Local Development Framework Evidence Base

# Herefordshire's Strategic Housing Land Availability Assessment 2009-2026

October 2009







### HEREFORDSHIRE'S SHLAA

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#### **Executive Summary**

When preparing development plans, the Council is required to demonstrate and identify through their Strategic Housing Land Availability Assessment (SHLAA) that potential land is suitable, achievable and available to deliver the housing provision set out in the regional plan. The regional housing figures have yet to be finally approved. This SHLAA has been therefore based on the West Midlands Regional Spatial Strategy (WMRSS) Phase 2 Revision Panel Report figure of 18,000 houses to be delivered in Herefordshire by 2026 of which 8,500 houses are to be provided in Hereford.

Within Herefordshire, three development plan documents are being prepared as part of the Council's Local Development Framework (LDF) and these will eventually replace the current Unitary Development Plan. Each plan will need to be informed by this technical report of the potential housing land available and the choices of sites in existence for consideration through the plan making process.

The following information provides a summary from this SHLAA of the potential supply of land for housing on identified deliverable and developable sites in Herefordshire capable of delivering 5 or more dwellings over the next 17 years (2009–2026) and beyond.

**Deliverable sites** are those that are available now, are in a suitable location for housing and there is a reasonable prospect that housing will be delivered in the next five years. These comprise of existing planning permissions, outstanding allocations and sites where construction has commenced.

**Developable sites** are those that are, or are likely to become available for housing development, which satisfy the very broad suitability criteria established by the SHLAA and where there is a reasonable prospect they could be developed in the future.

The assessment considered 889 sites in total of which 367 sites are potentially suitable, available and achievable and could be considered further for inclusion within development plan documents. Estimates of capacity suggest that these sites offer the potential for 25,478 dwellings to be built between 2009-2026. Clearly not all these sites are required to meet the regional housing requirements and it is for the plan making process to consider the choice of sites available and decide which sites should proceed further into housing allocations.

It should be made clear that whilst offering potential for housing development, a number of these sites have significant constraints. Where this is the case, and through the development plan process, other more appropriate sites should be considered first. For the purposes of this study, significantly constrained sites have been programmed in later years.

Source				16-17 years 2024-2026	Total to 2026	Post 2026 (Significantly constrained
	Low cor	nstraints	Significant	constraints	2020	sites)
Dwellings identified on deliverable sites	3,215	180			3,395	
Dwellings identified on developable urban sites	2,011	4,458	3,965	5,862	16,296	8,791
Dwellings identified on developable rural sites	1,100	1,467	2,300	920	5,787	1,380
Total	6,326	6,105	6,265	6,782	25,478	10,171

- It is estimated that there are potential sites for 25,478 dwellings to be built in Herefordshire between 2009-2026 of which 3,395 can be provided on deliverable sites and 9,036 dwellings can be provided on developable sites with low constraints and 13,047 dwellings on developable sites with significant constraints
- Hereford has the potential to deliver 11,422 dwellings by 2026 with 1,249 on deliverable sites and 10,173 on developable sites of which 3,710 be provided on sites with low constraints and 6,463 dwellings on sites with significant constraints
- Bromyard has the potential to deliver 249 dwellings by 2026 with 177 on deliverable sites and 72 on developable sites of which 44 dwellings can be provided on sites with low constraints and 28 dwellings on sites with significant constraints
- Kington has the potential to deliver 204 dwellings by 2026 with 108 on deliverable sites and 96 on developable sites of which 84 dwellings can be provided on sites with low constraints and 12 dwellings on sites with significant constraints
- Ledbury has the potential to deliver 1,516 by 2026 with 16 on deliverable sites and 1,500 dwellings on developable sites of which 784 dwellings can be provided on sites with low constraints and 716 dwellings on sites with significant constraints
- Leominster has the potential to deliver 3,612 by 2026 with 572 on deliverable sites and 3,040 dwellings on developable sites of which 1,286 dwellings can be provided on sites with low constraints and 1,754 dwellings on sites with significant constraints
- Ross-on-Wye has the potential to deliver 1,783 dwellings by 2026 with 368 on deliverable sites and 1,415 dwellings on developable sites of which 561 dwellings can be provided on sites with low constraints and 854 dwellings on sites with significant constraints

- The Rural Areas have the potential to deliver 6,662 dwellings by 2026 with 905 dwellings on deliverable sites and 5,787 dwellings on developable sites of which 2,567 dwellings can be provided on sites with low constraints and 3,220 dwellings on sites with significant constraints
- 10,171 dwellings have been identified for post 2026 and can be considered further through a revision of the development plan.

#### **Cautionary Note**

Future plan policies on housing development will be based on many considerations of which this report is only one. This is a technical report used to inform policy rather than a policy document in its own right. The identification of any site in this study does not indicate that it will successfully obtain planning permission for housing or will be allocated for housing development in any new plan. In addition, the non inclusion of a site does not preclude its residential development providing it meets the policies at the time. This study represents a snap shot in time. Additional sites are likely to continue to become available and this study should not be regarded as definitive for the lifetime of the LDF. It is a 'living document' that will need to be reviewed through the Annual Monitoring Report (AMR), the monitoring framework of the LDF.

## 1.0 WHAT IS A STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA)?

- 1.1 The production of a Strategic Housing Land Availability Assessment (SHLAA) is required by Planning Policy Statement 3: Housing (PPS3) and is a key component of the Local Development Framework (LDF) evidence base to support the delivery of sufficient land for housing in Herefordshire. It provides information on the site opportunities that exist in and around the County's main settlements to meet Herefordshire's regional housing provision. The information set within this SHLAA will inform future LDF planning documents commencing with the Core Strategy. This is the first SHLAA that has been undertaken for Herefordshire and has been produced in line with the Department of Communities and Local Government (CLG) Practice Guidance, July 2007.
- 1.2 The SHLAA is a technical report. It is not setting policy but provides the background evidence on the **potential** availability of land in Herefordshire for housing and the choices available for delivering housing. The SHLAA is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for housing development. Future planning documents will need to consider what policy approach is appropriate in order to deliver Herefordshire's housing provision based on this evidence. While the SHLAA will assess whether sites are potentially suitable for housing, this should only be taken to mean that they are suitable provided they are not required for other purposes and are required to meet plan purposes. In addition, the SHLAA does not preclude residential development on other sites that have not been identified in the SHLAA.
- 1.3 This SHLAA has involved an assessment of the likely total numbers of new houses that could be achieved on sites of 5 or more dwellings and when these could be built on an annual basis within 5 year periods from 2009 to 2026. The SHLAA takes into account the **availability** of identified sites, their **suitability** and their **achievability** for housing including whether the potential sites could in theory be brought forward by the housing industry. In addition, the SHLAA has re-assessed the potential of outstanding planning permissions and plan allocations to calculate the likely level of housing that they are expected to deliver. The Government and the Council need to be confident that there is sufficient land within the County to meet its housing provision.

#### 2.0 DEVELOPMENT PLAN CONTEXT

- 2.1 The West Midlands Regional Spatial Strategy (WMRSS), adopted January 2008, is the relevant regional plan covering Herefordshire. Its housing figures are under review and will cover the period to 2026. This SHLAA will demonstrate that sufficient land is available within the County to meet the housing requirements of the panel report (September 2009) into the Phase 2 revision of the regional plan.
- 2.2 The Unitary Development Plan (UDP) for Herefordshire was adopted in March 2007 and covers the plan period up to 2011.
- 2.3 These two documents contain the plan policies which provide the current planning framework for the County.

2.4 Work has commenced on the LDF for Herefordshire with preparation of the Core Strategy and two development plan documents; the Hereford Area Plan and the Market Towns and Rural Areas Plan as identified in the Council's Local Development Scheme. These new plan documents will eventually replace the UDP and will provide the planning policy framework for the County. Using the site/capacity information contained within this SHLAA, the Core Strategy will break down the reviewed regional housing figures into amounts of housing to be found in Hereford, the market towns and the rural areas. Submission of the Core Strategy is expected early 2011 with adoption anticipated later on in the year. The Hereford Area Plan and the Market Towns and Rural Areas Plan will provide more refined, additional site information in respect of housing. The SHLAA will inform the preparation of all of these planning policy documents.

#### 3.0 HOW MUCH HOUSING IS HEREFORDSHIRE EXPECTED TO DELIVER?

3.1 The housing figures within the RSS are currently being reviewed. The RSS Phase 2 Revision Preferred Option was submitted to the Secretary of State in December 2007. The revision proposed a figure of 16,600 dwellings to be built in Herefordshire for the period 2006–2026 with half being provided within Hereford. Following the Examination held during May/June 2009, the Report of the Panel (September 2009) has been sent to the Secretary of State. This has increased housing figures to be delivered in the County to 18,000 with 8,500 to be provided in Hereford. Final approval of the RSS is expected in 2010. This SHLAA will provide evidence to demonstrate that there is sufficient land to meet the housing figures contained in the panel report.

#### 4.0 HEREFORDSHIRE'S SHLAA

4.1 This SHLAA has been produced in line with the various stages identified within the Department for Communities and Local Government (CLG) Practice Guidance.

#### 4.2 Stage 1 – Planning the assessment

4.2.1 This initial stage related to the project planning required and the decision to undertake the piece of work in-house. In addition, the following areas were agreed:

#### The SHLAA study area

- 4.2.2 Para 7 of the practice guidance states that 'the study area should preferably be a subregional housing market area, but may be a local planning authority area, where necessary'. Herefordshire along with Shropshire forms part of the Western Housing Market Area, as defined by the WMRSS. However, given the scale of the task and the conclusion of the regional Ecotech report October 2006 that Herefordshire has a relatively self contained housing market then this SHLAA has taken the administrative area for the County as its study area. The Ecotech report can be obtained from the West Midlands Regional Assembly and was used as technical work to support the RSS Phase 2 revision.
- 4.2.3 The SHLAA practice guidance (Para 7) states that the study should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. It is clear that the guidance seeks to identify the maximum number of possible locations where housing could be provided within the housing market area and not just the main urban locations as it is the role of the plan making process to assess the sustainability and suitability of a site or location for housing.

- 4.2.4 Herefordshire is a very large rural County covering 842 square miles (2,180 square km) with a dispersed settlement pattern and a population of 178,400 (mid year estimate 2007). It would not be possible with available resources to assess every settlement in the County. The adopted UDP (2007) included a settlement hierarchy which aligned itself with national/regional policy which sought development in the most sustainable locations and did not advocate significant development in rural areas. This hierarchy identified Hereford along with the market towns of Bromyard, Ledbury, Leominster, Kington and Ross-on-Wye and 48 main villages and 36 smaller settlements as representing the areas where the majority of housing development should be focussed. In determining the hierarchy in rural areas aspects such as access to public transport, services (e.g. school, shop, village hall, public house), employment opportunities and population levels were considered and led to identification of the most sustainable and appropriate places for growth. In the rural areas the SHLAA has assessed sites in all UDP main villages listed in Appendix 1. UDP smaller settlements which are unlikely to be subject to significant housing land allocations given their size and rural location have not been included in this SHLAA study.
- 4.2.5 In taking this approach the SHLAA has targeted resources to the areas most likely to be identified for development, the centres of Hereford and the market towns, and the main villages located on the principal public transport corridors as required in paragraph 26 of the guidance. Sites that were submitted for consideration outside of these areas were regarded as open countryside and in line with national policy were not considered sustainable and appropriate for housing purposes.

#### Context setting: Hereford, Market Towns, Rural Areas

- 4.2.6 In the context of Herefordshire, the County's main settlement is the cathedral city of **Hereford** with a population of 55,400 (mid year estimate 2007) which forms a natural focus, centrally located and at the hub of existing road and public transport networks. Its role as a focus in the sub region, recognised in the Regional Spatial Strategy, reflects the extensive hinterland of the City for jobs, health, education and many other services. However, limits on transport capacity in particular currently restrict the extent to which Hereford can accommodate new development. The need to overcome this significant constraint has been amplified by Hereford being designated as a Growth Point identified to deliver 8,500 houses by 2026 in the RSS panel report. Since 1996, Hereford has accounted for just over a quarter of the County's new housing provision averaging around 210 completions per year. The delivery of 8,500 new dwellings by 2026 almost doubles previous house builds and will be challenging. The delivery of a balanced package of transport improvements including an Outer Distributor Road, linked to housing delivery is required to deliver this level of growth.
- 4.2.7 The market towns of **Ledbury** and **Ross-on-Wye** with a population of 9,900 and 10,100 respectively (mid year estimate 2007) are located on the eastern side of the County with excellent road connections to the national motorway network providing easy and convenient access to the larger urban areas of Gloucester, Cheltenham, Bristol and Birmingham. The high quality environment surrounding these attractive towns linked to good accessibility have made them popular areas in which to live. However, the attractive landscapes which surround these towns, which include in part Areas of Outstanding Natural Beauty, have made it difficult to identify suitable housing sites with low constraints.

- 4.2.8 The town of **Leominster** with a population of 11,100 (mid year estimate 2007) offers significant potential for housing growth given it is less constrained in terms of landscape setting. The town has many attractive assets. In addition, it is well connected with a main line railway station and lies adjacent to the A49 trunk road. Despite all these positives the town has lower mean house prices and areas of deprivation. The Regional Development Agency has recently delivered an Enterprise Park as well as provision of a new access road which skirts the southern and eastern edge. The delivery of housing growth would need to address the current congestion and air pollution issues being experienced within the town centre. The provision of a southern relief road linked to housing growth would overcome these problems delivering wider benefits for the town's community.
- 4.2.9 The remaining market towns of **Bromyard** and **Kington** with populations of 4,600 and 3,200 respectively (mid year estimate 2007) are important service centres supporting their rural hinterlands and have retained their attractive historic character with traditional small independent retailers occupying the high street. The attractive landscapes which surround these towns have made it difficult to identify suitable housing sites with low constraints.
- 4.2.10 The remaining rural areas cover a significant proportion of the County. This SHLAA has assessed the 48 larger, more sustainable settlements as defined in the UDP. Historically there has been demand to live within these settlements with significant amounts of small developments coming through windfalls, i.e. sites that have not been allocated within a plan. Since 1996 most of this housing (86%) has been from windfall development. Housing development within the rural areas has accounted for 45% of the County's overall housing completions.
- 4.2.11 It should be noted that as part of the evidence base for the LDF a review of settlement hierarchy is being undertaken and capacity evidence from SHLAA is being used to inform this work.

#### Housing issues

- 4.2.12 Identified below are some of the key housing issues facing the County which provide some context for this SHLAA:
  - Herefordshire has the 4th lowest overall population density in England (0.8 persons per hectare), and the population is scattered across the 842 square miles of the County
  - Just under a third of residents live in Hereford; just over a fifth in the five market towns (Leominster, Ross, Ledbury, Bromyard and Kington). This means that nearly half of the population lives in villages, hamlets and isolated dwellings in rural areas. A scattered population and dispersed settlement pattern presents particular challenges for the sustainable delivery of housing
  - Overcoming significant infrastructure constraints to deliver the scale of housing growth required to meet Hereford's Growth Point status
  - The need to balance the high demand to live in certain areas of the County with protection of the high quality landscape setting of those settlements
  - High amount of in migration particularly from Eastern Europe to work predominately in the agricultural sector. This work is often low paid, casual and temporary which presents housing challenges. During 2008, a total of 6,700

- Significant affordable housing issues particularly in the rural areas. Herefordshire has the worst affordability ratio out of the West Midlands authorities and neighbouring counties
- Predominance of detached housing in rural areas
- The expected growth of one person households
- The continuing ageing population profile of the County, and
- The need to address the windfall position given the changing stance of national guidance.

#### Partnership working

- 4.2.13 Herefordshire's SHLAA has depended upon partnership working throughout its preparation principally through a stakeholder group and developer panels which collectively form the Housing Market Partnership for Herefordshire.
- 4.2.14 The Stakeholder Group has determined the brief, methodology and considered results as the assessment has progressed. The developer panels have led the viability assessment, set parameters on constraints, delivery and site densities. All urban sites have been assessed by a panel. The partnership has helped steer the SHLAA and has been invaluable in terms of assessing sites developability as well as giving more general advice on the current state of the housing market within the County. The following groups have been represented on the partnership: large and small house builders, local architects, Home Builder's Federation, Registered Social Landlords, Natural England, Environment Agency, the Highways Agency, a local Estate Agent, Campaign to Protect Rural England (CPRE), Welsh Water and Council officers. Members of the SHLAA Housing Market Partnership and dates of meetings are included in Appendix 2.

#### <u>Methodology</u>

4.2.15 The SHLAA has been undertaken in line with the 2007 CLG Practice Guidance. This guidance is intended to be 'practical' and essentially contains a step by step guide to undertaking an assessment. The guidance (Para 15) makes it clear that the methodology set out in the document is intended as a blueprint for assessments to follow and that 'when followed, a local planning authority should not need to justify the methodology used in preparing its assessment, including at independent examination'.

#### Other LDF Studies

- 4.2.16 This SHLAA has taken on board other evidence based studies which are being undertaken to support the Core Strategy and following development plan documents Hereford Area Plan, the Market Towns and Rural Areas Plan. This includes the Employment Land Review which identifies poor and medium employment sites and the Green Infrastructure Study/Strategy for an enhanced green infrastructure network and accessible open spaces. The following other evidence base studies/assessments have helped build a knowledge base on particular sites and in respect of Hereford and the market towns, areas of land in and around the built up areas:
  - Rapid Townscape Assessment : Phase 1 Hereford

- Provides an overview of historic townscape character and an informed basis for new housing.
- Preliminary study for Historic Environment Development Impact and Designs Study (HEDIDS) : Phase 1
  - To identify historic environment constraints on the location of new development and to promote the historic landscape for innovative design of new places and communities.
- Urban Fringe Sensitivity Analysis
  - To access the landscape capacity to assimilate new housing.
- Building Biodiversity into Herefordshire's SHLAA
  - To identify biodiversity constraints, sensitivities and opportunities in relocation to potential new housing development.

Note: All above studies can be found on the Herefordshire Council's LDF Evidence Base website www.herefordshire.gov.uk/ldf.

#### Procedure

- 4.2.17 A 'call for sites' in summer 2007 and desk top studies identified sites which subsequently have been assessed in Hereford, the market towns, and the main villages. This included a technical consultation of sites which started in July 2008 and site viability assessments. In respect of Hereford and the market towns these have been undertaken in partnership with the development industry.
- 4.2.18 Whilst an initial SHLAA report was issued in June 2008, this has been further refined to include additional information. This version of SHLAA has been issued to inform the Core Strategy 'Place Shaping' consultation in January 2010.
- 4.2.19 Finally, sites have and will continue to become available and site conditions may change and as such this key part of the evidence base should not be viewed as a static document but will need to be regularly reviewed and updated. In this regard the SHLAA should be seen as a 'living document' to be reviewed annually through the AMR.

#### Base Date for SHLAA

4.2.20 The base date for housing data contained within the SHLAA is 1<sup>st</sup> April 2009. The SHLAA covers the period 2009–2026, this is to ensure that the Council has an understanding of the housing potential across the County for the duration of the Plan period of the WMRSS and other emerging LDF plan documents (2006–2026). The yields from the SHLAA are therefore set in a series of time bands which reflect the five year periods required through the guidance. These are 2009–2014 (5 years from base date), 2014–2019 (years 6-10 from base date), 2019–2024 (years 11-15 from base date), 2024–2026 (remaining years in plan period). Some potential sites could have development going beyond 2026 as part of their phasing and this will also be indicated.

### 4.3 Stages 2, 3 and 4 - Determining which sources of sites will be included within the assessment and which sites will be surveyed

4.3.1 A maximum range of sources of sites have been considered in order to provide the most robust assessment of likely availability. These sites fall into two groups of potential housing sources: those sites already within the planning process and those which are not.

The SHLAA has assessed the following types of sites as set out below:

#### Sites in the planning process

- 4.3.2 These include where the principle of housing has been established
  - Unimplemented/outstanding planning permissions for housing All current planning permissions as at 1<sup>st</sup> April 2009 have been assessed regarding their suitability/deliverability. Based on past rates a lapse rate of 5% and a superseded rate of 8% have been applied. A sample of applicants have been approached to obtain information on deliverability to ensure accurate information has been included within SHLAA and it would appear that all of those contacted are confident that they can deliver within 5 years despite the current down turn in the market.
  - Planning permissions for housing that are under construction. A sample of applicants were contacted to obtain information on deliverability to ensure accurate information was included within SHLAA.
  - Existing housing allocations All UDP housing allocations were considered as part of the desktop review. Many of the allocations have obtained planning permission. Those that remain plan allocations have been reviewed and included as opportunity sites in this study where appropriate. Only one allocated site in Leominster has been deleted from this study as it is not now considered deliverable.

#### Sites not currently in the Planning Process

- 4.3.3 Sites contained within the following studies have been drawn into the SHLAA for assessment. These include:
  - Sites in the Urban Capacity Study, 2001
  - Sites in National Land Use Database, 2008
  - Council owned land
  - UDP housing representation sites considered through the UDP process
  - Herefordshire Housing Association redevelopment sites
  - Vacant property register (industrial/commercial)

- Redevelopment sites identified in the Townscape Characterisation studies. These studies provide an overview of an area's historic and townscape character and identification of sites and opportunities for high quality development and enhancement
- Sites submitted initially through the 'call for sites' process. The 'call for sites' was advertised through a press release, public notice and also through the Council's website. The public were invited to complete a site proforma. The press release, public notice and site proforma can be found at Appendix 3. The exercise generated a significant level of response with over 500 sites being identified
- Sites identified by planning officers in Hereford, market towns of Bromyard, Kington, Ledbury, Leominster, Ross-on-Wye and the UDP main villages that were not covered by the above sources
- Land allocated (or with permission) for employment where development has not yet taken place. Land/premises safeguarded for employment which are of poor or moderate quality or where the alternative use of housing would be more beneficial as identified in the Employment Land Study (2009)
- Other safeguarded land i.e. recreational thought or known to have development potential where wider community benefits would result
- 4.3.4 Ordnance survey mapping is a key element to any SHLAA and provides the base for all assessment and presentation. The Council provided a GIS base for the study area and all identified sites from the above sources were mapped and linked to a database. These maps are available on the Council's website.

#### 4.4 Stage 5 - Carrying out the survey work

#### Desk top study

- 4.4.1 Paragraph 21 of the guidance identifies that particular types of land may be excluded from the assessment where justified. The following areas of land have been excluded from further study:
  - Flood plain (Zones 3a, 3b and functional floodplain) as protected from development through Planning Policy Statement 25
  - Nature conservation designations Sites Special Scientific Interest/Special Wildlife Sites/Sites of Importance to Nature Conservation as protected from development through Planning Policy Statement 9
  - Policy RST4 land Recreational land within Herefordshire covered by UDP Policy RST4. This policy protects such land from development unless compensatory provision provides enhanced facilities elsewhere. As such and guided by the PPG 17 study (which can be found on the Council's website) the majority of RST 4 land, including allotments, has been excluded from this study. The exceptions are Hereford Racecourse and Bishops and Aylestone School playing fields. The

• Sites in the rural area, outside of the main settlements fall outside the scope of this study i.e. smaller settlements as defined as H6 settlements of the UDP and open countryside

#### Technical Consultation – Assessing suitability of sites for housing

- 4.4.2 A site is *suitable* for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities.
- 4.4.3 Para 25 of the Practice Guidance indicates that for site survey a 'minimum size of site' may be chosen. This should reflect the local circumstances of the area and its housing market but also reflect the resources available to the study.
- 4.4.4 A site threshold of 5 dwellings or more units is considered to be an appropriate scale to be able to identify and assess using an appropriate level of resources and therefore this level has been adopted for this study. The following has been applied:

Sites of 5 dwellings and above not currently in the planning process in Hereford and the market towns

- 4.4.5 A total of 332 urban SHLAA sites, with a capacity for 5 dwellings and above, have been assessed within Hereford and the market towns, of which 156 sites were considered suitable and achievable. These sites have been subject to a comprehensive technical consultation with key stakeholders to assess their suitability for housing development as well as identifying particular constraints which may impinge on their deliverability. This has included specific comments from Welsh Water in respect of water supply, sewerage and sewage treatment and highways/access information provided by the Council's Transport Area Engineers.
- 4.4.6 A copy of the site assessment form used to gather this information can be found at Appendix 5 and includes information on site size, boundaries, current use, surrounding land uses, physical constraints, followed by an initial assessment on the sites suitability for housing. This ensured a consistent approach to gathering information and assessing sites. All assessment schedules can be found in accompanying SHLAA documents on the Council website.

Sites of 5 dwellings and above not currently in the planning process in the rural settlements

- 4.4.7 A total of 557 rural sites within the 48 main villages have been assessed internally by Council planning, conservation, and highway officers to assess their suitability for housing development, of which 211 sites were considered suitable and achievable.
- 4.4.8 All the information gathered through site surveys and technical consultation has been assessed and a decision made on the suitability of the site and the ability of a site to overcome any of the constraints identified. Sites have been categorised into those with low/minor constraints and those with potential but with significant constraints.

- 4.4.9 Meetings have taken place at the request of developers and agents particularly on larger sites in Hereford, Leominster, Ledbury and Ross-on-Wye and this has helped to further refine site information.
- 4.4.10 The sites considered unsuitable following appraisal for housing have not been furthered within the SHLAA. Appendix 11 lists these sites along with a reasoned justification for their deletion from the study.
- 4.4.11 The recognition of SHLAA sites as suitable for housing purposes does not circumvent the plan led system. The UDP remains the principal basis upon which decisions are made through the Development Management process. To this end, any planning applications submitted for sites included in the SHLAA will continue to be assessed primarily against UDP policies until its replacement by another LDF document.

#### 4.5 Stage 6 – Estimating the housing potential of each site

- 4.5.1 Having identified potential sites the next step looked at quantifying supply of dwellings that could be accommodated on each suitable site. The housing partnership agreed the use of density multipliers to assess yields. These multipliers are based on those set out in the adopted UDP and include:
  - Town centre sites between 30 and 50 dwellings per hectare (assume average of 40)
  - Other sites 30 dwellings per hectare
- 4.5.2 It should be noted that intensification of existing areas has taken into account the potential impact on the character and distinctiveness of an area. An element of flexibility has been applied dependent on the character of the area and the mix and type of housing being provided. In addition, on larger sites a discount of 10% has been applied to account for other land uses such as open space.
- 4.5.3 The figures were further refined through the developer panels when considering the viability of sites.

#### 4.6 Stage 7 – Assessing when and whether sites are likely to be developed

- 4.6.1 All sites considered in the SHLAA have been broadly divided into three categories:
- 4.6.2 **Deliverable sites** are those that are available now, are in a suitable location for housing and there is a reasonable prospect that housing will be delivered in the next five years. These comprise existing planning permissions, outstanding allocations and sites where construction has commenced.
- 4.6.3 **Developable sites** are those that are, or are likely to become available for housing development, which satisfy the very broad suitability criteria established by the SHLAA and where there is a reasonable prospect they could be developed in the future.

4.6.4 **Not currently developable sites** are those that do not pass suitability testing, and or are considered unachievable for housing at this time. These sites are not included within the final supply of sites defined as deliverable and developable.

#### Assessing availability for housing

- 4.6.5 A site has been considered **available** for development when it is understood that there are no legal or ownership problems. This means that it is controlled by a housing developer who has expressed an intention to develop, or the land owner has expressed an intention to sell or, at least a willingness to consider development. In addition, further information was gained from developers through the developer panel meetings and through local information from the Council's Development Management section. All readily available data has been included.
- 4.6.6 Sites which have been categorised as having low/minor constraints have been identified as being available earlier on in the plan period and those more complex sites with potential but with significant constraints have been identified as available later on in the plan period.

#### Assessing achievability

- 4.6.7 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 economic viability of a site and the capacity of the developer to complete and sell the housing over a certain period. It will be affected by taking into account market, cost and delivery factors.
- 4.6.8 The developer panels, provided the advice on whether 'suitable' sites are achievable for housing development.
- 4.6.9 Sites considered 'suitable' by the SHLAA may still be subject to development constraints which would need to be overcome prior to the site coming forward. In accordance with the practice guidance these constraints have wherever possible been identified by the site assessment along with possible mitigation measures. In addition, appropriate phasing has been applied relating to the scale/mitigation timescale of the constraint. More information on these constraints can be found within the individual site assessment schedules for each location. However, the following significant constraints currently known are listed as follows:
  - Hereford Outer Distributor Road
  - Constraint on the capacity of the electricity supply at Hereford
  - New sewerage works or upgrading of existing for Hereford/Bromyard, as limited capacity
  - New link road for Leominster
  - Water resources and nature conservation issues of the River Wye/Lugg both designated Special Areas of Conservation (SACs)

- Nature Conservation constraints with bat foraging areas around Ross-on-Wye
- 4.6.10 Additional development costs were taken into account in making viability judgements on sites. Developer panel advice has been made on the basis that there will be an expectation by the Council that developer contributions will be required. The Council's Supplementary Planning Document (SPD) on Planning Obligations took effect on 1<sup>st</sup> April 2008. This is available on the Council's website. The panel group also agreed that Code Level 3 of the Code for Sustainable Homes be used for the purposes of this assessment. This position will be kept under review.
- 4.6.11 Herefordshire's SHLAA covers a plan period up until 2026. The current economic downturn was considered and the panel agreed that a scenario of normal market conditions should be used when considering annual housing build out rates from SHLAA sites. This was justified on the basis that the current economic downturn would be followed by a period of growth with the peaks and troughs eventually cancelling each other out over the plan period.
- 4.6.12 The panels considered all identified sites with a capacity of 5 dwellings and above located within Hereford and the market towns and also provided comment on site availability, density, suitability and timescale for delivering sites. An agreed methodology and site proforma were agreed by the panel group and these can be seen at Appendix 7. The proforma follows the guidance seeking information on market factors, cost factors and delivery factors leading to a conclusion on viability.
- 4.6.13 In addition, the panel group considered whether there was a market for small pockets of housing growth in the rural settlements of the County. These sites are generally greenfield with limited constraints. The rural areas have historically been areas which have consistently delivered housing and are attractive areas where people want to live. The panel group saw no reason why this trend should not continue. This has been fed into the SHLAA process.
- 4.6.14 For the purposes of assessing site deliverability of current planning permissions over the next five years, a more cautious approach was agreed. A sample of those that have a current live planning permission or have commenced a planning permission on a site of 5 dwellings and above have been contacted and information has been gained on the expected delivery/build out rates of those permissions. This information has been fed into the assessment.
- 4.6.15 The sites considered unviable following appraisal have not been furthered within the SHLAA. Appendix 11 includes these sites along with a reasoned justification for their deletion from the study.
  - As a result of the above, the study has concluded whether sites are deliverable or developable
- 4.6.16 This SHLAA report draws together the findings of the assessment of potential housing sites in the County through a number of tables and trajectories as part of a wider conclusion section. Much of the detailed site information is included in a series of appendices to the main report.

4.6.17 The next section has been divided into two parts: Firstly outlining the findings of the SHLAA in relation to the five year land supply of deliverable sites for housing and secondly the broader 1-17 year supply of developable sites within the Plan area up to 2026.

Part 1 – Deliverable sites: Five Year Housing Land Supply (2009-2014)

- 4.6.18 Under the provisions of PPS3 the Council is required to demonstrate it has a five year supply of readily deliverable sites for new housing provision as established through the RSS.
- 4.6.19 The SHLAA is an important tool to inform plan making through identifying the potential supply of land for housing on sites that may be developable in the future. However, this evidence cannot be relied upon to demonstrate a supply of sites that may be deliverable in the next 5 years. The SHLAA does not provide the certainty needed in demonstrating the 5 year land supply. Until the adoption of new development plan documents that give this certainty over land allocation and which include spatial planning policy for locations where new housing may be acceptable, the Council will demonstrate the supply of sites that may be deliverable in the next 5 years in accordance with an advice note published by the CLG.
- 4.6.20 The CLG advice note makes clear that 5 year housing land supply assessments should include:
  - Sites that are allocated for housing in the development plan
  - Sites that have planning permission which have not been implemented
  - Specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period and which have made significant progress through the planning process
- 4.6.21 This assessment has identified current planning permissions/allocations sites that have a reasonable prospect of delivering housing within the next 5 years and net yield figures have been used. A lapse rate of 5% and a superseded rate of 8% has been applied with a build out rate skewed to the latter end of the five year period to account for current economic conditions. This delivery trend has been confirmed through contacting a sample of applicants. These sites, along with allocations, are listed in a table accompanying this report and identify the potential net supply of 1,965 dwellings to be found on these deliverable sites in the 5 year period 2009–2014. These are summarised in Table 1:

Planning permissions at 1 <sup>st</sup> April 2009 by location	2009/10	20010/11	2011/12	2012/13	2013/14	Gross <sup>1</sup> Total 2009/14	Net <sup>2</sup> Total 2009/14
Hereford	106	133	187	116	105	744	647
Bromyard	6	7	14	7	7	47	41
Kington	7	12	15	12	7	61	53
Ledbury	1	2	4	2	1	12	10
Leominster	50	115	166	117	50	572	498
Ross-on-Wye	20	30	50	31	20	174	151
Rural Areas	60	131	164	150	60	649	565
Total <sup>3</sup>	250	430	600	435	250	2,259	1,965

Table 1: Assumed delivery of sites with planning permission not yet commenced by location

<sup>&</sup>lt;sup>1</sup> Gross total represents overall increase in housing stock <sup>2</sup> Net total represents overall increase in housing stock taking into account new dwellings plus and gains and losses through change of use and conversions/demolitions <sup>3</sup> Including 5% lapse rate and 8% superseded rate

Summary of deliverable sites 2009 - 2014	2009/10	20010/11	2011/12	2012/13	2013/14	Total 2009/14
Sites under construction	400	36				436
Sites with permission not yet commenced	250	430	600	435	250	1,965
UDP allocations without planning permission		150	150	150	364	814
Total <sup>4</sup>	650	616	750	585	614	3215
Panel Report indicative average annual rate <sup>5</sup>	235	235	795	795	795	x

Table 2: Potential number of dwellings that could be completed on deliverable sites

 Table 3: Deliverable sites by location 2009–2014

Location	Sites with Planning Permission	Allocations	Sites under construction	Total
Hereford	647	319	215	1,181
Bromyard	41	127	0	168
Kington	53	0	50	103
Ledbury	10	0	5	15
Leominster	498	30	13	541
Ross-on-Wye	151	180	17	348
Rural Areas	565	158	136	859
Total	1,965	814	436	3,215

 <sup>&</sup>lt;sup>4</sup> Including 5% lapse rate and 8% superseded rate.
 <sup>5</sup> Based on residual element of housing requirement of 2006-11 period requirement of 530 pa to be built minus net additions to stock 2006–9 of 2,180.

4.6.22 The RSS provides the basis for determining the current 5 year supply of land. Taking the panel report Herefordshire is expected to deliver 18,000 houses between 2006 and 2026. Between 2006 and 2009, 2,180 houses net were built leaving a remainder of 15,820 dwellings to be provided over the remaining plan period. This relates to 931 dwellings a year for the remaining plan (refer to Table 4 below).

	Dwellings	Average dwellings per annum
RSS panel report 2006–2026 requirement for Herefordshire	18,000	900
Net additions to stock – 2006 – 2009	2,180	727
Residual requirement for 2009 - 2026	15,820	931
RSS panel report 2006–2011 requires 530 pa to be built minus net additions to stock of 2,180	470	x
RSS panel report 2011–2014 requires 795 pa to be built	2,385	x
Requirement for 5 years 2009–2014	2,855	571

Table 4: RSS Housing Requirements

- 5 year supply on deliverable sites = 2,855
- 4.6.23 Between 2006 and 2009 there was a net addition to the housing stock of 2,180 dwellings. Therefore to meet the RSS panel report figures of delivering 18,000 houses between 2006 and 2026 there is a requirement to provide 15,820 dwellings between 2009 and 2026 and 2,855 dwellings within the five year period 2009–2014. This has taken on board the phasing contained within the panel report of the RSS which has taken the current downturn into consideration. The report identifies an annual build rate of 530 dwellings per year between 2006–11 increasing to 795 per year between 2011-16. There is capacity to deliver 3,215 dwellings through deliverable sites which indicates that there is sufficient land to meet the 5 year land requirements. However, the trajectory does demonstrate that there is insufficient land from 20011/12 for the last three years to meet the panel report phasing rate. The surplus from the first two years is sufficient to meet the requirement in the remaining three years so overall sufficient land is available. Details of this trajectory can be found in Appendix 12.

#### Part 2 - Developable sites 2009–2026

4.6.24 Developable sites are those that are considered to be suitable, available and achievable as identified by the SHLAA, where there is a reasonable prospect they could be developed by 2026. To avoid double counting the potential supply of new dwellings, it excludes sites considered to be deliverable in the next 5 years, which are included in Part 1 and the figures in Table 2 above. However, the potential yield on developable sites will also

include dwellings that could be completed from planning commitments after 2013 and which are not included in Table 2. Their inclusion as sites with planning permission which are not expected to be completed within 5 years avoids undercounting supply.

4.6.25 Table 5 below summarises the housing potential from the various SHLAA sources of developable sites in the period 2009–2026. Details of these sites are included in Appendix 10.

**Table 5:** Total potential housing provision on identified sites (dwellings) in the next 17 years (2009–2026)

Source	Low co	nstraints	Significant	Years16-17 2024- 2026 constraints	Total 2009- 2026	Post 2026
Deliverable planning commitments post 2014		180			180	
Dwellings delivered on SHLAA urban sites	2,011	4,458	3,965	5,862	16,296	8,791
Dwellings delivered on SHLAA rural sites	1,100	1,467	2,300	920	5,787	1,380
Total	3,111	6,105	6,265	6,782	22,263	10,171

Location				Years 16-17 2024–2026	Total 2009- 2026	Post 2026
	Low co	nstraints	Significant	constraints		
Hereford City	1,068	2,642	3,182	3,281	10,173	4,921
Bromyard	14	30	x	28	72	42
Kington	79	5	х	12	96	18
Ledbury	234	550	x	716	1,500	1,074
Leominster	455	831	433	1,321	3,040	1,980
Ross-on-Wye	161	400	350	504	1,415	756
Rural Areas	1,100	1,467	2,300	920	5,787	1,380
Total	3,111	5,925	6,265	6,782	22,083	10,171

**Table 6:** Total potential housing provision on identified developable sites (dwellings) in the next 17 years (2009–2026) for Hereford, the Market Towns and Rural Areas

#### 4.7 Stage 8 – Review of assessment and summary of capacity

#### Overall potential supply from sites

4.7.1 The principal purpose of undertaking a SHLAA is to identify housing potential across a plan area over at least a 15 year period. In order to have an understanding of housing potential over the lifespan of the emerging WMRSS this SHLAA has identified the period 2009–2026. This SHLAA has identified potential for 25,478 dwellings on deliverable and developable sites over the next 17 years. The potential supply from sites is summarised in Table 7 below:

**Table 7:** Summary of total potential supply provision on deliverable and developable sites in the 17 year period 2009–2026

Source				Years16-17 2024–2026	Total 2009-2026
	Low cor	nstraints	Significant	constraints	
Dwellings delivered on deliverable sites	3,215	180	x	x	3,395
Dwellings delivered on developable sites	3,111	5,925	6,265	6,782	22,083
Total potential	6,326	6,105	6,265	6,782	25,478

**Table 8:** Summary of potential capacity on deliverable and developable sites in the 17 year

 period 2009–2026 for Hereford City, the Market Towns and Rural Areas

Location				Years 16-17 2024–2026	Total 2009- 2026	Post 2026
	Low co	onstraints	Significant	constraints		
Hereford City	2,249	2,710	3,182	3,281	11,422	4,921
Bromyard	182	39	х	28	249	42
Kington	182	10	х	12	204	18
Ledbury	249	551	х	716	1,516	1,074
Leominster	996	862	433	1,321	3,612	1,980
Ross-on-Wye	509	420	350	504	1,783	756
Rural Areas	1,959	1,513	2,300	920	6,692	1,380
Total	6,326	6,105	6,265	6,782	25,478	10,171
Panel Report indicative average annual rate (five year periods)	3,445 (2x530pa + 3x795pa)	4,845 (2x795pa + 3x1,085pa)	5,740 (2x1085pa + 3x1,190pa)	2,380 (2x1,190)		

#### Housing trajectories

- 4.7.2 Stage 8 of the Government's SHLAA guidance indicates that the housing potential collected from sites assessed for their deliverability and developability may be used to produce a housing trajectory. This identifies how much potential housing can be provided and at what point in the future. It can provide the basis for reviewing the assessment to see whether sufficient sites have been identified and whether further sites need to be sought.
- 4.7.3 A housing trajectory is based upon the Plan, Monitor and Manage approach advocated by PPS3. It is used to track the delivery of housing across the lifespan of Development plan Documents. The trajectory plots:
  - The planned requirement which usually remains constant along the x axis of the graph
  - The monitor line of the trajectory which illustrates actual completions pre 2009 and projected completions post 2009 above or below the cumulative allocation
  - The manage line which represents the revised annual requirement for housing which would be required in order that sufficient housing is delivered to meet RSS figures

#### SHLAA trajectories

- 4.7.4 Based on the findings of the SHLAA, trajectories of housing supply on identified potential deliverable and developable sites are shown in relation to the strategic dwelling provision requirements of the panel report of the RSS.
- 4.7.5 The trajectories show that there is sufficient land available within each of the five year periods. With this in mind this SHLAA can demonstrate that there is more than sufficient land to meet both the RSS panel report housing total of 18,000 dwellings to be provided between 2006–2026, as well as its phasing policies.
- 4.7.6 The trajectories can be found at Appendices 12 and 13.

#### 5.0 CONSULTATION

- 5.1 There has been stakeholder involvement in shaping the methodology and assessing sites contained in the SHLAA. In addition, developers, landowners and the wider public have been invited to bring sites to the Council's attention through a 'call for sites'.
- 5.2 With regards to consultation on the findings of this SHLAA report itself, PPS3 and the Government's SHLAA Practice Guidance do not place a requirement for the Council to consult on the SHLAA report at this stage.
- 5.3 The SHLAA is a technical document which will be used to inform the choice of housing allocation in future development plan documents. It is through the individual development plan process where decisions are taken, using the technical information of SHLAA, where

future challenges should be directed as identified in the advice of the Planning Advisory Service.

5.4 The timetable for the production of the Core Strategy and other DPDs is contained within the Council's Local Development Scheme which is found on the Council's website.

#### 6.0 CONCLUSIONS

- 6.1 The RSS panel report (September 2009) identifies that Herefordshire is required to accommodate 18,000 houses between 2006–2026 of which 8,500 must be provided within Hereford.
- 6.2 Between 2006–2009 a total of 2,180 dwellings were built leaving 15,820 dwellings to be provided by 2026.
- 6.3 The study demonstrates that there is sufficient land available to meet the five year land requirement. There is a requirement to provide 2,855 dwellings between 2009–2014 and the SHLAA demonstrates that there are deliverable sites to deliver 3,215 dwellings.
- 6.4 The SHLAA identifies developable sites to accommodate 22,083 dwellings between 2009–2026.
- 6.5 The SHLAA identifies deliverable sites to accommodate 3,395 dwellings and developable sites to accommodate 22,083 dwellings which together deliver an overall yield of 25,478 dwellings between 2009 2026.
- 6.6 3,395 dwellings can be provided on deliverable sites and 9,036 dwellings can be provided on developable sites with low constraints and 13,047 dwellings on developable sites with significant constraints.
- 6.7 There are sufficient sites identified through this SHLAA to meet the RSS panel report housing figures and the phasing requirement. However, sites that are significantly constrained will be required.

#### 7.0 MONITORING AND REVIEW

- 7.1 The Council will keep the SHLAA up to date. It will be reviewed annually for the following purposes:
  - To update the housing trajectory in the Council's AMR
  - To update the Council's assessment of the 5 year supply of specific deliverable sites for housing
  - To monitor which identified potential sites may have come through the planning process either through the granting of planning permission or through plan making and their development
  - To identify where progress has been made in overcoming identified constraints on identified sites

- To identify new constraints which now may mean a site is no longer deliverable or developable and how this needs to be addressed
- To take account of policy changes at the national, regional or local level
- To reflect changes in market factors or site viability that could impact on the deliverability of sites
- To take account of any new sites
- To include relevant new data of appropriate level of detail as made available.

#### **GLOSSARY OF TERMS**

**Achievability** – 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, and the capacity of the developer to complete and sell the housing over a certain period.

**Allocation** – An area of land identified in a Development Plan. The allocation will indicate the Council's preferred use for the land.

**Annual Monitoring Report (AMR)** – A report produced each financial year to indicate the progress of production of the LDF and effectiveness of policies contained within the plan. The report will outline action that may need to be taken to meet targets or if policies need to be replaced.

**Availability** – 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 multiple ownership, or operational requirements of landowners. This means that it is controlled by a housing developer who has expressed an intention to develop, or the landowner has expressed an intention to sell.

**Brownfield** – Land which is or has been occupied by a permanent building or structures. Also known as previously developed land.

**Conservation Area** – An area of special architectural of historic interest where development is strictly controlled so that its special character and qualities can be preserved or improved.

**Communities and Local Government (CLG)** – The UK government department responsible for setting policy on local government, housing, urban regeneration, planning, fire and rescue.

**Core Strategy** – One of the Development Plan Documents. It sets out the long term vision for Herefordshire and the policies and proposals to deliver that vision.

**Deliverability** - A deliverable site is available now, offers a suitable location for housing development now and there is a reasonable prospect that housing will be delivered on the site within five years from the date of adoption of the plan.

**Density** – A measure of the number of dwellings which can be accommodated on a site or in an area.

**Developable** – A developable site is in a suitable location for housing and there is a reasonable prospect that the site is available for, and could be developed at the point envisaged.

**Development Plan Document (DPD)** – The 2004 Planning and Compulsory Purchase Act requires all Councils are required to prepare Development Plan Documents. These will be included in the Local Development Framework and collectively deliver the spatial planning strategy for the local planning authority's area.

**Employment Land Study** – A study which looks at employment land requirements within Herefordshire for the period up to 2026.

**Flood Zone** – A geographical area designated by the Environment Agency, subject to potential flood damage.

**Greenfield** – Land that has not previously been developed or where the remains of any buildings, roads, uses etc. have blended into the landscape over time.

**Growth Point** – A new Growth Point for Hereford was announced by the Housing Minister in October 2006. As part of its Growth Point status, the city will be expected to deliver 8,500 new houses. The status is also expected to enable support funding to be drawn down particularly in respect of new infrastructure.

**Housing Market Partnership** - A partnership between the Council and house builders, developers and built environment professionals formed to steer the SHLAA.

**Listed Building** – A building or other structure of special architectural or historic interest included on a statutory list and assigned a grade (I, II\*, II).

**Local Development Framework (LDF)** – The Local Development Framework is a nonstatutory term used to describe a folder of documents. It comprises Development Plan Documents, Supplementary Planning Documents, the Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.

**Planning Policy Statement (PPS)** – Planning Policy Statements set out the government's planning policy on various topics.

**Regional Spatial Strategy (RSS)** – The Regional Spatial Strategy is prepared by the regional planning body. It sets out policies in relation to the development and use of land in the region.

**Strategic Flood Risk Assessment (SFRA)** – An assessment of the likelihood of a flooding in a particular area so that development needs and mitigation methods can be carefully considered.

**Suitability** – A site is considered suitable if it offers a suitable location of development and would contribute to the creation of sustainable, mixed communities. Sites allocated in the Herefordshire Unitary Development Plan for housing or with planning permission for housing will generally be suitable. For other sites, policy restrictions, physical problems or limitations, potential impacts and environmental considerations should be considered.

Water Cycle Study – An investigation into the availability of water supply, treatment and infrastructure.

Yield – The potential number of dwellings that can be delivered on a site.

#### APPENDICES

Appendix 1 – List of all settlements surveyed in the SHLAA

Appendix 2 – List of SHLAA Housing Market Partnership members and dates of meetings

Appendix 3 – Publicity material for 'Call for Sites'

**Appendix 4** – List of all moderate and poor Employment Sites as identified in Employment Land Study

**Appendix 5** – Copy of Site Assessment Form used to assess individual SHLAA sites

**Appendix 6** – Copy of Site Schedule used to profile individual SHLAA sites

**Appendix 7** – Viability Assessment information

Appendix 8 – List of all sites with housing completions 2006-2009

Appendix 9 – List of all commitments 2009-2014

**Appendix 10** – Summary table of all developable sites (i.e. suitable and deliverable) for the period 2009–2026 split into Hereford, each of the Market Towns and Rural Settlements.

**Appendix 11** – Summary table of rejected sites for Hereford, the Market Towns and Rural Settlements

Appendix 12 – Trajectory for 5 year supply of deliverable sites 2009–2014

**Appendix 13** – Trajectory for all developable sites 2009–2026