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10 March 2015

Dear Ms Thorby

**Re: Herefordshire Council Core Strategy Examination**

I would comment on the up-date document as follows:-

**4.4** – In Figure 1 Pre-Submission Core Strategy indicative housing trajectory by settlement, if you look at the figures as percentages it shows an odd distribution of homes across the county – see attached Appendix 1 – which appears to be a random exercise rather than a methodical approach.

**7.18** – The policy HD4 for Holmer West states “*The expansion area ..... is also dependent on ..... the construction of future phases of a Hereford Relief Road*”. None of the northern phases of the Relief Road are planned within the 5 year supply period, therefore these 225 dwellings cannot be deliverable.

**7.25** – The policy HD6 for Lower Bullingham states “*This location ..... is also dependent on ... .. the construction of future phases of the Hereford Relief Road*”. Strategic policy SC2 has not yet been approved so therefore 350 dwellings cannot be deliverable.

**7.52** – Relating to windfall sites, most rural villages have little or no spare infill sites as they have all been built on resulting in developers rushing to develop greenfield sites making Neighbourhood Development Plans irrelevant as there is no cap. This is contrary to what members of the public have been led to believe through the NDP process. We are already seeing a glut of planning applications springing up all over the county on good quality agricultural land. This will result in the rural target figure of 5,300 overshooting. Therefore, the 5,300 figure should be reduced to allow for

(a) the non-NDP overshoot in the first five years and

(b) the fact that over half of the 5,300 homes will be in locations where sewerage connections are not possible with many of these within the Lugg sub-catchment area which is already breaching its phosphates limits.

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**8.2** - Figure 10a shows that with an indicative trajectory target and the shortfall being addressed over the forthcoming five years there would be a five year supply of housing land in the County. Relating to HD4, if you take out Holmer West 225 and Lower Bullingham 350, then the 5 year supply becomes 5.48 years. If however Holmer West 225 is taken out, the 5 year supply becomes 5.82 years.

**8.4** - Figure 10c - Assessment against annualised Core Strategy target. If you take out Holmer West 225 and Lower Bullingham 350, this 5 year supply becomes 4.09 years. Take out Holmer West 225, the 5 year supply becomes 4.34 years.

**8.5** - Figure 10d - Assessment against annualised Core Strategy target. Take out Holmer West 225 and Lower Bullingham 350, then the 5 year supply becomes 5.10 years. Take out Holmer West 225, then the 5 year supply becomes 5.41 years.

**9.6 Housing land supply for Herefordshire** - With reference to the Hereford Area Plan, without knowing exactly where further development of housing land is going to go, how can this be referred to when it has not yet been prepared and publicised?

**To Conclude** – The confidence of local communities has already been undermined because considerable time and effort has been spent in bringing forward draft Neighbourhood Development Plans at the same time as developers are putting in applications which are additional to those identified in these NDP's, usually on non-NDP sites. We are all aware of the urgency for a sound Core Strategy but we are where we are as a result of the failure to manage the County's strategic planning properly in recent past years. The driving force behind the Core Strategy housing numbers seems to be the need to part-fund the Relief Road from the Community Infrastructure Levy rather than on need.

Also, the Rural Housing numbers have been over-cooked to spread development across Herefordshire with disregard for lack of infrastructure (sewerage, roads, education) and the environment.

Since compiling this representation, the Office of National Statistics has published the growth figures for 2031. Based on the information therein, I would make the following comments which have a bearing on the Core Strategy housing figures and five year land supply:

**Herefordshire Population:**

|                     | 2011 Population | 2031 Population | Popn growth | Growth % |
|---------------------|-----------------|-----------------|-------------|----------|
| Hearn report for CS | 183,245         | 205,695         | 22,450      | 12.3%    |
| ONS Feb 2015        | 180,726         | 199,156         | 18,430      | 10.2%    |

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The ONS Feb 2015 figures are for Household population. It is a possibility that the Hearn March 2012 Report on which the Core Strategy was based included the institutional/communal population (which was about 2,900 in the 2011 Census) in the population figures. There is an approximate 3,000 + difference for 2011. Is this an error?. A higher population does, obviously, boost any resulting calculation for dwellings as indicated in the Core Strategy.

Thank you for taking the time to read my representation and I await the outcome of your findings in due course.

Yours sincerely



**CLLR S J ROBERTSON  
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ENC. APPENDIX 1

- 4.4 This report therefore provides an assessment of the housing land supply against the Core Strategy targets. Policies SS2 and SS3 of the Core Strategy set out the Council's strategy to secure the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031. In respect of a housing target for Herefordshire the expectation is that the highest rate of housing completions will be towards the latter end of the plan period (see Figure 1 below).

**Figure 1 – Pre-submission Core Strategy indicative housing trajectory by settlement**

|                      | 2011-16    | 2016-21    | 2021-26    | 2026-31    | Total        |
|----------------------|------------|------------|------------|------------|--------------|
| <b>Hereford</b>      | 1000 15.4% | 1500 23.1% | 2000 30.8% | 2000 30.8% | 6500 100.0%  |
| <b>Leominster</b>    | 300 13.0%  | 500 21.7%  | 700 30.4%  | 800 34.8%  | 2300 100.0%  |
| <b>Ross-on-Wye</b>   | 250 27.8%  | 275 30.6%  | 175 19.4%  | 200 22.2%  | 900 100.0%   |
| <b>Ledbury</b>       | 180 22.5%  | 350 43.8%  | 210 26.3%  | 60 7.5%    | 800 100.0%   |
| <b>Bromyard</b>      | 120 24.0%  | 125 25.0%  | 125 25.0%  | 130 26.0%  | 500 100.0%   |
| <b>Kington</b>       | 30 15.0%   | 40 20.0%   | 60 30.0%   | 70 35.0%   | 200 100.0%   |
| <b>Rural Areas</b>   | 1120 21.1% | 1460 27.5% | 1230 23.2% | 1490 28.1% | 5300 100.0%  |
| <b>Herefordshire</b> | 3000 18.2% | 4250 25.8% | 4500 27.3% | 4750 28.8% | 16500 100.0% |

- 4.5 This indicative trajectory was included within the pre-submission Core Strategy (figure 3.5). The Inspector has suggested that this table should be replaced with a more detailed year by year trajectory related to policy SS3 and to be set out as an appendix to the Core Strategy. It will be included as a part of the forthcoming main modifications consultation.

## 5. Justification for the Council's approach to the housing trajectory

- 5.1 The Core Strategy indicative trajectory suggests that in the early years of the plan anticipated delivery rates will be lower than would otherwise be the case through an annualised trajectory. These rates will increase through the Plan as the housing market improves and key infrastructure is provided.
- 5.2 At the Hearing session dealing with Matter 2 the Inspector requested that the Council gave further consideration to the Indicative trajectory and provided additional justification for "backloading" the housing provision.
- 5.3 The Council's Matter statement upon Policy SS3 (Document ref 2.2) made clear that the indicative housing trajectory of the Core Strategy on page 35 does not seek to constrain the annual delivery precisely to these figures. The proposed modifications to policy SS3 following discussions at the EIP Hearing Session will make this clear. The Council recognise that ideally housing delivery should be delivered as quickly as possible providing that necessary infrastructure can also be provided in a timely manner to facilitate sustainable development. However, to achieve an immediate and significant increase in housing delivery is not realistic and the indicative trajectory is the most appropriate, practical and deliverable approach to achieving the Plan target of 16,500 by 2031. The main reasons for this approach are set out below.