

**Walford Neighbourhood Development Plan
2011-2031**



**Addendum No 1 Report
Meeting Housing Need and Site
Assessment Report**

December 2020

Prepared by Walford Parish Council NDP Committee

Version Control

Date	Version	Tasks	Author
25/11/2020	V.1	Produce draft Addendum for consideration by Walford Parish Council NDP Committee	WB
9/12/2020	Final	Walford Parish Council NDP Committee approved the report, noting changes to the housing commitments because of a recent planning permission and Herefordshire Council updated figures.	WB

Walford Neighbourhood Development Plan - Housing Land Assessment 2011-2031 – Addendum Report 1

Purpose of this Report –

To update the previous report following further site submissions.

1. Introduction

- 1.1 Walford Neighbourhood Development Plan Housing Land Assessment Report (August 2020 assessment) was published upon Walford NDP Website on 19th October 2020¹. This afforded an opportunity for informal comment in advance of preparing the draft Neighbourhood Development Plan (NDP). A number of additional submissions were received following publication, including clarification from a number of landowner's/developers who had submitted sites considered in that report. With the draft NDP not having reached the stage where it had been approved for formal consultation, it was agreed that these submissions should be assessed and presented in an Addendum report. A map showing the sites submitted for consideration since the decision to prepare the NDP is shown at Appendix 1
- 1.2 Two submissions related to sites considered in the first report:
- Land to the rear of Cedar Grove and Coughton Place, Coughton (Site reference 21).
 - Land off Watling Street, Ross-on-Wye (Site reference 24).
- 1.3 Two submissions involved new sites:
- Land adjacent to Bishopswood House (Site reference 35)
 - Land at Waters Edge, Howle Hill (Site reference 36)

2. Additional Site Assessments and Reviews

- 2.1 The review of the two sites included in the August 2020 report involved clarification of matters upon which additional information had previously been sought. The new sites were assessed in accordance with the two-stage approach adopted in the earlier assessment.

Land to the rear of Cedar Grove and Coughton Place, Coughton (Site reference 21).

- 2.2 This site proceeded to the assessment at Stage 2 although at that stage it was not considered deliverable because the access to the site was substandard in terms of width and visibility onto the B4234. Clarification was sought from the site owner about whether this could be addressed but no response was received prior to publishing the report.

¹ <https://walford-ndp.co.uk/major-report-published/>

- 2.3 The site owner has now advised that he has agreed with his neighbour to bring forward a wider access partly across their land and shown in a plan provided (see Appendix 2). Clarification was sought from both the site owner and neighbour upon a number of matters, especially whether this was the only access arrangement, because there remained concerns about substandard visibility to the north at the suggested exit point. In response, the site owner confirmed that an alternative access arrangement to enable appropriate visibility could be considered. It should be noted that the neighbouring land was also submitted and assessed as Site 11 and for which the variation Site 11(R) was considered a suitable site. The neighbouring landowner confirmed that although there is no agreement in place for any particular means of access via Site 11(R) to the B4234 because it is too early for a route to be defined at this stage. The proposal to widen the access track was simply to show there is a suitable means of access to Walford Road.
- 2.4 The site owner also confirmed that although the plan (Appendix 2) showed only part of the originally submitted site, the larger (full) site was suggested for discussion. In terms of whether a combined proposal is being advanced, the neighbouring landowner advised that he was conscious of the assessment within the August 2020 report and indicated that he sees no benefit in considering any combined proposals at this time. He wishes to see the two sites developed independently. He will, nevertheless, continue to be mindful of the need for access to Site 21 as part of any planning application as this will preserve the opportunity for further housing in the parish.
- 2.5 The August 2020 assessment for Site 21 concluded:
- "For the site to be considered, it would need to be developed in association with other land that could provide a suitable access. There is no indication that land to the north is available. Site 11 to the south would enable a connection to the B4234 and has been submitted for consideration. However, the reduced area for that site would need to be extended. In combination, the two sites would represent a significant extension to the settlement and may amount to 'major development' within the AONB. This may be an option should it not be possible to deliver the required level of proportional housing growth within the Parish in any other way and the effects on the Wye Valley AONB and Coughton Wood and Marsh SSSI can be mitigated to a satisfactory degree. The main effects arising from a combined development would be to increase the potential adverse effects on settlement character and landscape and upon nature conservation assets.*
- "For this site to be considered in association with site 11, the combined effects would need to be assessed. A smaller site (in terms of Site 21) may also be defined that would reduce the landscape effects to a limited extent should this be considered more acceptable. Alternatively, another suitable access would need to be indicated."*
- 2.6 It is estimated that the area for Site 21 is in the order of 2.9 Hectares, providing for around 60 dwellings. A smaller site may be considered utilising just under half of the site based on a former field boundary and this would amount to 1.2 hectares accommodating around 25 dwellings. Both are shown on the planning concept diagram at Appendix 3. The 40 dwellings provided upon Site 11(R) would be in addition to these figures and the effect of development for the combination of the two areas should inform the assessment.
- 2.7 The site has been reassessed on the basis of the above and the scale of the adverse effect upon the landscape criteria is considered to increase the scores for Site 11(R)/21

under 1.1, 1.2 and 1.3 to 5. This reflects National Planning Policy Framework (NPPF) that indicates the scale and extent of development within AONBs should be limited².

- 2.8 In terms of scale in relation to the setting of the settlement it is estimated that the combination of the two sites would add between 65 and 100 further dwellings. The estimated number of dwellings within the three clusters forming Walford and Coughton is around 200 dwellings although that within the northern cluster to which this site would be added is around 130 dwellings. The northern and central clusters, between which Site 11(R) sits, together amount to around 160 dwellings. In relation to the latter figure, the scale of development would reflect a growth of between 40% and 60% depending upon which site option was utilised for Site 21. The NPPF indicates that planning permission should be refused for major development³ other than in exceptional circumstances. In the light of this assessment and the likely effect on the landscape of the AONB, professional opinion is that the scale of the combined site is likely to amount to major development although such a decision, so far as it relates to the allocation of sites within the NDP, is one that the Parish Council should determine. Should it be considered major development, matters considered to be of public interest may then be considered.
- 2.9 The sites could be developed in combination or separately with Site 21 following on from Site 11(R) either within the plan period or at a later date.
- 2.10 The combination of Sites 11(R) and 21 does provide a further development option to meet the required level of proportional housing growth.

Land off Watling Street, Ross-on-Wye (Site reference 24).

- 2.11 This site was considered at Stage 2 of the assessment but removed as a site option because the landowner advised it was intended for a care home. The landowner has now indicated that he is open to residential use for the Watling Street site. There was concern about the ability to provide an access of sufficient width to the site, but the landowner has provided information to suggest that land is within the ownership that would enable this. The August 2020 assessment concluded that a reduced site area would reduce the potential adverse effects on the landscape to an acceptable level.
- 2.12 Scoring based upon a reduced site is indicated in the August 2020 assessment and this should be used in ranking the site's relative suitability.

Land adjacent to Bishopswood House (Site reference 35)

- 2.13 This is a new site submitted after the August 2020 assessment report was published. Its area is quoted as 0.5 ha with a previous use indicated as caravan storage and workshops. Its location is off an unnamed track leading from the B4234 opposite Wyeside Caravan Park. A plan indicating its extent and location in relation to

² See paragraph 172 in the National Planning Policy Framework

³ See paragraph 172 and footnote 55 in the National Planning Policy Framework -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Bishopswood House was provided (Appendix 4). Appendix 5 shows the site's location in relation to Bishopswood, the nearest settlement.

- 2.14 As a new site, a Stage 1 assessment has been undertaken. This considers the site against a limited number of major criteria which may rule a site out. These are explained in section 2 of the August 2020⁴ report.
- 2.15 The table below sets out the Stage 1 assessment.

Criterion	Assessment
Within or Adjacent to settlement	The site is not within or adjacent to any named settlement.
Within Flood Risk Zones 2 or 3	Not within FRZ 2 or 3.
Direct effect on a Nat/Int Designated Site	None present.
Deliverability	Has access onto a road frontage. Submitted by landowner.
Potential Major Development	Within AONB – medium sized site.
SHLAA Conclusion	Not considered through the SHLAA.
Conclusion	This site would not comply with CS Policy RA2 but would have to be considered under CS Policy RA3. Site should NOT be assessed in greater detail within stage 2.

- 2.16 The conclusion is that the site would not comply with Core Strategy policy RA2 in that it is not within or adjacent to the built-up area of any settlement, the closest being Bishopswood. The site does fall within the definition of a brownfield site (previously developed land) included in the NPPF⁵. However, both the NPPF⁶ and Core Strategy policy RA2 indicate that weight should be given to such land within settlements. Notwithstanding this, similar cases have been made to Herefordshire Council for land in the countryside to be redeveloped⁷ where there are considered to be important benefits. However, this would need to be through the submission of a planning application rather than presented as an allocation a neighbourhood or local plan. Any such dwellings considered acceptable would contribute towards the windfall allowance.

⁴ <https://walford-ndp.co.uk/major-report-published/>

⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf - Appendix 2

⁶ Ibid – paragraph 118(c)

⁷ Examples in the vicinity of the Wye valley AONB can be found at:

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=143204&search-term=P143204/F

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=163303&search-term=The%20Old%20Nurseries

Land at Waters Edge, Howle Hill (Site reference 36)

- 2.17 This is another new site submitted since the August 2020 report was produced. It comprises a site of just under 0.7 hectares and the submission indicates its previous use was landscape design, retail and plant nursery. It is located on the cross-roads of Sharman's Pitch, Star Beech Hill and Church Road. The site's location and relationship to the built-up area defined for Howle Hill is shown at Appendix 6.
- 2.18 A Stage 1 assessment has been undertaken. This has been informed by Herefordshire Council's decision on planning application P190316/F⁸ which was refused on 6th November 2020. The reasons for refusal were:

1. The site lies in open countryside and is not well related to the main built-up part of Howle Hill and as such the proposal represents an unjustified and unsustainable form of development contrary to Policies SS1 and RA3 of the Herefordshire Local Plan - Core Strategy and the guidance provided by the National Planning Policy Framework. In view of the sites rural location, a lack of local services and poor transport connectivity future residents would be entirely reliant upon the use of private motor vehicles in a location where new residential development of this type is not supported unless it meets exceptional criteria.

2. The proposed development by reason of its scale and suburban form would have an unacceptable and harmful impact upon the character, amenity and appearance of Howle Hill and of the Wye Valley Area of Outstanding Natural Beauty contrary to Herefordshire Core Strategy policies SS6, RA2 and LD1, the Wye Valley AONB Management Plan WVD2 and WVD3 and paragraph 172 the National Planning Policy Framework.

The planning application suggested that it was a brownfield site (previously developed land included in the NPPF⁹). Should it be relevant, some clarification would be required in terms of whether it is a nursery or equivalent to a garden centre. The former would be a horticultural use which falls outside of the definition for brownfield land. In any event, both the NPPF¹⁰ and Core Strategy policy RA2 indicate that weight should be given to brownfield sites within settlements rather than in the countryside.

- 2.19 The refusal of planning permission is consistent with the refusal of planning permission and dismissal at appeal of housing development at Site 18 (Planning applications P161964/F; P171105/F; Appeal APP/W1850/W/17/3179) – see August 2020 assessment paragraphs A.37 to A.39. The area surrounding the crossroads is defined as a group of buildings related to each other and to their previous use as

8

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=190316&search-term=P190316/F

9

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf - Appendix 2

¹⁰ Ibid – paragraph 118(c)

part of a farm with Little Howle Farm recorded as a Historic Farmstead. As such it is considered a distinct and separate area from the built-up areas defined for the settlement of Howle Hill. The submitted site is separated from the built-up area defined for Howle Hill in the August 2020 assessment by some 70m of undeveloped frontage. To incorporate this site into an extended boundary would include the intervening land and result in a settlement area of such a scale to fundamentally change the character and scenic beauty of the AONB and the settlement pattern of Howle Hill. This would similarly be the case should a further cluster be defined around the crossroads, with the added adverse effect on the character of the historic farmstead, an important heritage asset within the AONB.

2.20 The table below sets out the Stage 1 assessment for site 36.

Criterion	Assessment
Within or Adjacent to settlement	The site is not within or adjacent to any named settlement for the reason set out above.
Within Flood Risk Zones 2 or 3	Not within FRZ 2 or 3.
Direct effect on a Nat/Int Designated Site	None present.
Deliverability	Has access onto a road frontage. Submitted by agent for the landowner.
Potential Major Development	Within AONB – medium sized site.
SHLAA Conclusion	Not considered through the SHLAA.
Conclusion	This site would not comply with CS Policy RA2 but would have to be considered under CS Policy RA3. Site should NOT be assessed in greater detail within stage 2.

2.21 The conclusion, supported by decisions on a planning application for the site and an appeal for a nearby site, is that the site would not comply with Core Strategy policy RA2 in that it is not within or adjacent to the built-up area of any settlement, the closest being Howle Hill.

3. Developing Options

3.1 The above review of the additional submissions has identified that two additional sites might be considered as potentially suitable sites (Sites 21 and 24). Appendix 8 to the August 2020 assessment report shows the previous scoring for these two sites. In both instances, however, it was considered that the proposals included in the original submissions did not represent deliverable housing sites.

3.2 For reasons set out in the August Site 2020 assessment and highlighted above, Site 21 can only be delivered in association with Site 11(R) and consequently the scores shown in parenthesis in the Applications of Weighting matrices at Appendix 8 are considered appropriate.

3.3 In relation to Site 24, the revised site area presented as Site 24(R) is considered suitable on the basis that it should be capable of reducing the effect on the

landscape to a satisfactory level and there is sufficient width for an access to the site from Watling Street in accordance with the advice received from the landowner.

- 3.4 Table 1(A) below, which includes the two additional sites, shows the revised ranking of sites according to how well they meet the weighted criteria.

**Table 1(A): Ranking of Sites Considered Suitable for Housing
(Outstanding Minimum Target 51 dwellings)**

Rank Order	Site Reference	Number of dwellings
1	Site 11(R)	40
2	Site 24(R)	5
3	Site 6(R1)	16
4	Site 7(R)	10
5	Site 32	5
6	Site 34	3
7	Site 26	3
8*	Sites 11(R) and 21 combined	65 to 100

*Subject to decision under NPPF paragraph 172¹¹

- 3.5 Four options to provide for housing development are presented in the August 2020 assessment. The addition of Site 24 does not alter the basis for the options previously presented to any significant extent. The inclusion of the combined Site 11(R) and 21 would introduce a new category of 'very-large site' into categories described in paragraph 4.2 of the August 2020 assessment. Should the combination of Sites 11(R) and 21 be considered suitable, not amount to 'major development' or, if it does, there are exceptional circumstances in its favour, it presents a further option. The options would then comprise:

Option 1 - To meet the required housing needs through the allocation of one large site with any shortfall being made up through one or more medium or small sites and taking into account a realistic allowance for windfall development. One 'reasonable alternative' large site is considered available - Site 11(R). There would be a shortfall of some 14 dwellings that would need to be found from the various combinations available from medium and small sites and a realistic windfall allowance.

Option 2 – To meet the required housing need through the allocation of medium and small sites together with a realistic windfall allowance. The estimated total number of dwellings that might be expected to result from the medium and small sites is 42 dwellings. This would leave a shortfall of 12 dwellings and there would need to be a high degree of certainty that this could be provided through the windfall allowances.

¹¹ See paragraph 172 in the National Planning Policy Framework - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

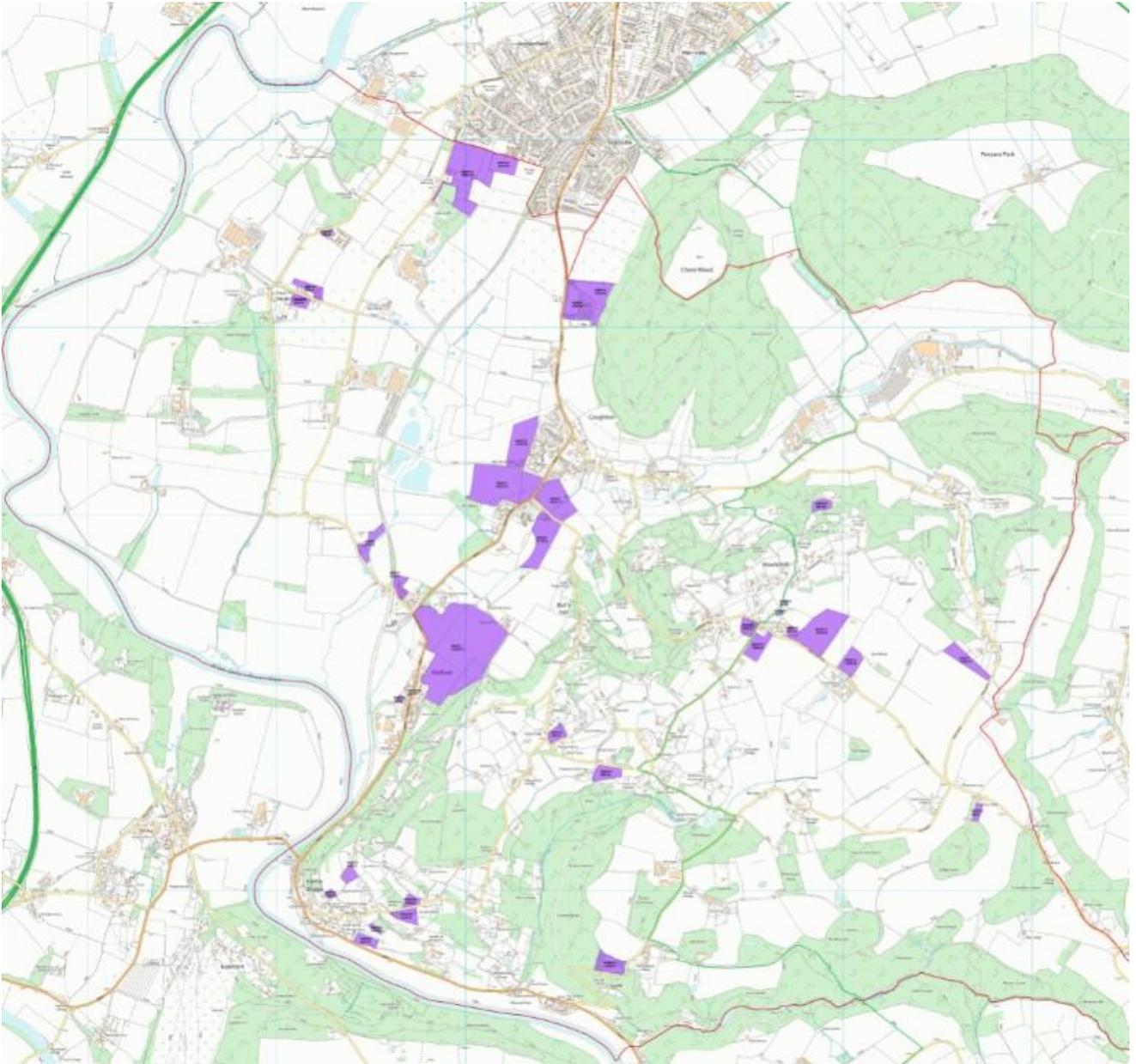
Option 3 – To utilise sites in order of ranking in order to meet and exceed the required level of housing growth which could be up to 107/142 dwellings depending upon the cut-off point chosen and the extent of area agreed for Site 21. All would be in addition to any windfall allowance.

Option 4 – Not to include any housing land allocations but rely upon a policy to define how new dwellings will be accommodated. This might utilise specifically related policies for settlements in Walford Parish or, if not possible, Core Strategy policy RA2.

Option 5 (NEW) - Allocate one very large site which would comprise the combination of Sites 11(R) and 21. This would provide between an estimated 65 and 100 dwellings in addition to any windfall allowance.

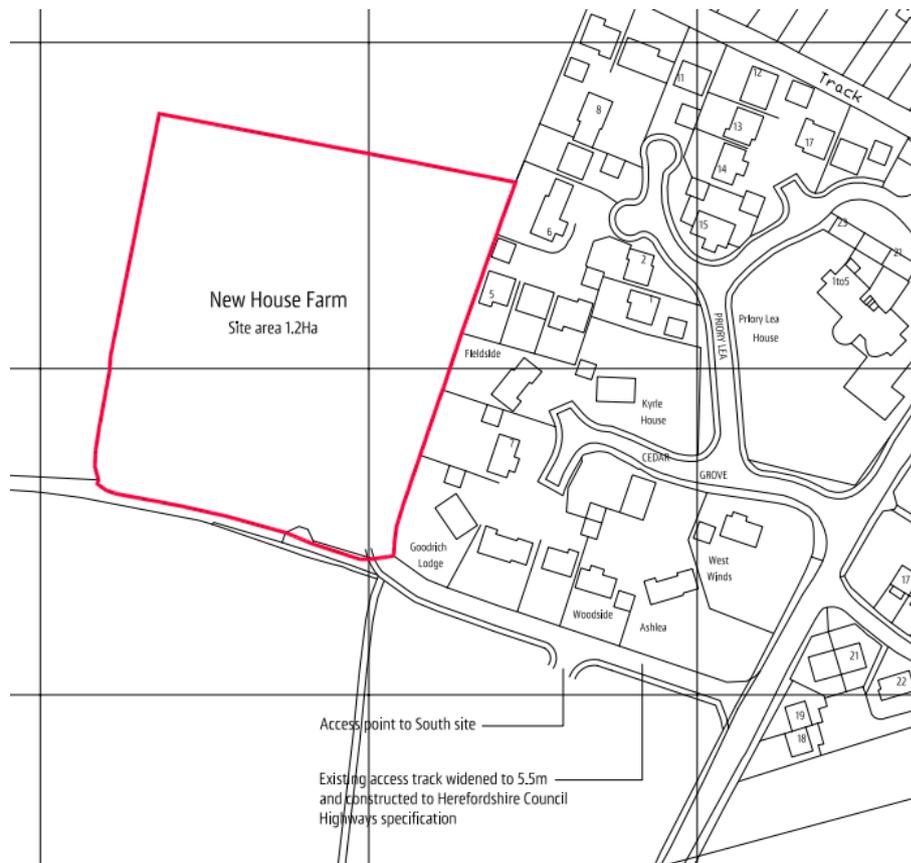
- 3.6 The estimated allowance for windfall dwellings set out in Section 5 of the August 2020 assessment was 17 dwellings. This included a potential site at Warryfield Farm (P194183F) which received planning permission for the conversion of rural buildings to 4 dwellings on 28th August 2020. The effect of this is to reduce the potential windfall allowance figure and also the outstanding housing requirement. The former is now 13. In addition, Herefordshire Council has now published its housing commitment figures for April 2020 which for Walford Parish amounts to 36. In combination the commitments at September 2020 amounts to 40 dwellings leaving a residual minimum housing requirement of 51 to be provided for within the NDP.

Appendix 1: Submitted Sites



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Appendix 2: Landowner's Map indicating Access Arrangements to Land to the rear of Cedar Grove and Coughton Place, Coughton (Site 21)



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Appendix 3: Site 21 Planning Concept Statement

Should the site be required as a housing allocation in order to contribute towards the required level of proportional housing growth or the chosen housing option advanced in the NDP the following development principles should be adopted:

1. The land would be developed in association with site 11 either in combination or through that site affording access.
2. Measures related to the protection and enhancement of the condition of Coughton Wood and Marsh SSSI should be undertaken as described for site 11. In addition, further measures should add to the ecological network through providing a steppingstone between the SSSI and Chase Wood.
3. A landscape and visual sensitivity assessment should be undertaken to inform design.
4. Structural landscaping buffers may be required, especially along the western edge and also to break up the form of development within the site.
5. Any hedgerows lost to create access to the site should be replaced.
6. The landscape scheme should provide biodiversity value adding to the ecological network.
7. Storm water drainage measures should be undertaken as described for site 11.
8. Footpath and Public Right of Way measures should be undertaken as described for site 11 including providing a footpath of sufficient width to provide a cycle route at a

future date to link the northern and southern ends of the site so that this may contribute towards an extended link at some time in the future to Ross-on-Wye.

9. Design should make provision for the protection of residential amenity of dwellings along the east side of the site.

10. Development should connect to the public sewer.



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Appendix 4: Agents Site Plan for Land adjacent to Bishopwood House (Site reference 35)

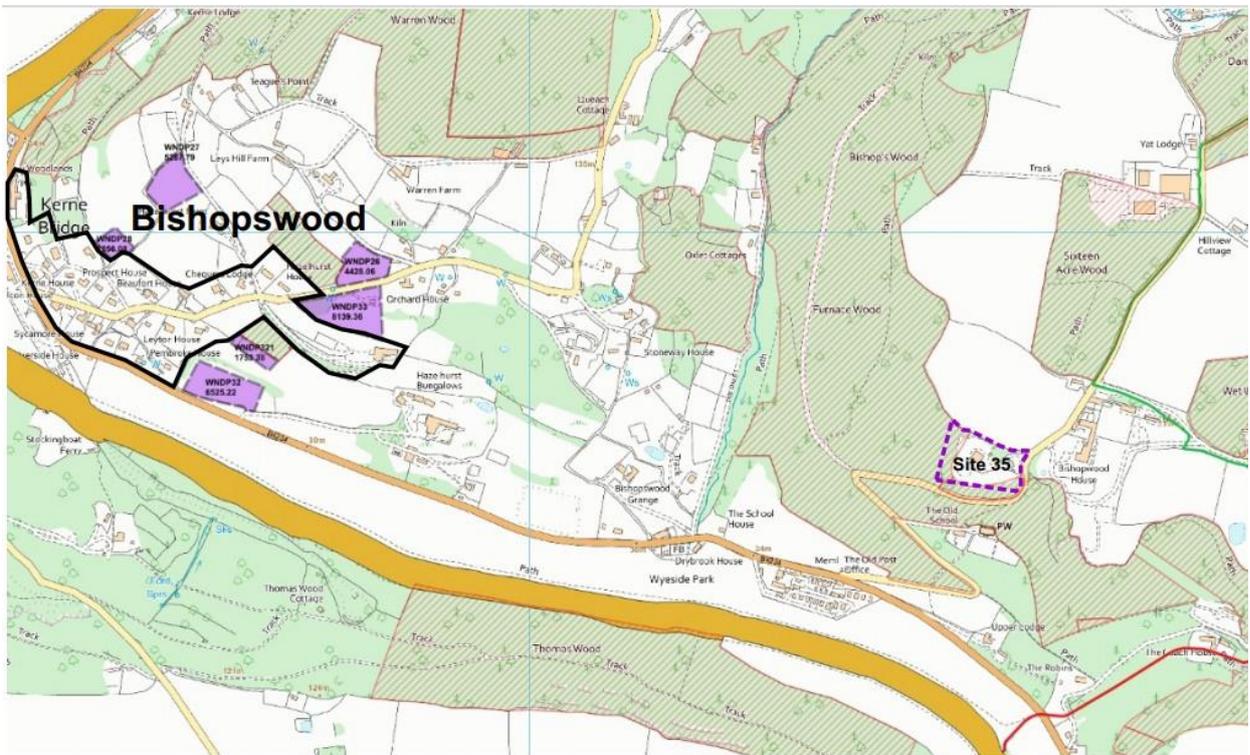


Plan Produced for: Woodfield Developments
Date Produced: 14 Sep 2020
Plan Reference Number: TORQM20258123216052
Scale: 1:1250 @ A4



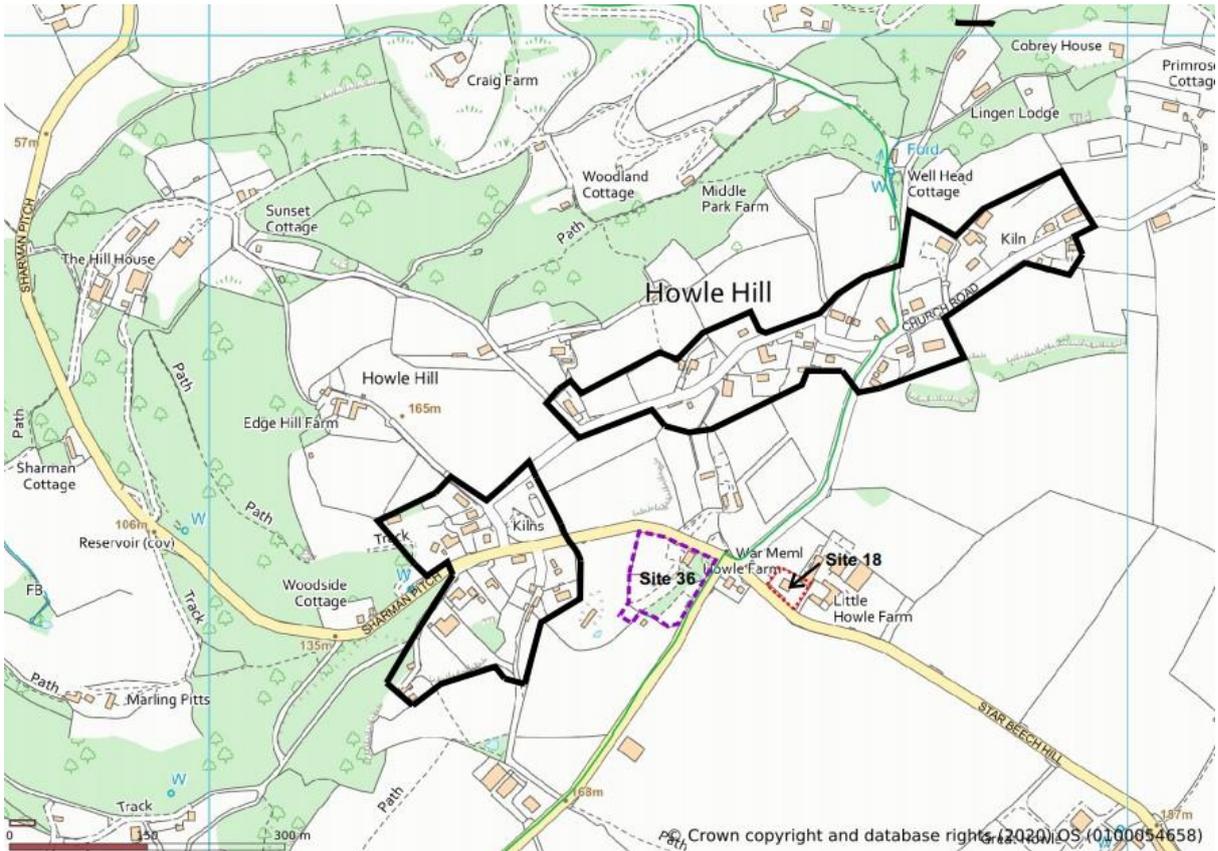
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Appendix 5: Location of Site 35 in location to Bishopwood



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Appendix 6: Location of Site 36, Howle Hill



Appendix 7: Gap between edge of Howle Hill (Sharman's Pitch) Built Up Area and Water's Edge Nursery

