

Local Plan 2021-2041

**Accommodating Growth & Balanced
Communities Background Paper**

March 2024

Local Plan

Policy Background Paper – Accommodating Growth and Balanced Communities

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1. Introduction

The Regulation 18 Draft Local plan includes consideration of a number of strategic planning issues for the county. The Local Plan is made up of:

- 1) A vision and set of objectives. These set the framework for the strategy and planning policies that will shape the County up to 2041.
- 2) An introduction and strategy section which explains the approach to the distribution of development and identifies core issues that have influenced the strategy.
- 3) Strategic policies that follow on from the vision and objectives as high level policies that will apply to all development, where relevant in the County. These policies address the key issues that the county faces and are prepared under the following headings:
 - Tackling Climate Change
 - Accommodating Growth
 - Balanced Communities
 - Prosperous Economy
 - Healthy Sustainable communities
- 4) Place Shaping policies for Hereford, Bromyard, Kington, Ledbury, Leominster, Ross on Wye and the rural areas.

This background paper provides the background and context to the Accommodating Growth (Policies AG1 – AG6) and Balanced Communities (Policies BC1- BC3) chapters. It explains the evidence that has been used to develop the policies and the relevant guidance and legislation.

2. Background

Herefordshire, along with other Local Planning Authorities (LPA), are assigned a target for the delivery of new homes over a 20 year period. This is calculated by a standard method that takes account of existing housing stock, projection of future demographics, local market conditions and affordability.

The Local Plan covers a number of topics relating to planning that address key issues. A central role of the Local Plan is to determine how the county will deliver new growth over the period 2021-2041. This is done by devising a sustainable strategy for the distribution of the overall growth target. This must be responsive to what needs are identified and where, environmental constraints and access to services and facilities.

In line with national guidance, the Local Plan takes a positive approach to enabling growth, whilst ensuring through policy that it delivers the right sort of housing in the right places. Key to achieving this is identifying locations for the allocation of development sites, and assigning proportionate localised growth targets.

Identifying specific development sites to account for a proportion of the growth targets through policy ensures that the most preferable land is developed first. It also means that the LPA is able to attain the desired range and mix of housing types and tenures, along with contributions to affordable housing stock and specific community infrastructure from these sites.

The siting of these allocations also has a role to play in carbon reduction, by ensuring that they are in well-connected locations that are conducive to reducing the need to travel by car to access services and facilities. With this in mind, the broad spatial strategy is to focus developments to the existing urban areas and key rural service centres, in order to make use of existing infrastructure and services in these places.

Finally, it is important that the spatial strategy contributes to meeting the vision and objectives of the Local Plan as a whole.

3. Policy and legislative context

3.1 Legislation

Planning policy is directed and supported by legislation, generally in the form of Acts of Parliament and statutory instruments. There are too many pieces of legislation related to planning to refer to here but the government's [website](#) includes a list of all the relevant legislation. The following is a selection of key legislation relevant to the issues in this paper.

Levelling up and regeneration Act 2023 (LURA)

The Levelling-up and Regeneration Act 2023 introduces a new planning system based on principles related to beauty, infrastructure, democracy, environment and neighbourhood engagement. The act received royal assent in October 2023 although many elements of the act require secondary legislation to come into force. Of particular relevance to the emerging local plan is the planned introduction of national development management policies (NDMPs) which will sit alongside local plans in decision-making on planning applications. A draft set of NDMPs are expected to be published for consultation in Spring 2024 but were not available at the time of writing. The LURA includes amendments to other relevant legislation.

Town and Country Planning Act 1990

This act provides the legal framework for the town and planning system in England and Wales and defines development requiring planning permission.

Planning and Compulsory Purchase Act 2004

This sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents.

Localism Act (2011)

This introduced neighbourhood plans to give local communities greater power to shape development by having a direct role in the development of planning policies at a local level.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016).

This forms part of the government's agenda to increase the supply of homes through self and custom build. The Act provides a legal definition of self and custom housebuilding and required local planning authorities to establish a register by April 1 2016 and to maintain it thereafter to keep a register of individuals and associations of individuals, who want to acquire serviced building plots in the authority's area.

Housing and Planning Act (2016)

In this Act the Government aims to take forward proposals to build more homes that people can afford, give more people the chance to own their own home, and to improve the way housing is managed. It amends the 2015 Self and Custom House Building Act in relation to requiring local authorities to meet demand for custom built and self-built homes by granting permissions for suitable sites for self-build and custom housebuilding. Part 6 includes a number of relevant issues e.g. neighbourhood planning, local planning, planning obligations

Neighbourhood Planning Act (2017)

The Neighbourhood Planning Act 2017 is intended to strengthen neighbourhood planning by ensuring that planning decision- makers take account of well-advanced neighbourhood development plans and by giving these plans full legal effect at an earlier stage.

3.2 National Policy

[National Planning Policy Framework \(NPPF 2023\)](#)

The NPPF 2023 sets out the government's planning policies for England and how these should be applied in local plans. Local Planning authorities preparing local plans are required to take account of the NPPF. The NPPF describes the purpose of the planning system being to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.

It states that local plan strategic policies should set out an overall strategy for the pattern, scale and design quality of places. This includes making sufficient provision for housing (including affordable housing), to support the Government's objective of significantly boosting the supply of new homes. Local Planning Authorities are required to indicate the broad locations for development on a key diagram and strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. The overall aim should be to meet as much of an area's identified housing need as possible, including an appropriate mix of housing types for the local community.

It also states that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Exceptional circumstances need to be demonstrated if a council does not provide for the amount of housing that the standard method indicates. NPPF also requires the size, type and tenure of housing needed for different groups in the community to be identified and reflected in planning policies. The NPPF also provides the

government's policy on affordable housing provision, requiring local planning authorities to set out the type affordable housing required and it sets out thresholds and details on when and where affordable housing can be required in policies.

Planning Practice Guidance.

The NPPF is supported by more detailed online [Planning Practice Guidance](#) which expands on different topic areas to be addressed by local plans. The following sections are of particular relevance to Accommodating Growth and Balanced Communities:

- [Effective use of Land](#)
- [First Homes](#)
- [Housing needs of different groups](#)
- [Housing for older and disabled people](#)
- [Housing: optional technical standards](#)
- [Housing supply and delivery](#)
- [Rural Housing](#)
- [Self-build and custom housebuilding](#)
- [Viability](#)

3.3 Local policy Herefordshire Local Plan Core Strategy 2011-2031

The Herefordshire Core Strategy was adopted in 2015. The new Local Plan will replace some of the policies in the Core Strategy. Some policies are saved and these are set out in appendix 4 of the draft regulation 18 Local Plan. The draft Regulation 18 plan does not replace or update all the policies of the Core Strategy. This is because a suite of national development management policies introduced by the Levelling Up and Regeneration Act 2023 is expected to be published soon and until those are published the Council cannot confirm which of the existing Core Strategy policies will be replaced by these.

The following policies will be superseded by the policies in the accommodating growth and balanced communities chapters in the new Local Plan (2021 -2041), once adopted.

SS2 Delivering new homes

This sets out the overall requirement for housing between 2011 and 2031 to meet market and affordable housing need. It also sets out the strategy for distribution of housing across the county, encouraging use of previously developed land and provides a target net density range for the county. Draft Policy AG1 replaces this policy by setting out the country wide distribution for housing at a strategic level and also sets out the net requirement for each place and area after considering the number of dwellings that have been built or given planning permission at April 2023.

RA1 Rural Housing Distribution

Policy RA1 sets out the number of new dwellings to be accommodated in the rural areas within the Core Strategy plan period and identified how this will be distributed between the Rural Housing market areas.

This policy will be replaced by Policies AG2 and AG3 of the new local plan. Policy AG2 states that 5,320 new dwellings will be provided in the rural areas, to be focussed in 68 identified settlements.

Policy RA2 Housing in settlements outside Hereford and the market towns.

Policy RA2 identifies settlements that are the main focus of proportional development and other settlements where proportionate housing is appropriate. Policy AG3 refers to the rural settlement hierarchy (RSH) the proportion of the county's development to be accommodated in the rural areas and explains the role of Neighbourhood plans in achieving this. It is supported by Table 4 which explains the different settlement categories of Rural Hubs and Service Settlements. The rural background paper provides more detail about these classifications.

Policy RA 3 Herefordshire's Countryside

Policy RA3 sets out the circumstances where development might be acceptable outside of settlements to avoid promoting unsustainable patterns of development in rural area and avoiding the provision of isolated new homes. Draft Policy AG5 states defines open countryside for the purpose of the new local plan. It does not include criteria for this as it is anticipated that the criteria will be set in the national development management policies.

Policy H1 Affordable Housing – thresholds and targets

Policy H1 sets out the threshold and targets for affordable housing based on the evidence base prepared for the Core Strategy. Draft policy BC2 updates the thresholds and targets based on the most recently produced Housing Area Market Needs Assessment and the Viability Assessment. This identifies Value Zones for the county and the related affordable housing targets for these zones.

Policy H2 Rural Exception sites

This policy sets out the criteria for affordable housing on rural exception sites and the criteria. This policy will be replaced by Policy AG4 which expands on the criteria for exceptions sites and also includes reference to the type of affordable housing (including self and custom build and community led housing) that can be considered for this type of site.

Policy H3 – Ensuring an appropriate range and mix of housing

This policy seeks to ensure mixed developments that will contribute to the creation of balanced and inclusive communities and includes criteria for doing so. This is being replaced by draft policy BC1 which updates the policy to refer to new requirements as well as maintaining a requirement to provide a mix and range as well as identifying particular needs of different groups in the community.

Policy H4 Traveller sites

This policy sets out the criteria for the location of new traveller pitches and plots in the county and refers to a DPD, which was adopted by the council in 2019. Draft policy AG6 of the new plan partially updates this policy and also includes reference to the need to safeguard pitches and plots from other forms of development. The DPD and the Policy H4 will be saved as the DPD includes sites that are still to be delivered.

4 What are the key issues facing Herefordshire?

4.1 Distributing growth in sustainable ways

Herefordshire is a predominantly rural county, which relies significantly upon Hereford city and the county's five market towns for accessing much of its services, educational and economic opportunities. Therefore, Hereford and the market towns offer up the most sustainable locations for new large-scale housing and economic development. Growth of these locations can bolster existing businesses and services, attract investment and reduce the need for residents to travel.

The county's rural areas are home to a diverse range of high-quality landscapes, habitats, historic environments and heritage assets. Settlements vary greatly in size and service provision. The focus of new development within the rural areas should therefore be geared towards the settlements which offer the best key services, and are the least environmentally sensitive.

4.2 Accommodating the level of growth required

Though the optimum sustainable locations available should be selected for growth, the planned uplift in housing in these areas will still inevitably lead to an increased demand and pressure for local employment opportunities, road and transport use, education, and healthcare services.

Hereford and the market towns should therefore be expected to accommodate a proportionate and evidenced amount of employment land expansion alongside the housing growth. Forecasted employment land needs are identified by area in the Employment Land Requirements Study 2022. These could be delivered either as part of planned urban housing expansions (making them mixed use), as standalone exclusively economic land allocations, or across a mixture of both.

It is recognised that new or expanded road capacity will be required, notably in Hereford, Ross-on-Wye in order to absorb increases in traffic that will be generated by the planned residential and economic growth of these areas.

In consultation with education and healthcare providers, identified need for new or expanded schools and healthcare facilities that will arise as a result of the new development will need to be met through developer contributions.

4.3 Housing for different needs

Within Herefordshire there is a need to ensure that there is a supply of properties to suit all households regardless of age, vulnerabilities or financial situation. There are some key issues for Herefordshire that require addressing through the local plan as set out in the following paragraphs in relation to ensuring a supply of a mix of housing for different needs.

The latest [Joint Strategic Needs Assessment](#) (JSNA) for Herefordshire found that overall Herefordshire is a good place to live but there are areas of persistent deprivation in some urban areas and other hidden pockets.

In Herefordshire there is a high proportion of detached houses (40%) compared to England (23%). A high proportion (39%) were built pre 1900 compared to 8% nationally. There is therefore a need to ensure a greater provision of housing of different sizes and types to redress the balance and help with affordability.

The county's population of older persons is increasing, driven by demographic changes including increasing life expectancy. This is a key driver of the need for housing which is capable of meeting the needs of older persons and this should continue to be addressed in the local plan. Herefordshire has a relatively old age structure in terms of older people (that is people aged 65 and over), with 25% of the population being aged 65 and over in 2019. This compares with about 18% regionally and nationally. Furthermore the [HMANA](#) states that Herefordshire is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by 42% over the 21-years to 2041. This compares with overall population growth of 13% and a more modest increase in the Under 65 population of 4%. In total population terms, the projections show an increase in the population aged 65 and over of 20,400 people. This is against a backdrop of an overall increase of 25,900 – population growth of people aged 65 and over therefore accounts for 79% of the total projected population change.

With this growing older population an increase in numbers of the population with mobility problems and with dementia is also expected. Additionally the 2011 Census data, suggests that some 34% of households in the county include someone with a long-term health problem. This figure is slightly lower than that seen across the region but higher than the national average (33% for the whole of England). This information will be updated when the latest census data on this issue is available.

Following on from these statistics, the HMANA identifies a need for around 800 dwellings for wheelchair users that meet the Building Regulations technical standard M4(3). (M4(3) is concerned with wheelchair user dwellings. This requirement is achieved when a new dwelling provides reasonable provisions for a wheel chair user to live in the dwelling and have the ability to use any outdoor space, parking and any communal facilities.) This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing.

There are other groups that may require specialist types of accommodation to cater for specific requirements e.g. students and children where the council is the corporate parent. However further currently unidentified specialist requirements may arise over the course of the plan period

and therefore there is a need for the policy wording to be flexible to address these if they should arise.

4.4 Affordable housing

Herefordshire is one of the most unaffordable counties in England for home ownership. The [HMANA](#) 2021 demonstrates that there is a notable need for affordable housing in the county and this is a pressing issue. The draft local plan policies seek to increase the amount of new affordable housing delivered in the county by focusing development in areas where the greatest amount of affordable housing can be achieved. Policy BC2 which sets out the requirements and thresholds for affordable housing in association with new development. The approach taken to affordable housing has been informed by a viability assessment

Affordable housing in Herefordshire is housing provided at below market prices and which is allocated on the basis of need to people who are unable to purchase or rent houses generally available on the open market without financial assistance, as their only home. To be eligible for affordable housing, certain criteria have to be met including living or working in Herefordshire or need needing to move to the county to receive or provide support. Recipients of affordable housing in Herefordshire include:

- First time buyers who cannot afford to purchase on the open market
- Families who need larger accommodation and cannot afford to rent or buy a suitable property on the open market
- Households who need properties that are adapted to meet their individual needs
- Households with support needs including people with learning disabilities, physical and/or mental health needs, people who are at risk of or have experienced abuse.

Affordable housing can be delivered by developers, registered providers and community land trusts. It is important that the tenures of affordable housing meet the particular requirements of the county.

There are different types of affordable housing provision. These include First Homes which are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

In Herefordshire, the priority is the delivery of affordable rented housing at social rent levels to provide homes for low income working households in particular. Social rent is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act). These rents are in line with guideline target rents which are determined through the government's rent policy. The HMANA 2021 evidence justifies maintaining this approach in the Local Plan update.

The HMANA recommends that the amount of affordable housing required through policy should be informed by a separate viability assessment and such an assessment has taken place. The viability of affordable housing across the county varies as set out in section 6.3.6.

4.5 Custom and Self Build

National Planning Practice Guidance describes self-build and custom housebuilding as covering a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation ('turnkey'). As stated above the legislative framework for this type of housing is set out in the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016 and the Levelling Up and Regeneration Act 2023). This provides a legal definition of self-build and custom housebuilding. The Act does not distinguish between self-build and custom housebuilding and provides that both are where an individual, an association of individuals, or persons working with or for individuals or associations of individuals, build or complete houses to be occupied as homes by those individuals.

Herefordshire Council has had a self and custom build register in place since April 2016 as required by the Custom and Self Build Housing Act 2015. At the end of the eighth base period (the term used by the legislation for the reporting periods) there are 748 individuals entered on the register and 3 associations. This is considered to be a relatively high level of interest in the county compared to some other areas of the country. Broadly speaking, the Council is required to grant sufficient planning permissions, within a set time period, to meet the demand of the overall numbers expressed in single base periods. There is no requirement for the council to meet the requirements of individuals who have entered their details on the register.

Self and custom build homes can be undertaken by local community groups as well as individuals. The legislation refers to "associations" as being eligible to join the self and custom build register if they are interested in a group build. To date there are only 3 associations that have joined the register, the majority being interested in individual build projects. However there is potential for self and custom build to come forward as co-operatives or co-ownerships or through community land trusts as community led housing.

Community groups may have a common purpose and wider community objectives or may simply provide a means for individuals to build/commission their own home. Housing associations, community-led housing groups and specialist organisations can also bring forward affordable self and custom build housing schemes

The council reports on the demand on the register and how it meets this demand this as part of its [Annual Monitoring](#). The Council believes that it is broadly meeting the overall demand although there have been some shortfalls in recent years. According to the published AMR reports a significant proportion of self and custom build is coming forward as single properties often in rural locations. There is therefore an opportunity to broaden out the location and type of self and custom build in the county to meet the requirements of a greater range of incomes and ages.

Self and custom build has a number of advantages including:

- Provides people with more choice and flexibility
- It can be a more affordable and cost effective means of securing a home particularly when people get involved in some of the building work themselves.
- Results in a home that is suited to the owners' needs and requirements.
- Can result in more innovative individual design
- Encourages more small and medium sized house builders who can play significant role in delivery of some schemes.

4.6 Nutrient Management

A major constraint to the delivery of new development in recent years has been surrounding the management of river nutrients. Herefordshire Council as the 'competent authority' under the Habitats Regulations, (The Conservation of Habitats and Species Regulations 2017) is legally required to assess the potential impacts of projects and plans, on internationally important sites which include the River Wye Special Area of Conservation (SAC). Elevated levels of phosphates in the River Lugg catchment of the SAC have meant that any developments that could release additional phosphates into the River Lugg have been prevented from being approved. To address this issue, the River Wye Nutrient Management Plan (NMP) was reviewed, and a series of actions have been introduced to provide sufficient certainty that new residential development will be nutrient neutral or will provide betterment. There are plans for the creation of a series of integrated wetlands in the Lugg catchment area, one of which has now been completed, allowing for developments to start being approved.

4.7 Gypsy, Traveller and Travelling Showpeople Accommodation

There has been a travelling community in Herefordshire for the last 500 years. Travellers live in different ways, including permanently 'on the road', in caravans or mobile homes, or in settled accommodation (for part or all of the year). In Herefordshire there are a number of small privately owned traveller sites and larger sites that are managed by Herefordshire Council and a number of generally small privately owned sites. There are also privately owned Travelling Showpeople yards in the county which provide both living accommodation and storage space for equipment.

In the same way that the local plan makes provision for housing as outlined in Policy AG1, local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling show people. These targets must address the likely permanent and transit site accommodation needs of travellers in Herefordshire over the plan period. It is important to ensure that there is an adequate supply of pitches and plots for all groups of travellers on authorised sites in the county. Without adequate provision, it is difficult for traveller families to access basic health care, support and education services.

A Gypsy and Traveller Accommodation Assessment (GTAA) was published in 2022. This sets out the requirements for Gypsy, Traveller and Travelling Show People accommodation up to 2041. It assesses the requirements both for gypsy and traveller pitches as well as plots for travelling show people. The assessment included an online survey and telephone interviews with key stakeholders providing qualitative data regarding the accommodation needs of Gypsies, Travellers, and Show people as well as extensive face-to-face surveys of Gypsies, Travellers and Travelling Show people, covering a range of issues related to accommodation and service needs took place in February 2022. This key methodology determined an extensive range of data enabling accommodation needs to be determined. The GTAA identified the following requirements for pitches and plots:

Requirement for residential Gypsy and Traveller pitches and Travelling Showpeople Plots:

Time period	Number of residential traveller pitches required:	Number of travelling show people plots required:
2021-26	14	6
2026-31	8	1
2031 -36	9	1
2036-41	10	1
Total 2021-41	41	9

Source [GTAA 2022](#)

However, historically it is difficult to allocate sites at the planning policy stage as although the council has run call for sites processes for travellers, very little is submitted for assessment. It appears that most sites come forward at the planning application stage rather than the local plan stage. Opportunities for the expansion or intensification of the council owned or managed sites, in addition to those allocated in the DPD have been exhausted. However the council continues to invite suggestions for traveller sites at the plan progresses through to its next stages.

There are no formal authorised stopping places in the County. This can result in unauthorised encampments in various locations from time to time. The Council records all data about encampments including location, length of stay and number of vehicles. This data was used in the preparation of the GTAA to inform the need for transit sites or temporary stopping places. The adopted DPD allocates a site for a temporary stopping place adjacent to the A49 at Leominster but this has not yet been delivered but this allocation has been saved. In relation to transit provision, the GTAA recommends that the council sets up negotiated stopping places policy to address transit provision. This is land temporarily used as authorised short-term (less than 28 days) stopping places. They may not require planning permission if they are in use for fewer than 28 days in a year. The Council will continue to explore options for this as the plan progresses.

5 Local Plan 2021-2041

5.1 Spatial Options

A six week public consultation on a set of spatial options for the county was undertaken from 17th January to 28th February 2022. The most favoured option in the responses for distribution of growth was to focus it across Hereford and the market towns.

For growth in rural areas, most favoured was growth focussed away from settlements in National Landscapes and Conservation Areas, followed closely by focussing development on the larger settlements.

5.2 Policy Options

A six week public consultation on a set of policy options for the Local Plan was undertaken from 4th April to 16th May 2022. Notably, in the responses there was support for lowering affordable housing requirement thresholds in rural areas, ensuring that policy reflected possible future designation of these parishes as a “rural area” in national policy terms- meaning that these lower thresholds can be set in conformity with national policy.

Strong support was shown for requiring a more prescriptive mix and range of housing, and for a specialist housing policy covering the needs of students and older persons care. With regards to Gypsy and Traveller provision, respondents were most in favour of retaining the existing policies and undeveloped site allocations in the adopted Traveller Development Plan Document (DPD).

There was no clear preference between retaining the existing Core Strategy approach to housing growth in rural areas and changing it. A majority wished to see Neighbourhood Development Plans retain their role in rural housing delivery.

5.3 Place-shaping Options

A six week public consultation on a set of place-based options for the Local Plan was undertaken from 13th June to 29th July 2022. This focussed more closely on development options within the areas of Hereford and the five market towns. The responses to it are summarised as follows:

- Hereford- the most preferred overall locations were to the north, west and the city centre.
- Bromyard- the north and west of Bromyard (Option 1) were preferred locations for development over the south (Option 2)
- Kington- less disparity in preference between the options presented, with a marginal preference shown for “Area 4- Land North of the Medical Centre”
- Ledbury- “Area 1- Lawnside and Market Street Regeneration Area” was the most preferred strategic site
- Leominster- “Option 1” was the clear favoured choice, which included retention of the Southern Urban Expansion from the Core Strategy, supplemented by other smaller housing sites.

- Ross-on-Wye- there was a clear preference for “Area 4- Brownfield Land”, with land to the south and south west least preferred.

5.4 Evidence base

A number of topic based assessments and background studies have been produced to provide evidence for the policies and proposals in the Local Plan. A full list of the documents can be found on the [Evidence Base](#) webpages. Some of these studies are ongoing in nature and these pages will be updated as the plan progresses towards examination. Evidence base studies completed to date have informed the Regulation 18 consultation draft. Those that are relevant to the Accommodating Growth and Balanced Communities policies are listed below:

[Employment Land Requirements Study \(ELRS\) 2022](#)

The Employment Land Requirements Study was produced for Herefordshire Council by BE Group and was published in 2022. It uses economic forecasting and surveying of businesses in the county to identify what the likely requirements will be for new employment land over the Local Plan period. It sets out two potential distributions for employment land across Hereford and the market towns based on higher and lower allocations. These are referred to as the optimistic scenario and the moderate scenario respectively.

[Housing Market Area Needs Assessment 2021](#)

The Housing Market Area Needs Assessment covers the period 2020 to 2041 and provides a robust evidence base regarding the need for housing for each of the seven housing market areas across Herefordshire.

[Herefordshire Gypsy and Travellers' Accommodation Assessment \(GTAA\) April 2022](#)

The Gypsy and Traveller Accommodation Assessment is to inform the emerging Local Plan policies and allocations. The research provides information about the current and future accommodation needs and demands of Gypsies and Travellers and Travelling Showpeople in the county over the plan period.

[Self and Custom Housebuilding Study Technical Report July 2023](#)

This report provides an independent assessment of local demand for Self-Build and Custom Housebuilding (SBCH) in Herefordshire over the new local plan period. The findings of this report has informed the percentage threshold requirements in Policy BC3.

[Strategic Flood Risk Assessment Level 1](#)

The Strategic Flood Risk Assessment assesses the levels of flooding within the county. It has informed the Local Plan by identifying flood risk areas at a county wide level. A more detailed flood risk assessment of the strategic sites is being prepared and the findings of which will be used to inform the next stage of the plan.

Water Cycle Study

The Water Cycle Study is currently being produced. Its aim is to determine how much water can be extracted in each area, under various potential local development scenarios, without causing environmental harm. It can also propose solutions if or where any potential issues are identified. At the time of writing, this evidence is not yet available.

Viability Assessment March 2024

This is a whole plan viability assessment. It considers the individual policy requirements and the potential for development to fund infrastructure. There are a number of policies in the draft Local Plan that have viability implications, including the provision of affordable housing, higher future building standards, provision of custom and self-build, nutrient neutrality and biodiversity. The findings of this viability assessment have influenced both the housing accommodation strategy and the individual requirements.

5.5 Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA)

A Sustainability Appraisal (SA) is a statutory requirement of the Planning and Compulsory Purchase Act 2004 and is mandatory for Development Plan Documents. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA was commissioned for the Draft Herefordshire Local Plan Regulation 18 consultation stage.

The SA concluded that policy AG1: Accommodating Growth would have a significant positive effect on the following SA Objectives:

- 2 (housing) as the policy sets a target of 16,100 new homes over the plan period to meet the need for both market and affordable housing.

A minor positive effect is likely in relation to SA Objectives:

- 1 (climate change), 6 (physical and mental health and wellbeing), and 10 (air quality) as the policy seeks to facilitate the use of sustainable travel options through the location and density of development.
- 4 (town and retail centres) The scale of development proposed for Hereford and the market towns is expected to increase footfall in the respective centres, helping to support businesses there.
- 5 (access to services, facilities and education) and 9 (travel) as development will be mainly focussed at locations which are considered to be the most sustainable, including considering their range of services and infrastructure.

Mixed or uncertain effects are expected in relation to SA Objectives:

- 12 (landscapes and townscapes) and 13 (heritage) as development will be focussed away from environmentally constrained areas such as National Landscapes and Conservation Areas. However, the overall scale of development being proposed means that some negative effects are nonetheless likely. This does remain uncertain as much will depend on designs, scales and layouts of the developments.

- 15 (resources) as the scale of development will inevitably result in resource consumption and the loss of previously undeveloped land (greenfield) land. The policy does however also promote brownfield land development where this is possible.

Significant negative effects are identified for the following SA Objectives:

- 11 (biodiversity and geodiversity) as a result of the loss of greenfield land.
- 14A (flood risk) as a result of the loss of water storage arising from the loss of greenfield land.

The SA concluded that policy AG2: Strategic rural housing distribution would have a significant positive effect on the following SA Objectives:

- 2 (housing) as the policy provides for 5320 new dwellings in the rural areas, meeting need outside of Hereford and the market towns.

Mixed effects are identified for the following SA Objectives:

- 5 (access to services, facilities and education) as housing in rural areas is generally less likely to well-positioned for accessing services and facilities. However, development in these areas can also stimulate new provision or bolster existing services and facilities.

Minor negative effects are expected for the following SA Objectives:

- 15 (resources) as the scale of growth will inevitably result in resource consumption and the loss of previously undeveloped land (greenfield) land.
- 11 (biodiversity and geodiversity), 12 (landscapes and townscapes), and 13 (heritage) for similar reasons as above.
- 9 (travel) and 10 (air quality) as development in rural areas is likely to lead to more private car use with residents more likely needing to travel to access jobs, education or services/facilities. In the short term with internal combustion engine cars this will likely impact upon air quality.

The SA concluded that policy AG3: Rural housing growth in Hubs and Service Settlements would deliver significant positive effects in relation to the following SA Objectives:

- 2 (housing) as the policy states that Neighbourhood Development Plans (NDPs) will allocate land for new housing using indicative growth targets, which provides some additional certainty around delivery of rural housing.

Minor positive effects are identified for the following SA objectives:

- 1 (climate change), 6 (physical and mental health and wellbeing), 9 (travel), 10 (air quality) as new development will be located in accordance with the county's settlement hierarchy, reducing the need to travel. This will likely lead to a reduction in carbon emissions.
- 5 (access to services, facilities and education) as the policy promotes community based services and facilities as part of new development. Locating development in accordance with the settlement hierarchy will ensure that more people have reasonable access to services and will bolster existing services.
- 12 (landscapes and townscapes) as the policy requires any rural development proposals outside of NDP areas to be within or adjacent to the existing settlement.

The SA concluded that policy AG4: Rural settlement exceptions for affordable housing, entry level homes, self and custom build housing and community led housing would deliver minor positive effects in relation to the following SA Objectives:

- 2 (housing) as the policy sets specific criteria for identifying appropriate sites for development in NDP areas outside the settlement hierarchy, which though restrictive does offer increased scope for housing delivery.
- 1 (climate change), 5 (access to services, facilities and education), 6 (physical and mental health), 9 (travel) and 10 (air quality) as the policy specifies that sites must be located no more than 1km from at least three key services facilities. This promotes sustainable travel options which could encourage a modal shift from the private car, reducing carbon emissions.

A minor negative effect is identified in relation to the following SA Objectives:

- 14A (flood risk) as though the policy states sites should not be “wholly” within flood zone 3 and avoiding areas where the settlement road suffers from flooding. Whilst this offers a degree of protection, development on or adjacent to flood zone 3 is likely to increase flooding risk.

Negligible impacts are expected on the following SA Objectives:

- 14B (water quality and quantity) as any development across the county will place pressure on the quality of the county’s water courses, but the scale of developments coming forward under this policy is relatively small.

The SA concluded that policy AG5: Open countryside would have a minor positive effect on the following SA Objectives:

- 11 (biodiversity and geodiversity) as the policy seeks to protect undeveloped rural land from development.
- 12 (landscape and townscapes) as any area outside of a settlement boundary or built form is classified by the policy as “open countryside”, affording greater protection to the countryside from development.

The SA concluded that policy AG6: Gypsies, Travellers and Travelling Show People would have a significant positive effect on the following SA Objectives:

- 2 (housing) as the policy seeks to safeguard existing accommodation and supports new proposals for gypsy/traveller/travelling show people accommodation in line with identified needs in the 2022 GTAA.

The SA concluded that policy BC1: Housing mix and range would lead to a significant positive effect in relation to the following SA Objectives:

- 2 (housing) as the policy seeks to ensure that housing developments provide a mix and range of housing types to provide for a range of household sizes and incomes to meet identified housing needs across the county.

Minor positive effects are identified for the following SA Objectives:

- 3 (community cohesion and safety) because the policy refers to the creation of balanced and inclusive communities.
- 5 (access to services, facilities and education) as the policy refers specifically to meeting the housing needs of students, benefitting higher education in the county.
- 6 (physical and mental health and wellbeing) as the policy states that the design of all homes must accord with Healthy Homes Principles. It also considers the requirement to respond to the need for specialist accommodation for older people and those with additional care needs.

The SA concluded that policy BC2: Affordable housing- thresholds and targets would result in a significant positive effect on the following SA Objectives:

- 2 (housing) as the overall purpose of the policy is to promote the provision of affordable housing as part of open market schemes, meeting identified needs.

Minor positive effects are expected in relation to the following SA Objectives:

- 3 (community cohesion and safety) as the provision of affordable housing will help with retaining the younger population in need of affordable housing in the area.

Negligible effects are identified for the following SA Objectives:

- 12 (landscapes and townscapes) as the policy distinguishes different trigger points for affordable housing requirements in National Landscapes and designated rural areas (5 dwellings), which does provide a benefit to these high cost areas. However the scale is unlikely to adversely affect the qualities underpinning the designation.

The SA concluded that policy BC3: Diversity of housing delivery would have a significant positive effect on the following SA Objectives:

- 2 (housing) as the policy supports a greater diversity of ways of delivering housing, including self and custom build and community led housing.

Minor positive effects are identified for the following SA Objectives:

- 1 (climate change), 8 (employment and reducing inequality and poverty), 11 (biodiversity and geodiversity) because the policy could support the development of small scale employment units, renewable energy schemes and open space in standalone sites or as part of a larger housing scheme where opportunities exist.
- 3 (community cohesion and safety) since delivering a mix of housing will meet the needs of a community and retain residents in the area.

The Habitats Regulations Assessment (HRA) screening concluded that “no significant effect” is predicated upon European designated sites by the following policies, as they do not result directly in development:

- AG3: Rural housing growth in Hubs and Service Settlements
- AG5: Open countryside
- BC1: Housing Mix and Range
- BC2: Affordable housing- thresholds and targets
- BC3: Diversity housing delivery

“Likely significant effects possible” are identified for the following policies:

- AG1: Accommodating Housing Growth
- AG2: Strategic rural housing distribution
- AG4: Rural settlement exceptions for affordable housing, entry level homes, affordable, self and custom build housing and community led housing
- AG6: Gypsies, Travellers and Travelling Show People

6 Preferred policy direction

6.1 What can the Local Plan achieve?

In terms of housing policies, the Local Plan seeks to meet housing requirements by identifying suitable strategic allocations for housing and employment. It seeks to maximise the amount of affordable housing in the county through locational distribution as informed by the viability study as well as increasing the way all housing is delivered by including policies that encourage more self and custom build housing and community led housing.

In terms of locating the development, consideration has been given to a range of opportunities for, and constraints to, developments. The aim has been to strive for the most sustainable locations where people can have the greatest access to services and facilities whilst taking into account many other factors for example landscape impact and accessibility. There are no easy options in terms of site allocations and therefore it is impossible to find sites that can be developed without any impact. It is important that these issues are carefully mitigated and therefore each of the place shaping policies includes the relevant mitigation that will be required as part of the development to reduce any identified impacts and to achieve high quality environments for people to live in. Furthermore evidence is still being collected to provide further information about the suitability of development in certain locations and this will continue to feed into the local plan as it proceeds towards the submission and examination stages.

6.2 Vision & objectives

The Vision sets the overall framework for the Accommodating Growth and Balanced Communities sections of the plan. The Vision is made up of three pillars as follows:

The Environment pillar states:

Herefordshire will be carbon neutral, and nature rich. The county’s distinctive landscapes, cultural heritage and natural environment will be protected and enhanced for the benefit of people and wildlife. The county’s residents’ quality of life will be enhanced by ensuring they are able to live in more environmentally sustainable ways.

The Community ‘pillar of the plan’s vision states:

The county will have resilient, well connected communities where new development is beautifully designed and inclusive. The health and wellbeing of the county’s residents will be enhanced by

everyone having the opportunity to live in a decent home with access to community facilities and services.

The Environment pillar states that:

Herefordshire will be prosperous, with a diverse and sustainable economy. The county’s farming heritage and sustainable tourism sectors will continue to play an important role in the rural economy. Hereford and the market towns will be thriving centres and popular places to live, work and visit. Hereford will be recognised as a centre for education as well as a place where innovative businesses can invest and thrive.

The objectives

The vision is refined into a number of objectives for each pillar. The following are those that are the most relevant to the Accommodating Growth and Balanced Communities policies.

Objective Number	Objective
1	To ensure that development requires significantly less energy use and to increase the amount of energy generated from renewable sources, with a requirement for all new developments to be carbon neutral.
2	To protect communities from the worst impacts and dangers of climate change, including from flooding and heat stress.
6	To ensure high quality and sustainable design of buildings and spaces taking into account local character and protecting local heritage assets and their settings.
10	To provide inclusive connectivity, development and infrastructure for all.
11	To ensure that all new development supports the health and wellbeing of its occupants in accordance with the Healthy Home Principles.
12	To ensure that all residents are well connected to nearby services and facilities for daily requirements
16	To ensure residents feel safe in Herefordshire from crime and climate change events.
22	To ensure that all new development is accompanied by fast and reliable digital connectivity

6.3 Which policies will address the issues identified and how?

6.3.1 Growth Policies

Draft Policy AG1 sets out how the county-wide new homes target will be divided between Hereford, the market towns and the rural areas. This responds to the preferred spatial distribution indicated in the spatial options public consultation in 2022, and broadly reflective of the identified needs in the Housing Market Needs Assessment (HMANA).

The policy does include housing figures for the plan period from April 2021 that are already accounted for and deducted this from the headline target figure. This is composed of sites that have already been built out, under construction or have an extant planning permission. This is a snapshot in time and will be reviewed with each iteration of the Local Plan.

A number of the large site allocations in Hereford and the market towns from the Core Strategy have not come forward, therefore it is important that such sites chosen to deliver on these targets have assurances that they are deliverable in the plan period, and that infrastructure is able to accommodate the levels of development proposed. This is of particular importance with sites that have been carried over as allocations from the Core Strategy, where a principle of development is established, but are yet to be delivered.

The growth levels apportioned to each of the market towns must also take into account various factors, including environmental constraints, levels of service provision, economic activity, transport links and past delivery rates.

6.3.2 Rural Growth Policies

Draft Policy AG2 drills down into further detail the distribution strategy for the rural apportionment of growth, as this makes up a significant proportion of the target and it is important that this is distributed in a coordinated and sustainable way over what is a vast area.

Draft Policy AG3 goes into further detail the about the distribution strategy for the rural apportionment of growth, as this makes up a significant proportion of the target and it is important that this is distributed in a coordinated and sustainable way over what is a vast area. The proposed rural settlement hierarchy represents a significant departure from the approach taken in the Core Strategy, focussing the growth across a far larger number of settlements that enjoy higher levels of service provision, as opposed to the dispersed approach across many currently taken.

As well as service provision, the environmental sensitivity of many of Herefordshire's rural areas must be taken into account when selecting settlements for growth. This is therefore acknowledged for selected settlements in the new hierarchy where these are within or adjacent to conservation areas or National Landscapes, with growth levels reduced accordingly.

The policy aims to build on the success of NDPs in allocating and delivering site allocations by continuing to utilise them as the principal mechanism for delivering on the targets set for rural parishes.

Draft policy AG4 expands the scope for delivering vital affordable housing to the county's rural areas, by allowing flexibility for sites to come forward in areas outside of the settlement hierarchy, albeit in appropriate locations in terms of reasonable access to services. It also seeks to utilise a more diverse range of available mechanisms for affordable housing delivery, such as entry-level homes, self and custom build and community led housing schemes. This aims to increase the diversity of housing stock and allow for the county's rural areas to retain more of its younger population.

Draft policy AG5 effectively echoes the Core Strategy policy RA3 by defining what is classified as open countryside in the county in planning terms, providing clarity on where rural housing development will be acceptable in policy terms, or subject to exception criteria. With the change in

settlement hierarchy, a number of areas not defined as such in the Core Strategy would now be classed as open countryside under this policy.

6.3.3 Gypsy and Traveller Policies

Draft Policy AG6 provides the draft policy for Gypsies, Travellers and Travelling Show people. This refers to meeting the need for this type of housing that is set out in the most up to date [Gypsy and Traveller Accommodation Assessment](#) (GTAA).

There appears to be limited availability of sites that are suitable for this type of development and to meet the specified requirements set out in the GTAA. Therefore it is very important to ensure that existing authorised sites for gypsies, travellers and travelling shop people are retained as such and are not lost to other forms of development. Therefore the requirement to safeguard existing sites is included in the policy. In 2019 the Council adopted a [Travellers Sites DPD](#). This DPD includes a number of allocations for residential pitches and also a site for temporary stopping. Not all of these sites have been delivered and therefore it is important the DPD is saved to ensure that these sites come forward. The safeguarding element of Policy AG6 also applies to site allocations as well as existing sites to ensure that opportunities for sites are not lost and that a range of sites exist, current authorised sites with permanent planning permission will be safeguarded. Sites allocated in the DPD will also be safeguarded unless there are exceptional circumstances as to why a site cannot come forward and in this case, alternative provisions should be made for the same number of pitches elsewhere to ensure no net loss of future provision. Any other non-allocated sites that receive permanent permission in the future will also be safeguarded.

6.3.4 Balanced Communities Policies

There are three policies in this section of the plan as described below. The general purpose of these policies in combination is to ensure that the correct mix and range of housing is provided across the county to ensure that there is housing available to meet all needs and requirements. It addresses specialist needs for housing that are likely to increase or arise over the plan period. The provision of affordable housing is seen as a key strategic aim of the local plan but this has to be balanced with the viability of a development to ensure that strategic allocations are deliverable.

The way that housing is delivered is changing and is likely to continue to do so over the plan period. Therefore the policies provide greater scope to encourage more self and custom build housing as a more cost effective means of obtaining a home with more choice about the design and layout of home to suit particular requirements. The 2023 NPPF encourages more community led housing and identifies this as housing type that can be acceptable on rural exception sites. The contribution that community led housing can make to affordable housing and as a means of providing people with more choice about the type of housing and way of living is recognised and therefore this policy supports this.

6.3.5 Policy BC1 – Housing Mix and Range.

This policy aims to ensure the delivery of housing that will meet the needs of all sectors of the community. It is important that there is a choice of housing types and sizes for people to choose from and that are suitable for different circumstances and budgets. This may range from bungalows that may be more suitable for older households or people with mobility restrictions to larger family homes arranged over 3 floors for example.

Core strategy policy H3 includes a threshold of sites with more than 50 dwellings where a requirement for specialist housing is introduced. However BC1 currently does not include such a threshold. However this is something that will be considered as part of the consultation process and it may be that a threshold is introduced in the next iteration of the plan.

This policy also introduces the requirement to comply with a number of standards as it is important that all new homes are built to a high quality, and are accessible. The Government introduced new [technical standards](#) for housing in 2015. The purpose of these national standards was to bring some conformity to this issue across the county but individual Local Planning Authorities are required to adopt them individually if they want to apply these standards when determining planning applications. The NPPF 2023 states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. The [HMANA](#) identifies such a need with notable growth in the population of older persons aged 65+ in Herefordshire expected over the period to 2041. Additionally a growing older population is expected to result in increased numbers of the population with mobility problems by 4,800 to 2041 and with dementia by 2,170. The HMANA states therefore that Herefordshire Council would therefore be justified through policy in requiring new homes to be delivered as 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations. Furthermore the Government has stated in its response (July 2022) to its [consultation on raising accessibility standards of new homes](#), that it proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes subject to a further consultation on the draft technical details

The HMANA states therefore that Herefordshire Council would therefore be justified through policy in requiring new homes to be delivered as 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations. Furthermore the Government has stated in its response (July 2022) to its consultation on raising accessibility standards of new homes, that it proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes subject to a further consultation on the draft technical details

In addition, the HMANA identifies a need for around 800 dwellings for wheelchair users, meeting technical standard M4(3) is identified. This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Policy BC1 requires 5% of all new homes to be wheelchair accessible. This would be achievable based on the gross housing requirement of 16,100 new homes. However as over 6000 of these have either been built or have planning permission it is likely that the percentage requirement for this will have to be increased at a later stage and be subject to further viability testing.

The Government's optional standards also states that planning policies may also make use of the nationally described space standard, where the need for an internal space standard. These were not included in the Core Strategy as their publication coincided with the late stage of the

examination process and there was no evidence to support their adoption. However since the adoption of the plan, there has been a decrease in some of the quality of the proposals for living accommodation e.g. proposals for new dwellings with inadequate internal and storage space and often incorporating inadequate natural light. Therefore the council is keen to ensure that all new housing is built to acceptable standards where people are able to enjoy a good quality living environment. The government requires local planning authority to consider any implications for viability before they adopt these standards. Consequently as part of preparing the new local plan the adoption of the space standards has been subject to viability testing based on the standard typologies and the allocations' market dwelling meeting at least minimum requirements set out in the Nationally Described Space Standards (NDSS). Including this requirement did not present any major issues for viability of the plan.

6.3.6 BC2 – Affordable Housing

Rural Designated Areas

The first part of the policy sets out the thresholds for when affordable housing can be sought from new developments. Policy BC2 introduces a new lower threshold for certain parts of the County that are designated as either a designated rural area or are within the National Landscapes (formerly known as AONBs). Development opportunities within rural areas tend to be smaller, lower density sites. In 2021/2022, as an example, 60% of all rural housing commitment sites were under 10 units and 76% of all rural housing completions were on sites of under 10 units. This means in the absence of a formal 'rural area' designation, national planning policy does not allow affordable housing contributions to be sought on any of these sites. This has a significant impact on the ability of the Council to respond to affordable housing need across our rural communities. Despite the rural nature of the county, it has never been formally designated 'a rural area', which is a factor within the planning system which is utilised to determine the threshold for affordable housing planning policy. Recent consultation on the emerging Local Plan and work on producing our significant number of neighbourhood development plans demonstrate that communities are in favour of lowering affordable housing thresholds. This will give more flexibility in Herefordshire's villages and communities to provide a range and mix of housing tenures that are needed whilst not forcing these communities to accept larger housing development than feel appropriate to their community setting.

The 'rural' designation is made at parish level and following careful assessment of the nature of the county's parishes, the Council has applied to the Secretary of State for Levelling Up, Housing and Communities to designate 220 parishes as a 'rural area' which will enable the Council to achieve lower affordable housing thresholds through our emerging planning policies/ National planning policy stipulates thresholds for affordable housing requirements and these are reflected in point 2 of the policy. That is where there are sites of more than 10 dwellings or a site is larger than 0.5 hectares.

Affordable housing thresholds

As already stated there is a pressing need for affordable housing in the county but when considering target level, local planning authorities are required to assess how viability issues in the county are likely to impact on those targets. Therefore the council has undertaken a viability assessment of the local plan policies and the findings of that report can be found on the local plan evidence base [web page](#). This viability assessment is critical to the local plan as it is essential that local planning authorities set realistic targets for affordable housing to ensure that the

required amounts of both affordable and market housing can be delivered in the county. The findings of the viability assessment, which will be updated as the plan progresses, will be a key consideration for the examination stage of the local plan.

The viability assessment identifies value zones for the county and associated affordable housing targets for these value zones. The overall conclusions from the viability testing is that the majority of residential development tested is viable and that in viability terms, the policies proposed in the new local plan do not put delivery at risk. However, in relation specifically to affordable housing policy the report recommends that affordable housing policy should be set at 35% in Hereford, Ledbury, Bromyard, Ross-on-Wye and the rural areas but reduced to 15% in Kington and Leominster. The strategic allocations in Hereford, Ledbury and Ross-on-Wye are also viable at 35% affordable housing but in Kington and Leominster the affordable housing for the allocations should be lower and alternative affordable housing delivery mechanisms considered.

6.3.7 BC3 Diversity of Housing Delivery

As stated earlier the Herefordshire self-build and custom housebuilding register provides the council with information about the level of interest in self and custom build within the county. The register includes a number of questions of those registering their details some of which are compulsory as set out in the legislation but there are also a number of optional questions, for example asking for more information about the type and location of plots for self and custom build that are being sought. Optional questions are also posed about available income and the size of property desired as well as reasons for wanting to self or custom build. This allows the council to build up a profile of the register and helps us to formulate the policy direction. However, there is also an opportunity to broaden out the opportunity for self and custom build to be made available for a broader range of budgets and different circumstances.

Therefore the Council is seeking to increase the diversity of housing supply through BC3 which sets out a threshold for requiring self and custom build plots on sites of 20 or more dwellings. This threshold has been informed by a [Self and Custom Housebuilding Study Technical Report July 2023](#) and has also been considered as part of the viability assessment of the draft local plan. The threshold approach is considered to be an effective way to increase the mix and choice of housing types and tenures, and can have the potential to increase the delivery of innovative and highly sustainable developments in a cost effective manner.

The Self and Custom Housebuilding study technical report concluded that that the potential demand for self and custom build housing over the plan period is likely to be greater than the evidence from the register would suggest. The report estimates an annual demand for 114 SBCH plots per year (years 1-5) against an average supply of 70 plots per year. This means that there is potentially a demand for 44 additional plots in the next 5 year period. The report also concludes that this could increase to 48 plots per annum for years 6-10 and 52 plots in years 11-17.

Policy BC2 recognises that Self-build and custom housebuilding is a growing sector of the housing market, and one which has significant potential to contribute to housing delivery in the county. In addition to the increase in self and custom build housing that is likely to result from the implementation of this policy, it is also expected that single plots will continue to be delivered through individual planning applications as opportunities arise.

Policy BC2 also supports community led housing as a means of delivering housing and facilitating the opening up of housing opportunities to a wider range of people who are unable to find a home they can afford or that meets their needs. Community led developments often attract high levels of support because they are locally led and responsive to the needs of the community. They often

open up opportunities for housing for a wide range of people who may be unable to afford a home that meets their requirements. They are suitable for both urban and village settings and can provide housing that meets specific housing needs such as groups wishing to provide mutual self-support. The NPPF 2023 makes specific reference to community led housing as a type of development that could be suitable as a rural exception site on sites that are not suitable for other types of housing. Further clarification is required on what this would mean in practice but the principle of community led housing on rural exception sites appears to be supported and this is reflected in policies BC3 and AG4.

There are a number of local [community land trusts](#) in Herefordshire as well as the [Marches Centre for Community Led Housing Group](#) which is a not for profit organisation covering the whole county as well as Shropshire and Telford and Wrekin. Given the growing interest in this type of housing delivery and increased support by government policy, the council is keen to support community led housing (CLH) in principle. Therefore policy BC3 is supportive of CLH as standalone schemes or where they are part of a larger development where they can contribute to affordable housing needs. CLTs can deliver mixed use developments or other types of development such as renewable energy or small scale employment sites and the council is, in principle, supportive of such schemes.