

**Walford Neighbourhood Development Plan  
2011-2031**



**Addendum No 3 Report  
Meeting Housing Need and Site  
Assessment Report**

**June 2021**

**Prepared by Walford Parish Council NDP Committee**



### Version Control

<b>Date</b>	<b>Version</b>	<b>Tasks</b>	<b>Author</b>
16.6.2020	V.1	Produced draft Addendum 3 for consideration by Walford Parish Council NDP Committee	WB



## **Walford Neighbourhood Development Plan - Housing Land Assessment 2011-2031 – Addendum Report 3**

### ***Purpose of this Report –***

*To update the main report and Addendums following a further site submission and relevant new evidence affecting sites.*

## **1. Introduction**

- 1.1 Walford Neighbourhood Development Plan Meeting Housing Needs and Site Assessment Report (August 2020 assessment) was published upon Walford NDP Website on 19<sup>th</sup> October 2020. This together with Addendum No 1 and 2<sup>1</sup>, which assessed sites submitted subsequently have already been considered by Walford Parish NDP Committee. A revision to one site submission together with new and relevant evidence affecting two other sites at the settlement of Coughton and Walford have been received and are the subject of this report.
- 1.2 The two matters are:
  - A proposed revised site area for land west of Walford Road, Coughton (Site reference 11).
  - Information relating to the recent surface water flooding at the bottom of Bull's Hill Lane that would affect sites 6 and 7.

## **2. Additional Site Assessment**

### **Land West of Walford Road, Coughton (Site reference 11)**

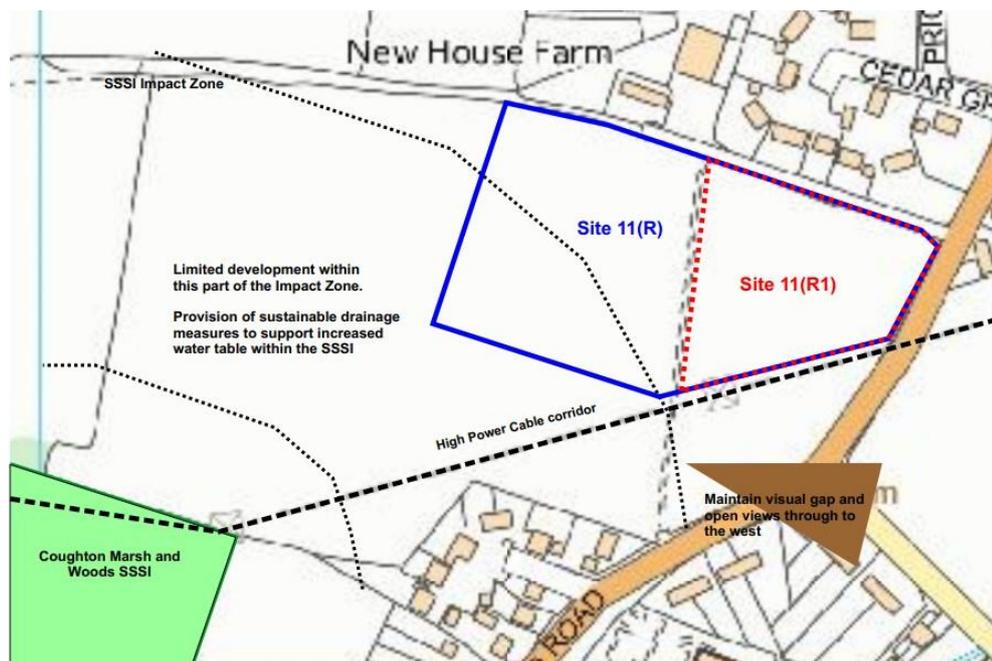
- 2.1 Site 11 progressed to a Stage 2 assessment and a reduced area [referred to as site 11(R)] was included in the ranking of sites that informed some options presented for the Parish Council's consideration.
- 2.2 The landowners of Site 11 have contacted the Parish Council to advise they would be happy to consider a smaller site to suit the preferred approach articulated by the respondents to the public consultations. They believe their suggestion will be better able to allow the desired number of affordable houses within walking distance of Walford Primary School.
- 2.3 Their proposal is to reduce the site to the area of Site 11R by restricting it to that on the eastern side of the footpath that crosses north-south through the field. This would be outside the 2<sup>nd</sup> level impact zone for Coughton Marsh SSSI upon which consultation with Natural England for 10 or more dwellings outside existing settlements (rural residential) would be required. They consider this would be more favourable in terms of biodiversity, ensure continued enjoyment and use of the public right of way, and retain the existing unhindered views to the west over agricultural land. Appendix 1 contains the submission received.
- 2.4 The landowner proposes the following within the submission for the further reduced site [referred to as 11(R1)]:

<sup>1</sup> For these reports see <https://walford-ndp.co.uk/project-documents/the-neighbourhood-plan/>

- *The NDP to allow limited development on the site to no more than 19 dwellings* - It should, however, be noted that a NDP examiner would probably modify a policy stipulating a maximum number of houses upon any site. A suggested number can be indicated. The intentions of the landowner would need to be relied upon to limit the number of dwellings to 19.
- *The area could be developed as two small groups of up to 10 dwellings* – This approach may be useful in design terms. It ought not to affect the requirement for affordable housing provided the site is shown as one housing allocation. However, if this is proposed as a phased approach, it might lengthen the period of any disruption caused by construction works, especially affecting those living in a first phase.
- *The opportunity is provided to reserve an extension to the site for future development should other sites not achieve the target number of homes.*

Other suggestions such as providing opportunities for self-build houses; allocation of allotments to the south; maintaining the visual gap between the two settlement clusters; encouraging sustainable development; and provision of structural landscaping are indicated although these would similarly apply to site 11(R). Map 1 defines the areas covered by the two alternatives - 11(R) and 11(R1).

**Map 1: Location of Site 11(R) and 11(R1)**



© Crown copyright and database rights (2020) Ordnance Survey (0100054658)

2.5 A review of Site 11(R1) against the housing site assessment criteria used in the main report and comparison with Site 11(R) has been undertaken with the conclusions set out in the following table:

Criterion	Site 11(R) Score	Site 11(R1) assessment	Site 11(R1) Score
1.1 Fits sensitively into the settlement	2 (Neutral)	Both options would reflect the form of housing estates within the settlement, especially those to its north. The new site option is not as	2 (Neutral)

		deep as site 11(R) but both would still reflect the modern housing estates to the north and south. The effect of any development on the new site option in terms of fitting into the settlement form is considered to remain neutral.	
1.2 Effect on setting of the settlement	3 (Minor adverse)	The principal issue identified under this criterion is the effect of development upon the gap between the central and northern clusters of the settlement, which should be avoided. Both site options would reduce the gap on the frontage to the same extent.	3 (Minor adverse)
1.3 Fits sensitively into landscape	4 (Adverse)	Although the new site option is smaller in scale, it still fronts onto the B4234 to the same extent. Both site options would combine the two clusters to the same extent along the B4234 frontage and be contrary to that characteristic of the Principal Settled Landscape type where you would normally see modest sized villages and hamlets reflecting its dispersed nature and scale. The current form already conflicts with this characteristic and hence the effect is judged not to be major adverse. It is considered that the difference in scale between the two options is not sufficient to reduce the effect from adverse to minor adverse.	4 (Adverse)
2.1 Effect on nature conservation sites and habitats	3 (Minor adverse)	The new site option excludes land within the SSSI 2 <sup>nd</sup> impact zone defined by Natural England where in rural locations it would be expected to be consulted upon development of 10 or more houses (rural residential). It does fall within the impact zone where the number of dwellings requiring consultation is higher, but the number of dwellings is not expected to meet this figure (50). The area incorporated within Site 11(R) was informed by the consultation requirement set out for the particular impact zone and hence it is considered that there is no notable difference between the two sites in this regard. Both site options would require the loss of hedgerow to gain access. Both site options might be explored to see whether benefits to the SSSI could	3 (Minor adverse)

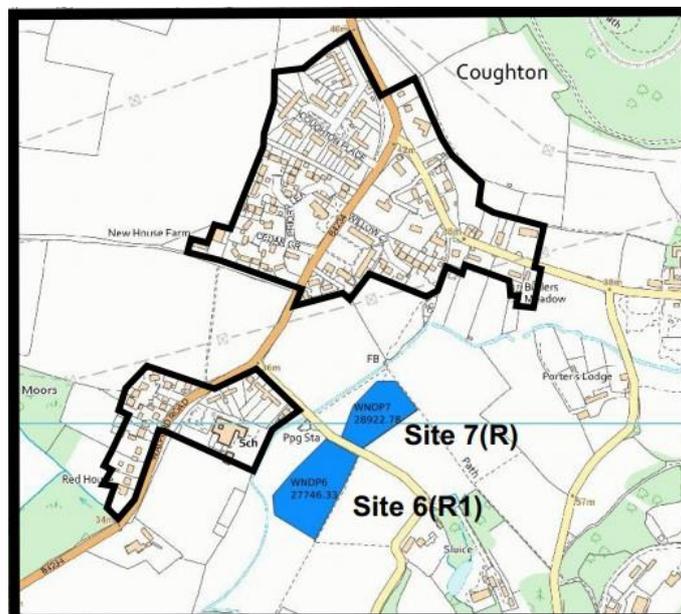
		be achieved in terms of strengthening its wetland characteristic. Any difference would appear to be marginal and is not sufficient to move the new site option to neutral (2).	
2.2 Effect on heritage assets	3 (Minor adverse)	Both would affect the identified heritage assets in the same way.	3 (Minor adverse)
3.1 Utilises greenfield or brownfield land	4 (Adverse)	Both are greenfield sites	4 (Adverse)
3.2 Protection of high-grade agricultural land and healthy soils.	4 (Adverse)	Both mostly Grade 2 agricultural land.	4 (Adverse)
4.1 Pollution	2 (Neutral)	Site option 11(R1) does not extend as close to the agricultural barn to the north-west but this is unlikely to be a bad neighbour use. There are already dwellings closer to the barn than either of the site options.	2 (Neutral)
4.2 Contaminated land	2 (Neutral)	There is no difference in the potential for contamination.	2 (Neutral)
5.1 Disposal of wastewater	1 (Positive)	Both site options are able to connect to the public sewer in the same way.	1 (Positive)
5.2 Other infrastructure problems	2 (Neutral)	Both options would require access for maintenance to and clearance for wire sag of the overhead cables which is provided for by the site configurations.	2 (Neutral)
5.3 Solar gain	1 (Positive)	Both site options are flat and would enable orientation of dwellings to maximise potential for solar gain.	1 (Positive)
6.1 Storm water drainage	3 (Minor adverse)	Both options omit the area of surface water flooding in the south-east corner of the land parcel. Both are affected by the surface water flooding along the middle of the B4234 along their road frontage. Both would have sufficient land available upon adjacent land in the ownership of the landowner to accommodate a soakaway.	3 (Minor adverse)
7.1 Safe vehicular access	2 (Neutral)	The ability to achieve the required site lines at an access point remains the same.	2 (Neutral)
7.2 Effect of vehicles on the highway network	2 (Neutral)	No change in terms of the capacity of the network in this location to accommodate development.	2 (Neutral)
7.3 Effect on pedestrian/cycle network and ease of access to public transport	2 (Neutral)	The same conditions apply to both site options in relation to the pavement along the B4234, public right of way No Walford 97, and maintaining its pleasurable use and views across to the west.	2 (Neutral)

- 2.6 The above assessment does not indicate any appreciable difference between the two site options to utilising the criteria set for the Stage 2 assessment. Site 11(R1), being smaller, does have a lesser adverse effect on a limited number of criteria, but it is considered this is not sufficient to move from one category to another within the assessment approach adopted. The issue of scale is one that the Parish Council might wish to consider when deciding upon its preferred development option to meet at least the minimum required level of proportional housing growth. The level of development suggested by the landowner for site 11(R1) would place it within the medium sized site category.

### 3. Surface Water Flooding at Bottom of Bull's Hill

- 3.1 An email dated 18<sup>th</sup> April 2021 was sent to the Parish Clerk containing videos of recent surface water flooding at the bottom of Bulls Hill. The information provided suggests that surface water flooding in this vicinity is greater than that shown on the Environment Agency's surface water flood map. It was reported to the NDP Committee on 28<sup>th</sup> May 2021 who agreed that it was relevant to the housing site assessment and asked that it be investigated further in advance of formal consultation with Herefordshire Council at the Regulation 14 stage.
- 3.2 Surface water flooding in locations such as this is a matter falling to be considered by the Lead Local Flood Authority (LLFAs) which is Herefordshire Council. Herefordshire Council uses its consultant Balfour Beatty Living Spaces (BBLs) for technical advice upon this matter. The information received was passed to that consultant for advice upon how it might affect sites 6(R1) and 7(R). The location of these two sites is shown on Map 2 below.

**Map 2: Location of Sites 6(R1) and 7(R)**



© Crown copyright and database rights (2020) Ordnance Survey ((0100054658))

- 3.3 It was already known that surface water flooding occurs on Bull's Hill Lane. Advice from BBLs about the possibility that this might be reduced through utilising a SUDs scheme in association with development of the sites on either side of the lane is that diverting any surface flood water from outside of sites 6(R1) [land south of Bull's Hill

Lane] and 7(R) [land north of Bull's Hill Lane] into any SUDs/soakaway schemes serving the respective developments would be expected to overwhelm those schemes and hence would increase flood risk further to the south.

- 3.4 In relation to site 7(R), the advice is that the evidence suggests any SUDs/soakaway scheme serving development would in any event be overwhelmed by surface water flooding in its vicinity and its development would increase flooding downstream.
- 3.5 Advice upon whether site 6(R1) might assist in accommodating surface water drainage from site 7(R) was sought. It is considered that there is no potential for any SUDs/soakaway scheme in the area to the south of site 6(R1) also to serve site 7(R) because storm water flooding upon the lane would also pass into any culvert linking development on site 7(R) to 6(R1) and this would overwhelm any scheme, as indicated in paragraph 3.3 above.
- 3.6 In relation to site 6(R1), this may be drained by a SUDs/soakaway scheme in the area to its south provided this is not an area subject to surface water flooding. This would need to be shown as such by being tested in accordance with BRE 365 (Percolation test for surface water drainage). If soakaway testing failed at site 6(R1), then attenuation may be possible. The developer would need to consider the risks associated with surface water inundation of the attenuation site.
- 3.7 The consultation undertaken as a consequence of the new evidence suggests that the effect of new housing on site 7(R) would increase flooding downstream, raising the assessment to major adverse in relation to the storm water drainage criterion (6.1) and, given the importance of this consideration it is a significant constraint and the site ought not to be considered suitable as an allocation within the NDP. It is now recommended that site 7(R) should be excluded from consideration.
- 3.9 There is a possibility that a SUDs/soakaway scheme for surface water drainage from the development of site 6(R1) could be accommodated in that part of the area of site 6 excluded for landscape reasons. There is still some uncertainty that this is possible although it may not rule the site out totally at this stage of preparing the plan. In view of this, the effect on criterion 6.1 (storm water drainage) of the housing site assessment would be to increase it to at least adverse, which would give a score of 4. The effect of this change on the scoring matrix is shown at Appendix 2.
- 3.10 The advice from BBLs and evidence in relation to recent planning applications suggest that drainage management strategies, which may include percolation tests, will be required for many potential housing sites and these site specific and detailed requirements would be submitted with planning applications. As such, they may determine whether a site is deliverable. Should the plan be adopted, it subsequently be proven that a site or sites cannot be delivered and the required minimum level of proportional housing growth not be possible, then this may inform the need for and timing of a review of the NDP.

## **4. Ranking of Suitable Sites**

- 4.1 The effect of the above assessments is to amend Table 1 once again, which was previously amended in Addendum 1 (as Table 1A). Table 1(B) below presents the further amended table. The effect has been to remove site 7(R), revise the ranking

score for site 6(R1) from 90 to 93, and include site 11(R1) within the ranking of suitable sites.

- 4.2 The landowner of Site 11 has not withdrawn site 11(R) and the submission does make reference to it remaining available in the event that other suitable sites do not achieve the minimum required level of proportional housing growth. Consequently, it is retained within the ranking of sites.

**Table 1(B): Ranking of Sites Considered Suitable for Housing  
(Outstanding Minimum Target 51 dwellings – March 2021)**

<b>Rank Order</b>	<b>Site Reference</b>	<b>Ranking Score</b>	<b>Number of dwellings*</b>
1	Site 11(R)/11(R1)	81	40/19
2	Site 24(R)	86	5
3	Site 6(R1)	93	16
4	Site 32	97	5
5	Site 34	104	3
6	Site 26	106	3
7*	Sites 11(R) and 21 combined	110	65 to 100

\*Subject to decision under NPPF paragraph 172<sup>2</sup>

\* The estimate of dwellings is for the purposes of showing how Herefordshire Local Core Strategy target for the Parish might be met. It is possible that the number of dwellings may be higher or lower on some sites than indicated, depending upon the type of dwellings provided and unexpected constraints.

<sup>2</sup> 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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)

# APPENDIX 1: Additional Submission for Site 11

## SITE 11R - PROPOSAL

PROPOSE A MEDIUM SIZED SITE FOR UP TO 20 DWELLINGS & RETAIN OPPORTUNITIES FOR ADDITIONAL DWELLINGS TO MEET HOUSING TARGET

**NDP to Allow for Future Potential of 21 Dwellings...**  
 These could be subdivided into small sites of about 5 or six houses at a time.



INDICATIVE SITE LAYOUT

**NDP to allow for 19 Dwellings (max)**

**OR, possibly be developed as two smaller sites of 10 houses to suit housing demand.**

SITE 11R could be limited to no more than 19 dwellings as indicated in the adjacent sketches.

This allocation could be developed as a couple of small groups of up to 10 dwellings. Easier for medium sized developments to accommodate affordable housing than the smaller plots.

Reserves the opportunity for future development should other sites not achieve the target number of homes.

Avoids SSSI Impact Zone around Coughton Marsh Wood.

Public right of way (PROW) retains the open aspect with agricultural views to the west.

Maintains a visual gap characteristic between the northern and central clusters of the settlement.

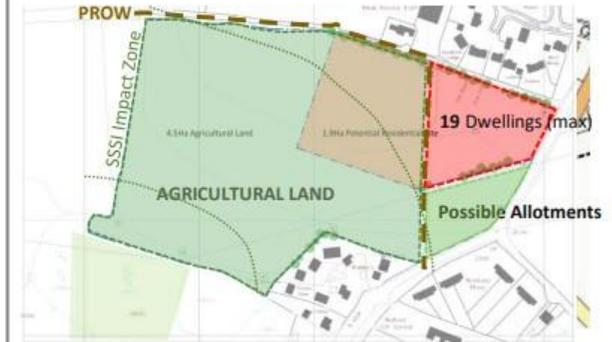
There is an opportunity for an allocation of allotments to the south, encompassed by the PROW and the main road.

Planning Condition could encourage a sustainable development, including allowance for affordable housing.

Additional dwellings could be planned as self build houses. Structural landscaping buffers can be incorporated along the western and southern boundaries, to provide controlled and natural screening from the B4234 and from the PROW.

Proximity to Cedar Grove compliments the existing visual aspect along B4234.

Outside SSSI Impact Zone



Maximises retained area of agricultural land to maintain the existing rural character of Coughton.

Allotments would maintain the visual Gap between settlements.

## Appendix 2: Revised Scoring Matrix for Site 6(R1)

<b>High Weighted Criteria</b>									
<b>Criterion No</b>	1.1	1.2	1.3	2.1	5.1	6.1	<b>Total</b>	<b>Weighted Score x 3</b>	
<b>Site Score</b>	4	4	4	1	1	4	18	54	
<b>Medium Weighted Criteria</b>									
<b>Criterion No</b>	2.2	7.1	7.2	7.3			<b>Total</b>	<b>Weighted Score x 2</b>	
<b>Site Score</b>	4	2	3	3			12	24	
<b>Low Weighted Criteria</b>									
<b>Criterion No</b>	3.1	3.2	4.1	4.2	5.2	5.3	<b>Total</b>	<b>Weighted Score x 1</b>	
<b>Site Score</b>	4	4	2	2	2	1	15	15	
<b>Total</b>									<b>93</b>