

**Interim position statement upon housing delivery
September 2016**

Introduction

1. The council adopted the Herefordshire local plan core strategy in October 2015 which sets out its long term land use planning policy. This included plans to deliver 16,500 new homes across the county by 2031 supported by improvements to infrastructure and proposals for new employment development to bring forward growth in the economy and jobs. Prior to the adoption of the core strategy, an examination in public was held and the independent inspector concluded that the plan's housing target was "reasonable and justified".
2. The Government's National Planning Policy Framework requires local planning authorities to identify a 5 year supply of housing land and currently there is only around 4.5 year housing supply in Herefordshire. A number of large strategic housing sites across the county, including at Holmer West and Three Elms in Hereford, are expected to come forward in the near future which will help to address this under supply.
3. Delivering new housing development is important for the future of the county and the Council is responding proactively to increase the supply and delivery of new homes in the county in order to meet adopted targets. The measures include working closely with developers of forthcoming large developments to ensure their timely release and significant progress is being made with neighbourhood development plans across the county which will also deliver housing growth.
4. Work on the Hereford area plan has commenced and recently, the council announced plans to procure a development partner to contribute to housing growth through the development of new homes on council-owned land. The council is also proactively progressing the delivery of essential transport infrastructure which supports the housing growth targets set out in the core strategy.
5. This interim statement provides an additional mechanism to help provide policy advice to support delivering housing growth in accordance with the core strategy during a period where a five year supply of housing land cannot be demonstrated.

Five year housing supply position

6. The National Planning Policy Framework (NPPF) requires that local planning authorities should identify and update annually a supply of housing sites sufficient to provide five years' worth of housing against their housing requirements. The core strategy inspector in her report of September 2015 considered that the five year housing land supply was "marginal but realistic" more recently inspectors at appeals have determined Herefordshire Council could not demonstrate a five year supply.

7. The housing supply position as of April 2016 has now been reassessed and the position set out in the five year housing supply position statement (www.herefordshire.gov.uk/media/8060801/5-year-supply-july-16.pdf). The methodology used in this statement is that which was agreed at the core strategy examination. It considers a range of sources of housing supply including:
- Extant planning permissions;
 - Strategic proposals in the adopted core strategy;
 - Proposals which are included in neighbourhood development plans (NDPs);
 - A “windfall” allowance – sites not specifically identified but are expected to come forward.
8. In determining whether a five year supply can be demonstrated the report compares the supply against the five year requirement, based upon the agreed core strategy trajectory and taking account of the past shortfall in completions and the need to include a 20% buffer (in accordance with the NPPF). The requirement consists of:
- planning commitments (outstanding planning permissions);
 - Sites which have received a resolution to grant planning permission between March 2015 - April 2016;
 - An estimated level of housing delivery on the core strategy strategic urban extensions;
 - An estimate of the housing delivered through neighbourhood plans over the next 5-years;
 - An estimate of other sites which will come forward (windfall allowance).
9. The resulting calculation is set out below in Table 1 this indicates that the housing land supply in the county stands at 4.49 years supply.

Table 1: Five year housing supply position at April 2016

Source	Homes
a) Core Strategy 2011 – 2031 target	16,500
b) Core Strategy requirement 1/4/2011 – 1/4/2016 (5 yrs)	3,000
c) Homes completed (net) 1/4/2011 – 31/3/2016 (5 yrs)	1,974
d) Core Strategy requirement for next five years 2016 – 2021	4,250
e) Plus residual shortfall (b minus c)	1,026
f) Plus 20% buffer (required by NPPF)	1,055
g) Total requirement (2016 – 2021) = d + e + f	6331
h) <i>Annualised requirement = (Total g divided by 5 years)</i>	1,266
i) Total deliverable dwellings* *(as set out in paragraph 6 above)	5,692
Housing supply (i divided by h)	4.49 yrs

8. Therefore, in the absence of a five year supply and in order to increase the delivery of new housing in the county Herefordshire Council positively encourages developers to come forward with proposals for suitable and sustainable housing developments to meet the county's needs.
9. Core strategy policy SS3 (see Appendix 1) provides the policy framework for where dwelling completions are below the target figure. The policy indicates that priority will be given to increasing housing supply using appropriate mechanisms including:
 - a. A partial review of the local plan; or
 - b. The preparation of new development plan documents (DPDs); or
 - c. The preparation of an interim position statement utilising evidence from the strategic housing land availability assessment.
10. This paper represents the interim position statement as set out in criterion c above. In determining sustainable planning applications for new housing developments the evidence available on sites identified in the strategic housing land availability assessment (SHLAA) process will be given weight as a material consideration. In particular, those sites in sustainable locations which have an indication of having no or a low level of constraints will be preferred to those sites which are identified as having significant constraints. Details of the SHLAA can be viewed on the Herefordshire Council Website at <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base/herefordshire-strategic-housing-land-availability-assessment> and <https://www.herefordshire.gov.uk/planning-and-building-control/planning-policy/local-plan-evidence-base/herefordshire-housing-land-assessments-2015>.
11. In addition, appropriate weight will be given to the policies and proposals in adopted/emerging NDPs which have reached at least Regulation 16 stage, particularly where the proposals are identified as emerging site allocations and plans are clearly consistent with the policies of the core strategy. Details of the NDPs in the county can be seen at <https://www.herefordshire.gov.uk/neighbourhood-planning>.
12. It should be recognised that this positive approach of Herefordshire Council does not mean that all applications for new housing development will be permitted. The NPPF itself recognises that in reaching a decision upon new housing the housing land supply position will need to be balanced against other factors in the development plan and/or NPPF which could result in the refusal of planning permission. The footnote to paragraph 14 of the NPPF identifies a list of areas where development should be restricted.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
13. Finally, it should also be noted that although the housing supply policies are considered to be out-of-date whilst a five year supply of housing land cannot be demonstrated, this does not mean that no weight should be attributed to these policies of the core strategy. The weight given to such policies is a matter of planning judgment and it may still be sufficient to justify a refusal of planning permission. For example this may be the case where acknowledged environmental interests would be

harmed. This may also be the case where a development is proposed which would result in a development disproportionate in scale to its location which would have a serious impact upon the role or function of a local settlement.

Appendix 1: Herefordshire Local Plan – Core Strategy policy SS3

Policy SS3 -Ensuring sufficient housing land delivery

A sufficient supply of housing land will be maintained to ensure the delivery of the Core Strategy housing target as set out in Policy SS2 over the plan period. The rate of housing delivery and supply will be assessed through the annual monitoring process. If monitoring demonstrates that the number of new dwelling completions is below the cumulative target figure over a 12-month monitoring period (1 April to 31 March) as set out in the housing trajectory in Appendix 4 the Council will prioritise increasing housing supply in the following monitoring periods using appropriate mechanisms which, depending on the scale and nature of potential under-delivery, will include:

- A partial review of the Local Plan – Core Strategy: or
- The preparation of new Development Plan Documents; or
- The preparation of an interim position statement and utilising evidence from the Strategic Housing Land Availability Assessment to identify additional housing land.

A range of strategic housing proposals are identified which are key to the delivery of the spatial strategy. In addition there are elements of key infrastructure which will need to be provided to enable full delivery of the strategic housing targets. The Council will work with developers and other stakeholders to ensure the timely development of these strategic proposals and the key infrastructure requirements.

Appendix 5 sets out the relationships between the delivery of housing and the timing of the main infrastructure requirements. It also identifies actions necessary to safeguard the integrity of the River Wye Special Area of Conservation (SAC) from adverse effects. The Council will actively monitor the relationships identified in this appendix. Any material delays in the implementation of identified infrastructure or environmental safeguards and which will lead to under-delivery of housing supply will inform the implementation of the range of measures set out above to ensure plan-led corrective measures are put in place.