

5 Year Housing Land Supply Position Statement Summary as of 1 April 2019 by Herefordshire Council

Purpose: Supporting information for the Ledbury Viaduct Appeal by Bloor Homes

Application Reference: 171532	Application Reference: APP/W1850/W/20/3244410
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1. This Appeal Position Statement presents a summary of the Five Year Housing Land Supply Calculation (5YHLS) as of 1 April 2019¹, for the five year period 1 April 2019 to 31 March 2024. It takes account of relevant changes in the revised National Planning Policy Framework (NPPF), published February 2019 and conforms to the approach for calculating 5YHLS as set out in the Housing Supply and Delivery section of the Planning Practice Guidance (PPG) published 22 July 2019.
2. The calculation is based on the housing requirement for the 20 year plan period 2011 to 2031, as set out in the Adopted Core Strategy²: 16,500 homes, phased as follows: 600 dwellings per hectare (dpa) 2011/12-2015/16; 850 dpa 2016/17-2020/21; 900 dpa 2021/22-2025/26 and 950 dwellings 2026/27 - 2030/31.
3. In assessing the 5-year supply position the following elements were considered:
 - a. **Sites with planning permissions include sites** with full planning permission, sites with outline permission and sites currently under construction as at 1 April 2019.
 - b. **Sites which have received a resolution to grant planning permission** between 31 March 2018 and 1 April 2019. These sites typically have been approved by planning committee and are awaiting a Section 106 agreement to be signed.
 - c. The contribution that **Core Strategy strategic housing** proposals can make to the five year supply. Delivery contributions are based on the developer's assumed build out rates together with the council's estimates for processing the application to a decision date.
 - d. A **windfall site allowance**. The Council has made no allowance for windfalls in the first three years in order to avoid double counting with existing commitments. As such there would be a windfall calculation for years 4 & 5. The current allowance of 100 dwellings per annum is a conservative estimate based on past rates.
 - e. An assessment of the realistic number of dwellings which are likely to be delivered through **neighbourhood development plans** over the five year period. Not all sites are expected to come forward so a reduced estimate of 288 dwellings is anticipated in years 2019-2024.
4. Following engagement with a variety of stakeholders, certain assumptions on the ability of sites to deliver in the five year period have been made. Where sites are slow at coming forward or known issues have come to the fore then discounting on a site by site basis has been necessary. For all sites with permissions or resolutions to grant permission a total 684 dwellings was discounted. A site by site assessment and

¹ Five Year Housing Land Supply Annual Position Statement 1 April 2019

https://www.herefordshire.gov.uk/download/downloads/id/18615/amr_2019_appendix_b_5_year_housing_supply_document_april_2019.pdf

² The Herefordshire Local Plan Core Strategy was adopted 16 October 2015 (less than 5 years ago)

https://www.herefordshire.gov.uk/info/200185/local_plan/137/local_plan_-_core_strategy/2

reasons for discounting are set out in Appendix 2 of the 5YHLS 2019 Paper³. A summary of the elements and a breakdown of the total supply is set out in Table 1 below.

Table 1. Total deliverable supply (1 April 2019 – 31 March 2024)

Deliverable (net)	Amount of dwellings	Discount	Total
Total	5370		
Resolution to grant permission sites (net)	155		
Total before discount	5525		
Commitments discount (full pp)		226	
Commitments discount (outline permission)		407	
Resolution to grant permission sites discounted		51	
Discount total		684	
Commitments plus resolution sites after discount	4841		4841
Strategic Urban Extensions			637
Neighbourhood Plans allocations. (without planning permission)	288		288
Windfall allowance for yrs. 4 & 5 in five year supply			200
Total deliverable sites			5966

Other factors were also considered and must form part of the final supply calculation, these include:

- f. **Past housing completions.** This takes into account homes already built from the start of the plan period 2011 to 2019. A total 3821 net completions have been built.
 - g. **The shortfall against plan targets** during the same period. Comparisons are made against the indicative trajectory. The Council's shortfall is 1,729 dwellings since 2011.
 - h. **20% buffer added to the requirement** as there has been an under-provision in the previous three years which has been less than 85% delivery on completion rates as per NPPF Footnote 39.
5. In light of all of the above the council can demonstrate the equivalent of **4.05 years'** worth of housing land supply. The final calculation table and components of supply are set out in the 5YHLS paper at Figure 10⁴. The updating the five year housing land supply provides an opportunity for the Council to review the information and assumptions made previously, as well as to include new sites that have been granted planning permission and exclude any that may have expired since the date of the previous calculation. The calculation should reflect any change in the development status of a site, including where this change may affect the likelihood of delivery of homes within the five year period. The next calculation will be prepared as at 1 April 2020 with the assessment taking place during April – July 2020.

³ 5YHLS Appendices

https://www.herefordshire.gov.uk/download/downloads/id/18616/amr_2019_appendices_to_5_year_housing_land_supply_document_april_2019.pdf

⁴ Five Year Housing Land Supply Annual Position Statement 1 April 2019

https://www.herefordshire.gov.uk/download/downloads/id/18615/amr_2019_appendix_b_5_year_housing_supply_document_april_2019.pdf