

## HEREFORDSHIRE LOCAL PLAN CORE STRATEGY EXAMINATION

### FURTHER COMMENT ON NEW EVIDENCE ON 5 YHLS

After further consideration of the Council's new evidence on the 5YHLS it is agreed that :-

- any trajectory is for indicative purposes only and it is not a constraint on development ;
- the buffer is 20% which should be applied to the housing requirement and the shortfall as stated by the Inspector ;
- care homes should be removed from the land supply.

The Council's 5 YHLS calculation is worked on the presumption of a housing requirement of 16,500 dwellings over the plan period based on the Council's objectively assessed housing needs (OAHN). The OAHN was robustly challenged during the Examination Hearing Sessions and the Council was asked to undertake further work after publication of DCLG 2012-based household projections. This further work is awaited and on which the HBF and other parties are yet to comment. Any changes to OAHN and as a consequence the housing requirement figure will necessitate a re-calculation of the 5 YHLS.

The Council' preferred approach as set out in Figure 10b is not appropriate. The approach of applying a back-loaded trajectory combined with the Liverpool method of spreading shortfall over the remaining plan period is a "double whammy" to "*significantly boosting housing supply*" as required by Paragraph 47 of the NPPF.

The Sedgefield method of dealing with shortfalls within 5 years is the preferred approach as set out in NPPG (ID 3-035-20140306). Therefore the only choice for a preferred approach to 5 YHLS is between Figure 10a (trajectory/Sedgefield) and Figure 10c (annualised requirement/Sedgefield). It is HBF opinion that Figure 10c is preferable to Figure 10a.

After reviewing the Gravesham Inspector's Report referred to by the Council it is difficult to agree that the circumstances in Gravesham are the same as those in Herefordshire. Therefore it is disputed whether or not the Inspector's comments have any relevance to the debate concerning housing delivery in Herefordshire.

As stated above Figure 10c should be the preferred approach however if convinced by the Council's arguments Figure 10a (trajectory/Sedgefield) should be chosen rather than Figure 10b (trajectory/Liverpool).

As set out by the Council Figure 10c shows only 4.51 YHLS whilst Figure 10a shows 5.25 YHLS. It is noted that the Council is no longer applying a 10% non-implementation allowance. However given that a large proportion of housing land supply is from sites with only resolutions to grant planning consent, strategic sites without planning consents, windfall sites and as yet un-adopted Neighbourhood Plan allocations it would be prudent to include an implementation gap allowance in case actual housing delivery from such sites is slower than anticipated.

Already Figure 10c is below 5 YHLS if an implementation gap percentage was applied Figure 10a would also fall below 5 YHLS. Therefore if there is not reasonable certainty that the Council has a 5 YHLS the Local Plan cannot be sound as it would be neither effective nor consistent with national policy as set out in Paragraph 47 of the NPPF. Moreover if the Local Plan is not to be out of date on adoption it is critical that the land supply requirement is achieved as under Paragraph 49 of the NPPF *“relevant policies for the supply of housing will not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites”*.

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