

# EAST DEVON

## 2022 Housing and Economic Land Availability Assessment (HELAA)



November 2022

# 2022 East Devon Housing and Economic Land Availability Assessment

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## Disclaimer

In relation to the information contained within the East Devon Housing and Economic Land Availability Assessment (HELAA), and any other report relating to the findings of the HELAA, the Council makes the following disclaimer, without prejudice:

- The HELAA only identifies available sites. It does not allocate sites for development. The allocation of sites for future housing or economic development will be determined through the Local Plan or other Development Plan Documents prepared by East Devon District Council or through Neighbourhood Plans.
- In relation to the information contained within this report, its appendices and any other report relating to the findings of the HELAA, the identification of potential housing and economic development site, buildings or areas within the HELAA its appendices and any other report relating to the findings of the HELAA does not state or imply that the Council would necessarily grant planning permission for development. All planning applications for development will continue to be considered against the appropriate policies in the development plan and have regard to any other material considerations.
- The inclusion of potential housing and economic development sites within the study does not preclude them from being considered for other purposes.
- The boundaries of sites, buildings and areas are based on the information made available at the time by landowners and agents. The HELAA does not limit an extension or contraction of any of these boundaries for the purpose of a planning application or development plan allocation.
- The exclusion of sites from the study (i.e. because they were not identified) does not preclude either the possibility of a development plan allocation or the grant of planning permission for residential or economic development on such sites. It is acknowledged that sites will continue to come forward that may be suitable for residential or economic development that has not been identified in the HELAA.
- Where it is set out, any estimation of when development may come forward is based on an assessment at the time of the study. Circumstances or assumptions may change which may mean sites could come forward sooner or later than originally envisaged.
- The Council has assumed that the sites that contain an element of previously developed land are identified as previously developed land for the purposes of the HELAA only. However, this assumption does not constitute the Council's formal determination of the status of the established lawful use of the site and does not mean that the Council formally considers the site as previously developed.
- The information that accompanies the HELAA is based on information that was available at the time of the study. Users of the study's findings will need to appreciate there may be additional constraints on some sites that were not identified at the time of the survey and that planning applications will continue to be treated on their merits at the time of the planning application rather than the information contained within the assessment. Likewise, some of the identified constraints may have been removed

since the information was compiled. Issues may arise during the course of a detailed planning application that could not/were not foreseen at the time of the assessment. Applicants are therefore advised to carry out their own analysis of sites to identify any constraints or other information for the purpose of a planning application and not rely solely on the findings of the HELAA.

- The housing or economic development capacity of a site in the study either relates to the number of dwellings or floorspace indicated by the site promoter or is an estimate based on the HELAA methodology. However, the site capacities in the study do not preclude densities or floorspace being increased on sites. Nor does it mean that the densities or floorspace envisaged within the assessment would be appropriate and these would need to be considered through the relevant planning process, for example either a development plan allocation or when a planning application is submitted.
- The study had a cut-off date of 10 May 2022 for new sites, 31 March 2021 for employment planning commitments, 31 March 2022 for housing planning commitments and 29 September 2022 for substantive updated information, including confirmation of continued availability. The findings are a 'snap-shot' of information held at that time. Therefore, some of the information held within the HELAA may have changed since that date. For example, sites that are identified as not having planning permission may have secured permission since the relevant cut-off date. Similarly planning permission may have lapsed on other sites. New sites or amended sites areas coming forward after 10 May are not included in the 2022 HELAA.
- The conclusions in the HELAA are based on information available at the time of the study and the council does not accept liability for any factual inaccuracies or omissions. The information will be a snapshot of the data captured for HELAA sites submitted at a point in time. Information will be compiled with all due care and attention, however inevitably discrepancies may occur. The document should therefore be considered as a live one that will be updated.
- The Council intends to use the HELAA as a 'living document' that will be updated on a regular basis.

## EXECUTIVE SUMMARY

1. The District Council is now preparing a new Local Plan for the period 2020 to 2040. This will provide a framework for future development across the district. Instead of a Strategic Housing Land Availability Assessment, Government planning policy and guidance allows the Council to produce a combined Housing and Economic Land Availability Assessment (HELAA) as evidence to inform plan-making.
2. The East Devon Housing and Economic Land Availability Assessment (HELAA) November 2022 forms part of the evidence base for the emerging East Devon Local Plan. The HELAA Report, together with its supporting Appendices, assesses the potential supply of land for residential and economic development related uses. The HELAA provides an assessment of the potential sites in terms of their suitability, availability and achievability. The HELAA 2022 supersedes the previous Strategic Housing Land Availability Assessments (SHLAA) for 2010, 2011 and 2012 which the Council previously published as part of the evidence base for the East Devon Local Plan 2013 to 2031.
3. The East Devon HELAA 2022 has followed the methodology set out in the Planning Practice Guidance (PPG) on Housing and Economic Land Availability Assessment and has been produced to align with the 2021 HELAA methodology set out in Appendix A of this report. This methodology was collectively prepared by councils in the Greater Exeter Housing Market Area comprising Mid Devon, East Devon and Exeter, with the addition of Dartmoor National Park Authority. Teignbridge is in the Housing Market Area but produced its HELAA methodology in 2020.
4. Sites assessed for housing in the HELAA primarily focused on sites identified as available for housing (ie dwellings) but they also included sites available for residential institutions, mixed use (where housing is the dominant use) and sites for gypsy and travellers or travelling showpeople (permanent pitches/plots or transit sites). Sites assessed for economic use largely focused on employment uses (industrial/warehousing; or offices) but also included retail, hotels, mixed use and 'other'. Some submissions only proposed 'other' use without specifying the intended use so they could not be assessed for suitability or achievability.
5. The East Devon HELAA's outputs assist the Council in identifying the choices available for site allocations to meet development needs. They have been used to inform the initial work undertaken in 2022 as a step in the 'site selection' process which led to potential site allocations in the Draft Local Plan. The HELAA sits alongside a range of other evidence exploring the development needs of the area and how they should be met, supporting the draft Local Plan for the consultation stage.
6. The HELAA evidence is also available for use in plan-making for Neighbourhood Plans.
7. However, it is important to emphasize that the inclusion of any site in the HELAA does not confer that it will be allocated for development. The decisions made regarding which sites will be proposed for allocation in the emerging East Devon Local Plan (or Neighbourhood Plans) which will be subject to full public consultation and examination before any site or plan is adopted.

8. A key part of the HELAA process is the Call for Sites. This is an open process where landowners and others could suggest sites for development and provide supporting information. Appendix H is an example of the form used in a Call for Sites. The East Devon HELAA benefits from site submissions made in response to three Call for Sites in held in 2017, 2021 and 2022. The process resulted in a total of 827 submissions of sites in East Devon. Seven submissions have since been withdrawn. Due to full or partial overlaps and submission changes, 696 sites are identified for assessment.
9. Appendix E(iv) provides a handy list of all the sites for assessment in parish name order with sites listed by HELAA ref. no. in each parish. There are also separate lists of the sites submitted (including overlap descriptions) from the three Call for Sites in Appendix E which is broken down in to parts E(i) - 2017 Strategic Sites, E(ii) - 2021 and 2017 (non-strategic) sites, and E(iii) - 2022 sites). Corresponding 'Site Finder' maps showing the locations of the sites are in Appendix D which is broken down in to parts D(i), D(ii), and D(iii).
10. The Call for Sites is complemented by a desk top review of other sources of supply (see Appendix G). This includes a broad range of sources. Supply already identified comes from sites already in the planning system. These comprise: planning completions 01 April 2020 to 31 March 2022; dwellings not yet completed on sites where development has commenced; and dwellings on sites with unimplemented planning permission that had not expired as at 31 March 2022. The allocations for the Cranbrook Expansion Areas in the adopted Cranbrook plan are included, as are site allocations for housing or employment in the East Devon Local Plan 2013-2031 that do not have planning permission.
11. There are other potential sources including recently refused, withdrawn or lapsed planning applications, sites identified in the Urban Capacity Study and sites adjacent to proposed settlement boundaries not yet submitted through the Call for Sites. Work on these other potential sources is in progress but the process spans many potential sites. The results will be reported through an Addendum to the HELAA, although given the large volume of already submitted sites, the number of additional sites ultimately included in the HELAA Addendum may be relatively few.
12. The current tally of 696 sites identified and mapped to date (including partial overlaps that are counted) were assessed using the robust methodology which is described in Appendix A. In order to ensure testing was carried out consistently a set of assumptions and principles were established to apply to all sites. Whilst a number of the assessments used mapped information or measurements, others required specialist input or judgement. A number of specialist technical consultees, both within and outside of the Councils, were engaged. The site assessment profiles (including a site map for each site) show the assessment results for all the assessed sites, and they are set out in Appendix F which is broken down in to parts F(i), F(ii), and F(iii).
13. Sites were deemed to be unavailable where there was no evidence that the site was available, or alternatively, there was evidence that the site was unavailable or had become unavailable. The 2021 and 2022 submissions are recent. However it is 5 years since the 2017 submissions. The Council made strenuous efforts to find out if sites submitted in response to the 2017 Call for Sites but not subsequently resubmitted in 2021 or 2022, were still available. Of the strategic 2017 sites, one

was no longer available. There were also an estimated 1,034 dwellings on “suitable and achievable” non-strategic sites where continued availability was not confirmed but neither were the sites confirmed as not available.

14. The methodology applies a two stage process to determine whether potential sites are in suitable locations for housing and economic development. Sites were deemed to be unsuitable if they did not pass the Stage A Suitability Assessment, or if having passed Stage A, they then did not meet all the relevant criteria for the Stage B Suitability Assessment. The criteria used for those stages are explained broadly in the methodology and more fully in the HELAA report. At this stage in plan-making, whilst the spatial strategy is still evolving, the main stage A criteria related to impacts on sites of biodiversity or geodiversity importance, the noise vector at Exeter Airport (housing only) or Flood Zone 3b (but taking a precautionary approach based on Flood Zone 3). Sites that pass Stage B may still have be subject to some constraints and this is reflected in a reduced site capacity.
15. Sites were deemed to be probably unachievable where it was considered there was no reasonable prospect that the site could be developed. As part of the HELAA process, testing viability is by necessity a broad approach. Drawing on their expertise and informed by preliminary site assessment profiles, the HELAA Panel reached conclusions opinions on whether sites that were available and had passed Stage A Suitability Assessment were probably achievable or probably unachievable for housing and for economic uses. The Panel’s role focuses on site achievability so the Panel does not determine site allocations (see Appendices B and C). Current achievability is reflected in the timescale indicated in the site assessment profile and the trajectory. Only sites with planning permission or allocations where there have been pre-application discussions are identified as deliverable ie in years 1 to 5. All other sites form Call for sites are forecast for delivery in years 6 to 10 or later. Sites identified by the Council in the Local Plan will be subject to more detailed consideration through the plan making process.
16. For the HELAA, the capacity of sites was assessed by using both information supplied by site promoters and a typology set out in the HELAA methodology. This developed a range of housing densities for different development forms and location types. The densities were applied to the site’s Net Development Area after land was discounted, as explained in the HELAA report. The sites assessment profiles in Appendix F list the results. The conclusion about the site’s potential is included in the site assessment profile. For housing sites that are available, suitable and achievable, the lowest of the mid-forecast or the upper end of the submission range is counted for the figure used for the HELAA trajectory. Economic (employment led) sites that suitable, available and achievable are counted for the HELAA trajectory based on Gross Development Area.
17. Windfall sites are another important source of supply of land for housing which must be considered alongside the HELAA. Windfall sites are those developments not specifically identified in the development plan but still come forward and deliver new homes during the plan period. At present an allowance is included only for housing windfall, based on the evidence in the 2022 East Devon Housing Monitoring Update.
18. Results of the HELAA are provided in a number of appendices to this report. Appendix E(iv) provides a full list of sites. These are sorted by parish and site

reference. There are separate lists for the sites submitted at each stage (Appendices E(i), E(ii) and E(iii)). Appendix E(v) provides a list of sites not currently suitable, deliverable or developable. Appendix E(vi) provides a list of sites discounted from the HELAA including a short description of why they were excluded. Appendix F provides completed site assessment profiles for each site. As the number of assessments run to hundreds of sites, and each profile runs to several pages this is a substantial document, and it is broken down in to F(i), F(ii) and F(iii). Due to the size of the appendices they have all been published as separate documents.

## 1.0 Introduction

- 1.1 East Devon District Council is responsible for preparing and keeping up to date a Housing and Economic Land Availability Assessment (HELAA) to help inform future plan making in East Devon. The National Planning Policy Framework (NPPF) requires local planning authorities (LPA) to have a clear understanding of the land available in their areas.
- 1.2 The Local Planning Authority is responsible for the processes to identify sites, for undertaking the assessment and producing the resultant HELAA report as evidence for plan-making and development management purposes, including the site assessments.
- 1.3 This 2022 East Devon Housing and Economic Land Availability Assessment is a technical study that assesses the suitability, availability and achievability of land for development. The process was previously known as the Strategic Housing Land Availability Assessment (SHLAA) and has been renamed as the HELAA to reflect its applicability to other uses in addition to housing; that is, employment, and mixed use.
- 1.4 This 2022 HELAA report covers the district of East Devon. It builds on and updates analysis and evidence which was reported to the Council's Strategic Planning Committee on 3 May 2022 in a Part 1 report. For the avoidance of doubt, the November 2022 East Devon HELAA report now supersedes that initial evidence and is a combined report updated information about sites from Part 1 and further work undertaken in 2022, notably assessment of sites submitted in response to another Call for Sites in 2022.

### **What is included in the report?**

- 1.5 The HELAA report assesses the development potential of sites submitted to the Council through the HELAA process in 2017, 2021 and 2022. Other supply sources such as commitments from planning approvals, the recently adopted Cranbrook Plan DPD and sites in the ownership of the Council also feed into the analysis of potential supply.
- 1.6 Work is ongoing to assess other supply sources such as public sector land, underused land and buildings, although sites from these sources have been identified from sites submitted through the three Calls for Sites held in 2017, 2021 and 2022. Any further sites identified and assessed using the HELAA method will be reported in a future HELAA Addendum report.
- 1.7 The HELAA has been prepared in accordance with the National Planning Policy Framework (last updated in July 2021) and Planning Practice Guidance on Housing and Economic Land Availability (launched on 6 March 2014 with subsequent updates – the latest being July 2019).
- 1.8 This report is structured around the following sections:

- Section 1 - Introduction
- Section 2 – What is a Housing and Economic Land Availability Assessment?
- Section 3 - Policy Context
- Section 4 producing the HELAA report in stages
- Section 5: Methodology Stage 1 Site / broad location identification
- Section 6 Methodology Stage 2 Site / broad location detailed assessments
- Section 7 Methodology Stage 2 Assessing site development potential
- Section 8 Methodology Stage 3 Windfall Assessment
- Section 9 Methodology Stage 4 Assessment Review
  - A housing trajectory of anticipated housing development
  - 5 years housing land supply
  - An employment land trajectory
- Section 10 Methodology Stage 5 Final Evidence Base

## 2.0 What is a Housing and Economic Land Availability Assessment?

- 2.1 The purpose of the HELAA is to understand the level of housing and economic land potential within the District and to identify sites which are considered suitable for housing or employment led development and likely to be developed. The assessment incorporates the Strategic Housing Land Availability Assessment (SHLAA) requirement of the National Planning Policy Framework (NPPF) and the assessment of land available for economic development referred to in Planning Practice Guidance (PPG) on Plan making.
- 2.2 A Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land in a plan area that is suitable, available and achievable for housing and economic development over the plan period. In summary, the HELAA's primary role is to provide evidence which:
- Identifies sites and broad locations with potential for housing and economic development
  - Assesses their development potential; and
  - Assesses their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 2.3 The HELAA informs on the “deliverable” and “developable” aspects of specific sites by providing an information and evidence base, in accordance with the NPPF July 2021 definitions. Its purpose is to collect and collate information that provides a summary of each site's development potential at the time of the assessment.
- 2.4 The HELAA report is technical evidence. It is a key part of the evidence base needed to underpin and justify policies in development plans for housing and economic development. It is an important first step in the process used by the LPA to plan proactively by identifying potential sites that could go forward into the Local Plan to meet housing and employment needs
- 2.5 As an evidence document, the HELAA report must be robust, thorough and proportionate for the purposes of plan-making, if the policies which rely on it for evidence are to be found sound.
- 2.6 The full HELAA process is not simple or quick. It should be noted that figures may change, and indeed have changed throughout the process as new sites have been put forward or been withdrawn, or judgements changed. Results of a HELAA published in a HELAA report are therefore a snapshot in time.
- 2.7 The HELAA informs plan making but does not in itself determine that a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development. It is the role of the HELAA to provide information on the range of sites that are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.

- 2.8 The PPG on HELAA indicates what inputs and processes can lead to a robust assessment of land availability. The latest East Devon HELAA responds to the requirements of the NPPF and PPG. The Council has applied the guidance on inputs and processes. However, key inputs such as a new spatial strategy and strategic policies for East Devon have not been available for the HELAA process. The plan-making process had not reached the stage of endorsing the spatial strategy when the point of the latest HELAA assessments were undertaken. They have therefore not been part of the latest HELAA. Consequently the 2022 HELAA output is a stepping stone in the evidence base.
- 2.9 A HELAA can be updated, for example with further call for sites. If there is robust evidence of a factual error in an assessment, then a correction can be published. If there is evidence of a change in circumstances, this can inform a subsequent HELAA report, or HELAA addendum. Endorsement of the spatial strategy or strategic policies would be regarded as a change in circumstances.
- 2.10 The HELAA does not allocate sites for housing or economic development. That is done through a separate, more detailed planning assessment and consultation, to support the Local Plan. To drive plan-making forward, the Council undertook parallel work in 2021/2022. This focused on more detailed site assessments as part of the ongoing work as part of the site selection<sup>1</sup>, and on the generation of alternative options for the spatial strategy. Early output from the HELAA has fed into the site selection work. However, the findings of the site selection work post-date the 2022 HELAA assessments.
- 2.11 This suggests that at this point in time the HELAA is not the primary evidence base and monitoring report for all aspects of the District's housing and economic development land supply. The Council is currently considering how best to combine the evidence to update the robustness of the HELAA evidence so that it addresses the PPG guidance on inputs and processes, and when this could be undertaken. The main choices are as follows:
- The PPG allows the Council to use a different methodology for the HELAA, although this will need to be justified. For example, the site selection process (and related reports), the Housing Monitoring Update evidence and the Employment Land Review evidence could in combination fulfil the PPG HELAA requirements.
  - The alternative is to completely update the HELAA assessments each time a stage in the site selection process is completed. This will be onerous in East Devon as the number of sites identified by the HELAA process is huge.

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<sup>1</sup> The allocations' site selection process determines which sites should be identified for residential development and economic development uses according to which timescale. The methodology behind the site selection process is currently set out in the document titled East Devon Local Plan 2020-2040 – Site Selection Methodology<sup>1</sup>. That document informed the Council's Strategic Planning Committee at their meetings on 9 August, 6 September, 29 September when considering site assessment work. The Council has been working towards a full Site Selection report which will explain whether each site should be allocated, or not, with reasons why, based upon the housing/ employment requirement, spatial strategy and site assessment

It would mean reviewing the suitability assessment of all available sites, to assess the site in terms of strategy compliance. This would also be the opportunity to identify whether there is the potential for mitigation measures to overcome relevant constraints, in the light of emerging plan policies that may enable sites to be considered suitable.

2.12 Whilst the HELAA is a key document, it is only one document of the evidence base used to inform the preparation of the Local Plan. It is also important to understand what the HELAA does and does not do.

a) What it is :

- It is a document which informs Local Plan preparation
- It is a process for assessing sites submitted to the Council for consideration as a future allocation
- It is a document that provides the Council with a general understanding of the development of potential sites
- It is a document that presents an indicative housing delivery trajectory up to 2040 based on all sites determined to be deliverable or developable
- It is a process that allows a windfall allowance for housing to be calculated.

b) What it is not:

- It is not a process that allocates land for development
- It is not a document that grants planning permission or suggest that planning permission should be granted
- It is not Permission in Principle with specific site capacity
- It is not a document that sets out a phasing plan for delivery up to 2040 and beyond
- It is not of supply of expected windfall sites.

## 3.0 Policy context

- 3.1 The policy context for the Housing and Economic Land Availability Assessment (HELAA) is set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). In accordance with NPPF (para 31) local planning authorities should ensure that the preparation and review of all Local Plan policies is based on adequate, up-to-date and relevant evidence. Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other economic development land uses are integrated, and that they take full account of relevant market and economic signals.
- 3.2 NPPF (para 122) makes clear that planning policies and decisions “should be informed by regular reviews of.....land availability”. The NPPF (para. 68) requires strategic policy-making authorities “to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.”
- 3.3 The Government updated the national Planning Practice Guidance on the Housing and Economic Land availability in July 2019. That HELAA guidance should be read in conjunction with the related PPG guidance on making efficient use of land, including finding alternative appropriate uses for land currently protected or retained for other uses including previously development land, and planning for higher density development.
- 3.4 PPG on plan making provides guidance about Authorities’ use of the evidence base to assess “the existing and future supply of land available for economic development and its suitability to meet the identified needs. This should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments”. Consistent with the NPPF, the PPG acknowledges the advantages of carrying out land assessments for housing and economic development as part of the same exercise so that sites may be allocated for the use that is considered to be most appropriate. The PPG states that land availability assessment should:
- Identify sites and broad locations with potential for development;
  - Assess their development potential;
  - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 3.5 . The East Devon HELAA 2022 has combined the work on assessing housing and employment sites.
- 3.6 PPG on HELAA sets out the method for assessing housing and economic land availability. Details of the HELAA methodology used in East Devon is set out in Appendix A to this HELAA report.

### Definitions

- 3.7 The East Devon HELAA relies on the definitions in the NPPF that are relevant to land availability assessment The suitability, availability and achievability of a

potential site will inform whether the site is considered deliverable or developable. The glossary to the NPPF defines deliverable and developable as the following:

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged

- 3.8 In accordance with the NPPF local planning authorities can make an allowance for windfall sites in the SHELAA if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, any allowance should be realistic having regard to historic windfall delivery rates and expected future trends, and should not include residential gardens (paragraph 70).
- 3.9 Sections 5 to 10 of this report applies the methodology for assessing housing land availability in the context of guidance contain in the PPG centred on five stages.
  - Stage 1 Sites/broad locations identification
  - Stage 2 Sites/broad location assessments
  - Stage 3 Windfall assessment
  - Stage 4 Assessment review
  - Stage 5 Final evidence base
- 3.10 In line with the duty to cooperate the PPG requires local planning authorities to work with other local planning authorities within the relevant housing market area or functional economic market area when assessing availability of land. Key stakeholders should be involved from the earliest stages of preparation including, amongst others; developers, land promoters, local property agents and local communities.
- 3.11 The PPG requires plan makers to be proactive in identifying as wide a range of sites as possible, including existing sites that could be improved, intensified or changed. Sites that have particular policy constraints should also be included. However, constraints should be clearly set out and tested, with conclusions drawn on whether constraints can be overcome.

- 3.12 The assessment of suitability of sites for development should be guided by the development plan<sup>2</sup>, emerging plan policy and national policy, as well as market and industry requirements. The PPG notes that when assessing sites against the adopted development plan, regard should be had to how up-to-date the plan policies' are. Sites in existing development plans, or with planning permission, will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability.
- 3.13 With regard to availability the PPG states that 'A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell'. PPG guidance is that consideration should be given to the delivery record of developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.
- 3.14 In terms of achievability PPG states that "A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period".
- 3.15 Therefore a judgment would need to be made on whether there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. Essentially this is a judgment based on economic viability. The type of factors that can make a site not viable or deliverable which the HELAA Panel explored included :
- the attractiveness of an area – proximity to roads and labour, supply chains and the strength of local markets and local demand for sites
  - costs of
    - remediating contaminated land
    - terracing and land stabilisation to overcome steep slopes
    - the need for third party land which may not be available in order to achieve necessary highway improvements to mitigate the impact on traffic from the development on the local road network
    - bringing in utilities and infrastructure to sites over long distances from existing networks
    - information/surveys eg for Mineral Resource Assessment,
- 3.16 Once potential sites and broad locations have been assessed the PPG requires information to be collected to produce an indicative housing trajectory, to enable the preparation of an overall risk assessment.
- 3.17 To ensure consistency, accessibility and transparency across assessment the PPG specifically requires the following:

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<sup>2</sup> PPG does not clarify how local planning authorities can assess the suitability of a site in terms of strategic context from the time when the current adopted plan is

- a list of all sites or broad locations considered, cross-referenced to their locations on maps;
- an assessment of each site or broad location, including:
- where these have been discounted, evidence justifying reasons given;
- where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- an indicative trajectory of anticipated development based on the evidence available.

## 4.0 Producing the East Devon HELAA

4.1 The Council prepared the HELAA report in stages, reflecting both the gathering of evidence and the step process set out in PPG, including a response to the review of the evidence and early stages in plan making which identified the need to seek additional land for consideration through the HELAA and plan-making processes.

### a) Call for sites- 2017, 2021 and 2022

4.2 In line with PPG, the Council has undertaken a transparent process to identify as many potential opportunities as possible. It has issued not one but three 'Call for sites' (including broad locations for development) in 2017 (jointly with the other 3 authorities in the Greater Exeter Strategic Partnership (GESp) process) and for East Devon in 2021 and 2022. These were aimed at as wide an audience as is practicable so that those not normally involved in property development had the opportunity to contribute. The Call for sites submission forms set out the information sought from respondents, which included:

- site location;
- suggested potential type of development (eg economic development uses – retail, leisure, cultural, office, warehousing etc.; residential – by different tenures, types and needs of different groups such as older people housing, private rented housing and people wishing to build or commission their own homes);
- the scale of development; and
- constraints to development.

4.3 An example of the form containing the information sought that was made available for submission to use is set out in Appendix H of this HELAA report.

4.4 This HELAA report considers the very large number of sites submitted through three "Call for sites". Appendix E(iv) lists all the sites identified from the Call for Sites in parish order. Appendices E(i), E(ii), (Eiii) are the same sites, listed by their submission/assessment date (ie 2017, 2021/2017 and 2022) and the lists include the site HELAA reference, the site address, whether they are 'available, suitable, achievable' and the nature of site overlaps. To complete the information, Appendix E(v)1 lists all currently available housing sites that are not suitable, deliverable or developable, E(v)2 lists all currently available economic/employment led sites that are not suitable, deliverable or developable.

4.5 The three call for sites resulted in 827 submissions of sites in East Devon, including resubmitted sites (partial or whole) and overlaps. Even when resubmissions are taken into account, and 7 withdrawn/no longer available sites, there were 636 sites (net). In total 696 sites are counted due to partial overlaps (listed in Appendix E(iv)). This was a significantly high number of submissions to process and analyse.

4.6 Production of the HELAA report's outputs is complex as

- Assessments are detailed, consistent with the current PPG on HELAAs
- 359 of those sites, including 83 strategic sites, are from the 2017 Call for sites
- 193 new sites and 130 resubmitted sites from the 2021 Call for sites

- 91 new sites and 54 resubmitted sites are from the 2022 Call for sites
- Many 'resubmitted' sites had amended boundaries or amended development proposals
- There will also be other sites to assess, including those that will come through the current call for sites
- The multiple overlaps of sites adds to the HELAA's complexity, but have had to be identified and an assessment made of which sites or parts of sites to count. This is necessary to avoid double counting the housing and employment land identified as suitable, available and achievable.

#### **b) Stages of HELAA preparation**

4.7 The HELAA progressed in stages in order to manage the magnitude and complexity of the work, to provide transparency and to facilitate reports of the progress of HELAA preparation to the Council's Strategic Planning Committee.

4.8 The four stages to date are as follows:

#### **1. The 2019 GESP HELAA report**

4.9 East Devon District Council together with Exeter City, Mid Devon and Teignbridge District Councils provided the resources to undertake the Call for sites in 2017, and undertake the work to produce a HELAA report. This included HELAA Panel meetings to consider the achievability of strategic sites. 359 sites were in East Devon, 83 of them were strategic sites (see Appendix D(i) – maps and Appendix E(i) for the list of sites. The GESP HELAA report 2019 from strategic sites identified from the 2017 Call for sites is detailed in the HELAA report. That report is available on line<sup>3</sup> so is not duplicated in the East Devon HELAA 2022 report.

4.10 Whilst not formally endorsed by the District Council, that HELAA is an important source of evidence about potential sites. 130 sites submitted in 2017 were resubmitted through the 2021 Call for sites.

4.11 The 2017 survey data is more than 5 years old. So in 2022 the District Council undertook the following work to update the information on those sites' availability:

- The District Council contacted the submitters of the 83 strategic sites in East Devon assessed in the 2019 GESP HELAA. It took considerable effort to reach the contacts, due to changes in agents and/ or contact details. The responses confirmed that 76 remain available, 4 sites were confirmed as no longer available (their supply is counted as NIL) and 3 are currently unconfirmed regarding availability.
- The Council also sought to contact 146 submitters of the smaller non-strategic sites who had not resubmitted. The lower response rate of confirmation of availability on those sites appears to have been largely due to the Council not being informed of changes in agents for clients or people

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<sup>3</sup> [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk) Housing and Economic Land Availability Assessment (including appendices) 2019

changing email addresses. The Council updates contact details when advised of changes.

- 4.12 In addition, the presentations by agents/developers on sites to the Strategic Planning Committee in 2022<sup>4</sup> provided further evidence on site availability and intentions.
- 4.13 This information about the confirmation of site availability has been captured in the Council's HELAA database, and is reported in the detailed site assessment profiles in Appendix F. It is taken into account in the analysis of potential supply of dwellings and employment land.

## **2. The East Devon HELAA Report – Part 1**

- 4.14 In 2021 East Devon District Council undertook another Call for sites which resulted in a further 193 sites being identified as well as the 130 resubmission. The Council undertook work in 2021 and 2022 to assess sites which were received as the result of the 2017 and 2021 Call for sites inviting sites to be submitted by site promoters. This included the 276 submissions from 2017 that had not been assessed by the GESP HELAA report. Initial detailed assessments relating to the 2017 and 2021 Call for sites were set out in the draft interim 2022 East Devon HELAA – Part 1 report. A report on that document to the Strategic Planning Committee on 3 May 2022 was an early opportunity to present HELAA output for East Devon to Members to note progress.
- 4.15 The Part 1 report was technical evidence. It focused on the assessment of potential housing sites in the District, including mixed use sites including housing, identified from sites put forward through the 'Call for sites' processes which invited site submissions in 2017 and 2021. Work to produce the Part 1 report was complicated by the level of site overlaps.
- 4.16 The Part 1 report was technical evidence which :
- Explained the process of assessing site availability, suitability and achievability, and calculated delivery rates, assessing the delivery of sites for development against need for housing development and for economic development
  - Set out the latest agreed HELAA methodology (*See Appendix A* – also included in this 2022 HELAA report)
  - Set out the latest agreed HELAA Panel's Constitution and Terms of Reference (*See Appendix B*) and identifies the Panel (*See Appendix C*) – Appendices B and C are also included in this 2022 HELAA report
  - Included maps showing where the sites are (*See Appendices D(i) and D(ii)*) – also included in this 2022 HELAA report
  - Provided a list identifying each site in East Devon submitted through two calls for sites (2017 and 2021) which were been assessed, and identifying overlaps

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<sup>4</sup> 25 and 26 January 2022; 9 August, 29 September 2022

(See Appendices E(i) and E (ii)). These appendices have been updated in this 2022 HELAA report.

- Provided detailed output through the individual assessments of sites in East Devon submitted through the 2017 and 2021 calls for sites (See the Site assessment profiles in Appendices F(i) and F(ii).) These appendices have been updated in this 2022 HELAA report.
- Set out interim summary results about the amount of potential housing capacity in East Devon identified as available, suitable and achievable (drawn from the assessments of sites submitted through the 2017 and 2021 Call for sites). This analysis has now been superseded by the 2022 HELAA report.
- Part 1 also identified matters where there is still 'work in progress'. The intention is for the outcome of that work to be presented in a forthcoming 2022 HELAA Part 2 report.

4.17 The East Devon HELAA report - Part 1 was therefore an interim report because the analysis, including the supply counts, have now been superseded by new and updated evidence in this 2022 HELAA report.

### **3. The East Devon HELAA Report 2022**

4.18 The Part 1 report indicated that there would be a 2022 HELAA Part 2 report. The intention was to report on the outcomes of HELAA work on:

- The identification, survey and assessment of :
  - Other sources of sites; and
  - The 2<sup>nd</sup> East Devon Call for sites which commenced on 28 March 2022, for a six week period ending on 10 May 2022
- Listings of those additional sites, maps showing their location, and the related detailed site assessment profiles,
- Housing and economic trajectories – forecasting the delivery of available, suitable and achievable sites identified through the HELAA reports – Parts 1 and 2, taking into account any site overlaps to avoid double counting.

4.19 Work proceeded in the summer and early autumn of 2022 to assess the identified sites from the 2022 Call for sites. From 145 submissions this identified 91 new sites and 54 resubmissions. This led the Council to conclude that it was necessary to revisit the analysis of sites from Part 1, due to the amount of overlaps and updating on site availability and proposals. A Part 2 report was not progressed. Instead a combined 2022 HELAA report has now been produced by the Council:

### **4. The combined 2022 East Devon HELAA Report**

4.20 The work for this report final 2022 East Devon HELAA report encompassed

- Updating the Part 1 site assessments. This is reported in the Appendix F detailed site assessment profiles, including the consequences of the overlaps, updated information on site availability, and information from the 2022 Call for sites.

- Producing forecasts of site delivery for housing and employment development (detailed in the site assessment profiles), and including the indicative housing trajectory in Appendix I in this 2022 HELAA report.
  - Updated lists of sites identified (see Appendix E of this 2022 HELAA report – now E(i), E(ii) and E(iii)) together with new lists E(iv) – which lists all sites in parish order; plus E(v).
  - Updated summary tables and conclusions about the potential supply of available, suitable and achievable sites.
- 4.21 The 2022 HELAA report was reported to the Strategic Planning Committee on 1 November 2022, who resolved to agree to the use of this HELAA document as evidence so that it can be published as part of the Local Plan evidence base.
- 4.22 The HELAA 2022 supersedes the previous Strategic Housing Land Availability Assessment (SHLAA) for 2010, 2011 and 2012 which the Council published as part of the evidence base supporting the preparation of the East Devon Local Plan 2013 to 2031.

### **c) HELAA Methodology**

- 4.23 Planning Practice Guidance Housing and Economic Land Availability Assessment (22 July 2019) is very important because it guides the way the Council identified and assessed potential sites and potential capacity, and to forecast delivery. Following the guidance in PPG inevitably resulted in the 2022 HELAA report being a lengthy and detailed document, given the number of sites already identified, and potentially more to assess. The 2022 HELAA report includes an executive summary to highlight the key points.<sup>5</sup>
- 4.24 PPG paragraph 4 indicates what inputs and processes can lead to a robust assessment of land availability. PPG makes clear that the assessment needs to be thorough and proportionate. It expects that the LPA, as a plan-making authority, will have regard to the guidance in preparing and updating its assessments. The Council will need to explain any departure from this guidance in the plan-making evidence.
- 4.25 The 2022 East Devon HELAA report is the latest in a series of HELAA reports covering the district, produced since 2008. It continues the history of working collaboratively to an agreed methodology with the other authorities in the Exeter Housing Market Area, as outlined in the report to the 15 December 2020 Committee<sup>6</sup>.

### **Methodology - 2017**

- 4.26 The 2022 East Devon HELAA work draws on evidence from the HELAA call for sites undertaken in 2017 and the related analysis. It makes use of information already available. The 2017 Call for sites data was used in the collaboratively prepared HELAA undertaken as part of work on the Greater Exeter Strategic Plan (GESP). That HELAA work used a joint methodology agreed by Committee on 21

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<sup>5</sup> This will be added into the final version of the 2022 HELAA report

<sup>6</sup> [5. LocalPlanEngagementReport.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/5-LocalPlanEngagementReport.pdf)

November 2016. The subsequent 2017 HELAA report (including the 83 strategic sites assessments for sites in East Devon) was published as evidence in 2019<sup>7</sup>.

- 4.27 For the purposes of the GESP HELAA, strategic sites were defined as
- In or next to Exeter: a site (or combination of adjoining sites) that is potentially capable of accommodating around 100 or more homes, or that measures around 2 hectares or more and has been promoted in the Call for Sites for economic development or has been identified by the GESP authorities<sup>8</sup> as having strategic economic development potential.
  - Outside Exeter: a site (or combination of adjoining sites) that is potentially capable of accommodating around 500 or more homes, or that measures around 5 hectares or more and has been promoted in the Call for Sites for economic development or has been identified by the GESP authorities as having strategic economic development potential.
- 4.28 The GESP HELAA was prepared in accordance with the Greater Exeter HELAA Methodology (Revised April 2017) (HELAA Methodology), unless otherwise justified in the HELAA report 2019 or its appendices. The HELAA Methodology reflected Government planning practice guidance at April 2017 on how to undertake HELAA.

#### **Methodology – Updated in 2021**

- 4.29 The authorities in the Housing Market Area subsequently amended the joint methodology in 2021 (See Appendix A). This amended methodology was collectively prepared by councils in the Greater Exeter Housing Market Area comprising Mid Devon, East Devon and Exeter, with the addition of Dartmoor National Park Authority. Teignbridge is in the Housing Market Area but Teignbridge District Council produced its HELAA methodology in 2020. The methodology in Appendix A reflects the latest requirements set out in the 2021 NPPF and Planning Practice Guidance, including the updated PPG on Housing and Economic Land Availability Assessment published on 22<sup>nd</sup> July 2019<sup>9</sup>.
- 4.30 Following the Council decision in December 2020 to withdraw from the GESP East Devon District Council is now producing a new East Devon Local Plan. The East Devon Call for site started in January 2021. At their meeting on 22 June 2021, the East Devon Strategic Planning Committee resolved:
- That the proposed next steps and amendments to the HELAA methodology detailed in the report be agreed.
  - That delegated authority be granted to the Service Lead – Planning Strategy and Development Management in consultation with the Portfolio Holder for Strategic Planning to make any further minor changes that might arise from a review of the methodology by the Panel.
- 4.31 That methodology has guided the work of the 2021 and 2022 Call for sites, and the analysis in this 2022 HELAA report. Details of the latest methodology are set out in

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<sup>7</sup> <https://www.gesp.org.uk/evidence/>

<sup>8</sup> East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council, working in partnership with Devon County Council.

<sup>9</sup> Available on the Government's website at [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-and-economic-land-availability-assessment)

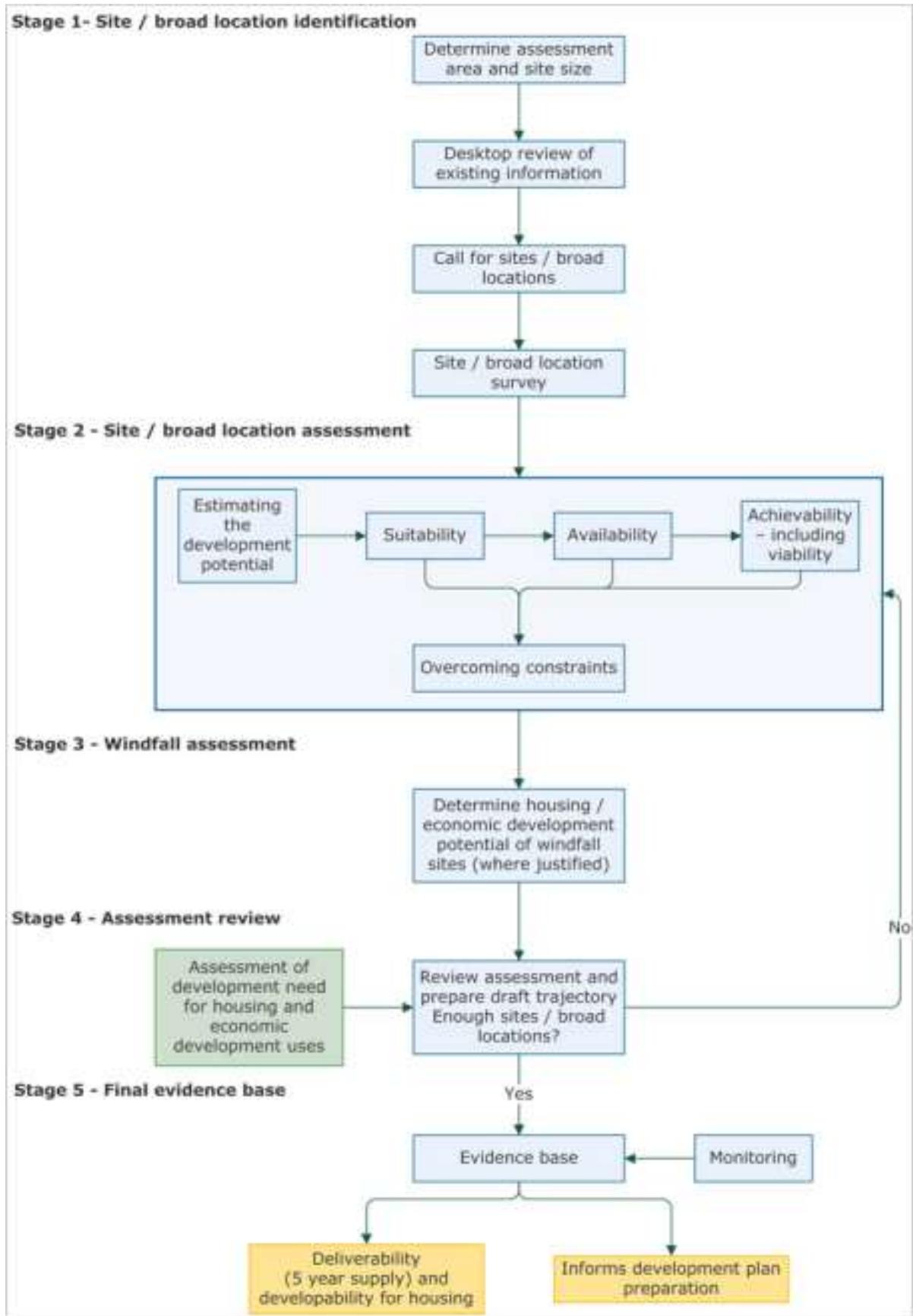
Appendix A to this 2022 HELAA report. The application of the methodology results in a 5 stage process which reflects the Government's Planning Practice Guidance on Housing and Economic Land Availability Assessment (July 2019). The details of how this has been applied is set out in Sections 5 to 10 of this 2022 HELAA report.

## **5.0 Methodology STAGE 1 - Site / broad location identification**

- 5.1 The Planning Practice Guidance on HELAA provides a flow chart which details the inputs and process which should be included to such a robust assessment. The East Devon HELAA broadly reflects the flow chart approach. Diagram 1 below reproduces the flow chart.
- 5.2 Section 4 of this report shows that the main source of information about potential sites in East Devon are the net 636 sites identified from the Call for Sites. This is a very large number of sites for a single district. This scale, together with the fact that the Council has had three Call for sites recently, amply demonstrates that the Council has been proactive. The 2021 and 2022 Call for sites significantly strengthened the evidence used to identify sites to be considered through the HELAA process.
- 5.3 Appendix G lists other types of potential supply sources which the Council should consider. Sites identified from the Call for Sites already include sites from these potential supply sources. Nevertheless, work is ongoing to assess other supply sources such as public sector land, underused land and buildings. Any further sites identified and assessed using the HELAA method will be reported in a future HELAA Addendum report. More on this is set out in this report in the paragraphs about Stage 1 – Desktop Review of Information.
- 5.4 The HELAA analysis is a snapshot. Further work on the Local Plan will be undertaken to consider selection of sites and viability assessment. There will be further information from the Housing Monitoring Update in 2023 and in subsequent years. Additional evidence on site whether sites are deliverable or developable will also inform future sites assessment. Information will be updated as the new Local Plan progresses towards submission. The timing of emerging evidence does not always coincide with HELAA revisions or addendums.

Diagram 1

PPG Housing and Economic Availability Assessment: Methodology Flow chart



5.5 The stages and steps to which this HELAA report relates are as follows:

**1. STAGE 1 - Determine assessment area and site size**

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

**a) Site size threshold**

5.7 The site size threshold is used in Suitability Stage A of the HELAA assessment. The agreed HELAA methodology confirms the minimum site size threshold for sites if they are to pass Stage A of the assessment process and go on to be assessed for availability suitability, and achievability in Stage B, as:

- 5 dwellings (gross) or 0.15 hectares for housing sites
- 500m<sup>2</sup> floorspace or 0.25 hectares for employment led sites.

5.8 Sites below the threshold do not pass Suitability Stage A so do not progress to Stage B of the Suitability Assessment for the HELAA analysis (as set out in the HELAA methodology) and are therefore discounted. This means that their potential supply of dwellings or employment land is counted as NIL. They are however recorded in the list of HELAA sites identified (in Appendix E) to ensure that the HELAA accounts for all identified sites.

5.9 Analysing the smaller sites identified from the 3 Call for Sites highlighted the issue of how to count sites proposed for housing that are just under or over the site size threshold:

- Where available, the Council has relied on submission evidence about the site's availability and the number of dwellings indicated by the submitter. The focus of the HELAA is to identify sites of more than 5 dwellings that proceed to the full suitability and achievability assessment. So even if the site size is more than 0.15 hectares, if the submitter indicated that the site is available for 4 or less dwellings, the site is counted as below the size threshold and does not pass Stage A. (this entailed careful checks on all the data submitted, as the submitters used different fields in the database, as well as information submitted in pdf documents).
- In the event that the submitter has not identified the number of dwellings then the Council uses a formula based on the HELAA methodology (using the gross development area (after discounting eg Flood zone 3 land) and percentage discounts and densities) to calculate the potential number of dwellings. If that falls below five dwellings then the site is unassessed for suitability (Stage B) and for achievability.

## **b) Area for assessment**

- 5.10 PPG HELAA (22 July 2019) Paragraph 6 makes clear that the area selected for the assessment should cover the plan-making area.
- 5.11 To date, the geographical area covered by the current East Devon HELAA is all the land within the council's administrative boundary. As the Local Planning Authority, the Council is responsible for the production of both the emerging East Devon Local Plan and the Cranbrook Plan. The current title of the former implies that it covers all of the East Devon district. The latter relates only to the plan area of Cranbrook. The Cranbrook Plan, is a Development Plan Document (DPD) and the on 19 October 2022 the Council resolved to adopt the plan.

### Sites inside and outside the Cranbrook Plan area

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

- Provide separate counts of supply in the HELAA report Part 1 from identified HELAA sites and other sources for:
  - All of East Devon District; and
  - That part of East Devon District outside the Cranbrook Plan DPD area (i.e. excluding sites wholly within or any area of a site partly within the Cranbrook Plan DPD area).
- Since the HELAA report Part 1 was produced in May 2022, the adoption of the Cranbrook Plan, and ongoing work for the emerging East Devon Local Plan has signalled that further site allocations in the Cranbrook plan area through the East Devon Local Plan is increasingly unlikely. Consequently the counts of potential supply of housing and employment on sites from the Call for Sites that are in the Cranbrook Plan area have been counted as NIL for the purposes of the trajectory. Sites outside the plan area are counted towards potential supply for the purposes of the HELAA trajectory at this time.

## **2. STAGE 1 - Desktop review of existing information**

5.17 Work on the HELAA has been investigating a wide range of potential sites, not just the sites put forward by landowners and developers through the Call for Sites undertaken in 2017 and 2021. A wide variety of sources will be used to identify potential sites.

5.18 Appendix G lists other types of potential supply sources which the Council should consider. Sites identified from the Call for Sites already include sites from these potential supply sources. Nevertheless, work is ongoing to assess other supply sources such as public sector land, underused land and buildings. Any further sites identified and assessed using the HELAA method will be reported in a future HELAA Addendum report.

### **Existing Local Plan Allocations**

5.19 The Cranbrook Plan DPD has just been adopted. Its allocations for housing and employment are counted as commitments and not assessed by this HELAA. Currently, the Council does not intend that the emerging East Devon Local Plan will allocate sites within the plan area of the Cranbrook Plan DPD. Nor will the East Devon Local Plan site proposals supersede allocations in the Cranbrook Plan DPD.

5.20 Only two housing allocations in the East Devon Local Plan 2013 to 2021 have not yet been built or have planning permission, or have not been submitted through the Call for Sites. These two are additional to the net 636 sites identified from the Call for sites. Both sites are owned by the District Council.

- Policy Strategy 26 – c) LAND AT PORT ROYAL SITE, SIDMOUTH Land for residential use is allocated for 30 homes (site ED03) (this site will incorporate mixed use redevelopment to include housing and community, commercial, recreation and other uses). There is now planning permission for change of use of the Drill Hall to a restaurant has been implemented. The rest of the site remains currently allocated in adopted LP for mixed use. However, EDDC Estates has confirmed that the Council still owns that site

but no other uses are being considered for Port Royal and the site was not submitted through the Call for sites. In the absence of a clear indication that the site is available for development, this site is not assessed further for suitability and achievability through this HELAA. It is not counted in the housing commitments.

- Policy Strategy 26 b) LAND AT CURRENT MANSTONE DEPOT – Land for residential use is allocated for 20 homes, site ED01). This has planning permission for new build offices in the south west corner of the site which has been implemented. However, most of the site remains available. EDDC Estates advises that the Manstone site will be probably be considered for housing. However, the site's availability depends on the wider issue of the future of the Council's depots and its wider estate. In the absence of a clear indication that the site is available for development, this site is not assessed further for suitability and achievability through this HELAA. It is not counted in the housing commitments.

5.21 Employment allocations – Any remaining employment allocations potential supply in the East Devon Local Plan 2013 to 2021 are counted as commitments (see Section 9 in this report for further information).

5.22 The Cranbrook Plan DPD allocations have only just been adopted. They all count as commitments. They are not being investigated by the HELAA as potential supply sources for alternative uses.

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

- Planning approval not completed
- DPD site allocations not completed (see paragraphs 5.20 to 5,22)
- Brownfield Land Register
- Withdrawn, refused, live planning applications
- Council identified opportunities: Council assets (Note- the Council submitted several sites for consideration through the 2022 Call for sites)
- Institutional assets and opportunities
- Targeted national non domestic ratings – identified sites
- Vacant residential properties
- Additional potential UCS sites (from the 'left-over space' assessment).

5.24 Work is still in progress to identify which of these UCS sites are not already identified from the HELAA Call for sites or had planning permission by the 2022 Monitoring Point and to assess their availability and achievability. Several sites are too small to pass the site size threshold but the remainder need to be considered

for HELAA, and those identified checked for availability and if available then tested through the HELAA assessment process. The results will need to be set out in a HELAA addendum report.

- 5.25 Further work will also be needed to find out if there are other sites of these types that can be identified within or adjoining proposed settlement boundaries. However, this depends on endorsement of settlement boundaries and the emerging Settlement Hierarchy and spatial strategy that have not already been identified by the HELAA process to date.
- 5.26 Rather than just relying on the current information as being correct and up to date, the council would ideally check data accuracy with agents/landowners/ developers and other interested parties, to confirm that sites remain available and achievable and if the site is correctly identified as deliverable or developable. Paragraphs 4.9 to 4.13 explains how the Council has already undertaken checks on availability of sites submitted in 2017.
- 5.27 One of the challenges of the HELAA work is that each submitter's view of the timing of their site's availability and delivery is from their perspective, not from an overall view of available sites. Submitters are optimistic. Consequently most sites have been indicated as available within the first 5 years. This accounts for the huge spike early in the housing trajectory in Appendix I. The Council has been mindful of PPG guidance on assessing deliverability in years 1 to 5. Consequently, even no supply from sites identified from the Call for sites are counted in years 1 to 5 (currently 2022/3 to 2026/7).

#### Call for Sites

- 5.28 The principal method for identifying sites is a public consultation exercise undertaken by the local planning authority. This may be undertaken jointly with one or more of the partner authorities, or individually. The 'call for sites' is targeted at landowners, agents, developers and town and parish councils to identify sites that are not currently within the planning process. Potential infrastructure requirements and a consideration of viability and deliverability of the submission site must be clearly demonstrated through the call for sites process. Other known sites will be included, such as existing allocations, current/lapsed planning permissions, draft allocations. The 2022 HELAA Reports makes clear which sites were identified from which sources.
- 5.29 To provide a complete audit of available land, the East Devon HELAA aims to identify all sites and broad locations regardless of the amount of development needed. This is consistent with PPG paragraph 8. A robust HELAA assessment can then provide information as part of the process enabling the LPA to identify sites and locations that are most suitable for the level of development required.
- 5.30 It is the LPA's role and responsibility to carry out the processes to identify potential sites which will be assessed by the HELAA. In doing so the Council should also be mindful of NPPF 2021, which expresses the Government's objective towards significantly boosting housing supply, and of paragraph 68 which states:

*Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*

- 5.31 The work of the HELAA requires considerable effort to identify potential sites that can then be assessed using the HELAA methodology. The sources of potential sites and the degree to which the LPA is proactive in investigating those sources directly impact on the number and range of sites that are identified, and the scale of potential supply.
- 5.32 Site identification and assessment needs to be robust, based on the endorsed methodology, consistent with PPG and NPPF.
- 5.33 The next steps in Stage 1 of the HELAA process identify sites and broad locations in East Devon as indicated in the flowchart in PPG (reproduced in Diagram 1 above), from the following sources:
- Desktop review of existing information
  - Call for sites/broad locations (*see details in section 6 of this Report*)
  - Site/broad location survey.
- 5.34 Through carrying out the desktop review, the LPA can demonstrate how it has been proactive in identifying as wide a range of sites and broad locations for development as possible. This includes those existing sites that could be improved, intensified or changed.
- 5.35 The Government's PPG provides a list of the types of site sources that may be particularly relevant (*reproduced in Appendix G.*) Some of the data for East Devon is available, and other data is being gathered, as follows:
- a) East Devon - data available**
- 5.36 The LPA has information at the 2022 Monitoring Point, the latest data available, regarding
- Site allocations in the Cranbrook Plan DPD as at the 2022 Monitoring Point), and the residue of allocations in the adopted East Devon Local Plan 2013 to 2031
  - Housing planning permissions that were unimplemented or under construction in East Devon (the 2022 Housing Monitoring Update). These are considered to be suitable, available and achievable, and will be counted in the HELAA trajectories unless there is clear evidence to the contrary.
- 5.37 The Employment Land Review 2021 provides information on employment development and commitments (Use classes E(g), B2 and B8) with planning permissions that were unimplemented or under construction in East Devon.

**b) East Devon - data being gathered/analysed**

**3. STAGE 1 - Call for sites/broad locations**

- 5.38 In line with PPG, it is important for the LPA to issue a call for sites and broad locations for development if the process to identify land is to be transparent and identify as many potential opportunities as possible. It provides an opportunity for anyone to identify and inform the Council about any land areas that they consider could be appropriate for future development. There can be one or more call for sites on which the HELAA draws.
- 5.39 A Call for Sites enables sites to be identified for assessment in a HELAA that might not otherwise be picked up through a desk-top review by the local planning authority. Sites can be submitted for assessment by any person or organisation and are typically promoted by land owners, developers, agents and local businesses. As part of the Call, the promoter is generally required to confirm that a site is available for development now or at some point in the future, thereby passing the HELAA's test of 'availability'.
- 5.40 To expedite the HELAA process, the Council is making use of the Greater Exeter Strategic Partnership (GESP) HELAA report (2019) which includes assessments of 83 'strategic sites' identified in East Devon. We have also drawn on information about other East Devon sites submitted in 2017, which have now been assessed. Nevertheless it was recognised at an early stage of East Devon LP plan making that it was necessary to undertake another Call for sites in 2021 to increase the amount of potential sites that could be identified. This work was prioritised ahead of the Desktop review of existing information. Since then the 2022 Call for sites requested by the Strategic Planning Committee has also been undertaken. Consequently the 2022 East Devon HELAA report focuses on the sites identified from the 2017, 2021 and 2022 Call for sites.
- 5.41 Sites that have been identified from the Call for sites are shown on Maps in Appendices D(i), D(ii), and D(iii), and as listed in Appendices E(i), E(ii) and E(iii) and their assessments set out in Appendix F (comprising F(i); F(ii) and F(iii)).

**a) 2017 Call for Sites**

- 5.42 A Call for Sites was undertaken by the GESP authorities from late February to early April 2017. The notification was undertaken by the GESP authorities, publicising the Call on the GESP website, the webpages of the GESP authorities and via press release.
- 5.43 Site promoters were able to submit their site information on line. The form available online for submitters to use set out the information sought from respondents, including information evidencing land ownership, and the site area.
- 5.44 The HELAA Methodology was endorsed by the Greater Exeter HELAA Panel, which comprised key stakeholders with an interest in the development of land for housing and economic uses. Further details about the Panel and its role in preparing the HELAA were provided in sections 4 and 6 of the HELAA Methodology and in the

Panel Constitution and Terms of Reference (which are appendices in the 2017 HELAA report). A list of the organisations that sat on the GESP HELAA Panel and were involved in preparing the GESP HELAA is set out in Appendix C of the HELAA report published in 2019.<sup>10</sup>

- 5.45 Of the 359 site submissions in 2017 that were sites within East Devon:
- 83 sites were assessed as ‘strategic’ in the 2019 GESP-HELAA report. 65 of these were for housing or mixed use, including housing. The remainder were for employment uses. . The assessments were published on the GESP website. Generally, these sites have not been reassessed – and the HELAA relies on the assessments published in 2019.
    - 44 of the 83 sites were either resubmitted in 2021 (some with modified site areas and/or boundaries), or indicated that they wanted to participate in the presentations to Strategic Planning Committee in January 2022, and wither stating or implying that the sites remained available.
    - In February 2022, submitters of the other 39 sites were contacted to check whether they remain ‘available’. 31 sites were as remaining available, 4 sites were confirmed as no longer available (sites GH/ED/14, GH/ED/40, GH/ED/77, and GH/ED/78), and 4 sites did not respond although at least one of the latter is now available.
  - 146 sites were not assessed in 2019 and were not resubmitted in 2021. These have now been assessed. Their Site Assessment profiles set out within Appendix F of the part 1 HELAA, has now been updated in light of new information about availability from presentations to the Committee and in light of overlaps with 2022 submission sites.
  - 130 sites were not assessed in 2019 but were resubmitted in 2021 some with modified site areas and/or boundaries. The 2021 sites have been assessed.
- 5.46 Published collaboratively in 2019, the 2017 HELAA report only assessed ‘strategic sites’ put forward in 2017. Those assessments drew on the work undertaken by the four GESP authorities including East Devon District Council, with additional comments from Devon County Council and the Environment Agency, plus the HELAA Panel’s assessment of the achievability of those sites. The District Council has considered the implications of overlaps with sites submitted in 2022, and has added post GESP HELAA comments in the sites assessment profiles in Appendix F in the analysis of the ‘site potential, for the 2022 HELAA report.
- 5.47 The site potential identified for some of the 83 strategic sites from 2017 Call for Sites reflected a GESP approach to aspirational strategic development, rather than the actual availability evidence This 2022 HELAA report has also been the opportunity to rectify this, so that the 2022 assessment of those 2017 submission sites fully reflects their for housing or for employment availability as understood and evidenced during 2022. So some sites that were identified as having employment potential now only shown as having housing potential because they were only

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<sup>10</sup> [Evidence - Greater Exeter Strategic Plan \(gesp.org.uk\)](https://www.gesp.org.uk)

submitted (or updated) as available for housing uses, or at best as housing and some mixed uses..

**b) 2021 Call for sites**

- 5.48 In 2021 the previous call for sites was 4 years old. To ensure that the Council had an up to date picture of available sites across the District, at their December 2020 meeting, Committee authorised a new call for sites to be run alongside the “Issues and Options” consultation January to March 2021, resolving that:
- The timetable and process for future work on the Housing and Employment Land Availability Assessment be approved.
- 5.49 That ‘future work’ included another call for sites. The new ‘call for sites’ was open for submissions from 18 January to 15 March 2021, matching the consultation period for the Local Plan: issues and options stage. In January 2021, the Council notified previous submitters of the new 2021 Call for Sites and invited them to resubmit their sites for consideration. The form and questions available on the website are reproduced in Appendix H of this report. Aimed at a wide audience, the notification was undertaken by the District Council, publicising the Call on the Council’s website, and via press release. That call for sites provided an opportunity for anyone to identify and inform the Council about any land areas that they consider could be appropriate for future development.
- 5.50 The data gathered via an online form, made available throughout the consultation period, utilised IT infrastructure in place, and was administered by Devon County Council. Some sites put forward in 2021 were resubmissions. Others were new sites. The new sites in East Devon needed to be assessed so that they could inform current plan-making.
- 5.51 323 sites were submitted through the 2021 Call for sites, using either the on-line submission mechanism or notifying the Council of their submissions, with officers recording that information in the HELAA database. Of these 323 sites:
- 193 were new sites submitted only in 2021. The site assessments made in 2022 are set out in an Appendix F
  - 130 sites were ‘resubmissions’ having previously been submitted in 2017. Some of these resubmissions had area or boundary changes compared to 2017, which is taken into account in the site assessments made in 2022 – set out in an Appendix F.
  - Some of the 2021 submissions/resubmission have been superseded or overlapped by proposals from the 2022 Call for sites submissions.

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

- 5.52 This Call for sites was requested by the 8 March 2022 Strategic Planning Committee. The Call for sites commenced on 28 March 2022 and closed on 10 May 2022. The information from those sites was not available in time to be included in the 2022 HELAA report – Part 1.

The Council has now assessed the 145 submissions received through the 2022 Call for Sites. They include 91 new sites plus 54 resubmissions of sites submitted in 2017, 2021 (or both). One was withdrawn (not mapped). The Council undertook the suitability and availability assessment for these sites. HELAA Panel meetings held on 15 and 16 September assessed the sites for achievability. The results of these assessments are set out in the detailed site assessment profiles in Appendix F(iii).

**d) Mapping of sites identified from Call for sites**

- 5.53 All sites identified and considered by the HELAA have to be mapped. This had been undertaken using GIS. This includes sites submitted made through the 'call for sites'. Presentation of HELAA site maps is complicated by the sequence of submissions, resubmissions, withdrawals, overlaps and 'cut-outs', that occurred through the first two Call for sites. Sites submitted through the 2nd East Devon Call for sites added to that complexity.
- 5.54 Only 'East Devon strategic sites' from the 2017 Call for sites have site references starting 'GH/ED'. All other East Devon sites identified from the 2017, 2021 and 2022 Call for sites have a site reference with a 4 or 5 letter code (for the parish) plus a 2 digit number code to identify the site (e.g. Axmi\_01).
- 5.55 To date, the location of HELAA sites has been shown on the interactive map available on the Council's website at [Housing and Economic Land Availability Assessment - East Devon](#). In addition, information about the GESP 2017 HELAA strategic sites assessment remains available on the GESP website at in pdf document (Appendix F)<sup>11</sup>.
- 5.56 Where HELAA 2017 Non-GESP sites (i.e. non-strategic) were submitted in 2017 and then resubmitted in 2021 and where the site's boundaries matched exactly, only the top layer (2017) can be seen on the HELAA website's interactive map. For the avoidance of doubt, the 2021 resubmissions have been registered and assessed. The 2022 sites will be added to the interactive map.
- 5.57 In a few cases, site assessment boundaries are not exactly the same as submission boundaries which also show on the interactive map. This is due to either
- Manual entry of the site boundaries using online entry – so the boundaries in 2017 and 2021 are not exactly the same (eg Sidm\_01)
  - An inaccurate boundary from a 2017 submission being superseded by a correct boundary from a 2021 or 2022 resubmission (e.g. Lymp\_07); or
  - A 2017 site already assessed as a strategic site, where a 2021 resubmission has a slightly different boundary but the site has not been reassessed for the HELAA (e.g. GH/ED/72).
- 5.58 Maps of additional sites assessed from the 2022 call for sites are included in this report at Appendix D (iii).

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<sup>11</sup> [Evidences - Greater Exeter Strategic Plan \(gesp.org.uk\)](#)

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

- 5.59 The volume of HELAA work for the 2022 HELAA report is substantial because of the large number of submissions, 827 in total. The challenging work to analyse the information was exacerbated and complicated by the many site overlaps, in whole or part which have had to be identified and the impact assessed. These can be seen by comparing the maps of sites in Appendices D(i), D(ii) and D(iii). The level of complexity can be seen online on the Interactive map<sup>12</sup>. The latter will need to be updated to show the 2022 submissions.
- 5.60 A comparison has been undertaken of each site submitted with other sites submitted either in the same year or in the other years. As the result of this analysis it has been necessary to spell out clearly what was the nature of the overlap(s) on each site, an update this when the implications of sites identified from the 2022 call for sites were assessed.
- 5.61 The overlap conclusions are summarised in the 'overlap description' which is listed in the site lists in Appendices E(i), E(ii) and E(iii). The overlap description is also included in the detailed sites assessment profiles in Appendix F. It has been necessary to indicate what percentage of a site's net developable area for housing should be counted. In many cases the overlap is 100%. In some cases the overlap is partial i.e. more than nil percent and less than 100 percent. The overlaps have been taken into account in the count of potential supply to include in the trajectory, in order to avoid double counting.
- 5.62 The number and nature of site overlaps is potentially confusing, both for understanding the HELAA assessments, and how the counts of supply from potential capacity are used when producing the delivery trajectories. Overlaps are further complicated by the fact that the site boundaries for some 'existing' resubmitted sites were not the same as the 2017 submission. Therefore when assessing the scale of overlap and which site to count:
- For 'non-strategic sites',
    - where there was no change in the land owner, generally the 2021 sites are counted as 100%, and the 2017 site counted as nil (as that part of the 2017 site had not been resubmitted and it is reasonable to assume that the 2017 residue is no longer being promoted as available, and is therefore discounted from the supply analysis.)
    - Where there was a change in land-owner then the 2021 site was counted as 100% and the residue of the 2017 site was counted based on the percentage of the site area.
  - For those GESP 2017 'strategic sites' that remain available,

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<sup>12</sup> [Housing and Economic Land Availability Assessment - East Devon](#)

- Generally, the 2017 site is counted as this was the area assessed in 2017 and counted as 100% unless overlapped by other 2017 sites.
  - Sometimes the 2017 site is counted as NIL and the overlapping 2021 site is counted instead where additional assessment of the 2021/2022 resubmission site was undertaken (for example where a significantly different site was submitted or the amount of housing changed).
  - Where a new site was submitted in 2022, this has been counted as the latest information, and the previous submission sites' potential capacity reduced accordingly.
- 5.63 A small number of sites have planning permission as at the 2021 Monitoring Point (31 March 2021). These are counted as nil for the supply counts, as they will be counted as planning permissions in the housing trajectory. These available sites have not been assessed but are regarded as suitable and achievable because they have planning permission. The work for HELAA Part 2 will assess whether they are deliverable or developable within the plan period for the emerging Local Plan.
- 5.64 A very small number of sites at Cranbrook lie within the site allocation areas of the adopted East Devon Local Plan, or the emerging Cranbrook plan which is at a very advance stage of preparation. Those sites are counted as nil for the purposes of the supply count. Again, they have not been assessed but are regarded as suitable and achievable.
- 5.65 The multiple overlaps of submitted sites is also being taken into account in the HELAA in order to avoid double counting the housing and employment land that is suitable, available and achievable (see Section 7 of this report) and for the calculation of net potential housing and employment land supply and in the trajectories.
- 5.66 It has also been essential to discount 'cut outs', for example where a resubmission site omits an area that now has planning permission.
- 5.67 There are a small number of duplicate sites from 2017 or 2021 which have been discounted eg because the same site has been submitted separately by joint landowners, or by a landowner and an agent or a developer, or twice by the same person through the same call for sites.
- 5.68 It will be necessary to rerun the overlap check and analysis for all additional sites identified through the 2022 Call for Sites and from the other supply sources compared to the 2017 and 2021 sites that are being counted.

#### **Net number of sites identified**

- 5.69 In light of the overlaps, the results of the HELAA assessments and the potential supply identified in those sites comes from:
- 614 sites or parts of sites are available for housing or housing and mixed used development.

- 57 sites or parts of sites are available for employment led development. These have been assessed for suitability and achievability.
- 5.70 In addition, there were 20 sites submitted in 2022 for other/mixed use without specifying the proposed use. These sites could not be tested for site suitability, and the HELAA Panel concluded that a Panel conclusion on site achievability could not be reached, because the proposed use of the site is unclear. Without knowing the intended type of development it is not possible to assess whether there is a reasonable prospect that a development will be developed on the site at a particular point in time in accordance with PPG. The HELAA process is primarily a source of evidence about sites being considered for housing and employment. However, the plan making process still enables sites to be considered for other uses.

#### **4. STAGE 1 -Site/broad location survey**

##### **1) Initial survey**

- 5.71 All sites identified through the 2017, 2021 and 2022 Call for sites for inclusion in the HELAA have been mapped and information about them recorded in sites' databases.
- 5.72 National guidance advises that particular types of land or areas may be excluded from the assessment as long as the reasons are justified. The Council has considered all sites submitted up to 10 May 2022.
- 5.73 Consistent with PPG, work undertaken for the proportionate initial survey in Stage 1 of the HELAA process, has gathered and recorded information about the sites identified through the Call for sites. This initial work helped to resolve inconsistencies in submitted information, gain a better understanding of appropriate type and scale of development, and potential barriers to delivery, plus information of development progress if any on the sites.
- 5.74 The initial survey captured data, focussed on :
- Site size, boundaries, and location;
  - Current land use and character;
  - Land uses and character of surrounding area;
  - Physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities);
  - Potential environmental constraints;
  - Where relevant, development progress (eg ground works completed, number of units started, number of units completed);
  - Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- 5.75 The survey stage relating to the two call for sites took place as follows
- The survey of sites submitted in 2017 occurred in 2 stages:
    - The survey for the 2017 GESP strategic sites was undertaken in 2017/18 as part of the process that resulted in the GESP HELAA report published in 2019.

- The survey for the non-strategic sites submitted in 2017, including those resubmitted in 2021, was undertaken in 2021.
  - The survey stage for new and resubmitted sites submitted in 2021 was undertaken in 2021.
  - The survey stage for new and resubmitted sites submitted in 2022 was undertaken in 2022.
- 5.76 This initial survey stage occurs before the HELAA Stage 2 – Site assessments (see *section 6 of this report*).

## **2) HELAA Methodology Stage A Suitability Assessment**

- 5.77 A site is suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable and mixed communities. A two stage approach is applied to determining whether potential sites are in suitable locations for housing and economic development. The Suitability Stage A assessment is the first of a two-step process for assessing site suitability where
- Stage A is part of the Stage 1 of the PPG HELAA methodology. Stage A assesses sites against fundamental suitability criteria and will discount sites that are clearly unsuitable for development.
  - The second step is part of the Stage 2 of the PPG HELAA methodology. Stage B involves a more detailed assessment of site constraints for any sites not discounted at Step A.
- 5.78 The types of locations considered unsuitable and removed from the process under Stage A are listed in the table in Paragraph 5.13 in the HELAA methodology in Appendix A to this report:

### **a) Stage A - tests**

- 5.79 The site assessments in Appendix F of the HELAA report the outcomes of the assessment for Stage A for housing related to following reasons (*see Appendix A – Methodology for more details*)
- Sites below the site size thresholds (*see paragraphs 5.7.to 5.9 above*)
  - Sites comprised entirely of land within the functional floodplain (3b) – a precautionary approach was applied where there is no data to distinguish Flood Zone 3a from 3b – to exclude sites wholly in Flood Zone 3
  - Sites for more sensitive uses such as housing, which lie within the Exeter Airport Vector (2017 submission sites) *Note –other noise issues are not reasons to automatically exclude a site from consideration at this stage. They may reduce yield at the Stage 2 assessments*
  - Sites that did not accord with strategically appropriate locations as defined by:
    - • The Development Plan (e.g. saved policies, published, submitted or adopted Local Plan)- (*see paragraph 5.81 to 5.85*)

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

#### Noise – Exeter Airport Vector

- 5.80 An additional criterion was included in the Stage A Suitability Assessment for the FESP HELAA relating to Exeter Airport’s 57 Decibel Vector, which concerns noise constraints associated with general airport movements<sup>13</sup>. Residential development within the vector is not suitable due to noise and amenity issues, hence the inclusion of this criterion at Stage A. To ensure consistency between the GESP HELAA 2019 results and this HELAA Report, all the site assessments in Appendix F to this HELAA Report have applied the same criteria. It should be noted that other noise sources and their impacts may be taken into account at the Stage B suitability assessment or the achievability assessment, but have not automatically precluded sites from progressing to Stage B.

#### Strategic policy

- 5.81 Compliance with existing Development Plan policy has not been applied in the assessment criteria, for suitability in this HELAA, to avoid constraining the ability of the HELAA to identify potential sites in the absence of a new plan’s endorsed strategy
- 5.82 At Stage A the suitability assessment of submitted sites includes, consideration of whether or not sites are suitable for potential development in terms of ‘strategic policy’. The East Devon Local Plan spatial development strategy and strategic policies are currently emerging but they have not yet been endorsed by the Council. The stage A assessment for sites identified from the three Call for sites did not apply a spatial strategy/ strategic policy constraint because the preparation of the emerging plans had not reached a stage where discounting the site on strategic grounds could be justified at this time policy. At this stage it is premature for the HELAA to reach conclusions for example on the strategic locational suitability of submitted sites. Consequently the Suitability Assessment – Stage A in this edition of the HELAA has not applied a strategic sieve of sites. This means that more sites passed Stage A and went on to Stage B suitability assessment than if strategic constraints had been applied.

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<sup>13</sup> The vector does take account of additional noise constraints associated with, e.g., engine testing.

- 5.83 When strategic policies are endorsed there will be additional constraints to development that will affect the plan area. Strategic and updated policy requirements will also need to be taken into account, from evidenced housing and economic needs. Constraints and needs include risks associated with climate change and bio-diversity loss, and risks to infrastructure resilience, community health and well-being, and economic prosperity.
- 5.84 When the strategy and policies are endorsed, the Council will need to consider whether to review the HELAA to take a broader view on suitability in order to present the widest range of options for potential development compatible with strategy. Alternatively, the work on site selection for the Local Plan performs a similar role.
- 5.85 In either process, site suitability assessments will be updated as the Local Plan progresses towards submission and suitable locations for future development are defined. This means that some sites that have passed the Stage A Suitability Assessment in this edition of the HELAA may not pass the Stage A Suitability Assessment in future HELAA editions or in the Local Plan allocation site selection process.

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

- 5.86 Sites which do not pass the HELAA stage A (suitability assessment) for the following reasons (see Appendix A -Methodology) are excluded from the PPG Stage 2 Assessment (referred to as HELAA stage B suitability assessment in the Methodology) and subsequent stages. These sites are counted as NIL in the supply counts and trajectories. A site that does not pass Stage A automatically does not pass Stage B in the suitability Assessment.

## **6.0 Methodology STAGE 2 - Site / broad location detailed assessments**

- 6.1 A detailed assessment of site is one of the key components of Stage 2 of the HELAA process set out in the PPG flowchart. All East Devon sites that passed Stage A, (including the 83 GESP 2017 strategic sites ) proceeded to this detailed assessment, unless they already had planning permission or were allocated, or had been superseded by sites resubmitted in 2021 or 2022. Due to the stages in this HELAA some sites were assessed previously for suitability and achievability but have since been superseded or overlapped by other submissions that are being counted.
- 6.2 The key assessments made at this stage are whether the sites are available, suitable and achievable.
- 6.3 The focus at this stage is the detailed assessment of whether sites are:
- Available
  - Suitable
  - Achievable
- 6.4 The detailed assessment of the sites identified from the 2017, 2021 and 2022 Call for sites that passed Stage A Suitability Assessment are set out in Appendix F of this HELAA report. Owing to the number of sites and mindful of the matters which PPG indicates should be considered, even with the use of summaries, the 'site assessment profiles' in Appendix F are substantial. The total volume of details and assessment is therefore huge. This is necessary for the evidence to be robust and consistent with NPPF and PPG. The assessments in Appendix F in the published HELAA are grouped into parishes, and ordered by parish name and then the HELAA site reference number.<sup>14</sup> The sites are not ordered by settlements as this would be a policy interpretation, which needs to await the endorsement of the settlement hierarchy.
- 6.5 Appendix F is broken down into three parts F(i), F(ii) and F(iii). These relate respectively to the 2017 strategic sites, the 2021 and 2017 non strategic sites, and the 2022 sites.

### **1) AVAILABLE**

- 6.6 The HELAA Report identifies which sites from the three Call for sites are available for development and whether they remain available for consideration through the HELAA assessments. A second step relates to when sites will be available, which will help to inform the trajectories, including the housing trajectory set out in Appendix I.

#### **a) Identification of available sites**

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<sup>14</sup> Site assessment profiles are grouped into sites identified through the Call for sites: 2017 GESP strategic sites (in site reference no order); 2017 non-strategic and 2021 sites (sites are ordered by parish and HELAA reference number); and the 2022 call for sites (ordered by parish and HELAA reference number).

- 6.7 The primary source of data to demonstrate that sites are available for development is provided by the submitters of sites, through their information submitted through the Call for sites, or from follow up checks. In response to the question about availability set out in the HELAA form, their information states whether their sites are available for development.
- 6.8 Submitted sites have been confirmed as available for development through the Call for Sites process. This includes evidence demonstrating landownership comes from Land Registry documents provided by the submitters with their HELAA submissions. At this stage the HELAA assumes that this is a sufficient test of availability. However, as the Local Plan progresses towards adoption LPA will undertake further investigation to determine genuine availability, for example by identifying any legal or ownership issues.
- 6.9 The detailed site assessment for each site shows whether a site is available. If a site is not available or no longer available then it is identified as such and is also discounted from supply counts and trajectories (so those sites' counts are NIL).

#### **2021 and 2022 Call for sites data**

- 6.10 To be robust, the HELAA evidence needs to be up to date. The 2021 Call for sites confirmed that 193 new sites identified in 2021 and the 91 new sites in 2022 are available for consideration for development. Likewise the resubmissions in 2021 and 2022 area also considered to be 'available' unless the Council has been notified of the withdrawal of a site i.e. no longer available. This is sufficiently up to date for the purposes of HELAA evidence at this time.

#### **2017 Call for sites data**

- 6.11 The HELAA has drawn on data from the 2017 Call for sites. That data is now 5 years old. The passage of time means that some of the sites may no longer be available. Details of how the Council has addressed and resolved this issue are set out in paragraphs 5.42 to 5.47 of this report, and in the way that the method for addressing overlaps takes the latest submissions into account.

#### **b) Available sites - Deliverable and developable**

- 6.12 The 2017 Call for sites (including the 2022 check on continued availability), and the 2021 and 2022 Call for sites were opportunities to obtain information about the timing of site availability. This is needed to help categorise sites as 'deliverable' (i.e. in the next 5 years) or 'developable' (i.e. in years 6+), consistent with the definitions in NPPF, for the purposes of the housing and employment trajectories and for the 5 year housing land supply assessment as set out in PPG on HELAA.
- 6.13 To help refine the availability assessment, the 2017 Call for Sites process required the promoter to advise on whether a site is available 'within the next 5 years' (2019/20 to 2023/24), or 'within the next 6-10 years' (2024/25 to 2028/29), or 'within the next 11-15 years' ( 2029/30 to 2033/34), or 'in 15+ years' (2034/35 onwards).
- 6.14 To help refine the availability assessment, the 2021 Call for Sites process required the promoter to advise on whether a site is available 'within the next 5 years' (i.e. 2021/22 to 2025/26), or 'within the next 6-10 years' (2026/27 to 2030/31), or 'within the next 11-15 years' ( 2031/32 to 2035/36), or 'in 15+ years' (2036/37 onwards).

- 6.15 The 2022 Call for sites has also requested the same information about the timing of site availability. In this case the time frame has moved forward one year.
- 6.16 Section 9 of this report on the review of the HELAA assessments considers the implications of that information for the purposes of preparing the housing and employment trajectories. This includes taking into account the latest PPG guidance on forecasting supply in the ‘first 5 years’ when considering “deliverability” which results in these sites not be forecast to deliver development until at least 2027/28.

## **2) SUITABLE (HELAA Methodology - Stage B assessment)**

- 6.17 Suitability Stage B is the second step in the two-step process to assess site suitability for the HELAA. The Council as LPA is responsible for gathering and analysing evidence to assess whether submitted sites are suitable for potential development for HELAA purposes.

### **a) Suitability of planning commitments**

- 6.18 As stated in PPG HELAA para 18, sites in existing development plans or with planning permission can generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. This can be informed by a range of factors including the suitability of the land for different uses and by market signals, which will be useful in identifying the most appropriate use.
- 6.19 HELAA Methodology Paragraph 5.15 establishes that planning commitments are to be regarded as suitable for housing or economic development by virtue to their consent or allocation, unless there have been subsequent changes of circumstance which may affect this position, and there is evidence to demonstrate the change.
- 6.20 The source data for planning commitments is provided by the East Devon Housing Monitoring Update (HMU) up to 31 March 2022<sup>15</sup> (i.e. it uses a 31 March 2022 monitoring point). All commitments are counted in the supply trajectory. The commitments include the 4,170 dwellings proposed in the Cranbrook Expansion Areas identified in the adopted Cranbrook Plan DPD policies<sup>16</sup>. Not all sites will deliver all their capacity by 31 March 2040. The trajectory shows which sites’ potential supply is being counted after that date.
- 6.21 As well as the commitments shown in the table in para 3.12 of the HMU, which forecasts to 2031, there are an additional 249 dwellings within the planning commitments as at 31 March 2022 that are expected to be delivered after that date and before the new Local Plan’s plan period end date of 31 March 2040.

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<sup>15</sup> Housing Monitoring Update- Up to 31 March 2022 (August 2022, published October 2022) – Commitments from planning permissions are listed in the table on ‘Sites where there are projections for the rest of the Local Plan period as recorded by the Housing Monitoring database’ in the HMU Appendix. It should be noted that these commitments do not include supply from “Prior Approval” sites.

<sup>16</sup> On 19 October 2022 East Devon District Council resolved to adopt the Cranbrook Plan Development Plan Document.

- 6.22 Having reviewed the HMU evidence, the Council concludes that all planning commitments for housing development in East Devon are suitable for their consented or allocated use for the purposes of this HELAA.
- 6.23 The source data for employment sites is provided by the East Devon Employment Land Review (ELR) Up to 31 March 2021<sup>17</sup> (i.e. it uses a 31 March 2021 Monitoring Point). All commitments are counted in the supply trajectory. The commitments include 18.4 Ha of employment land at the Cranbrook Expansion Areas identified in policies in the adopted Cranbrook Plan DPD.
- 6.24 Having reviewed the ELR, the Council concludes that at this time all planning commitments for employment land development in East Devon are suitable for their consented or allocated use for the purposes of this HELAA. However, work is in progress on the Economic Development Needs Assessment which will include an assessment of existing supply from commitments in the district. When this work is completed and the evidence available for use, it may be necessary to review the suitability of employment land supply from commitments.
- 6.25 Section 9 of this report on the review of the Assessment Review considers the implications of the Monitoring Point commitments information for the housing and employment trajectories. Information about supply from commitments and completions up to the 2022 Monitoring Point is additional to the total potential supply count in the housing trajectory In Appendix I.
- 6.26 Some sites identified for HELAA assessment have since received planning permission for housing or employment uses by the relevant monitoring point or are sites allocations in Development Plan Documents. This has been recorded as a type of “overlap” on the sites’ assessment profiles in Appendix F. To avoid double counting of supply on these sites, the site’s capacity is counted in the commitments total but the Site Assessment Profile capacity is counted as NIL for the purposes of the HELAA trajectory.

**b) Suitability of other identified sites**

- 6.27 Consistent with PPG, when considering constraints to be used in assessing the suitability of sites, the Council considered information collected as part of the initial site survey, as well as other relevant information, such as:
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation
  - Access to services and facilities
  - Safety (primarily related to HSE high pressure gas pipelines and Consultation Zones, and high voltage power lines)
  - National policy
  - Flood risk

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<sup>17</sup> East Devon - Employment Land Review For the year ending 31 March 2021 – Spring 2022 Published June 2022 [employment-land-review-to-year-end-31-march-2021-min.pdf](https://www.eastdevon.gov.uk/employment-land-review-to-year-end-31-march-2021-min.pdf) ([eastdevon.gov.uk](https://www.eastdevon.gov.uk))

- Airport Noise Vector related to Exeter Airport (using the 57db threshold in relation to housing development)

6.28 At this time, as the spatial strategy and strategic policies have yet to be endorsed, the Council is not able to apply evidence and tests to assess other factors indicated in the PPG, such as

- Appropriateness and likely market attractiveness for the type of development proposed (although this is a factor that was considered for the ‘achievability’ assessment by the HELAA Panel)
- Contribution to regeneration priority areas
- Infrastructure requirements (although advice from National Highways and the County Council (highways) informed the ‘achievability’ assessment by the HELAA Panel). Other infrastructure requirements eg for education, health, and utilities will be considerations in the evolution of the spatial strategy, including the settlement hierarchy. They are being taken into account as the Local Plan site selection progresses through the plan-making process.

**c) Suitability Assessment of sites identified from Call for sites**

6.29 The suitability assessment of sites for this HELAA Report focusses on sites identified from the Call for sites:

- The information collected and assessed for the GESP HELAA report 2019 for the 83 strategic sites. The summary information used in the detailed site assessments is set out in Appendix F of that report.
- The EDDC database of constraints, services and facilities. There are also comments received eg from Devon County Council eg relating to Education Minerals, Waste and Highways/access about the non-strategic sites from 2017, and the sites submitted in 2021 and 2022.

6.30 The suitability for potential housing and employment development of submitted 2017 strategic sites has been assessed in accordance with paragraphs 5.13 to 5.14 of the HELAA Methodology. The results of the suitability assessments are presented in the site assessment profiles in Appendix F of this report.

6.31 The suitability assessments of sites identified from the 2017 Call for sites were undertaken by planning officers from the GESP authorities in consultation with statutory bodies<sup>18</sup>, infrastructure providers<sup>19</sup> and other local authority officers<sup>20</sup>.

6.32 The suitability assessments of sites identified from the 2021 and 2022 Call for sites were undertaken by planning officers from East Devon District Council in consultation with other local authority officers and Devon County Council. The

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<sup>18</sup> Environment Agency, Highways England, Historic England, and Natural England.

<sup>19</sup> Including South West Water, Western Power and National Grid.

<sup>20</sup> Highways, Minerals and Waste, Economic Development, Flood Risk, Conservation, Ecology, Environmental Health, Landscape, Archaeology, Education and GI Officers.

suitability for potential housing and employment development of submitted sites has been assessed in accordance with HELAA Methodology paragraphs 5.13 to 5.14.

### **Suitability Stage B – process and tests**

6.33 Databases have assisted in this process of assessing suitability. Nevertheless, the volume of sites required significant work to reach conclusions about the following matters which were used to determine whether or not a site has passed 'Stage B' of the detailed assessment of the suitability of submitted sites for housing and for employment (*details of relevant thresholds are set out in the next paragraph*).

#### **i. 5 key tests**

6.34 This part of the assessment sites identified from the 2017 and 2021 Call for Sites required significant work to reach conclusions about the following matters which were used to determine whether a site has passed 'Stage B' of the detailed assessment of the suitability of submitted sites for housing and for employment:

1. **Is the site an unacceptable distance from a reasonable range of services and facilities?** (The methodology applied in East Devon uses a threshold for housing requiring the site to be within 1600 metres of 4 or more services/facilities, and the threshold for employment for the site is within 1600 metres of a train station or bus route with an hourly or better service, if the sites are to pass Stage B suitability Assessment).. It should be noted that these distances are "as the crow flies". The assessments for this HELAA do not take into account factors such as distance using available footpaths, cycleways or roads. Nor does it take into account factors such as gradients, road/footway surfaces or whether the route is safe and lit (for example when walking to school). These are factors to be considered at later stages of site assessment for plan-making. There are issues about eg education and health services, which are factors that will need to be addressed through the plan's spatial strategy, and informed by the Infrastructure Delivery Plan. The Council is aware that services and facilities do change over time, so will need to continue to monitor and respond to their availability during the plan making process.
2. **Will the site have an unacceptable impact on biodiversity?** (For housing and employment, the threshold means the site being located entirely within a designated biodiversity site *i.e. RAMSAR sites, NNRs, LNRs, Marine Conservation Areas Ancient Woodlands - where the impact on the sites cannot be mitigated. This does not include County Wildlife Sites or TPOs but they may reduce the yield*)
3. **Will the site have an unacceptable impact on heritage?** For housing and employment, the assessment is based on the impact on the significance of individual and 'in combination' heritage assets (*i.e. Listed Buildings, Conservation Areas, Ancient Monuments, Historic Parks*).
4. **Will the site have an unacceptable impact on landscape?** – The assessment records whether the site is within the AONB, but at this stage sites within the AONB are not automatically ruled out.

5. **Will the site have an unacceptable impact on flooding/land/resources?:**  
Sites wholly within Flood Zone 3 did not pass Stage A and are not assessed. Flood risk is addressed further at Stage B, when flood zone 3 land is discounted for the site's gross development area (GDA). Flood zone 2 is also an issue, as the site would need to pass a Sequential Test, and for some uses an Exceptions test. For those sites which pass Stage A, No sites are ruled out on Agricultural Land Classification, flooding or water grounds currently. If the entirety of the site is a designated Local Green Space (NPPF definition) then it is considered unacceptable. If Local Green Space is on part of a site, that area of land is discounted from the GDA. If Devon CC (as Mineral Planning Authority) also object to its inclusion on minerals or waste grounds then it is also unacceptable (but see paragraphs 6.34- 6.35 below).

6.35 The Site Assessment Profiles in Appendix F summarises the assessment for Failure on any one of the 5 suitability tests results in the site not passing the overall suitability test and not passing Stage B (where the failure is recorded as "No"). Appendix E – list of sites also shows whether sites pass/do not pass the Stage B Suitability Assessment (as well as availability and achievability for housing and for employment).

ii. **Devon County Council comments**

6.36 Additional comments on education, highways, minerals and waste matters, including some key infrastructure matters, are provided by Devon County Council, which informed the HELAA Panel consideration of sites.<sup>21 22</sup>

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

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

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

iii. **Safety**

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

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<sup>21</sup> This may have been also captured in some sites' suitability assessment

<sup>22</sup> Natural England, Historic England and the Environment Agency were also invited to participate on the Panel as a means to inform the HELAA process, but declined.

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

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

- 6.40 Generally, it has not been necessary to reassess the strategic sites suitability which had been assessed in 2017. This includes those strategic sites where sites resubmitted through the 2021 Call for sites had minor boundary changes. Those assessments are therefore available to be combined with the Information about sites in East Devon put forward through the 2021 call for sites.
- 6.41 Whilst the 2017 ‘Strategic sites’ were not reassessed for suitability and achievability they were checked on their availability in February 2022, through contacting the submitters or their current agents and receipt of emailed responses. They were also checked for submission availability for the type of use, so that their availability reflect the uses proposed in the original submissions, unless recent information provides other evidence about the proposed use. They were also checked for overlaps with resubmitted sites and the decision about the percentage of site to count for the supply count is included in the list in Appendix D(i).
- 6.42 The other, non-strategic sites put forward in 2017 were not assessed for the GESP HELAA in 2019. Therefore it was necessary for the 2022 HELAA report to assess the 2017 non-strategic East Devon sites so that their assessments can be taken in to account, in order to inform plan-making. This is in line with the Strategic Planning Committee’s resolution in December 2020 to assess the smaller sites submitted into the GESP call for sites in 2017, to ensure that the Council has an up to date picture of available sites across the District.

**v. Mitigation**

- 6.43 PPG indicates that the Council should consider or reconsider mitigation options reconsidered to test if potentially suitable sites could deliver more.
- 6.44 For this HELAA If the suitability assessments (stage 2B) identify specific local circumstances that indicate the net developable area and density assumptions are not appropriate. The HELAA analysis has not undertaken a brief analysis of the site and surrounding area would need to be undertaken to identify more suitable assumptions. This is because the emerging strategy and local plan policies have not yet been endorsed.
- 6.45 This type of analysis would be part of the work for the site selection process for plan-making. The analysis would relate to the character of the site, surrounding built form, landscape and other natural features with the aim of producing an estimate of the density that would be achievable and appropriate for the site. This approach

would also take account of the need for measures to avoid, reduce or mitigate potential impacts of development (e.g. green infrastructure to provide a landscape buffer). Where measures are required that are likely to have a significant impact on the net developable area, the contextual approach might be used in conjunction with an urban design approach (in order to assess the overall appropriate developable area. The contextual approach may be most appropriate in rural settlements or on the edge of urban areas where reduced densities and/or site areas would be required to mitigate potential impacts on the built and natural environment. As part of this approach, mitigation might be set out as requirements in local design codes.

6.46 Alongside potential impacts, the suitability assessment or the site selection process can provide opportunities for improvements to the site and surrounding areas for example:

- Enhancement of biodiversity and habitat restoration (e.g. Nature Improvement Areas).
- Enhancement of heritage assets (designated and undesignated).
- Provision of green infrastructure and open space.
- Provision and enhancement of walk/cycle routes, the access network (public rights of way and access land), and other infrastructure.
- Regeneration of previously developed land, including derelict or under-utilised sites.
- Improve sustainability of existing neighbourhoods and settlements (e.g., through provision of new neighbourhood facilities or employment opportunities).

vi. **Site Visits**

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

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

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

c) **ACHIEVABLE (HELAA Methodology)**

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

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

i) **HELAA Panels**

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

**Panel Constitution, Terms of reference, Membership**

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

6.53 Membership of the panel is representative of the broad cross-section of the housing and economic development sectors, including house builders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations. District Councillors participated in the East Devon HELAA Panel meetings.

**Panel Role**

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

6.55 It has been the role of the HELAA Panels to use their knowledge and experience of housing and economic development in the East Devon area to advise the LPA on the achievability of submitted strategic sites. In doing so, the Panel has taken into account any constraints to development identified in the suitability assessments, the information provided by promoters on the timing of site availability, potential planning policy requirements (e.g. affordable housing and open space), the current planning status of sites and local knowledge

6.56 The latest agreed joint methodology for the HELAA includes provision for a Panel to provide opinion about the HELAA methodology and the achievability of sites. The Panel comprises key stakeholders who have a recognised interest and experience in the development of land for housing and employment. They participate on a voluntary basis.

6.57 Using a HELAA Panel to consider sites' 'achievability' is promoted by PPG but not mandatory. The Panel process has been successful in the production of past

HELAAAs in this area. The Panel constitution and terms of reference was previously jointly adopted in 2016 by the authorities in the Exeter housing market area. These have been used to regulate the formation, structure, role and operation of the panel since then. A common approach to HELAA production across the Exeter housing market area is considered to be sensible in terms of use of resources and mindful of the duty to co-operate.

#### **ii) 2017 Call for sites HELAA Panel**

- 6.58 A HELAA Panel met in 2018 to consider the strategic sites identified from the 2017 Call for sites. Their conclusions on the potential achievability of the 83 strategic sites in East Devon were set out in the GESP HELAA report (2019), and are reproduced in an Appendix in the East Devon HELAA report. Those achievability conclusions have generally not been revisited because specific issues about individual sites' are unlikely to have changed significantly in the last 5 years, although the wider economic context continues to evolve. Information about the 83 sites' availability has been updated, and this is taken into account in the calculations about potential supply which will inform the trajectories. Likewise a small number of potential capacity assessments have been modified eg to take account of gas pipelines and their consultation zones.
- 6.59 Where submitted strategic sites adjoined each other, the HELAA Panel assessed achievability across the sites as a whole rather than on an individual site basis. This was because some submitted strategic sites only qualify as 'strategic' on grounds that they adjoin other submitted sites. The Panel assessed the achievability of standalone submitted strategic sites on an individual basis. The approach taken to assessing the achievability of each site was clarified in Appendix F to the GESP HELAA report.
- 6.60 The results of the GESP HELAA achievability assessment were reported in the Site assessment profiles in Appendix F to the HELAA Part 1 report.
- 6.61 The achievability conclusions about these 83 sites have not been revisited, but an update on current availability, and a focus on the use proposed in the submission has been undertaken in 2022, which resulted in changes to the site potential capacity and the count of potential supply for the trajectory. This is recorded in the site potential assessment in Appendix F(i).

#### **iii) 2021 Call for Sites HELAA Panel**

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

#### **Updated HELAA Panel constitution and Terms of Reference (2021)**

- 6.63 For the avoidance of doubt, the 2021 East Devon HELAA is the responsibility of East Devon District Council. The HELAA Panel's role is advisory, focused on the HELAA methodology and on assessing the 'achievability' of submitted sites.

- 6.64 On 22 June 2021, Committee resolved that further information on the composition of the HELAA panel is brought back to Committee before the HELAA panel's first meeting to be set out including the role of local Members on the Panel. At their meeting on 7 September 2021, Members subsequently considered the revised constitution and terms of reference of the HELAA Panel. The revisions were minor, reflecting recent changes to PPG. Committee resolved:
- To agree the constitution and terms of reference of the HELAA Panel (including the minor changes reflecting recent changes to PPG)
  - To appoint the Portfolio Holder for Economy and Assets and the Portfolio Holder for Strategic Planning onto the HELAA Panel
  - To agree to delegate authority to the Service Lead – Planning Strategy and Development Management in consultation with the Portfolio Holder for Strategic Planning, to make any further minor changes that might arise from a review of the panel's constitution and terms of reference by the Panel.
- 6.65 Following this, the Panel constitution and terms of reference was shared with partner authorities in the Exeter Housing Market Area. They are reproduced as Appendix B in this HELAA report. EDDC officers identified potential participants for the categories as set out in the constitution, and shared this with the partner authorities. The potential participants were invited to participate in the HELAA Panel. Most accepted the invitation, replacements were sought for those who didn't accept, where possible.
- 6.66 It should be noted that Natural England, Historic England and the Environment Agency declined or didn't respond to the invitation to be Panel members. Whilst they have not actively engaged at this early stage of evidence production, they will still have the opportunity to respond to the plan-making consultation stages.

#### **2021/2022- Panel meetings held**

- 6.67 The East Devon HELAA Panel inception meeting (virtual), held on 21 October 2021, agreed the HELAA 2021 Methodology and confirmed the Panel constitution and terms of reference.
- 6.68 Four virtual Panel meetings were then held in 2021/22 to discuss sites. Prior to those meetings, the Panel received information about the sites, prepared by EDDC officers. To make the Panel meetings manageable, three Panel meetings were held in November and December 2021 to discuss all the large identified housing sites. Due to the high number of smaller housing sites, officers suggested achievability conclusions, and at the last December meeting the Panel discussed only those sites where they queried the suggested conclusion. A fourth Panel meeting was held in January 2022 to consider the 38 identified employment led sites from the 2017 and 2021 Call for Sites.
- 6.69 Two further virtual Panel meetings were held in 2022 to consider the achievability of sites identified from the 2022 call for sites, using the same approach as for the four previous meetings.

#### **Panel assessment of Achievability – 2021/2022**

- 6.70 The 2021 and 2022 HELAA Panel conclusions about achievability are recorded in the detailed site assessment profiles in Appendix F to this HELAA Report.
- 6.71 Submitted sites that have not passed the achievability assessment (recorded as category 'probably unachievable' or 'probably unachievable unless' do not pass the achievability test. They are then given a 'NIL' capacity yield for the purposes of the trajectory, and this is shown in the "site potential" summary in the detailed assessment of proposed development in Appendix F, and for housing this is shown in the trajectory in Appendix I.
- 6.72 The East Devon 2021 and 2022 HELAA Panel assessed achievability on an individual site basis. Owing to the large number of sites:
- EDDC officers suggested achievability assessments for small sites and circulated this to the Panel members before the relevant Panel meeting asking them to identify any sites where they disagreed with the suggested assessment before the meeting. The Panel then
    - Considered those sites and where they reached a different conclusion to that suggested, it is the HELAA Panel conclusion that has been recorded in the site assessment profiles in Appendix F of this report.
    - Where the Panel agreed with the suggested small sites achievability assessment, the conclusions are recorded in the site assessment in Appendix F of this report.
  - The 2021 and 2022 meetings of the HELAA Panel considered all the large sites identified through the 2021 Call for sites. Their conclusions are recorded in the site assessment in Appendix F of this HELAA report.
  - Whilst there was consensus on most sites about the Panel conclusion on achievability, where there was a minority alternative view, this is recorded in the Panel conclusion.

### **Categories of Achievability**

- 6.73 The HELAA analysis uses four categories of achievability conclusions:
1. Probably achievable
  2. Probably achievable if (usually one or more mitigation measure that are likely to be necessary but would probably still leave the development viable)
  3. Probably unachievable
  4. Probably unachievable unless (usually one or more mitigation measure that are likely to be necessary but would probably be of such a magnitude or cost that they would: make the development unviable; or require a level of evidence that is either not available at this time, or are unlikely to become available; or eg require third party land across several ownerships not in the control of the site submitter.)
- 6.74 Counts of potential capacity/supply that are 'achievable', which are set out in this HELAA report, are based on the two categories of "probably achievable" and "probably achievable if".

## 7.0 Methodology STAGE 2 - Assessing site development potential

- 7.1 The work to produce this 2022 HELAA report reflects the latest Planning Practice Guidance on HELAA. This includes guidance on the assessment of the development potential of each identified site that is assessed at Stage 2 of the HELAA process.

### **Development potential of planning commitments.**

- 7.2 For planning commitments, the HELAA assumes that a site's development potential is the same as the number of homes for which consent has been granted or for which the site is allocated in an existing adopted plan. This is counted at the 2022 Monitoring Point for housing and the 2021 Monitoring Point for employment (the relevant monitoring points for the latest published Housing Monitoring Update and the Employment Land Review for the district). The Cranbrook Plan DPD had not been adopted at that stage, but was very advanced, and the Council resolved on 19 October 2022 to adopt that DPD.

### **Development potential of all other sites assessed at Stage 2**

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

#### **1. Gross to net ratio**

- 7.5 **First, the gross development area of a site is calculated.** The gross development area is taken to be the whole of the site area of the submitted site, as measured by the GIS mapping of a site, for a development excluding any unsuitable land identified at STAGE A of the HELAA assessment. This may be further adjusted following STAGE B of the HELAA assessment. The gross development area is recorded in the Site assessment profile for each site set out in Appendix F to this HELAA report.
- 7.6 **Then the net developable area is calculated for housing.** The net developable area is taken to be the residue of the gross development area site area which remains for the delivery of the development considered. For housing or employment uses, this can include buildings for these uses, garages, gardens, driveways, amenity space, service/estate roads, parking areas, children's play space, local centre amenities (shops) and incidental green space (Space Left Over After Planning). The net developable area is what area remains after subtracting other required land uses such as highways infrastructure, sports pitches, allotments,

parks, Sustainable Urban Drainage Systems (SUDS), schools and other infrastructure requirements.

- 7.7 To reflect the realistic developable site area, indicative 'gross to net ratios' will be applied to all sites. Exceptions to this rule will only be acceptable where evidence justifies an alternative ratio (such as through testing against similar locations) or on advice from the HELAA Panel.
- 7.8 At this early stage, the HELAA used a calculation to reduce the gross site area by a percentage ratio to calculate the net developable area. The percentage ratio is dependent on the location type and the submitted site's total site size. The percentages for housing and employment are set out in the Table in paragraph 5.9 on the HELAA methodology in Appendix A to this HELAA report.
- 7.9 **For employment sites, only the gross development area is used** (see Appendix A Methodology – paragraph 5.10).

## 2. Density

- 7.10 The Methodology report – Paragraph 5.11 sets out the second part of calculating potential capacity which requires that a density assumption is applied to the net developable area. Table 5.11 sets out the assumptions which depend on the type of location.
- 7.11 Most of the 83 GESP strategic sites use the 31-40 dwellings/ha assumption, because of the strategic scale and location of the sites.
- 7.12 Most of the 2021, 2022 and the other 2017 submitted sites are suburban/rural settlements- type locations. Whilst the table in paragraph 5.11 of the Methodology indicates a density of 20-35 for that location type, paragraph 5.11 does allow the LPA to vary this assumption. At this early stage the LPA considers that it is prudent to use a density assumption of 20 to 30 dwellings per hectare (with a mid-point of 25 dwellings/ha) for the HELAA report at this stage of the HELAA process. This is prudent because the volume of sites to be assessed has been particularly challenging in terms of considering site specific constraints such as local housing densities in settlements in this rural area. Although sites need to make efficient use of land, over estimating density at this stage could be problematic if subsequent site design were to result in fewer dwellings that lead to insufficient sites being considered for the site selection process.
- 7.13 The volume of sites to be assessed has been particularly challenging in terms of considering some site specific constraints at this stage such as steep slopes, noise and air quality impacts, and local context such as design and character.
- 7.14 Furthermore, on sites promoted for mixed use, the HELAA methodology formula for calculating potential housing yield does not make a specific adjustment for employment uses. Such an adjustment would reduce the housing yield but the balance of housing to employment uses needs further information and policy input which is not yet available. It is important not to pre-empt emerging Local Plan strategy and policy decisions at this stage of the HELAA process.

- 7.15 More information about site characteristics will be sought that will help to inform site design work and analysis as the Local Plan progresses towards adoption, which will probably change potential site capacities.
- 7.16 The Council has taken a further pragmatic approach to avoid over estimating site potential housing yield/capacity at this stage, by taking into account the submitters' assessments of potential housing capacity, which will have been informed by local site characteristics. The site assessment profiles in Appendix F record the upper figure of potential capacity provided by submitters (where provided and where clear). For the 2021, 2022 and the non-strategic 2017 sites, the detailed profile records whichever is the lower of the submitter's potential capacity or the net developable area.
- 7.17 Finally, the site potential capacity based on the lower of: the submitter's potential capacity or the net developable area is moderated by the percentage of site to count to avoid site overlaps.
- 7.18 The assessed site development potential is the data source about yield to include in the calculations of supply for the trajectories, reported in this HELAA Report, notably in Appendix I.
- 7.19 The site potential capacity may change in the future as further information about a site becomes available and additional assessments undertaken.
- 7.20 Some of the site capacity on sites may not be wholly delivered in the plan period. This is considered further in Section 9 of this HELAA report.

## **8.0 Methodology STAGE 3 - Windfall Assessment**

- 8.1 The PPG flowchart includes a stage for determining the housing and economic development potential of windfall sites (where justified).
- 8.2 The windfall housing assessment for East Devon relates to the 18 years from the 2022 Monitoring Point to the end of the emerging Local Plan's plan period. That is, from 1 April 2022 to 31 March 2040. No windfall delivery is forecast in the first two years in that period, to avoid overlaps with existing commitments. After that time the level of windfall forecast is based on the latest average rate of 158 windfall dwellings completions per year, but moderated by the need to take the forecast of existing windfall commitments into account, to avoid the total exceeding the 158 per year average.
- 8.3 The approach to windfall projections is based on that used by, the East Devon Housing Monitoring Update explained in paragraphs 3.6 to 3.11. This forecasts windfalls to 2031. The HELAA assumes that the average rate of 158 per year will then apply to the end of the plan period for the emerging Local Plan i.e. up to 31 March 2040. In light of the HMU evidence the Council considers this is a reasonable windfall allowance. At this time the Council has no evidence to justify a different windfall allowance rate.
- 8.4 The windfall forecast for housing for the individual years between 2022/3 and 2030/31 is set out in the 2022 East Devon Housing Monitoring Update in the tables in paragraph 3.9 and 3.12. The 'low' forecast figure of 46 windfall dwellings in In 2027/8 is a direct consequence of the PPG methodology towards forecasting delivery on outline planning permissions, which means that sites that might be expected to start to deliver in 2025/6 and 2026/7 are not counted until after the 5 year period i.e. in 2027/8 in order that they are counted as developable.
- 8.5 The total number of dwellings in the windfall allowance for the period 2022 to 2040 is 2,335 dwellings. This is shown in the illustrative housing trajectory in Appendix I of this HELAA report.
- 8.6 At this point in time the HELAA has not forecast of potential windfall supply allowance for employment sites.

## 9.0 Methodology STAGE 4 – Assessment Review

- 9.1 This section of the report summarises the main findings of this HELAA Report.
- 9.2 Once the sites and broad locations have been assessed, PPG states that “the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be made as to whether sites will come forward as anticipated”.
- 9.3 The PPG flowchart includes a stage for an assessment review, in two parts, as follows:
- a) Assessment of development need for housing and economic development uses
  - b) Review assessment and prepare draft trajectory - Enough sites/broad locations

### Housing Need

- 9.4 The Council has evidence of the level of housing need in East Devon for the plan period for the emerging Local Plan. The evidence is provided by the East Devon Local Housing Need Assessment<sup>23</sup>. Based on the latest ONS affordability statistics and the Government’s standard Methodology, the level of need is 946 dwellings per year (equating to 18,920 over the 20 year plan period). Preparation of the emerging Local Plan is considering the scale of housing requirement to be set out in policy, but this has not yet been endorsed at this time. At this time PPG allows the potential housing supply from available, suitable, achievable sites forecast for potential delivery in the plan period to be compared to the level of forecast need for the plan period.

### Employment Need

- 9.5 Work is in progress on the Economic Development Need Assessment, but the results are not yet available. At this time the HELAA cannot reach a conclusion about whether employment land forecast for potential delivery in the plan period could meet need, because the scale of employment need has not yet been identified or accepted by the Council as evidence for plan making.

### Assessment review.

## HOUSING

- 9.6 A previous initial review of the assessed potential supply was set out in the HELAA Part 1 report. This report was noted by Strategic Planning Committee in May 2022. That Part 1 report explored the impact of a step by step analysis of potential housing supply starting with available sites and then looking at the impact of discounting supply because sites were not suitable and then discounting sites that

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<sup>23</sup> East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment: Report of Findings for East Devon September 2022 [East Devon, Exeter, Mid Devon and Teignbridge Local Housing Needs Assessment 2022](#)

were not achievable. The purpose was to demonstrate how each aspect reduced potential supply and to indicate the amount of potential supply that was available suitable and achievable

- 9.7 That preliminary assessment of potential housing supply has now been wholly superseded by the evidence and analysis in this HELAA 2022 Report.
- 9.8 The HELAA methodology only requires that the assessment of development potential for housing and employment uses simply identifies which sites are available, suitable and achievable for the purpose.
- 9.9 Table 1 summarises the total potential supply from East Devon sites identified and assessed as available, suitable and achievable including completions, commitments, Cranbrook DPD expansion areas and windfall allowance.

**Table 1 Assessed supply – Net Dwellings from identified sources**

Potential net supply of dwellings identified from supply sources in East Devon	No of Dwellings (approximate)
Available Suitable and Achievable Sites from the Call for Sites	27,088
Completions 1 April 2020 to 31 March 2022	1,906
Commitments at 31 March 2022	4,389
Cranbrook DPD	4,170
Windfalls allowance	2,335
<b>TOTAL</b>	<b>39,888</b>

Source: Appendix I – Indicative Housing Trajectory in this HELAA report

- 9.10 At 39, 888 dwellings the total potential supply is significantly above the 18,920 local housing need for East Devon.
- 9.11 The assessment of 27,088 dwellings (approximate) on sites identified as available, suitable and achievable for housing includes 1,034 dwellings on sites. Those 1034 dwellings are on sites which were submitted as available through the 2017 Call for Sites, but where no confirmation has yet been received that they remain available. If these 1,034 are omitted from the ‘available’ supply then the forecast supply from the category of ‘Available Suitable and Achievable Sites from the Call for Sites’ falls to 26,054 and the District total falls to 38,854 dwellings.
- 9.12 The scale of potential housing capacity does not imply that all of the land on sites identified as ‘available, suitable, and achievable’ will be allocated in the Local Plan. Further work is being undertaken by the Council through the site selection process to identify sites for housing or mixed use (including housing) allocations in the Local Plan, as the plan progresses to publication stage, and then towards adoption.

## Five year housing land supply

- 9.13 Table 2 provides an interim five year housing land supply based on years 1 to 5 in the indicative trajectory in Appendix I

**Table 2 Interim five year housing land supply as at the 2022 Monitoring Point.**

Stage	Calculation	Result	Item
A		946	Local Housing Need annual rate from Standard Method (Local Housing Need Assessment September 2022)
B	Ax5	4,730	Basic five year requirement
C	Ax2	1,892	Requirement to have been delivered by 31 March 2022
D		1,906	Completions from 01 April 2020 to 31 March 2022
E	C-D	-14 SURPLUS	Difference between shortfall and surplus
F	B+E	4,716	Five year requirement (excluding 10% buffer)
G	F x 1.1	5,188	Five year target (including 10% buffer)
H	G/5	1,038	Annual target assuming 10% buffer
J		4,783	Forecast net total housing supply for years 1 April 2022 to 31 March 2027 – HELAA Appendix I
K	G-J	405 SHORTFALL	Surplus/Shortfall
L	J/H	4.61	Years of land supply (assuming a 10% buffer)

- 9.14 The 5 year housing land supply in the HMU applies a 5% buffer because the housing delivery test for East Devon has been met over the past three years (see the table in paragraph 4.3. Unlike the HMU 5 year housing land supply, the 5 year land supply assessment for the HELAA in Table 2 assumes a 10% buffer to reflect PPG HELAA for plan-making purposes.
- 9.15 For the avoidance of doubt, Table 2 does not supersede the HMU 5 year supply calculations for East Devon district for development management purposes.
- 9.16 The Council already undertakes work on to forecast the delivery of housing commitments, consistent with PPG. The Council will be extending that work to encompass the forecast of the emerging sites selected for allocations when they are identified. This is expected to be combined with the forecasts from commitments at the 2023 Monitoring Point, and be undertaken in 2023, as part of the PPG approach to identifying and maintaining a rolling five year supply of deliverable housing land to ensure the continued supply of homes in the area. The Council is particularly mindful of the guidance in PPG HELAA Paragraph: 007 Reference ID: 68-007-20190722.

## Gypsy and Travellers and Travelling Showpeople

- 9.17 Work is in progress on the production of the East Devon Gypsy and Travellers Accommodation Assessment. This evidence is still in preparation, and therefore there is no up to date evidence at this time confirming the level of need in the District.
- 9.18 There has been a long standing challenge of identifying sites in East Devon for accommodating these needs. Very few past submissions have promoted land for this sector of our community. The 2022 Call for sites was an opportunity to encourage submissions. Only 4 new sites were submitted.
- 9.19 Table 3 identifies the sites which were identified in the submission as available for Gypsies, Travellers and Travelling Showpeople sites. The suitability and achievability assessments are based on a general assessment of the site for housing as this HELAA has not assessed the site in terms of specific types of housing need.

**TABLE 3 : SITES SUBMITTED AS AVAILABLE FOR GYPSY, TRAVELLERS AND TRAVELLING SHOWPEOPLE USE**

Site ref	Site address	Available, Suitable Achievable	Net Developable Area (Hectares)
Cotl_01	Land and Buildings at Three Mariners Farm, Cotleigh, EX14 9HP	No	0
Brcl_26	Ash Piggery Langaton Lane, Pinhoe, Exeter EX4 8QE	Yes	1.11
Buck_02	Crosshill Farm, HONITON, EX14 3PF	No	0
Memb_01	Land to the Rear of Old Post Office (Land Registry Title: DN2328) Membury, Axminster, EX1	Yes	0.9
Whim_18	The Field Between Orchard Lea and Church Road, Church Road, Whimble, EX5 2TF	Yes	0.79
Widw_04	Sedgeley, HONITON, EX14 9JR	Yes	1.87
GH/ED/40	Land adjacent Tunnel Lane, by Middle Northcote Farm, Honiton	No Withdrawn	0
<b>TOTAL</b>			<b>4.67</b>

- 9.20 Only 7 sites were identified as available for sites for Gypsies, Travellers and Travelling Showpeople. One at Honiton has since been withdrawn, reducing the total to 6 potential sites.

- 9.21 Only 4 sites are identified and assessed as available, suitable and achievable. All 4 sites were also identified and assessed as available for housing. They are counted in the potential housing supply in Table 1.

### **EMPLOYMENT**

- 9.22 Table 4 summarises the assessment of the potential supply of employment land in hectares on Employment-led and Mixed Use sites, including completions, commitments, and the Cranbrook DPD Expansion Areas. At this time no windfall allowance has been included because work is still in progress on the Economic Development Needs Assessment and the related assessment of supply.
- 9.23 Details of the forecast supply by parishes and sites are listed in Appendix J.

**TABLE 4 POTENTIAL NET SUPPLY OF EMPLOYMENT LAND (HECTARES) IDENTIFIED FROM SUPPLY SOURCES IN EAST DEVON**

	Comple tions in East Devon *	HELAA FORECAST SUPPLY POTENTIAL (Hectares) -- Approximate				Post plan period	TOTAL
		Years 1-5	Years 6-10	Years 11-15	Years 16-18		
Available Suitable and Achievable Sites from the Call for Sites	0		151.2	152.32	20.15	0	<b>323.67</b>
Completions	1.9	0	0	0	0	0	<b>1.9</b>
Commitment s and allocations**	0	33	25	25	12.45	0	<b>95.45</b>
<b>TOTAL</b>	<b>1.9</b>	<b>33</b>	<b>176.2</b>	<b>177.3</b>	<b>32.6</b>	<b>0</b>	<b>421.02</b>

\* Including 2017 submission sites without 2022 confirmation of continued availability

\*\* This includes 18.4 Hectares in the Cranbrook Plan Area

- 9.24 PPG requires the Council to assess the potential supply of employment land that is suitable, available and achievable. From sites identified from the three Call for Sites, the Council estimates that there potentially 323.6 hectares of land on sites that are suitable, available and achievable.
- 9.25 With 323.6 hectares of land on sites that are available, suitable and achievable from the 3 Call for Sites added to the 97.35 hectares supply from 2020/21 completions and commitments plus net Local Plan allocations (including the 18.4 Ha at Cranbrook Plan area, but excluding 8 Ha at Axminster East which is being counted as potential under sites GH/ED/81 and GH/ED/82) there is substantial potential employment land supply (421 Ha) in East Devon in the plan period.

- 9.26 Again, this scale of potential supply is substantial. It is likely that this is much more than needed. The supply potential will be reduced through the site selection process as the spatial strategy and local plan policies are applied. Some of the sites are for mixed use. Some of this land is also land which is available and counted under the housing supply assessment.

### **Trajectories**

#### **HOUSING**

- 9.27 PPG requires the HELAA report to include an indicative HELAA Stage 4 housing trajectory, to forecast completions of housing development within East Devon, for sites that are available, suitable and achievable, and for other supply sources including completions, planning commitments, the Cranbrook DPD Expansion Areas, and the windfall allowance.
- 9.28 Sites assessed as having housing development potential by the HELAA take into account likely delivery rates in order to produce a housing trajectory. This informs the calculation of an indicative 5 year housing land supply East Devon for HELAA purposes.
- 9.29 As explained in paragraphs 7.2 to 7.4 of the HELAA Methodology2021 , the HELAA Panel has agreed standard and ‘market condition’ models to determine commencement and housing delivery rates for existing planning commitments and submitted strategic sites that have passed the tests of suitability, availability and achievability. The models are contained in Appendices 1 and 2 of the HELAA Methodology and are based upon the Panel’s knowledge of the development industry’s capacity to build.
- 9.30 The 2021 models reflect revisions made in the NPPF to the definition of a ‘deliverable’ site for housing. The new version of the models are used to determine commencement and housing delivery rates for existing planning commitments and submitted strategic sites. This information has been used to populate the forecasts of completions within the housing trajectory.
- 9.31 For the sites identified from the 3 Call for sites in the Indicative Housing Trajectory in Appendix I the Council has applied the rates from Appendix 2 of the HELAA methodology – but with NIL delivery forecast in years 1 to 5.
- 9.32 The forecasts for commitments comes from the Housing Monitoring Update 2022, and that document explains the approach and use of the HELAA methodology and additional information for forecasting those sites’ delivery.

#### **Appendix I – Indicative Housing Trajectory**

- 9.33 The housing forecasts are summarised in the Indicative Housing Trajectory in Appendix I. Every site identified through the assessment of the Call for sites is listed, so that it is transparent where sites have NIL counts as well as those sites with dwellings counts. Only sites which are available, suitable and achievable have a total count greater than NIL. The counts are net, in that overlaps with other sites have been excluded. Therefore the counts can be summed to a District total.

- 9.34 The trajectory includes completions planning commitments, the Cranbrook DPD Expansion Areas, and the windfall allowance. The source of that information and forecast is explained in Sections 7 and 8 of this HELAA report.
- 9.35 The time periods used in the Indicative Housing Trajectory are based on the PPG definitions of deliverable and developable. No completions on are forecast as deliverable at this time, mindful of PPG guidance on how to count allocations /sites without detailed planning permission.
- 9.36 It should be noted that the Council has forecast the potential for completions on an annual basis for housing for the period April 2022 to 31 March 2040, and for the post plan period for every site from the Call for sites that are assessed available, suitable and achievable where the net count (omitting overlaps) is more than NIL.
- 9.37 The housing trajectory in the annual East Devon Housing Monitoring update 2022 does not be superseded by the housing trajectory in this HELAA forecast for the purpose of the Council's formal position on the 5 year housing land supply for Development Management purposes.
- 9.38 The Council is preparing an interim Housing Topic Paper which is the audit trail document evidencing how the Council is using evidence, including the HELAA evidence to justify the housing requirement policy in the emerging local plan. This Topic Paper will later be updated as the site allocations are identified, the latest housing monitoring information and site delivery forecasts are produced, supply assessment and illustrative trajectories are produce and a full rolling 5 year housing land supply assessment across the plan period is undertaken. When available, this evidence will supersede the trajectory in this HELAA report.

## **EMPLOYMENT**

- 9.39 The HELAA Methodology does not include a delivery model for employment sites. Instead, it has been agreed with the Panel that the timing of delivery of sites with economic development potential should be considered on a case by case basis, informed by site specifics and advice provided by the Panel. The Panel conclusions indicate if development should be for specific types of employment uses.
- 9.40 In most cases, the East Devon Panel has not indicated a time frame. Exceptionally there is an indication of phasing. The GESP Panel indicated some timeframes but that evidence is 5 years old and time has moved on. Also, the strategic approach used originally by the Panel is not necessarily being applied by the Council, as the emerging Local Plan will provide a new strategic context, when it has been endorsed. At this time a simpler approach of simply assuming an even delivery rate across years 6 to 15 has been applied for this HELAA.
- 9.41 Unlike housing. PPG on HELAA does not specifically require a trajectory for the delivery of employment land. The Council has carried out an early assessment that results in an indicative trajectory which is summarised in Table 3. There is no trajectory for employment delivery in the Employment Land Review. In the absence of a detailed forecast, the Council has assumed that development is evenly spread across years 6 to 15 for sites identified and assessed as available, suitable, and achievable. A similar assumption is made for the other supply sources.

## Appendix J – Indicative Employment Land Trajectory

- 9.42 The employment land forecasts are summarised in the Indicative Employment Land Trajectory in Appendix J. Every site identified through the assessment of the Call for sites is listed, so that it is transparent where sites have NIL counts as well as those sites with land area (hectares) counts. Only sites which are available, suitable and achievable have a total count (in hectares) greater than NIL. The counts are net, so any overlaps with other sites have been excluded. Therefore the counts can be summed to a District total.
- 9.43 The trajectory includes completions planning commitments, the Cranbrook DPD Expansion Areas, but there is no windfall allowance. The source of that information and forecast is explained in Sections 7 and 8 of this HELAA report.
- 9.44 In the absence of evidence about the need for employment land, the Council is not able to conclude at this time whether there is enough potential land supply to meet need. However, the scale of the potential supply is the Employment Land trajectory is significant. Further review of the sites may be necessary to assess potential supply from these sites for specific employment uses.

### **CONCLUSIONS**

- 9.45 Having had three call for sites that resulted in a net 636 sites (gross 827 submissions) being put forward, the above assessments indicate that:
- a) There is potential for a substantial supply of sites for housing development in East Devon, which significantly exceeds the forecast need. But this will be reduced when an emerging spatial strategy and emerging strategic and local policies can be applied.
  - b) There is likely potential for a substantial supply of land for employment development in East Devon, although in the absence of a forecast need the Council cannot conclude how much that potential surplus is. That assessment will need to await information about need and the quality of existing supply on commitments and current stock.
  - c) At this time, work needs to be completed on assessing supply from other supply sources, but because sites identified from the Call for sites are within those categories, the potential for much additional supply may be somewhat limited. The results of this work will need to be reported through a HELAA addendum report.
  - d) There is no information at this time to conclude that a further Call for Sites is necessary.
  - e) Current work on the site selection process is considering the implications of the emerging spatial strategy and policies. The outcome of that work may provide evidence to indicate whether there is any potential supply shortfall. If so, the Council would then need to consider how to respond. Options may include:
    - A further Call for sites
    - Revisiting assumptions and assessments to see if there are ways to mitigate constraints;
    - Exploring the implications if insufficient supply can be identified compared to the assessed housing or employment development needs.

## 10.0 STAGE 5 - Final Evidence Base

- 10.1 In the PPG methodology, if there are enough sites/broad locations, then the final stage of HELAA as set out in the PPG flowchart focuses on
- a) Publication of the evidence base
  - b) Identification of how much of the potential capacity that is suitable, available and achievable is
    - Deliverable for the specified use (i.e. can be completed in years 1 to 5)
    - Developable for the specified use (i.e. can be completed in years 6+)
- 10.2 This HELAA report's conclusions in Section 9 are a step on this process. But until the strategy and policies can be applied, and until the evidence about employment need is available it is not possible for this HELAA report to be the final evidence base or to conclude that enough sites/broad locations have been identified.
- 10.3 In line with PPG HELAA the following a set of standard outputs have been produced, as far as consistent the current evidence. The current results of the HELAA are provided in a number of appendices to this report.
- A list of all sites or broad locations considered (Appendix E(iv) cross-referenced to their locations on maps (D(i), D(ii) and D(iii)); The list of sites and broad location are also reported for the three Call for sites in Appendices E(i) – 2017 Strategic sites, E(ii) – 2021 and 2017 non-strategic sites and E(iii) - 2022 sites, with more information about the sites, including site overlap descriptions
  - A list of all sites or broad locations which are currently achievable but not suitable or nor deliverable or developable (Appendix E(v)1 – Housing; Appendix E(v)2 – Employment led (these are ordered by HELAA ref no.
  - An assessment of each site or broad location (Appendix F – broken down in to Appendices F(i), F(ii) and F(iii)), ordered by Parish and then HELAA ref no, including:
    - Where these have been discounted, evidence justifying reasons given;
    - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
    - An indicative trajectory of anticipated development based on the evidence available
  - Indicative district trajectories for housing/mixed use sites (Appendix I) and economic (employment led sites) (Appendix J).