

ROSS-ON-WYE NEIGHBOURHOOD PLAN

HOUSING DEVELOPMENT SITES: OPTIONS APPRAISAL

A report prepared by Place Studio for the Neighbourhood Plan Steering Group: June 2018

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1. INTRODUCTION

This report summarises the site selection process and informs the Strategic Environmental Assessment of the Neighbourhood Plan.

- The majority of the information that follows is drawn from Herefordshire Council's SHLAA report from 2011¹.
- Since then, some other potential sites have been put forward but no Herefordshire assessments are yet available.
- All sites and their assessments were considered by the Neighbourhood Plan Steering group, advised by the consultants.
- The criteria used in the charts that follow (flood risk etc.) are those used in the SHLAA assessments and reflect national policy.
- A number of small sites were put forward and assessed in the SHLAA process (and some have been put forward since) but are not considered below because they would all qualify as infill. They are addressed as a whole within the Neighbourhood Plan, not individually.
- Sites with permissions granted since the SHLAA stage have been excluded, as well as the Herefordshire Council land holdings to the east of the A40 currently being addressed in a strategic review by Herefordshire Council.

2. SITES ASSESSED IN THE SHLAA

The chart below covers all the sites assessed in the SHLAA, showing the final conclusion (Suitable/Not Suitable) and the main criteria that determined this conclusion in each case. An 'X' indicates a criterion about a planning constraint that renders a site unsuitable or undeliverable, in line with the NPPF and the Herefordshire Local Plan.

TABLE 1: Sites assessed as unsuitable are highlighted in light grey.

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
1	Land adjacent to Ashburton Industrial Estate	2.33	4ZPP	G	X						Possible employment use	? See later ²
2	Land to east of Brampton Road	3.32	C2BC	G								No Covenant for use as recreation land
3	Land adjacent to Tudorville	19.69	HAAA/028/003	G		X			X			No

¹ https://www.herefordshire.gov.uk/directory_record/2143/strategic_housing_land_availability_assessment_2011_-_archived

² The situation for this site and site 15 have changed since the SHLAA. This is addressed in section 4.

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
4	Land off Brampton Road west, Greytrees	3.11	HLAA/107/001	G		X			X			No
5	Land to the south of Cleeve Lane	11.01	HLAA/176/001	G		X			X		Despite the title, this is at the northern end of Cleeve Lane	No
6	Land to the south of Cleeve Lane (2)	8.11	HLAA/177/001	G					X			? Part only supported, see later
7	Stoney Stile	1.72	HLAA/192/001	G								YES (part)
8	Land at Merrivale	1.23	HLAA/324/001								Incomplete and inconsistent listing in the SHLAA	YES But see later
9	Land to the south of Alton Road Industrial Estate	16.98	O/Ross/007	G		X			X		Also see 11 below	YES But see later
10	Land at Alton Court Farm	12.03	O/Ross/008	G					X			No
11	Land to the rear of Castlemeadow	2.58	O/Ross/009	G		X			X			No
12	Land south of Greytrees Road	9.59	O/Ross/010	G	X				X	X		No
13	Land at Blackfields	9.25	O/Ross/011	G	X				X			No

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
14	Land off Brampton Road North, Greytree	3.11	P1004/1	G		X						No
15	Land at Broadmeadow (The extent of this area has changed)	15.15	W461	G/B	X	X					Possible with flood remediation to remove parts of the site from Zone 3	? See later
16	Land off Fernbank Road	0.9	HLAA/199/004	G		X			X		See note on Option 4 later	No
17	Land off Wilton View, Greytree	0.97	P1046	G				X	X	X		No

The following sites were submitted and assessed during the SHLAA process but lie outside but close to the settlement:

- HLAA/191/002
- HLAA/198/001
- HLAA/018/002
- HLAA/018/003
- HLAA/177/001
- HLAA/198/001
- HLAA/265/001
- O/Ross/012
- P1022

The following sites were assessed in the SHLAA but form part of the large area to the east of the A40. They are, together, considered to be strategic in nature and therefore outside the scope of the Neighbourhood Plan.

- O/Ross/002
- O/Ross/003
- O/Ross/004
- O/Ross/005
- O/Ross/006

The summary assessments by Herefordshire Council of all of the above sites are included in Appendix 1.

3. ADDITIONAL SITES

Since the SHLAA as above, four other potential sites have come forward. These have been assessed by the Steering Group's professional consultants, see below, using the same criteria as above.

- Sites A and C were submitted in the more recent Herefordshire call for sites in rural areas, though they are not rural.
- Site B was submitted to the Steering Group during the plan preparation process.
- Site D only became available as a result of a recent decision to relocate the Children's Centre.

TABLE 2

No.	Name	Size (ha)	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
A	Alton Court Field	8.9	G					X		A part of site 10 above	NO
B	The Chase Hotel	4.9	G/B				X	X	X		YES
C	Wyevale Kennels	0.37	B		X			X		Part of the overall Tanyard area, see later	YES
D	Ryefield Children's Centre	0.37	B				X				YES

4. EVALUATION

Support

The Steering Group and their professional consultants support the conclusions above that the following sites are suitable if proposals successfully address the points raised in the assessments:

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
6	Land to the south of Cleeve Lane (2)	8.11	HLAA/177/001	G					X			? Part only supported, see later
7	Stoney Stile	1.72	HLAA/192/001	G								YES (part)
8	Land at Merrivale	1.23	HLAA/324/001								Incomplete and inconsistent listing in the SHLAA	YES But see later

In addition, the following sites that have come forward since the SHLAA are also supported:

No.	Name	Size (ha)	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
B	The Chase Hotel	4.9	G/B				X	X	X		YES
D	Ryefield Children's Centre	0.37	B				X				YES

The Wyevale Kennels site (C in Table 2) is considered within all of the Broadmeadows/Tanyard area, addressed later.

Not Support

The Steering Group and their professional consultants do not support the conclusions above about the following site:

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
9	Land to the south of Alton Road Industrial Estate	16.98	O/Ross/007	G		X			X		Also see 11 below	YES But see later

It is the view of the Steering Group and their professional consultants that the site should be rejected in total because of the considerable significance of all of the swathe of green land between the Town and County Trail and the woodland on the hills of Penyard Park. The officer's support is particularly concerning because of their rejection for landscape impact reasons of the continuation of this swathe of land into Alton Court Farm (site 10: O/Ross/008). The importance in landscape terms of this whole swathe of land, not just the part to the south west, is addressed in the landscape sections of, and the evidence for, the main Neighbourhood Plan and in the Character Portfolio. It is therefore also considered to be outside the Settlement Boundary.

In addition, the firing range remains in regular use and the Hildersley development has had to be reduced in its western side because of the serious noise impacts of the range. That restriction would apply equally to much of the eastern part of this site until the firing range ceased to be used.

Changed Circumstances

Some aspects of the circumstances of two of the above SHLAA sites have changed considerably since work started on the Neighbourhood Plan:

No.	Name	Size (ha)	SHLAA Ref.	Green: G Brown: B	Flood Risk	Highways & Access	Utilities	Heritage	L.scape	Ecology	Other Comments	SUITABLE?
1	Land adjacent to Ashburton Industrial Estate	2.33	4ZPP	G	X						Possible employment use	? See later
15	Land at Broadmeadows	15.15	W461	G/B	X	X					Flood remediation could remove parts of the site from Zone 3	? See later

The key changes are as follows:

- An 87 home development has already taken place on the north eastern corner of site 15, accessed off a roundabout on the A40.
- The developers of the former Laundry and Sawmills sites between Ledbury Road and Tanyard Lane are in pre-application discussions for 21 homes.
- The same developer had in 2005 worked jointly with Herefordshire Council on a 150 home Development Brief for all of the Tanyard Lane area (the northern part of site 15).
- The owner of the caravan park is now willing to sell the land. This includes some associated land just north of the Rudhall brook and the area of open space and balancing ponds to the south of the camping area.
- The ponds area is itself adjacent to site 1 (4ZPP), making it appropriate for inclusion with sites 1 and 15 in an overall potential development area.
- Recent flood mitigation work has produced a small reduction in the Flood Zone 3 area of site 15.

As a result of these changes and other considerations, the whole site – a combination of sites 1, 15 and C as well as the caravan park site and part of King's Acre - is now termed Broadmeadows/Tanyard.

Broadmeadows/Tanyard

The Steering Group have, from the start of Neighbourhood Plan work, highlighted this whole area as a key priority (as did many people during public consultation) because it is in effect a very large 'wedge' of poor quality, partly brownfield, poorly used and largely undeveloped land. A positive future for all of this land is seen as a key priority by and for local people and, in addition, its development would provide a clear and positive link to other almost certain developments east of the A40 (a link not possible anywhere else along the length of that road).

The primary concern in the assessments of this whole area is flood risk, although there was also some concern about potential and known contamination. Not all of the land is in Flood Zone 3 (notably most of the Tanyard Lane field and adjacent land) and there is the potential for adopting a mixed development approach that would, for certain uses, be less constrained by flood risk issues (as the assessment of site 1 makes clear with its suggestion of employment uses). The mixed development approach is supported in principle by Herefordshire Council officers. However, piecemeal development would almost certainly fail to produce a coherent solution to what is probably better termed a 'regeneration area', nor would it provide the necessary financial viability for all of the development to proceed. The three key principles behind the approach included in the Neighbourhood Plan (and elaborated more fully in the plan and an associated report) are therefore:

- One overall masterplan is necessary;
- this should be delivered through financial equalisation across the whole site and
- solutions are dependent on a proven whole site approach to mitigating flood risk.

5. OPTIONS

The Herefordshire Local Plan requires the delivery of at least 900 new homes in Ross-on-Wye by 2031, plus some contingency. Purely for illustration (no precise contingency requirement is set), a 10% contingency of 90 would create a total target of 990 and a 15% contingency of 130 would create a total target of 1,035.

Based on the site assessments that have been undertaken and summarised here, the following policy options were identified as part of the Neighbourhood Plan process.

Option 1: No additional allocations in the Neighbourhood Plan

At the time of writing this Neighbourhood Plan (April 2018), Herefordshire Council's figures for built, committed and strategic sites (in this case Hildersley) totalled 914 houses (see Appendix 2). (The committed sites include the large site of Pigeon House, east of the A40.) The 914 figure includes 200 for the strategic site at Hildersley but the latest permission (granted March 2017) is for 212 on part only of that site.

Option 1: With no further additions to the figures above – totaling 928 - and without the Neighbourhood Plan, the target figure of 900 houses would be achieved but with only a 3% contingency.

NB. In terms of other known or likely developments, there is currently an application with Herefordshire Council for 34 houses at Cawdor Gardens and one is likely to be submitted shortly for 21 on the Old Laundry site on Ledbury Road. These total a further 55 houses. (The Cawdor application is at: www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=173190&search=cawdor%20gardens)

Option 2A: Allocate major sites deemed suitable and deliverable

This option suggests the allocation of sites 6, 8, 7, B and D above as follows:

- Cleeve Field: c. 18-20 houses
- Merrivale Lane: c. 30
- Stoney Stile: c. 25
- The Chase Hotel: c. 5-10
- Ryfield Centre: c.10-12
- Total: c. 88-97

Option 2: Adding the known figures from option 1 and the proposed allocated sites figures (the lower one of 88) produces a total of 1,071. This would provide a contingency of 19%. (More than this if the 55 mentioned earlier gain approval.)

Option 2B: As 2A with the addition of Broadmeadows/Tanyard

At the time of the assessments, there was uncertainty about the suitability of the main area of what is now termed Broadmeadows/Tanyard. The Neighbourhood Plan includes this whole area but, without all the necessary technical information, it cannot be included as an allocation. It is only included as a potential development location.

The government encourages Neighbourhood Plans to take an assertive approach to housing target numbers and, where possible, exceed any given target. It is also the view of the Neighbourhood Plan Steering Group that they would prefer to include all possible developments in the plan to maximise the community's influence over their details. In addition, Broadmeadows/Tanyard is a fundamentally important area of as yet undeveloped land clearly within the built area of Ross, if one takes the A40 as the current eastern boundary. (Further, the Town Council is in discussion with a neighbouring Parish Council about the possibility of taking over a small part, approx. 15 homes, of their Local Plan requirement which cannot be accommodated in a viable manner within that parish. See later.)

The area for housing development on Broadmeadows/Tanyard is not yet precisely defined but it is in the order of 10-11 hectares and could therefore deliver around 300 houses.

Option 3: The inclusion of Broadmeadows/Tanyard. This would raise the potential delivery figure to c. 1,350, well above the target and any standard contingency. As well as removing what is mainly extremely unattractive land in all environmental terms, development of this large area of land would bring considerable social and economic benefits to the town.

Option 3: Reconsider and potentially allocate land currently assessed as unsuitable

One further option could be to reconsider other sites put forward during the SHLAA process but assessed as unsuitable by Herefordshire Council – assessments fully supported by the Neighbourhood Plan Steering Group. Some of these, notably 2 and 12 above are within the main settlement but raise challenges (no.12 in particular has witnessed refusals of permission before). Site 16: HLAA/199/004 was assessed as unsuitable but permission has been granted for a small part of the site. All others are beyond the current settlement boundary and almost all raise significant concerns about landscape impact in particular, some raising other issues that imply considerable environmental damage such that their allocation would be harmful and contrary to national policy. As of now, it is not possible to suggest which might survive reconsideration, although it must be pointed out that further numbers do not appear to be needed, so key criteria about, for example, landscape impact, should not be weakened.

Option 4: Reconsider sites previously assessed as unsuitable by Herefordshire Council. Effect on numbers unknown.

Conclusion

Option 2B is the preferred option, subject to consideration of the value that could be given to the inclusion of the Broadmeadows/Tanyard area. If that inclusion cannot be supported, Option 2A would be the preferred option.

6. SUPPLEMENTARY NUMBERS

A Memorandum of Understanding has been signed by Ross-on-Wye Town Council and Bridstow Parish Council to the effect that the Ross-on-Wye Neighbourhood Plan could add to its housing targets by taking c.15 houses from Bridstow's allocated target. This is subject to final agreement on the numbers outlined above and the selection of one of the listed options.

APPENDIX 1: FULL SUMMARY TEXT FROM HEREFORDSHIRE SHLAA ASSESSMENTS

1. **4ZPP: Land adjacent to Ashburton Industrial Estate:** *"The site has historically flooded and is not considered suitable for (housing) development"*.
2. **C2BC: Land to east of Brampton Road:** *"The site was originally allocated for employment uses. The site remained undeveloped and was identified for playing fields for John Kyrle High School and protected with a related covenant. Should the covenant cease, the site should return to an employment allocation as the site has more of a relationship with the adjoining employment uses. Loss would be subject to Sport"*.
3. **HLAA/018.003: Land adjacent to Tudorville:** *"No, the site forms attractive rising land, which is rural in nature and contributes to the setting of Ross-on-Wye. The caravan park forms the limits to the development and should not be breeched. Western portion is deliverable and 1/3 of the site is available."* (NB. A small development to the north of this site has now been given approval.)
4. **HLAA/017/001: Land off Brampton Road, Greytrees:** *"This large elevated site within the AONB is not considered a suitable extension of the town for housing development principally on access grounds and if access could be achieved, any development of the site would have a significant impact on the landscape value of the area"*.
5. **HLAA/176/001: Land to the south of Cleeve Lane:** *"No due to landscape impact and effect on John Kyrle Walk"*.
6. **HLAA/177/001: Land to the south of Cleeve Lane:** *"This relatively well contained site is adjacent to existing housing. Traffic generation and access to the town centre, along with development within an AONB, are significant constraints. In addition, the site's close proximity to an intensive livestock unit could reduce its development potential. Only land on the eastern boundary is considered to have potential with adjoining land being capable of development but with a significant impact on the surrounding landscape"*.
7. **HLAA/191/001: Arbour Hill, Watling Street:** *"This land forms open countryside. Land to the west is elevated. Development on this land would be unacceptably dominant in visual terms"*.
8. **HLAA/192/001: Stoney Stile:** *"There is potential for housing on the lower southern section outside of the Conservation Area provided safe/satisfactory access can be secured"*.
9. **HLAA/324/001: Land at Merrivale:** *"The site is (in) a predominantly residential area and, subject to overcoming (a) covenant issue, is suitable for development"*.
10. **O/Ross/007: Land to the south of Alton Road Industrial Estate** (this also includes a strip of land submitted separately: HLAA/199/002): *"The site is considered suitable for development with the provision of a strong landscape boundary to the south and east reinforcing the break in slope up to the woods to the east and to screen any views. The existence of the aquifer and the rifle range form potential constraints to development. The Defence Estates have confirmed that their site would only (be) available for development if a compensatory rifle range is provided at Credenhill. This site has been phased accordingly. Access would need to be off the A40"*.

11. **O/Ross/008: Land at Alton Court Farm:** *"The site is not considered suitable on landscape grounds"*.
12. **O/Ross/009: Land to the rear of Castlemeadow:** *"No, on landscape and access grounds"*.
13. **O/Ross/010: Land south of Greytree Road:** *"Site is on land liable to flood and forms part of the setting of the River Wye and town centre"*.
14. **O/Ross/011: Land at Blackfields:** *"Site is on land liable to flood and forms part of the setting of the River Wye and town centre"*.
15. **O/Ross/012: Land at Netherton:** *"Access to the site is very poor and the attractive rural setting of the undulating site needs to be protected from development. There is also a flood risk around the pond area"*.
16. **P1004/1: Land off Brampton Road North, Greytree:** *"No, due to access constraints"*.
17. **P/1022: Land north of Overross Industrial Estate:** *"This site lies directly north of employment uses and has no relationship with other residential development or facilities of the town and lies in a high quality landscape classified as AONB"*.
18. **W461: Land at Broadmeadows.** At the time of the assessment, the site totaled around 15 hectares. Since 2011, part of the site to the north east has been developed for housing. Also at the time of assessment, the area of King's Acre, just beyond the western boundary of the 2011 site, was not included or assessed but is now included in the proposed overall site. Site 1 above is now considered as part of then overall development. As a result, the assessment from 2011 warrants inclusion here in full, as below:
 - **"Summary Description:** *Derelict land and buildings, caravan site, commercial buildings, agricultural land. This is a flat, contained site which is well screened to the west becoming more visible from the A40 to the east. Views into site: Views from the A40. Adjacent/surrounding land: Mixture of retail, industrial and residential properties. Protected employment land to south east. Access could be achieved onto A40 or off Station Street. Site integration: The site is well related to the built form of Ross and would integrate. Northern part is allocated for housing within the UDP where a planning permission has followed. Height and character: Mixture of retail, industrial and residential properties.*
 - **Flood Information:** *The site is classified as being partially in zone 3 and the risk of fluvial flooding may be high. The proposed use is needs checking on the basis of the relevant flood zone. PPS25 exception test may be required for this development in this flood zone*
 - **Water information:** Sewerage: *Parts of the public sewerage network suffer from hydraulic overloading. No regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this site be developed in advance of any regulatory improvements, developers may be required to fund the essential improvements. Sewage treatment:* *The total allocations proposed for this area would overload the design capacity of the Waste Water Treatment Works. Dwr Cymru Welsh Water would require the Council to release the allocations at a later stage in the plan proces to allow sufficient time to undertake essential improvements. Should any development occur in advance of Dwr Cymru Welsh Water's Capital Investment, developers may be required to fund the essential improvements. Water supply:* *The development of this proposed site would require off-site mainlaying from a point of adequacy on larger diameter/pressure watermains. Where off-site watermains are required, these can be provided under a water requisition scheme, the costs of which would be borne by potential developers.*
 - **Landscape:** *Northern third of site: Medium - Low Sensitivity: The site has limited intrinsic value as a landscape resource and/or key characteristics*

of landscape are resilient to change.

- **Historic landscape:** Sensitivity 1. Areas where high historic environment values have been identified, and where large scale new development is therefore likely to have significant impact on the integrity of the inherited landscape. Some closely restricted development may occur as informed by detailed historic environment impact and design studies
- **Highways information:** Part of the site subject to planning permission under Tanyard Lane. Site suffers from very poor links to town which would need to be substantially improved. Site lacks potential but could be linked to O/Ross/16. This development access would require roundabout/lights and be part of a scheme to model Ross traffic network.
- **Biodiversity:** Western portion contains semi-natural habitats and wildlife corridors which will constrain development. Remainder of site comprises arable land where ecological constraints are likely to be limited
- **Is the site suitable (and achievable) for development?:** Most of the southern portion of this land is identified as land liable to flood. Flood alleviation works are underway. The site is only considered suitable for development if the risk of flood is overcome through the flood works. If this happens it is considered that the site could be utilised for further housing
- **Can the entire site be developed?:** Only when this land is removed from the flood plain."

APPENDIX 2: 2018 FIGURES

The following information was received from Herefordshire Council on 1st March 2018:

"Please find attached the current housing figure for Ross on Wye as at April 2017.

Core Strategy minimum growth – 900

Built as at April 2017 – 306

Commitments as at April 2017 – 118

Strategic site – 200 (the deemed consent of the site has not been included within the figures below)

Commitments post April 2017 – 290

Total – 914"