

**From:** William Bloxsome

**Sent:** 15 February 2023 10:43

**To:**

**Cc:** Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; Phillip Howells <phowells@ledburytowncouncil.gov.uk>

**Subject:** Ledbury Review Neighbourhood Development Plan

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Dear Ms Beth,

Sam Banks has asked us to reply direct to you upon this question and having conferred with the Chair of the NDP Steering Group, we would advise as follows:

Policy HO2.1 is a saved policy in the current adopted NDP with only a minor change just to clarify that (C3b) at the end of point e) relates to the Use Class. It refers to windfall developments of more than 10 dwellings as was the intention at that time and this remains the case. There are no new allocated sites in the current plan although the draft review NDP retains the committed sites as allocations in the event that they fall out of time before development commences. Those committed sites are all large sites and the mix of housing types would fall to be considered under Core Strategy Housing policies, in particular H1 (Affordable Housing) and H3 (Ensuring a range and mix of housing types). Core Strategy policy H3 seeks a range of housing types within developments although indicates that on sites 50 or more dwellings a range will be expected. Both the adopted NDP and the submission reviewed NDP seek to require such a range for a lower number - more than 10. This is to reflect the community's aspiration for small sites; the fact that there are no larger sites proposed in both versions other than the committed sites; a reduced figure is not excluded within the wording of Core Strategy policy H3; and the provision within the NPPF for affordable housing to be required on sites of more than 10 dwellings, this being one of the provisions within the policy. However, the reference to viability is to acknowledge that smaller windfall sites may have constraints that would affect the ability to meet the lower threshold.

I trust this is the information you require but please let me know if you require any further clarification.

Kind regards

Bill Bloxsome BA (Hons), MRTPI

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**From:** William Bloxsome

**Sent:** 19 February 2023 13:49

**To:** Liz Beth

**Cc:** Banks, Samantha <Samantha.Banks2@herefordshire.gov.uk>; admin@ledburytowncouncil.gov.uk; Phillip Howells <phowells@ledburytowncouncil.gov.uk>

**Subject:** Re: Policy HO2.1

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Hi Liz,

Sorry to be confusing.

I would suggest that given, in effect the NDP seeks the provision of a range of house types on all sites above 10 dwellings, be they allocations or through windfall sites that may come forward, the use of 'Windfall' is unnecessary in policy HO2.1.

I hope this is clearer and apologies again.

Best wishes and stay safe.

Bill

On 19 February 2023 at 11:29 Liz Beth wrote:

Hi Bill,

Just to clarify, are you saying you'd like to keep reference to 'windfall' and add the definition? Or would you prefer to remove mention of windfall?

Please confirm,

Thanks

Liz

Sent from my iPad

On 17 Feb 2023, at 18:28, William Bloxsome wrote:

Might I suggest the latter as it is probably unnecessary within the context of the current reviewed NDP.

Best wishes and stay safe.

Bill

On 17 February 2023 at 16:43 Liz Beth wrote:

Thanks Sam. I wondered the same myself. I have now got a definition of 'Windfall' from Bill that I am proposing to recommend goes into the justification text. I think sites arising would then be clearly covered by Policy HO2.1 or the policy in the Core Strategy – the latter may apply to sites of 50 dwellings or more(?), and so is OK for the larger allocated sites in Ledbury.

If removing the word 'windfall' is not contradicting strategic policy and is acceptable to the LPA, I am happy to recommend this solution as an alternative.

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**From:** Banks, Samantha  
[mailto:[Samantha.Banks2@herefordshire.gov.uk](mailto:Samantha.Banks2@herefordshire.gov.uk)]  
**Sent:** 17 February 2023 15:46  
**To:** 'Liz Beth' <[admin@ledburytowncouncil.gov.uk](mailto:admin@ledburytowncouncil.gov.uk)>  
<[admin@ledburytowncouncil.gov.uk](mailto:admin@ledburytowncouncil.gov.uk)>  
**Cc:** 'William Bloxsome'

**Subject:** RE: Policy HO2.1

Good afternoon All,

Sorry I am slightly late to this conversation due to the draft Local Plan writing deadline this week.

But would the issue be solved by simply removing the term 'windfall' from the policy as all developments over 10 would be expected to provide some form of affordable housing provision. The term windfall in the wording appears to be adding a level of unnecessary confusion.

This policy accords with Policy H1 of the Core Strategy with regards to the threshold of 10 as we are not designated a rural area within the county.

Please let me know if I have misinterpreted the conversation so far.

Thanks

Kind regards

*Sam*

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**From:** Liz Beth  
**Sent:** 12 February 2023 13:46  
**To:** [admin@ledburytowncouncil.gov.uk](mailto:admin@ledburytowncouncil.gov.uk)  
**Cc:** Banks, Samantha  
<[Samantha.Banks2@herefordshire.gov.uk](mailto:Samantha.Banks2@herefordshire.gov.uk)>  
**Subject:** Policy HO2.1

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An issue was raised during the Reg16 consultation that the policy as written only applies to windfall development, and I agree with this assessment. Was this the intention? If so, can you explain the thinking behind it, as the justification only seems to deal with the need, and then acknowledge that viability requires the limit to proposals in excess of 10 housing units only.

Thanks and Best wishes

Liz

Ms L Beth BA (2.1 hons) MA MRTPI Dip Design in the Built Environment