

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY SUB COMMITTEE ON 15 DECEMBER 2020

**SUBJECT: Housing and Economic Land Availability Assessment
(HELAA 2020 update)**

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DATE: 30 November 2020
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PORTFOLIO AREA: Planning Policy

EXECUTIVE SUMMARY:

The Council has reviewed and updated its Housing and Economic Land Availability Assessment (HELAA) for 2020. This document provides the Council with a database of sites within the District. Each site within the database has been assessed to determine whether it is deliverable, developable or not currently developable according to the HELAA methodology. It is important to note that whilst the HELAA is a useful resource, it does not allocate sites, nor does it grant planning permission. Its principal purpose is to provide evidence at a high level, identifying the best performing sites with potential to consider for further assessment as part of plan making. The HELAA is not intended to be used for development management decisions, as set out in national guidance.

RECOMMENDATIONS:

It is recommended that: -

1. The Planning Policy Sub-Committee notes the Housing and Economic Land Availability Assessment as part of the evidence base for the Local Plan and any future Development Plan Document preparation.

1. BACKGROUND:

- 1.1 The Housing and Economic Land Availability Assessment (HELAA) is a key component of the evidence base which informed the preparation for the Arun Local Plan (ALP) and keeping it up to date will inform future monitoring of potential land supply.
- 1.2 In line with national policy, the Council is required to be proactive and to plan positively to ensure that the development needs of the district are met in a sustainable way. This requires clear and robust evidence which is updated each year through consulting landowners and promoters/developers on the status of their sites including a 'call for sites' to identify new potential housing and employment and supply.

- 1.3 Through maintaining and updating the HELAA, there is an assessment of land availability which identifies a future supply of land which is suitable, available and achievable for housing and economic development uses over the plan period. The assessment is an important source of evidence to inform plan and decision making, and the identification of a 5-year supply of housing land. It can also inform as well as make use, of sites in brownfield registers.
- 1.4 Paragraph 67 of the National Planning Policy Framework (NPPF) (2019) requires a Local Planning Authority to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (e.g. HELAA). From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 1.5 The Planning Practice Guidance (PPG), which was published in March 2014 and is continually updated, recommends that housing and economic evidence should be undertaken as part of the same exercise.
- 1.6 The NPPF 2019 sets out components of delivering a sufficient supply of homes. One of the key components is the strengthening of the definition of '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 depending on the planning status e.g. whether there is detailed planning permission, an outline permission for major development or a site is allocated and is supported by clear evidence on deliverability (NPPF 2019 Appendix 2 Glossary, page 66).
- 1.7 National guidance still requires an assessment of site availability, suitability and likely economic viability to be considered. In particular, the Government places significant emphasis on securing a 5-year housing land supply (5yr HLS) using this more robust evidence approach in order to boost housing delivery.
- 1.8 The HELAA is updated each year and is an important element of the Council's housing evidence base for the identification of a supply of 'specific, deliverable' sites for years one to five of the plan period; and 'specific, developable sites or broad locations for growth', for years 6-10 and where possible, for years 11-15 of the plan. This updated HELAA is measured with a base date of 1 April 2020 (see paragraph 67 clauses a) and b) respectively, of the NPPF).
- 1.9 The HELAA tests the delivery of the housing requirement figure for the district by informing the preparation of a housing trajectory. This is published with the Authorities Monitoring Report (AMR) 2019/20.

Aims of the HELAA

- 1.10 The overall aim of the HELAA is to:
 - Produce a list of sites, cross referenced to maps showing locations of specific sites;

- Provide an assessment of each identified site;
- Identify the potential type and quantity of development that could be delivered on each site; including a reasonable estimate of build out rates; and setting out how any barriers to delivery could be overcome.

1.11 In order to ensure that the HELAA is up to date, officers have reviewed the content of the assessment published in 2019 and prepared an updated version for use alongside the preparation of relevant planning policy documents.

Methodology

1.12 The HELAA update has been prepared according to a methodology prepared by the Council. This methodology follows that prescribed within the PPG and necessarily has been updated to align with recent changes introduced in the PPG in 2019 which clarified the iterative application of high-level assessments to be able to refer to development plan constraints (i.e. not only national designations set out in footnote 6 to the NPPF 2019).

Key Issues to Note

1.13 It is important to note that the HELAA:

- Does not form part of the Development Plan and does not allocate sites for development nor preclude those sites not identified from coming forward for planning permission in the future
- Does not provide a relative assessment of sites against each other and does not provide any ranking or order of preference. Each site is appraised on its own merits.
- Does not indicate that planning permission will be granted for housing development if a site is included in the HELAA. It is not intended to pre-empt any plan making or other planning related decisions and does not indicate that planning permission should be granted or not granted for housing or any other use on any identified site.

1.14 In addition, it should be noted that:

- Inclusion of a site in the HELAA does not mean that it will be allocated for development.
- Planning applications on sites identified within the HELAA will continue to be determined on their merits in line with the development plan unless material considerations indicate otherwise. The HELAA may however form a material consideration in the determination of planning applications.

Site identification

1.15 The main method of identifying sites is through an annual call for sites exercise which provided an opportunity for landowners, site promoters and interested parties to submit land for consideration. Another method of identifying sites is through the Council's planning weekly lists.

Site Assessment

1.16 All sites within the HELAA are subject to assessment. The Site assessment draws out further information about each site and its potential suitability for housing/employment development.

1.17 Sites are classified in the HELAA as follows:

- **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. Sites that are not major development, and 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 (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. These sites are coloured BLUE on the HELAA map.
- **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. These sites are coloured ORANGE on the HELAA map.
- **Not currently developable:** if it is not known when a site could be made available or viably developed, it is considered 'Not Currently Developable' and is coloured RED on the HELAA map.

1.18 These classifications reflect the NPPF (2019) definition of 'deliverable'. It should be noted that the revised definition of 'deliverable' sites set out in the NPPF 2019 has been addressed in this HELAA. The proforma for the HELAA seek evidence on site deliverability trajectories from promoters and developers to help justify whether a site could be categorised as deliverable within 5 years.

1.19 Employment Sites are classified in the HELAA as follows:

- **Potential Employment Site:** to be considered 'a potential employment site it should be available now, offer a suitable location for development, and be achievable with a realistic prospect that a business use will be delivered on the site within five years. Sites that have planning permission for an employment use are considered potential employment sites until permission expires or the site is built out with an employment use. Sites that have been identified as a potential employment site but do not currently have permission are included if they have been promoted in the last 2 years. These sites are coloured YELLOW on the HELAA map.
- **Existing Employment Sites:** These are sites that were included from the original Economic Land Availability Assessment (ELAA) in 2010, although they do not have to be in the HELAA, for information purposes they remain in it. Once a potential employment site is built out it becomes an Existing

Employment Site. These sites are coloured BROWN on the HELAA map

1.20 It is important to note that the HELAA is a high level objective assessment of sites, and that specific locations cannot be excluded from the assessment, or their status amended, due to a lack of public support. Further, with national policy putting emphasis on the sequential and exceptions test with regard to flood zones and ensuring that the lifetime of the development is considered before sites are allocated or planning applications are approved, the requirements of Strategic Flood Risk Assessments have an impact on HELAA housing supply yields and the suitability and deliverability status of affected sites. This point is now addressed in the HELAA document methodology.

1.21 The result of the site assessments are presented in the main HELAA report according to their HELAA status (pages 40 – 44).

New Sites

1.22 22 new sites have been identified for this year's HELAA. These include sites that were submitted to the Council as part of the 'Call for Sites' exercise. It does not include commitments. Of these new sites, 3 were identified as being 'Deliverable' and 3 were identified as being 'Developable'. The remaining 14 sites were identified as being 'Not Currently Developable' due to suitability, availability and achievability reasons and two sites comprised 1 potential employment site and 1 existing employment site.

Key Findings

- The HELAA indicates a potential current supply of 33 deliverable sites (general) with capacity for 2,901 dwellings across the Local Planning Authority Area (LPAA). This is in addition to those sites which have been granted planning permission.
- In addition, it has identified a potential supply of 34 developable sites (general) with a yield of 3,740 dwellings (i.e. sites that are considered that could come forward over the lifetime of the plan).
- 230 sites are considered not to be developable at the time of publishing the HELAA.
- The deliverable supply from Strategic Allocation sites (not included in commitments) is 7,248 dwellings.
- The deliverable supply from Neighbourhood Plan Allocations (not included in commitments) sites is 285 dwellings.

2. PROPOSAL(S):

To note the Housing and Employment Land Availability Assessment as part of the evidence base for the Local Plan and any future Development Plan Document preparation.

3. OPTIONS:

The following options are available to Members:

1. To note the HELAA 2020 update Report as evidence to support monitoring of housing supply and housing delivery, or
2. Not to note the HELAA 2020 update.

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		X
Relevant District Ward Councillors	X	
Other groups/persons (please specify)		X
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial		X
Legal		X
Human Rights/Equality Impact Assessment		X
Community Safety including Section 17 of Crime & Disorder Act		X
Sustainability		X
Asset Management/Property/Land		X
Technology		X
Other (please explain)		X

6. IMPLICATIONS:

The HELAA is necessary evidence to support monitoring of housing supply and delivery.

7. REASON FOR THE DECISION:

To enable evidence to be updated on potential housing and employment land supply and delivery performance in support of the Adopted Local Plan and further plan making to ensure that the needs of the community in Arun are met sustainably.

8. BACKGROUND PAPERS:

- Arun Housing and Economic Land Availability Assessment 2020 (HELAA) available (together with the brownfield Register) on the Council's web site via: <https://www.arun.gov.uk/helaa-brownfield-land-self-build-registers>