



# Updated Summary Proof of Evidence of Ben Pycroft BA(Hons), Dip TP, MRTPI in relation to Housing Land Supply

Mixed use development, including up to 625 new homes –  
Land North of Viaduct adjoining, Orchard Business Park,  
Ledbury, Herefordshire, HR8 2QY

for Bloor Homes Western

Emery Planning project number: 20-021

PINS ref: APP/W1850/W/20/3244410

LPA ref: 171532



Project : 20-021  
Site address : Land North of Viaduct  
adjoining, Orchard  
Business Park, Ledbury,  
Herefordshire, HR8 2QY  
Client : Bloor Homes Western  
Date : 15 September 2020  
Author : Ben Pycroft

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## 1. Introduction

- 1.1 This summary and my main proof of evidence are submitted on behalf of Bloor Homes Western (i.e. the Appellant) in support of its appeal against the decision of Herefordshire Council to refuse to grant outline planning permission for a mixed use development including the erection of up to 625 dwellings at land north of the viaduct, adjoining Orchard Business Park, Ledbury, Herefordshire (LPA ref: 171532).
- 1.2 This summary and my main proof of evidence specifically address matters relating to housing land supply. Both documents have been updated to reflect the Council's latest housing land supply position at 1<sup>st</sup> April 2020. They should be read alongside the proofs of evidence prepared by Mr Stacey, which addresses affordable housing and Mr Wakefield, which deals with all other planning matters in relation to the appeal.

### Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and public inquiries across the country.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.6 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents.

## 2. Herefordshire's five year housing land supply

- 2.1 From the outset, Herefordshire Council accepts that it cannot demonstrate a five year housing land supply against its adopted housing requirement and a 20% buffer. At 1<sup>st</sup> April 2020, the Council claims that it has a deliverable five year supply of 5,430 dwellings, which against its adopted housing requirement plus 20% buffer equates to **3.69 years**.
- 2.2 On the requirement side, the Herefordshire Local Plan Core Strategy (adopted 16<sup>th</sup> October 2015) is just less than five years old. Therefore, in accordance with paragraph 73 of the Framework, the five year housing land supply should be measured against the housing requirement set out in policy SS2. The housing requirement is 'stepped' with 850 dwellings per annum to be delivered in 2020/21 and 900 dwellings per annum to be delivered in 2021/22 to 2024/25. This means that the 'base' five year requirement is 4,450 dwellings.
- 2.3 The Council has failed to deliver against its housing requirement in previous years. At 1<sup>st</sup> April 2020, the shortfall against the stepped requirement is 1,675 dwellings. This should be addressed in full in the five year period (i.e. the 'Sedgefield' method). The five year requirement at 1<sup>st</sup> April 2020 is therefore 6,125 dwellings (i.e. 4,450 plus 1,675 dwellings).
- 2.4 In addition, the supply to be demonstrated should include an additional buffer. Paragraph 73 and footnote 39 of the Framework explain that the 20% buffer will apply where the Housing Delivery Test (HDT) result indicates that delivery was below 85% of the requirement. The latest (2019) HDT result was 80%, which means that the 20% buffer applies. The five year supply to be demonstrated is therefore 7,350 dwellings (i.e. 6,125 dwellings plus 20%).
- 2.5 On the supply side, as above, the Council claims that the deliverable supply is 5,430 dwellings.
- 2.6 I have assessed the supply and conclude that 1,312 dwellings should be removed from the Council's supply of 5,430 dwellings for the following reasons:
- **150 dwellings** should be removed from a site with full planning permission at Barons Cross Camp because there is clear evidence the full planning permission will not be implemented. Whilst a further reserved matters application has been made, it cannot currently be determined because the site is within the River Lugg catchment area. No evidence has been provided to demonstrate how this issue will be addressed. Therefore there is not clear evidence that housing completions will begin on this site within five years.

- **401 dwellings** should be removed from sites with outline planning permission for major development because the Council has not produced clear evidence that housing completions will begin on these sites within five years;
- **61 dwellings** should be removed from sites with a resolution to grant planning permission at the base date because the Council has not produced clear evidence that housing completions will begin on these sites within five years.
- **171 dwellings** should be removed from the strategic allocated sites because the Council has not produced clear evidence that housing completions will begin on these sites within five years;
- **329 dwellings** should be removed from the sites allocated in the Neighbourhood Plans because the Council has not produced clear evidence that housing completions will begin on these sites within five years; and
- **200 dwellings** should be removed from the windfall allowance because the Council has not provided compelling evidence that completions on windfall sites will exceed past trends despite the issues surrounding development in the River Lugg catchment area.

2.7 A list of the disputed sites is appended to this summary proof of evidence.

2.8 This means that the deliverable supply is **4,118** dwellings. Against the housing requirement and a 20% buffer, this equates to **2.8 years**. This includes 136 dwellings at the appeal site, which are included in the Council's five year supply. If the appeal site is excluded, the deliverable supply would reduce to 3,982 dwellings, which would equate to **2.71 years**. The position is summarised in the following table:

	<b>Requirement</b>	<b>With appeal site</b>	<b>Without appeal site</b>
A	Five year requirement at 1 <sup>st</sup> April 2020	4,450	4,450
B	Past shortfall at 1 <sup>st</sup> April 2020	1,675	1,675
C	Amount of past shortfall to be addressed in the five year period	1,675	1,675
D	Total five year requirement (A + B)	6,125	6,125
E	Requirement plus 20% buffer (D + 20%)	7,350	7,350
F	Annual requirement plus buffer (E / 5 years)	1,470	1,470
	<b>Supply</b>		
G	Five year supply 1 <sup>st</sup> April 2020 to 31 <sup>st</sup> March 2025	4,118	3,982
H	Years supply (G / F)	<b>2.8</b>	<b>2.71</b>

2.9 The implication of this is addressed by Mr Wakefield.

### 3. Appendix 1 – Disputed sites

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
A04	Barons Cross Camp, Cholstry, Leominster	150	<ul style="list-style-type: none"> <li>The site has a long planning history. Outline planning permission was granted 14 years ago.</li> <li>Whilst a reserved matters application for 414 dwellings was approved in February 2018, that permission was not implemented and Keepmoat has withdrawn its interest in the site due to viability issues.</li> <li>At the base date, the site had detailed consent but there is clear evidence that the permission would not be implemented. The site should therefore be removed from the deliverable supply.</li> <li>A further reserved matters application was made by Persimmon Homes in October 2019 (LPA ref: 193754/RM) and is pending determination.</li> <li>However, the site is within the River Lugg Catchment area. Therefore, it is not known whether the current reserved matters application can be progressed and if it can how the River Lugg issue is to be addressed for this specific site. On that basis, there is not clear evidence that housing completions will begin on site within five years. The site does not meet the definition of "deliverable" and therefore should be excluded from the supply. This results in a deduction of 150 dwellings.</li> </ul>	0	150
B01	Land to the north of the village hall, Ashperton	10	<ul style="list-style-type: none"> <li>This site has outline planning permission for 10 dwellings (LPA ref: 152041). Whilst a reserved matters application has been made, it is pending determination (LPA ref: 191013), the site is located within the catchment area of the River Lugg and therefore there are issues in relation to phosphates.</li> <li>The Council has not provided clear evidence that housing completions will begin on this site within five years. No details of how the phosphate issue for this specific site have been provided by the Council and therefore it is unclear as to whether it can progress. The site should be removed. This results in a deduction of 10 dwellings.</li> </ul>	0	10
B02	Land at Stonehouse Farm, Bromyard	10	<ul style="list-style-type: none"> <li>This site has outline planning permission for 10 dwellings (LPA ref: 172115). Whilst a reserved matters application has been made, it is pending determination (LPA ref: 201450), the site is located within the catchment area of the River Lugg and therefore there are issues in relation to phosphates.</li> <li>The Council has not provided clear evidence that housing completions will begin on this site within five years. No details of how the phosphate issue for this specific site have been provided by the Council and therefore it is unclear as to whether it can progress. The site should be removed. This results in a deduction of 10 dwellings.</li> </ul>	0	10
B05	Land at the Orchard House, Credenhill, Hereford	69	<ul style="list-style-type: none"> <li>As set out on page 66 of the 2019 Framework, the onus is on the Council to provide "clear evidence" that housing completions will begin on this site in the next five years.</li> <li>The comments in the position statement are not clear evidence that housing completions will begin on this site within five years.</li> <li>Paragraph 68-007 of the PPG provides some examples of the types of evidence that could be provided as I discuss below.</li> </ul> <p><b>Current planning status?</b></p> <ul style="list-style-type: none"> <li>The site has outline planning permission. An application for reserved matters has not been made.</li> </ul>	0	69

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<p><b>Firm progress being made towards the submission of an application?</b></p> <ul style="list-style-type: none"> <li>There is no evidence that firm progress is being made towards the submission of a reserved matters application. Appendix 2 of the position statement simply states that there is interest in the site and an application for reserved matters is "anticipated shortly".</li> </ul> <p><b>Written agreement between the LPA and the developer confirming their anticipated start and build-out rates?</b></p> <ul style="list-style-type: none"> <li>A written agreement between the LPA and a developer has not been provided. A written agreement with a developer cannot be provided because the site needs to be sold first.</li> </ul> <p><b>Firm progress with site assessment work?</b></p> <ul style="list-style-type: none"> <li>The outline planning permission was granted subject to 29 conditions, including pre-commencement conditions. No evidence of firm progress with any of the site assessment work required to discharge the conditions has been provided.</li> </ul> <p><b>Clear relevant information about viability, ownership constraints or infrastructure provision?</b></p> <ul style="list-style-type: none"> <li>The Council has not provided any details in terms of viability, ownership constraints or infrastructure provision. Given the recent Covid-19 pandemic, the Council would need to demonstrate that the site is viable.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>In summary, the Council has not provided any "clear evidence" of the type referred to in paragraph 68-007 of the PPG that housing completions will begin on this site within the next five years. The evidence that it has provided is not "clear evidence that housing completions will begin on site within five years. The site fails to meet the definition of "deliverable" as set out on page 66 of the Framework. It should be removed. This results in a deduction of <b>69 dwellings</b> from the Council's supply.</li> </ul>		
B06	Land at Old Potato Store, Mill Lane	10	<ul style="list-style-type: none"> <li>This site has outline planning permission for 10 dwellings. A reserved matters application has not been made</li> <li>The position statement simply states: "A remaining two years left on the permission. Discussions with potential purchasers underway. Site is expected to be available in 12 months time"</li> <li>This is not clear evidence that housing completions will begin on this site. The site should be removed. This results in a deduction of <b>10 dwellings</b>.</li> </ul>	0	10
B08	Land at the Paddocks, Roman Road, Hereford	50	<ul style="list-style-type: none"> <li>The site has outline planning permission for up to 50 no. dwellings. A reserved matters application been made but this is for 42 dwellings (LPA ref: P201175/RM). There is no clear evidence that an additional 8 dwellings will be constructed on this site in the five year period. These dwellings should be removed. This results in a deduction of <b>8 dwellings</b>.</li> </ul>	42	8
B09	Land east of Canon Pyon Road, Hereford	95	<ul style="list-style-type: none"> <li>As set out on page 66 of the 2019 Framework, the onus is on the Council to provide "clear evidence" that housing completions will begin on this site in the next five years.</li> <li>The comments in the position statement are not clear evidence that housing completions will begin on site within five years.</li> <li>Paragraph 68-007 of the PPG provides some examples of the types of evidence that could be provided as I discuss below.</li> </ul>	0	80



EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<p><b>Current planning status?</b></p> <ul style="list-style-type: none"> <li>The site has outline planning permission. An application for reserved matters has not been made.</li> </ul> <p><b>Firm progress being made towards the submission of an application?</b></p> <ul style="list-style-type: none"> <li>There is no evidence that firm progress is being made towards the submission of an application for reserved matters.</li> </ul> <p><b>Written agreement between the LPA and the developer confirming their anticipated start and build-out rates?</b></p> <ul style="list-style-type: none"> <li>A written agreement between the LPA and a developer has not been provided,</li> </ul> <p><b>Firm progress with site assessment work?</b></p> <ul style="list-style-type: none"> <li>The outline planning permission was granted subject to conditions, including pre-commencement conditions. No evidence of firm progress with any of the site assessment work required to discharge the conditions has been provided</li> </ul> <p><b>Clear relevant information about viability, ownership constraints or infrastructure provision?</b></p> <ul style="list-style-type: none"> <li>The Council has not provided any details in terms of viability, ownership constraints or infrastructure provision. Given the recent Covid-19 pandemic, the Council would need to demonstrate that the site is viable.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>In summary, the Council has not provided any "clear evidence" of the type referred to in paragraph 68-007 of the PPG that housing completions will begin on this site within the next five years. The evidence that it has provided is not "clear evidence that housing completions will begin on site within five years. The site fails to meet the definition of "deliverable" as set out on page 66 of the Framework. It should be removed. This results in a deduction of <b>95 dwellings</b> from the Council's supply.</li> </ul>		
B12	Land at West Winds, Cholstrey Road, Leominster	23	<ul style="list-style-type: none"> <li>This site has outline planning permission for 23 dwellings (LPA ref: 160812). Whilst a reserved matters application has been made, it is pending determination. The site is located within the catchment area of the River Lugg and therefore there are issues in relation to phosphates.</li> <li>The Council has not provided clear evidence that housing completions will begin on this site within five years. No details of how the phosphate issue for this specific site have been provided by the Council and therefore it is unclear as to whether it can progress. The site should be removed. This results in a deduction of 10 dwellings.</li> </ul>	0	23
B14	Land adjacent to New House Farm, Marden	45	<ul style="list-style-type: none"> <li>As set out on page 66 of the 2019 Framework, the onus is on the Council to provide "clear evidence" that housing completions will begin on this site in the next five years.</li> <li>The comments in the AMR are not clear evidence that housing completions will begin on this site within five years.</li> <li>Paragraph 68-007 of the PPG provides some examples of the types of evidence that could be provided as I discuss below.</li> </ul>	0	45

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<p><b>Current planning status?</b></p> <ul style="list-style-type: none"> <li>The site has outline planning permission for up to 90 dwellings. An application for reserved matters was submitted 20 months ago and is pending determination.</li> </ul> <p><b>Firm progress being made towards the submission of an application?</b></p> <ul style="list-style-type: none"> <li>A reserved matters application has been made. However, the site falls within the River Lugg catchment area and therefore it is not known whether the application can be determined at the present time without an appropriate assessment.</li> </ul> <p><b>Written agreement between the LPA and the developer confirming their anticipated start and build-out rates?</b></p> <ul style="list-style-type: none"> <li>A written agreement between the LPA and a developer has not been provided.</li> </ul> <p><b>Firm progress with site assessment work?</b></p> <ul style="list-style-type: none"> <li>The site is located within the River Lugg catchment area, but firm progress with site assessment work to address this issue has not been provided.</li> </ul> <p><b>Clear relevant information about viability, ownership constraints or infrastructure provision?</b></p> <ul style="list-style-type: none"> <li>The Council has not provided any details in terms of viability, ownership constraints or infrastructure provision. Given the recent Covid-19 pandemic, the Council would need to demonstrate that the site is viable.</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>In summary, the Council has not provided the "clear evidence" of the type referred to in paragraph 68-007 of the PPG that housing completions will begin on this site within the next five years. The evidence that it has provided is not "clear evidence that housing completions will begin on site within five years. The site fails to meet the definition of "deliverable" as set out on page 66 of the Framework. It should be removed. This results in a deduction of <b>45 dwellings</b> from the Council's supply.</li> </ul>		
B17	Land at Hildersley, Ross on Wye	112	<ul style="list-style-type: none"> <li>As set out on page 66 of the 2019 Framework, the onus is on the Council to provide "clear evidence" that housing completions will begin on this site in the next five years. The few comments in the position statement are not clear evidence that housing completions will begin on site within five years.</li> <li>Paragraph 68-007 of the PPG provides some examples of the types of evidence that could be provided as I discuss below.</li> </ul> <p><b>Current planning status?</b></p> <ul style="list-style-type: none"> <li>The site has outline planning permission for up to 212 dwellings. An application for reserved matters has not been made.</li> </ul> <p><b>Firm progress being made towards the submission of an application?</b></p> <ul style="list-style-type: none"> <li>There is no evidence that firm progress is being made towards the submission of a reserved matters application. Appendix 2 of the position statement refers to a land purchase and a reserved matters application but does not provide any details as to when this will be. Appendix 2 of the previous position statement stated that an application for reserved matters was "expected" in autumn 2019. This did not happen</li> </ul>	0	112

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<p><b>Written agreement between the LPA and the developer confirming their anticipated start and build-out rates?</b></p> <ul style="list-style-type: none"> <li>A written agreement between the LPA and a developer has not been provided. It is not known whether a developer is involved. The position statement states that the site is currently for sale.</li> </ul> <p><b>Firm progress with site assessment work?</b></p> <ul style="list-style-type: none"> <li>The outline planning permission was granted subject to 19 conditions, including pre-commencement conditions. No evidence of firm progress with any of the site assessment work required to discharge the conditions has been provided.</li> </ul> <p><b>Clear relevant information about viability, ownership constraints or infrastructure provision?</b></p> <ul style="list-style-type: none"> <li>13.69 The Council has not provided any details in terms of viability, ownership constraints or infrastructure provision. Given the recent Covid-19 pandemic, the Council would need to demonstrate that the site is viable</li> </ul> <p><b>Summary</b></p> <ul style="list-style-type: none"> <li>In summary, the Council has not provided any "clear evidence" of the type referred to in paragraph 68-007 of the PPG that housing completions will begin on this site within the next five years. The evidence that it has provided is not "clear evidence that housing completions will begin on site within five years. The site fails to meet the definition of "deliverable" as set out on page 66 of the Framework. It should be removed. This results in a deduction of <b>112 dwellings</b> from the Council's supply.</li> </ul>		
B18	Land adjacent to Stoke Lacy Village Hall, Stoke Lacy	10	<ul style="list-style-type: none"> <li>This site has outline planning permission for 10 dwellings (LPA ref: 1172292). Whilst a reserved matters application has been made, it is pending determination. The site is located within the catchment area of the River Lugg and therefore there are issues in relation to phosphates.</li> <li>The Council has not provided clear evidence that housing completions will begin on this site within five years. No details of how the phosphate issue for this specific site have been provided by the Council and therefore it is unclear as to whether it can progress. The site should be removed. This results in a deduction of <b>10 dwellings</b>.</li> </ul>	0	10
B19	Land at the Lakes, Swainshill, Hereford	10	<ul style="list-style-type: none"> <li>This site has hybrid planning permission; full planning permission for 1 dwelling and outline planning permission for 9 dwellings. The position statement provides no evidence that the outline planning permission will be implemented. Therefore, 1 dwelling should be included and <b>9 dwellings</b> should be removed.</li> </ul>	1	9
C01	Docklow Ponds, Docklow	1	<ul style="list-style-type: none"> <li>The site has a resolution to grant planning permission for a dwelling to be occupied by the site manager subject to a S106 agreement being signed (LPA ref: 192317). However, due to the phosphate issue, the S106 has not been signed. As it is unknown if this issue will be overcome then there is not "clear evidence" for the inclusion of this site. It should be removed. This results in a deduction of <b>1 dwelling</b>.</li> </ul>	0	1
C02	Field adjoining A4112 and Chestnut Avenue, Kimbolton	25	<ul style="list-style-type: none"> <li>This site has detailed consent for 21 dwellings and is already included in the supply (LPA ref: 180323)<sup>1</sup>.</li> <li>A revised planning application (ref: 181384) for the development of 25 dwellings instead of the 21 approved was submitted on 12<sup>th</sup> April 2018. The application was recommended for approval subject to the signing of a Section 106 agreement on 22<sup>nd</sup> August 2018.</li> <li>Appendix 2 of the housing land supply position explains that the phosphate issue is preventing the sign off of the S106.</li> </ul>	0	25

<sup>1</sup> Please see Core Document **CD1.15**, page 17

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<ul style="list-style-type: none"> <li>The site had planning permission at the base date for 21 dwellings and those units are included in the supply (on page 19 of appendix 1 of the position statement). To then include 25 dwellings would be double counting. There is no clear evidence that the 25 dwelling scheme will be implemented, given the delays to the S106 agreement and the fact the phosphate issue needs to be resolved. This results in a deduction of <b>25 dwellings</b>.</li> </ul>		
C03	Land adjacent to Spring Cottage, Headbrook	33	<ul style="list-style-type: none"> <li>An outline planning application (ref: 181494) was submitted for 33 dwellings on 23<sup>rd</sup> April 2018. The application was recommended for refusal at planning committee on 18<sup>th</sup> December 2018, however members resolved to approve it subject to a S106 agreement no decision has been issued to date.</li> <li>Appendix 2 of the housing land supply position statement explains that the phosphate issue is preventing the sign off of the S106. There is no clear evidence for the inclusion of this site. This results in a deduction of 35 dwellings.</li> </ul>	0	35
D01	Three Elms, Hereford	110	<ul style="list-style-type: none"> <li>As set out on page 66 of the 2019 Framework, the onus is on the Council to provide "clear evidence" that housing completions will begin on this site in the next five years.</li> <li>The comments in the AMR are not clear evidence that housing completions will begin on site within five years.</li> <li>Paragraph 68-007 of the PPG provides some examples of the types of evidence that could be provided as I discuss below.</li> </ul> <p><b>Current planning status?</b></p> <ul style="list-style-type: none"> <li>The site does not have planning permission. Whilst an outline planning application was made 4 years ago, it is still pending determination and there is uncertainty about whether it will be determined of if it is to be determined, when that will be.</li> </ul> <p><b>Firm progress being made towards the submission of an application?</b></p> <ul style="list-style-type: none"> <li>Due to the uncertainty with the outline planning application, there is no evidence that firm progress is being made towards the submission of an application for reserved matters.</li> </ul> <p><b>Written agreement between the LPA and the developer confirming their anticipated start and build-out rates?</b></p> <ul style="list-style-type: none"> <li>A written agreement between the LPA and a developer has not been provided. The Council's housing land position statement states that Taylor Wimpey have development option on some of the smaller parcels of land to the south of the expansion area, but no evidence has been provided from Taylor Wimpey in terms of their programme.</li> </ul> <p><b>Firm progress with site assessment work?</b></p> <ul style="list-style-type: none"> <li>There is uncertainty as to whether the bypass will go ahead and how the site will be developed if it does not. No evidence has been provided about this or any of the other site assessment work.</li> </ul> <p><b>Clear relevant information about viability, ownership constraints or infrastructure provision?</b></p> <ul style="list-style-type: none"> <li>The Council has not provided any details in terms of viability, ownership constraints or infrastructure provision.</li> </ul>	0	110

EP ref:	Site Address	Council's 5YHLS	Summary Comment	Appellant's 5YHLS	Difference
			<p><b>Summary</b></p> <ul style="list-style-type: none"> <li>In summary, the Council has not provided any "clear evidence" of the type referred to in paragraph 68-007 of the PPG that housing completions will begin on this site within the next five years. The evidence that it has provided is not "clear evidence that housing completions will begin on site within five years. The site fails to meet the definition of "deliverable" as set out on page 66 of the Framework. It should be removed. This results in a deduction of <b>110 dwellings</b> from the Council's supply.</li> </ul>		
D03	Hereford City Centre Urban Village	80	<ul style="list-style-type: none"> <li>Hereford City Centre is expected to deliver around 800 new homes in the plan period as set out in policy HD2. The Council includes 80 dwellings from the City Centre in the five year supply.</li> <li>The Council's position statement states:                             <p style="text-align: center;"><i>""Based on recent year's performance, the build out has been revised down as it is more reflective of delivery rates in the area over the past nine years. Therefore a rate 40 dwellings per annum for years 4 and 5 is forecast to avoid double counting with current permissions""</i></p> </li> <li>The current AMR explains that by 31<sup>st</sup> March 2019, 372 dwellings had been completed. Therefore, the average number of completions in the City Centre over the first 9 years has been 41.3 dwellings. Based on this rate of delivery, over the next five years, 207 dwellings could be expected to be delivered (i.e. 41.3 X 5 years).</li> <li>15.23 The housing land position statement explains that at 1st April 2020 there were commitments for 188 dwellings in Hereford. These are listed in the table on page 8 of Appendix 1 of the housing land position statement (86 dwellings have not been started, 106 are under construction and 4 dwellings are expected to be lost through conversion = 188 dwellings in total). These dwellings are not contested. Therefore, based on past build rates, the additional contribution which could be expected in the city centre is 19 dwellings (i.e. 188 + 19 = 207). This means that <b>61 dwellings</b> should be removed from the supply.</li> </ul>	19	61
	Neighbourhood Plan Allocations	337	<ul style="list-style-type: none"> <li>The Council includes 337 dwellings on sites allocated in "made" Neighbourhood Plans without planning permission at the base date. These are listed in appendix 3 of the Council's five year position statement.</li> <li>The onus is on the Council to provide the clear evidence that housing completions will begin on these sites in the five year period. However, the position statement provides no evidence for their inclusion or how applications made in those neighbourhood areas in the north of the borough within the River Lugg catchment could be approved. On this basis, I include the one site that has planning permission but conclude that the Council has failed to provide clear evidence that housing completions will begin on the remaining sites. This means <b>329 dwellings</b> should be removed</li> </ul>	8	329
	Small Sites Windfall Allowance	200	<ul style="list-style-type: none"> <li>Based on past trends, over a five year period, 855 dwellings could be expected to be delivered on small windfall sites (i.e. sites of 4 or fewer dwellings).</li> <li>However, the Council's supply already includes 995 dwellings on sites of less than 4 dwellings. If all these dwellings were delivered, then this would be in excess of past trends. On this basis, there is no compelling evidence that an additional 200 dwellings will be delivered in the five year period.</li> <li>Further, the Council has not provided compelling evidence to demonstrate that the past completion rate on small sites will continue. Applications within the River Lugg catchment area are currently not being determined and this will therefore have an impact on windfall development within this area.</li> </ul>	0	200
				<b>Total</b>	<b>1,312</b>