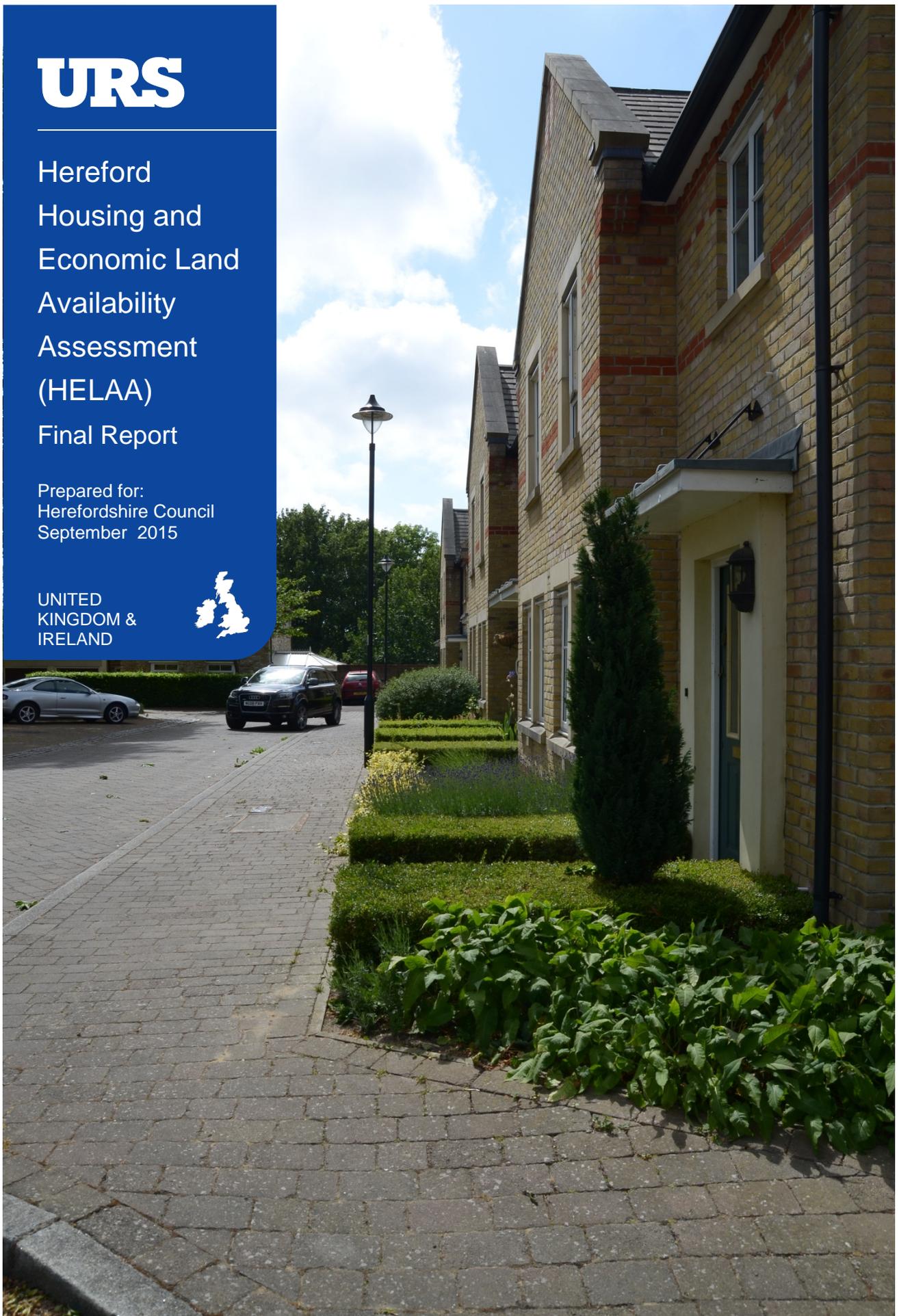




Hereford
Housing and
Economic Land
Availability
Assessment
(HELAA)
Final Report

Prepared for:
Herefordshire Council
September 2015

UNITED
KINGDOM &
IRELAND



REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	September 2014	Draft Report	Una McGaughrin Mahima Vijendra	Una McGaughrin	Una McGaughrin
2	August 2015	Draft Final Report	Una McGaughrin Anthony Whitaker	Una McGaughrin	Una McGaughrin
3	September 2015	Final Report	Una McGaughrin	Una McGaughrin	Una McGaughrin

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1 EXECUTIVE SUMMARY

This report is a housing and economic land availability assessment (HELAA) for the urban area of Hereford and its immediate surroundings and will support the production of the Hereford Area Plan. The Hereford HELAA is one of several evidence base documents that underpin both the Herefordshire Local Plan – Core Strategy, which is in the latter stages of preparation and which, upon adoption, will replace the current adopted Unitary Development Plan (2007) and the forthcoming Hereford Area Plan development plan document. Further information on the Local Plan - Core Strategy, the Hereford Area Plan and supporting evidence base documents can be viewed on the Council's Website at <https://www.herefordshire.gov.uk>

The HELAA is a technical and theoretical assessment of sites which have the potential to contribute towards the supply of land for housing and economic development. It has been undertaken by URS (now AECOM)², working closely with Herefordshire Council.

Local Planning Authorities are required by the Government to prepare a an assessment of housing and economic land availability to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period and should identify sites for housing and economic development over the short term (deliverable within the first 5 years of the plan period), the medium term (6 to 10 years) and the longer term (11 years and over).³

Advice on the methodology used is set out in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) issued by the Department for Communities and Local Government (DCLG) in March 2014.

Sources of sites identified in the HELAA include sites received through a “call for sites” exercise, sites from the previous SHLAA 2012 (a strategic housing sites only assessment), planning applications, sites with planning permission and any other sites identified by the Council. All sites have been assessed consistently using the same criteria irrespective of their current use or development plan status.

In a change to previous SHLAAs and in accordance with the new Planning Practice Guidance (PPG), the HELAA includes a consideration of whether identified sites are suitable and available for economic development as well as housing.

The area of search for the HELAA is confined to the main city of Hereford and land immediately adjoining its boundary.

The criteria used to assess potential sites is set out below¹. To be ‘accepted’ in the HELAA as a site which is deliverable, a site must be:

² In January 2015, URS and AECOM became one company, AECOM. The Housing and Economic Land Availability Assessment was carried out in 2014 as URS.

³ National Planning Policy Framework (March 2012), Paragraphs 47 and 159.

- **Suitable:** A site is suitable for housing development if it offers a suitable location for housing development having regard to planning policy, including the development plan, and its physical limitations and/or potential impacts.
- **Available:** A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This tends to mean that the site is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.
- **Achievable:** A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site.

The approach to the assessment of each site against the criteria above is set out in full in further chapters of this report.

The findings of the Hereford Housing & Economic Land Availability Assessment can be summarised as follows:

- The total number of sites originally considered as part of the HELAA was **291**. A number of these were ruled out at an early stage as they were not within or adjoining the urban area of Hereford. The number of sites assessed as part of the HELAA was **126**⁴. **71** were found to be suitable, available and achievable, in terms of the definitions set out above.
- The total housing capacity from these sites over 15 years is **13,898** dwellings. There are a further 2,359 potential dwellings on sites beyond the 15 year period.
- The total amount of land that may *also* be suitable for economic development or mixed use development is **1,221.3ha**. This figure is not exclusively land available for economic development, it represents land that is potentially suitable for either employment or housing.
- There is evidence that windfall sites have historically formed a significant part of the housing supply in Hereford. An allowance for future windfall provision has been included in the SHLAA. The amount of housing that is expected to be delivered annually through windfall is **50 dwellings**⁵. The theoretical total potential housing capacity for years 0-15 of the Local Development Plan is **13,898** dwellings. Including housing that is expected to come forward as windfall this figure is **14,498**⁶. This document contains a summary of the assessment results, together with the methodology followed. The conclusions will be used inform the identification of sites

⁴ This was after a number of sites were removed as they were outside the urban area of Hereford, or because they were already included with a different site reference.

⁵ Herefordshire Local Plan. Core Strategy 2011-2031 Shaping our Place (Independent Examination Feb 2015) Para 3.50

⁶ To avoid double counting with planning applications, a windfall allowance has not been included for years 1 -3 as this is the period for which planning applications remain valid and therefore likely to be completed within this time. Therefore the windfall allowance is $50 \times 12 = 600$

and locations suitable for development in the Hereford Area Plan (HAP) – a Development Plan Document that will form part of the Herefordshire Local Plan.

The HELAA has been produced in three volumes, due to the large amount of information contained and for ease of reference.

Volume 1 (this report) is the HELAA report

Volume 2 contains the site schedules a summary of all the site information

Volume 3 contains the individual site maps

The HELAA has been produced in accordance with national planning policy and practice guidance, and should be reviewed and updated on a regular basis.

The HELAA itself does not set policy but provides background evidence on the potential availability of land for housing and economic development . The potential maximum capacity identified in the site assessments is an indicative figure, and represents a high level estimation based upon available information.

Whilst the HELAA identifies potential housing and economic development sites, the decision on allocation will be made through the Local Plan's constituent documents.

The identification of sites in the HELAA should not be taken as an intention to allocate these sites for housing/economic development or that planning permission will be granted.

2 INTRODUCTION

2.1 Purpose of the Study

The Hereford Housing and Economic Land Availability Assessment (HELAA)⁷ 2015 has been undertaken by the URS Strategic Planning and Urban Design (now AECOM⁸) team supported by property consultant Simon Drummond-Hay (MRICS) of HDH Planning and Development LTD (HDH).

The HELAA follows the methodology and principles set out in Planning Practice Guidance on Housing and Economic Land Availability Assessment (DCLG, March 2014) which supersedes guidance contained in the SHLAA Practice Guidance (DCLG, July 2007).⁹

The Housing and Economic Land Availability Assessment (HELAA) is limited to Hereford urban area and its immediate surroundings and is intended to inform the options for development within the forthcoming Hereford Area Plan. It is also one of several evidence base documents that underpin the Herefordshire Local Plan – Core Strategy, which has undergone an examination in public and, upon adoption, will replace the current adopted Herefordshire Unitary Development Plan (2007). Further information on the Local Plan - Core Strategy, the Hereford Area Plan and supporting evidence base documents can be viewed at the Council's Offices or on the Council's Website at <https://www.herefordshire.gov.uk>

The primary purpose of this HELAA is to identify sites with potential for housing or economic development and assess the development capacity of each site and an estimated timeframe for development. Although the HELAA is an important evidence source to inform plan making, it does not determine whether a site should be allocated for housing development. The HELAA aims to identify as many sites with housing potential as possible in the study area to meet housing requirements for at least the first 15 years of the Local Plan period. As such, it provides a pool of potential housing sites from which the Local Plan can draw on.

It therefore follows that the identification of sites in the HELAA should not be taken as an intention to allocate these sites for housing/economic development or that planning permission will be granted.

2.2 Structure of the report

The HELAA is set out in 3 volumes:

⁷ The HELAA is also sometimes known as a SHLAA (Strategic Housing Land Availability Assessment)

⁸ In January 2015, URS and AECOM became one company, AECOM. The Strategic Housing Land Availability Assessment was carried out in 2014 as URS

⁹ Housing and Economic Land Availability Assessment Planning Practice Guidance was published on in March 2014 and is available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>

- Volume 1: HELAA Report (this report)
- Volume 2: Site Schedules. This contains the detailed site appraisal results.
- Volume 3: Map Report: This contains site plans of all sites included in the HELAA.

3 PLANNING POLICY CONTEXT

3.1 National Planning Policy Context

The National Planning Policy Framework (March 2012)

The NPPF, published on 27th March 2012, condensed all planning policy statements (PPSs) into a single, all-encompassing planning framework with the intention of making the planning system less complex and more accessible. It sets out the Government's planning policies for England and how these are expected to be applied.

Core to the NPPF is the “presumption in favour of sustainable development” which should be seen as a ‘golden thread’ running through decision taking and should be the “basis of every decision made” (paragraph 14). Paragraph 47 of the NPPF recognises a need to “significantly boost the supply of housing” and sets out measures that local planning authorities should employ to achieve this including:

- the identification of a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; and
- illustration of the expected rate of housing delivery through a housing trajectory for the plan period and a housing implementation strategy for a full range of housing describing how the local planning authority will maintain delivery of a five-year supply of housing land to meet their housing target for market and affordable housing.

In accordance with the NPPF local planning authorities can make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. However, any allowance should be realistic having regard to the SHLAA or HELAA, historic windfall delivery rates and expected future trends, and should not include residential gardens (paragraph 48).

Contained in paragraph 159 is a specific requirement for local planning authorities to prepare a SHLAA in order to establish realistic assumptions on the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period. The NPPF encourages reviews of land available for economic development to be undertaken at the same time as, or combined with, SHLAAs (paragraph 161).

Regarding the assessment of potential sites for housing footnote 11 and 12 of the NPPF provides additional guidance on the definition of site ‘deliverability’. Footnote 11 states that: “To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission

expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”Footnote 12 states that:“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.”Further guidance on the assessment of potential development sites is provided in the recently published National Planning Practice Guidance, discussed below.

National Planning Practice Guidance (March 2014)

In 2014 the Government published new planning practice guidance on the assessment of land availability referred to as ‘Housing and Economic Land Availability Assessment’.

This guidance replaces the SHLAA Practice Guidance (2007).

The NPPG sets out the methodology for assessing housing land availability in the context of guidance contained in the NPPF centred on five stages:

Stage 1: Identification of sites and broad locations

Stage 2: Site/broad location assessment

Stage 3: Windfall assessment (where justified)

Stage 4: Assessment review

Stage 5: Final evidence base

Consistent with the NPPF, the NPPG acknowledges the advantages of carrying out land assessments for housing and economic development as part of the same exercise so that sites may be allocated for the use that is considered to be most appropriate. The NPPG states that land availability assessment should:

- identify sites and broad locations with potential for development;
- assess their development potential; and
- assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

In line with the duty to cooperate the NPPG requires local planning authorities to work with other local planning authorities within the relevant housing market area or functional economic market area when assessing availability of land. Key stakeholders should be involved from the earliest stages of preparation including, amongst others; developers, land promoters, local property agents, parish councils and local communities.

The NPPG requires plan makers to be proactive in identifying as wide a range of sites as possible, including existing sites that could be improved, intensified or changed. Sites that have particular policy constraints should also be included. However, constraints should be clearly set out and tested, with conclusions drawn on whether constraints can be overcome.

The assessment of suitability of sites for development should be guided by the development plan, emerging plan policy and national policy, as well as market and industry requirements. The NPPG notes that when assessing sites against the adopted development plan, regard should be had to how up to date the plan policies are. Sites in existing development plans, or with planning permission, will generally be considered suitable for development although it may be necessary to assess whether circumstances have changed which would alter their suitability. The following factors should also be considered when assessing suitability:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

With regard to availability the NPPG states that:

“A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is available.”

Consideration should also be given to the delivery record of developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions. In this regard a judgment would need to be made on whether there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. Essentially this is a judgment based on economic viability.

Once potential sites and broad locations have been assessed the NPPG requires information to be collected to produce an indicative housing trajectory, to enable the preparation of an overall risk assessment. To ensure consistency, accessibility and transparency across assessment the NPPG specifically requires the following:

- a list of all sites or broad locations considered, cross-referenced to their locations on maps;

- an assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
- contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;
- the potential type and quantity of development that could be delivered on each site/broad location, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- an indicative trajectory of anticipated development and consideration of associated risks.

Assessments are also required to be made publicly available in an accessible form and reviewed regularly.

3.2 Herefordshire Planning Policy Context

Herefordshire Local Plan. Core Strategy 2011 – 2031 Shaping our Place. Independent Examination February 2015

The Herefordshire Local Plan will comprise a number of statutory planning documents including the Core Strategy which is an overall strategic planning framework for Herefordshire over the next two decades.

Herefordshire Council submitted its Local Plan Core Strategy to the Planning Inspectorate in September 2014 and it underwent independent examination in February 2015. During the Spring and Summer of 2015 a number of modifications were consulted upon and the Inspector's Report is expected to be completed in the early Autumn of 2015. Once adopted, the Core Strategy's policies will replace those of the Herefordshire Unitary Development Plan (against which current planning applications are determined). The Core Strategy identifies Hereford as the focus for new housing development because of its existing easy access to services and facilities. Additional growth will also help to maintain its role as a service centre and contribute to future regeneration through provision of additional services and facilities required to support new development.

The Core Strategy Policy SS2 proposes the delivery of a minimum of 16,500 homes in Herefordshire between 2011 and 2031 to meet market and affordable need. Hereford, as the focus for new housing development, is expected to accommodate a minimum of 6,500 of these new homes. The delivery of housing levels and distribution proposed in the Core Strategy is dependent upon necessary infrastructure being funded and delivered. A detailed trajectory is set out in Appendix 4 of the Core Strategy. The delivery of housing will be monitored throughout the plan period and may need re-adjustment and added detail to reflect progress on the delivery of the strategic sites and key elements of infrastructure.

The Core Strategy explains that an allowance has been made for 'windfalls' which are sites that become available unexpectedly and are not identified in the SHLAA, such as conversions to housing. As there is evidence of longstanding contribution of windfall sites

to the housing supply in Herefordshire, an allowance of 50 dwellings a year has been made for the urban area of Hereford.

The following policies (HD1, HD2, HD4, HD5, HD6) relate to the main areas for growth within Hereford and urban extensions to the Hereford Urban Area Policy HD1-Hereford.

Hereford will accommodate a minimum of 6,500 new homes within the plan period and a minimum of 15 ha of new employment land.

Major residential development will take place in the following locations:

- Around 800 new dwellings in Hereford City Centre (HD2)
- Around 500 dwellings at the Northern Urban Expansion Area (HD4)
- Around 1,000 dwellings at the Western Urban Expansion Area (HD5)
- Around 1,000 dwellings at the Southern Urban Expansion Area (HD6)

The remaining housing requirement of around 3,200 dwellings will be provided through the implementation of existing commitments, windfall development and non-strategic sites allocated through the Hereford Area Plan or Neighbourhood Development Plans.

Policy HD2 – Hereford city centre

The city centre will accommodate around 800 new homes, the majority to be located within a new urban village. Further residential development will take place through the implementation of existing commitments, re-development of existing brownfield sites, re-use of upper floors above commercial premises, infill development and site allocations through the Hereford Area Plan. A target of 35% of these new homes will be mixed tenure affordable with a density that is compatible with the sustainable urban location of the site.

The urban village will be served by safe and attractive pedestrian and cycle links to other areas of the city, the new transport interchange, the Courtyard Arts Centre and nearby areas of green space. A new Link Road will also serve development parcels forming part of the urban village connecting Edgar Street to the west and Commercial Road to the east (with a spur linking Blackfriars Street to the south), as well as assisting in reducing traffic within the core of the city.

Newmarket Street, Blueschool Street and Commercial Square will be re-designed to become safe and attractive routes for pedestrian and cyclists, with improved public transport facilities and enhanced connectivity between the historic city centre and regeneration area partly facilitated by the construction of the new link road.

The urban village will be complemented by other uses and infrastructure forming part of the wider regeneration area, creating a sustainable mixed use development which respects and, where possible, enhances the historic environment. These include the following:

- land and contributions towards a canal basin forming the terminus of the Herefordshire and Gloucestershire Canal, which is being delivered by the Hereford and Gloucester Canal Trust;
- each stage of development which adjoins Widemarsh Brook will maximise opportunities for enhanced biodiversity, to provide flood relief and sustainable surface water drainage solutions and optimised as a green infrastructure link;
- Herefordshire Council, in partnership with public transport operators will deliver an integrated transport interchange close to the railway station to maximise opportunities for sustainable travel;
- opportunities for new commercial, tourism, education, including tertiary facilities, leisure, health, civic and police and fire uses will be available to meet any identified need;
- Herefordshire Council will work with the tenant(s) of Edgar Street football stadium to explore opportunities for sports-led mixed-use redevelopment; and
- new public car parking facilities.

In order to maintain and enhance the viability and vitality of the city centre, new retail uses will be focused to the core of the city centre as defined below. Any identified need for further major retail development over the plan period will be met within the Eign Gate regeneration area and that part of the Edgar Street regeneration area which lies within the defined town centre, including the Old Market, along Blueschool Street and through the refurbishment and redevelopment of the Buttermarket.

Within Hereford city centre, new developments including changes of use will be approved where they:

- provide new commercial and office space in appropriate city centre locations including above existing retail and commercial premises; 55Herefordshire Local Plan – Core Strategy 2011-2031 Pre-Submission Publication Version Spring 2014
- maintain and enhance the vitality and viability of the city centre. Proposals for town centre uses outside the defined town centre will be subject to the sequential test and applications for development over 700 m² gross floor space will require an impact assessment to determine whether there could be any adverse impacts on the town centre;
- improve overall accessibility by walking, cycling and public transport;
- provide new, or enhanced sport, recreation and leisure facilities for local residents and visitors;
- provide new and improve existing cultural and tourism attractions and facilities, which respect the city's historic character and local distinctiveness;
- enable the provision of a canal basin with associated wharfage and visitor centre;
- enable the protection, conservation and enhancement of Hereford's heritage assets, their significance and setting, including archaeology with particular regard to historic street patterns and the skyline.

Policy HD4 – Northern Urban Expansion (Holmer West)

Land at Holmer west will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford and the wider landscape, through high design and sustainability standards. Any potential impacts on the local environment, heritage assets including their significance and setting, or biodiversity should be mitigated and measures taken to conserve and enhance areas of important environmental, historic and landscape quality.. The development will be expected to provide:

- 500 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- Park and Choose site (land and infrastructure) adjacent to the western side of the A49 in close proximity to the Hereford Relief Road and land or a contribution to facilitate the construction of the adjoining phase of the Hereford Relief Road;
- walking and cycle routes and green infrastructure corridors linking to the Park and Choose site, the existing public right of way network and existing education and community facilities and employment sites in the locality;
- appropriate new green buffers and linear green routes, particularly along Ayles Brook;
- measures to mitigate flood risk both for the new homes within the expansion area and for the benefit of existing residents and businesses in other parts of the city through the incorporation of sustainable urban drainage solutions, as part of the green infrastructure network and measures to control water levels within Ayles Brook;
- appropriate provision of and contributions towards indoor and outdoor sports and play facilities, open space and allotments;
- where appropriate, a contribution towards a pre-school facility and contributions towards the enhancement of existing primary and secondary school provision and any identified need for other community infrastructure/facilities; and
- sustainable standards of design and construction.

This expansion area will be accessed primarily off the A4103 Roman Road. The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key infrastructure.

Policy HD5 – Western Urban Expansion (Three Elms)

Land at Three Elms will deliver a comprehensively planned sustainable urban expansion. The development will be expected to provide:

- a minimum of 1,000 homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- delivery of land and infrastructure to facilitate the construction of the adjoining phase of the Hereford Relief Road;
- a minimum of 10 hectares of employment land, comprising predominantly of a mixture of use class B1, B2 and B8 located near to the new livestock market with access to the Hereford Relief Road and Roman Road;
- land and infrastructure for Park and Choose facilities;
- a new linear park along the Yazor Brook corridor connecting with the existing green infrastructure links east of the expansion area, the public rights of way network within and adjoining the expansion area and informal recreation space;
- a series of new green infrastructure connections which enhance the biodiversity value of the area and also serve as pedestrian cycle links through the development, including optimising the use of the disused railway line to connect with the transport interchange, schools, community facilities, employment land and the remainder of the city;
- provision for new bus links through the expansion area;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;
- the provision on site of appropriate sports and play facilities, formal and informal open space, community orchards, woodland planting and allotments;
- integration of Huntington village into the development area in a way which respects, protects, conserves and, where possible, enhances the setting of the Conservation Area and heritage assets;
- 210 primary school places and, where appropriate, contributions towards new pre-school facilities;
- an extension of Whitecross High School to increase capacity from a 6 form entry to 7 form entry school, with commensurate school playing field provision;
- a neighbourhood community hub to meet any identified need for small scale convenience retail, community meeting space, health provision, indoor sports and other community infrastructure/facilities, where appropriate;
- sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network;
- opportunities to mitigate flood risk arising from Yazor Brook for existing residents and businesses within the city; and
- sustainable standards of design and construction.

The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure. Policy HD6 -Southern Urban Expansion (Lower Bullingham)

Land at Lower Bullingham will deliver a comprehensively planned sustainable urban expansion. The new development will be sensitively integrated into both the existing urban fabric of Hereford and the wider landscape, through high design and sustainability standards. The development will be expected to provide:

- a minimum of 1,000 new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types that meet the requirements of policy H3 and the needs identified in the latest version of the Herefordshire Local Housing Market Assessment;
- a target of 35% of the total number of dwellings shall be affordable housing;
- around 5 hectares of employment land comprising a mixture of use class B1, B2 and B8 to complement Hereford Enterprise Zone;
- suitable vehicular access to the site principally from the B4399;
- Park and Choose site (land and infrastructure) adjacent to the A49/ Rotherwas Access Road roundabout;
- green infrastructure corridors through the area to include strategic greenways along Red Brook and Norton Brook and links with Withy Brook;
- creation of a country park to incorporate new footpaths linking with the existing public right of way network in the locality, woodland and orchard planting;
- development of bespoke, high quality and inclusive design, including accommodation that will meet the needs of older persons and contributes to the distinctiveness of the site and surrounding environment;
- the provision on site of appropriate sports and play facilities, open space, community orchards and allotments;
- 210 primary school places and, where appropriate, contributions towards new additional pre-school facilities;
- a neighbourhood community hub, including small scale convenience retail and provision of and/or contributions towards any identified need for other community infrastructure/facilities, including community meeting space and health provision, indoor and outdoor sports, where appropriate;
- sustainable urban drainage and flood mitigation solutions to form an integral part of the green infrastructure network;
- new direct walking, cycling and connection to bus routes from the urban extension to the Park and Choose to the west, Hereford Enterprise Zone to the east and existing communities and the city centre to the north;
- sustainable standards of design and construction; and

- the protection, conservation and where possible enhancement of heritage assets, their significance and setting. An evaluation of the archaeological importance of the area should be provided to ensure appropriate protection of heritage assets and inform the detailed development proposals.

The area will be planned in a comprehensive manner to show the layout of development and the required infrastructure. Appendix 5 sets out the relationship between the development of urban expansion areas and the provision of key new infrastructure.

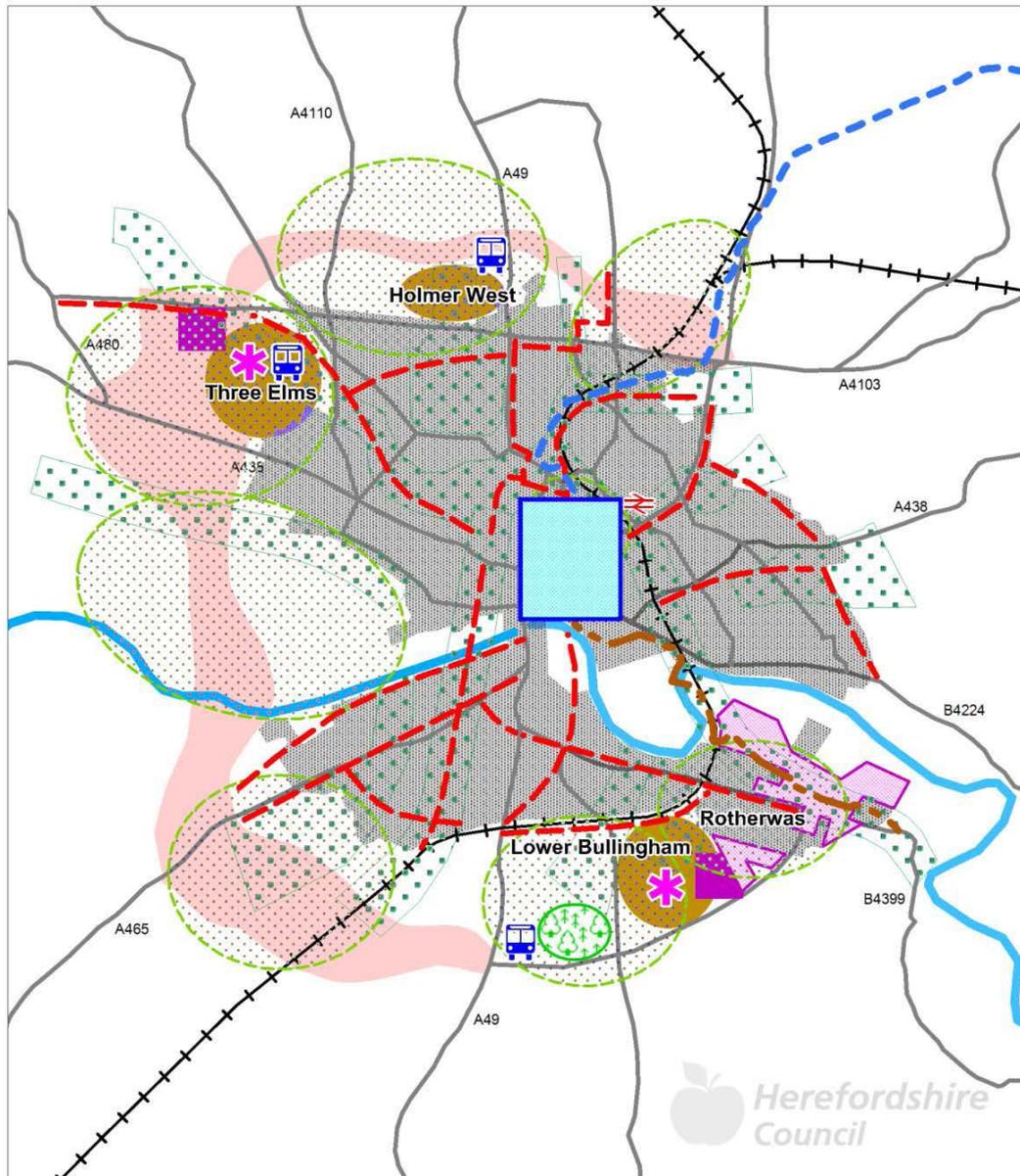
Policy H1 -Affordable housing – thresholds and targets

All new open market housing proposals on sites of more than 10 dwellings, which have a maximum combined gross floor space of more than 1,000m² will be expected to contribute towards meeting affordable housing needs.

The amount and mix of affordable housing, including those on strategic housing sites, will vary depending on evidence of housing need as identified through the latest housing market assessment, and an assessment of the viability of the development. The following indicative targets have been established based on evidence of need and viability in the county's housing market and housing value areas:

1. a target of 35% affordable housing provision on sites in the Hereford, Hereford Northern and Southern Hinterlands, and Kington and West Herefordshire housing value areas;
2. a target of 40% affordable housing provision on sites in the Ledbury, Ross and Rural Hinterlands; and Northern Rural housing value areas (which includes Bromyard);
3. a target of 25% affordable housing provision on sites in the Leominster housing value area.

Any affordable housing provided under the terms of this policy will be expected to be available in perpetuity for those in local housing need.



Hereford Key Diagram

- | | | |
|---|---|--|
|  New Housing |  Country Park |  Local Strategic Corridors |
|  Relief Road Corridor |  City Centre |  Local Enhancement Zones |
|  New Primary School |  Rotherwas Enterprise Zone |  Connect 2 Cycle route |
|  Park & Ride Site / Public Transport Interchange |  New Employment |  Improve Connectivity |
| |  Hereford & Gloucester Canal | |



Not to Scale for diagrammatic purposes only

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Herefordshire Unitary Development Plan

The Herefordshire Unitary Development Plan (UDP) was adopted on the 23rd March 2007. The Unitary Development Plan is the current Development Plan for Herefordshire. Its policies have been formally “saved” and will continue to guide development within the county until the adoption of the Local Plan - Core Strategy, unless they are in conflict with guidance contained in the NPPF.

Policy S3 of the UDP provides for additional dwellings to be built at an annual rate of 800 dwellings between 2001 and 2007 and for 600 dwellings a year to be built between 2007 and 2011. It gives priority to the use of previously developed land, ahead of urban extensions and proposes a four tier settlement hierarchy to meet the housing requirement. This hierarchy requires most of the housing requirement to be concentrated in Hereford (the first tier) and the market towns (the second tier) (Policy H3). The third tier relates to the allocation of housing sites in the more sustainable main villages, although it was recognised that there will be some windfall development (Policy H5). The fourth tier caters for other rural housing needs, essentially through windfall developments on infill plots in named smaller settlements (Policy H6).

The need for affordable homes was identified as being 2,300 homes over the plan period.

The Hereford Area Plan

The Hereford Area Plan (HAP) is in the process of being prepared. It will, amongst other things, set out allocations of land for development.

The HAP will include strategic sites in and/or on the edge of Hereford (i.e. sites of more than 100 dwellings) to achieve the planned growth of the City, as set out in the Core Strategy. The Council recognises that the balanced growth of Hereford is critical to the wellbeing of both the City and the County.

Community Infrastructure Levy

Herefordshire Council has developed a Preliminary Draft Charging Schedule which introduces charge variations by geographical zone and land use. A consultation was undertaken on the Preliminary Draft Charging Schedule in March – April 2013.

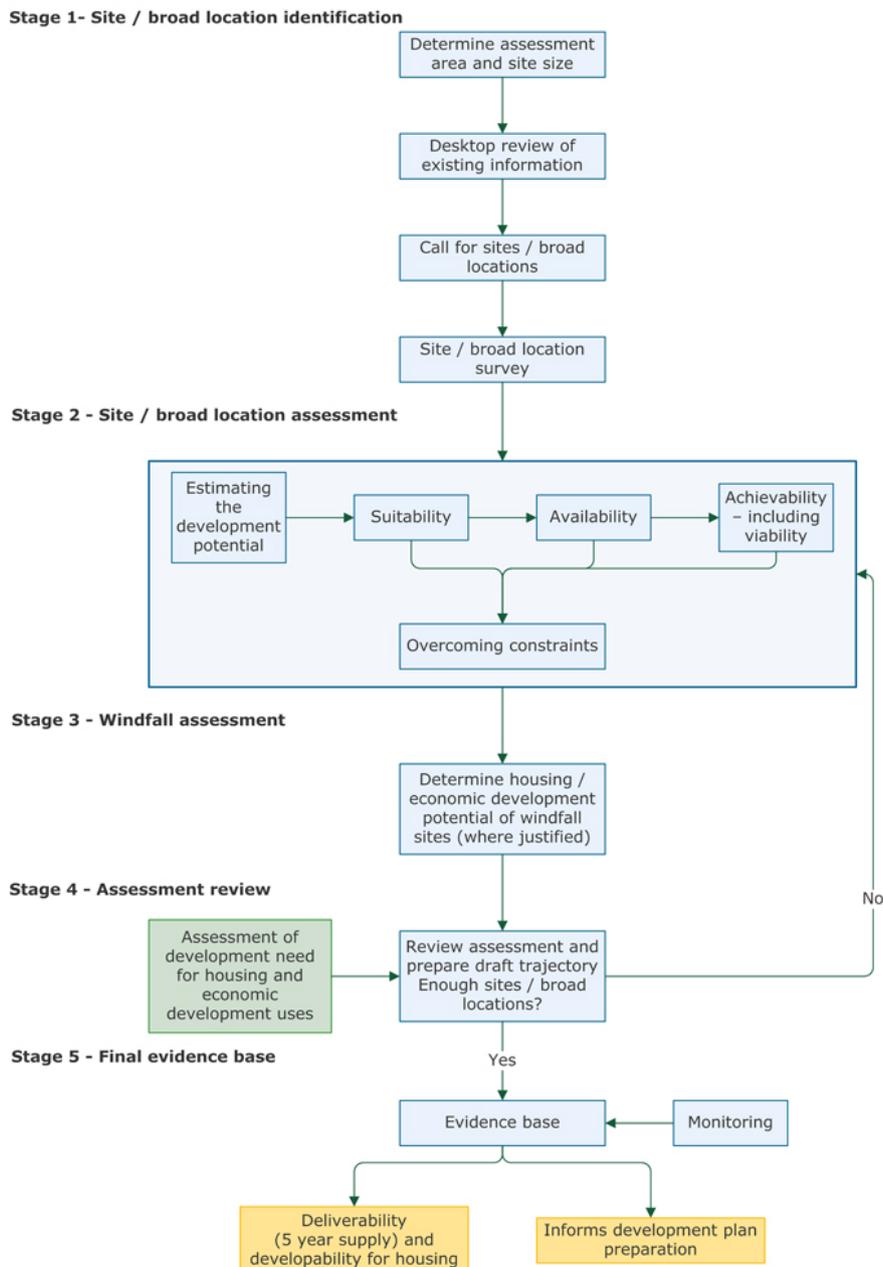
A further round of consultation will be undertaken on the CIL in late 2015 or early 2016. Further information regarding the Preliminary Draft Charging Schedule can be seen on the Council’s website.

4 METHODOLOGY

4.1 Introduction

The following methodology sets out the approach that has been taken to assess housing and economic land availability in Hereford. The methodology is based on guidelines set by the Government in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (PPG). For ease of comparison we have structured our methodology in line with the five stages set out in the PPG, as shown below in Figure 4.1.

Figure 4.1: NPPG Methodology



Source: DCLG, NPPG 'Housing and Economic Land Availability Assessment', 6th March 2014.

It should be noted that the assessment has identified as wide a range of sites as possible, irrespective of the housing and employment targets set out in the emerging Core Strategy in Hereford over the plan period.

4.2 Stage 1: Site/broad location identification

Stage 1a: Determine assessment area and site size

The HELAA “area of search” is confined to the main city of Hereford and land immediately adjoining the development boundaries. The assessment has identified all greenfield and brownfield sites/broad locations within and/or adjacent to Hereford City.¹⁰

This approach is contrary to PPG which recommends that the assessment considers the entire housing market area. However, this is intentionally a focused assessment which only considers the urban area of Hereford.

The assessment considers sites capable of accommodating 5 or more dwellings or economic development on sites of 0.25ha or 500m² and above.

Sites excluded from the assessment at an early stage include sites constrained by national environmental designations, which would entirely preclude development. These include:

- Ancient Woodlands;
- Areas entirely within Flood Risk Zone 3;
- Local Nature Reserves;
- Sites of Scientific Interest;
- Special Areas of Conservation;
- Historic Parks and Gardens

A full list of sites and broad locations has been reviewed by the Council’s Development Management officers to confirm their eligibility for inclusion in the assessment. This review particularly focussed on planning permissions (extant or otherwise), refusals, sites that officers are aware of through pre-application discussions, National Land Use Database (NLUD) returns, commercial land availability register and sites submitted through the 2013 ‘call for sites’ exercise. Any inconsistencies or gaps that were established were reviewed and addressed with site information updated accordingly.

All site information was collated in an Excel database. Site boundaries were mapped using a Geographical Information System (GIS) and an Ordnance Survey base map. Sites were linked to the database using a reference codes by ward.

Stage 1b: Desk top review of existing information

¹⁰ For the purpose of this assessment Hereford City is defined by the built up area boundary shown on the Proposals Map to the UDP.

To provide an initial list of sites/broad locations a desk top review of existing information was undertaken. In summary this stage included a review of:

- The existing 2012 SHLAA database, which includes
 - sites from previous SHLAA surveys and urban capacity studies
 - sites identified by officers
 - call for sites
 - sites promoted to the Council by landowners, developers or agents
 - any other known sites, including vacant and derelict land, surplus public sector land, land in non-residential use or potential urban extensions that could be improved, intensified or changed
- Planning application records to establish sites that have planning permission for housing and economic development that are unimplemented or under construction;
- Planning applications records to establish applications for sites that have been refused or withdrawn but are still 'live';
- Extant planning policy documents to identify existing housing and economic development allocations without planning permission;
- Emerging planning policy documents to identify proposed future housing and economic development allocations without planning permission;

Stage 1c: Call for sites/broad locations

Sites submitted to Herefordshire Council by developers or landowners, including through the 2013 'call for sites' exercise, were included in the HELAA.

To update this information, a further call for sites was carried out with all known developers, landowners and agents to establish the position on previously submitted sites and to invite respondents to submit further sites with potential for housing or economic development. This was carried out during April and May 2014.

Stage 1d: Site/broad location survey

A site survey was not carried out as part of this work. Instead, a desktop survey was undertaken to establish that the necessary up to date information for each site was included in the database. This included:

- Site size, boundary and location;
- Current land use and character;
- Land uses and character of surrounding area;
- Physical constraints (e.g. access, contaminations, steep slopes, flooding, natural features of significance, location of infrastructure / utilities);
- Potential environmental constraints;
- Where relevant, development progress (e.g. ground works completed, proportion of site complete);

- Initial assessment of whether the site is suitable for a particular type of use (housing or economic development) or as part of a mixed use development.

It should be noted that all sites were re-assessed to ensure that previous assumptions regarding suitability and capacity were consistent with current assumptions, based on up to date planning policy guidance. Inconsistencies identified through this survey were updated in the database and on the GIS map, where necessary.

4.3 **Stage 2: Site/broad location assessment**

Stage 2a: Estimating the development potential of each site / broad location

Each site has been assessed to judge whether or not the site is suitable, available and achievable for housing or economic development. Our approach to assessing each is set out below.

Stage 2b: Suitability Assessment

Sites were first assessed for their suitability. In line with the current PPG the following factors were considered to assess suitability for housing:

- Policy restrictions - such as environmental designations, protected areas and existing planning policy.
- Physical problems or limitations - such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- Potential impacts - including effect on landscape features and conservation; and
- Environmental conditions – such as those which would be experienced by prospective residents.
- Sites designated as protected employment sites are discounted from the assessment, unless there is evidence of availability for housing.
- Sites with constraints that are considered to be insurmountable, such as lack of access, the presence of national or local environmental designations or severe or multiple physical constraints were assessed as unsuitable.

Where a site was partially constrained by environmental or physical factors, but a portion of the site was potentially developable, the site area was adjusted to reflect the developable area and the calculation of capacity was applied to the reduced site area.

A separate assessment was carried out to judge whether the sites were suitable for an alternative economic development use, including B1, B2 and B8 uses. This took into account factors such as location, existing use and policy context.

Stage 2c: Availability Assessment

Assessment of availability was based on the definition set out in the NPPG which states that:

“A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and

legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners.”

For this purpose of this assessment, availability was assessed through interrogation of site ownership information held by the Council, in addition to a “call for sites” during April 2014 including contacting all known landowners, developers and agents. In line with the PPG planning permissions have been considered to be deliverable unless there was clear intelligence that such permissions will not be implemented within 5 years.

Where there is no evidence of the availability of privately owned sites, these sites have been discounted from the HELAA. However the site information is held in the HELAA database for monitoring purposes, should evidence of availability emerge in future HELAA reviews. It is recommended that the owner’s intentions on the sites included in the HELAA is monitored and if sites become available the information is recorded as part of an ongoing HELAA update.

Where a site is publically owned, it has been assessed on a case by case basis. In most cases the site has been assessed as available unless there is evidence to the contrary. In some cases, where the site is clearly operational and an important asset to the town, with no evidence that a landowner is intending to sell or develop the site, it has been assessed as unavailable.

Stage 2d: Achievability and Viability Assessment

This element of work drew upon existing available evidence and also new work carried out in line with new guidance on this topic.

Assessing the potential capacity of sites

The potential capacity or yield of sites has been determined using a combination of existing evidence from site promoters and a judgement based on the specific characteristics and constraints of the sites and surrounding areas.

For sites with no existing estimates of capacity, a standard density multiplier has been applied to the net developable area of the site. This is a two stage process:

The net area of the site is the land available for development once other land uses have been taken into account, such as infrastructure and open space. The relationship between the overall site area (the gross area) to the residual land (net area) is call the gross to net ratio. This figure varies according to the site size and context. This HELAA has used the gross to net ratios provided by Herefordshire Council¹¹ to provide an indicative net developable area for each site, as shown in Table 4-1.

¹¹ Gross to net ratios taken from Herefordshire Council Whole Plan Viability Assessment, May 2014.

Table 4-1: HCC HELAA Gross/Net Development Area Assumptions

Site Size (ha)	Gross to Net Ratio (%)
Up to 1	100
1 - 10	75 - 90
11 - 50	60 - 74
50+	55 - 60

The second stage is to apply a density to the site area to estimate the potential capacity of the site. The density of new development is expressed as the number of dwellings per hectare of land (dph). The density is multiplied by the net site area to provide an estimate of the number of dwellings achievable on each site. The range of densities applied are:

- 50 dwellings per hectare for sites within the urban area with good public transport accessibility levels and access to existing infrastructure and services)
- 30-40 dwellings per hectare for sites on the fringes or adjacent to the urban area. These sites have lower levels of public transport accessibility and are less well served by existing infrastructure and services and therefore a lower level of housing is more appropriate. .

The resulting capacity for each site has been expressed as a range, with a low and high estimate. The final figure used is a midpoint between the two figures. A range is helpful to reflect different types of housing that could come forward on site and can indicate what the changes to the overall capacity may be with changes in planning policy.

Assessing viability of sites (achievability)

The definition of viability followed in this HELAA is taken from the recent Harman guidance¹² and is as follows:

An individual development can be said to be viable if, after taking account of all costs, including central and local government policy and regulatory costs and the cost and availability of development finance, the scheme provides a competitive return to the developer to ensure that development takes place and generates a land value sufficient to persuade the land owner to sell the land for the development proposed. If these conditions are not met, a scheme will not be delivered.

The availability and cost of land are matters at the core of viability for any property development. The format of the typical valuation is shown below:

¹² *Viability Testing in Local Plans – Advice for planning practitioners* (LGA/HBF – Sir John Harman) June 2012¹² (known as the **Harman Guidance**).

$$\begin{array}{c} \textbf{Gross Development Value} \\ \text{(The combined value of the complete development)} \\ \\ \text{LESS} \\ \\ \textbf{Cost of creating the asset, including a profit} \\ \textbf{margin} \\ \text{(Construction + fees + finance charges)} \\ \\ = \\ \\ \textbf{Residual Value} \end{array}$$

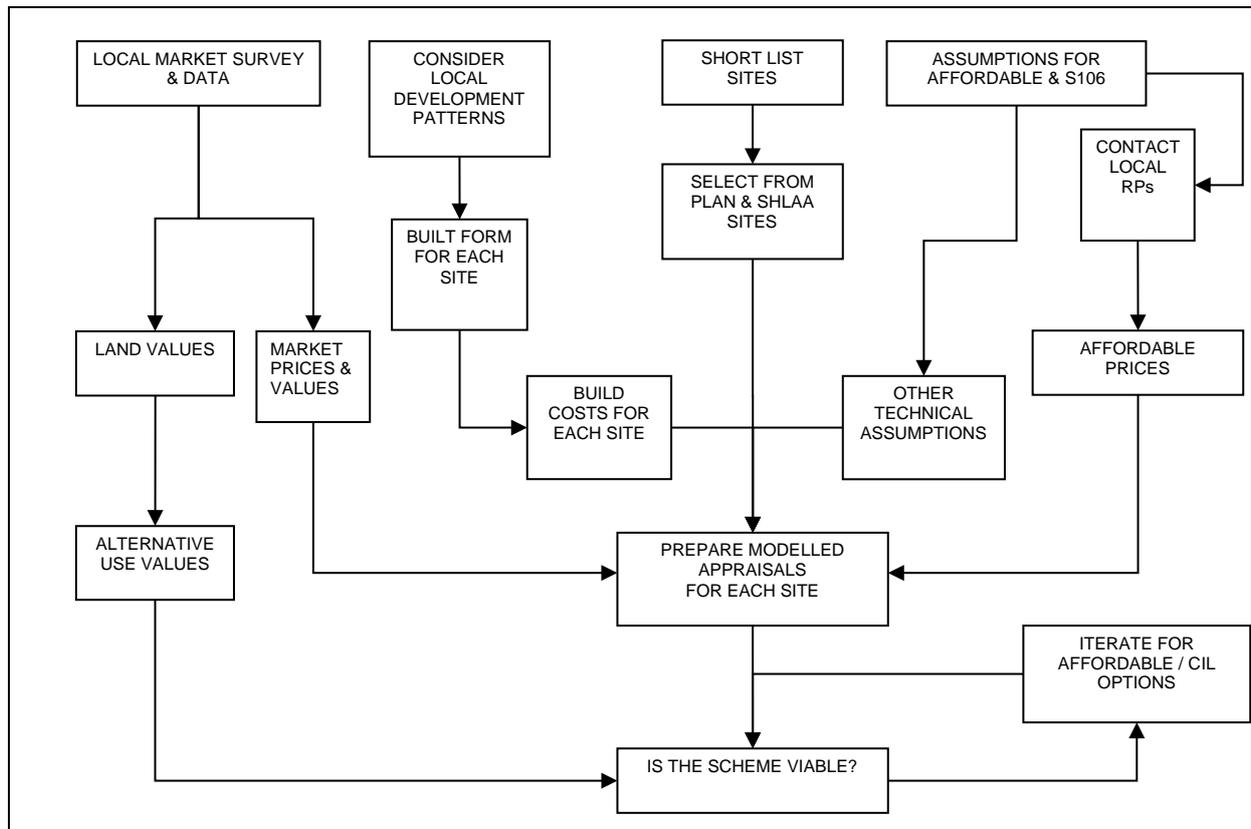
The result of the calculation indicates a land value, the Residual Value, which is the upper limit of what a bidder could offer for a site and still make a satisfactory profit; this should take in to account ‘competitive return’ i.e. the reward the developer receives for taking the risk of development. Essentially the more policy requirements and developer contributions that a planning authority seeks, the less the developer can afford to pay for the land. Similarly, the more expensive land is to develop, i.e. due to the cost of site clearance and/or remediation, the less profitable the development will be. In viability testing the essential balance is between land value and when land will and will not come forward for development.

The assessment of deliverability as required under the NPPF is not done through a calculation or a formula. The basic viability methodology is summarised in Figure 4.1. It involves preparing financial development appraisals for a representative range of sites, and using these to assess whether development, generally, is viable. The sites were modelled based on discussions with Council officers, the existing available evidence supplied to us by the Council, and on our own experience of development. Details of the site modelling are set out in Chapter 9. This process ensures that the appraisals are representative of typical development in Hereford and adjacent areas.

The appraisals are based on Herefordshire Local Plan – Core Strategy 2011-2031 Pre-Submission Publication Version Spring 2014 policy requirements and include appropriate sensitivity testing of a range of scenarios including different levels of affordable housing provision.

We surveyed the local property market, in order to obtain a picture of sales values. We also assessed land values to calibrate the appraisals and to assess existing and alternative use values. Alongside this we considered local development patterns, in order to arrive at appropriate built form assumptions for those sites where information from a current planning permission or application was not available. These in turn informed the appropriate build cost figures. A number of other technical assumptions were required before appraisals could be produced. The appraisal results were in the form of £/ha ‘residual’ land values, showing the maximum value a developer could pay for the site and still return a target profit level.

Figure 4.1: Viability Methodology



Source: HDH 2014

The Residual Value was compared to the Alternative Use Value for each site. Only if the Residual Value exceeded the Alternative Use Value / Existing Use Value figure by a satisfactory margin, could the scheme be judged to be viable.

We have used a bespoke viability testing model designed and developed by us specifically for area wide viability testing as required by the NPPF (and CIL Regulation 14)¹³. The purpose of the viability model and testing is not to exactly mirror any particular business model used by those companies, organisations and people involved in property development. The purpose is to capture the generality and to provide high level advice to assist the Council in assessing the deliverability of the Plan.

The viability assessment of each site has been assessed alongside the suitability and availability of the site. The results have been incorporated into the overall assessment of whether the site is developable (has potential to be delivered in the first five years) or deliverable (has potential to be delivered at some point in the future). A full viability report has been prepared and provided to Herefordshire Council as part of the HELAA.

¹³ This Viability Model used is one that forms the basis for the Planning Advisory Service (PAS) viability workshops.

4.4 **Stage 3: Windfall assessment**

The NPPF states that a windfall allowance can be justified in the five year supply of housing if there is compelling evidence that such sites have consistently come forward in the past and will continue to provide a reliable source of supply. As part of this assessment the figure of 50 dwellings a year as windfall housing has been applied, which has been taken from the Core Strategy¹⁴.

4.5 **Stage 4: Assessment review**

This stage has involved a review of the results of the assessment and the trajectory of sites across the plan period. This information should be put together with other information monitored by the Council on completions and commitments, to give an overall trajectory for the borough of

- Past completions – allocated sites;
- Past completions – unallocated sites;
- Projections – allocated sites;
- Projections – unallocated sites;
- Total past completions;
- Total projected completions;
- Cumulative completions;
- PLAN – strategic allocation;
- MONITOR – number of dwellings above or below the cumulative allocation; and
MANAGE – annual requirement taking account of past / projected completions.

The focus of this task has been to provide an interim housing trajectory which is flexible enough to be updated regularly once the HELAA has been handed over. .

4.6 **Stage 5: Final evidence base**

The final report includes the following outputs in accordance with the Practice Guidance:

- A list of all sites or broad locations considered (Volume 2), cross-referenced to their locations on maps (Volume 3);
- An assessment of each site or broad location, in terms of its suitability for development, availability and achievability including whether the site/broad location is viable) to determine whether a site is realistically expected to be developed and when;
- Contain more detail for those sites which are considered to be realistic candidates for development, where others have been discounted for clearly evidenced and justified reasons;

¹⁴ Herefordshire Local Plan. Core Strategy 2011-2031 Shaping our Place (Independent Examination Feb 2015) Para 3.50

- The potential type and quantity of development that could be delivered on each site/broad location, including information on barriers to delivery and how these could be overcome
- An indicative trajectory of anticipated development on HELAA sites and consideration of associated risks.

The assessment will be made publically available on Herefordshire Council's website in an accessible form.

5 HELAA RESULTS

5.1 Introduction

This section of the HELAA report sets out the final results of the study. The results are displayed by ward and include the number of sites identified in each ward, the total housing capacity across all sites in each ward and the expected delivery timescale of the development. A detailed set of results for each site, which includes the evidence on site suitability, availability and viability which informed the site assessments within each ward is set out in Volume 2: Site schedules.

- The total number of sites originally considered as part of the HELAA was 291. A number of these were ruled out at an early stage as they were not within or adjoining the urban area of Hereford. The number of sites assessed as part of the HELAA was 126¹⁵. 71 were found to be suitable, available and achievable, in terms of the definitions set out above.
- The total housing capacity from these sites is **13,898** dwellings over 15 years. There is potential for sites with a capacity for a further **2,359** dwellings to be delivered beyond the first 15 years.
- The total amount of land that may *also* be suitable for economic development or mixed use development is **1221.3ha**. This figure is not exclusively land available for economic development; it represents land that is potentially suitable for either employment or housing.
- There is evidence that windfall sites have historically formed a significant part of the housing supply in Hereford. An allowance for future windfall provision has been included in the HELAA. The amount of housing that is expected to be delivered annually through windfall is **50** dwellings.

The theoretical total potential housing capacity for years 0-15 of the Local Development Plan, including an allowance for windfall sites is therefore **14,498** dwellings.

5.2 Windfall sites

The term “windfall” is defined as sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available.

The NPPF and PPG state that, where justified, windfall sites can contribute towards housing supply. There must be realistic evidence to demonstrate windfall sites will consistently become available. Paragraph 48 of the NPPF allows for justified windfall sites to be included within the 5-year supply. If there are insufficient sites identified to meet the housing and economic development needs, Councils, where justified, can include the provision of windfall sites.

¹⁵ This was after a number of sites were removed as they were outside the urban area of Hereford, or they were already included with a different site reference.

The HELAA does not include sites which are less than 5 dwellings; therefore a windfall allowance in the housing trajectory for these sites will be included as the Council has been able to demonstrate a consistent supply (see Table 5-1). A windfall allowance will be made for years 4-15 of the housing trajectory. This is to avoid double counting because planning permissions are normally valid for 3 years and therefore likely to be completed within this time.

The Core Strategy allows for a figure of 50 dwellings a year as windfall housing. This figure has been applied in the HELAA. If this figure is extrapolated forwards over the first fifteen years of the plan (minus the first 3 years), this would represent a further 600 dwellings.

5.3 Site suitability

Sites were assessed for suitability for housing and economic development.

Sites were assessed as unsuitable for a number of reasons, such as the presence of significant environmental constraints e.g. flood risk, national policy designations that would entirely preclude development e.g. the impact on a Site of Scientific Interest (SSSI) or Area of Natural Beauty (AONB) or a local policy designation that meant the site was protected, such as public open space, or designated for employment use.

Where sites are partially constrained by an environmental or physical factor, the site area was reduced to the area considered suitable for development and the calculation of capacity was applied to the reduced site area.

The reasons why each site was 'accepted' or 'discounted' is set out in Volume 2: Site Schedules.

5.4 Site availability

A number of sites were discounted on the basis that they were not currently available or if the availability of a site was unknown.

A site is available if there is evidence that the landowner is expected to sell or develop the site within the plan period. The time periods used for the HELAA are 0-5 years, 6-10 years, 11- 15 years or beyond 15 years. Each of the sites has been categorised as being deliverable within one of these time periods. Larger sites which are likely to have longer built out rates may span two or even three time periods, because of the complexity of delivering housing and the associated infrastructure on a very large site.

We have assumed a build out rate of 100 dwellings per annum on larger sites (sites over 100 units) and a lead in time of 12 months.

The availability of each site was established through information known to the Council, the 'call for sites' information, and also if information on potential sites had come forward since from a landowner or developer. The 'call for sites' exercise involves inviting all potential landowners, developers, housebuilders, social housing providers and agents as well as the general public, to submit potential housing sites for consideration in the HELAA or in the Local Development Plan.

A call for sites was carried out with all known landowners, developers and agents in April 2014 and this information formed the basis of the HELAA availability assessment.

5.5 Site achievability

The findings of the analysis indicate that most of the HELAA sites would be deliverable in the context of the Council's affordable housing target of 35% and proposed rate of CIL of £100/m². These are two areas where the Council should be cautious. The Residual Value for larger brownfield sites (those above the affordable housing threshold) is well below the viability threshold so the Council should put little weight on these types of site being delivered in the short to medium term. In addition the larger greenfield sites that lie to the south of the Rive Wye to generate Residual Values that exceed the viability threshold but only just. It would therefore be prudent for the Council to engage with the developers and landowners before relying on these types of site to deliver housing in the short to medium term.

Based on the analysis in this HELAA viability assessment the Council can consider most development deliverable and have confidence that it would be forthcoming in the context of the emerging Plan and in particular in the context of the 35% affordable housing target and £100/m² CIL. There are two exceptions to this.

The first are brownfield sites that are subject to the affordable housing requirements (i.e. those that are larger than the 15 unit threshold). These are not shown as viable and should not be considered to be deliverable in the short to medium term.

The second are the larger greenfield sites to the south of Hereford City. In terms of viability these sites are marginal. There is a reasonable prospect of them coming forward however high abnormal or infrastructure costs could put that at risk. We would recommend that the council to engages with the developers and landowners before relying on these sites to deliver housing in the short to medium term. Such an approach would be fully in line with the Harman Guidance that says:

Landowners and site promoters should be prepared to provide sufficient and good quality information at an early stage, rather than waiting until the development management stage. This will allow an informed judgement by the planning authority regarding the inclusion or otherwise of sites based on their potential viability.

The Council is proposing to include some flexibility within its affordable housing policy to permit developers to submit evidence at the time of a planning application to make the case for a lower affordable housing requirement on grounds of viability. Such provisions will mean such sites do come forward – albeit without the full amount of affordable housing.

The analysis of employment uses indicates that such development is not viable in the current market. This is, to some extent, as we would expect. Little development of employment sites is occurring and when one looks across the wider area, the employment development that is happening tends to be on the larger out of town 'parks'. However it is not the Councils' policies that render them unviable – it is a factor of the current difficult economic climate. This sets the Council a real challenge when it comes

to delivering development. Herefordshire County Council, in its limited capacity as a Planning Authority and CIL Charging Authority, are not developers and can only provide an environment conducive for development. This is particularly difficult at a time of budgetary constraint. The Council will need to continue doing what they are doing to facilitate development. The Council has a wide range of existing and emerging initiatives in this regard, although it must be noted that in the current economic climate there is little Government money to provide such help.

The viability report has been prepared as a separate document, which explains the method and results of the viability testing of all the HELAA sites for housing and employment use.

The report also contains information on the current property market and land prices in Herefordshire and the development assumptions used in the viability model.

5.6 HELAA results

Table 5-2 shows the number of potential dwellings that are deliverable (within the first 5 years) and developable (years 6-15) by timescale for Hereford.

The results show that there are a potential 13,898 dwellings deliverable within and adjacent to Hereford in years 0-15 of the plan period.

Table 5-1: Number of dwellings by Timescale (Hereford)

<i>Timescale</i>	<i>Number of dwellings</i>
0-5 years	5231
6-10 years	6149
11-15 years	2518
15+ years	2359
Total dwellings 0-15 years	13,898
Total dwellings including 15 yrs+	16,257
Windfall allowance	50 units per annum

Table 5-3 shows the number of dwellings by ward. The spread of dwellings across wards is not unexpected. The central wards have a relatively small number of potential dwellings, as these are areas that are already built up and opportunities for additional development is limited. The outer wards which include proposed sustainable extensions to the urban area on greenfield sites have the potential to deliver large numbers of new housing and supporting services and infrastructure. The full details behind these summary tables can be found in Volume 2: Site Schedules and the location of the sites can be found in Volume 3: Site Maps.

Table 5-2: Number of dwellings by Ward

Ward	Indicative Capacity (Low)	Indicative Capacity (High)	Indicative Capacity (Mid Point)
Aylestone	182	249	216
Backbury	1,751	2,137	1,899
Belmont	389	467	428
Burghill, Holmer and Lyde	2,082	2,543	2,312
Central	841	841	841
Credenhill	1,307	1,580	1,437
Hollington	2,890	3,277	3,084
St Martins and Hinton	389	458	423
St Nicholas	17	17	17
Stoney Street	660	811	735
Three Elms	4,600	5,154	4,864
TOTAL	15,108	17,533	16,257

Table 5-4 (overleaf) shows a more detailed summary of the site information, with dwellings by timescale. This represents the housing trajectory for Hereford urban area, based on identified HELAA sites and windfall. This does not equate to the Herefordshire housing trajectory or 5 year land supply as it does not include sites in the rest of Herefordshire outside Hereford.

Table 5-3: Number of Dwellings and Employment Land by Ward and Timescale (0-15 years)

Parish	Dwellings 0-5 years	Dwellings 6-10 years	Dwellings 11-15 years	TOTAL Housing 0-15 years	TOTAL Housing 15+ years	Land which also has potential for employment / mixed use (Hectares)
Aylestone	125	91	0	216	216	27.7
Backbury	649	1250	0	1899	1899	137.9
Belmont	0	428	0	428	428	48.0
Burghill, Holmer and Lyde	1601	712	0	2313	2313	110.1
Central	192	500	149	841	841	36.1
Credenhill	1337	101	0	1438	1438	102.5
Hollington	517	543	1012	2072	3084	283.1
St Martins and Hinton	18	405	0	423	423	49.7
St Nicholas	0	17	0	17	17	19.5
Stoney Street	328	407	0	735	735	35.9
Three Elms	464	1695	1357	3517	4864	329.8
Tupsley	0	0	0	0	0	41
TOTAL	5,231	6,149	2,518	13,898	16,257	1221.3
Windfall Allowance¹⁶				600		
Total including Windfall				14,498	N/A	

¹⁶ 50 dwellings per annum. A windfall allowance has not been calculated for years 15+

5.7 Housing Trajectory and Risk Assessment

Table represents the housing trajectory for Hereford urban area. This shows that 5,231 dwellings are expected to be delivered in the first 5 years of the plan, in Hereford and adjoining areas. 6,149 dwellings are expected to be delivered in years 6-10 and 2,518 dwellings in years 11-15. There are a further 2,359 dwellings that are expected to be delivered in the 15+ year timeframe.

This trajectory is based on a thorough assessment of the capacity of Hereford urban area and the expected timeframe for delivery of the sites. However, there is an inevitable risk that some of the sites will not come forward as expected and others may come forward that have not been identified. Risks to the trajectory include economic conditions and changing national and local policy which can affect the economic viability of sites and whether they are suitable for development. There are also more local risks, such as the provision of infrastructure including the Hereford relief road and the canal affecting the development potential of sites.

Information on site specific risks has been included in the individual site assessments contained in Volume 2 of this assessment.

5.8 Implications of the results for Hereford

The HELAA results show that there is potential for **14,498** dwellings to be delivered within and adjoining Hereford urban area in the 0-15 year timeframe, including an allowance for windfall sites.

The total amount of land that may also be suitable for economic development or mixed use development is **1221.3ha**. This figure is not exclusively land available for economic development, it represents land that is potentially suitable for either employment or housing.

These figures relate to sites that have been assessed as suitable, available and achievable for housing and / or economic development. These sites represent a large pool of sites from which the Council can draw on when making decisions on which sites to allocate for housing or employment uses. Not all sites will come forward for development in the estimated timeframes, and conversely, other sites that have not been accepted in the HELAA may come forward, for example, if a landowner comes forward with proposals to sell or develop / re-develop a site.

6 MONITORING AND REVIEW

6.1 Monitoring Framework

In preparing Annual Monitoring Reports, it is important that sites at every stage of the development pipeline are considered. This incorporates those sites identified with long term potential in the HELAA, through to their entry into the five years supply of deliverable sites, and to their eventual completion.

Table 6-2 sets out some initial categories that may be useful when establishing a monitoring framework. It should be noted that this is only a suggestion for monitoring and updating the HELAA and that the Council may find it useful to adapt it to better reflect local circumstances.

In order to monitor sites that have been rated as ‘unsuitable’ in this HELAA it is recommended that an annual review of sites in the database is carried out, in the light of any new information that may have come forward. The sites would remain ‘unsuitable’ unless anything has changed, for example a policy change resulting from a local plan review, or a change to circumstances such as new information on flood risk. This would apply to sites that have been discounted in this HELAA.

Information on site availability should also be monitored, and if evidence comes forward of a landowner’s intention to sell or develop a site, this information should be recorded.

Through regular monitoring, and ongoing assessment as to the degree of suitability, availability and achievability of each site, when circumstances do change and housing potential does emerge, response time can be reduced. Therefore, rather than relying on infrequent large-scale land assessments, this method of continuous monitoring ensures there is little or no lag-time between the emergence of potential housing sites, their identification for reporting purposes and their subsequent progress into the planning process.

6.2 Future Monitoring of HELAA sites

The suggested template for future monitoring of sites is the Excel database that has been updated as part of this HELAA and provided to the Council. This database was imported from a Microsoft Access database and formed the basis of the Site Schedules in Volume 2 of this HELAA.

The steps that would need to be taken to monitor sites are:

- For sites that have received planning permission, mark as suitable, available and achievable and move into the 0-5 yr category.
- For new sites that have come forward since the HELAA, as part of a new call for site exercise or through, e.g. pre-application discussions, include as a new category and complete a suitability, availability and achievability assessment based on the best available information. The criteria used in this HELAA should form the basis of this assessment.
- For each site in the HELAA, consider the following:

- Has new information come to light which will change the assessment of suitability, e.g. a change in policy?
- Has new information come to light which will change the assessment of availability, e.g. a landowner expressing a willingness to develop a site, or conversely withdrawing a previous intention to develop?
- If the market situation changes significantly, it is worth considering an update of the viability assessment of the sites? A separate section below sets out the method for updating viability assessments. As with the assessment of suitability and availability, the existing HELAA and GIS database is the simplest and efficient way to update the information.

6.3 Updating viability assessments

An important part of the HELAA process is the viability assessment. The viability of delivery will vary over time, for example, sites that are deliverable now may not be deliverable if house prices were to fall or costs to rise; similarly if a new requirement such as an increase in the environmental standards of new buildings was introduced some sites may no longer be deliverable. As the HELAA is updated over time it will be necessary to update the viability assessment.

The appraisals are designed to allow for relatively quick and easy updating as is appropriate for a broad brush and high level piece of work such as this HELAA. In order to update the Appraisals the main inputs (sales prices, development costs and land prices) should be updated. We recommend that sales prices are updated through market survey of the type described in the report, rather than simply indexed by reference to the published indices (eg Halifax or Land Registry) as there is a mismatch between the prices of new homes and the wider market for existing homes.

The Council will be provided with the Excel based spread sheets holding the viability model used to enable officers to update the findings over time

6.4 Housing Trajectory

Trajectories are a forward planning tool, designed to support the ‘plan, monitor and manage’ approach to housing delivery by monitoring both past and anticipated completions across a period of time. If past completions show a shortfall against requirements they can be used to demonstrate that future completions will make up this shortfall. Alternatively, as they look forwards as well as backwards they can help indicate at an early stage whether any steps need to be taken to ensure planned requirements are met. Trajectories also provide a means of further exploring and understanding the various components of past and future housing supply.

The information contained in a housing trajectory will be necessary to demonstrate what the record of delivery has been against the annualised housing requirement, in order to ascertain what the additional “buffer” will need to be, to satisfy para 47 (bullet point 2) of the National Planning Policy Framework, which requires that local planning authorities

“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the

market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.

Housing trajectories should be regularly reviewed and updated.

Table 6-1: Categories in the Housing Trajectory

Category Ref	Category
A	Past completions – Allocated sites
B	Past completions – Unallocated sites
C	Total past completions
D	Total projected completions
E	Cumulative completions
F	Locally derived housing requirement (annualised)
G	No. dwellings above or below cumulative requirement
H	Annual requirement taking account of past completions

We recommend that the sites in the HELAA are monitored against a range of categories, thus forming a ‘development pipeline’ model. The status of the identified sites would be monitored according to the categories set out in Table 6-2.

Table 6-2: Monitoring Categories

Site types	Category
Sites in the development pipeline	Completed sites
	Sites / units under construction
	Sites granted full consent
	Sites granted outline consent
	Sites where consent has been granted for part of the and area., but part not (or which is currently subject to a planning application)
	Sites subject to planning applications
	Sites where only part of the identified land area is subject to a planning application

	Sites where planning applications have either been refused, withdrawn or are subject to appeal
Sites entering the development pipeline	Sites subject to developer interest
	Other sites allocated for housing with the Local Development Plan
Other identified HELAA sites	Other sites, which comprise the remaining sites identified by the HELAA, as phased in the time periods set out in the local development plan (0-5 years, 6-10 years, 11-15 years).
	Sites identified as broad locations
Sites no longer part of the supply	Identified sites where consent has been granted for uses other than residential and thus where the potential for housing development no longer exists.
	Sites where a landowner has withdrawn their intention to develop

