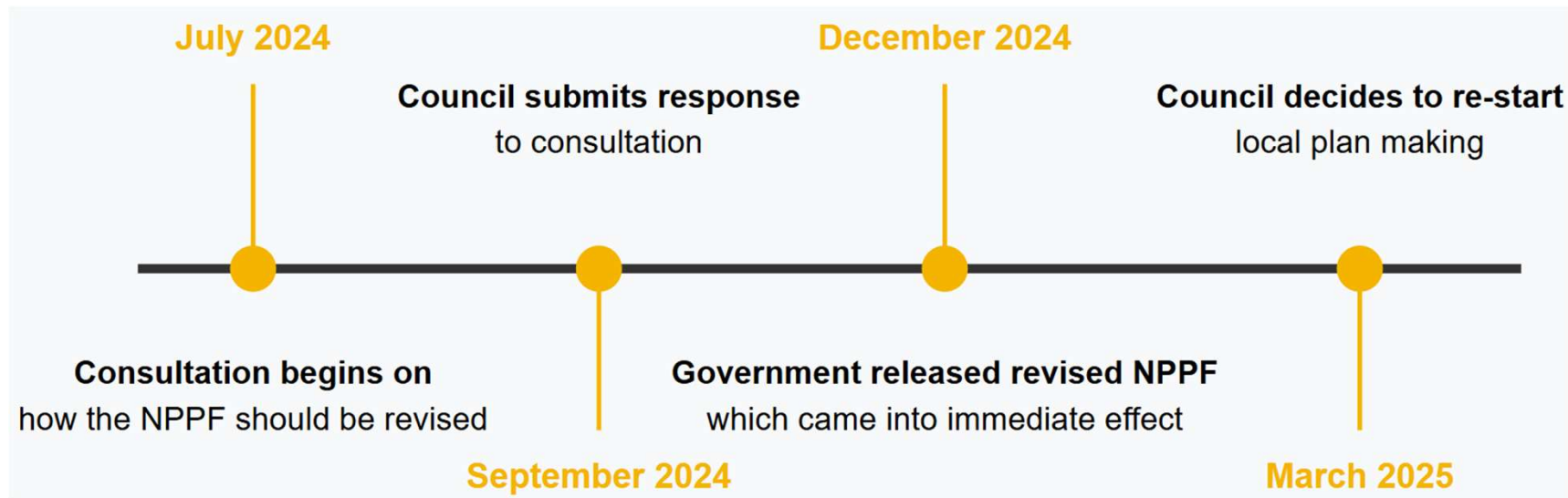


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Local Plan and NDP update

26 March 2025

Overview



Key NPPF Changes and Impacts on Herefordshire

Mandatory Housing Targets:

- The Draft Local Plan 2024 provided for 16,100 homes
- Government target: **27,260** homes over 20-year plan period
- Additional 11,160 homes required (nearly 70% increase)

New Standard Method:

- Uses a % of existing housing stock as baseline
- Applies affordability uplift factor
- Results in significantly higher annual housing need figure

Five-Year Housing Land Supply (5YHLS):

- Council no longer has a 5YHLS
- Previous position: 5.79 years supply
- New position: **3.06 years** supply
- Change took **immediate effect** upon NPPF publication

A new Local Plan



Decision now made to re-start plan making process

Will need to recommission all evidence and new call for sites

Explore new spatial strategy, considering how revised growth figures will be apportioned across county

Will need to be accompanied by sufficient employment land, community facilities and infrastructure provision across county

A new Local Plan will need to be produced under a different regime set out in Levelling Up and Regeneration Act 2023 (LURA)

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LURA Timeline for Local Plan making

Stages	Dates
Preparatory Work and evidence gathering	To be completed by October 25
Gateway 1 Plan Visioning and Strategy Development 8-week consultation	March 26
Gateway 2 Draft Plan 6-week consultation	February / March 27
Gateway 3 Submit	January 28

Implications for Neighbourhood plan making

Protection against speculative development from Lack of 5YHLS (Paragraph, 14):

Five years or less

Contains policies and housing allocations which meet identified housing need

Transitional Arrangement (Annex 1):

NPPF policies apply to NDPs from 12 March 2025

Exception for NDPs submitted under Regulation 15 by this date **(only applies to Dormington & Mordiford, and Woolhope)**

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NDPs under new NPPF

- All plans seeking to review or make an NDP must be in line with new NPPF
- New housing requirements for the county must be factored into plans
- Any new housing requirements will be calculated using new standard method formula based on parish housing stock
- Difficulty in providing a Proportional Growth target due to increased mandatory housing target. Any figure provided could be subject to significant increase at this stage.

Advice moving forward

Apportionment of growth across county first need to set out in a new Local Plan. Recommend to pause on formal stages of NDP making.

Parishes still wishing to progress:

- Will need to request a new housing requirement figure from council based on new standard method formula.
- NDPs moving forward in advance of a new Local Plan will expire in 2031 as Core Strategy provides the policy context.
- Service Level Agreement (SLA) will need to be revised as more resources will be directed towards new local plan. The Council can no longer undertake HRA/SEAs. Likely that NDP groups will need to commission consultants to do so.

FAQs

1. What does the new NPPF (December 2024) mean for Herefordshire Council in its plan making role around housing?
2. What does the new NPPF (December 2024) mean for Herefordshire Council with regard to housing targets?
3. What is a 5 Year Housing Land Supply?
4. What is the 5 Year Housing Land Supply figure for Herefordshire?
5. Does this mean all housing applications will automatically be approved?
6. What is the timescale for producing a new Herefordshire Local Plan in line with the new NPPF (December 2024) guidance?
7. What does the new NPPF (December 2024) guidance mean for Neighbourhood Planning?
8. What does the new NPPF (December 2024) mean for Parishes and Town Councils who wish to begin or continue with a Neighbourhood Development Plan now?
9. Can an NDP still be reviewed?
10. Is the recommendation to pause and wait for Herefordshire Council to decide on their progress with the Local Plan before progressing with an NDP?
11. If a parish does want to progress with its NDP what is required?
12. Can work continue in the background if parishes want to continue?
13. What support will Herefordshire Council provide for NDP's going forward?
14. Will the provision of infrastructure keep pace with these housing numbers?
15. Is the affordability factor different for rural areas?
16. Does this mean that areas in the open countryside are at risk from development?
17. How is a Parish housing need figure calculated and when will these be released?
18. Can excess growth delivered previously in a Parish be taken into account when calculating new growth targets?
19. Does the proportional growth target take account of local services available?

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Support

- FAQs
- Locality
- NDP inbox : neighbourhoodplanning@herefordshire.gov.uk

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Discussion & Questions





Frequently Asked Questions for Parish and Town Councils

March 2025

Re: [National Planning Policy Framework \(NPPF\) December 2024](#)

1. What does the new NPPF (December 2024) mean for Herefordshire Council in its plan making role around housing?

The Government has set mandatory housing targets for councils across England. Targets are no longer advisory, and this level of growth must be accommodated. The new housing target for Herefordshire is **27,260** dwellings over a twenty-year plan period.

The Draft Local Plan has been through its Regulation 18 draft plan consultation, but it only had provision for 16,100 new homes, the new NPPF requires an additional 11,160 homes over the 20-year plan period. Therefore, the council must now go back to the start of the plan making process as a **new strategy must be devised**. We are unable to carry on with the draft plan that was consulted on in 2024 and will now be producing a new Local Plan in line with the new [Levelling-up and Regeneration Act 2023](#) (LURA). The secondary legislation to progress under this system will not be available until later this year.

2. What does the new NPPF (December 2024) mean for Herefordshire Council with regard to housing targets?

The significant increase in the revised housing target for Herefordshire takes immediate effect. It means the current supply of housing in the county falls short of the new need target. This means the level of planning commitments, allocations and potential housing sites coming forward are not enough. Therefore, if the Council is unable to demonstrate that it is able to meet its housing target then it **does not have a Five-Year Housing Land Supply** (5YHLS).

3. What is a 5 Year Housing Land Supply?

In order to try to maintain the delivery of new homes, national policy in England requires Local Authorities to have a supply of deliverable sites. Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement, in other words, a Five-Year Housing Land Supply. A supply of *5.00 years* and above is when there is a supply but anything at or below *4.99 years* is when there is not a supply.

4. What is the 5 Year Housing Land Supply figure for Herefordshire?

Prior to the NPPF December 2024 update, Herefordshire had a 5YHLS of 5.79 years, however the implementation of the new housing targets has meant that the recalculation of the Herefordshire [Five Year Housing Land Supply Document January 2025](#) now sits at **3.06 years**. To demonstrate five years' worth of deliverable housing sites, robust, up-to-date evidence needs to be available. The supply is calculated annually, and the results are available annually in the autumn.

5. Does this mean all housing applications will automatically be approved?

No. When an authority cannot demonstrate a five-year supply of housing land, all of its development plan policies for delivering housing are deemed out of date. The NPPF states that planning applications should instead be decided based on the presumption in favour of sustainable development.

Paragraph 11(d) of the NPPF must be applied in this situation. While there is a presumption in favour of sustainable development, applications can still be refused if:

- The application is in conflict with specific NPPF policies that protect areas or assets of particular importance such as habitats sites, National Landscape (formally Areas of Outstanding Natural Beauty), Local Green Space, Sites of Special Scientific Interest, heritage, assets of archaeological interest and areas at risk of flooding.
- The adverse impacts would significantly and demonstrably outweigh the benefits when assessed against NPPF particularly on 'key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes'
- The area has a Neighbourhood Development Plan and NPPF Paragraph 14 is applicable.

6. What is the timescale for producing a new Herefordshire Local Plan in line with the new NPPF (December 2024) guidance?

The council is now going back to the start of the plan making process and will be producing a new Draft Local Plan under the Levelling Up and Regeneration Act 2023. This will allow the council to plan for the new level of growth required by the mandatory housing targets.

Progressing a local plan under the Levelling Up and Regeneration Act 2023 plan making system, with secondary legislation due to be published in Autumn 2025, means that timescales can only be broadly set out. However, submission of the plan at the start of 2028 is timetabled as the likely possibility. This system comprises of three Gateways in a 30-month end to end process and once further guidance is available a more structured programme will be made available.

7. What does the new NPPF (December 2024) guidance mean for Neighbourhood Planning?

Neighbourhood Development Plans (NDPs) form part of the wider Development Plan Scheme for Herefordshire. Given that the 5YHLS falls below 5 years, Paragraph 11(d) of

the new NPPF is applicable to NDPs in decision making. However, NPPF paragraph 14 provides the following additional guidance:

In situations where the ‘presumption in favour’(at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) *the neighbourhood plan became part of the development plan **five years or less** before the date on which the decision is made; and*
- b) *the neighbourhood plan contains **policies and allocations** to meet its **identified housing requirement** (see paragraphs 69-70).*

This means that for made plans that contain policies and site allocations to help meet their identified housing requirement, and which **are less than five years old**, paragraph 14 of the NPPF allows the decision maker to attach significant weight to the Neighbourhood Plan, even when the council cannot demonstrate a five-year housing land supply.

For parish groups with plans that are less than 5 years old; meet both criteria a and b of paragraph 14, their NDP will be a significant material planning consideration when assessing the principle of future housing developments in the Designated Neighbourhood Area.

Where NDPs are **older than 5 years** from December 2024, then the NDP is out-of-date and paragraph 11d of the NPPF is what the decision maker must determine the application against particularly for housing provision.

8. What does the new NPPF (December 2024) mean for Parishes and Town Councils who wish to begin or continue with a Neighbourhood Development Plan now?

The NPPF has a set of transitional arrangements for areas of planning that are not set to change to the new guidelines with immediate effect. In terms of NDPs the plan making transitional arrangements are as follows:

For neighbourhood plans, the policies in this Framework will apply for the purpose of preparing neighbourhood plans from 12 March 2025 unless a neighbourhood plan proposal has been submitted to the local planning authority under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended) on or before the 12 March 2025. NPPF Annex 1, paragraph 239.

Therefore, the NDP must have completed a Regulation 14 consultation at the time of publication of the new NPPF December 2024. A full analysis of the Regulation 14 consultation information must be drafted along with other updated documentation in preparation for Regulation 15 submission. The preparation of this documentation requires input from the Herefordshire Council planning team, such as production of maps and other assessments, therefore communication with the department regarding this must be taken into account and be factored into timelines. Thereafter, to be ready for this stage, known as Regulation 15, the following documentation would be required to be submitted to the Council to be considered for Regulation 16 consultation:

The submission must include:

- Policies Maps for the Final Neighbourhood Development Plan
- a ‘consultation statement’

- a 'basic conditions statement'
- an (SEA) Environmental Report
- Appropriate Assessment
- A Statement of Modifications (only applicable to reviewed NDPs)

9. Can an NDP still be reviewed?

Any reviews going forward must be amended in line with the new NPPF (December 2024). The type of review required will depend on the changes you wish to make (see the Herefordshire Council [NDP guidance note on review of NDPs](#) for further detail). There are three main types of review:

Minor

A minor (non-material) modification is for typographical errors or adding information for clarification and does not result in any changes to the policy stance or interpretation. It is a simpler process and requires no consultation, examination or referendum. This, however, would not be classed as 'remaking' your NDP and therefore, the adoption/made date of the original plan would remain the same.

Material Modification

A material modification would be considered as a change which does not alter the overall strategy of the plan but adds additional details to the existing policies. This method would require a Regulation 16 consultation to be undertaken and an examination. The parish council and Herefordshire Council need to submit a statement to the examiner indicating whether they consider the modifications to be of a material or substantial nature. This may require a referendum or could progress straight to being 'made' dependant on the examiners decision.

Substantial Modification

If you are considering including additional site allocations, a new or changes to a settlement boundary or new policy areas, then this would constitute a substantial review. The plan would be required to follow the same process as your first neighbourhood plan i.e. Regulation 14, Regulation 16, examination and referendum. The plan will require a successful referendum result in order to be made.

10. Is the recommendation to pause and wait for Herefordshire Council to decide on their progress with the Local Plan before progressing with an NDP?

Yes, the recommendation is to pause on NDP drafting. The 27,260-housing target must be apportioned at a strategic level across the city, towns and rural areas and ultimately be in line with the new Local Plan. There is an emphasis on sustainable locations for growth as part of the new NPPF and this needs to form part of the options for growth in the new Local Plan. Further consultations on spatial options will be undertaken to determine how this growth will be planned for.

11. If a parish does want to progress with its NDP what is required?

Any group wishing to progress their NDP will need to take into account the NPPF December 2024 and the significant change in circumstances that affects housing

requirements. Therefore, the authority can only provide an indicative housing need figure ahead of its own apportionment across the county if requested to do so. The need figure will be based on the best available housing need figure at the time of the request. This will be based on the latest information on housing stock for the parish. The standard method formula used to calculate the countywide need figure will be applied to parish level.

This figure could be subject to a further increase as until such time as the council has undertaken detailed work to inform potential strategies and growth apportionment, the level of growth for individual parishes will not be known. Therefore, the parish standard method figure may mean there is too much uncertainty at this point in time and you may not wish to proceed on this basis.

12. Can work continue in the background if parishes want to continue?

There may be scope for groups to do background work in preparation for future drafting of an NDP but undertaking formal stages of consultation are not recommended. The only exception being for those that have reached Regulation 15 as per the transitional arrangements.

13. What support will Herefordshire Council provide for NDP's going forward?

While a dedicated Neighbourhood Planning team no longer exists, each member of the Strategic Planning team understands Neighbourhood Planning and will work with parishes across Herefordshire to ensure that there is a continuing level of support. Officers will be available to answer questions and conduct scoping reports in the first stages of plan development. They will then support the NDP group through the various stages of plan production, such as checking for conformity and organising consultations as has been done in the past. [The Service Level Agreement \(SLA\)](#) for parishes has now been updated and one important change is that Herefordshire Council are no longer able to provide SEA and HRA assessment of draft NDPs. Currently, there is technical support funding available for external parties to complete these assessments and you can find out more about funding for NDPs on the [Localities website](#).

14. Will the provision of infrastructure keep pace with these housing numbers?

Once the target has been apportioned at a strategic level across the city, towns and rural areas then it will be clear what the infrastructure requirements will be. An Infrastructure Delivery Plan will be produced and sit alongside the Local Plan.

15. Is the affordability factor different for rural areas?

The affordability factor in the standard method need calculation is based on a set ratio covering the entire authority area, this does not differentiate between the city, towns or rural areas.

Going forward, the council is applying for the county's rural areas to be subject to a "Rural Area" designation under the Housing Act, which would allow for lower site size thresholds (below 10) to trigger the requirement for affordable housing units, subject to viability testing.

16. Does this mean that areas in the open countryside are at risk from development?

Areas outside of the settlement lists in figures 4.14 and 4.15 of the Core Strategy remain classed as open countryside in planning policy terms. However, the council's lack of a 5 year housing land supply does now mean that the presumption in favour of sustainable development is employed when determining applications, and adopted policies relating to housing distribution are to be considered out of date. Therefore, locations considered sustainable under NPPF definitions may be subject to residential planning approvals.

A new rural settlement hierarchy will be formulated in the new Local Plan, outside of which will be considered open countryside.

17. How is a Parish housing need figure calculated and when will these be released?

This will be calculated using the new standard method that was used for the county, but instead using the baseline figure of 0.8% of existing housing stock within the Parish boundary. The figure returned will likely be higher than previously under this new method.

This can be requested at any time via email

18. Can excess growth delivered previously in a Parish be taken into account when calculating new growth targets?

No. This has to be treated as a new target as the NPPF indicates that it should be the latest evidence of housing need. Delivery and commitment of units that occur from the start of the plan period (1st April 2025) can be factored in.

19. Does the proportional growth target take account of local services available?

Sustainable development is emphasised in the NPPF. So likely the settlements with more services available will be the focus for future growth in the Local Plan 2025 - 2045.

For further queries please get in touch:
neighbourhoodplanning@herefordshire.gov.uk



Parish Local Plan & NPPF Update Combined Sessions

March 2025

Questions and Answers

Our NDP has a year left before it expires, will it still be relevant under the new NPPF?

Yes, your NDP qualifies for safeguarding. Under the new NPPF it still carries weight as it still in date.

Will the new target be based on the parish as a whole or settlement and if settlement, what will the threshold be for defining a settlement?

Calculating it based on the parish, rather than a settlement.

Does this mean all parishes will have a housing target to reach, no matter where in the County, and how sustainable it is considered to be in relation to transport etc?

Will have settlements not listed in the Core Strategy. But will be dealt with as open countryside.

Will the new increased targets be matched with infrastructure capacity, especially sewerage and drinking water supply? Including local services? 5

Currently being commissioned as an important part of the Local Plan evidence base is a Water Cycle Study, which will be produced in cooperation with the Environment Agency and the water companies to determine where and what upgrades to supply and drainage infrastructure will be required over the plan period.

Sustainable development is emphasised in the NPPF. So it is likely that the larger, more sustainable settlements, will be the focus for a larger proportion of growth.

What does the affordability uplift factor mean for rural areas?

The affordability factor is based on a county-wide ratio. This is based on the relative affordability of housing compared with incomes locally.

Will there be grants for NDP reviews? Will Parishes meet the specialist consultant cost of NDP preparation, or will there be financial assistance available as there was at the start of the parish plan process?

Locality have provided grants for many years now. Please keep an eye on this webpage for updates and when you are able to apply: [Grant Funding - Locality Neighbourhood Planning](#)

If you will not have a Local Plan until 2028, what does this mean for an NDP made in 2022?

What impact will this have on its weight in planning decisions?

Where an NDP is over 5 years since it was made' it has less weight in the decision making process. Only housing supply policies won't have much weight, environmental policies and community policies will still be weighted.

When will the council release new growth figures for Parishes? (Will we need to reverse engineer these numbers into our NDP, what are the time scales after we have requested for the figures?)

Parishes will need to individually contact us to receive your target figure if you wish to proceed before we have developed the countywide strategy. You should receive a response within a few days. Once you send a request we will calculate those figures based on the new NPPF standard method and it is highly likely to be a higher figure than you had before. The advice is to pause and wait for apportionment within the Local Plan.

Our NDP is over 5 years old does it have any weight?

Where an NDP is over 5 years since it was made' it has less weight in the decision making process. Only housing supply policies won't have much weight, environmental policies and community policies will still be weighted. There is a threat of speculative development where the NDP is over 5 year since it was made'.

Please can you explain how local housing targets are calculated (i.e. for a Parish)

A methodology can be provided, using council tax figures. This calculation is also adjusted to reflect five-year average affordability ratios within the county.

How will HCC demonstrate economic demand for this level of new housing? Also should we be building in demographics leading to demand type to ensure we build the right type/size of housing 2

We are going to commission a new Housing Market Needs Assessment (HMNA) which will look into the needs for all types of housing such as affordable, student housing and children's homes. This study will also look at house types.

What's your definition of a sustainable area - what's needed to support development?

The NPPF place a requirement for Council's, in exercising their local plan and decision taking functions to achieve sustainable development. The more sustainable a settlement, the more services, facilities, public transport and active transport links are available.

Is Housing Association housing being progressed by the Council?

The housing association housing is still in its early stages so no further updates are available at this stage.

How is the emphasis in allowing development to go ahead changing when now looking at planning applications? What does speculative risk mean in practice?

The lack of a 5 year supply will be a consideration in determining planning applications and at appeal.

In the context of your LP timetable, what's the best advice for Parish Councils on when it is most sensible to start an existing NDP review? Are parishes best advised to wait until the new LP is made or should we start at the 'Gateway 2' stage?

The Local Plan is aiming to go out to a consultation in Spring 2026. At this stage there will be some level of certainty with the proposals within the plan. At this point parishes could start on background work but undertaking formal stages of consultation is not recommended. Once the plan has been submitted formally for examination (gateway 3) then more formal stages for NDPs could begin. Once the Local Plan is adopted then the adoption of NDPs against this new plan can begin.

As we have exceeded our 2031 target, will this provide a cushion against further development, allowing time for issues with an overburdened and in some cases and inadequate infrastructure be addressed?

No it cannot be used as a cushion. Planning applications will still need to be determined on a case by case basis. If statutory providers have issues with infrastructure then that will need addressing before an application can be considered.

Is land defined as open countryside at risk from new build.

RA2 settlements will be the focus for proportionate growth with non-identified settlements continuing to be open countryside. There may be some risk of speculative applications whilst the Council cannot demonstrate a 5 year housing land supply. This could be the case for areas on the edge of settlement boundaries.

How about more doctors, medical facilities & hospital capacity before we have to accommodate more people.

Central government sets the housing targets that we have to accommodate. As part of planning applications the Council assesses whether there is capacity in local services and facilities. Where capacity does not exist then contributions can be sought to offset the additional pressures new development would create.

With council elections in May 27, how vulnerable is the Local Plan to late changes?

The aim is to progress with the Local Plan towards Examination where it is sufficiently advanced to reduce the need to make major alterations.

Will you have the capacity to deal with c100 NDP reviews in 2028?

All of the Strategic & Neighbourhood Planning Team will be sharing the task of supporting NDPs at this time. Each NDP area will have an identified support officer.

With the changes in climate expected to get worse, we currently suffer from frequent flooding sometimes preventing residents getting in/out of the village. Have you future-proofed expected climate changes in the next 3 years into our local housing targets?

Evidence base information, including the Strategic Flood Risk Assessment and the new Environment Agency flood risk maps, which take climate change into account will all be considered when looking at sustainable areas for future growth.

Query whether River Wye SAC and the implications on this.

The LP will need to assess the implications and find solutions to mitigate the impact of additional housing growth.

Will RA3 Villages still be considered as a constraint?

We are working on a new settlement hierarchy, but settlements outside the current rural settlement hierarchy are still classed as Open Countryside.

Can HC provide further help on NDP on design codes being produced?

NDP are expected to play a strong role in design. We will need to review what support Herefordshire Council can provide to support parishes in this approach. There is no urban design officer within the council. The main focus for HC will be with progressing the Local Plan. Parishes can start to explore design ideas in their own areas with character assessments. The [National Model Design Code - GOV.UK](#) is a good starting point for parishes interested in this area. [Design : Midlands](#) is a group that may be able to assist further.

What happens if a parish has a large % growth of housing more recently will that be taken into account with the new figures?

No previously oversupply of housing cannot be taken into account. Will need to assess it as a new target.

What are the implications for HCC failing to hit its new housing targets?

As part of the new local plan the Council will need to plan for the delivery of sufficient homes. If sufficient allocations are not made in the local plan then the plan can be found unsound. Which would require it to recommence or indeed special measures.

Ashperton was designated for proportionate growth in the CS but in drafting the new LP it was acknowledged that the parish was NOT a sustainable location after all. Where does this leave us with speculative development?

Until a new Local Plan is adopted, planning proposals will continue to be assessed against the Core Strategy. Ashperton will still be considered under Policy RA2 of the CS. Due to the age of

NDPs and the lack in 5YHLS, proposals will be assessed against NPPF paragraph 11d 'presumption in favour of sustainable development'.

We are investing in nature recovery across the parish. This is to address the impact of recent development. Should we put this work and investment on hold, or can nature recovery plans be factored into any revised NDP?

There is no need to put this work on hold as it is separate to the Local Plan. There will be reference and support for Local Nature Recovery Strategies in the future Local Plan and LNRS can be referenced in NDPs. The NPPF states that "where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.

Is there going to be a process where we can provide our points of view into the plan visioning and strategy?

At the start of this process. New guidance on the LURA has not yet been released, which we would need to understand. However, we would need to get feedback and involvement (early engagement) for parishes to be involved. Significant amount of evidence will need to be instructed to inform the new Local Plan. There isn't a definitive list that has been published.

What is the min size development that avoids any parish gain? Too many developers are going for stages of build and avoiding parish gain.

The now shelved LP had reference to designated rural areas. This would give us the choice to impose a lower affordability threshold, but needs to be viability tested.

Where a settlement of 10,000+ homes gets lots of funding. Is this a better approach than piecemeal development in the parishes?

That level of growth would be significant and is likely to be focused in Hereford to bring forward the bypass. Therefore opening Hereford up for growth. Any new settlement would need to be accompanied by necessary infrastructure. This could be funded through Section 106 agreements or and infrastructure levy. A site needs to be deliverable when it comes to examination in public. MHCLG would give infrastructure funding for a new settlement of 10,000 dwellings or more.

Could Hereford accommodate the whole housing target increase? Will the bypass help to deliver housing?

Facilities and services would need to be delivered where housing increases requires it. The uplift in housing figures would not solely be direct to just Hereford. The bypass cannot come forward as a standalone scheme as it would need to be accompanied by growth.

I understand that the housing target is now a Government expectation and not just advisory. What impact will that have on the planning dept. Will the Hereford Council be able to cope with the increased workload in the next few years?

There will be a need to progress the Local Plan to plan for the new mandatory housing target. The timetable for this work is tight as it is based on the Levelling Up and Regeneration Act 2023 which is a 30 month timetable, once formal commencement begins.

What are the current expectations for the Three Elms development, given its hydrological issues with the commercial aquifer and increased flood issues for the city of Hereford?

The new local plan will be informed by a significant number of evidence base documents that will fully consider the constraints affecting the plan area, including flooding.

Withington is going to be on the effected due to it being on the corridor to Hereford.

The distribution of development has not yet been determined at this stage. The new local plan and the options for distribution of development will be informed by a number of evidence base documents. This will include transport modelling.

Is there a risk that exceeding past growth targets will simply result in higher % growth targets?

The new housing figures are calculated on the basis of number of dwellings within the parish, which is taken from Council tax data and subject to an affordability ratio adjustment.

Am I right in thinking the previous plan had a lower threshold for affordable housing - will this be carried into new plan?

Yes the previous plan did consider a lower threshold in certain areas. As there is a much higher housing target, there will need to be a revision and retesting of viability scope for the new plan. This will need to incorporate accompanying infrastructure requirements.

The LTP, will it focus on Hereford, should it not take into account the rest of the County?

The LTP looks at the whole county for all forms of transport. The work being done by highways team will be factored in when we progress on the new local plan.

Should a parish decide to do an NPD or review existing one who can they find a consultant to help? ours has retired.

The Royal Town Planning Institute has a list of planning consultants that can be contacted. Consultants can be searched for based on a postcode. This search facility can be accessed via the following weblink:

[The RTPi Directory of Planning Consultants](#)

It may be helpful to liaise with other parishes for recommendations also.

This is obviously a hot topic for Parishes, can we have further updates as work progresses? Thank you, very helpful session this morning, it is appreciated.

The Council is intending to provide further updates in the future. However, we are awaiting secondary legislation and guidance to be published by central government, which is expected in Autumn 2025. This will provide HC with the necessary direction to take the next steps.

What system will be used for the consultation process?

A consultation platform is being reviewed for the purposes of consultation.

Our parish is not identified as a sustainable settlement in the now shelved Local Plan. We are now back to the Core Strategy which identifies it as a sustainable settlement that can accommodate proportionate growth.

No weight to be afforded to the now shelved Local Plan.

Can the Local Authorities put pressure on the government to include bringing empty dwellings back into use as part of their calculations? They should incentivise landlords to upgrade empty properties. According to the last census Leominster has 500 empty dwellings which could be lived in with the right carrot and stick!

Strategic housing team are looking at this. Further information on this can be found on the HC website here: [Help us to take action on empty homes – Herefordshire Council](#)

The government has stated their housing targets, however the council plan is due to be submitted in 2028. what will be interim situation when we as a county are not deemed to be compliant with government policy.

The timescale has been provided and would be compliant with government policy

Are there plans to encourage developers/landowners to release commercial land? If there is no more commercial land, we cannot provide employment for new people.

A key part of the local plan will be to assess requirements for employment land and to consider options for additional employment. This assessment will also look at existing employment land to identify any underused / not coming forward for development.

Yes, an upcoming call for sites will seek land for commercial development as well as residential and other uses. Agreed it will be necessary for the Local Plan to allocate land for employment uses alongside the housing growth.

When will apportionment figures be available?

It could be March 2026 we may be able to indicate how this might work. However, the secondary legislation for new Local Plan making under the Levelling Up and Regeneration Act 2023 will not be available until Autumn 2025. Therefore we are not entirely clear what the steps for plan making under the new system.

I believe you identified area for development by a point system - those without amenities , small villages no development , will some development be allowed now, to share the pressure ?

It will have to be updated.

Will a parishes position in the rural settlement hierarchy in the new LP be the same as in last years draft LP

It depends, information will be updated. Will be revised and reviewed.

Will the shortfall or over delivery in current targets be carried forward for each parish? perhaps 2 variations for each parish, one with bypass one without?

No. This has to be treated as a new target as the NPPF indicates that it should be the latest evidence of housing need. Delivery and commitment of units that occur from the start of the plan period (1st April 2025) can be factored in. As part of the Local Plan evidence some transport modelling work is being undertaken, which will test a variety of development scenarios and their impact on the transport network, including with or without the introduction of a bypass. I would however say that the bypass is a cabinet priority, and will therefore be something the Local Plan will need to accommodate in its overall development strategy.

Is there scope for a brownfield register as part of the new plan? The government originally said it was going to prioritise brownfield before greenfield was built on.

There is a brownfield register, the county does not have much brownfield land unlike other parts of the country.

5yr HLS, previous years have been close to 5. What work is going on in council to get the figure back to over 5 years.

Due to the government target increase, this has automatically dropped the supply. Planning applications must be determined on their merits against out of date housing policies (where plans are older than 5 years). This will take time and cannot be resolved in any quick fix way by HC. The annual target is far higher than past delivery rates making this a very difficult issue to resolve.

We have an NDP in place. If a developer wanted to build in our parish outside of the NDP approved areas, could we use the Local plan timetable (submit Jan 28) as an reason for not supporting the application?

It will be easier to use this argument as the Local Plan gains more weight and is further down the line towards adoption. Unfortunately, It will be difficult to use this argument at this stage.

Will any authority changes (if HC joins with Worcestershire or Shropshire for instance) mean even greater target allocation for us and therefore even more change?

It is early days, and we are not sure how this will be implemented. All neighbouring authorities have an increase, discussion will have to be had.