

Brockhampton Group Neighbourhood Development Plan

Housing site assessment

DJN Planning Limited

June 2019

For Brockhampton Group Parish Council

CONTENTS

1	Introduction	1
2	Housing requirement	2
	Herefordshire Local Plan Core Strategy	2
	Housing requirements and delivery to date	3
3	Housing land availability	3
	Neighbourhood Area and settlement context	3
	Strategic Housing Land Availability Assessment	4
	Locations identified in Questionnaire Survey 2018	5
	Call for Sites 2019	8
	Screening of sites against LPCS policy	8
4	Site assessments	13
	Approach to site assessment	13
	Summary of site assessments	14
5	Housing delivery	16
	Windfalls	16
	Site allocations	16
	Draft settlement boundaries	17
	Summary of housing delivery	17
	Conclusions	20
	Appendix 1: Call for Sites Site Submission Form and publicity	21
	Appendix 2: Site assessments	25
	11	

1. Introduction

- 1.1 Brockhampton Group Parish Council is preparing a Neighbourhood Development Plan (NDP) for the constituent parishes of Linton, Norton and Brockhampton. A Neighbourhood Area was designated in November 2017 and a Steering Group set up. A household questionnaire survey in October 2018 sought views on a range of matters including housing, the economy, the local environment and community services.
- 1.2 The next stage of work is to decide the approach to be taken to the delivery of new housing in the NDP, so as to meet the targets set by Herefordshire Council's (HC) Local Plan Core Strategy. This specifies Bringsty and Linton as settlements in the Neighbourhood Area which are to receive proportionate housing growth in the period up to 2031.

1.3 This report:

- reviews the strategic planning policies which apply to the provision of housing within the NDP, and confirms progress to date through dwelling completions and the grant of planning permissions (section 2);
- documents the approach which has been taken by the Steering Group to finding potential land for housing through a Call for Sites (section 3);
- assesses the sites which have come forward as a result. The focus is on sites which are within or adjacent to Bringsty and Linton, in accord with strategic planning policy (section 4); and
- recommends an approach for discussion with the Steering Group (section 5).
- 1.4 The report has been independently prepared for the Neighbourhood Plan Steering Group by Dr. D.J. Nicholson MRTPI.

June 2019

2. Housing requirement

Herefordshire Local Plan Core Strategy (LPCS)

- 2.1 Brockhampton Group of parishes is in the rural part of the Bromyard Housing Market Area, where the LPCS is seeking a minimum housing growth of 15% or 364 new dwellings between 2011 and 2031.¹ In delivering this growth, the LPCS provides for two tiers of rural settlements: those which are to be the "main focus" of housing development, and generally smaller "other settlements" where new housing will be appropriate.² The amount of new housing in these settlements is to be informed by the minimum growth target for the Housing Market Area.
- 2.2 The LPCS identifies both Bringsty and Linton as "main focus" settlements.
- 2.3 The expectation is that in these settlements the NDP "will allocate land for new housing or otherwise demonstrate delivery to provide levels of housing to meet the various targets, by indicating levels of suitable and available capacity". The LPCS targets are minimum requirements, so there can be no upper limit or cap on new housing. However, the NDP need only meet the minimum requirement to satisfy the strategic policy.
- 2.4 In cases where a parish or parish group has more than one identified settlement, the LPCS allows NDPs to distribute housing growth amongst the named settlements as seen fit. This flexibility gives scope for local factors such as settlement character and the availability of services to be considered.
- 2.5 The LPCS is seeking sustainable housing growth in or adjacent to villages, to enable development that can bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned. It is also concerned to avoid unsustainable patterns of development and new isolated homes in the countryside. These concerns are in line with national planning policy which requires policies to identify opportunities for villages to grow and thrive, especially where this will support local services, and to avoid the development of isolated homes in the countryside unless specified circumstances apply.⁴ To these ends, the LPCS requires the NDP to define "settlement boundaries (or a reasonable alternative)" for the villages of Bringsty and Linton, to define their main built form.⁵
- 2.6 LPCS policy RA3 sets out the exceptions under which residential development may come forward in Herefordshire's countryside outside the LPCS settlements.
- 2.7 In summary, the LPCS requires the NDP to:

¹ LPCS, policy RA1.

² LPCS, policy RA2.

³ Ibid.

⁴ LPCS, para. 4.8.23 and National Planning Policy Framework para. 78 and 79.

⁵ LPCS, para. 4.8.23.

- demonstrate how the minimum amount of new housing is to be delivered; and
- provide settlement boundaries or equivalent for the villages of Bringsty and Linton.

Housing requirements and delivery to date

- 2.8 The LPCS requires the NDP to demonstrate delivery of at least 30 new dwellings in the Neighbourhood Area for the period 2011-2031.
- 2.9 HC records show the following position for 1 April 2018 in terms of net new dwellings which have come forward since 2011 (i.e., allowing for any losses through demolitions):

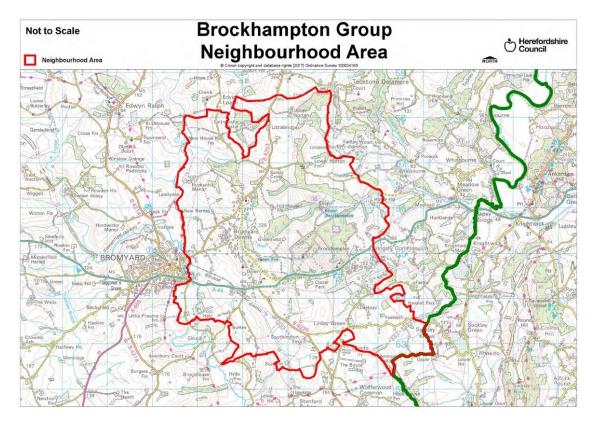
Completions - built 2011-2018: 4 dwellings Commitments – extant planning permissions for new residential units: 2 dwellings.

2.10 Taking these into account, as at 1 April 2018 there was a residual requirement for the NDP to demonstrate delivery of a minimum of 24 new dwellings in the period to 2031.

3. Housing land availability

Neighbourhood Area and settlement context

- 3.1 The Brockhampton Group Neighbourhood Area lies to the east of the market town of Bromyard and adjoins the County border with Worcestershire to the south-east (Plan 1). The A44 runs through the Area. There are two extensive areas of registered common land at Bromyard Downs and Bringsty Common. The latter straddles the Neighbourhood Area boundary, with part falling in Whitbourne parish which lies to the east.
- 3.2 The Neighbourhood Area is strongly rural in character with a dispersed pattern of settlement based around farmsteads and other small clusters of wayside development, or associated with the commons. Here, the typical pattern is for cottages to be scattered across or on the periphery of the common land, a distinctive pattern which reflects the historic exercise of commoner's grazing rights.



Plan 1: Brockhampton Group Neighbourhood Area

NORTH © Crown copyright and database rights (2019) Ordnance Survey (0100054661). Not to scale.

- 3.3 The LPCS identifies Bringsty and Linton as settlements which are to receive housing growth on the basis of technical work reported in a Rural Housing Background Paper. This sets out an approach to rural housing provision based on Housing Market Areas and which is intended to support both the LPCS and neighbourhood planning. For each of seven rural Housing Market Areas, settlements above the median size in terms of population are identified to provide the main focus of proportional housing development. The Paper explains that this is intended to be a locally-specific way of enhancing the social and economic sustainability of rural settlements.
- 3.4 For the Bromyard rural Housing Market Area, the Paper lists "Bringsty/Bringsty Common" and "Linton" as villages with 75 and 82 dwellings respectively. Both are above the median for the Housing Market Area (63). This provides the basis for the inclusion of Bringsty and Linton in LPCS policy RA2. Reference is also made in the Background Paper to local employment opportunities (Linton Trading Estate) and in the case of Bringsty to services (Brockhampton Primary School and the Live and Let Live public house).
- 3.5 Both settlements have a dispersed character rather than a nucleated village form. They comprise land and buildings within Linton parish as follows:
 - The settlement of Linton is situated in the west of the parish to the north and south of the A44. To the north of the main road there is residential development at Union Lane and Linton Villas. To the south is Linton Court, a former hospital building of 53 residential units. There is also an area of ex-Council housing served by the B4220 Malvern Road. Linton Trading Estate lies to the west of Linton Court, from which it is separated by the route of the former Bromyard and Linton Light Railway.
 - The settlement of Bringsty lies on and adjacent to Bringsty Common, which is bisected by the Neighbourhood Area boundary. The western part of the Common is in the Brockhampton Neighbourhood Area. There are clusters of dwellings surrounded by common land, together with other dwellings adjoining the common to the west. Taking the Common as a whole accounts for the scale of the settlement in terms of number of dwellings as it is identified in the Rural Housing Background Paper.

Strategic housing land availability assessment (SHLAA)

3.6 The SHLAA is an ongoing County-wide assessment of the potential availability of land for housing undertaken by HC. The latest iteration is the March 2019 Rural Report. This mainly deals with rural settlements which are not undertaking a Neighbourhood Development Plan. Bringsty and Linton have never been considered in the SHLAA process, either in the March 2019 Report or earlier editions, so there is no information to draw on from this source in undertaking this Assessment.

⁶ Herefordshire Council, Rural Housing Background Paper, March 2013.

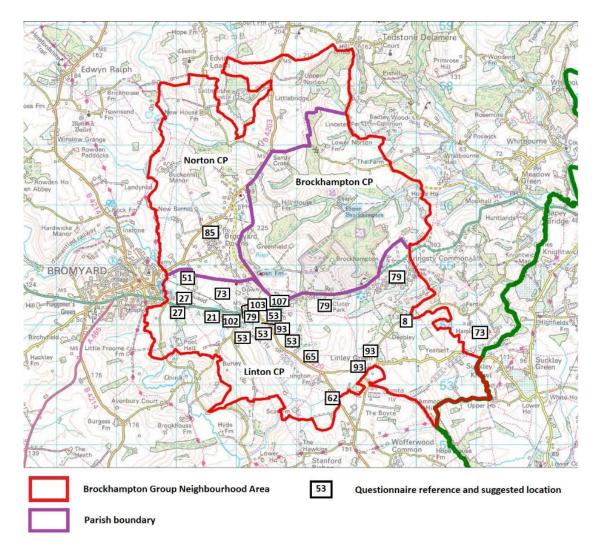
⁷ Herefordshire Council, Strategic Housing Land Availability Assessment, Rural Report, March 2019.

Locations identified in Questionnaire Survey 2018

- 3.7 The questionnaire survey included a question about the location of new housing:
 - Are there any locations in or adjacent to Bringsty or Linton that you think are suitable for new homes? If so, where, and why? Please tell us below. You can mark any locations on the enclosed map of the Neighbourhood Area remember to return it with your questionnaire.
- 3.8 There were 48 responses to this question (43% of respondents). Specific locations were suggested in 29 responses. Of these, 14 households returned their copy of the supplied Neighbourhood Area map marked-up with suggested locations for new homes. These locations are indicated by the questionnaire reference number on Plan 2. All locations are indicative. The majority of identified locations are in Linton parish.
- 3.9 Overall, the locations identified on the marked-up maps and in text are generally associated with the A44 and B4220 corridors running through the Neighbourhood Area, particularly in respect of the south side of the A44 between Bromyard and the B4220. The view was expressed that "small-scale developments in these types of areas would relieve the need to find plots in more rural locations".

3.10 The suggested locations include:

- Linton Trading Estate and adjacent land (although there was one comment "please avoid any new housing and opening onto the A44 between Bromyard town and industrial site at Linton")
- Adjacent to Bromyard e.g. at Petty Bridge
- A44/B4220 Malvern Road junction
- Adjacent to Malvern Road council houses
- Linley Green
- Clater Farm
- Edge of Bringsty Common.



Plan 2: Questionnaire survey - suggested locations for new homes

NORTH © Crown copyright and database rights (2019) Ordnance Survey (0100054661). Not to scale.

- 3.11 A further 12 comments suggested general criteria to be used in locating new homes. These included:
 - amongst existing properties
 - on sites with good road access, to avoid increasing traffic on narrow lanes
 - to respect the biodiversity interest of Bringsty
 - to avoid land liable to flood
 - on brownfield land
 - redundant farm buildings
 - use of National Trust redundant barns to provide housing for rent
 - smaller, cheaper homes.

- 3.12 Proximity to the services and facilities offered by Bromyard was identified in five responses as a locational factor: "as close to Bromyard as possible ... close to amenities, less impact on the rural environment".
- 3.13 Further details of these responses can be found in the Results Report and Comment Listings.8

Call for Sites 2019

- 3.14 Following consideration of these responses to the questionnaire survey, the Steering Group decided to undertake a Call for Sites to provide a transparent, consistent and equitable process to register and confirm sites for consideration. The exercise also enabled initial information on sites to be sought from landowners and others. In designing the process, regard was had to HC guidance.⁹
- 3.15 The Call for Sites was carried out during January and February 2019. The Parish Clerk managed the process and acted as a point of contact. The Call for Sites exercise comprised:
 - Giving advance notice of the Call for Sites in the October 2018 questionnaire survey;
 - The preparation of a Site Submission Form, based on that suggested by HC in the guidance referred to above (copy at Appendix 1);
 - Identifying relevant landowners through the local knowledge of Steering Group members, and advising them by letter/email of the Call for Sites;
 - Advertising the Call for Sites on the home page of the Group Parish Council website.
 The Site Submission Form could be downloaded from the website;
 - Publicity in Bromyard Information Online; and
 - Display of a poster on Parish noticeboards and the Parish Council website (copy at Appendix 1).
- 3.16 A total of 13 sites were submitted (Table 1 and Plan 3).

Screening of sites against LPCS policy

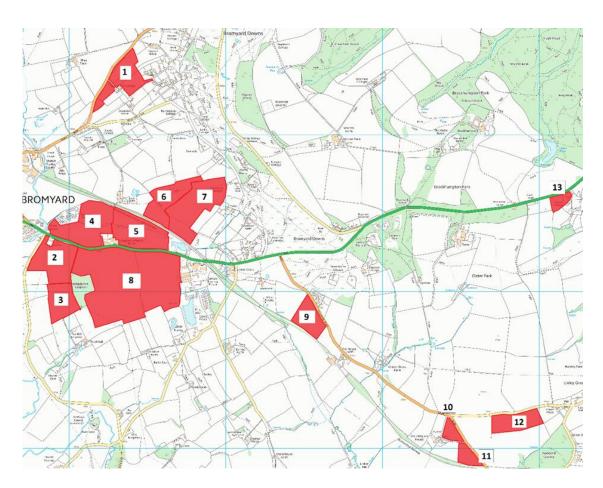
3.17 The Call for Sites submission form referred to the fact that Herefordshire Council had earmarked Bringsty and Linton as areas with scope for housing development in the Brockhampton Group Neighbourhood Area, and advised that submitted sites should be able to demonstrate that they met this locational requirement. Sites were also required to have a clear relationship to existing development e.g. be adjacent. These stipulations were intended to reflect the provisions of national planning policy and LPCS policies RA2 and RA3, and so to help ensure that the NDP would be in general conformity with the LPCS – one of the "basic conditions" that must be satisfied.

Brockhampton Group Parish Council, NDP Results Report and Comment Listings, January 2019.

⁹ Herefordshire Council, Neighbourhood Planning Guidance Note 21, Guide to site assessment and choosing allocation sites, June 2015.

Site ref	Name
1	Land at Norton
2	Land at Hodgebatch Manor 1
3	Land at Hodgebatch Manor 2
4	Land at Hodgebatch Manor 3
5	Land at Hodgebatch Manor 4
6	Land at Hodgebatch Manor 5
7	Land at Hodgebatch Manor 6
8	Land west of Linton Trading Estate
9	Land at Malvern Road
10	Land east of Southington House
11	Land south-east of Southington House
12	Land west of Church House, Linley Green
13	Land at The Bannut

Table 1: All sites submitted to Brockhampton Group NDP Call for Sites 2019.



Plan 3: All sites submitted to Brockhampton Group NDP Call for Sites 2019.

NORTH © Crown copyright and database rights (2016) Ordnance Survey (0100054661). Not to scale.

- 3.18 To ensure these requirements can be met, the submitted sites have been screened in terms of their degree of fit with the LPCS approach. In doing so, regard has been had to the established built form and character of the LPCS settlements, including their size, role and function, and to HC guidance. For housing in settlements outside Hereford and the market towns, strategic planning policy requires new residential development to be located within or adjacent to the main built up area(s) so as to avoid unnecessary isolated, non-characteristic and discordant dwellings which would adversely affect settlement character and setting, and its local environment.¹⁰
- 3.19 A further issue to be considered is whether there could be strategic policy grounds to support the allocation of land in the NDP to meet the needs of Bromyard, which lies immediately to the west of the Neighbourhood Area.
- 3.20 The LPCS recognises the need to allow for the continued development of Bromyard, taking into account its needs, opportunities and constraints. Landscape constraints are a factor all around the town, ¹¹ whilst to the east flood risk associated with the River Frome is also recognised. Development is proposed to the north-west of Bromyard (policy BY2). In the east however the Frome and the line of the former Bromyard and Linton Light Railway serve as a green infrastructure corridor. There is also a green infrastructure enhancement zone identified on the eastern periphery which takes in land between the A44 and the B4203 and includes the former railway corridor and the Frome. ¹²
- 3.21 These strategic proposals extend into the Neighbourhood Area and will need in due course to be reflected in the policies of the NDP. For the purposes of this Assessment, the strategic direction for housing growth at Bromyard to meet the needs of the town does not lie in the direction of the Neighbourhood Area. Indeed, the LPCS focus is on environmental protection and enhancement to the east of the town, reflecting the floodplain of the River Frome, the opportunity offered by the line of the former railway and the high landscape value associated with the river valley and the Bromyard Downs. In short, there is no suggestion that housing to meet the needs of Bromyard should be sought through the NDP.
- 3.22 Taking these factors into account, it is apparent that a number of the submitted sites do not have the sought-after relationship with the LPCS settlements of Bringsty and Linton, even allowing for the dispersed character of these villages. As such the sites should be regarded as lying in the countryside for the purposes of applying LPCS policy RA2, as explained below. They are not considered further in this Assessment.

¹⁰ LPCS policy RA2 and para. 4.8.16.

¹¹ Herefordshire Council, Urban Fringe Sensitivity Analysis; Hereford and the Market Towns, January 2010.

¹² See Herefordshire Council, Green Infrastructure Strategy, February 2010

Site 1, Land at Norton.

- 3.23 Site 1 comprises several parcels of agricultural land to the north-east of Bromyard, adjoining the B4203. They have no relationship to the identified LPCS settlements of Bringsty or Linton.
- 3.24 This lack of relationship is implicitly acknowledged by the landowners' agent who has suggested in email correspondence with the Parish Clerk that it is open to the Steering Group/Parish Council to allocate land adjacent to other settlements and for the NDP to still be in general conformity with the LPCS, subject to local justification. National Planning Practice Guidance is referred to in support of this suggestion. This states that a Neighbourhood Plan can allocate additional or alternative sites to those in a Local Plan under certain conditions. The Guidance has been recently revised, including in respect of settlements in rural areas.
- 3.25 The LPCS only identifies those settlements where sustainable housing growth is to be supported together with a minimum level of housing delivery. It does not allocate any sites in the Brockhampton Neighbourhood Area, leaving this task entirely to the NDP. Hence the question of allocating "additional or alternative sites" to those in the Local Plan does not arise. It is open to the NDP to provide for more housing than the minimum, including through allocation, but the expectation is that such sites should be in or adjacent to the identified settlements. In this respect, this Assessment recommends sites for allocation at Bringsty and Linton which will allow the required level of new housing to be provided. There is no justification or need to consider land further afield.
- 3.26 The submission highlights the close proximity of site 1 to Bromyard. However, the site is separated from the town by the River Frome floodplain corridor and as stated above the LPCS promotes environmental protection and enhancement to the east of Bromyard, not development.

Sites 2-4, 6 and 7, Land at Hodgebatch Manor.

3.27 These sites comprise parcels of agricultural land north and south of the A44. They lie in open countryside between Bromyard and Linton. Sites 2, 3 and 4 are separated from Bromyard by the river corridor and as established the focus of the LPCS on this side of the town is on environmental protection and enhancement, not development. They also form part of the immediate landscape setting of the town and are readily visible as rising land from for example Sherford Street. Sites 3, 6 and 7 have no frontage to adopted highway. The remaining Hodgebatch Manor site (site 5) which is the nearest to Linton is considered further in the following section.

¹³ Planning Practice Guidance Paragraph: 044 Reference ID: 41-044-20160519

Sites 10, Land east of Southington House; 11, Land south-east of Southington House; and 12, Land west of Church House, Linley Green.

3.28 These sites comprise separate parcels of agricultural land west of Linley Green, served either from the B4220 or the C1137. They have no relationship to either Bringsty or Linton and lie in the open countryside, relatively remote from services and facilities.

4. Site assessments

Approach to site assessment

- 4.1 Site assessments have been undertaken having regard to advice and guidance available from HC,¹⁴ the approach taken in the latest Herefordshire SHLAA,¹⁵ and to National Planning Practice Guidance (NPPG).¹⁶ In line with NPPG, the aim has been to provide proportionate, robust evidence to support the choices made and the approach taken. NPPG advises that in allocating sites for development qualifying bodies should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.¹⁷ To this end sites have been assessed using a standard assessment form, based on a model version prepared by HC and modified for the local circumstances. Completed assessment forms can be found at Appendix 2, and the results are summarised below.
- 4.2 Information on each site has been collected through a combination of desk-based research and site visit. The principal aspects covered are as follows:
 - site size, boundaries, and location;
 - current land use and character;
 - adjacent land uses and character of surrounding area;
 - physical features / constraints, such as access, topography, flooding and natural features of significance
 - planning, heritage and environmental designations and allocations
 - planning history.
- 4.3 In respect of agricultural land quality, the NPPF advises that planning policies should recognise the economic and other benefits of the best and most versatile agricultural land. The farmland east of Bromyard is generally of grade 2 (Good) and 3 (Good to Moderate) quality. This is a factor to be borne in mind when taking decisions particularly in respect of the larger sites comprising farmland.
- 4.4 The focus is on assessing the suitability of sites for housing development. Sites 5 and 8 are also proposed for employment purposes in the Call for Sites submissions. However, there is no requirement for the NDP to allocate land for employment purposes. Herefordshire Council are preparing a Development Plan Document for Bromyard and Winslow parish to deliver on strategic policy BY1, including 5 ha of new employment land. A call for employment sites was undertaken in October 2017.

Brockhampton Group NDP · Housing site assessment

¹⁴ Herefordshire Council, Neighbourhood Planning Guidance Note 21, Guide to site assessment and choosing allocation sites, June 2015.

¹⁵ Herefordshire Council, Strategic Housing Land Availability Assessment, Rural Report, March 2019.

¹⁶ https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment

¹⁷ NPPG, paragraph: 042 Reference ID: 41-042-20170728

- 4.5 In considering whether sites are potential candidates for housing allocation, regard has been had to their suitability, availability and achievability, as follows:
 - the suitability of sites has been assessed having regard to such factors as planning policy restrictions, physical factors, potential impacts of development, current environmental conditions, and relationship to the existing settlement pattern;
 - availability is as evidenced in the Call for Sites submissions; and
 - achievability has been assessed as to whether there is a reasonable prospect that the site will be developed for housing at a particular point in time. At a site level, this may be influenced by factors such as unusual site costs, market or delivery factors. Overall, assessment undertaken for the LPCS has demonstrated the viability of housing development (including policy-compliant affordable housing provision). ¹⁸ Smaller sites of up to 30 dwellings in the higher market value areas (which includes the Neighbourhood Area) are shown to generate the largest residual values.
- 4.6 Where estimates of site capacity in terms of numbers of dwellings have been made, the approach used in the latest SHLAA has been followed. This takes account of any evidence provided in site submissions and other local information pertinent to the site. A density of 25 dwellings per hectare, the mid-point of the range of 20-30 dph used in the SHLAA, is taken as a starting point.
- 4.7 In the rural context, sites may be initially identified/submitted as existing field parcels whose overall development would be of a disproportionate scale to prevailing character. In these cases, an assessment has been made of an appropriate extent of development taking into account site factors and local character.
- 4.8 A concluding summary assessment provides a basis for recommendations as to whether the site should proceed to public consultation as a potential option or be discounted from further consideration at this stage.

Summary of site assessments

Site 5, Land at Hodgebatch Manor 4

4.9 This site to the east of Hodgebatch Manor Farm is not suitable for development in whole or in part, because of its overall scale, poor relationship to existing areas of settlement at Linton which lie to the east of the Trading Estate, and the visual impacts and harm to landscape character which would rise. Development would not be well-related to the existing settlement pattern even taking into account its dispersed nature.

¹⁸ Herefordshire Council, Whole Plan Viability Assessment, Three Dragons, May 2014.

Site 8, Land west of Linton Trading Estate

4.10 This site is not suitable for development in whole or in part, because of its overall scale, poor relationship to existing areas of settlement at Linton which lie to the east of the Trading Estate, the risk of exposure to existing sources of noise and of compromising future activity at the Trading Estate, and the visual impacts and harm to landscape character which would arise. Development would not be well-related to the existing settlement pattern even taking into account its dispersed nature.

Site 9, Land at Malvern Road

4.11 Whilst this site overall is of excessive scale in relation to proportionate housing requirements, it does have potential for a partial release in the north, opposite existing housing. Historic field boundaries inform identification of an area for allocation for up to 20 dwellings. Eight of these should be provided as affordable units (a mix of intermediate housing, affordable rent and social rent). The area for allocation is both suitable and available for development, with a reasonable prospect that it will be developed for housing within 5 years. It has an optimal relationship to the existing housing opposite, is reasonable accessible to local employment and services, and does not compromise the continued agricultural use of the remainder of the overall site. The route of the former railway, an acknowledged green infrastructure asset, forms the southern boundary to the site; in the longer term, and in conjunction with other proposals, this offers potential for sustainable access to Bromyard.

Site 13, Land at The Bannut

4.12 The Bannut is part of a cluster of dwellings on the western edge of Bringsty Common. It is both suitable and available for development, with a reasonable prospect that it will be developed for housing within 5 years. There is reasonable access to local employment and services. Provision of up to a further five dwellings will reflect the existing site character and ensure that the scheme is well-related to the dispersed settlement pattern.

5. Housing delivery

- 5.1 The NDP is required to demonstrate how the minimum amount of new housing required by the LPCS is to be delivered, and to define settlement boundaries for Bringsty and Linton. The recommended approach comprises:
 - Making due allowance for existing completions and commitments, as detailed above in section 2;
 - adoption of an allowance for windfalls;
 - the allocation of land for housing development; and
 - the drawing of settlement boundaries for the two LPCS settlements.

Windfalls

- 5.2 An allowance may be made for windfall sites, provided there is compelling and realistic evidence that they will provide a reliable source of supply and having regard to historic delivery rates and expected future trends. Windfalls are sites (or dwelling units) which have not been specifically identified as available in the Local Plan/NDP process.
- 5.3 From 2011 to 2018, windfall delivery (completed or with planning permission) stands at six units. It is expected that such planning permissions will continue to be granted as proposals arise, provided they comply with the planning policies in the LPCS and the NDP. In the local context they are most likely to come forward as proposals for the re-use of former agricultural buildings or as deemed permission for change of use of agricultural buildings. For instance, the Call for Sites submission for Hodgebatch Farm identifies the potential of redundant farm buildings.
- 5.4 In terms of demonstrating housing delivery, it is legitimate to make an allowance for future windfalls. A reasonable and conservative estimate would be for the level of windfalls seen since 2011 to be matched over the remainder of the plan period to 2031, i.e. a further six units. This is equivalent to a delivery rate of around half that seen in the recent past.

Site allocations

5.5 Site allocation is a robust means of showing capacity to deliver new housing. Allocation within a Plan also enables the preparation of an accompanying planning policy to guide development, offering certainty to both the local community and developers as to the planning requirements that a future proposal will need to address in order to be granted planning permission. Moreover, national planning policy gives weight to the allocation of sites for housing in NDPs, since in certain circumstances such plans will continue to be considered up-to-date even though a five-year supply of deliverable housing sites cannot be demonstrated by the local planning authority.¹⁹

National Flamming Folicy Framework, paragraph 14.

Brockhampton Group NDP · Housing site assessment

¹⁹ National Planning Policy Framework, paragraph 14.

- 5.6 The site assessments carried out on the Call for Sites submissions have identified two available sites as suitable for development. They are recommended for consideration for allocation in the NDP:
 - Site 9, Land at Malvern Road (20 units)
 - Site 13, Land at The Bannut (5 units)

Draft settlement boundaries

5.7 Settlement boundaries have been drafted for Bringsty (Plan 4) and Linton (Plan 5). These have been drawn having regard to criteria in HC guidance, ²⁰ as well as to the individual site assessments. No previous settlement boundaries were established in the former Unitary Development Plan for either settlement (the boundary of Linton Trading Estate was shown an UDP Inset Map, and this has been taken into account). The boundaries generally follow road lines and property/physical boundaries. In certain cases, the boundaries cut across property boundaries where there is a need to exclude land which if developed could harm settlement character. Plans 4 and 5 also indicate the proposed housing sites.

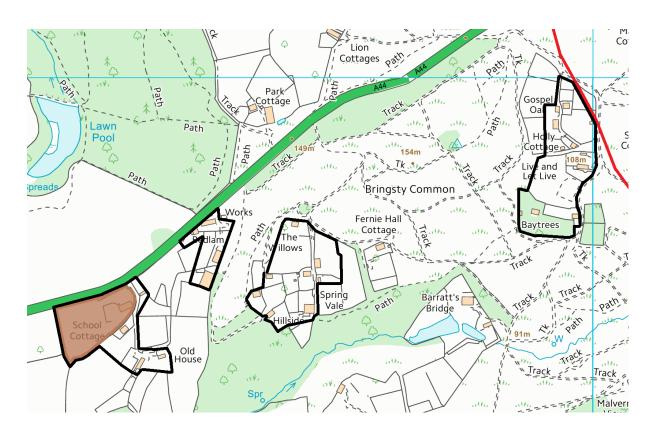
Summary of housing delivery

5.8 The overall position on housing delivery is summarised in Table 2. The minimum LPCS housing target is met, the available headroom providing surety of delivery against the possibility that sites may not come forward as expected.

BROCKHAMPTON GROUP NEIGHBOURHOOD AREA HOUSING REQUIREMENT 2011-2031	30
Dwellings completed 2011-2018	4
Dwellings with planning permission	2
Proposed site allocations at Bringsty and Linton	25
Windfall allowance	6
POTENTIAL TOTAL HOUSING DELIVERY	37

Table 2: Housing Delivery, Brockhampton Group Neighbourhood Area.

²⁰ Herefordshire Council, Neighbourhood Planning Guidance Note 20, Guide to settlement boundaries, June 2015.



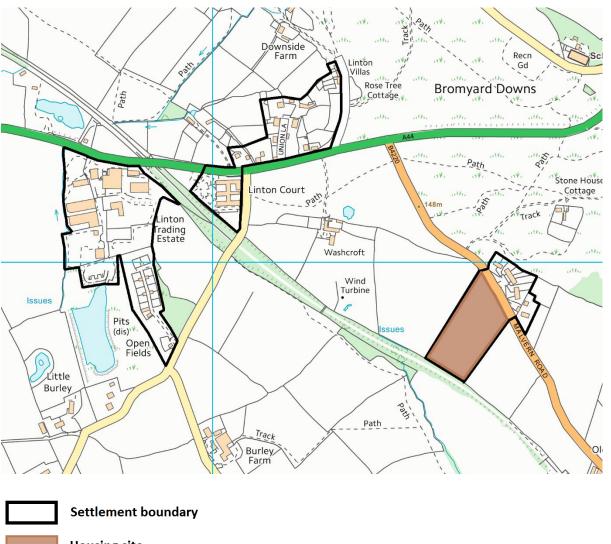
Settlement boundary

Housing site

Brockhampton Group Neighbourhood Area

Plan 4: Draft settlement boundary for Bringsty

NORTH © Crown copyright and database rights (2019) Ordnance Survey (0100054661). Not to scale.



Housing site

Plan 5: Draft settlement boundary for Linton

NORTH © Crown copyright and database rights (2019) Ordnance Survey (0100054661). Not to scale.

Conclusions

- 5.9 It is recommended that the minimum housing requirement for the Neighbourhood Area be delivered by:
 - allowing for residential completions and commitments;
 - allocating land at Bringsty and Linton for residential development;
 - making an allowance for future windfall residential development in the Neighbourhood Area; and
 - drawing settlement boundaries for Bringsty and Linton.
- 5.10 The allocations of land for housing in the Plan will be supported by planning policies which will guide their development and that of schemes coming forward as windfalls throughout the Neighbourhood Area. These policies will need to reflect and deliver as far as possible on some of the key themes in the questionnaire survey including ensuring development respects the local context through careful design. The assessments reported here have identified some of the key considerations in respect of the proposed sites themselves.
- 5.11 The focus of this Housing Site Assessment has been with meeting the minimum LPCS requirements and on the suitability of sites for development. This is only part of the process of developing the NDP's housing policies. The questionnaire survey identified a range of community concerns about securing the right size, mix and type of housing. These included a preference for smaller, 2- or 3-bedroom property over larger dwellings; for smaller rather than larger schemes; an interest in live-work units and self-build homes; and for affordable or cheaper housing (for which size may be seen as a proxy).
- 5.12 The scope for providing affordable housing, as this term is understood in planning terms, is generally limited on open market sites in the rural areas of Herefordshire. This is because under LPCS policy such provision can only be required on schemes of more than 10 units, ²¹ and many rural sites do not qualify. However, the proposed allocation at Linton is above this threshold and will deliver eight affordable units, providing a valuable opportunity in meeting community concerns.
- 5.13 Other aspects of dwelling size, mix and type may be addressed in policy. Evidence is available from HC on the size (number of bedrooms) of both market and affordable dwellings that are required locally,²² and this may be used in conjunction with survey replies to inform a suitable NDP policy on meeting housing requirements. Such aspects as self-build and live/work may also be encouraged, including on the allocation sites.

²¹ LPCS policy H1. Affordable housing is defined in the National Planning Policy Framework as housing for sale or rent for those whose needs are not met by the market. Under national policy, affordable housing may be sought on sites of 10 or more homes or with an area of 0.5 hectares or more.

²² HC, Herefordshire Local Housing Market Assessment 2012 update.

APPENDIX 1: Call for Sites Site Submission Form and publicity

Site Submission Form

Call for Sites poster

Brockhampton Group Neighbourhood Development Plan 2011-2031



Call for Sites Site Submission Form

As part of the preparation of the Neighbourhood Development Plan, Brockhampton Group Parish Council is looking at the potential availability of land for new housing and other development at Bringsty and Linton.

This form should be used to identify potential sites for consideration for inclusion in the Neighbourhood Development Plan. Sites will be assessed in terms of their suitability. The submission of a site does not mean it will necessarily be included in the Neighbourhood Development Plan.

Herefordshire Council has earmarked Bringsty and Linton as areas with scope for housing development in the Brockhampton Group Neighbourhood Area. Submitted sites should be able to demonstrate they meet this locational requirement. Sites should also have a clear relationship to existing development e.g. be adjacent.

Please use a separate form for each site and complete the form to the best of your knowledge. Sites submitted to the Parish Council in response to this Call for Sites will be in the public domain and the information given will not be treated as confidential.

A scale map (preferably at 1:1250) showing the exact site location and boundary marked in red must be submitted. Sites will not be registered in the absence of this information.

PLEASE RETURN YOUR FORM(S) BY 28 FEBRUARY 2019

YOUR DETAILS:

Title:Name:
Organisation/company: (If applicable)
Address
Postcode:
Tel NoEmail:
AGENT'S DETAILS: (if applicable)
······································
Agent's Name:
Address
Postcode:
Tel NoEmail:
1. Site Information
Site address:
OS Grid reference:
Site area:
Site area:
Site area: What is your interest in the land? (e.g. landowner, potential developer)

2. Site Description		
Existing land use:		
City descriptions		
Site description:		
Description of the control of the co	Hausina D. Essalaumant D.	
Proposed use:	Housing ☐ Employment ☐	
(Please tick the appropriate box)	Other fellows and the	
	Other (please specify)	
3. Timescales	_	
Likely timeframe for development:	0-5 years	
(Please tick the appropriate box)	6-10 years	
	11+ years	
4. Site Details		
Access to an adopted highway (please describe	e):	
Vegetation on the site (e.g. trees, hedgerows):		
Hydrological features (e.g. streams, watercour	rses):	
Other on-site features or development constra	aints (e.g. particular landscape features, existing buildings, etc.):	
Does the site have access to utility services? (e.g. gas, electricity, water, sewerage):		
Are you aware of any legal constraints on the	and e.g. restrictive covenants within or adjacent to the site?:	
Does the site have any relevant planning histo	ry?:	
Are you aware of any site contamination issue	s? Yes No No	
If yes, please give details:		
Does the landowner(s) support the developme	ent of the site? Yes □ No □	
Please confirm here if you consent to us retai	ning your contact details and contacting you in respect of the	
Neighbourhood Development Plan:		
Yes □ No □		
Signature:	Date:	
-		
Completed site submission forms including site plan must be returned by 28 February 2019 to the Parish Clerk,		
David Hunter-Miller preferably via email to brockhamptongroup@gmail.com or telephone 07513 122918.		
The second of th		
Further copies of this form may be obtained a	at <u>brockhamptongrouppc.org.uk/neighbourhood-development-plan/</u>	
or from the Parish Clerk.		

The personal information you provide on this form will be processed in accordance with the requirements of the General Data Protection Regulations. It will be used only for the preparation of the Neighbourhood Development Plan. The site information gathered will be processed and information will be published relating to sites, but will not include personal details. See http://brockhamptongrouppc.org.uk/policies-and-procedures/ for further information.



Brockhampton Group Neighbourhood Development Plan 2011-2031

Call for Sites

Do you own land which you may wish to bring forward for development by 2031?

If so, we want to hear from you

The Parish Council is looking for land in or adjacent to **Bringsty** and **Linton** which could be included in the Neighbourhood Development Plan to help meet housing and other needs up to 2031.

For further information including a Site Submission Form, see http://brockhamptongrouppc.org.uk/neighbourhood-development-plan/

If you have land which you think might be of interest, please get in touch. Completed site submission forms must be returned by 28 February 2019.

To hear about the results of our recent household survey, come along to the next NDP Steering Group meeting: **6.00 p.m. on Wednesday 20th February** at the Bromyard and Winslow Town Council offices, Rowberry Street, Bromyard. There is also a summary of the results on the Parish Council website.

Tamla Bowdler
Chair NDP Steering Group

Website: http://brockhamptongrouppc.org.uk/

Brockhampton Group NDP · Housing site assessment

APPENDIX 2: Site assessments

Site Assessment Forms for:

Site ref	Name
Site 5	Land at Hodgebatch Manor 4
Site 8	Land west of Linton Trading Estate
Site 9	Land at Malvern Road
Site 13	Land at The Bannut

Site Assessment: Site 5, Land at Hodgebatch Manor 4

Site information		
Reference	Site 5.	
Name/address	Land at Hodgebatch Manor 4.	
Area (hectares)	6.7.	
Existing use	Agricultural (pasture).	
Previously developed?	No.	
Adjacent land uses	A44 to S, former brickworks and pond to E, agricultural land and Hodgebatch	
	Manor Farm to W, former railway line to N.	
Ownership	Single.	

Site features	
Boundaries	Hedgerow/boundary trees. Mature planting to N along former railway line.
Other site features /	Site crossed by watercourse draining to W, and including mature planting.
constraints	
Topography	Site falls generally to NW.

Accessibility / infrastructure	
Highway access	Frontage to A44.
Public right of way?	None.
Other infrastructure /	Mains services stated to be available.
services	

Former UDP, LPCS and planning history	
Former UDP	No specific proposals/proposals map notation.
LPCS	No policy map notation. The former railway line is a local strategic corridor in the Council's Green Infrastructure Strategy. The corridor runs across the north of the site.
Planning history	None.

Heritage assets	
Conservation Area	None.
Listed buildings	None.
SAM	None.
Other heritage	None.

Environmental information		
Landscape type	Principal Settled Farmlands.	
TPO	None.	
Biodiversity sites and	None on site. Information on ecological interests of land to the east and north	
habitats	east of the site has been supplied by a member of the NDP Steering Group.	
Flood risk	Flood Zone 1 (low probability).	
Other	None.	

Site assessme	nt
Suitability	This site comprises farmland to the east of Hodgebatch Manor Farm, between the former railway line (an acknowledged green infrastructure asset) and the A44, and extending towards Linton as far as the former brickworks. Local employment at Linton Trading Estate lies to the south east across the A44, and the primary school is 1.5 km to the east via the main road. The site has a poor relationship to existing development, even allowing for the dispersed pattern of settlement which is characteristic of the locality. The eastern part of the site is nearest to settlement areas at Linton, but is still clearly separate; and housing areas at Linton are all situated to the east of the Trading Estate. This is also the most elevated and exposed part of the site where any development would be visually intrusive in the context of the surrounding landscape. Overall, these factors militate against its suitability.
Availability	The Call for Site submission confirms the site is available for housing and employment within 6-10 years.
Achievability	There is no evidence of site factors which would adversely impact on delivery and so there is a reasonable prospect that the site or part thereof could be developed in the stated timeframe.
Development potential	The overall site extends to 6.7 ha., the development of which would be excessive in relation to the requirement to deliver proportionate and sustainable housing growth. The location of local services and facilities would suggest any partial release would be best placed in the east of the site. However, development should not be supported having regard to considerations of settlement pattern and landscape and visual impacts.
Concluding assessment	This site to the east of Hodgebatch Manor Farm is not suitable for development in whole or in part, because of its overall scale, poor relationship to existing areas of settlement at Linton which lie to the east of the Trading Estate, and the visual impacts and harm to landscape character which would rise. Development would not be well-related to the existing settlement pattern even taking into account its dispersed nature.

Site Assessment: Site 8, Land west of Linton Trading Estate

Site information		
Reference	Site 8.	
Name/address	Land west of Linton Trading Estate.	
Area (hectares)	26.3.	
Existing use	Agricultural (arable).	
Previously developed?	No.	
Adjacent land uses	A44 to N, Linton Trading Estate to E, agricultural land to S and W, Hodgebatch	
	Coppice to W.	
Ownership	Single.	

Site features	
Boundaries	Hedgerow/boundary trees.
Other site features /	Internal hedgerow boundary. Site crossed in SW by overhead power lines.
constraints	
Topography	Site levels rise S from the A44.

Accessibility / infrastructure		
Highway access	Frontage to A44, with adjoining field accesses.	
Public right of way?	The western part of the site is crossed N/S by public footpath LTB1.	
Other infrastructure /	Water main stated to run through site and access to electricity and mains	
services	sewerage.	

Former UDP, LPCS and planning history		
Former UDP	No specific proposals/proposals map notation.	
LPCS	No policy map notation.	
Planning history	None.	

Heritage assets	
Conservation Area	None.
Listed buildings	None.
SAM	None.
Other heritage	None.

Environmental information	
Landscape type	Principal Settled Farmlands.
TPO	None.
Biodiversity sites and habitats	None on site. Hodgebatch Coppice (adjoining) is ancient and semi-natural woodland and a Priority Habitat Inventory site (deciduous woodland). There is also adjoining traditional orchard to SW.
Flood risk	Flood Zone 1.
Other	None known.

Site assessme	nt
Suitability	This site comprises farmland to the west of Linton Trading Estate. The primary school is 1.5 km to the east via the main road. Levels rise from the A44, so that the site as a whole is both elevated and exposed in the context of the surrounding landscape. Housing development in the eastern part of the site, adjacent to the Trading Estate, would be nearest to settlement areas and services but would risk exposure to existing sources of noise associated with the industrial premises, as well as road traffic noise from the A44, and could unacceptably compromise future activity at the Estate. Planning permission for residential development adjoining the Trading Estate was refused in 2014 (and upheld at appeal) on noise grounds (land adjacent to Linton Court, LPA ref. P132643/F); an appeal was dismissed. Housing areas at Linton are all situated to the east of the Trading Estate. The site has a poor relationship to existing development, even allowing for the dispersed pattern of settlement which is characteristic of the locality. Overall, these factors militate against its suitability.
Availability	The Call for Site submission confirms the site is available for housing and employment in the 6-10 and 11+ years periods.
Achievability	There is no evidence of site factors which would adversely impact on delivery and so there is a reasonable prospect that the site or part thereof could be developed in the stated timeframe.
Development potential	The overall site extends to 26.3 ha., the development of which would be excessive in relation to the requirement to deliver proportionate and sustainable housing growth. Generally, there are concerns in respect of landscape and visual impacts and the relationship to the existing settlement pattern. Any partial release would be best placed in the east of the site, but potential here is further restricted having regard to considerations of exposure to existing sources of noise and the risk of compromising future activity at the Trading Estate.
Concluding assessment	This site is not suitable for development in whole or in part, because of its overall scale, poor relationship to existing areas of settlement at Linton which lie to the east of the Trading Estate, the risk of exposure to existing sources of noise and of compromising future activity at the Trading Estate, and the visual impacts and harm to landscape character which would arise. Development would not be well-related to the existing settlement pattern even taking into account its dispersed nature.

Site Assessment: Site 9, Land at Malvern Road

Site information	
Reference	Site 9.
Name/address	Land at Malvern Road.
Area (hectares)	3.0.
Existing use	Agricultural (pasture).
Previously developed?	No.
Adjacent land uses	Agriculture to W and E, B4220 to N, former railway line to S.
Ownership	Single.

Site features	
Boundaries	Hedgerow/boundary trees. Mature planting to S to former railway line.
Other site features /	Crossed by overhead power lines.
constraints	
Topography	Site falls to S/SW.

Accessibility / infrastructure	
Highway access	Frontage to B4220.
Public right of way?	None.
Other infrastructure /	No information.
services	

Former UDP, LPCS and planning history	
Former UDP	No specific proposals/proposals map notation.
LPCS	No policy map notation. The former railway line is a local strategic corridor in the Council's Green Infrastructure Strategy, extending south of the A44.
Planning history	None.

Heritage assets	
Conservation Area	None.
Listed buildings	None.
SAM	None.
Other heritage	None.

Environmental information	
Landscape type	Principal Settled Farmlands.
TPO	None.
Biodiversity sites and	Bromyard Downs Local Wildlife Site to N. The former railway line to S is a
habitats	priority habitat (deciduous woodland).
Flood risk	Flood Zone 1 (low probability).
Other	Abberley and Malvern Hills Geopark.

Site assessment	
Suitability	This site lies opposite a block of ex-Council housing to the south of Bromyard Downs in a rural setting. It is the closest of all the Call for Site submissions to the primary school. At its nearest point it is some 500m on foot across the Downs to the school, although this entails a crossing of the A44 as well as the B4220 and is an uphill route across broken terrain. The more realistic route for primary school children and their carers is by car (circa 1.1 km). It is 800m to local employment at Linton Trading Estate by road. The site is relatively low-lying in the surrounding landscape, and visual impacts could be mitigated by strategic landscaping to strengthen existing boundary treatments. Subject to consideration of an appropriate scale of development (see below), the site offers a suitable location for development bearing in mind the requirements of LPCS policy RA2, the strategic identification of Linton as a settlement to be a main focus of housing growth, and the existing dispersed pattern of both settlement and service provision in the Neighbourhood Area.
Availability	The Call for Site submission confirms the site is available within 5 years.
Achievability	There is no evidence of site factors which would adversely impact on delivery, such that there is a reasonable prospect that the site could be developed for housing within 5 years.
Development potential	The overall site extends to 3 ha., the development of which would be excessive in relation to the requirement to deliver proportionate and sustainable housing growth. The current field has been formed by amalgamating two smaller parcels. The historic field boundary between these two parcels is a basis for sub-dividing the site, to define an area for allocation in the north of the site (1.6 ha). This has potential for development for up to 20 dwellings, having regard to the low density of the development opposite, the rural setting and to enable provision of landscaping including on the south-eastern boundary.
Concluding assessment	Whilst this site overall is of excessive scale in relation to proportionate housing requirements, it does have potential for a partial release in the north, opposite existing housing. Historic field boundaries inform identification of an area for allocation for up to 20 dwellings. Eight of these should be provided as affordable units (a mix of intermediate housing, affordable rent and social rent). The area for allocation is both suitable and available for development, with a reasonable prospect that it will be developed for housing within 5 years. It has an optimal relationship to the existing housing opposite, is reasonable accessible to local employment and services, and does not compromise the continued agricultural use of the remainder of the overall site. The route of the former railway, an acknowledged green infrastructure asset, forms the southern boundary to the site; in the longer term, and in conjunction with other proposals, this offers potential for sustainable access to Bromyard.

Site Assessment: Site 13, Land at The Bannut

Site information	
Reference	Site 13
Name/address	Land at The Bannut, Bromyard Road, Bringsty WR6 5TA
Area (hectares)	1.1.
Existing use	Dwelling and garden/former plant nursery including outbuilding and polytunnels.
Previously developed?	No, save for land occupied by permanent structures (NPPF definition excludes residential gardens).
Adjacent land uses	A44 to N; former orchard to W; farmland and dwelling (School Cottage) to S; dwelling (Malvern View) to E.
Ownership	Single.

Site features	
Boundaries Trees/hedgerow.	
Other site features /	None.
constraints	
Topography	The site has levels below the A44 and falls to the S.

Accessibility / infrastructure	
Highway access Direct to A44 via shared private access.	
Public right of way?	None.
Other infrastructure /	Water and electricity on site. No mains gas or mains drainage.
services	

Former UDP, LPCS and planning history	
Former UDP	No specific proposals/proposals map notation.
LPCS	No notation.
Planning history	None.

Heritage assets	
Conservation Area	None.
Listed buildings	Clater Lodge, Malvern View and Old School House are grade II listed.
SAM	None.
Other heritage	Brockhampton Park to N of the A44 is a grade II registered historic park and garden. Clater Park to W (non-adjoining) is an unregistered park and garden.

Environmental information	
Landscape type	Timbered Plateau Farmlands.
TPO	None.
Biodiversity sites and	Local Wildlife Site to N of A44 at Brockhampton. Priority habitats (traditional
habitats	orchard) to the W, between site and Clater Lodge, and to the E.
Flood risk	Flood Zone 1 (low probability).
Other	Abberley and Malvern Hills Geopark.

Site assessme	nt
Suitability	This site comprises an existing residential curtilage on the western edge of Bringsty Common, part of a small cluster of dwellings which take access from the A44. There is significant tree and other landscaping to the site boundaries and internally. The plot is generously-proportioned, no doubt reflecting the former commercial nursery use of part of the site, and there is scope for further development to be in keeping with the dispersed and varied settlement character and pattern. There is access to local employment, services and facilities such as the Live and Let Live public house (1 km by footpath) and via the A44 to the primary school (1.45 km) and Linton Trading Estate (2.2 km).
	There are neighbouring designated heritage assets, the nearest of which are Malvern View Cottage and the Old School House which both lie to the east. However, the existing bungalow on the site lies between these properties and the undeveloped portion to the west. Clater Lodge is some 80m to the west with intervening open land. There is significant mature boundary screening. Further development can be accommodated on the site without any harm to, or loss of, the significance of the neighbouring designated heritage assets.
	Road traffic noise will need to be considered in scheme design and any NDP planning policy should require provision of a suitable Noise Assessment and mitigation as required.
Availability	The Call for Site submission confirms the site is available within 5 years.
Achievability	There is no evidence of site factors which would adversely impact on delivery, such that there is a reasonable prospect that the site will be developed for housing within 5 years.
Development potential	The existing bungalow and its immediate curtilage occupy some 0.2 ha., leaving 0.9 ha. for development. Assuming development at an equivalent density would allow a further five dwellings. This is a low capacity figure for a site of this size, but is justified having regard to the desire to respect settlement character and to avoid any harm/loss of significance of designated heritage assets.
Concluding assessment	The site is part of a cluster of dwellings on the western edge of Bringsty Common. It is both suitable and available for development, with a reasonable prospect that it will be developed for housing within 5 years. There is reasonable access to local employment and services. Provision of up to a further five dwellings will reflect the existing site character and ensure that the scheme is well-related to the dispersed settlement pattern.