

Update of Herefordshire Local Plan – Core Strategy EIP, Five year housing land supply (2015-2020)

Dear Madam,

Reference paragraph 4.2 of the above document. I said at the Examination that based upon the projections of population and household numbers (and before other factors like economic development were considered) there was no case for the Core Strategy to provide for more than the minimum 16500 homes. This exceeds to OAN range of 15400-16200 calculated by GL Hearn in September 2014. I submit that the argument for requiring more than 16500 is even weaker now given 2012 population based and household projections (2012/2037) released on Friday 27 Feb. These show both population and household numbers lower than those used in the current OAN calculation. I request that the OAN calculation is updated.

Clearly this range is crucial in deciding if the 16500 figure repeated throughout the 5 year housing land supply document is a proper basis for the housing land supply as calculated in *Figures 10a-10d*. While it is important that the numbers add up and, of course meet legislative requirement; I maintain that it is crucial that you have confidence in the land supply figures and that delivery is guaranteed.

Although the minimum number of homes to be provided under the Core Strategy and therefore the calculated 5 year housing land supply now look generous and there is a case for reducing it; the prime weakness in the land supply calculations is not the overall number. It is increasingly clear that the allocations to Hereford (6500), Market Towns (4700) and Rural Areas (5300) are unsound and so are the trajectories proposed. This is because the land supply is not guaranteed due to the risks to various elements in the calculations including windfalls and neighbourhood development plans.

FIVE YEAR LAND SUPPLY – UNCERTAINTY OVER LOCAL NUMBERS AND NEIGHBOURHOOD DEVELOPMENT PLANS

Figure 1 in the above document and the figures upon which it is based (Appendix 3) remain incorrect. I referred to this in my supplementary representation on the Rural Area policies (my pp4). They carry forward the mistakes from Appendix 5 of the AMR 2014 (**P56**) by including – for example - approvals in parishes outside the Hereford boundary within the city totals when they should be included as part of the total for rural areas.

The numbers are individually small in relation to overall 5 year housing land supply, 16500 minimum homes and trajectories but demonstrate a remarkable lack of clarity for residents, developers, planning officers and those working on neighbour development plans. These mistakes show poor record keeping, raises doubts over any monitoring and delivery arrangements and continue the uncertainty over boundaries. A five year housing land supply is of no use if land is not available in the right place.

Paragraph 1.1 of the above document refers to annual updates to the supply of specific deliverable sites and *paragraph 9.6 refers* specifically to the Hereford Area Plan identifying further housing land. As was made clear at the Examination; there is a sizeable zone of uncertainty around Hereford because of the potential for mis-allocating permissions / future sites between Hereford City and the Hereford Rural housing market areas and the fact that the Hereford Area Plan is a neighbourhood

development plan. This does not have authority outside the city boundary yet will cover areas – still undefined – outside the city boundary. Uncertainty will continue unless boundaries are provided and the ‘chain of conformity’ between local development scheme plans is clear. The problem of providing the ‘right houses at the right time and in the right place’ will not be resolved until these are done. The fringes of the market towns may be similarly affected by porous boundaries between urban and rural areas and the resultant lack of security in housing delivery.

The Core Strategy persists in being unclear about what is intended as well as the mechanism for making changes over time. These mechanisms appear to me to be; reworded strategic policies (which are not yet available) and/or decisions by planning officers (as part of an annual update?) / the planning committee / on appeal that result in a particular site(s) suddenly becoming developed.

Paragraph 7.1 (bullet point 8) and paragraphs 7.49 onwards of the above document refer to neighbourhood development plans. The incorrectly allocated numbers referred to earlier in in *Appendix 3* could be equal to the indicative target for a ‘village’ referred to in Policy RA1/RA2. If these are suddenly removed and counted elsewhere, how can that village remain in conformity with the Core Strategy? No-one engaged in neighbourhood development plans wishes to suddenly find the housing numbers upon which they have been working have changed. This is of crucial importance to qualifying bodies that need this clarity.

For neighbourhood development plans, clarity begins with the position of post 2011 approvals. Are Herefordshire Council going to count these against the RA1/RA2 indicative targets to 2031 as local councils have been repeatedly advised? Where in the 5 year housing land supply calculations do they appear because they are clearly not included in *Figure 7 of the above document*.

It is clear that each housing market area has a % target and Policy RA1 says that individual villages may fall above or below that. Paragraph 4.8.13 of the Core Strategy makes it clear that this ‘target is not the sole measure of conformity but there needs to be a rationale for any difference’. This raises the prospect of the ‘last one(s) out of the gate’ having to meet any potential HMA-wide under provision or targets being changed across the HMA or Herefordshire Council somehow requiring neighbourhood development plans to identify sites up to a certain capacity if that is legal. Such approaches would produce a housing number that meets whatever planning total is required but this number would bear no relation to land supply locally, infrastructure capacity, local wishes, sensible planning or the market’s own plans. We have to be sure that we are hitting the right target locally and these 5 year housing land supply calculations on their own do not convince that sufficient land will be available in the right places.

Contrary to Herefordshire Council’s claims it is not the delay in adopting a Core Strategy that may cause delays. The basic spatial strategy is clear; focus on Hereford irrespective of the infrastructure required and allocate housing to all rural areas. But, even when adopted the Core Strategy will still leave too many uncertainties and qualifying bodies cannot live with this. All are happy to monitor and, if necessary, amend their plans but local capacity and financial resources are limited and so cannot easily respond to sudden changes in the ‘rules’. *Contrary to paragraphs 9.6 and 9.7* in the document above, neighbourhood development plans will come forward regardless of early adoption or not, of the Core Strategy otherwise the evidence base may not be sufficiently recent or retain its

currency. It is too simple to say that an approved Core Strategy will resolve everything. What is required is detail like how the local land supply calculations relate to the targets in RA1 & RA2 in particular.

FIVE YEAR LAND SUPPLY AND THE STRATEGIC URBAN EXTENSIONS

Table 8 in the document above refers to a number of homes to be delivered from these urban extensions which are also referred to in other places. It is still unclear how funding for the necessary infrastructure will be secured if development proceeds before the Core Strategy is adopted? (which it is), in the absence of a CIL etc.

Paragraph 7.18 covers Homer proceeding in advance of infrastructure and sustainable transport measures. What does this mean for funding eventually? is this sustainable development? and how much weight should be attached to Policy SS3 saying that development will only proceed with the necessary infrastructure? The housing numbers, and therefore the land supply assumed, are at risk because of this uncertainty. *Paragraph 7.21* makes similar points about 3 Elms and *paragraph 7.27* on Lower Bullingham. The surrounding rural areas (potentially part of the Hereford Area Plan) rely on this infrastructure too which has to provide capacity for areas outside the sites themselves. The decoupling of development from infrastructure and funding seems to me to cause questions about the viability of development sites and their contribution to housing land supply in total and overtime.

RURAL AREAS HOUSING LAND SUPPLY

Figure 1 of the above document refers to this. No adequate explanation is given for the peaks in the trajectory between 2016/2021 and 2026/2031.

Turning to the detail; if you take every settlement in Core Strategy Figures 4.20 and 4.21 and use Herefordshire Council's growth numbers, it is possible to assess the sewerage connectivity of each by reference to the water cycle study reports (**PS59 etc**) and the DWR Welsh Water / Herefordshire Council statement of common ground. Of the 5300 rural allocation, approximately 2900 (>50%) will be off mains sewerage. (Corroboration of this approximation comes from Water Cycle Study Addendum (**PS57**) which states that 2200 are connectable (5300-2200 = 3100 – i.e. close enough to 2900). Furthermore only 20% of the total 5300 rural houses appear to be in areas with mains sewerage headroom. In addition approximately 500 homes in main growth villages (Figure 4.20) are outside mains sewerage as are approximately 2400 of the Figure 4.21 villages. This is not sustainable development without the necessary infrastructure provided by secured funding and may discharge as much as 1million litres of waste water per day into the Rivers Wye and Lugg from septic tanks or package treatment plants.

Despite Herefordshire Council's words in *paragraph 5.9* the statement of common ground between DWR Welsh Water and Herefordshire Council says in Para 1.30 'such development may need to be phased to latter part of CS period in certain villages while para 1.31 says 'may not be possible to increase smaller works' so more waste will be discharged to package treatment works or to septic tanks. It is particularly perverse therefore for the Core Strategy to say in paragraph 4.8.14 that 'neighbourhood development plans will particularly need to consider capacity of the drainage networkimpact on water quality' when the overall allocation has been decided without adequate reference to these infrastructure constraints. These proposed houses should not be included in the five year land supply total nor the rural area housing number

WINDFALLS AND NEIGHBOURHOOD DEVELOPMENT PLAN ALLOCATIONS

Paragraph 5.1 talks about housing market improvement and this is covered in more detail in *paragraphs 5.5* onwards. The most recent surge in planning permissions that Herefordshire Council identify (*Paragraph 7.8* – surely the title is wrong and it should refer to September 2014?) appears to be largely driven by the lack of a 5 year housing land supply and are primarily in, or close to, villages, particularly those within easy commuting distance of Hereford. This phenomenon is continuing

There is no allowance for these after September 2014 while the windfall numbers (*Paragraph 7.45*) are very conservative. A predictable result is that rural housing builds will consistently overshoot the assumptions about what will be brought forward by NDP's and so at each annual review, the 5 year housing land supply will increase. One possible solution to this 'creep' would be to reduce the 5300 rural allocation to reflect the number of rural houses without sewers so that the allocation is based on what can actually discharge into a sewer. Even this begs the questions of whether the sewer actually has any spare capacity and if its discharges may or may not pollute the Wye and Lugg SAC.

OTHER POINTS

While the inclusion of the Whitecross school brownfield site (*Figure 8*) is welcomed, there are other large sites within Hereford city – not least the Racecourse – which are not included

CONCLUSION

Herefordshire Council is pushing for a fast conclusion to the Core Strategy process. I do not believe this is possible given the level of uncertainty over the five year housing land supply and the consequent risk to housing delivery. The immediacy Herefordshire are seeking is only acceptable if there was greater clarity coupled with assurance on delivery and implementation. There is not sufficient robust thinking behind these 5 year calculations even though the figures themselves actually add up.

One possible improvement to the security of land supply would be to reduce the Hereford total and exclude some rural areas if no 'villages' or prospect of the necessary infrastructure existed. This would effectively re-introduce the concept of 'open countryside' in part of the county which could be qualified by the proposed rural exception site policy and a properly thought through approach to neighbourhood development plan sites to sustain local communities.