

EXAMINATION OF THE YARPOLE GROUP NEIGHBOURHOOD DEVELOPMENT PLAN 2011 to 2031

Examiner's questions for Herefordshire Council with regard to the provision of affordable housing within the Leominster HMA, specifically within the rural areas.

Background

I have identified the provision of affordable to be a main issue in my examination of the Yarpole Group NDP. In the introduction to my questions on the issue to be addressed by the Parish Council, as the Qualifying Body, I have summarised the policy position and made reference to the evidence base for the adopted Herefordshire Core Strategy (HCS). In particular, I make reference to the information contained in the 'Herefordshire Local Housing Market Assessment- 2012 Update' GL Hearn November 2013, although there is also a 2014 update and a paper by Herefordshire Council 'Rural Housing Background Paper March 2013'.

I have identified that of the HCS 'pro-rata' requirement for a minimum of 48 dwellings in Yarpole 2011-2031 the GL Hearn work suggests that 25% should be affordable, amounting to 12 or 13 dwellings although HCS Policy H1 might suggest that in the 'Northern Rural Housing Value Area' the requirement is 40% (see question 1). In view of recent planning decisions, most particularly on the area allocated at Yarpole under NP Policy YG10, there is now no realistic prospect that any development on sites remaining allocated in the plan or within the settlement boundaries will yield any affordable housing. The only possibility would be through exception sites and I have asked the QB (Question 6 c.) for more information on progress in this respect.

Clearly, the GL Hearn work is at the HMA level and it does not necessarily translate directly to the neighbourhood plan level. There is a parish level local housing needs survey dating from 2014 which identified a need for 5 affordable homes in 3 years, not necessarily within the parish.

Questions

1. For clarification. HCS Policy H1 refers to different 'housing value areas' with different targets for the percentage of affordable housing to be provided on sites within those areas, as shown on Figure 5.1 on page 120. From that plan Yarpole appears to be within the 'Northern Rural' area, not Leominster. Part 2 of Policy H1 sets a target of 40% provision in the Northern Rural housing

value area. Is that correct? If so, what was the evidential basis for such a figure? (*Tables 61 and 62 in the GL Hearn study together indicate a requirement for 25% affordable housing in the rural parts of the Leominster HMA*)

Answer: That is correct. The evidence behind the targets for affordable housing set out in Core Strategy policy H1 are the economic viability assessments undertaken to support the preparation of the Core Strategy. Links to them are attached below.

https://www.herefordshire.gov.uk/downloads/download/228/economic_viability_assessment_planning_documents

https://www.herefordshire.gov.uk/directory_record/2080/economic_viability_assessment_2014

https://www.herefordshire.gov.uk/directory_record/2072/affordable_housing_viability_study_2010

It may be useful to reference the HCS Inspectors Report and in particular the section on affordable housing (paras 32-40). Here the Inspector indicate that it would not be realistic to achieve the total requirement for affordable housing.

She also recognises in para 37 that the thresholds set out in Policy H1 are justified by the evidence. The only other point about the implementation of policy H1 is that we can only achieve affordable housing on qualifying sites, in rural areas the vast majority of housing is delivered on sites below the threshold making it very difficult to achieve the need identified in the HMA.

https://www.herefordshire.gov.uk/downloads/file/1862/local_plan_inspectors_report

2. What approach is being taken in Herefordshire to the provision of affordable housing within individual neighbourhood planning areas? Is there an expectation that all NPs should make provision for the minimum level of affordable housing required under HCS policy H1? Is any variation from the level of provision identified in the HCS within individual neighbourhood plans expected to be supported by parish based needs surveys?

Answer: As there are no specific affordable housing targets within the HCS policy, parish councils are only provided with the overall proportional growth requirement target for that parish area.

There are varying levels of provision within individual NDPs. Some parishes are including sites of 11 and above which would then trigger policy H1, some have included exceptions or specific sites for affordable or CRtoB schemes and as some have included smaller sites or have limited housing to account for (either because of existing commitments or small proportional growth numbers) there would be little opportunity for affordable housing unless under the exceptions policy H2.

Parish based needs surveys are no longer undertaken by Herefordshire Council

3. What is the current position on the provision of affordable housing a) within Leominster itself and b) in the rural parts of the Leominster HMA? How does it compare with the HCS requirements? Has any provision be made in neighbourhood plans for the areas around Yarpole, in particular at Luston?

Answer: There are no specific affordable targets in respect of HCS policy for Leominster and the rural parts of the Leominster HMA other than the requirements set out in policy H1, which applies to Housing Value Areas rather than HMA, and policy LO2 at Leominster (for the strategic site).

In the period that the policies of the HCS have been in operation (adoption in Oct 2016) affordable housing has been delivered on qualifying sites in accordance with policy H1 of the plan. However, relatively few qualifying sites have been advanced in this period.

At Leominster the strategic site, which will deliver the largest proportion of affordable housing, is yet to reach planning application stage. Elsewhere in the Town some 158 affordable dwellings have been permitted on qualifying sites.

In rural areas around 31 dwellings have been permitted on 4 qualifying sites in the rural parts of the Leominster HMA.

4. Is there any information available on the provision of housing on rural exception sites within the Leominster HMA since 2011?

Since 2011 the following rural exception sites in Leominster HMA have come forward.

1 scheme at Weobley for 8 dwellings

1 single dwelling at Leintwardine

1 scheme for 14 dwellings at Orleton

1 scheme for 20 dwellings at Leintwardine

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23 November 2017