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Dear Madam,

Update of Herefordshire Local Plan - Core Strategy Examination in Public Five Year Housing Land Supply (2015-2020)

Asbri Planning is acting as agent on behalf of Taylor Wimpey Strategic Land, and previously submitted representations on the Submission version of the Core Strategy which questioned the dwelling figures quoted in Policies SS2 (Delivering New Homes) and SS3 (Releasing Land for Residential Development), particularly in the context of the sites identified in Hereford.

These representations emphasised that there is a need for the early release of sites which can be developed in the shorter term, and pointed to the low levels of recent completions which have not been meeting required targets.

As part of the hearings held on Day 1 (10 February 2015) around Matter 2 (Policy SS3) the Inspector asked the Council to produce a refreshed analysis on 5 year housing land supply issues.

We therefore wish to comment briefly on the Council's response dated 2nd March. Time has not allowed us to consider a detailed analysis of the sites included in Appendices 3 to 5. We concentrate therefore on the projected annual build rates on the Strategic Urban Extensions, with particular reference to the Hereford Western Expansion, Three Elms, where Taylor Wimpey are promoting a planning application for approximately 75 dwellings on part of the proposed development area (land north of Kingsacre Road, and west of Huntingdon Lane).

In Paragraph 7.19 we would suggest a change of wording to the last sentence where it should be stated that 'A smaller area of land **in** the south of the expansion area is covered by an option to Taylor Wimpey'. Otherwise it is implied that the land at Huntingdon Lane falls outside the strategic release.

In Paragraphs 7.21 and 7.22, whilst we welcome comments which confirm that the selection of the preferred route for the Hereford Relief Road (programmed for the end of 2016) may not preclude development on parts of the site in advance, we would seek further clarification regarding those parts of the strategic release where such development would be permissible, rather than broadly stating '*eastern parts of the expansion area*'.

The Study of Options for the Hereford Relief Road, published in September 2012 reviewed possible corridor options. This emphasised that the study corridors were identified for the purposes of the plan making process and not the precise routes, with definitive routes to be included in the Hereford Area Plan. However, at this location an easterly route option did not extend so as to encroach on the site in question. In preparing a site layout plan allowance has been made for a corridor to the west of the site to allow for such a route option. It is

noted that the corridor identified by the Church Commissioners for England in an Illustrative Masterplan prepared on their behalf, shows the Relief Road running further to the west,

Nevertheless in a pre-application meeting held on 26th January 2015, Herefordshire County Council Officers stated that a planning application for the Huntingdon Lane site in advance of the confirmation of the road corridor would be objected to on prematurity grounds.

Paragraph 7.19 of the Council's Update refers to detailed pre-application on the wider proposals for the Church Commissioners land. However, in view of the Council's stance that they do not wish for planning applications to pre-determine the route of the Relief Road, the Church Commissioners proposals are also likely to be deemed as premature.

It must also be emphasised that if a route corridor were identified which projected further east than the eastern option shown in the 2012 Study of Options, it would significantly reduce the developable area of the Three Elms site.

We therefore consider that unless the Council relaxes its position on determining planning applications in advance of the route of the Western Relief Road being identified, the 100 dwellings, attributable to the Three Elms strategic release will not be delivered in 2016/17.

With regard to the delivery of housing numbers suggested on the other strategic sites in Hereford, we have major reservations, particularly with regard to the Holmer West and Lower Bullingham sites, which are both controlled by a single developer, Bloor Homes.

Whilst we do not dispute that starts could be made in 2016/17 on both sites, we would question whether a total of 160 dwellings per year in Hereford could be delivered by a single house builder, even assuming a much improved market in the years 2017/18 to 2019/20. We maintain that a total number of dwellings achievable in combination on both sites by a single developer is not likely to exceed 75 dwellings per annum.

We therefore suggest that annual completions on Lower Bullingham be reduced to 50 dwellings, and those on Holmer West be reduced to 25 dwellings. Allied to our comments above on Three Elms, given the Council's current stance, we consider that the total 5 year contribution from the Hereford Strategic Sites should be reduced from 2,265 as proposed, to 1,890.

This would in turn reduce the number of units in the 5 year supply overall, to 5,826. When assessed against the emerging Core Strategy Target (10a) which involves the shortfall being addressed in in the first 5 years, this would give a 4.92 year supply rather than 5.24 years.

The Council's preferred approach however, is to make up the shortfall over the whole Plan period, and under this option, 10b – 5.67 years would result from our reduced calculations rather than the Council figure of 6.04 years. This reflects a 'backloaded' approach whereby the Council consider that the frontloading of housing delivery is not practical at the current time. However we consider that this method disguises a consistent lack of supply over recent years which needs to be addressed in the shorter, rather than longer, term.

We nevertheless maintain that unless suitable measures are incorporated in a revised Core Strategy, either by the Council applying more flexibility in respect of the western route corridor, or by consideration of further shorter term releases, an adequate 5 year housing supply will not be achieved.

I would be grateful therefore if you pass these comments on to the Inspector and Herefordshire Council Officers.

Yours sincerely,



Keith Warren
Associate Director