



## 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.