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(Please reply to Banbury office)

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Programme Officer:
Rosalind Fallon
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By Email: programme.officer@herefordshire.gov.uk

Dear Ms Fallon

Herefordshire Council Core Strategy Examination

I write in response to the 'Update of Herefordshire Local Plan – Core Strategy Examination in Public Five year housing land supply (2015-2020)' dated March 2015.

My comments are as below:

Strategic Urban Extensions

The Council have also included 2265 dwellings from Strategic Urban Extensions SUE's within the five year supply, although this approach is enabled by national policy, the assumptions made regarding start times and build out rates for these sites must be treated with extreme caution. At the time of writing, none of the sites outlined in Figure 4 of the March 2015 report have the benefit of a planning permission, and only two sites are subject to submitted applications. The remaining six sites are not subject to a planning application submission.

Given this fact, and the need for the delivery of in some cases substantial infrastructure and environmental mitigation, the projection made for the delivery of first dwellings on these sites to be by 2016/17 is highly aspirational. It seems very optimistic to expect delivery on these sites of 415 homes by 2016/17, only a year following the anticipated adoption of the Plan and a further 700 homes in 2017/18. To expect that a large site which is not even yet subject to a planning application to: receive outline planning permission; obtain reserved matters planning permission / or detailed application; agree a design code (which is likely to be required for large sites); discharge pre-development conditions; provide infrastructure; start construction on site; and then deliver completed units within two years, is very unrealistic. As set out below, a 3.5 year lead in is more realistic. I note that the SHLAA 2012, Appendix 13b identifies lead in times for the strategic sites at Hereford of between 4 to 10 years.

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The issue of lead in times for sites was recently considered in Land off Hind Heath Road, Sandbach (APP/R0660/A/14/2212992), where Inspector Richards (in allowing the appeal in August 2014) stated in paragraph 47 that:

“The Appellant also suggests that the Council’s lead in times are overoptimistic. The lead in times relied on in the position statement have been reduced significantly in comparison with the 2013 SHLAA, which itself had already reduced the lead in times used in the 2012 SHLAA (base date 31 March 2011), the most recent occasion on which lead in times were validated by consultation and agreement with stakeholders making up the Housing Market Partnership. The Appellant gave numerous examples of sites where lead in times on larger sites had exceeded the Position Statement’s assumptions on lead in times. I acknowledge that in the current house building revival, developers are likely to be keen to proceed expeditiously where permission has been granted. I also acknowledge that the Council has taken steps to expedite matters such as negotiations on S106 agreements. Nevertheless until such time as revised build out rates are consulted upon and perhaps agreed, I consider that it is preferable to use the lead-in times from the SHLAA 2013, which gives a more realistic figure for lead in times for sites over 200 dwellings, of 3.5 years.”

To illustrate this point, below is an extract from the 2013 SHLAA table referred to above, which sets out likely lead in times for housing developments of various sizes.

		Build rates			Notes
Site Status		Site Size / Number of Dwellings			
		Less than 50 homes	50 to 200 homes	200 plus homes	
Under construction	Lead in time	N/A	N/A	N/A	Build rate applied to residual capacity
	Build rate (per annum)	15 dwgs	30 dwgs	50 dwgs	
Full Planning Permission / Reserved Matters	Lead in time	1 year	1.5 year	2 year	Lead in time to allow for infrastructure provision and construction start up.
	Build rate (per annum)	15 dwgs	30 dwgs	50 dwgs	
Outline Planning Permission	Lead in time	1.5 years	2 years	2.5 years	Lead in time to allow for full permission / reserved matters, infrastructure provision and construction start up.
	Build rate (per annum)	15 dwgs	30 dwgs	50 dwgs	
Sites without permission	Lead in time	2.5 years	3 years	3.5 years	Lead in time to allow for planning permission, infrastructure provision and construction start up.
	Build rate (per annum)	15 dwgs	30 dwgs	50 dwgs	

Source: Cheshire East Strategic Housing Land Availability Assessment, February 2013

Accordingly, delivery of completed dwellings on the strategic sites in just over a year from now appears very optimistic. Whilst the above table relates to a different geographical area it highlights the issues that need to be considered, particularly given its recent acceptance at appeal.

If the above approach is applied to Herefordshire Council's delivery rates it is self evident that the Council's housing land supply would continue to be significantly below 5 years on adoption of the Plan.

Making Up Current Housing Shortfall

As set out in paragraph 9.2 of the Council's March 2015 report *"The Council's preferred approach is to make up any shortfall over the whole Plan period."*

For the reasons set out below, we consider that the shortfall should be met within the next 5 years of plan making, not over the whole plan period.

As required by Paragraph 3-035-20140306 of the Planning Practice Guidance (PPG), Council's should aim to meet any shortfall within the next 5 years of plan making.

In line with Paragraph 47 of the NPPF, the Council should be seeking to significantly boost the supply of housing, rather than suppress the need and shortfall until a later time in the plan period.

We note that that the recent Inspector's 'Interim Views on the Legal Compliance and Soundness of the Submitted Local Plan Strategy', (Cheshire East Council – Examination of the Cheshire East local Plan Strategy) dated 6 November 2014, advocates the 'Sedgefield' approach at paragraph 58:

"In terms of past provision of housing, there are two concerns, firstly, the shortfall in provision in the early years of the current plan period (2010-2014), and secondly, provision in the years before the current plan period began. To address the first concern, CEC proposes to spread this under-supply (over 2,500 dwellings) over the rest of the plan period (2014-2030) (the 'Liverpool' approach), although the plan could accommodate this under-supply within the next 5-years of the plan period (the 'Sedgefield' approach). Since the latter approach is recommended in the PPG and is usually adopted in appeal cases, I can see few arguments against using this approach in the LPS. In the context of recent under-provision of housing, there is clearly a case to meet these shortfall as soon as practicable. Although it would increase housing provision in the early years of the plan period it would reflect the guidance in national policy to significantly boost the level of housing provision. Comparisons with other local plans which have adopted on the 'Liverpool' approach may not have fully acknowledged the particular circumstances and housing markets in these cases."

It is therefore considered that the 'Sedgefield' approach should be adopted by Herefordshire Council.



I trust this is of help. If you have any queries, please do not hesitate to contact me.

Yours sincerely



Louise Steele

(signed in absence to avoid delay)