



**Brockhampton Group
Neighbourhood Development Plan**

**Housing site assessment
Addendum**

DJN Planning Limited
December 2019
For Brockhampton Group Parish Council

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1. Introduction

- 1.1 This report is an Addendum to the Housing Site Assessment (HSA)¹ undertaken in 2019 for the Brockhampton Group Parish Council as part of the preparation of the Brockhampton Group Neighbourhood Development Plan (NDP).
- 1.2 The original HSA assessed a number of sites in the Neighbourhood Area in terms of their suitability for new housing development. Sites were identified through a public Call for Sites held in January/February 2019. A total of 13 sites were submitted for consideration. Nine sites were discounted on the basis of not having the sought-after relationship with the Local Plan Core Strategy (LPCS) settlements of Bringsty and Linton, even allowing for the dispersed character of these villages. The remaining four sites were assessed in more detail. Two were identified as suitable for development in whole or in part, and were recommended for consideration for allocation in the NDP:
- Site 9 (part), Land at Malvern Road (proposed 20 dwellings)
 - Site 13, Land at The Bannut (proposed 5 dwellings)
- 1.3 The HSA concluded that the proposed site allocations, in combination with a reasonable windfall allowance and taking into account dwellings already built or with planning permission as at April 2018, would deliver the housing growth target for the Neighbourhood Area required by the LPCS. The HSA also provided draft settlement boundaries for Bringsty and Linton, again to deliver on an LPCS requirement.
- 1.4 In October 2019, public consultation was held on a number of aspects of the NDP, including the two proposed housing site allocations and the draft settlement boundaries. A report on the event has been prepared.² Three new potential housing sites, not previously assessed, were notified to the Parish Council as part of the consultation feedback.
- 1.5 The purpose of this Addendum is to:
1. assess the new sites using the same methodology as in the HSA (Section 2)
 2. summarise other feedback from the consultation, including on the proposed allocation of sites 9 (part) and 13, and give an update on housing delivery as at April 2019 (section 3); and
 3. provide revised recommendations, taking all the above into account (section 4).
- 1.6 The Addendum is designed to be read alongside the original report and so does not repeat calculations of housing requirements or methodology.

¹ Housing Site Assessment, June 2019

² Community Engagement Event 3 October 2019, Feedback Report, October 2019.

2. Site assessments

2.1 The three sites put forward through the October 2019 consultation are:

- Site 14, Land west of Hopcote Cottage
- Site 15, Land south of Clater Lodge
- Site 16, Land at The Live and Let Live public house.

2.2 The sites are shown on Plans 1 and 2. These plans also show the proposed housing site allocations at sites 9 (part) and 13, together with the draft settlement boundaries for Linton and Bringsty respectively, as these were set out in the HSA.

Summary of site assessments

Site 14, land west of Hopcote Cottage

2.3 Site 14 offers a relatively sustainable opportunity for development, with a good relationship to existing settlement areas at Linton and reasonable access by a choice of modes of transport to local services and facilities, including at Bromyard. Sustainable access to Bromyard may also be available in the longer term via the route of the former railway line. The optimum area for development is in the east of the site with potential capacity for up to 10 dwellings. Further information is needed to confirm that vehicular access to serve such new development is achievable from the A44 in accord with relevant standards. The site is otherwise suitable and available for development.

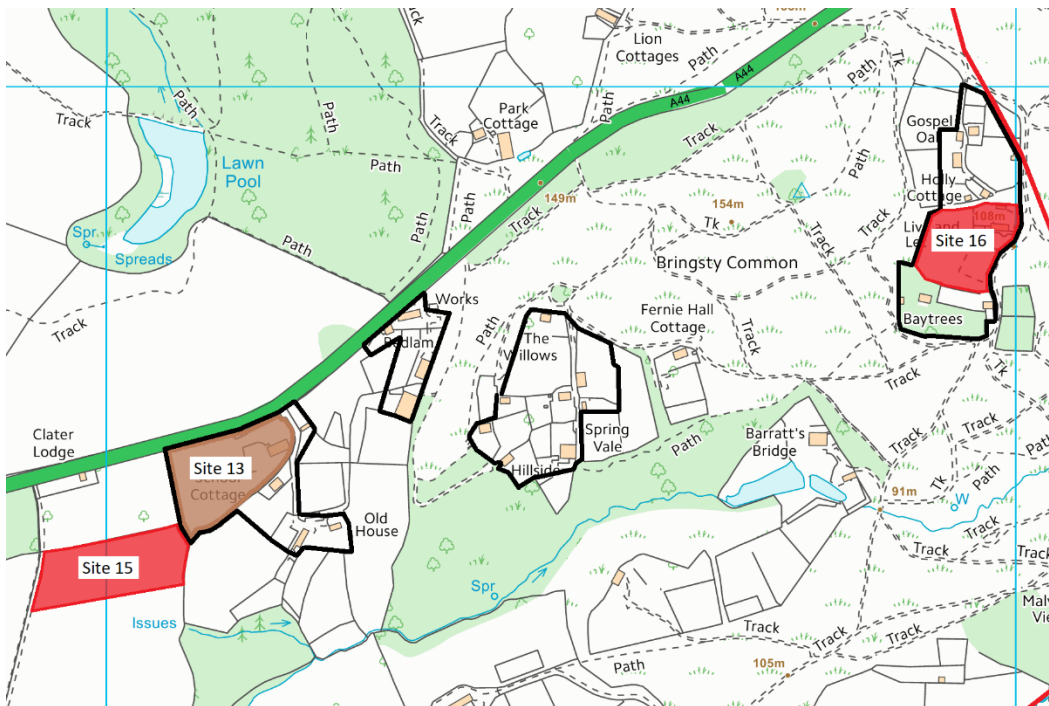
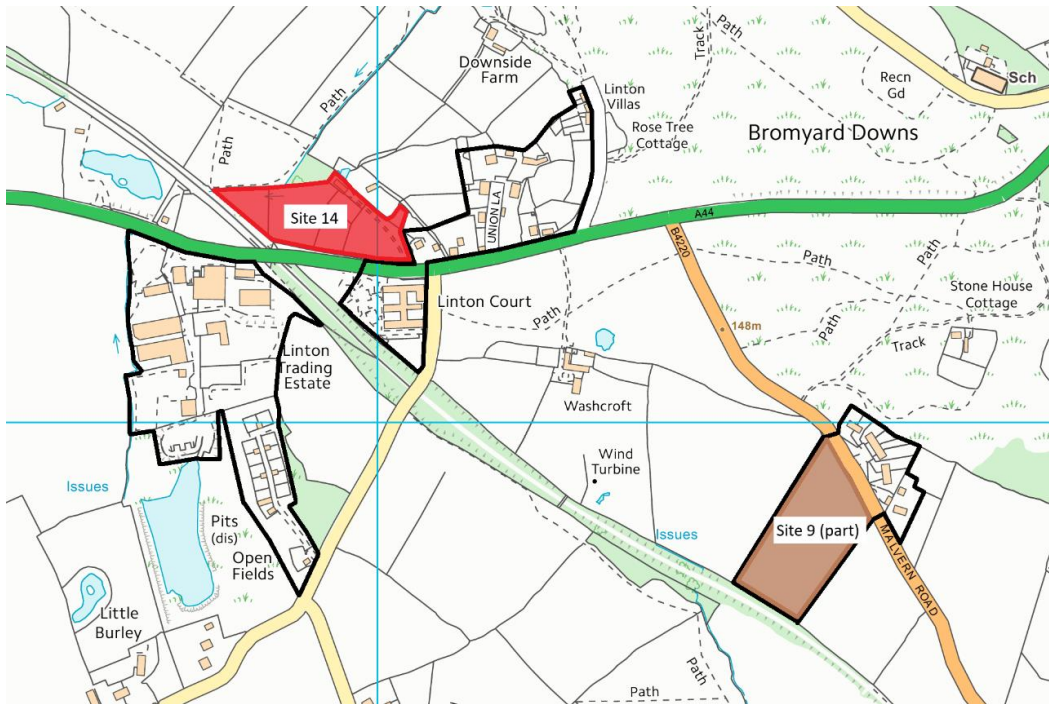
Site 15, land south of Clater Lodge

2.4 This site is unsuitable for allocation because of its lack of relationship to Bringsty, even allowing for the dispersed character of that settlement, and the potential for landscape impacts. It is in a relatively isolated countryside setting, such that its allocation for housing would not accord with strategic policy to avoid unnecessary isolated and non-characteristic development away from the identified settlements. The rolling topography, elevation and orientation of the site means it is open to long-distance views from the S and W; development in this exposed situation would likely harm landscape character. It is recommended this site is not considered further in the NDP.

Site 16, land at The Live and Let Live public house


2.5 This site has a good relationship to existing settlement areas at Bringsty. Whilst there is limited access to services, Bringsty is a main focus settlement in the LPCS. However, its potential for allocation is limited by several unresolved factors. These are: whether an access to serve new development via the existing Byway Open to All Traffic will be acceptable; whether harm to or loss of significance of the grade II listed public house can be avoided or otherwise justified; and whether a viable scheme can be developed which respects the prevailing landscape character. Given these issues, the recommended approach is to continue

to include the site inside one of the proposed settlement boundaries for Bringsty, but not to allocate it for development. This will enable a suitable scheme to come forward in due course, when it will contribute towards meeting the overall windfall allowance for the NDP.



Plans 1 and 2: Housing sites at Linton (top) and Bringsty (bottom)

-  Draft settlement boundary
-  Neighbourhood area
-  Proposed housing site
-  New sites for assessment

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3. Other post-HSA updates

Summary of feedback on housing sites from Community Engagement Event

Site 9 (part), land at Malvern Road (proposed 20 dwellings)

- 3.1 A majority of those responding (56%) did not agree with the proposed allocation, with 37% in agreement.
- 3.2 Key issues raised in comments:
- Too large a development which would be disproportionate to the size of the current community of 10 dwellings
 - Does not reflect the preference expressed in the household survey for new dwellings to be provided on smaller sites rather than via larger schemes (of more than 10 new homes)
 - Lack of adequate infrastructure particularly with regard to land drainage and flood risk
 - Dangerous vehicular access onto B4220
 - Visual and landscape impact, noise and light pollution arising from development in an open countryside setting
 - Unsuitable location for affordable housing given the lack of access other than by private car to services.

Site 13, Land at The Bannut (proposed five dwellings)

- 3.3 A majority of those responding (56%) agreed with the proposed allocation, with 19% not in agreement.
- 3.4 Key issues raised in comments:
- Dangerous vehicular access onto A44
 - Assurance sought on number of houses to be provided
 - Impact on adjacent listed buildings.

Housing delivery at April 2019

- 3.5 Herefordshire Council records show the following position for 1 April 2019 for new dwellings since 2011:

Completions - built 2011-2019: 5 dwellings

Commitments – extant planning permissions for new residential units: 1 dwelling.

- 3.6 The overall position remains as reported in the HSA. There is a requirement for the NDP to demonstrate delivery of a minimum of 24 new dwellings in the period to 2031, to meet the LPCS target of 30 new dwellings 2011-2031.

4. Conclusions and recommendations

4.1 This concluding section addresses each of the sites under consideration, beginning with the two sites on which opinion was canvassed at the October Community Engagement Event.

4.2 The feedback from this event was considered by the Parish Council at its meeting on 20 November 2019. The draft minute states that:

Councillors felt that, in particular, the Malvern Road site should be reduced in size to be more in keeping with adjacent developments, and that additional sites should be considered, where possible, with a view to dispersing future development across the area. It was felt that the NDP should not allocate more housing than is required by Herefordshire Council's Core Strategy, including taking into account any potential 'windfall' gains.

4.3 In respect of **site 9 (part), land at Malvern Road** a majority of respondents (56%) were opposed to this draft proposal and the consultation has raised a number of issues. In part and as suggested above these could be addressed by reducing the size of the allocation. An allocation for 10 dwellings (rather than the 20 consulted upon) would be in scale with the adjacent development. There are no existing or historic site boundaries which could be used to define an appropriate site, which would be circa. 0.4 ha., so a new boundary to farmland to the south west would need to be created. A smaller scheme would reduce the potential for visual and landscape impact and noise/light pollution.

4.4 Concerns were raised in consultation responses re drainage and vehicular access. The site is reported to be subject to drainage flows from the existing development to the NE at times of heavy rainfall. Any allocation in the NDP should include a requirement for a Flood Risk Assessment to be prepared to demonstrate flood risk can be appropriately managed. Advice should be sought from the highway authority as to the acceptability of a new vehicular access to the B4220.

4.5 The consultation response for **site 13 The Bannut** was more favourable in that a majority of those responding were in favour of the allocation proceeding (56%). A concern was raised in respect of access to the A44; as above, this should be further investigated with the highway authority. Any NDP policy would indicate the number of dwellings to be provided but it is not possible under LPCS policy to establish a cap on numbers. No harm to or loss of significance is anticipated in respect of designated heritage assets.

4.6 The general point was made in the consultation responses and at the November Parish Council meeting that additional sites should be considered where possible in meeting the minimum housing requirement, which should be inclusive of windfall gains. Net of dwellings built or with planning permission at April 2019, the residual figure is 24 dwellings.

4.7 Taking windfalls first, a reasonable windfall allowance was assessed in the HSA as six dwellings and there is no recent evidence to justify this being increased. No new windfall units have come forward in the year 2018/19. Net of windfalls the residual figure is 18 dwellings.

4.8 Additional sites may only be considered where these have been identified to the Parish Council as being available for development. In this respect, the Community Engagement Event led to three additional sites coming forward, which have been assessed in this report. It is recommended that:

- **Site 14, land west of Hopcote Cottage** should be considered for allocation for up to 10 dwellings, subject to confirmation that an acceptable vehicular access to the A44 can be achieved;
- **Site 15, land south of Clater Lodge** is not considered further in the NDP, for the reasons given; and
- **Site 16, land at The Live and Let Live public House** not be specifically allocated but continue to be included in one of the proposed settlement boundaries for Bringsty. Should a scheme be granted planning permission, the dwellings concerned will then contribute to meeting the NDP's windfall allowance.

4.9 In term of meeting the residual housing requirement, the sites and their potential capacities are:

Site ref	Name	Potential capacity
Site 9 (part)	Land at Malvern Road (part), Linton	10
Site 13	Land at The Bannut, Bringsty	5
Site 14	Land west of Hopcote Cottage, Linton	10

4.10 As a next step, it is recommended that contact is made with HC's Neighbourhood Planning team, to ascertain whether the highway authority could provide an 'in principle' view as to the acceptability of vehicular access to the three sites for the dwelling numbers indicated.

APPENDIX 1: Site assessments

Site Assessment Forms for:

Site ref	Name
Site 14	Land west of Hopcote Cottage
Site 15	Land south of Clater Lodge
Site 16	Land at The Live and Let Live public house

Site Assessment: Site 14, Land west of Hopcote Cottage

Site information	
Reference	Site 14.
Name/address	Land west of Hopcote Cottage.
Area (hectares)	1.41.
Existing use	Agricultural (pasture).
Previously developed?	No.
Adjacent land uses	A44 to S, former railway line to W, agricultural land to N, dwellings to E.
Ownership	Single.

Site features	
Boundaries	Hedgerow/trees. Watercourse runs along N boundary, draining E.
Other site features / constraints	Site divided into four paddocks. Track across site from A44 gives access to stable block and barn in N. Power lines on E boundary.
Topography	Site levels are generally below the A44, particularly towards the E/former railway line.

Accessibility / infrastructure	
Highway access	Direct to A44 via field gate in SE corner.
Public right of way?	None.
Other infrastructure / services	Water and electricity to stables. Gas, mains drainage and telecoms available at the A44.

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 Herefordshire Council's Green Infrastructure Strategy, extending south of the A44.
Planning history	None on site. The development of five dwellings on land to the S, on the other side of the A44, was dismissed on appeal in May 2015 due to proximity to sources of noise from the Trading Estate and the A44.

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. Priority Habitat Inventory site (Lowland Meadows) adjoining to NW.
Flood risk	Flood Zone 1 (low probability).
Other	None.

Site assessment	
Suitability	<p>The site is well-related to existing development, with housing adjoining immediately to the east and opposite at Linton Court. This favours development of the site for housing, rather than employment. It is 1 km to the primary school, and employment at Linton Trading Estate is available nearby. There is pedestrian access into Bromyard via the footpath alongside the A44 (1.4 km), and there are bus stops adjacent. It is a discrete site which is reasonably well contained in the landscape, sitting generally below the main road and with mature trees along the N boundary.</p> <p>The potential for noise impacts from both Linton Trading Estate and the A44 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.</p> <p>Further advice is needed on the feasibility of achieving vehicular access to the A44, which is subject to 50 mph speed limit along the site frontage. Proposals to make use of the existing field access will need to take account of the proximity of the A44/Burley Lane junction opposite and the adjacent bus stop layby, and achieving any required improvement to the visibility splay looking E may be compromised by third party land. The other option could be a new access to the A44 at a point midway between the existing field access and the railway bridge (feasibility and acceptability to be investigated, including to take account of the level difference between A44 and the site). Provided access can be resolved, the site offers a suitable location for development bearing in mind the requirements of LPCS policy RA2 and the identification of Linton as a settlement to be a main focus of housing growth.</p>
Availability	The submission by the landowner confirms the site is available in whole or in part for housing and/or employment within 0-5 years.
Achievability	Whilst the feasibility of providing vehicular access to the A44 needs to be further investigated, there is no evidence of other site factors which would adversely impact on delivery. Subject to access being resolved, there is a reasonable prospect that the site or part thereof could be developed in the stated timeframe.
Development potential	The relationship to existing dwellings and site levels suggest that the optimum area for development lies in the east of the site. This will also maintain a separation between any new dwellings and Linton Trading Estate, helping with any noise/disturbance issues. If the area for development was to be taken as the easternmost two paddocks (A and B on the submitted plan), the resultant site is 0.7 ha. Landscaping should be established on the western edge (though this could be provided on the adjoining paddock C). The standard density of 25 dph would suggest a capacity of 17 dwellings, but established densities in the immediate locality, for instance off Union Lane, are much less than this. A capacity of up to 10 dwellings should be allowed for at this stage to help ensure that new development is more in keeping with the existing dispersed settlement character.
Concluding assessment	This site offers a relatively sustainable opportunity for development, with a good relationship to existing settlement areas at Linton and reasonable access by a choice of modes of transport to local services and facilities, including at Bromyard. Sustainable access to Bromyard may also be available in the longer term via the route of the former railway line. The optimum area for development is in the east of the site with potential capacity for up to 10 dwellings. Further information is needed to confirm that vehicular access to serve such new development is achievable from the A44 in accord with relevant standards. The site is otherwise suitable and available for development.

Site Assessment: Site 15, Land south of Clater Lodge

Site information	
Reference	Site 15.
Name/address	Land south of Clater Lodge.
Area (hectares)	1.0.
Existing use	Agricultural (arable).
Previously developed?	No.
Adjacent land uses	Grounds of Clater Lodge to N, agricultural to E, S and W.
Ownership	Assumed single.

Site features	
Boundaries	Hedgerow/trees on N and E boundaries. Farm access track to W. The S boundary to the site as submitted is unmarked on the ground.
Other site features / constraints	Overhead power lines run E-W across the site.
Topography	Site falls to E, with long distance views to Malvern Hills from the public footpath along the W boundary.

Accessibility / infrastructure	
Highway access	Farm track from A44 (75m at closest point) runs on site's W boundary.
Public right of way?	Public footpath alongside W boundary.
Other infrastructure / services	No information on availability of services.

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	Clater Lodge to N and Old School House to E are grade II listed.
SAM	None.
Other heritage	Clater Park adjoining to W is an unregistered park and garden. Brockhampton Park to N of the A44 is a grade II registered historic park and garden.

Environmental information	
Landscape type	Principal Settled Farmlands.
TPO	None.
Biodiversity sites and habitats	None on site. Priority Habitat Inventory sites adjoining to N (Traditional Orchard) and W (Wood-pasture and Parkland). Non-adjoining: Brutons Coppice to SE is Ancient Replanted Woodland, Large Ash Bed to NE is Ancient and Semi-natural Woodland.
Flood risk	Flood Zone 1 (low probability).
Other	None.

Site assessment	
Suitability	This site lies to the west of Bringsty in an elevated and open countryside setting, well back from the main road and away from other settlement areas. The grade II listed Clater Lodge is 70m to the N beyond significant mature boundary screening and intervening open land. It has a short (20m) boundary to the NE with land at The Bannut. This latter site is currently being considered for allocation for housing in the NDP, reflecting its position amongst a cluster of dwellings on the western edge of Bringsty Common. However, site 15 extends westwards from this point on rising ground and is linear in form. Development on the site would extend into open countryside and would be poorly related to Bringsty and to existing services and facilities. Development would also likely harm landscape character because of its exposed situation and topography. The allocation of this relatively isolated site would not accord with strategic policy to focus new dwellings in or adjacent to Bringsty.
Availability	No information as to timescale.
Achievability	There is no evidence of site factors which would adversely impact on delivery. The site submission indicates that the overhead power lines could be run underground (following discussion with Western Power Distribution).
Development potential	The site submission indicates an intention to develop 5 no. executive houses.
Concluding assessment	This site is unsuitable for allocation because of its lack of relationship to Bringsty, even allowing for the dispersed character of that settlement, and the potential for landscape impacts. It is in a relatively isolated countryside setting, such that its allocation for housing would not accord with strategic policy to avoid unnecessary isolated and non-characteristic development away from the identified settlements. The rolling topography, elevation and orientation of the site means it is open to long-distance views from the S and W; development in this exposed situation would likely harm landscape character. It is recommended this site is not considered further in the NDP.

Site Assessment: Site 16, Land at The Live and Let Live public house

Site information	
Reference	Site 16.
Name/address	Land at The Live and Let Live public house.
Area (hectares)	0.8.
Existing use	Public house and outbuildings, car park, open storage.
Previously developed?	Yes.
Adjacent land uses	Dwellings to N and S, otherwise common land.
Ownership	Assumed single.

Site features	
Boundaries	Mature hedgerow, trees.
Other site features / constraints	None recorded.
Topography	Site falls to the S and E; the south-eastern portion of the site (car park) is level.

Accessibility / infrastructure	
Highway access	Access track from A44 to the public house is a Byways Open to All Traffic (BOAT).
Public right of way?	
Other infrastructure / services	No information on availability of services.

Former UDP, LPCS and planning history	
Former UDP	No specific proposals/proposals map notation.
LPCS	No policy map notation.
Planning history	Several applications/permissions relating to the public house use, most recently for retention of a static caravan. No other relevant planning history.

Heritage assets	
Conservation Area	None.
Listed buildings	The public house is listed grade II.
SAM	None.
Other heritage	None.

Environmental information	
Landscape type	Unenclosed Commons.
TPO	None.
Biodiversity sites and habitats	Priority Habitat Inventory: Traditional orchard on 0.59 ha. of the site, excluding only the public house and immediate environs. Outside site, good quality semi-improved grassland to E, W and N; traditional orchard to N and S. National Forest Inventory: broadleaved woodland to S. Local Wildlife Site: the site is set within (but excluded from) the Bringsty Common Local Wildlife Site.
Flood risk	Flood Zone 1 (low probability).
Other	None.

Site assessment	
Suitability	<p>Site 16 is part of a small and dispersed group of dwellings on Bringsty Common. The site itself is not common land. Access is from the A44 by a BOAT across common land. The use of this route to serve any new development on the site will need to be further discussed with Herefordshire Council (as highway authority and landowner) and the Manorial Court.</p> <p>Part of the site is occupied by a listed building and the remaining land is within the setting of this designated heritage asset, with considerable intervisibility. Any harm to or loss of the significance of a designated heritage asset requires clear and convincing justification (NPPF para. 193). New development in the setting may both adversely impact on significance (e.g. by detracting from the present relatively isolated position of the public house) or enhance it (e.g. by making use of the open storage areas). Much will depend on the detail, in the absence of which the degree of any harm or loss and any possible justification cannot be determined.</p> <p>The majority of the site is a Traditional Orchard Priority Habitat, although some is now used either as car park or open storage. If development is to proceed, an ecological survey should be considered to see whether any of this remaining habitat could be secured through development elsewhere on the site.</p> <p>The character of the Unenclosed Commons landscape type is typified by an open landscape, a lack of enclosure and a sense of wilderness. Settlement is usually restricted to wayside dwellings in the form of small cottages. The scale and dispersed pattern of such settlement is evident at Bringsty Common and would need to be respected by any new development, reducing capacity accordingly and needing close attention to overall design.</p> <p>Development on the site would not be likely to adversely impact on the recreational use of the common. A further factor is the positive contribution that development could make to ensuring the continued viability of a rural business, provided car park capacity was preserved.</p>
Availability	No information as to timescale.
Achievability	Apart from those considered above, there is no evidence of other site factors which would adversely impact on delivery.
Development potential	The heritage and landscape factors identified will reduce development potential and pending further work on scheme design it would be prudent to assume a potential of no more than 2-3 dwellings.
Concluding assessment	This site has a good relationship to existing settlement areas at Bringsty. Whilst there is limited access to services, Bringsty is a main focus settlement in the LPCS. However, its potential for allocation is limited by several unresolved factors. These are: whether an access to serve new development via the existing BOAT will be acceptable; whether harm to or loss of significance of the grade II listed public house can be avoided or otherwise justified; and whether a viable scheme can be developed which respects the prevailing landscape character. Given these issues, the recommended approach is to continue to include the site inside one of the proposed settlement boundaries for Bringsty, but not to allocate it for development. This will enable a suitable scheme to come forward in due course, when it will contribute towards meeting the overall windfall allowance for the NDP.