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**Sent:** 03 August 2021 11:00  
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**Subject:** RE: 3253901, site at : Land off Lugg Green Road, Kingsland, Leominster, Council ref: 200367

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Dear Mike

I am in receipt of the email of 29<sup>th</sup> July from Herefordshire Planning Department enclosing new information regarding their 5 year housing land supply and seeking to have the appeal withdrawn.

The email makes a series of assertions that the Authority believes they now have a 5 year supply but no evidence is enclosed. Until such evidence has been put before the Secretary of State and properly tested I believe that paragraph 11 continues to apply.

Herefordshire Council has been overly optimistic in the past concerning claims of a 5 year supply. At the Core Strategy adoption stage in 2015 they claimed a 5 year land supply. This was accepted because the Core Strategy as amended by the Inspector was judged to be far superior to the outdated Unitary Plan. The claim of a 5 year supply was overturned within months and the Authority has not had a 5 year supply since. Indeed it has progressively deteriorated.

In February 2020 it was said to be 3.67 years and this was raised to 4.22 years in February 2021 (this year) and we are now supposed to believe by some miracle that by July 2021 it has jumped to 6.9 years. Inspectors at appeal have consistently not accepted figures put forward by Herefordshire Council.

The Minister of Housing even, on 15<sup>th</sup> March 2021 in his Decision on the appeal APP/W1850/W/20/3244410 **Town and Country Planning Act 1990 – Section 78 Appeal made by Bloor Homes Western. Land North of Viaduct, adjacent to Orchard Business Park, Ledbury, reference 171532** at para 25 says “**The Secretary of State has noted the Inspector’s consideration at IR16.116-16.118. The Secretary of State has explained in paragraph 9 of this letter that, following the publication of the Housing Delivery Test: 2020 results, the Council now considers it can demonstrate 4.22 year of housing land supply. The Secretary of State also notes that, following the results, the requirement for the Council to apply a 20% buffer, which was the position at the time of the Inquiry, has changed. Nevertheless, even taking the new housing figures into account, he agrees with the Inspector that there is still a substantial shortfall in the 5 year housing land supply (IR16.18).**” Until such time as the figure of 6.9 years has therefore been agreed by an Inspector at appeal I believe it should be treated with considerable caution.

The NPPF has to be read as a whole and there are no identified adverse impacts arising from the proposal which is in scale with this settlement and is sustainable development for all the reasons set out in the appellant’s case.

The site is considered to be in an ideal location for development and in a sustainable part of Kingsland which affords no harm to the Conservation Area or any Listed Buildings. I have no hesitation, therefore, in view of the above, in not accepting the LPA's suggestion to withdraw the appeal.

I hope this clarifies the situation and look forward to receiving the Council's Response to the Statement of Common Ground and a date for the Hearing.

Regards  
John

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