

5 Year Housing Land Supply Examination Revision February 2015 Consultation

Representor 283/Mrs E Morawiecka

The NPPG outlines that the latest population projections should be considered in determining levels of future housing growth. The latest population projections are the 2012-2037 Household Projections published by the ONS on 27 February 2015, and are the most up-to-date estimate of future household growth.

The NPPF (Paragraph: 030 Reference ID: 3-030-20140306) recognises that *“It should be borne in mind that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.”*

The revised 5 Year Housing Land Supply (5YHLS) Feb 2015 Examination Revision does not seem to have taken account of the most up to date population projections dated 27th Feb 2015. The ONS projections indicate that the population and housing growth should be lower than that proposed by Herefordshire Council.

On 15th October 2014 Herefordshire Council published a press release *“Following recent changes to the way affordable housing is allocated, the number of people registered to be rehoused across the county has reduced dramatically from over 5,000 to below 1,000.”* This would seem to reflect that housing need is lower than that previously forecast in the 2014 Core Strategy, but this does not seem to have been taken into account in the housing growth figures included in the Feb 2015 Examination Revision.

Whilst Herefordshire Council have not used the new ONS population figures, the GL Hearn report August 2014 determined an Objectively Assessed Need between 15,400 and 16,200 homes in Herefordshire over the 2011-31 plan period. Herefordshire Council state (para 4.3) *“The Herefordshire Core Strategy covers the period 2011-31 and provides for a minimum 16,500 homes. This target exceeds the objectively assessed need identified for between 15,400-16,200 homes over this period by 2% - 7% (300-1,100 homes)”*. In view of the latest ONS population projections the OAN should be scaled back further and the minimum of 16,500 homes should not be used as a base for the 5YHLS calculation. I have previously commented that Herefordshire Council should be using the lower figure of 15,400 as a minimum level of housing delivery over the plan period, if not a much lower figure which recognises the considerable constraints on housing development in Herefordshire, in particular in respect of the ability to handle the growth in waste water capacity from new housing and the loss to the nation of high grade agricultural land.

Para 5.9 states *“The proposed timing and scale of housing proposed is deliverable over the full plan period”* but the evidence to support this statement is not currently available. I do not feel that evidence provided at the EIP shows that infrastructure to support the plan will be available, in particular the needs of the NMP when the IDP labelled the costs for water and sewerage treatment in Appendix 1 as “n/k”. With the CIL schedule disconnected there is also no clear funding from developers to support the delivery of the required infrastructure to support the level of housing growth proposed.

Representor 283/Mrs E Morawiecka

It is good to see in Section 7 that the basis of the calculations has been revised to include elements of housing delivery previously omitted from the Council's earlier 5YHLS and that the revised calculations show that Herefordshire does have a 5 YHLS. I hope that the existence of the 5YHLS is now being communicated to the Planning Committee and to developers.

The shortfall shown at para 7.54 in the early years of the plan is because Herefordshire Council has chosen to use the higher levels of housing growth and has not considered the OAN proposals of GL Hearn August 2014 or the latest ONS figures published February 2015 . I therefore do not agree with the shortfall calculations as again the base housing growth figures are too high, not sustainable and not deliverable.

I still contest that the shortfall should be based against the lower growth target per GL Hearn of 15,400, if not a much lower figure as per my submission June 2014. If the phasing of the housing delivery plan is back loaded to take account of the later pick up in the housing market beyond that currently experienced, this means that the 1,100 units taken off the target should be recognised as not having been delivered in the first 3 years of the plan (this would also mean that forecast delivery more closely resembles actual housing delivery experienced.).

	2011-16	2016-21	2021-26	2026-31	Average p.a
Emerging Core Strategy	600 p.a.	850 p.a.	900 p.a.	950 p.a.	825 p.a.
Total	3,000	4,250	4,500	4,750	16,500
Revised Housing target	380 p.a.	850 p.a.	900 p.a.	950 p.a.	770 p.a.
Total	1,900	4,250	4,500	4,750	15,400

At para 9.6 *"The Council submits that the speediest approach to increasing housing land in Herefordshire would be by the early adoption of the Core Strategy"*. There is no evidence to support this statement nor any evidence to justify why Herefordshire Council should want to increase housing land in Herefordshire when it acknowledges elsewhere within the Core Strategy that this would:-

1. Lead to the loss of the highest grades of agricultural land around Hereford ahead of brownfield sites and land of lower agricultural grade. On 16th Feb 2015 it was reported at a conference on climate change and agricultural production in San Jose by Jerry Hatfield, director at the National Laboratory for Agriculture and the Environment that "If you look at production from 2000 to 2050, we basically have to produce the same amount of food as we produced in the last 500 years" he said "But globally, land usage levels and productivity will continue to degrade the soil", he added. At a national level there is no reason why housing land leading to the loss

Representor 283/Mrs E Morawiecka

of high grade agricultural land should be accelerated, especially in an area which has of the highest grades of agricultural land should happen in an area where there is already lower than average unemployment levels, inadequate infrastructure and growth plans risk damaging a European SAC.

2. There is still no evidence that the proposed levels of housing growth can be accommodated in Herefordshire without further impacting on the water quality of the River Wye SAC and that such development would be sustainable, minimising CO2 emissions. This is shown by the situation on the Cagebrook by Clehonger where Welsh Water Representation 3rd July 2014 https://www.herefordshire.gov.uk/media/1130659/291_Welsh_Water.pdf Page 5 for Clehonger: "*The likely level of development would overload our Clehonger WwTW and therefore foul flows could not be accommodated without additional upgrading of this asset.*" Yet the Water Cycle Study Addendum Feb 2015 (https://www.herefordshire.gov.uk/media/7963602/water_cycle_study_addendumv2.pdf Assessment of Sewage Treatment Works in Hereford to consider Impact of Growth on Permits page4 of 18) shows Clehonger STW (or Cagebrook) in the green and states "*Based on growth information provided to DCWW, no scheme was planned for AMP6. However, some recent planning applications for larger sites. Review need for AMP7 (2020- 2025) scheme at PR19*". This shows that evidence on the Water Cycle Study is apparently inconsistent and does not reflect the actual situation currently experienced "on the ground" regarding waste water capacity.
3. The Core Strategy population growth requires significant infrastructure to come forward ahead of the housing delivery but significant funding is necessary to fund this infrastructure. Without a robust CIL in place then a considerable amount of the funding necessary to deliver this infrastructure will not come forward from developers. Therefore it is imperative that adoption of the CIL should be brought forward in parallel with the Core Strategy. Also, all infrastructure required by the NMP needs to be clearly costed, along with the infrastructure required to support growth in the rural areas, another "n/k" in the IDP.

It is unclear why Herefordshire Council at para 9.7 claim that delay in adoption of the Core Strategy "*would also lead delay in the adoption of Neighbourhood Development Plans and potentially undermine the confidence of local communities in that process*". This would appear to be contrary to the advice contained in the NPPG Paragraph: 009 Reference ID: 41-009-20140306 06.03.2014 "*They (NDPs) can be developed before or at the same time as the local planning authority is producing its Local Plan...A draft Neighbourhood Plan or Order is not tested against the policies in an emerging Local Plan although the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.*"

As long as NDPs are in conformity with the NPPF and in general conformity with the emerging policies of the Core Strategy (except where the Core Strategy fails to comply with the NPPF, is economically not viable or is not sustainable) then there is no reason why Neighbourhood

5 Year Housing Land Supply Examination Revision February 2015 Consultation

Representor 283/Mrs E Morawiecka

Development Plans are not able to come forward ahead of the Core Strategy. Furthermore, now that Herefordshire Council has finally confirmed that it does have a 5YHLS it makes it easier for NDPs to bring forward development on sites that have been identified as sustainable and acceptable to local communities.