

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF PLANNING POLICY COMMITTEE ON 25 JANUARY 2022

REPORT

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

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DATE: 6 December 2021
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AREA: Planning Policy

EXECUTIVE SUMMARY:

The Council has reviewed and updated its Housing and Economic Land Availability Assessment (HELAA) for 2021. It is important to note that the HELAA is a useful evidence resource for plan making i.e., 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 the Planning Policy Committee: -

1. Considers and 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; and
2. Agrees the HELAA 2021 be published on the Council's web site.

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 reported in the Council's Authority Monitoring Report (e.g. the five-year housing land requirement).
- 1.2 A Local Planning Authority (LPA) needs to have a clear understanding of the land available in their area (Paragraph 68 of the National Planning Policy Framework (NPPF 2021). The HELAA is therefore currently updated annually following a 'call for sites' to identify new potential housing and employment land supply and through consulting landowners and promoters/developers on the status of their sites which:-

- Assesses land availability based on whether it is suitable, available and achievable (including economic viability) for housing and economic development uses over the plan period.
- Considers housing and economic evidence together as part of the same exercise (Planning practice Guidance).
- Assess compliance with the Government's definition of 'deliverable' sites.
- 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 this supported by clear evidence on deliverability (NPPF 2021 Appendix 2 Glossary, page 66).
- Informs plan making and delivery of housing trajectories.
- Informs the 5 year housing land supply published within its Authorities Monitoring Report (AMR).

1.3 In particular, the Government places significant emphasis on securing a 5-year housing land supply (5yr HLS) using this more robust evidence approach to boost housing delivery. The evidence needs to include written confirmation (e.g., emails, letters, Statements of Common Ground or Memoranda of understanding) from developers and landowners agreeing with the local planning authority, the delivery dates of sites in accordance with site housing trajectories.

1.4 In addition to sending out the HELAA proformas and Call for sites on the 4th June 2021, in March this year, the Council specifically wrote to 24 key developers/land promoters for strategic allocations (with and without outline planning permission) seeking to help to identify and resolve barriers to development and inviting Statements of Common Ground (ScG) supporting site housing trajectories. However, this was unsuccessful with a low response (7) and low interest in agreeing ScG (1).

1.5 In the light of the above, the 'call of sites' proforma will be amended as part of the preparation for the next HELAA review (2022) to include a 'delivery certificate'. Promoters/developers will be invited to sign the certificate (showing the housing trajectory) as evidence demonstrating their commitment to adhering to the trajectory timescales set out in their supplied proforma. National policy and guidance requires authorities to pro-actively seeks such delivery evidence, to ensure that there is confidence with the stated delivery status of sites to be included in the HELAA and subsequent 5 year housing land supply calculation.

Aims of the HELAA

1.6 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.

- 1.7 To ensure that the HELAA is up to date, officers have reviewed the content of the assessment published in the HELAA 2020 against those sites which received updates or where planning status changed (e.g., a planning permission gained or lapsed) and prepared an updated version HELAA 2021.

Key Issues to Note

- 1.8 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.

- 1.9 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

- 1.10 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. The Council may also use other sources of information to identify potential land availability e.g., the Brownfield Land Register and through the Council's planning weekly lists.

Site Assessment

- 1.11 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.

- 1.12 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 over the lifetime of the plan. 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 or subject to suitability, availability and achievability constraints it is considered ‘Not Currently Developable’ and is coloured RED on the HELAA map.

1.13 These classifications reflect the NPPF (2021) definition of ‘deliverable’. The proforma for the HELAA seeks evidence on site characteristics including constraints to deliverability and consequent site trajectories from promoters and developers in order to help justify whether a site could be categorised as deliverable within 5 years. As set out in section 1.4 and 1.5 above the Council will require signed ‘delivery certificates’ when it next prepares the HELAA update.

1.14 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 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.

1.15 A summary of the results is set out in the tables below compared to the previous year. The full site assessments are presented in the main HELAA report according to their HELAA status (pages 41 – 47).

Table 1: Summary of New Sites

Key Finding*	HELAA 2019/20	HELAA 2020/21
New Sites		
Deliverable	3	3
Developable	3	3
NCD	14	12
Existing Employment	1	0
Potential Employment	1	1

Total	22	19
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** sites that were submitted to the Council as part of the 'Call for Sites' exercise (these sites do not include commitments – i.e. sites which have been granted planning permission*

Key Finding*	HELAA 2019/20		HELAA 2020/21	
	Sites	Dwelling Yield	Sites	Dwelling Yield
Total Deliverable (General)	33	2,901	23	2,711
Total Developable (General)	34	3,740	34	3,556
Total NCD	230	N/A	233	N/A
Deliverable on Strategic Allocations	14	7,248	10	6,840
Deliverable NDP	5	285	7	403

** These sites do not include commitments – i.e. sites which have been granted planning permission*

Conclusion

1.16 The HELAA status update informs the Councils Authority Monitoring Report 5-year housing land supply (see separate item on the Agenda) and identified:-

- Marginally fewer new sites compared to last year;
- A reduction in Deliverable sites due to status transfers to Commitments; Developable status; NCD status; or to 'made' NDP Deliverable sites;
- Dwelling yields on sites (i.e., excluding sites with planning permission) have reduced through a combination of a reduced number of Deliverable sites including significantly revised housing trajectories in the light of appeal and other evidence;
- Dwelling yields have increased on Neighborhood Plan sites with additional Deliverable sites.

1.17 The Planning Policy Committee are invited to consider and note the HELAA Report outputs.

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 2021 update Report as evidence to support monitoring of

housing supply and housing delivery, or 2. Not to note the HELAA 2021 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 to achieve suitable communities.		

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 2021 (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>