

Cabinet

15 March 2022

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

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 seeks consent to adopt the proposed Housing and Employment Land Availability Assessment (HELAA) Methodology attached at Appendix 1. This methodology would 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 methodology would also be used by the other 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. The adoption of the methodology will enable the Council to proceed with a Call for Brownfield sites in order to update the evidence base to support a Local Plan review.

Recommendations:

Cabinet is recommended to:

- 1) Adopt the Housing and Employment Land Availability Assessment Methodology contained in Appendix 1 to the report.
- 2) Authorise the launch of a Call for Brownfield Sites to run for a period of ten weeks in Spring 2022.

List of Appendices included:

Appendix 1 – HELAA Methodology
Appendix 2 – Consultation Responses

Background papers:

None

Other useful documents:

Local Development Scheme 2022 (the timetable for the Local Plan and associated activities)

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?

The methodology has been endorsed by the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) who oversee statutory Duty to Co-operate matters for the sub-region

Will this report go to Council?

No

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

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, which forms a single Housing Market Area (HMA).
- 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 prepared 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 was finalised, it was 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 local plans.
- 1.8 Consultation took place between 10th November and 22nd December 2021, running concurrently between the six Local Authorities. Representations were jointly considered (Appendix 2) and the methodology amended accordingly. The final version was agreed at the CSWAPO (Duty to Co-operate) meeting on 9th February 2022, with each Local Authority to then take the final document through their own Councils for approval.
- 1.9 Coventry City Council has committed, through its Local Development Scheme (the project timetable for the Local Plan), to undertake a 'call for brownfield sites' which will be specifically focused upon encouraging brownfield sites to come forward for consideration. This updated methodology will greatly assist with this commitment.
- 1.10 The Call for Brownfield sites will be publicised in line with the Council's Statement of Community Involvement and will involve inviting landowners, agents and developers to put forward Brownfield sites for future development. Non-brownfield sites will not be considered or assessed during this process. At the conclusion of this process the Council will have a robust and upto-date evidence base for the possible provision of brownfield land towards development, which will be used in any future Plan Review.

2. Options considered and recommended proposal

- 2.1 Cabinet could adopt the HELAA methodology. This would constitute best practice and would be consistent with the other authorities in the Housing Market Area (HMA). It is therefore the recommended option.
- 2.2 Cabinet 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. 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 therefore recommend adopting the HELAA methodology in Appendix 1, in line with best practice and in conjunction with our neighbouring authorities in the HMA.
- 2.4 Cabinet could choose not to progress with the Call for Brownfield Sites; however this would be contrary to the recently adopted Local Development Scheme, and would also hinder the assessment of available brownfield land for future development. As such, this option is not recommended.

3 Results of consultation undertaken

- 3.1 A six-week consultation was undertaken between 10th November and 22nd December 2021 with the six Local Authorities running this concurrently. The representations, responses and changes to the methodology can be seen at Appendix 2 to the report.

4 Timetable for implementing this decision

- 4.1 Once adopted the methodology will be applied as part of the Call for Brownfield Sites process and therefore can be utilised with immediate effect.

5 Comments from the Chief Operating Officer (Section 151 Officer) 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 (EIA) 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

The methodology and subsequent Call for Brownfield Sites aims to identify sustainable options for development in line with the National Planning Policy Framework.

6.6 Implications for partner organisations?

Adoption of the methodology ensures a consistent approach to assessing sites with partners in Warwickshire as part of the statutory Duty to Co-operate.

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Service

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