing land supply figures. Meanwhile it is important to stress that inclusion of a site in the SHLAA does not indicate that it is likely to be acceptable for development in terms of planning policy.

6.2 Production of the East Devon SHLAA has followed earlier work in the Exeter HMA undertaken by Teignbridge District Council, Mid Devon District Council, Dartmoor National Park and Exeter City Council. The work, including all site visits, technical assessments and the production of information material, was undertaken in-house. There has been a commendable practice of Panel members undertaking their own site visits, and that was also the case for the East Devon SHLAA.

Stage 2 – Determining which sources of sites should be included in the assessment

6.3 The CLG Guidance provides information on the sources of sites with potential for housing. The sources comprise sites already in the planning process and those that are outside. They include:

Sites in the planning process;

- Sites with unimplemented / outstanding planning permissions for housing;
- Housing sites where construction has commenced;
- Existing housing allocations and site development briefs;
- Land allocated (or with permission) for employment or other land uses that are no longer required for those uses; and

- **Sites not currently in the planning process;**
- Vacant and derelict land and buildings;
- Surplus public sector land;
- Land in non-residential use that may be suitable for re-development for housing, such as commercial buildings or car parks, including as part of mixed use development;
- Additional housing opportunities in established residential areas, such as underused garage blocks;
- Sites in rural settlements and rural exceptions sites;
- Urban extensions;
- Large scale redevelopment and redesign of existing residential areas.

Stage 3: Desktop review of existing information

6.4 Stage 3 of the methodology involved a desktop review of all the sources of sites outlined in paragraph 6.3. The review was coupled with a 'call for sites' exercise, which provided an opportunity for the public, landowners and other bodies to submit any potential housing sites for consideration in the SHLAA. A 'call for sites' press release went out to the local press in June 2008 inviting submissions. In the same month letters inviting submissions were also sent to those on the local plan database.

6.5 Site information from this work and the call for sites exercise was recorded and assessed in the manner set out in the Exeter HMA Methodology. The information was collated for consideration by members of the SHLAA Panel.

Site size threshold

6.6 To manage the SHLAA process effectively, a minimum site size threshold of five dwellings or 0.15 ha has been applied throughout the planning area. Sites which have been considered and found by the Panel to yield less than 5 have been discounted from the yields given.

6.8 Paragraph 5 of the Practice Guidance indicates that the SHLAA report should not include an allowance for windfalls in the first 10 years of the development plan, unless there are justifiable local circumstances that prevent specific sites being identified. However, when a windfall site comes forward and planning permission is granted it may be included in the housing supply. Rather than assess all sites with planning permission individually the SHLAA Panel has recommended that a model approach is taken to discounting sites with planning permission (Appendix 2). This has been applied to existing planning permissions for the 5 year housing supply figures and the housing trajectory. No future windfall contribution has been attributed to years 6 to 10 or 11 to 15.

Stage 4: Determining which sites and areas will be surveyed

6.9 All sites in East Devon, except those falling below the 0.15 ha size threshold were assessed through the SHLAA process for the reasons set out in paragraph 6.1.

Stage 5: Carrying out the survey

6.10 Completing the appraisal for individual sites involved undertaking a variety of technical investigations and site surveys. A great deal of information on heritage characteristics, biodiversity, land use, flood risk etc. is accessible on the Authority's geographic information system (GIS). Site characteristics recorded included site size, site boundaries, current uses and physical constraints (e.g. slope, access, flood risk, natural, archaeological and historic features).

Stage 6: Estimating the housing potential of the site

6.13 To estimate the housing potential of sites, the Methodology applies 'gross to net developable area ratios' and 'density standards across the housing sub-region. The standards are set out below:

Table 1: Gross to Net Development Ratio

<u>Site size</u>	<u>Gross to net ratio standards</u>
Up to 0.4 ha	100%
0.4 – 2 ha	80%
Over 2 ha	60%

The ratios take into account the proportion of the total site area needed to provide roads, pavements and other services and facilities.

6.14 **Density standards** are applied to the net developable area of each site.

For the majority of sites in East Devon, those set out in the SHLAA Methodology for 'suburban / rural settlement' types of development are used. The figures are 30 to 50 dwellings per hectare, which are set out in the tables as minimum and maximum yields for each site. The exception to this approach is sites in town centres where the town centre figure to 100 is used. A mid point yield is also shown in the tabulations and is the figure used in the housing trajectory.

6.15 In order to apply appropriate annual levels of housing delivery to the SHLAA housing trajectory, annual '**build out**' **rates** must be applied to sites where development would take place over a number of years. The SHLAA Methodology sets out an agreed approach to build out rates for the Exeter HMA area. The rates may be moderated by market condition factors or other known circumstances that may affect housing completion rates. The rates applied are:

- Up to 25 dwellings - assumed to be completed in year 1;
- A maximum of 50 dwellings per year for a single developer;

- Sites up to 500 dwellings: assume a single developer completing no more than 50 dwellings per year.

In view of the housing market conditions these rates have effectively been halved for sites not currently in the planning system for the 1-5 year time band as recommended by the East Devon SHLAA Panel and set out in **APPENDIX 2**. The development factors set out in Appendix 2, which reflect the current depressed market conditions, will also be applied to the assumed completion rates in relation to the 5 year supply of deliverable sites for housing.

6.16 In the case of **Cranbrook** higher build out rates have been applied to reflect the number of developers that are likely to be involved in the new settlement. Some Panel members, drawing from experience of new settlements elsewhere, felt that the build out rate for Cranbrook may build to 480 a year after 3 years. For the purpose of this assessment the build out rates for Cranbrook have been set at 100 in years 1 to 2, 200 for years 2 to 3, 300 for years 3 to 4 and 450 thereafter, although the start is not scheduled until the second time band (6-10 years) – to be reviewed when the Section 106 Agreement is signed.

Stage 7: Assessing when and whether sites are likely to be developed

6.17 PPS3 states that in order to be considered deliverable, sites should, at the point of adoption of the relevant DPD:

Be Available – the site is available now;

Be Suitable – the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities;

Be Achievable – there is a reasonable prospect that housing will be delivered on the site within five years. (Paragraph 54)

6.18 Assessing the suitability, availability and achievability of sites will provide the information that is needed to judge the deliverability and developability of those sites, within plan making contexts. CLG Guidance sets out the following criteria for those two important factors:

Deliverable – a site is available now, offers a suitable location for housing development and there is a reasonable prospect that housing will be delivered on the site within five years of adoption of the relevant DPD.

Developable – a site should be in a suitable location for housing development and there should be a reasonable prospect that it will be available for and could be developed at a specific point in time. The Guidance also notes that the assessment of deliverable and developable sites should be made irrespective of the level of housing provision that is actually needed over the plan period.

6.19 In considering developability, the Panel applied the following conventions.

For a site to be considered as ‘developable’ in the first 5 year SHLAA period:

(i) Planning permission for the development of the site or a planning application nearing approval must exist.

(ii) There must be no legal or ownership constraints (or lease or tenancy obligations) or other barriers that would compromise the availability of the site.

(iii) The site should either be controlled by a housing developer, a land owner who has expressed an intention to sell, or be owned by a public body (e.g. parish council, district council) willing to see the site developed.

(iv) A brownfield site with the potential to make a contribution to housing delivery during the 5 year period.

Sites that did not have planning permission or were not compliant with existing local plan policy were not considered deliverable until the 6-10 year SHLAA period or, if there appeared to be significant constraints on delivery, the 11-15 year period. The Panel agreed that this approach was particularly relevant in the light of the current depressed housing market. In the case of sites in the settlements of **Ottery St. Mary, West Hill and Tipton St. John** where major investment is required to provide sewerage capacity all sites found to be developable have been put in the 11-15 year period. Major sites to the **east of Exeter** which the Panel considered to be dependent on major public infrastructure investment were also placed in the 11-15 year period and it will be important to review these judgements as the situation is clarified.

Stage 7a – Assessing suitability for housing

6.20 CLG Guidance states a site is suitable for housing if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities. It goes on to say that sites allocated in existing plans and those with an extant planning permission will generally be suitable, subject to any changes in circumstances. For other sites it lists a range of factors to be considered in assessing a site's suitability:

- Policy restrictions;
- Physical problems or limitations;
- Potential impacts;
- Environmental conditions.

6.21 The SHLAA Methodology expands those factors, applying a two stage approach to assessing the suitability of a site. Stage A consists in assessing sites against a range of strategic considerations. If a site fails at Stage A, it is deemed to be in an unsuitable location for housing development and does not proceed to the more detailed stage B assessment. However, for the reasons set out in paragraph 6.1 no sites were discounted at Stage A in East Devon.

6.22 A Stage B assessment consists of checking sites against a wider range of development factors. Those factors are:

- The potential for impact on biodiversity, the historic, built and cultural environments, landscape character, mineral resources, air quality, (water) Source Protection Zones, open space and recreation opportunities, employment land;
- Access to public transport, services and facilities;
- Highway access, pedestrian and cycle links;
- Land status;
- Constraints to delivery;
- Infrastructure capacity; and
- Compatibility with existing and / or proposed surrounding uses.

Sites that were considered to be suitable were then assessed against the ‘availability’ and ‘achievability’ criteria by the Panel. The professional expertise and experience of Panel members has added considerably to the thoroughness and rigour of the assessments.

Stage 7b - Assessing availability for housing

6.23 The SHLAA Methodology contains a site submission questionnaire. Part of the information that is sought includes asking landowners to indicate if the proposed site is available and when it may come forward. There may be legal or ownership problems, such as lease, tenancy or licence obligations, multiple ownerships, ransom strips that will affect availability, and it is important that those matters are known about when sites are considered. Where a site has not been confirmed as available it has been excluded on the grounds that it does not meet with the requirements set out in PPS3.

Stage 7c - Assessing achievability for housing

6.24 ‘Achievability’ is defined as whether there is a reasonable prospect that housing will be developed within specified time periods. This will be affected by market conditions, the costs associated with the development and the phasing of development schemes.

6.25 To help the Panel form its views on achievability, information has been provided on physical and community infrastructure requirements and other factors that need to be taken into account when considering sites. Achievability may also be affected by other problems identified such as multiple ownerships,

Stage 7d - Overcoming constraints

6.26 Where constraints to development on otherwise suitable sites have been identified, consideration has been given to how these might be overcome, such as mitigation measures, extending development time-scales or adjusting site envelopes to enable access problems or other spatial constraints to be overcome.

Stage 8: Review of the assessment

6.27 CLG Guidance notes that once the initial survey of sites and the assessment of their deliverability / developability have been made, the housing potential of all the sites should be shown as an indicative housing trajectory. At this stage, judgements may be made on whether sufficient sites to provide for at least the first ten years of housing development needed in the plan period have come forward, how quickly development is likely to proceed, and whether any more detailed analysis (by area or time of development) of the housing potential is needed. Any changes in housing market or development viability factors will need to be considered.

6.28 CLG Guidance points out that if there appear to be insufficient sites, then the shortfall be planned for, either by identifying broad locations for growth inside or outside settlements or using a windfall allowance.

6.29 PAS Guidance indicates that a SHLAA should function as an ongoing database, updated regularly. The Guidance goes on to state that where there are likely to be sufficient sites available, there is no need to update the study to assess further sites for consideration when preparing a site allocations DPD. Panel Members agreed that it should normally be possible to update the database without the need for a further comprehensive study.

Stage 9: Identifying and assessing the housing potential in broad locations (where necessary)

6.30 Broad locations are areas where housing development is considered feasible and will be encouraged, but where specific sites cannot yet be identified. It is a way of indicating to local communities about where future development will be pointed, and indicates to developers where development will be encouraged. PPS3: Housing and CLG Practice Guidance indicate that broad locations should be applied to years 11-15 of the trajectory if the SHLAA fails to indicate sufficient capacity for dwellings to meet the housing requirement. It is not considered necessary to consider broad locations at the current time.

Stage 10: Determining the housing potential of windfalls

6.32 Paragraph 59 of PPS3 states that '*an allowance for windfalls should only be made where it is not considered possible to allocate sufficient land to meet the requirement at least for the first five years [of the trajectory].*' Windfall sites are those not allocated for housing but which are likely to make a contribution towards housing supply.

6.33 In view of the above the Council is not in a position to demonstrate local circumstances to warrant making such a windfall allowance at this time. It should however be noted that on the basis of past completion rates windfall sites will continue to make a contribution towards housing requirements. Following a future review of the SHLAA it may be appropriate to make a windfall allowance.

7 Findings of the East Devon SHLAA

7.1 A total of 481 sites were considered as part of the SHLAA in addition to the application of the housing conditions model to existing planning permissions not yet started as set out in APPENDIX 2. The 'SHLAA' sites comprised mainly land put forward by interested parties as a result of the 'call for sites'. Other site sources included 'issues and options' submissions in response to consultation on the Core Strategy, local plan allocations and known brownfield sites. 11 submitted sites were under the size threshold and were not considered by the Panel and 3 were effectively duplicate sites.

7.2 The model approach for current market conditions agreed with the Panel has been applied to sites over 15 units with planning permission but not under construction and the results shown in Table 2.

Table 2 - Sites over 15 units with planning permission but not started

Address/ Reference	Commentary	Total Gross Potential Yield	Excluded/ Included for 5 Year Provision	Reason for Inclusion or Exclusion	Net Yield for 5 Years
Land Off Chard Road, Axminster, Devon (Local Plan Site AX009)	07/1635/MFUL grants permission for 87 dwellings on the westerly field of site AX009 (or the westerly field of the two fields that make up the southern part of Plot 75/0626.	87	Included	Site is understood to form part of developers ongoing development programme.	45
Stony Lane, Axminster	This site (the eastern part of AX009) forms part of the larger permission 75/0626. As at 2008 the site has an estimated capacity of 60 to 70 dwellings.	60	Excluded	Site is not liable to be started until site above is built/commenced.	0
Land At Dukes Way, Axminster, Devon	This site forms roughly half of Local Plan allocated site - AX002. At 2008 an application was expected for the other part for approximately 60	41	Excluded	It is not clear if development at this site will proceed or how quickly. Erring on the side of caution this site	0

Address/ Reference	Commentary	Total Gross Potential Yield	Excluded/ Included for 5 Year Provision	Reason for Inclusion or Exclusion	Net Yield for 5 Years
	dwellings.			has been excluded.	
88-92 Salterton Road, Exmouth, Devon, EX8 2NN	Erection of 2no two and a half storey linked buildings comprising 40 sheltered retirement apartments (category 2) with resident's lounge, guest suite and estate manager's office together with access and parking provisions	40	Included	This site is understood to have been constructed after the 31 March 2009 SHLAA cut off date and therefore is recorded as included.	40
Land Adjacent Madison Wharf - Regatta Court, Shelly Road, Exmouth, Devon (Exmouth Docks Phases 8 And 9 Exmouth Devon)	Erection of 39 units in Regatta Court, (amended scheme to planning permission ref. 03/P3137).	39	Included	This site is understood to have been constructed after the 31 March 2009 SHLAA cut off date and therefore is recorded as included.	39
Land at community area, Highfield Rd, Dunkeswell	Erection Of 3 Two Storey Blocks Of Flats To Include 10 Elderly Persons Flats,	32	Excluded	This site is understood to not be a 'live' proposal and therefore is excluded.	0
Land At Rear Of West Close , West Street, Axminster, Devon	Erection of 16 houses and 8 flats (reserved matters on planning approval ref: 03/P2728 - 05.09.05)	24	Included	Development is expected to start at this site in the near future.	24

Address/ Reference	Commentary	Total Gross Potential Yield	Excluded/ Included for 5 Year Provision	Reason for Inclusion or Exclusion	Net Yield for 5 Years
Former Phillips Engineering Site West Street Axminster Devon	Erection of one block of 3 town houses & 6 flats & one block of 12 flats	21	Excluded	There is no evidence to suggest development at this site will start in the near future.	0
Chard Road, Axminster, Devon, EX13 7LL	Proposed Live/Work units redevelopment	20	Excluded	There is no evidence to suggest development at this site will start in the near future.	0
Salcombe Hill House Hotel, Beatlands Road, Sidmouth, Devon, EX10 8JH	Alterations (including partial demolition works) and extensions to former hotel to create 17 independent apartments with ancillary facilities, construction of access to serve parking area and construction of terraced garden area.	19	Included	This site is understood to have been constructed after the 31 March 2009 SHLAA cut off date and therefore is recorded as included.	19
Former Gas Depot, Fore Street, Exmouth, Devon	Construction of 18 flats (3 one bedroom flats and 15 two bedroom flats)	18	Included	Development is expected to start at this site.	18
Total		401			
Total – Discounting Exclusions		227			185

7.3 The majority of sites with planning permission but not under construction fall below the 15 unit threshold for discounting set out in the model approach (APPENDIX 2). Many of these sites are for just 1 or 2 dwellings and the model approach of halving the annual build out rate to 12 per annum does not affect these sites. This produces a distorted housing trajectory where the majority of units are shown as being built in 2010/11, which is considered to be an unrealistic assumption. Further work will be required to see how such sites could be discounted, including consideration of a lapse rate.

7.4 Five year supply of ready to develop housing land

Under the provisions of PPS3 the Council is required to demonstrate it has a five year supply of ready to develop sites for new housing in relation to housing requirements (in the case of East Devon established by the Devon County Structure Plan and the emerging South West Regional Spatial Strategy).

7.5 The SHLAA is an important tool to inform plan making through identifying the potential supply of land for housing on sites that may be developable in the future. However, this evidence cannot be relied upon to demonstrate a supply of sites that may be deliverable in the next five years. This is because the SHLAA identified many sites that are not compliant with current development policies for new housing in the East Devon plan area and as such are not ready to develop.

7.6 Until the adoption of the new development plan documents that give certainty over land allocations and include spatial planning policy for locations where new housing may be acceptable, the Council will demonstrate the supply of houses that are deliverable in the next five years in accordance with an advice note published by the Department of Communities and local government (CLG).

7.7 Table 3 (below) reveals that, under SHLAA terms of reference and methodology, there is a projected deliverable supply of dwellings in East Devon over the five years of 2009/10 to 2013/14 of 1,802 dwellings. None of the deliverable dwellings are at Cranbrook or none are at strategic large scale sites that fall inside/at what is interpreted to be the RSS Area of Search 4B area. They are, therefore, all deemed to be in/at the RSS definition of the 'Rest of East Devon'.

Table 3 - Potential number of dwellings that could be built in each of the first 5 years

Source of Dwellings	2009/10	2010/11	2011/12	2012/13	2013/14	Total 2009/14
Sites With Planning Permission for housing where houses were under construction and/or houses have already been completed at 1 April 2009	5	108	4	0	0	117
Sites with planning permission (15 units and over) where development had not started at 1 April 2009 ⁹	113	30	22	10	10	185
Sites with planning permission (under 15 units) where development had not started at 1 April 2009	0	1,292	6	0	0	1,298
Deliverable sites, including existing local plan allocations and unallocated brownfield sites (Site Assessed by the SHLAA Panel) at 1 April 2009	0	25	69	75	33	202
Total	118	1,455	101	85	43	1,802

⁹ Sites with planning permission (15 units and over) does not include reference to sites with a resolution to grant permission subject to a S106 Agreement (such sites include Seaton Regeneration Area and Cranbrook).

7.8 The Council is required to demonstrate a five year supply of readily available sites. Table 4 below compares Devon Structure Plan (2016) requirements against past and required completion rates to secure a five year supply.

Table 4 – Five Years Land Supply Requirements in East Devon Under Structure Plan Policy

	Strategic Housing Requirements for East Devon (Structure Plan)	Rest of East Devon	At Cranbrook	East Devon Total
A	Structure Plan Requirement 2001 to 2016 (15 years)	4,950	3,500	8,450
B	Implied Annual Rate 2001 to 2016 (15 Years)	330	233	563
C	Completions from April 2001 to March 2009 (8 years)	3,605	0	3,605
D	Annual Average Completion Rate 2001 to 2009 (8 years) (C/8)	451	0	451
E	Annual Average Completion Rate Required for Remainder of Structure Plan 2009 to 2016 (7 years) (A - C / 7)	192	500	692
F	5 Year Supply Requirement (E x 5)	961	2,500	3,461

7.9 The Devon Structure Plan will remain in place until superseded by the RSS. The Structure Plan requires 3,500 at Cranbrook for the 16 years from 2001 to 2016 and 4,950 for the rest of East Devon in this time period. This provides a gross total requirement of 8,450 dwellings. The table calculates average completion rates in past years and calculates future five year requirements. The five year future year assessment indicates a total requirement for 961 dwellings in the rest of East Devon and 2,500 dwellings at Cranbrook. Referring back to Table 4 it can be seen that the five year 1,802 deliverable dwelling figure for the Rest of East Devon comfortably exceeds the Structure Plan five year supply requirement of 961. However the zero deliverable supply at Cranbrook is 2,500 dwellings short of the five year requirement.

7.10 Table 5 below compares emerging South West Regional Spatial Strategy (Secretary of State Proposed Changes) requirements against past and required completion rates to secure a five year supply.

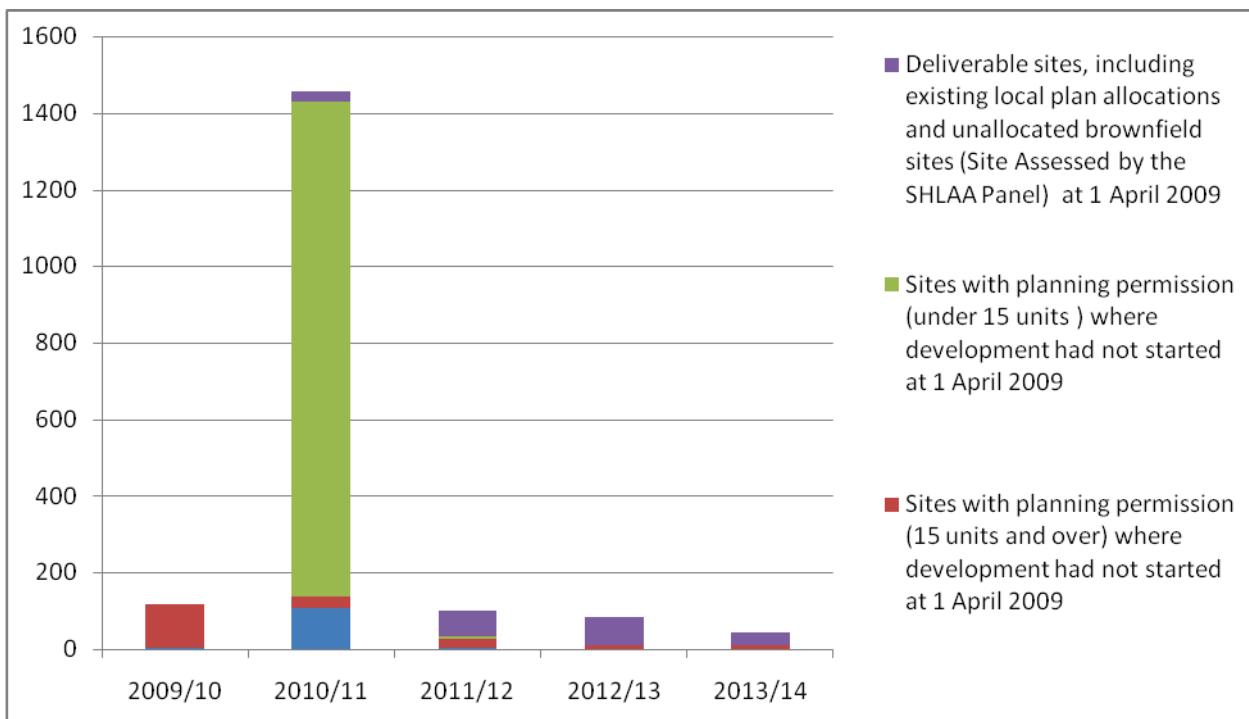
Table 5 – Five Years Land Supply Requirements in East Devon Under RSS

	Strategic Housing Requirements for East Devon (Emerging South West RSS)	Rest of East Devon	At Cranbrook and Area of Search 4B	East Devon Total
A	RSS Requirement 2006 to 2026 (20 years)	5,600	11,500	17,100
B	Implied Annual Rate 2006 to 2026 (20 years)	280	575	855
C	Completions from April 2006 to March 2009 (3 years)	911	0	911
D	Annual Average Completion Rate 2006 to 2009 (3years) (C/3)	304	0	304
E	Annual Average Completion Rate Required for Remainder of Structure Plan 2009 to 2026 (17 years) (A - C / 17)	276	676	952
F	5 Year Supply Requirement (E x 5)	1,379	3,382	4,761

7.11 The emerging RSS, if approved as currently drafted, requires at least 5,600 dwellings in the rest of East Devon for the 20 years from 2006 to 2026 and for 11,500 at Cranbrook and in Area of Search 4B (combined). This provides a gross total requirement of 17,100 dwellings. The table calculates average completion rates in past years and calculates future five year requirements.

7.12 The five year future year assessment indicates a total requirement for 1,379 dwellings in the rest of East Devon and 3,382 dwellings at Cranbrook and in Area of Search 4B (combined). As with comparative assessment against Structure Plan requirements the deliverable dwelling figure for the Rest of East Devon the deliverable figure exceeds the RSS five year requirement.

7.13 The graph below illustrates sources of housing provision and delivery projections by year. The SHLAA methodology indicates a very modest provision of housing in 2009/10, a massive peak in 2010/11 and then very modest provision thereafter. In reality this pattern of development will not happen. By using past trends as a guide, including taking into account the impacts of recent market turndown, it is entirely reasonable to envisage 1,800 (or more) dwellings being built in the Rest of East Devon over the five year 2009/10 to 2014/15 period. Development of 1,800 dwellings over five years would equate to an average provision of 360 dwellings per year in the Rest of East Devon.



7.14 Identification / assessment of sites with potential for housing and estimation of when site are likely to be developed.

Details of the Panels conclusions on the suitability, availability and achievability of the sites considered are available to view on the Council's website or on request from the Planning Policy section. Of the 481 sites considered only 173 were found to meet all of the developability criteria (suitability, availability and achievability). The overall yield of these sites is shown in Table 6 broken into three time bands.

Table 6 Potential residential development from sites not currently in the planning process, except sites stated in Seaton, Sidmouth and at Cranbrook

	Years 1-5	Years 6-10	Years 11-15	Total
Cranbrook proposed new settlement		1500	2250	3750
'West End Parishes' including Cranbrook ¹⁰	0	3226	5632	8858
Axminster	0	893	1165	2093
Budleigh Salterton	0	398	189	587
Exmouth	69	524	129	722
Honiton (includes site in Gittisham Parish E158)	0	966	646	1612
Ottery St. Mary ¹¹	0	0	714	714
Seaton (includes part of regeneration area E171)	0	675	131	806
Sidmouth (includes land at Howarth Close C144)	133	422	7	562
Total excluding West End	202	3878	2981	7096
Total including West End	202	7104	8613	15954
Rural locations and settlements outside 'West End' Parishes ¹²	0	3683	611	4259
Total including 'rural' locations and settlements	202	10787	9224	20213

7.15 In spatial terms the table shows substantial amounts of potential for housing around the towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Seaton and Sidmouth (although in the case of Exmouth this is relatively small in relation to the scale of the town and in Seaton and particularly Sidmouth this is limited in the later timeband). Further work is required in Exmouth to explore the potential developability of additional sites in order to improve the choice of strategic options for any expansion of the settlement.

7.16 The total shown in Table 4 for Cranbrook of 3750 would increase to 4650 by 2025/26 if the build out rates are applied consistently. This is well below the 7,500 for an expanded Cranbrook set out in the RSS. However, this reflects a delayed start date as advised by the Panel and a build out rate that could be considered conservative for a new settlement.

¹⁰ For the purposes of Table 6 'West End Parishes' are defined as Aylesbeare, Broadclyst, Clyst St. George, Clyst Honiton, Clyst St. Mary, Farringdon, Poltimore, Sowton and Whimple.

¹¹ Sewerage capacity constraints at Ottery put all sites back to the 11-15 year timeband.

¹² For the purposes of Table 4 "rural" locations and settlements are defined as Sites not within or adjacent to the seven main towns and outside of the 'West End' Parishes. Larger sites reliant on infrastructure improvements are in the 11-15 timeband and this judgement will need to be reviewed.

7.17 Much of the developable land identified by the SHLAA lies outside of the 'West End' Parishes and the seven main towns. None of these sites comply with current local plan policy and some of the sites included in these figures are considered excessively large in relation to the neighbouring settlements (if any). Such sites would be unlikely to comply with emerging planning policy, but may be more acceptable if significantly reduced in size. Caution should be used in making any assumptions about how much land in such areas is likely to be suitable for development and come forward through the planning process. However, initial analysis of the sites showing a potential yield of 25 and under (a total of 536 units) shows that about 80% of the yield is well related to existing settlements. This indicates that there is a good supply of potentially developable land to meet any housing need in the more rural settlements.

8 Consultation on the SHLAA findings

8.1 The East Devon SHLAA will not itself be subject to specific public consultation. This technical assessment is intended as evidence to support decisions taken by the Council in respect of future housing allocations. As such the SHLAA only identifies sites with the potential for housing development. The Council will take decisions on which sites will be allocated through the LDF process.

8.2 The LDF process allows for various stages of public consultation and it is during this process that the SHLAA and any other evidence that the Council will rely on in support of its proposals will be subject to public scrutiny.

8.3 The SHLAA report does not define any policy principles nor does it indicate how the Council as Local Planning Authority will respond to any planning applications or other planning issues.

APPENDIX 1: East Devon SHLAA Panel Membership

Category	Organisation
National Volume Housebuilder	Barratt Homes
Regional House Builder	Millwood Homes (left Panel during assessment)
Regional House Builder	Midas Homes
Regional House Builder	Devonshire Homes
Small Scale House Builder	K F Farleigh Ltd
Small Scale House Builder	Stevens Group
Small Scale House Builder	Gadd Group
Small Scale House Builder	N J Whittaker Ltd (did not attend Panel meetings)
Land Agent	Staggs
Land Agent	Fulfords
Registered Social Landlord	Devon and Cornwall Housing
Registered Social Landlord	Sovereign Housing Group
Development Professional	Bell Cornwell
Development Professional	Harcourt Kerr (left ED Panel during assessment)
Statutory Agency	Environment Agency
Statutory Agency	Highways Agency
Statutory Agency	Natural England
Statutory Agency	Highways Authority (Devon County Council)
Community representatives	East Devon District Concil Member

APPENDIX 2: Model approach to applying market conditions in 2009

Development status of the site	Model approach for assessing the contribution towards the supply of land for housing	Justification / Assumptions
Site currently started with dwellings	<p>The site will contribute towards the supply of deliverable sites in 1 - 5 years.</p> <p>Apply half the annual build out rate in year 1 - 5 to the calculation of build out rates set out in the Methodology.</p>	<p>Finances are already in place for the development of the site and there is a business case to complete construction in order to secure a return on the investment. Therefore it is likely that the site will continue to be built out.</p>
Site not yet started	<p><u>Sites of 15 dwellings or more</u></p> <p>60% of sites may not be developed in years 1 - 5.</p> <p>The remaining 40% of sites may be developed in years 1 - 5 but at a slower rate of delivery.</p> <p>Apply half the annual build out rate in years 1 - 5 to the calculation of build out rates set out in the Methodology.</p> <p>Exception: Where the site is known to be in the ownership / control of a developer and / or where there is a known financial commitment to affordable housing through a Registered Social Landlord, it is likely this site will be developed in years 1 - 5. These sites will be included in the 5 year housing supply calculation, before 60% of sites are discounted.</p> <p>The Panel has advised that no development will take place in 2008 / 2009. This is reflected already in the model for calculating commencement and build out rates for SHLAA sites.</p>	<p>Threshold follows PPS3 threshold for affordable housing.</p> <p>Due to current economic circumstances there are likely to be difficulties arising for developers to secure finances for the development of the site and for the sale of the completed dwellings. The impact of current market conditions may be most acute on consented sites with Section 106 obligations, typically schemes of 15 dwellings or more where there is a policy requirement for affordable housing. Larger schemes may also be required to provide financial contributions towards infrastructure and community facilities.</p> <p>The assumption is that up to 60% of consented sites may not be developed, particularly where section 106 obligations make development unviable in the current market conditions. It is likely that these planning consents will lapse after 3 years. While an upturn in the economy may prompt a new planning consent being obtained in the future, it may take a further year to secure a new planning permission and other consents and there will be a lead in time to development of up to two years thereafter.</p> <p>Where sites are in the ownership / control of a developer and / or where funding for affordable housing is in place there is a business case to secure a return on the investment. There it is likely that the site will be developed.</p>
	<p><u>Sites of less than 15 dwellings</u></p> <p>Sites will continue to be developed in years 1 - 5, but with a commencement deferred by one year (e.g. to 2009/2010), and with a slower rate of delivery.</p> <p>Apply half the annual build out rate in years 1 - 5.</p>	<p>Threshold follows PPS3 threshold for affordable housing.</p> <p>Smaller consented sites are less likely to be subject to Section 106 obligations including affordable housing and as such are less likely to be affected by current market conditions. Schemes may also come forward for housing for rent.</p>

APPENDIX: 3 Self assessment of SHLAA soundness

Paragraph 14 of CLG's SHLAA Practice Guidance defines certain minimum core outputs and process requirements for a Strategic Housing Land Availability Assessment. These two elements form the basis of the Authority's self assessment of this SHLAA report, in terms of demonstrating compliance with the requirements of PPS3.

1 SHLAA Core Outputs		
1	<i>A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)</i>	Yes A list of identified sites which have been assessed for their deliverability and / or developability are available on the Council's web site. Inset maps for all sites assessed (excluding planning commitments) are also published on the Council's website. No broad locations have been identified.
2	<i>Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when an identified site is realistically expected to be developed</i>	Yes Each identified site has been assessed for 'suitability', 'availability' and 'achievability' in accord with the definitions set out in paragraph 54 of PPS3, stages 7a, 7b and 7c of CLG's SHLAA Practice Guidance and the Methodology for preparing SHLAAs in the Exeter Housing Market Area subregion.
3	<i>Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)</i>	Yes The information on potential dwelling yield (minimum, maximum and mid point yield) is contained in the schedule of sites available on the web site.
4	Constraints on the delivery of identified sites	Yes Constraints on the delivery of identified sites are included in the schedule of sites available on the web site.
5	Recommendations on how these constraints could be overcome and when	Yes Consideration of how those constraints could be overcome and when are included in the schedule of sites available on the web site.
2 – SHLAA Process Checklist		
1	The survey and Assessment should involve key stakeholders including house builders, social landlords, local property agents and local communities. Other relevant agencies may include the Housing Corporation and English Partnerships (a requirement in areas where they are particularly active)	Yes Land owners, agents, developers, architects, registered social landlords, housing authorities, and other organisations with an interest in local housing delivery have all been involved, both in the development of the SHLAA Methodology and in the submission and assessment of sites. A 'call for sites' was publicised in the local press in June 2008 and by contacting people/organisations that have expressed an interest in local planning issues in East Devon. The call was published on the Authority's website and individual letters were sent to local Parish councils. The Authority, in line with the other Local Authorities in the Exeter HMA, has used a Panel approach to the assessment of sites in terms of their 'suitability', 'availability' and 'achievability' in accordance with the Methodology for preparing SHLAAs in the Exeter Housing Market Area subregion. A list of Panel members for the preparation of the East Devon SHLAA is included as Appendix 1.