

East Herts Council Report

Executive

Date of meeting: 11 February 2025

Report by: Councillor Vicky Glover-Ward – Executive Member for Planning and Growth

Report title: East Herts District Plan Review - Call for Sites Update

Ward(s) affected: All Wards;

Summary – This report details the outcome of the Call for Sites and sets out next steps in relation to the Strategic Land Availability Assessment.

RECOMMENDATIONS FOR EXECUTIVE to recommend to Council that:

- a) the Call for Sites submissions be noted and agreed for evaluation through the Strategic Land Availability Assessment; and
- b) the results of the Strategic Land Availability Assessment be reported in due course.

1.0 Proposal

- 1.1 It is a statutory requirement that policies in Local Plans should be assessed to see whether they need updating at least once every five years. The Council has previously agreed (via report to Executive 3 October 2023) that a review of the East Herts District Plan, 2018 (this Council's Local Plan), should be undertaken. An early part of that review involves a 'Call for Sites'. This process invites people to submit areas of land for the Council to consider whether these would be suitable to help meet the need for housing and other uses across a new plan period.
- 1.2 This report details the outcome of the Call for Sites recently undertaken and outlines the process that will follow the

consultation, including the completion of a Strategic Land Availability Assessment (SLAA).

2.0 Background

- 2.1 A report to Executive on 3 October 2023, entitled 'Review of the East Herts District Plan 2018', set out the statutory requirement that Local Plan policies should be assessed to see whether they need updating at least once every five years.
- 2.2 The National Planning Policy Framework (NPPF)¹ sets out that the planning system should be genuinely plan-led. Up-to-date plans should, inter alia, provide a framework for addressing housing needs and other economic, social and environmental priorities. To allow the Council to fulfil its statutory duties, it was agreed that the current District Plan does need updating.
- 2.3 To update the District Plan, a large quantity of underpinning evidence is required to support any strategy that the Council will ultimately choose to propose going forward.
- 2.4 One strand of this evidence base is a Call for Sites, which presents an opportunity for landowners, developers, agents, and site promoters to submit sites which they consider would have the potential either for future development in the district or could contribute towards nature enhancement and recovery in East Herts.
- 2.5 The initial Call for Sites element of the District Plan Review process was agreed through the same report to Executive on 3 October 2023 as detailed above. The Call for Sites consultation subsequently took place between Friday 5 July and Monday 30 September 2024, with a small number of sites also being submitted for consideration after the official consultation date had concluded. The consultation process was supported by a digital mapping platform, which allowed proposed sites and supporting

¹ [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/publishing-service)

information to be uploaded directly via the Council's website. This was achieved through partnership with an external company, Cadcorp, and was provided through the Government's PropTech Innovation Fund. The result of this innovation was that over 95% of responses to the Call for Sites consultation were made online, which saved a significant amount of officer time in processing the submissions.

2.6 This report provides an update on the outcome of the Call for Sites process to date, and to advise on the next steps to be undertaken in the assessment of sites submitted for the Council's consideration going forward.

3.0 Reason(s)

3.1 As stated above, the Government requires that up-to-date plans should, inter alia, provide a framework for addressing housing needs, along with other economic, social, and environmental priorities.

3.2 As the local planning authority, it is the responsibility of East Herts Council to ensure that sufficient homes are built every year to meet its housing requirement.

3.3 The housing needs that East Herts will be required to meet across the plan period of the District Plan Review are established via a 'standard method', which is a formula driven approach set by the Government through national planning practice guidance (PPG²) and enshrined in the NPPF, published 12 December 2024.

3.4 Paragraph 72 of the NPPF states that:

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

² [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/housing-and-economic-land-availability-assessment)

availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for five years following the intended date of adoption; and

b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.

- 3.5 Based on the 'standard method', the minimum housing figure that the Council will need to meet is 1,265 new homes per annum. Spread across the new plan period (which is currently being anticipated to run from 2028-2043) this represents a total of at least 18,975 dwellings to be identified during that timescale.
- 3.6 For the purpose of calculating Five Year Housing Land Supply (5YHLS), it should be noted that, in addition to the standard method figure (1,265), the NPPF requires a 5% buffer (moved forward from later in the plan period) to ensure choice and competition in the market. This means that the overall housing need requirement for 5YHLS purposes is currently $1,265 + 63 = 1,328$ new homes per annum.
- 3.7 The Council will be required to demonstrate that it has sufficient land supply to meet its housing needs. Housing requirements are therefore set out as targets in the District Plan to be met across the plan period. Specific site allocations are then made to meet those needs in the timescales in which they are likely to be required.
- 3.8 For these site allocations to be able to occur, the Council needs to be satisfied that it has sufficient, suitable land available in the right locations. This is where the Call for Sites comes in, as the submissions made through that process provide the Council with the opportunity to assess suitability and to gauge the potential available supply of land to provide new dwellings against its requirements. This will feed into the formation of the emerging development strategy which the Council ultimately chooses to

employ. This will, of necessity, be influenced by the availability of suitable land to enable its delivery.

- 3.9 The Council's Call for Sites yielded a total of 282 site submissions for consideration, including a small number of late inclusions.
- 3.10 To provide an overview of the proposals, a map of the district showing the location of Call for Sites submissions is included at **Appendix A**. It is important to note that not all site submissions propose built development on them and that proposals for solely green/nature related uses have also been put forward on 5 sites. To distinguish between these, sites proposing built development are illustrated in red, whereas submissions proposing only uses of natural or non-built form are shown in green.
- 3.11 A table of all of the Call for Sites submissions is included at **Appendix B**. This table breaks down Call for Sites submissions by settlement so that the submissions made for different parts of the district can be easily understood. The table contains important details regarding each site submission, including unique reference numbers, locational information, site area, developable site area, and the current and proposed use/s of the land.
- 3.12 **Appendix C** provides a greater level detail and information on a site-specific submission basis. Individual pages of the appendix each provide a location map and site area outline for every specific entry, alongside the key details of that submission.
- 3.13 In respect of all of the appendices detailed above, it is important to note that, with the exception of the attached reference numbers, these have been produced simply as a record of information submitted by parties through the Call for Sites process. No analysis or screening has been undertaken at this stage to check the accuracy of the information provided nor the suitability of these sites for potential development.

- 3.14 Now that the Call for Sites has been completed and the information for each submission collated and summarised, the Council will use the data to move on to the next stage in the plan making process. This next stage involves utilising the information provided to begin the preparation of a Strategic Land Availability Assessment (SLAA) for the district.
- 3.15 A SLAA is part of the proactive plan-making process and will help ensure that the Council can meet its requirement to maintain a continuous five-year supply of housing across the district going forward as well as detailing other proposed uses.
- 3.16 PPG states the purpose of a SLAA:

An assessment of land availability 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-making and decision-taking, 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.

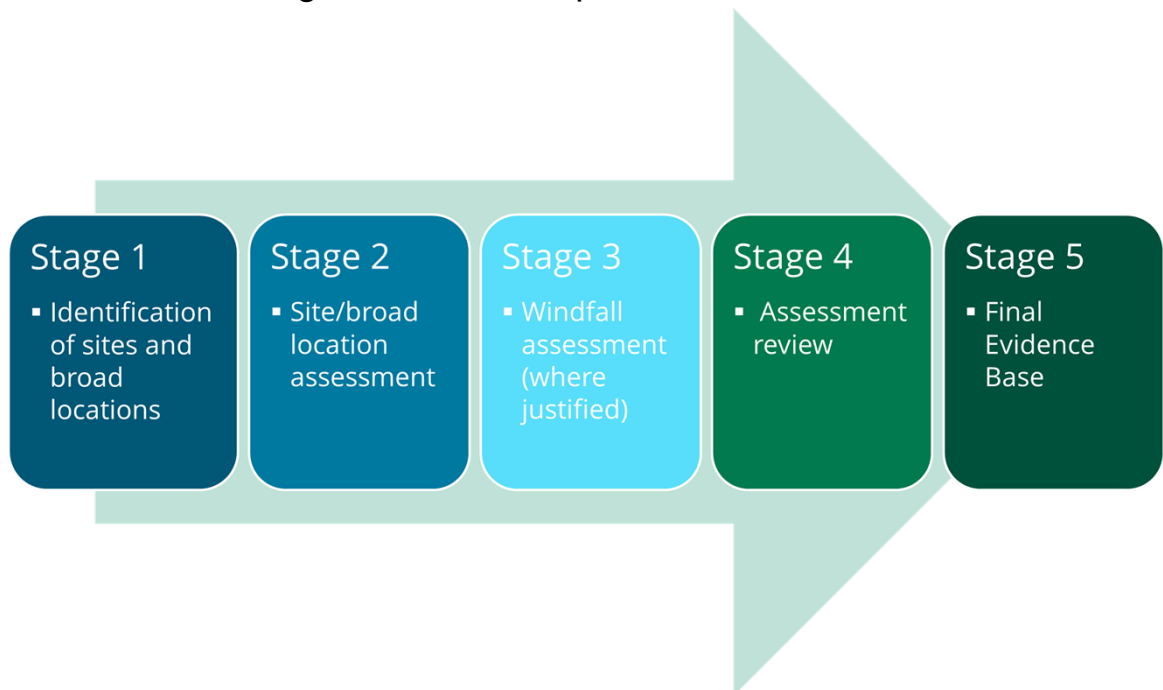
However, the assessment does not in itself determine whether a site should be allocated for development. It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's (or, where relevant, elected Mayor or combined authority) requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.

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) which is most appropriate.

An assessment should:

- *identify sites and broad locations with potential for development;*
- *assess their development potential; and*
- *assess their suitability for development and the likelihood of development coming forward (the availability and achievability).*

3.17 There are five stages in the SLAA process outlined in PPG:



3.18 In terms of the process as it is applied to East Herts, the purpose of the SLAA is to identify potential sites for development in the district across the new plan period and provide a high-level technical assessment as to whether these sites would be developable.

3.19 The SLAA will look at land supply for all types of development, acknowledging the wider spatial objectives of the planning system and could lead to the future identification of site allocations or broad locations for development.

3.20 It is important to note that the inclusion of a site in the SLAA is an assessment of whether a site **could** be developed; it does **not** make decisions about which sites **should** be developed.

- 3.21 It should also be noted that the SLAA is an initial high-level assessment used to inform the preparation of the District Plan and, as such, a detailed assessment of the accessibility and infrastructure requirements/impacts of individual sites is not undertaken at this initial stage. Further detailed evidence would be required to be submitted at a later stage in the site identification process.
- 3.22 The final outcome of the SLAA will be a technical report listing each site accompanied by an identifying Ordnance Survey map. The SLAA will include an assessment of the likelihood of whether a site could be developed. This information will then feed into the Council's housing trajectory to help maintain a continuous supply of housing going forward.
- 3.23 A flow chart has been produced by the Government within the PPG which illustrates the route to be followed through the identification of sites and broad locations process. A graphic illustration of this is included at **Appendix D**.
- 3.24 In terms of the SLAA process, even if some of the submissions do ultimately become allocated within the District Plan Review, each site would still need to come forward for development through the planning application process, where any constraints on development would be considered in greater detail.
- 3.25 It should also be noted that sites not included in the SLAA assessment process may also still come forward for development through the planning application route either during or following the District Plan Review's adoption process.

Next Steps

- 3.26 The Planning Policy Team will now begin the process of an overview evaluation of each of the 282 Call for Site submissions as part of a Stage 1 assessment. This high-level process will involve the consideration of a number of issues as outlined in the PPG to:

- *ratify inconsistent information gathered through the call for sites and desk assessment;*
- *get an up to date view on development progress (where sites have planning permission);*
- *obtain a better understanding of what type and scale of development may be appropriate;*
- *gain a more detailed understanding of deliverability, any barriers and how they could be overcome; and*
- *identify further sites with potential for development that were not identified through data sources or the call for sites.*

3.27 The PPG details the sort of information that can be recorded as part of the Stage 1 process (or checked if they were previously identified through the data sources and call for sites). These matters include:

- *site size, boundaries, and location;*
- *current land use and character;*
- *land uses and character of surrounding area;*
- *physical constraints (eg access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);*
- *potential environmental constraints;*
- *consistency with the development plan's policies;*
- *proximity to services and other infrastructure, such as public transport;*
- *where relevant, development progress (eg ground works completed, number of units started, number of units completed); and*
- *initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.*

3.28 The Planning Policy Team will also carry out site visits to the submitted locations to assist in this evaluation, as appropriate.

3.29 It should be noted that the PPG also makes it clear that “at this stage, there may be some sites which, when taking into account

national policy and designations, it will not be appropriate to carry out these more detailed assessments for, where it is clear that they will not be suitable for development. The initial surveys need to be proportionate, with a more detailed assessment being made at Stage 2”.

- 3.30 Following the completion of Stage 1, initial high-level SLAA evaluation, the results will be reported back to members for consideration prior to undertaking Stages 2 to 5, which will occur subsequently.

4.0 Options

- 4.1 The Council could choose not to consider the outcome of the Call for Sites and progress to a SLAA, but this would go against Government policy and would undermine the Council’s position in terms of successfully bringing forward the revision of the East Herts District Plan, 2018.

5.0 Risks

- 5.1 The risks associated with the Call for Sites would be that insufficient suitable sites are submitted to enable the Council to meet its housing targets; however, this would not become apparent until after the full SLAA process has been concluded.

6.0 Implications/Consultations

- 6.1 The Call for Sites public consultation was undertaken between Friday 5 July and Monday 30 September 2024.
- 6.2 The Call for Sites forms an integral part of the plan-making process.

Community Safety

There are no community safety implications arising from this report.

Data Protection

There are no data protection implications arising from this report.

Equalities

There are no direct equality, diversity, or inclusion implications in this report. An Equalities Impact Assessment (EqIA) will be carried out of the District Plan Review in accordance with The Equality Act 2010.

Environmental Sustainability

The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and infrastructure in a sustainable manner.

Financial

The District Plan Review is being produced from existing budgets, including reserves that have been safeguarded for this purpose.

Health and Safety

There are no health and safety implications arising from this report.

Human Resources

There are no human resources implications arising from this report.

Human Rights

There are no human rights implications arising from this report.

Legal

There are no legal implications arising from this report.

Specific Wards

All

7.0 Background papers, appendices, and other relevant material

7.1 Appendix A – Map of Call for Sites Submissions

7.2 Appendix B – Table of Call for Sites Submissions by Settlement

7.3 Appendix C – Overview of Individual Call for Sites Submissions, including Location Plan, Site Area and Key Information.

7.4 Appendix D – PPG Housing and Economic Land Availability Assessment Flowchart

Contact Member

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