

Border Group of Parishes Neighbourhood Development Plan

Meeting Housing Need 2011-2031

June 2016



On behalf of Border Neighbourhood Plan Steering Group

Data Orchard, Church House, Allensmore, Hereford HR2 9AG
Company no. 8674626

Border Group of Parishes Neighbourhood Development Plan - Housing Land Assessment 2011-2031

Purpose of this Report –

To indicate to Herefordshire Council that Border Group Neighbourhood Development Plan is able to deliver the required number of houses to deliver the proportional growth required to meet Policy RA2 of Herefordshire Local Plan Core Strategy.

1. Introduction

- 1.1 This report has been prepared in response to concerns expressed by Herefordshire Council about the ability of the Regulation 14 Draft Border Group Neighbourhood Development Plan (BGNDP) being able to achieve the required housing target set for the group parish. It seeks to identify how BGNDP can meet the housing target set for the Group Parish over the period 2011 to 2031. The basis for the target is Herefordshire Local Plan Core Strategy (hereafter referred to as Herefordshire Core Strategy) Policy RA1 which is to be implemented partly through its Policy RA2, which indicates how much each neighbourhood plan area should address meeting its housing target. Border Group Parish falls within the Leominster Housing Market Area where the indicative housing target is a growth in the number of houses within those of its constituent parishes that have settlements listed in Herefordshire Core Strategy Table 4.14 and 4.15 of 14% upon its 2011 number of dwellings.
- 1.2 It should be recognised at the outset that BGNDP will contain only some of the policies that will seek to make a contribution to the indicative housing target set for the Group Parish, Herefordshire Core Strategy sets out a number of other policies that will also make a contribution to meeting housing needs, in particular policy RA3.
- 1.3 Herefordshire Core Strategy Policy RA2 (Appendix 1) indicates how that part of the housing requirement to be located within named settlements is to be planned for. Herefordshire Council is promoting Neighbourhood Development Plans as its preferred approach for planning to accommodate development within or adjacent to named settlements. Should a Neighbourhood Development Plan not be produced, planning for housing will need to be met through Herefordshire Council producing its Rural Areas Plan or, more likely, through developers bringing forward proposals for sites with little or no input from the community and that may well provide in excess of the number of houses provided through this plan. Within Border Group Parish the settlements of Adforton, Brampton Bryan and Lingen are listed in Table 4.14 and Walford in table 4.15. Each falls within a different parish. The Group of Parishes also includes the parish of Willey and the parish of Buckton and Coxall. Neither of these had settlements listed in Herefordshire Core Strategy and hence proposals for all new housing would be determined against Policy RA3 and no housing targets are set for them.

- 1.4 Originally work commenced on the basis of the Submission Draft Herefordshire Core Strategy which set targets of 7 new dwellings in Adforton, Brampton Bryan and Lingen for the period 2011 to 2031. Achieving these targets could however take into account commitments already provided through completions and outstanding planning permissions granted since April 2011. No target was set for Walford as development within it was restricted to providing for an unspecified amount of local housing need.
- 1.5 Herefordshire Core Strategy Policies RA1 and RA2 were subsequently modified. The housing target set for the Group Parish should be met within the four parishes where there are listed settlements according to a locally determined approach. In addition the approach to planning for settlements is defined. This indicates (para 4.8.23):
- ‘Where appropriate, settlement boundaries (or a reasonable alternative) for those settlements listed in Policy RA2 will be defined in either neighbourhood development plans or the Rural Areas Sites Allocation DPD.’*
- 1.6 The target level of housing required by Herefordshire Core Strategy forms the starting point for this assessment. In relation to Border Group of Parishes the target indicated by Herefordshire Council is 36. The intention should be to plan positively for development and not to restrict unnecessarily the provision of housing. This does not mean a ‘free-for-all’ but to balance provision with other social, economic and environmental objectives.
- 1.7 BGNDP Steering Group needed to identify what level of development should be accommodated within its named settlements, bearing in mind development outside of these settlements; environmental and other constraints; the amount of additional housing needed to achieve its objectives; and the views of residents expressed in a number of consultations undertaken as part of the plan preparation. In addition it has been conscious of the need to plan positively in advice issued by Herefordshire Council who emphasise that the housing target is a minimum.
- 1.8 Neighbourhood Development Plans are to identify housing provision within or adjacent to one or more of its named settlements. Herefordshire Core Strategy Para 4.8.16 indicates that housing development should ensure that unnecessary isolated, non-characteristic and discordant dwellings do not arise which would adversely affect the character and setting of a settlement and its local environment.

2. Assessing the Level of Need

- 2.1 Making provision to meet the new housing target within the Parish over the 20 year period 2011 to 2031 involved assessing how many houses should be accommodated within or adjacent to one or more of the named settlements in the Group Parish together with how many might come forward as dwellings in the countryside, namely those needed for farming and forestry, rural enterprises, the re-use of redundant or disused rural buildings, as rural

exception sites for affordable housing, or as dwellings of exceptional or innovative design. Provision for these dwellings in the countryside is covered generally by Herefordshire Core Strategy Policy RA3.

- 2.2 Given that the plan period started in 2011, account can also be taken of new dwellings built and planning permissions for new houses that have already been granted since that date.
- 2.3 Consequently, the calculation of the minimum housing target that BGNPD should make provision for within or adjacent to one or more of its named settlements should be based upon the target level required within the Parish as a whole (i.e. 36) less the following:
 - i) The number of dwellings built since April 2011;
 - ii) The number of dwellings resulting from as yet unimplemented but outstanding planning permissions;
 - iii) An assessment of the number of dwellings likely to arise as a consequence of planning permissions granted under Herefordshire Core Strategy Policy RA3 between now and April 2031 (hereafter termed 'rural windfalls').
- 2.4 The residue will then suggest the minimum level required to be provided through sites within or adjacent to the named settlements.
- 2.5 Herefordshire Council has advised that no houses were completed over the period 2011 – 2014, while over the same period 3 dwellings received planning permission but had not been completed. A further two dwellings have received approval since 2014.
- 2.6 No Strategic Housing Land Availability Assessment (SHLAA 2015) has been carried out by Herefordshire Council for Adforton and Walford. The Assessment for Brampton Bryan identified no sites of High or medium suitability. Two sites, comprising rural building conversions were identified as of low suitability. All sites considered for Lingen were considered to have no suitability during the plan period.

3. Windfall Provision

- 3.1 Herefordshire Council has not assessed the potential levels of windfall developments within individual Housing Market Areas but suggests a modest level of provision across the County's rural area as a whole:

“4.8.10 Past rates of housing completions in the rural areas suggest that this level of growth (i.e. 5,300 dwellings) is appropriate and achievable. Historically it is evident that much rural housing has come forward on small sites, often for individual dwellings, being allowed through the application of planning policy rather than the allocation of housing sites. Additionally, significant numbers of new housing continues to be delivered through the conversion of rural buildings, many being redundant agricultural buildings on farmsteads. Paragraph 48 of NPPF indicates that an allowance may be made for windfall if

there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source. There is clear evidence over many years that such sites have delivered an important element of the county's housing supply and as such a modest windfall allowance for rural areas has been included of 1000 dwellings (50 per annum)."

- 3.2 It is understood that the modest windfall allowance of 1,000 dwellings represents a significant reduction upon the past rate although it reflects the level of housing development that would be expected to result from planning permissions granted through Herefordshire Core Strategy Policy RA3. In this regard it would not include small and/or medium sized sites within settlement boundaries.
- 3.3 The 1,000 houses amount to some 19% of the rural housing target of 5,300.
- 3.4 Future trends in terms of rural windfall dwellings may be influenced predominantly through rural building conversions. Overall their number may be reducing although this is countered by the change in Government policy that would make it easier to achieve planning permission for conversion to dwellings rather than to business use. Inspection of planning applications within the Group parish since 2001 indicates three applications for the conversion of rural buildings to dwellings were refused on the then policy grounds. Of the current outstanding commitments it is understood four dwellings fall outside of the named settlements. Based on this analysis a modest estimate might usefully be based upon the Council's figure of 19%, which in relation to the four larger parishes within Border Group Parish would amount to 7 dwellings over the period 2011 to 2031.

4. Development within Settlements

- 4.1 The populations of the four parishes within the Group that have settlements are roughly similar although Walford village is smaller than its counterparts in Adforton, Brampton Bryan and Lingen. All four villages are however small in the context of Herefordshire and their development in the past has been restricted by various constraints. These constraints are relevant in terms of their ability to accommodate growth.

Adforton

- 4.2 Adforton is a village comprising around 32 dwellings. The A4110 passes through the centre of the village rising up both from the north and the south as it approaches but dropping down slightly from both directions as it winds through the village. Many properties, particularly on the eastern side front directly onto the road and therefore have vehicular accesses directly onto it. The horizontal and vertical alignments of this road coupled with areas of limited visibility for vehicle passing through the village is a major constraining factor. The junction of Letton Lane with the A4110 is considered a danger point by local residents. Letton Lane itself rises sharply from the junction and

is rural in nature with a reducing width and high hedges as it starts to leave the village.

- 4.3 The land above the village to the west is the densely wooded Wigmore Rolls, a major landscape feature. Although predominantly conifer forest it is replanted ancient woodland designated as a Local Wildlife Site and shown as a substantial 'Core Area' upon Herefordshire Council's Ecological network Map. Hence its importance is heightened as both a landscape and biodiversity feature.
- 4.4 As required by Herefordshire Core Strategy, a settlement boundary is defined for Adforton based upon an approach to accommodating new housing development governed principally by concerns to maintain highway safety. Within this context the plan:
- i) Minimises or preferably avoids new vehicular accesses directly onto the A4110; and
 - ii) Enables a small amount of development on the western side of the village which would limit the extent of additional traffic movements at the junction of Letton Lane with the A4110.
- 4.5 In addition the plan seeks to minimise the environmental impact of development in the direction of Wigmore Rolls to avoid its encroachment into an environmentally important landscape feature and ecological corridor.
- 4.6 These factors are considered essential to achieve sustainable development.

Brampton Bryan

- 4.7 Brampton Bryan is a small estate village close to the border with Wales. With very few exceptions properties within the village are owned by the local estate. Similarly with very few exceptions land outside of the village is within that same ownership with in particular that surrounding the village all being part of the estate.
- 4.8 The village is particularly attractive and it is understood the former Leominster District Council considered its designation as a conservation area but were dissuaded by the fact that no new development pressures were contemplated either by planning policy or the landowner. Its character and appearance together with its relationship to the remains of Brampton Bryan Castle (Scheduled Ancient Monument) and the distinctive wall and hedge that runs almost entirely through the village on its north side are such that they should be preserved and a visual appraisal suggests there is little if any need for enhancement. To the south just away from the village sits Brampton Bryan Park, a Registered Historic Park and Garden.
- 4.9 The local estate has indicated it does not wish to make land available for a housing allocation within Brampton Bryan nor see a settlement boundary defined. It does however consider that the conversion of a number of barns to dwellings, particularly the large range at the western end of the village assessed within the SHLAA 2015 which may accommodate 8/9 units. One

potential infill site on the southern approach road to the village has also been identified although is unlikely to be released for development.

Lingen

- 4.10 Lingen is the most remote of the Group Parish's villages. Only minor roads provide access to the village and these are particularly narrow. Much of the village is designated a conservation area characterised by small scale development which does not extend in depth away from the road frontage. It contains no modern suburban housing estate. A Scheduled Ancient Monument is located at its northern end. Its eastern edge comprises land at risk of flooding.
- 4.11 To the south of the village land is shown as a Special Wildlife Site. The brook flowing through the village is similarly designated and this flows into the River Lugg which is an SSSI and later a Special Area of Conservation. There is no public sewer or sewage treatment works and consequently there remains concern that a precautionary approach should be taken to the level of any development in the village in order to protect the water environment and contribute towards the River Wye Nutrient Management Plan.
- 4.12 The village is considered the least sustainable location for further housing of any settlement in north-west Herefordshire for the above reasons although would support some limited development that serves local needs, retains or enhances the conservation area and makes a contribution to the wider needs of the Group Parish.

Walford

- 4.13 Walford is the smallest of the Group Parish's settlements identified as a location for new housing. It sits on the A4113 some two miles to the east of Brampton Bryan. Its principal constraint is that much of the village falls within Flood Risk Zone 3 with areas also in Zone 2. However works have been undertaken to local weirs and which may affect the location of the flood zones.
- 4.14 There are areas around the settlement where landowners have indicated they would make this available for development. Some fall within the areas at risk of flooding while others do not. They are generally small parcels most of which are below the size threshold for allocations. In addition there is a significant redundant barn complex that might be converted. However this falls within the area at risk of flooding.

5. Meeting the Housing Target

- 5.1 Utilising the modest rural windfall rate of 7 dwellings of which 4 have already come forward) and the single approval at Lingen since 2014 then target to be met within the four village and through the Neighbourhood Plan is 28 dwellings.

5.2 Table 1 below includes sites which have been identified as available for development within the settlement boundaries defined in the Neighbourhood Plan. This includes both sites and building conversions associated with settlements identified by landowners who have indicated through discussions that they would be willing to release them for housing development during the plan period. The estimated number of dwellings is generally at the low end for the purposes of determining compliance with the housing target. It does not signify any restriction and the eventual number may be higher.

Table 1: Sites Available and Considered Achievable

<i>Location</i>	<i>Area of Group Parish</i>	<i>Number of dwellings</i>
A1. Land on north side of Letton Lane currently occupied by agricultural buildings	Adforton	5
A2. (A6) Land at south end of village off of A4110	Adforton	2
A3. (A7) Redundant building and associated land	Adforton	2
B1. Redundant barns at west end of village	Brampton Bryan	8
L1. Land at north end of village adjacent to Yew Tree Cottage	Lingen	1
L2. Land at north end of village to south of Yew Tree Cottage	Lingen	1
L3. Land and redundant building at The Turn Farm	Lingen	2
L4. Land north of the of The Old Farmhouse	Lingen	1
L5. The Old Nursery Site	Lingen	5
L7. Land at south end of village on west side	Lingen	1
W1. Land at south of village on east side of Lingen Road	Walford	2
W2. Land on west side of Lingen Road	Walford	6
TOTAL		36

5.3 What the rural windfall allowance of 7 dwellings for the Group Parish might comprise has been assessed. Table 2 below shows how the Core Strategy trend may be expected to materialise with emphasis upon provision through rural building conversions, much of which has already been achieved and should therefore be considered a minimum. This suggested assessment is useful for the purposes of monitoring the level of rural development within the parish and might inform any subsequent review of the plan. The expected level of rural building conversions is expected to be much higher given the extent of rural buildings as suggested by information on farmsteads within the Group Parish contained within Herefordshire's Historic Environmental Record. In addition, one specific rural building is identified in the Neighbourhood Plan close to the entrance of Adforton village along Letton Lane that might be converted with some extension.

Table 2: Analysis of Potential Rural Windfalls

<i>Description</i>	<i>Future trends in parish</i>	<i>Number of dwellings</i>
Estimated level of rural building conversions.	Greater flexibility for this suggests the suggested total is highly likely to be exceeded during the plan period. Note identified Farmsteads (see list below). (4 have already received planning permission/PA not required since 2011)	5
Agricultural/Forestry dwellings	Small numbers of such dwellings have historically been approved. Agricultural trends are difficult to assess. Although moves tend to be towards large operations, more specialist and smaller agricultural enterprises cannot be discounted.	1
Necessary for a rural enterprise	No previous trend. There are a number of small local businesses present within the group parish so it remains a possibility.	1
Rural exception scheme	An unknown factor is what the approach to self-build housing to meet affordable/local need will be. The use of Policy H2 is expected to be the approach most appropriate to the Group Parish's settlement pattern.	(Taken as one category for the purposes of the assessment)
Dwellings of exceptional quality and innovative design.	By their nature these tend to be small one-off proposals. Unable to assess future trends at this level	
Total		7

Farmsteads listed within Herefordshire Environmental Record and potentially covered by Herefordshire Historic Farmstead Characterisation Project.

(NB some farmsteads contain associated barns which have already been converted to dwellings)

Bank Farm (A)
Paytoe farm (A)
Gotherment Farm (A)
Lower House Farm (A)
Wigmore Grange (A)
Bonesfiedl Farm (BB)
Hicks Farm (BB)
Lower Pedwardine Farm (BB)
Manor Farm (BB)*
The Hall Farm (BB)
Hill House Farm (BB)
Upper Pedwardine Farm (BB)
Wardells Farm (BB)
Court House Farm (L)
Turn Farm (L)
Brierley Hill Farm (L)
Dairy Lane Farm (L)
Mountain Buildings (L)
Red House (L)
Mynde Farm (L)
Goddic Farm
The Moor (W)
Manor Farm (W)
Walford Farm (W)
Walford Court (W)
Lower Letton Farm (W)
Upper Letton Farm (W)

Investigations are being carried out to identify those that have already been converted.

6. Summary

Table 3: Summary of Built, Commitments, Available and Rural Windfall Housing Provision Resulting from this Neighbourhood Plan.

	<i>Number of dwellings</i>
Target 2011-2031	36
Completions/under construction 2011-2014	0
Outstanding planning permissions 2014 (HC advice)	3
Rural windfall approved since 2014*	1
Windfall on edge of Lingen*	1
Land available within settlements	36
Rural windfall allowance (outstanding)	3
Total	44

*** Commitments since 2014 are:**

1. P151068/U – Certificate of Lawfulness, effectively c/u from holiday let to residential on edge of Lingen village. (14/8/2015)
2. P160267 – Prior Approval not required for conversion to dwelling at Oak Hill Barn Boresford - 1 dwelling, rural (Brampton Bryan) (6/4/2016).

Appendix 1: Herefordshire Local Plan Core Strategy - Policy RA2

Policy RA2 – Housing in settlements outside Hereford and the market towns.

To maintain and strengthen locally sustainable communities across the rural parts of Herefordshire, sustainable housing growth will be supported in or adjacent to those settlements identified in Figures 4.14 and 4.15. This will enable development that has the ability to bolster existing service provision, improve facilities and infrastructure and meet the needs of the communities concerned.

The minimum growth target in each rural Housing Market Area will be used to inform the level of housing development to be delivered in the various settlements set out in Figures 4.14 and 4.15. Neighbourhood Development Plans 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.

Housing proposals will be permitted where the following criteria are met:

- 1. Their design and layout should reflect the size, role and function of each settlement and be located within or adjacent to the main built up area. In relation to smaller settlements identified in fig 4.15 proposals will be expected to demonstrate particular attention to the form, layout, character and setting of the site and its location in that settlement and/or they result in development that contributes to or is essential to the social well-being of the settlement concerned;**
- 2. Their locations make best and full use of suitable brownfield sites wherever possible;**
- 3. They result in the development of high quality, sustainable schemes which are appropriate to their context and make a positive contribution to the surrounding environment and its landscape setting; and**
- 4. They result in the delivery of schemes that generate the size, type, tenure and range of housing that is required in particular settlements, reflecting local demand.**

Specific proposals for the delivery of local need housing will be particularly supported where they meet an identified need and their long-term retention as local needs housing is secured as such.

Border Group Housing Site Deliverability Assessment - Adforton

Site Reference	Site Analysis (Deliverable – Available and Achievable)	Estimate of Dwellings	Comments/Conclusions
A1	Barns, silage pit etc. Access may be needed to field behind although option available elsewhere. Owner recently deceased. Probate anticipated in Autumn. Family member advised will seek to develop.	5	Land was originally available and discussions suggest will be so. Developer interest.
A2	Owner has advised happy to see developed for two houses	2	Confirmed to Steering Group
A3	Owner has sought conversion of property into two dwellings for some time and is understood to have been talking to an architect.	2	Plans shown to Parish Council
Other land within settlement boundary	One owner of a number of parcels of land within the settlement boundary has indicated that development is not ruled out but would not commit to bringing any forward at present.		Insufficient evidence to indicate 'available'. Would come forward as windfalls.



Border Group Housing Site Deliverability Assessment - Lingen

Site Reference	Site Analysis (Deliverable – Available and Achievable)	Estimate of Dwellings	Comments/Conclusions
L1	Site owner approached and confirmed would seek to develop site	1	Adjoining to the built up area of village.
L2	Site owner approached and confirmed would seek to develop site. In addition confirmation of availability through a planning application submitted in past for a dwelling	1	Adjacent to the built up area of the village
L3	Agent confirmed interest in providing houses on this site	2	Part of the site contains a rural building that might be converted to a dwelling.
L4	Agent confirmed interest in providing a house on this site	1	Adjacent to the built up area of the village
L5	Owner approached and indicated would wish to develop.	5	Objection to the draft plan has been received seeking a larger development
L6	Site owner approached and confirmed he is willing to develop site.	(1)	Not counted among 'available' sites as may require archaeological evaluation to determine suitability.
L7	Site owner approached and confirmed he is willing to develop site.	1	Adjoining built up area of village. Located at its entrance and would require attention to landscaping but could make a positive contribution to village entrance



© Crown copyright and database rights [2015] Ordnance Survey 100054737

Border Group Housing Site Deliverability Assessment - Walford

Site Reference	Site Analysis (Deliverable – Available and Achievable)	Yes/No/Not Sure (Y/N/?)	Estimate of Dwellings	Comments/Conclusions
W1	The site owner has been approached as is prepared to release the site for development within the settlement boundary	Y	2	The site is outside of the area shown to be at risk of flooding. No apparent reason why the site might not be developable
W2	The estate has suggested this site especially because it falls outside the area shown to be at risk of flooding. However for financial reasons it would not wish to see the site proposed as an allocation.	Y	6 - 8	The site is outside of the area shown to be at risk of flooding. No apparent reason why the site might not be developable
Other land within settlement boundary	There are a number of other sites within the settlement boundary although most fall within the area at risk of flooding defined by the Environment Agency. It is understood works have been undertaken that may have reduced flood risk but landowners would need to put forward evidence to show this or that sites can be developed with appropriate safeguards (both to development and other properties)			



© Crown copyright and database rights [2015] Ordnance Survey 100054737