

Progression to Examination Decision Document

Neighbourhood Planning (General) (Amendment) Regulations 2012

Name of neighbourhood area	Kington Area Neighbourhood Area
Parish Council	Kington Town Council; Kington Rural Parish Council and Huntington Parish Council
Draft Consultation period (Reg14)	6 June to 17 July 2017
Submission consultation period (Reg16)	3 October to 14 November 2018

Determination

Is the organisation making the area application the relevant body under section 61G (2) of the 1990 Act		Yes
Are all the relevant documentation included within the submission <ul style="list-style-type: none"> • Map showing the area • The Neighbourhood Plan • Consultation Statement • SEA/HRA • Basic Condition statement 	Reg15	Yes
Does the plan meet the definition of a NDP - 'a plan which sets out policies in relation to the development use of land in the whole or any part of a particular neighbourhood area specified in the plan'	Localism Act 38A (2)	Yes
Does the plan specify the period for which it is to have effect?	2004 Act 38B (1and 2)	Yes
Are any 'excluded development' included? <ul style="list-style-type: none"> • County matter 	1990 61K / Schedule 1	No

<ul style="list-style-type: none"> Any operation relating to waste development National infrastructure project 		
Does it relation to only one neighbourhood area?	2004 Act 38B (1and 2)	Yes
Have the parish council undertaken the correct procedures in relation to consultation under Reg14?		Yes
Is this a repeat proposal? <ul style="list-style-type: none"> Has an proposal been refused in the last 2 years or Has a referendum relating to a similar proposal had been held and No significant change in national or local strategic policies since the refusal or referendum. 	Schedule 4B para 5	No

Summary of comments received during submission consultation

Please note below are summaries of the response received during the submission consultation. Full copies of the representations will be sent to the examiner in due course.

Herefordshire Council Comments	
Environmental Health	<p>Site K1: A review of Ordnance survey historical plans indicate a railway track (a potentially contaminative use) has historically run adjacent to the proposed site. It is possible that unforeseen contamination may be present.</p> <p>Site K3: The proposed site is located on an area of land which has historically been used as a Gas Works, Petrol Station and builders yard. (all potentially contaminative uses).</p> <p>Site K5: A review of Ordnance survey historical plans indicate the proposed site is situated adjacent a former Textile manufacturer site. It is possible that unforeseen contamination may be present. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.</p> <p>Site K6: A review of Ordnance survey historical plans indicate the proposed site is situated adjacent a former Builders Yard site. It is possible that unforeseen contamination may be present. Consideration should be given to the possibility of encountering contamination as a result of its former use and specialist advice be sought should any be encountered during the development.</p> <p>Site: KH01 The proposed site is located on an area of land which has historically been used as military land (a potentially contaminative use). The site's historic potentially contaminative use will require consideration prior to any development.</p>

Housing	Happy with contents of the plan.
Strategic Planning	Confirm conformity with the Core Strategy. Please find full comments in appendix 1.
External Consultees	
Coal Authority	No specific comments to make on the plan.
Welsh Water	<p>Public Sewerage: There do not appear to be any issues in the proposed development site connecting into our combined public sewer in the adjacent Kingswood Road.</p> <p>Water Supply: Given the size of the proposed development site and the small diameter distribution water main in the adjacent Kingswood Road, a hydraulic modelling assessment (HMA) of the water supply network may be required in order to understand where a connection can be made and if any upsizing is required. Potential developers can commission Welsh Water to undertake a HMA, and fund any improvements via the Requisition provisions of the Water Industry Act 1991</p> <p>Wastewater treatment works (WwTW) Our Kington WwTW is currently overloaded and there are no improvements planned within our current Capital Investment Programme (AMP6 – 1st April 2015-31st March 2020). An improvement scheme will form part of our submission to the Industry Regulators for the next Capital Investment Programme (AMP7 – 1st April 2020- 31st March 2025).</p> <p>As such, should a developer wish to progress this site in advance of our future Regulatory Investment they will need to fund the improvements themselves, firstly by commissioning Welsh Water to undertake a feasibility study of the WwTW, before entering into a Section 106 Agreement (of the Town & Country Planning Act 1990) to pay for the improvements required.</p> <p>Green & Blue Infrastructure and Design Principles – Open Space Welcome the inclusion of sustainable drainage systems within the proposed development site. Controlling and managing surface water discharges from new development sites by implementing sustainable drainage systems can minimise surface water run-off and flooding, and ensures no surface water connects to our public sewerage network and WwTW.</p> <p>Our Core Strategy representation advised that the level of development proposed for Kington over the Core Strategy period to 2031 could not be accommodated without upgrading the wastewater treatment works (WwTW).</p> <p>In considering the requirements for schemes to be included within our Capital Investment Programme (Asset Management Plan), we require some certainty in terms of growth and site development proposals. Information contained in Core Strategies and Neighbourhood Plans help guide where investment is required, subject to Regulatory approval from Ofwat and affordability. Other factors such as the current operation of the WwTW are also taken into account. There are no upgrades planned for Kington WwTW within our current Capital Investment Programme AMP6 which runs from 1st April 2015 – 31st March 2020.</p> <p>We cannot give any guarantee that there will be a scheme in our next Capital Investment Programme AMP7 which runs from 1st April 2020 – 31st March 2025, but a scheme will certainly be put forward for consideration.</p> <p>Should potential developers wish to progress a development site in advance of our future Regulatory Investment they will need to fund the improvements themselves, firstly by commissioning Welsh Water to undertake a feasibility study of the WwTW, before</p>

	entering into a Section 106 Agreement (of the Town & Country Planning Act 1990) with Welsh Water and Herefordshire Council to pay for the improvements required.
Environment Agency	<p>We previously raised concern on the Reg 14 submission with regards to sites located partially within Flood Zones 2 and 3, the medium and high risk zones respectively. Post Reg 14 consultation these sites have been subject to further discussion, including liaison with the Environment Agency, and we note that amendments have been made to the Reg 16 submission, specifically the removal of allocation K6.</p> <p>The allocation on Land North of Arrow View has been retained although it is shown to fall partially within Flood Zone 2 of the River Arrow. Whilst it is recognised that the site could accommodate approximately 15 houses on land at a low risk of flooding any forthcoming planning application for residential development of this site will need to be accompanied by a Flood Risk Assessment, in line with National Planning Policy and your own Policy SD3, and this should be referenced within Policy KANP H3.</p>
Historic England	Historic England considers that the Kington Draft Neighbourhood Plan exemplifies “constructive conservation” and constitutes a very good example of community led planning. All those who have clearly worked extremely hard in drafting the Plan are to be congratulated on the end product”
National Grid	National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.
Sport England	<p>The tennis courts at Halo Lady Hawkins School have been excluded from the green space shown on plan 1 with the grass playing fields included. The tennis courts are functionally and locationally part of the playing field and should therefore form part of the green space that is to be protected by the policy in the plan, as Sport England would consider this to be part of the whole playing field area at this site and would apply our policy accordingly.</p> <p>The bowls green at Park Green has been omitted, it would be appropriate to include this within the green space annotated on plan</p>
External responses	
C.Giles Resident	<p>Housing- the major site proposed for Kington has too many houses all in one block again - contrary to what Kingtonians have asked for from the first consultations onwards - which was for small developments.</p> <p>Kington development area - I had not truly understood the question about this in the previous questionnaires and the impact it would have on housing. Having read the supporting rationale for limiting the development zone I note that it is based largely on findings in the past. Surely we now need to be looking at the current feedback and to the future, and extend it so that the housing can indeed be in small developments in other parts of the town rather than extending what is already a large development.</p> <p>Infrastructure - improvements to Kington must be made before extra stress is added by increased housing/population - necessary support services returned to Kington, schooling, medical staff (including dentists and chemists), police, all social services and council information officers returned to Kington (Leominster is not accessible unless people drive or can afford to) etc and provided by people not just computers – they do not do the necessary job. But more to the point, improve the water/sewage urgently and ahead of developments.</p> <p>Type of housing - does it really reflect the requirements of the population, current and forecastable - a) for retired people b) for self-employed people 2 (live-work units)? I am glad to see affordable housing is mentioned, but am not sure if it is specified as a requirement of any development adequately to ensure it actually happens, rather than just more 3-4 bed executive housing. I would wish to see a) and b) specified too.</p>

	<p>Housing environmental impact - I am very supportive of requiring for any new project photovoltaic panels, solar thermal panels, eco insulation, green spaces to provide lungs to the town and new eco materials - to the benefit of the individuals and the town/area.</p>
<p>Concerned residents</p> <p>Jill Synnock David Skyrme Laura Skyrme Georgina Synnock Russell Synnock Elizabeth Synnock Lynden Synnock Claire Synnock Gill Simcock I. Caney J. Caney S. Caney R. Caney A. Borg M.Neville E. Neville E.Neville T.Neville N. Ellin S. Ellin M.Osborne W.Osborne R.Pitman P.Pitman H.Osborne M.Dalsgaard D.Osborne D.McAdam T.McAdam R.Polhill S.Polhill L.Polhill B.Polhill N.Lane D.Lane A.Taylor M.Taylor K.Durkin J.Durkin M.Cheshire C.Alexander A.Alexander A.Mulnier R.Mulnier B.Mulnier G.Mulnier C.Youings M.Youings</p>	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> • Lack of communication to the Kington Residents throughout the NDP process and decisions made by steering group members. Process has been unfairly loaded against residents who will be affected. • Kington residents have not been able to ask the consultants how they reached their conclusions. Residents haven't been involved in the decision making process. • At the meeting 100% of residents objected sites K12/K13. • Object to the K10 site being allocated as greenspace, lack of consultation when this was selected. This site is not realistic, has previously been refused planning permission uncertainty with site access, Kington Park has restricted covenants. • K18/K19 was rejected from discussion. • Object to residents in Huntington, Kington rural and Lower Harpton residents voting on housing development in Kington Town. They should vote on their own Neighbourhood Plans, so that votes are not weighted against Kington residents • Questions the derivability of the Kington Area NDP. • Publication of the NDP at all stages has been inadequate. • Would you please add the following names to the written comments submitted to the Council Office on 13th November 2018. (Receipt 74)
<p>Mr G Bluett</p>	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p>

	<ul style="list-style-type: none"> • Concerned about scale of development and impact on towns existing infrastructure. • The housing sites in south Kington is inappropriate and risks destroying character of town. • Object to the settlement boundary of Kington. • Existing green space next to the allocated site is at risk, from the proposed housing sites. • Concerned about the traffic impact from 100+ houses in the town and potential health and safety impact and the impact on local wildlife habitats. • Alternative site access to the plan has been ignored. • Existing infrastructure needs to be improved in Kington before any substantial development take place.
<p>Gladman Developments Ltd</p>	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> • Gladman is concerned that the plan in its current form does not comply with basic conditions (a) <i>Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i> and (d) <i>The making of the order contributes to the achievement of sustainable development.</i> • The plan does not conform to national policy and guidance and in its current form does not contribute to the achievement of sustainable development. • Suggest sufficient flexibility is provided in the policies of the plan to safeguard KANP from conflicting with future development proposals. • Concerned with the wording of policy ENV1, this policy needs to consider planning balance. Questions the robustness of evidence to support landscape and view protection. • Policy SB1, having a settlement boundary prevents sustainable development coming forward. • Policy H5-Concerned that criteria in this policy are overly prescriptive and limits sustainable development coming forwards. Delete reference to The Greater London Authority Space Standards (2006). • Policy LGS1-The evidence provided does not comply with para 77 of the NPPF greenspace allocated is not supported by robust or detailed evidence.
<p>Ian Caney/Joan Caney x 3 Resident</p>	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> • Plan badly advertised, does not involve a cross section of Kington residents. • Concerned process has not been transparent, it appears decisions were made by two persons in the steering group. • Object to K6 and K7 goes against the 2013 SHLAA report. • Concerns of the safety and access onto these potential sites. • Concerned to residents in Huntington, Kington rural and Lower Harpton residents voting on housing development in Kington Town. • Concerned about the KANPlan questionnaires and general consultation process. • No benefit or advantage in Kington Town Council identifying the major sites for 100+ dwellings. In my opinion it would be better leaving the decision to market forces with developers deciding in the future whether the project would be viable or not. At least then, any decision could be made in the future and not have the present situation of homeowners having their properties blighted by the Kington Area Neighbourhood Plan. • Waste of time and money to "identify" major sites which do not have a proven demand and are unlikely to be developed because of the financial costs involved. It is understood such mass development could not be built for 10-15 years because improvements need to be made to infrastructure. By that time other suitable site may become available for consideration.

	<ul style="list-style-type: none"> Residents are not aware of regulation 16 consultation, site notices poorly placed in the area feels that the notices do not draw attention.
J and P Turner Resident	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> Disappointed not to be involved in the Neighbourhood Plan. 6.1 "Provide linked, circular safe cycling and walking routes around Kington and the wider area" One of the main wishes from any public consultation has been the desire for a riverside walk along the Arrow (Policy KG1 and KANP Objectives 1 and 6) and that opportunity was available to the KANP to achieve such a walking route if they had consulted us. KANP Objective 15. We have a 15KwH Micro Hydro system using our 19th Century Turbine so find it odd that the KANP have not been to see it or ask for our help in other projects. How will they provide support for schemes Feel that the KANP should have researched into why this is the case and put forward proposals to take it out of the at risk register. We have three listed buildings on site and all are in a good state of repair. They are members of the Kington Chamber of Trade and note that the only meeting that a representative of the KANP came to was on 21st February 2017 regarding traffic in the High Street (page 24 consultation). As far as we are aware that was the only discussion between the two groups. We are very concerned by the KANP KTC 1 - Kington Town Centre policy in the Basic Conditions Statement as it appears to contradict itself and would cause problems. This is in regards to traffic, and it being deterred using the high street. We do not believe that the consultation process has been carried out according to the Neighbourhood Plan Regulations and Guidance.
MJ Turner Resident	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> Objection on the consultation process when designating the Headbrook site. Green spaces not voted on separately, Headbrook site never asked if they wanted it to be designated as green space. Should not be allocated as greenspace as it does not fit in with the regulations governing local green space. No room for manoeuvre if one of the large scale site fails to succeed. Plan is too restrictive for development. Flaw in referendum, infringing human rights as people in the rural areas can vote on Kington Town Council. Heavily weighted against Kington residents. Steering group have not taken notice of reservations in response to the survey. Publicity for regulation 16 consultation is poor.
PDA planning on behalf on M Turner	<p>For the full comments, please refer to the Reg 16 responses, these can be found on the Hereford Council website. Summary is below.</p> <ul style="list-style-type: none"> Objects to the inclusion of a substantial area of private land, 3.8 hectares/9.5 acres in extent and commonly known as the Headbrook Land (HL) and owned by Mr Turner, which has been shown on the draft Proposals Map as being designated as an area of Local Green Space (LGS). This is contrary to NPPF and Core Strategy policies, there is a lack of evidence of this site being put forward with lack of evaluating alternative sites. Kington TC and the NPG failed to respond to draft housing proposals by M Turner, they have had no real contact with M Turner as suggested in the consultation statement. Was not consulted or engaged in in the site Our site (Headbrook site) should be considered as a housing site in the NDP. The Headbrook site is privately owned with no public access and is primarily used for sheep and cattle grazing. Does not requirements as set out in para 77 NPPF. Why were other significant areas of greenspace (Mill St Recreation Ground) not considered for LGS designation.

	<ul style="list-style-type: none"> • Land has previously identified in the SHLAA, being appropriate for future residential development. • Plan is flawed and does not fulfil the requirements set out in the Local Plan and NPPF. • 89% of the housing allocations are considered unsuitable for development or potential for delivery is questionable. • KANDP have had minimal exposure to the wider community or to local landowners. Can't find any evidence of the NPG working with the landowners. •
Kington Park Residents Association	<ul style="list-style-type: none"> • Concerns focus upon the proposed road access route onto the Old Eardisley Road for the development areas described as K6 and K7 (formerly K12 and K13). • The proposed 100 house development is out of scale, is lacking sufficient local infrastructure to support it, and is not a benefit to the town at present, we have not opposed the principle of the development. • Strongly opposed to the proposed road access route, which is shown to go through the open space and play area between Kington Park and the properties that face onto Headbrook. Our reasons are: <ul style="list-style-type: none"> • Loss of Public Open Space and Play Area. • Safety Issues, impact on traffic. • The distance from Headbrook Rd junction with Old Eardisley Rd to the proposed new access road is less than 30 metres. The Old Eardisley Road is already busy with about 100 houses feeding onto it. In addition, there is Kingdom Hall at the end of the road and Masonic Hall on the junction with Headbrook. These two halls bring regular additional traffic and in the case of Masonic Hall cars are parked all the way up Old Eardisley Road (see photograph 1 below). The petrol garage on Headbrook is also close to the Old Eardisley junction and traffic entering the petrol station again often backs up towards this junction (see photograph 2 below). • For the houses that feed onto the Old Eardisley Rd this is the only pedestrian route into Kington. The creation of a new road onto it with the additional traffic (up to 200 cars) will be a major safety issue to children. 6. We understand that the County Council has already refused the creation of a road from the rear of Ian Jones Tyres and onto the Old Eardisley Road (Application number DMNW/092216/F). Reasons include "proposal for development on land allocated as open space in accordance with the Herefordshire Unitary Development Plan"; "will have a detrimental impact on the amenity of the adjacent dwelling" and "fails to demonstrate... satisfactory highway safety standards". • Public Consultation within Kington. No-one supported the proposed access to the K6/K7 development through the play area/open space. In fact, it was strongly opposed and the Town Council were urged to find an alternative route. This strong opposition by the people of Kington has been completely ignored • Policy justification for proposed access for K6/K7 developments is limited to: <i>9.4.30 There will be no vehicular access on Kingswood Road; but a new access point will be taken from Old Eardisley Road, to the east of the site. However, in order to deliver this new access, it might be necessary to upgrade the junction of Headbrook and Old Eardisley Roads.</i> The main KNDP gives no justification for this route; has failed to recognise the safety issues associated with it and has made no reference to and ignored local unease and opposition. • Equally, although other possible access routes for these new developments were put forward at the public meetings the absence of any reference to them in the KNDP makes it clear that none were given serious consideration or explored.
P Kirby Resident	<p>I own the parcel that the Plan refers to as K6 and to which policies KANP1 and 2 in particular refer. I confirm that it is my intention to bring the land that I own forward for development during the plan period. Should you have any queries or require any further information then please do not hesitate to contact me.</p>

Tony Bennett Resident	Surely the plans cannot work as the existing sewer system is over worked the schools are full there isn't enough jobs

Officer's Appraisal

This plan has met the requirements of the regulations as set out in the table above.

The plan includes settlement boundary for the identified Market Town of Kington and RA2 settlement of Hergest. The settlement boundary for Kington Town and Hergest have taken into account existing commitments and proportional growth requirements. The proportionate growth target for Kington Town is around 200 dwellings, the parish already has 32 commitments and 16 completions. The site allocations in Kington Town add up to 131, these will be delivered on 7 sites. Windfall from April 2011 to April 2018 is 16, so it is reasonable to expect Kington Area to achieved 26 in a 13 year period.

If the housing sites and windfalls were delivered this will create 205 houses in Kington. Kington rural has a housing growth target of 32, 2 have been completed and 6 have been granted planning permission this leaves a residual figure of 24. There is one site allocation in Hergest which is expected to site 15 houses, the remaining figure of 9 is expected to be met by windfall. No concern has been raised from internal consultees with regards to the ability of the plan to meet the required minimum proportional growth contributing towards the deliverability of the Core Strategy.

Overall, nineteen responses have been received during the Regulation 16 Consultation;

Three have been received by internal service providers and six from statutory consultees. There have eleven comments from various residents or consultants on behalf of residents, one of support and ten objections. The ten objections received by local residents and developers to Kington Neighbourhood Area Plan are summarised below.

- Land south of Kington K6/K7-Too many houses on one site highway access and safety / landscape concerns.
- Loss of greenspace/ open space from the proposed development of K6/K7
- Objection to large scale housing sites.
- Objection to the settlement boundary in Kington.
- Impact of large scale housing growth to existing infrastructure/ traffic impact and services.
- Environmental impact caused from additional housing.
- Lack of communication/ engagement/publicity during consultations.
- Allocating the Headbrook site (K10) as greenspace.
- Process of allocating sites and greenspace.
- Plan is restrictive of housing growth/ policies could be more flexible.

The NDP includes the two large scale sites K6 and K7 to accommodate around 100 dwellings, this has raised local objection. However this allocation is in line with the target set out in policy KG1 of the Core Strategy. Kington Area NDP has gone through a site selection process based on technical evidence along with public consultations. No specific comments regarding K6 and K7 sites have been made by housing, EHO or Strategic Planning. Strategic Planning raised no objections to the plans allocated sites and confirm that the policies within the plan are in general conformity with the Core Strategy.

External responses from technical bodies such as Natural England, Historic England, Welsh Water and National Grid and have raised no objection to the regulation 16 draft plan but have provided constructive comments. It is considered that there are no fundamental issues relating to this plan which would prevents its progress to examination.

Programme Director's comments

Decision under Regulation 17 of the Neighbourhood Planning (General) Regulations 2012.

The decision to progress to appoint an examiner for the above neighbourhood plan has been

Approved



Richard Gabb

Programme Director – Housing and Growth

Date: 7/12/18

Neighbourhood Development Plan (NDP) – Core Strategy Conformity Assessment

From Herefordshire Council Strategic Planning Team

Name of NDP: Peterstow- Regulation 16 submission version

Date: 08/06/18

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
PTS1- Promoting Sustainable Development	SS1	Y	
PTS2- Conserving the Landscape and Scenic Beauty of the Parish	SS6; LD1; LD4	Y	
PTS3- Enhancement of the Natural Environment	SS6; LD2	Y	
PTS4- Protecting Heritage Assets	SS6, LD4	Y	
PTS5- Development within Peterstow Conservation Area	SS6, LD4	Y	
PTS6- Foul and Storm Water Drainage	SD3, SD4	Y	
PTS7- Protection of Peterstow Common as Local Green Space	N/A	Y	
PTS8- Design and Appearance	SS6, LD1, LD2, LD4, SD1	Y	
PTS9- Sustainable Design	SS6, SD1, SD2	Y	
PTS10- Traffic Measures within the Parish	SS4, MT1	Y	
PTS11- Highway Design Requirements	SS4, MT1	Y	
PTS12- Housing Development in Peterstow Village	SS2, RA2	Y	
PTS13- Housing Sites in Peterstow Village	RA2	Y	

Draft Neighbourhood plan policy	Equivalent CS policy(ies) (if appropriate)	In general conformity (Y/N)	Comments
PTS14- Protection and Enhancement of Community Facilities and Services	SC1	Y	
PTS15- Contributions to Community Facilities	SC1	Y	By seeking smaller scale infill housing developments, obtaining these contributions may prove difficult without the economies of scale that larger schemes provide.
PTS16- Small and Home Based Business	SS5, RA5, RA6, E3	Y	
PTS17- Polytunnel Proposals	N/A	Y	
PTS18- Renewable and Low Carbon Energy	SD2	Y	

Other comments/conformity issues:

Please provide a contents page for the appendices

Update references to the 2018 NPPF

Table 1

Core Strategy Target 2011-2031 "around 200 dwellings" Completions at April 2018	16
Planning permissions at April 2018 32 (this includes the allocation K3 for 10 dwellings which has planning permission)	
Site allocations	131
Windfalls	26
Total by 2031	205

Kington town windfall

Year	Net completion windfalls
2011/12	5
2012/13	0
2013/14	5
2014/15	3
2015/16	1
2016/17	0
2017/18	<u>2</u>
Total	16

The above pattern shows that there were on average 2 windfalls per annum. With thirteen years remaining it would be reasonable to expect to see 26 dwellings coming forward as windfalls.