

---

### Cabinet Member for Housing and Communities

---

**Time and Date**

2.00 pm on Tuesday, 26th October, 2021

**Place**

Diamond Rooms 1 and 2 - Council House

Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing. If you wish to attend in person, please contact the Governance Services Officers indicated at the end of the agenda.

---

**Public Business**

1. **Apologies**
2. **Declarations of Interest**
3. **Minutes** (Pages 3 - 6)
  - a) To agree the minutes of the meeting held on 21 September 2021
  - b) Matters arising
4. **Housing and Employment Land Availability Assessment (HELAA) Methodology Consultation** (Pages 7 - 32)

Report of the Director of Streetscene and Regulatory Services
5. **Outstanding Issues**

There are no outstanding issues
6. **Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

**Private Business**

Nil

---

Julie Newman, Director of Law and Governance, Council House Coventry

Monday, 18 October 2021

Note: The person to contact about the agenda and documents for this meeting is Usha Patel Governance Services Officer, Email: [usha.patel@coventry.gov.uk](mailto:usha.patel@coventry.gov.uk)

Membership: Councillor D Welsh (Cabinet Member)

By invitation: Councillors R Bailey and M Lapsa (Shadow Cabinet Members) and Councillor L Bigham, Chair, Communities and Neighbourhood Scrutiny Board (4)

**Public Access**

Please note that in line with current COVID regulations, there will be limited public access to the meeting to ensure social distancing.

Any member of the public who would like to attend the meeting in person is required to contact the following officers in advance of the meeting regarding arrangements for public attendance. A guide to attending public meeting can be found here:

<https://www.coventry.gov.uk/publicAttendanceMeetings>

**Usha Patel**

**Governance Services Officer**

**Email: [usha.patel@coventry.gov.uk](mailto:usha.patel@coventry.gov.uk)**

**Coventry City Council**  
**Minutes of the Meeting of Cabinet Member for Housing and Communities held at**  
**2.00 pm on Tuesday, 21 September 2021**

Present:

Members: Councillor D Welsh (Chair)

Shadow Cabinet  
Members Present: Councillor R Bailey and Councillor M Lapsa

Other Members: Councillor K Maton (item 14 below)

Employees Present:

D Butler, Planning and Regulation  
U Patel, Law and Governance

Apologies: Councillor L Bigham

## **Public Business**

### **12. Declarations of Interest**

Councillor R Bailey declared an "Other Interest" in the matter the subject of Minute 14 below headed "Response to Petition Regarding Building on Areas Identified as Green Belt and Urban Green Space". As a member of the Planning Committee, he stated that he would not be discussing specific applications.

### **13. Minutes**

The minutes of the meeting held on 9 July 2021 were agreed as a true record. There were no matters arising.

### **14. Response to Petition Regarding Building on Areas Identified as Green Belt and Urban Green Space**

The Cabinet Member considered a report of the Director of Streetscene and Regulatory Services which provided a formal response to a petition regarding building on areas identified as green belt and urban green space.

The petition bearing 117 signatures was submitted on 28 May 2021 and was sponsored by Councillor K Maton, a Henley Ward Councillor. Councillor Maton and the petition organiser attended the meeting and spoke in respect of the petition.

The petition headed "Green Urban Space and Green belt Policy" read:

"We the undersigned petition the Council to reiterate its policy that no housing should be allowed on identified green belt or urban green space areas. Further, that the council increases efforts to ensure that new housing

areas contain high levels of quality accessible landscaped space and developers are encouraged to provide such landscaped areas and gardens as part of their housing developments

The council has both a policy of “brownfield first” and a policy of the protection of green belt and urban green spaces. In the recent planning application by the council for Elm Fields Farm it includes houses on land that was identified as urban green space in the Coventry Local Plan and the previously approved planning application. We are alarmed that the council could be setting a dangerous precedent for future planning applications by this application”.

The report stated that it was taken that urban green space referenced in the petition and the land designation Local Green Space are synonymous. The Council’s position on development in green belt and Local Green Space are expressed in Policy GB1 of the Local Plan, specifically:

- “2A: Inappropriate development will not be permitted in the Coventry Green Belt unless very special circumstances exist. Development proposals, including those involving previously developed land and buildings, in the Green Belt will be assessed in relation to the relevant national planning policy. And
- 2B: Within areas designated as Local Green Space, the erection of small buildings and structures which are ancillary to the primary use of the land may be acceptable. Other development will not be permitted unless very special circumstances are demonstrated”.

The Council remains committed to the above policy, which also conforms with national policy.

The Council also remains committed to delivering high quality residential environments through the use of Plan policies and constructive negotiation with developers. To further aid this, the Council would soon be undertaking a public consultation on a Green Space Supplementary Document (SPD) that would further articulate developers’ requirements and help deliver on-site provision of a variety of open space typologies.

Councillor Maton commented that the recent Covid pandemic had highlighted the importance of green space and placed it firmly on the health and wellbeing agenda. He referred to recent developments in the city where one had incorporated plenty of green space and the other, on a former industrial site, consisted of cramped housing with very little green space. He added that developments should comprise of good quality housing with ample green space, not just back yards.

The petition organiser explained that the motivation behind the petition was to campaign against a specific planning application and he expressed disappointment at the Council for failing to fulfil policy in respect of that development. He stated that the Council should lead by example and be committed to providing high quality housing.

Whilst it would not be appropriate to comment on specific planning applications, it should, however, be noted that green belt and Local Green Space are specific land designations. These could easily be viewed via the interactive Policies map on the City Council website and compared with planning applications.

In summary, the report stated that it was important to note that each planning application must be determined on its own individual merits. Therefore, any decision on a specific application should not be considered to be a precedent.

The Cabinet Member having considered the report, the representations made at the meeting, and the representations made by Councillor Maton and the petition organiser, thanked everyone for their valuable contributions. He concluded that the Council's role was to meet the housing targets set by the government and those identified in the Local Plan.

**RESOLVED that the Cabinet Member for Housing and Communities, having considered the petition, reiterates the position set out in the Local Plan Policy GB1.**

**15. Outstanding Issues**

There were no outstanding issues.

**16. Any other item of public business which the Cabinet Member decides to take as matters of urgency because of the special circumstances involved**

There were no other items of business.

(Meeting closed at 2.40 pm)

This page is intentionally left blank



## Public report Cabinet Member

---

Cabinet Member for Housing and Communities

26 October 2021

**Name of Cabinet Member:**

Cabinet Member for Housing and Communities – Councillor D Welsh

**Director Approving Submission of the report:**

Director of Streetscene and Regulatory Services

**Ward(s) affected:**

All

**Title:**

Housing and Employment Land Availability Assessment (HELAA) Methodology Consultation

---

**Is this a key decision?**

No.

Although the matters within the report affect all wards in the city, it is not anticipated that the impact will be significant

---

**Executive Summary:**

This report requests permission to consult on the proposed Housing and Employment Land Availability Assessment (HELAA) Methodology. This methodology would then be used when assessing proposed employment or housing sites in terms of whether or not they are suitable for development, which is an essential part of the Local Plan process. The proposed consultation will take place simultaneously with the Warwickshire District and Borough authorities who form part of the Housing Market Area (HMA) and who are working together under the statutory Duty to Co-operate.

**Recommendations:**

1. The Cabinet Member is requested to approve that the Methodology contained in Appendix I is taken to public consultation for a period of six weeks, in line with the Council's Statement of Community Involvement.

**List of Appendices included:**

Appendix I – Draft HELAA Methodology

**Background papers:**

None.

**Other useful documents:**

None.

**Has it been or will it be considered by Scrutiny?**

No.

**Has it been or will it be considered by any other Council Committee, Advisory Panel or other body?**

No.

**Will this report go to Council?**

No.



## **Report title: Housing and Employment Land Availability Assessment (HELAA) Methodology Consultation**

### **1. Context (or background)**

- 1.1 Coventry and Warwickshire Local Planning Authorities (LPAs) have a long history of constructively working together to address a range of strategic planning matters. This relationship has enabled the LPAs to achieve sound Local Plans, Shared evidence and a collaborative approach is a vital element of being able to fulfil the statutory Duty to Co-operate and needs to be demonstrated to Planning Inspectors when Local Plans are examined.
- 1.2 The evidence base which informs the development of a Local Plan needs to be regularly reviewed and updated. Many of the Local Plans in the Coventry and Warwickshire area are currently being reviewed and updated, all running at different timescales. Similarly, the Government has updated the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG), so evidence needs to be reviewed in the light of this.
- 1.3 In delivering sufficient housing and employment land to meet identified requirements it is important that each Local Authority keeps an up to date database of sites, which it needs to assess to see if they are suitable, available and can realistically be delivered to meet the needs of the area. This is especially important in order to be able to demonstrate a five year supply of housing sites (one of the government's key indicators for measuring success of a Local Authority's planning policies in delivering its stated ambitions for housing growth) and in encouraging brownfield opportunities to come forward, reducing pressure upon land which has not previously been developed. It is also important in understanding which sites are being promoted for potential economic use, so that a balanced and sustainable local economy can be achieved across the area.
- 1.4 The database of sites is known as the Housing and Employment Land Availability Assessment (HELAA). In order to keep this essential evidence up to date, each Local Authority will run its own 'call for sites' process, which in effect is an invitation for land owners, developers and their agents to express their interest in having their site considered for a range of uses such as housing, employment or even a range of other uses they wish to be considered through the local plan process. Inclusion in the HELAA document does not mean they will be developed: that is for the Local Authority to determine through their assessment process.
- 1.5 However, it is important that Local Authorities work together to make sure that they operate consistently. This is especially important when addressing areas where there are strong strategic relationships which stretch across different administrative boundaries such those relating to housing and the economy. This applies to the Coventry and Warwickshire area.
- 1.6 It is therefore essential that when Local Authorities look at the detail of how they plan for growth, they do it in line with a common methodology to ensure consistency of approach and understanding. The attached methodology has been drafted by Coventry and Warwickshire Local Planning Authorities to ensure that sites are being assessed within a common framework which accords with the most up to date National Planning Policy and guidance. It updates the previous agreed version which is now out of date.
- 1.7 Before the methodology is finalised, it is considered good practice to publicly consult for a period of six weeks to provide any opportunity for feedback and make any changes should this be necessary. This will ensure that the Local Authorities are operating within

a robust framework as they develop and progress the detail of their own individual (or joint) local plans.

## **Implementation**

- 1.8 Coventry City Council has committed, through its Local Development Scheme (the project timetable for the Local Plan), to undertake a 'call for sites' in Autumn 2021 which will be specifically focused upon encouraging brownfield sites to come forward for consideration. This updated methodology will greatly assist with this commitment.

## **2. Options considered and recommended proposal**

- 2.1 The Council could choose to progress with the HELAA methodology without consultation. This would not constitute best practice, and would be at odds with the other authorities in the Housing Market Area (HMA). It is therefore not recommended.
- 2.2 The Council could choose not to use the HELAA methodology and use the methodology used in the run up to the Local Plan. However, there have been changes to the National Planning Policy Framework and the Planning Practice Guidance and updating the methodology is appropriate. As per 2.1 this option would mean we were using a process different to the rest of the HMA authorities which, as outlined in section 1, would be contrary to our Duty to Co-operate. This option is therefore not recommended.
- 2.3 Officers recommend consulting on the HELAA methodology in Appendix I, in line with best practice and in conjunction with our neighbouring authorities in the HMA.

## **3 Results of consultation undertaken**

- 3.1 No consultation has been undertaken as part of this report, but consultation is proposed.

## **4 Timetable for implementing this decision**

- 4.1 It is proposed to take the Methodology to public consultation at the earliest opportunity. As it is intended for the six Local Planning Authorities in the HMA to consult simultaneously, it cannot be confirmed what date this will commence on.

## **5 Comments from the Director of Finance and the Director of Law and Governance**

### **5.1 Financial implications**

There are no financial implications associated with this report.

### **5.2 Legal implications**

There are no legal implications associated with this report.

## **6 Other implications**

### **6.1 How will this contribute to achievement of the Council's Plan?**

Planning policy documents and planning applications help deliver the aims and objectives of the One Coventry Corporate Plan by determining the type and quantum of development needed, where this should be located, areas which should be protected,

enhanced or improved and the infrastructure which should be provided. In line with the Corporate Plan, this document focuses upon supporting local communities and the local economy by gathering information which will help the council to increase the supply, choice and quality of housing and employment land by identifying a range of suitable sites.

## **6.2 How is risk being managed?**

There are no risks associated with this report

## **6.3 What is the impact on the organisation?**

No direct impact.

## **6.4 Equalities / EIA**

A full Equality and Impact Assessment (ECA) was undertaken as part of developing the Local Plan. As part of that analysis, the Council had due regard to its public sector equality duty under section 149 of the Equality Act (2010).

## **6.5 Implications for (or impact on) climate change and the environment**

There are no implications identified.

## **6.6 Implications for partner organisations?**

There are no implications identified.

### **Report author:**

#### **Name and job title:**

Clare Eggington  
Principal Town Planner (Planning Policy)

#### **Service**

Streetscene and Regulatory Services

#### **Tel and email contact:**

Tel: 02476 972751

Email: [clare.eggington@coventry.gov.uk](mailto:clare.eggington@coventry.gov.uk)

Enquiries should be directed to the above person.

This report is published on the council's website:

[www.coventry.gov.uk/councilmeetings](http://www.coventry.gov.uk/councilmeetings)

<b>Contributor/approver name</b>	<b>Title</b>	<b>Service</b>	<b>Date doc sent out</b>	<b>Date response received or approved</b>
<b>Contributors:</b>				

Usha Patel	Governance Services Officer	Law and Governance	02/09/21	03/09/21
David Butler	Head of Planning Policy & Environment	Streetscene and Regulatory Services	01/09/21	02/09/21
Rob Back	Strategic Lead Planning and Major Development	Streetscene and Regulatory Services	02/09/21	06/09/21
<b>Names of approvers for submission:</b> (office rs and members)				
Cath Crosby	Lead Accountant, Business Partnering,	Finance	02/09/21	03/09/21
Clara Thomson	Planning and Highways Lawyer, Legal Services	Law and Governance	02/09/21	03/09/21
Andrew Walster	Director of Street Scene and Regulatory Services	-	02/09/21	06/09/21
Councillor D Welsh	Cabinet Member for Housing and Communities	-	07/09/21	21/09/21

# **Coventry and Warwickshire Sub-Regional Joint Method Statement**

## **Housing and Economic Land Availability Assessment - Methodology**

**September 2021**

DRAFT

# CONTENTS

1. Introduction
2. Methodology
3. Implementation

## APPENDICES

Appendix 1. Example Proforma

# 1. Introduction

- 1.1 The National Planning Policy Framework (the “NPPF”) specifies that policy-making authorities should prepare strategic assessments of land availability for their areas. Arising from this assessment, strategic policies can be formulated to identify areas and locations for growth that can meet development need.
- 1.2 This joint statement has been prepared between the authorities that comprise the Coventry and Warwickshire sub-regional area and is an update from the Joint Statement published in May 2015 to ensure that it reflects the most up to date national guidance from Government.
- 1.3 In line with the recommendations of the Planning Practice Guidance (PPG)<sup>1</sup> the methodology is an agreed approach between the Local Planning Authorities (LPAs) that make up the Coventry and Warwickshire Housing Market Area (the HMA) and the Functional Economic Market Area (FEMA) where these two areas overlap. The LPAs are:
- Nuneaton and Bedworth Borough Council
  - Coventry City Council
  - Rugby Borough Council
  - Warwick District Council
  - Stratford on Avon District Council
  - North Warwickshire Borough Council
- 1.4 Forming part of this update is a joint movement away from the original sole focus on housing land assessment, which was referenced as a Strategic Housing Land Availability Assessment (SHLAA) to a **Housing and Economic Land Availability Assessment (HELAA)**, which considers both housing and employment sites . This has been agreed by the LPAs to more appropriately reflect the updates made by the PPG in 2019:
- “Plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) that is most appropriate.”*
- 1.5 It is not the objective of this joint methodology to standardise the methods made to assess land availability in each Local Authority, but rather provide a broad framework to ensure a consistent approach, which each Local Authority can then adapt to reflect their own local circumstances.
- 1.6 The detailed HELAA produced by each Local Authority should:
- Identify sites and broad locations with development potential (housing, economic or other);
  - Assess their potential for development in terms of:
    - o their availability for development and whether they can be brought forward as locations for housing, economic or other form of development;

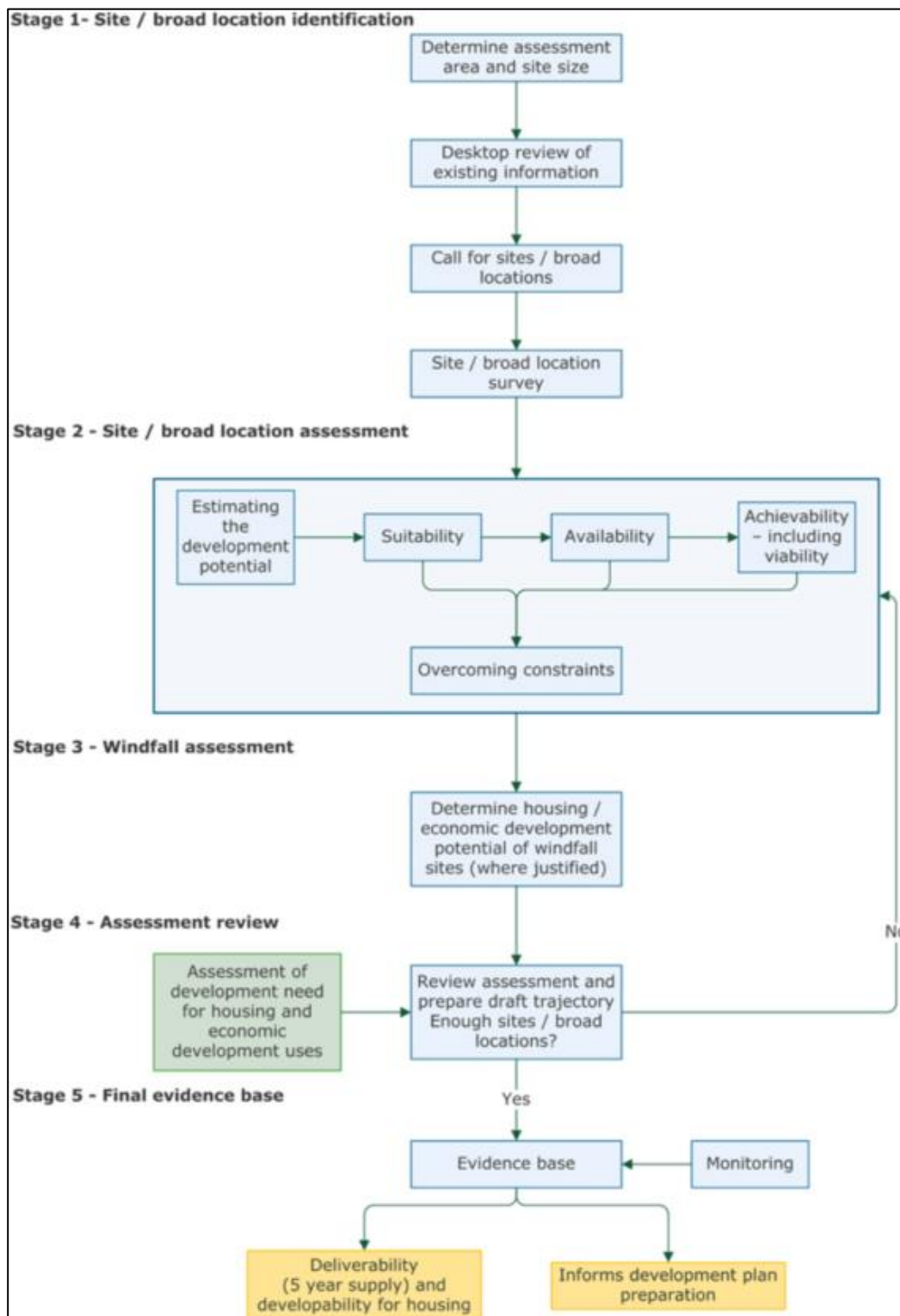
<sup>1</sup> Paragraph 007 Reference 3-007-20190722

- their suitability to accommodate development, taking into consideration their context, constraints and policy designations;
  - their achievability in terms of market desirability and viability for development.
- 1.7 Sites that are identified through the HELAA are assessed as to whether they could be developed. The assessment does not make a judgement whether they should be developed. **Assessment does not allocate land for development, nor does it determine the acceptability of development on any site.**
- 1.8 The HELAA will form a part of the Local Plan evidence base for each Local Authority, and sites identified as being developable will need to be considered further in the light of additional evidence.
- 1.9 It will also assist in the preparation of Local Plans by quantifying the availability of land for housing, economic and other development
- 1.10 In preparing the update to the joint methodology, the LPAs consider it to be good practice to publish a draft (this document) and invite feedback for a six-week consultation period to be held in Autumn 2022.
- 1.11 In terms of the further work which each Local Authority will undertake relating to their detailed Call for Sites and assessment processes, it will be the decision of individual Authorities to develop the detail and separately consult on this in a way in which they feel most appropriate within their local context.



## 2. Methodology

- 2.1 The methodology will establish the basis of the approach to site assessment, but will allow appropriate provisions for further detail to be made to reflect the individual contexts of each LPA area.
- 2.2 The Planning Practice Guidance provides the following flow chart which establishes the basis of the approach to site selection and assessment:



## Stage 1: Identification of sites and broad locations

- 2.3 The PPG establishes that a geographical extent of site selection and assessment should be the plan-making area. This joint statement seeks to establish the basis of a consistent methodology between the parties involved to reflect the functionality of the HMA and FEMA and comply with the provisions of the Duty to Cooperate.
- 2.4 Guidance states that in the first instance, sites of a smaller size than 0.25ha, or with a capacity fewer than 5 dwellings, should not be considered as part of the HELAA process. The joint methodology will adopt this approach, but LPAs which comprise this joint method may individually opt to consider smaller sites where appropriate justification can be made.

### *Site Identification*

- 2.5 National Guidance stipulates two primary sources in identifying sites:
- Desktop Review
  - Call for Sites Exercise
- 2.6 Active desktop review ensures that all suitable sites can be identified even in the case where they have not been submitted to an LPA for consideration.
- 2.7 A desktop review of sites may utilise, but not limited to, the following sources<sup>2</sup>:

Type of site	Potential data source
Existing housing and economic development allocations and site development briefs not yet with planning permission	Local and neighbourhood plans Planning application records Development briefs
Planning Permissions for housing and economic development that are unimplemented or under construction	Planning application records Development starts and completion records
Planning applications that have been refused or withdrawn	Planning application records
Surplus and likely to become surplus public sector land	National register of public sector land Engagement with strategic plans of other public sector bodies such as county councils, central government, NHS, police, fire services, utilities services, statutory undertakers
Sites with permission in principle, and identified brownfield land	Brownfield land registers (parts 1 and 2) National Land Use Database

	Valuation Office database Active engagement with sector
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, eg offices to residential)	Local Authority empty property register English Housing Survey National Land Use Database Commercial property databases (eg estate agents and property agents) Valuation Office database Active engagement with sector Brownfield land registers
Additional opportunities for un-established uses (eg making productive use of under-utilised facilities such as garage blocks)	Ordnance Survey maps Aerial photography Planning applications Site surveys
Business requirements and aspirations	Enquiries received by local planning authority Active engagement with sector
Sites in rural locations	Local and neighbourhood plans Planning applications Ordnance Survey maps Aerial photography Site surveys
Large scale redevelopment and redesign of existing residential or economic areas	
Sites in adjoining villages and rural exception sites	
Potential urban extensions and new free-standing settlements	

2.8 In addition to a desktop review, a Call for Sites exercise can also enable third parties to promote sites to the LPAs for assessment. This ensures completeness in the HELAA process.

2.9 A Call for Sites conducted independently by each LPA (or LPAs where a joint plan is being prepared) will ensure that sites suitable for all land uses can be submitted for assessment. Submissions can be from any third party, with information stored to comply with data protection regulations.

2.10 A proforma, a copy of which can be seen at **Appendix 1**, will be provided to third parties to provide site submissions to the LPAs. This will provide as much information as possible, including the following details:

- Site location
- Suggested potential type of development
- Scale of development
- Constraints to development

2.11 In respect of constraints, the proforma at Appendix 1 has been developed to

allow submissions to establish any mitigations possible to overcome identified constraints. This is to “front-load” site assessment as far as possible and assist in the overall assessment process. This will ensure a more comprehensive assessment of proposed broad locations and potential sites as established in the PPG. It could also help identify potential new broad locations where development may be suitable, such as clusters of individual sites for example where cumulatively they could provide suitable infrastructure to deliver growth in a sustainable way.

- 2.12 Significant constraints should be considered at this stage where they will affect the assessment of broad locations and sites. This is to ensure that they are appropriately assessed before the detailed assessment stage. The joint statement allows provisions for LPAs to decide on what designations / limitations / constraints might result in site omission at this stage, given the unique contexts of each administrative area.

### **Stage 2: Site/broad location assessment**

- 2.13 The PPG outlines that at this stage site assessments should analyse sites for their capacity, developability, suitability and achievability.
- 2.14 *Capacity* should be determined by adopted and/or emerging policy determining appropriate densities, in the context of the National Planning Policy Framework in achieving efficient use of land. This should also take into consideration viability, given the quantum may affect viability and therefore, achievability and so inform developability within 5 years or beyond.
- 2.15 *Suitability* should be assessed against locational factors, identifiable constraints, their potential for mitigation as well as balancing on their potential impacts as a result of their development. Relevant information to inform this assessment may include:
- National (and local) policy designations
  - Appropriateness and likely market desirability of potential development
  - Contribution towards regeneration areas and priorities
  - Potential impacts on landscape, natural and heritage designations
- 2.16 Assessment should take into consideration existing Local Plans, but also emerging policy as well as the principle of development established by planning permissions or permissions in principle.
- 2.17 *Availability* can be assessed on the best information obtainable by the LPAs. This can be confirmed through submissions via Call for Sites by agents, landowners and/or promoters. Extant or expired planning permission can also inform availability and will establish 5-year timeframes, or beyond, of developability.

- 2.18 *Viability* is assessed through best judgement on the economic viability of a site and its desirability to be delivered within particular market conditions.

This can also be informed via submissions by third parties, where indication can be made of the potential type of development and how this will influence viability/desirability.

- 2.19 Assessment of overall developability should take into consideration any constraints and how they may influence the suitability of the site and its achievability. Desktop review will take this into account but this will need to draw on various sources of information to make an appropriate best judgement. In the case of a submission via a Call for Sites, front-loading information will be vital in identifying constraints and establishing mitigation. This will provide evidence in presenting the overall developability of a site.
- 2.20 When taking all of the above into account, the LPAs will be able to identify a timescale and rate of development that could be realised on those sites determined as deliverable and developable (suitable, available and achievable). This will take into account size, scale and quantum of development, which in turn should take into consideration lead-in times and build-out rates.
- 2.21 Whilst best judgement by the LPAs can guide these timescales and development rates, advice will also be sort from developers and other third parties submitting sites for assessment.

### **Stage 3: Windfall assessment**

- 2.22 Development sites that come forward outside of identification through the HELAA (or any other Planning Authority spatial assessment) are defined as windfall sites.
- 2.23 The PPG outlines that an allowance of windfall sites may be included within the land supply identified through the HELAA, but must be appropriately justified as established at Paragraph 71 of the National Planning Policy Framework (July 2021);

*“Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”*

- 2.24 It is not the objective of this joint statement to establish windfall allowances for each LPA. The windfall allowance is specific to each Local Authority area and the local evidence base for each will be used to inform this work and decide the extent to which windfall development should be considered in the HELAA process. An explanation of this assessment, with justification of conclusions will be provided by each LPA individually.

## **Stage 4: Review of the assessment**

- 2.25 Following assessment of sites and broad locations, an indicative trajectory will be produced. This will express the development quantum potentially available in terms of housing numbers and employment land and potentially the amount of other land uses that have been identified.
- 2.26 The trajectory will outline the forecasted delivery of development in three increments; 1 to 5 years, 6 to 10 years and 11 years and beyond. A risk assessment will accompany any trajectory, explaining specific issues to delivery which may impact on the trajectory.
- 2.27 At this stage, an LPA may identify a shortfall in supply to meet the needs of the plan area. The PPG advises that a Local Authority should re-visit their assessment, including enhancing or changing site capacities and densities in line with the NPPF's promotion of efficient use of land.
- 2.28 If evidence shows that a shortfall in provision continues to exist, LPAs should consider continued cross-boundary provisions in accordance with the statutory Duty to Co-operate. This will enable the necessary Statements of Common Ground and other joint agreements to be formulated as Local Plan work progresses, helping to achieve sound Local Plans.

## **Stage 5: Final evidence base**

- 2.29 The final HELAA report for each Local Authority (or Authorities where a joint plan is being prepared) will establish the approaches taken and identify the deliverable and developable sites and show a clear supply trajectory. All sites will be cross-referenced with location maps and their site assessments. The final report should also include sites that have been omitted from the supply, with reasons why.
- 2.30 The HELAA will be used by the Local Authorities to demonstrate a 5-year housing land supply position, as well as informing other spatially strategic policies within the plan preparation process.
- 2.31 A final report with appendices where appropriate and relevant will be published on each Authority's website for public view.

### 3. Implementation

- 3.1 This statement establishes the joint methodology in implementing a HELAA across the Coventry and Warwickshire sub-region.
- 3.2 The Planning Practice Guidance determines how housing and economic land assessment should be conducted and this has been closely woven into the joint methodology.
- 3.3 How this is implemented in practical terms is dependent on the local context. As such, this joint methodology references the functional relationships of the HMA and FEMA, whilst also providing sufficient flexibility for assessing sites in a range of contexts.
- 3.4 For example, the LPAs have agreed the importance of “front loading” information as far as possible. Previous experience has identified issues with understanding constraints and how they can be mitigated. The model Call for Sites proforma (Appendix 1) has therefore been updated from the previous version, allowing for additional information to be submitted, and each LPA can adapt this as it sees fit. This will assist in the site assessment stage.
- 3.5 Understanding the broader context of promoted sites is helpful and this is also reflected in the model proforma, where promoters are encouraged to indicate land for assessment (red line), and other land under the same ownership (blue outline). This provides additional flexibility in site assessment, especially in the case where the ‘red-line’ areas may be particularly constrained, but the additional ‘blue-line’ land may be available for mitigation purposes.
- 3.6 Although a detailed approach to assessment is not specified in this joint statement, to allow for flexibility for each individual LPA, it is expected that final assessments will produce conclusive commentary as to how sites have been assessed in either narrative or pictorial form, or both.
- 3.7 To illustrate this point, an example is set out below. In this instance, a ‘red-amber/yellow -green’ approach (RAG) has been used. Sites would be scored using particular suitability, achievability and availability considerations. Those sites for which constraints are absolute and cannot be mitigated would be scored red. Amber sites would have the potential to be mitigated and could be ‘upgraded’ to yellow depending on the level of information supplied which could demonstrate this mitigation. Green sites would have no constraints and could readily form part of the short-term supply.

Figure1: Example of a site assessment matrix (illustrative: each LPA would develop its own methodology for this level of detail)

		Availability & Achievability			
Suitability					

3.8 To summarise: this document has been prepared jointly to ensure a consistent shared approach to identifying and assessing sites for housing and employment uses, which will be used by each Local Authority (or alliance of Local Authorities where shared plans are developed) as the framework within which they will develop their detailed assessment and selection processes.



## **Appendix 1 Example Call for Sites Proforma**

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

#### **Call for Sites Proforma**

- Please complete this form if you would like to suggest proposals for future land use and development within XX Council on sites capable of delivery 5 or more homes, or sites larger than 0.25ha.
- The sites will be assessed as part of the HELAA and used as an evidence base document for the Local Plan preparation process.
- Please complete a separate form for each site. Complete each section clearly and legibly to the best of your knowledge. If you require more space, please use Section 9, or append additional pages.
- You must attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site and details of site ownership.

#### **Data Protection Disclaimer**

Details submitted to the Council as part of a Call for Sites will help inform the HELAA and assist in identifying land for development to contribute to a land supply to meet local need. The submitted information will not be confidential as it will be published as part of a comprehensive land assessment via published reports available for public consumption. This information will also be shared with other parties, including employees of the Council, other Council departments and third parties, such as the Planning Inspectorate and other Local Planning Authorities.

Details provided in Section 1 will be kept and stored confidentially by the Council. Details in Section 2, the names of which should match those provided in Section 1, will be made publicly available as established above. As such, only names of organisations/agents/applications will be made public where it has been clearly declared through this submission form. No other details, such as addresses or contact information, will be made available.

By submitting this form to the Council, you are providing consent for us to retain your details on our Planning Policy as part of the Call for Sites process, the HELAA and to enter your details to our consultation database so that we may contact you in future to advise on the Local Plan preparation process.

1. Your Confidentially Held Details				
Title		Name		
Organisation (if relevant)			Representing	
Address				
Postcode		Telephone		
Email				
Signature				
Date				

2. Your Publicly Viewable Details	
Name/Organisation	
Status in relation to site	
Representing (if applicable)	

3. Site Location			
Site Name			
Site address (inc. postcode if known)			
OS Grid Easting		OS Grid Northing	
Total Site Area		Developable Area	
<p>Please attach a 1:1250 scale Ordnance Survey map clearly showing the precise boundaries of the site. The area of the site you wish to be formally assessed should be enclosed by a red line. Any other relevant land under your ownership should be enclosed by a blue line</p>			

4. Site ownership (please mark as appropriate and/or provide details)				
Do you own the site?	Yes – sole owner	Yes – part owner	Yes – acting on behalf of the owner(s)	No
Is the site available?	Yes – immediately	Yes – In 5-10 years	Yes – 11+ years	No
Have you notified the landowner/other landowners that you have submitted the site?			Yes	No

5. Site Constraints (on site or at boundary – please mark as appropriate and/or provide details)					
Current/previous use					
Adjacent land uses					
Planning History					
Existing Infrastructure	Electricity	Gas	Mains Sewer	Mains Water	Telecoms
Access from Highway	Yes – Classified Road		Yes – Unclassified Road		No
Highway Works					
Ransom Strips					
Legal Issues					
Existing Occupiers					
Public Access/Rights of Way					
Wildlife Designations	Yes – Details:		Reports/Mitigation Strategy:		No
Ecology Designations	Yes – Details:		Reports/Mitigation Strategy:		No
Page 28					

<b>Unexploded Ordnance</b>	Yes – Details:	Reports/Mitigation Strategy:	No
<b>Land Contamination</b>	Yes – Details:	Reports/Mitigation Strategy:	No
<b>Heritage Designations</b>	Yes – Details:	Reports/Mitigation Strategy:	No
<b>Other Physical Constraints</b> (flooding, topography)	Yes – Details:	Reports/Mitigation Strategy:	No
<b>Infrastructure Constraints</b> (pylons, gas mains)	Yes – Details:	Reports/Mitigation Strategy:	No
<b>Other Knowns Issues/Constraints</b>			

6. Site Accessibility (please provide distance as measured from the middle of the site “as the crow flies” and utilise journey planner to determine walking time)			
Distance to closest bus stop (m/km)		Walking time to closest bus stop (mins)	
Distance to closest amenities (m/km)		Walking time to closest amenities (mins)	
Distance to closest rail station (m/km)		Walking time to closest rail station (mins)	

7. Previous site promotional work (please cross reference with Section 5 where relevant)		
Has any work been undertaken to promote the site and/or to overcome constraints?	Yes	No
If yes, please provide more details and copies of reports where available:		
Have any viability appraisals been undertaken?	Yes	No
If yes, please provide more details and provide copies of reports where available:		
Are there any specific or immediate intentions to start development?	Yes	No
If yes, please provide more details (such as Pre-application discussions)		
<p>Page 30</p>		

8. Proposal Details (please mark as appropriate and/or provide details)					
Description of Proposed Development					
Proposed Land Use	Residential	Employment	Retail	Mixed	Other
Site capacity/density (homes/floor space)			Details of mixed/other land uses		
Potential Development	For sale/marketed for development		Negotiations with developer	In control of developer	Ready for release by owner
Development time scales	Short term (within 5 years)		Medium term (6-10 years)	Long term (11-15 years)	Beyond (16+ years)
Development Timescale/Phasing (incl. build-out rates)					

9. Additional information
<div></div>

This page is intentionally left blank