

Abberley Neighbourhood Development Plan

Housing delivery report

DJN Planning Limited

June 2019

For Abberley Parish Council

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1. Introduction

- 1.1 Abberley Parish Council is preparing a Neighbourhood Development Plan (NDP). A Neighbourhood Area was designated in August 2015. Much evidence gathering work has been undertaken including a questionnaire survey of local residents and engagement with local businesses.
- 1.2 An important role of the Plan is to provide guidance on the scale and location of new housing development, to help meet needs overall and to address community requirements. This Report provides evidence and recommendations to the Parish Council to inform the approach to be taken in the NDP. It is intended to complement a Housing Needs Assessment produced by AECOM for the Parish Council.
- 1.3 The NDP is being prepared at a time when the planning policy context set by the South Worcestershire Development Plan (SWDP) is under review. At present the SWDP runs to 2030; the review will extend the plan period to 2041. This end-date is also being adopted for the NDP. The scope of the review includes the overall planning strategy for South Worcestershire as well as existing development boundaries and site allocations. Additional housing will be needed, and a Call for Sites was undertaken by the South Worcestershire local planning authorities in 2018.
- 1.4 The Report addresses how best to progress the NDP in this emerging planning policy context. It takes account of recent dwelling completions, existing development plan allocations and planning permissions; considers the scope for a windfall allowance; and includes an assessment of potential housing sites.
- 1.5 The Report assesses the two sites at Abberley Common which were put forward in response to the recent SWDP Call for Sites. A third site at Abberley, allocated for development in the SWDP but which has not yet come forward, is also assessed.
- 1.6 The Report concludes with conclusions and recommendations as to the approach to housing delivery to take forward in the NDP, together with an associated development boundary at Abberley Common. To reach conclusions, a number of working assumptions have been made as to how the SWDP review will progress. Since these are inevitably contingent on emerging outcomes from the review, continuing engagement with this process is recommended.

2. Planning policy and evidence base context

- 2.1 This section outlines the national, district and neighbourhood planning contexts within which the Report has been prepared and summarises relevant parts of the evidence base.

National Planning Policy Framework (NPPF)

- 2.2 The NPPF supports the Government's objective of significantly boosting the supply of housing. Strategic policies should be informed by a local housing need assessment, conducted using the standard method, in order to establish a local housing need figure.¹
- 2.3 Strategic authorities should establish a housing requirement figure for their area to show how the identified housing need can be met over the plan period. They should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.²
- 2.4 In situations where such a requirement figure for a neighbourhood area cannot be provided (for example, because the neighbourhood area is designated after strategic policies have been adopted), an indicative figure should be provided by the local planning authority on request by the neighbourhood planning body. This should take account of factors such as the latest evidence of housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.³
- 2.5 The NPPF requires strategic policy-making authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). From this, policies should identify a sufficient supply of sites, taking into account their availability, suitability and likely economic viability, for years one to five of the plan period, years 6-10 and where possible years 11-15.⁴
- 2.6 The NPPF recognises that small and medium sized sites can make an important contribution to meet the housing requirement of an area. Neighbourhood planning groups should consider the opportunities for allocating small and medium-sized sites (no larger than one hectare) suitable for housing in their area.⁵
- 2.7 Any allowance made for windfall sites as part of an anticipated supply should be supported by compelling evidence that they will provide a reliable source of supply. Such an allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.⁶

¹ NPPF paragraphs 59 and 60.

² NPPF paragraph 65.

³ NPPF paragraph 66.

⁴ NPPF paragraph 67.

⁵ NPPF paragraphs 68 and 69.

⁶ NPPF paragraph 70.

Planning Practice Guidance (PPG)

- 2.8 PPG is an on-line suite of planning guidance published by Government.⁷ It includes detailed guidance on the undertaking of housing and economic land availability assessments for use primarily by local planning authorities.⁸ PPG suggests neighbourhood planning bodies may use the methodology to assess sites but any assessment should be proportionate. They should also refer to existing site assessments prepared by the local planning authority when identifying sites to allocate within a neighbourhood development plan.⁹

South Worcestershire Development Plan (SWDP)

- 2.9 The SWDP was adopted by the three South Worcestershire Councils on 25 February 2016. It has a plan period of 2006-2030. The planning strategy is one of urban concentration to enable the long-term growth of Worcester with other development focussed at the towns of Droitwich Spa, Evesham, Malvern and Pershore. Rural settlements are categorised on the basis of their services and facilities, and include in the Neighbourhood Area:
- Abberley Common, a Category 1 settlement, the highest level; and
 - Abberley Village, a Category 4A settlement.
- 2.10 The SWDP defines a development boundary for Abberley Common, but not for Abberley Village. Policy SWDP2 allows infill development in principle within development boundaries, and provides for site allocations in Category 1 villages. This is intended to help provide for local needs in the rural areas (together with completions, commitments and windfalls). Three sites are allocated at Abberley Common (policy SWDP59):
- SWDP59/1, land at the Orchard, indicative number of dwellings 6 on 0.85 ha;
 - SWDP59a, land at Walshes Farm, indicative number of dwellings 15 on 1.43 ha;
 - SWDP59/2, land west of Apostles Oak Cottage, indicative number of dwellings 14 on 0.37 ha.
- 2.11 These site allocations were informed by SHLAA assessments, the latest of which was published in April 2015.¹⁰ A total of ten sites were considered at Abberley Common. The allocations appear to mainly reflect site-specific criteria as to suitability,¹¹ rather than parish-specific factors such as population. Averaged over the plan period, they equate to an annual delivery of just under 1.5 units.

⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

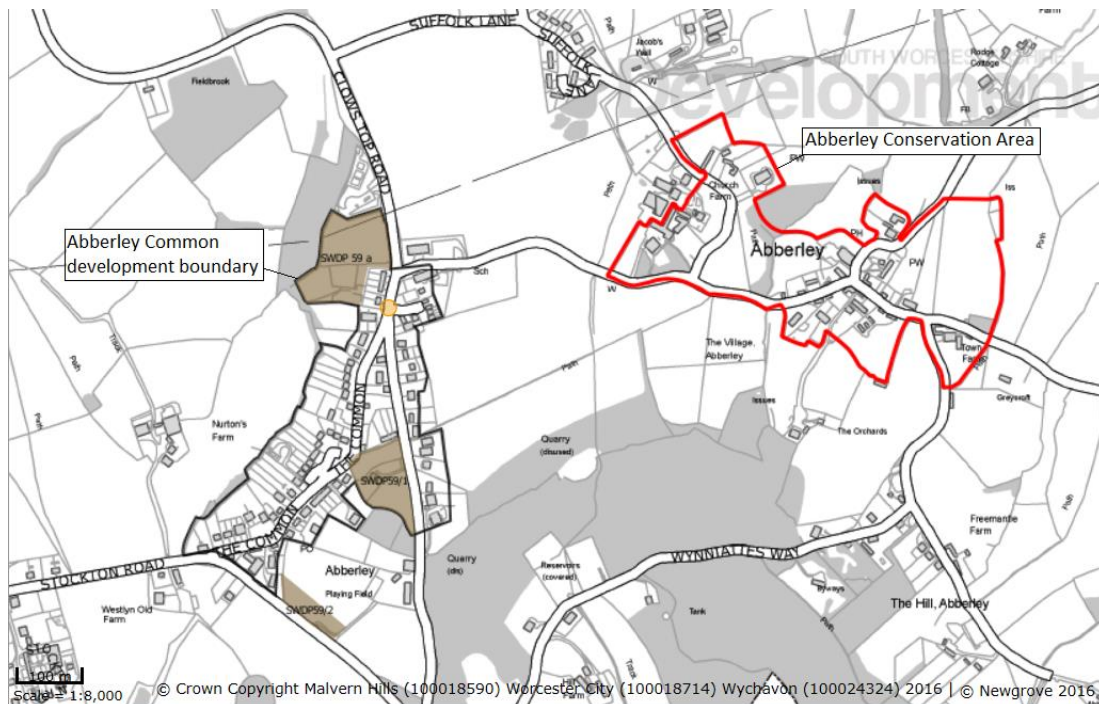
⁸ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

⁹ Paragraph: 004 Reference ID: 3-004-20140306

¹⁰ http://www.swdevelopmentplan.org/?page_id=4884

¹¹ See SWDP Non-strategic Housing Allocations Background Paper, December 2012 at <https://www.swdevelopmentplan.org/wp-content/uploads/2012/12/SiteSelectionBackgroundPaperDec2012.pdf>. This ruled the Orchard and Apostles Oak sites 'in' the SWDP. The Walshes Farm site was ruled out but was allocated nonetheless.

- 2.12 Abberley Village lies to the east of Abberley Common and falls within open countryside where development will be strictly controlled. It has a designated Conservation Area whose boundary was reviewed in 2010.
- 2.13 Plan 1 is an extract from the interactive SWDP Policies Map showing the two settlements and the above boundaries and allocations. Note that unusually the allocation west of Apostles Oak Cottage at Abberley Common (SWDP59/2) is outside the defined development boundary.



Plan 1: SWDP Policies Map extract

South Worcestershire Development Plan Review (SWDPR)

- 2.14 In late 2017, the three South Worcestershire Councils embarked on a review of the SWDP to cover the period 2016-2041. To inform the review, an assessment was undertaken of housing need in South Worcestershire.¹² Based on the situation at 31st March 2018 (the end of the most recent monitoring period), it is anticipated that the SWDPR needs to make provision for approximately 14,000 dwellings for the period up until 2041. This is in addition to those which have already been delivered or are likely to be delivered through

¹² <http://www.swdevelopmentplan.org/wp-content/uploads/2018/10/Housing-Need-in-South-Worcestershire-Final-Report.pdf>

the provisions of the current SWDP i.e. planning permissions, outstanding site allocations and an allowance for windfalls.

- 2.15 A Call for Sites was held between May and July 2018 with the aim of identifying land for future development for housing and employment purposes. The suitability, availability and deliverability of the submitted sites is being considered in a Strategic Housing and Employment Land Availability Assessment (SHELAA) which is ongoing.¹³ A methodology for the Assessment was published in November 2018 which takes into account both the NPPF and PPG. The outcome of the SHELAA will inform options for the development of South Worcestershire which will be set out in a Preferred Options consultation document in November 2019.
- 2.16 As well as sites submitted via the Call for Sites, the Assessment will also look at existing SWDP housing and employment allocations which do not have planning permission and sites with planning permission for housing and economic development that are unimplemented. All the allocations at Abberley Common fall into one or both of these categories at this time.
- 2.17 Finally, an Issues and Options consultation was held in November-December 2018 to inform the development of policy in the SWDPR. Abberley Parish Council responded to this consultation, and also made comment on an earlier draft methodology to be used for the review of development boundaries. Continuing positive engagement with the SWDPR will be important, as the review process may well 'move the goalposts' for the NDP, for instance in terms of planning strategy, treatment of windfalls and site allocations.

NDP questionnaire survey

- 2.18 The survey was undertaken in 2017 and received 118 responses covering 173 individuals. This latter figure represents 21% of the Parish population in 2011 (836). Key findings in relation to housing were:
- In terms of creating a better community (Q8), 22.5% (31 replies) wanted to see more affordable housing.
 - If a new household was to be formed from an existing (Q25), most envisaged buying (77.8%) followed by renting (20.6%).
 - The top ten most important aspects of new development in Abberley (Q27) were in descending order:
 - Development that fits into the landscape (73.6%)
 - Parking spaces for more than one car per household (54.3%)
 - Setting of properties within landscape (53.5%)
 - Design and style of the houses (50.4%)
 - Housing that local 1st time buyers can afford (48%)
 - Sustainability (41.9%)

¹³ http://www.swdevelopmentplan.org/?page_id=14130

- More green spaces (34.1%)
- Good sized gardens (31.8%)
- Housing that local renters can afford (30.2%)
- More one or two bedroom properties (22.5%).

Draft Housing Needs Assessment for the Neighbourhood Area

2.19 Key recommendations and findings from the draft AECOM Assessment¹⁴ are:

- a confirmed indicative housing requirement of 15 dwellings (rounded) over the 2021-2041 period, an average annual rate of 1.3 dwellings per year;
- that housing options in Abberley for households on lower incomes are limited;
- a recommended tenure split of 70-80% owned and 20-30% rented;
- in line with SWDP policy 15, 20-40% of homes should be affordable, spread across entry level market sale and rent; starter homes; shared ownership; and affordable and social rent;
- that demographic forecasts justify building more homes of all types and sizes, particularly smaller family housing (3 bedrooms and smaller) and housing for the elderly; and
- that there is a need arising from the parish of 35 additional specialist accommodation units, whilst acknowledging that there is no specific requirement for them to be provided within the Parish itself and that indeed it would likely not be economically or sustainably feasible to do so.

¹⁴ AECOM, draft Abberley Housing Needs Assessment, April 2019.

3. Indicative housing requirement

- 3.1 The three South Worcestershire Councils have developed a methodology to help provide indicative housing requirement figures to neighbourhood planning bodies. As set out in para. 2.4 above the supply of such figures on request is a requirement of the NPPF.¹⁵
- 3.2 The methodology takes as its starting point an assumption that the provisions of the SWDP (including its site allocations) will be sufficient to meet housing need up to 2030. The three SWDP site allocations at Abberley Common total 35 dwellings. This level of growth forms part of the SWDP strategy to meet overall housing need. The implication is that the NDP will need to allow for the growth already directed to the Neighbourhood Area through the SWDP. In any event, a further constraining factor is that the NDP may be examined in terms of its general conformity with the SWDP - dependent on the progress made with the review.
- 3.3 There are outstanding questions as to the implications of the review for both the current planning strategy and site allocations. The strategy may change – although this seems unlikely. The methodology assumes it will continue as now in terms of the proportions of development directed to the towns and the rural areas. SWDP site allocations which have not been implemented will be reviewed and may fall by the wayside as a result. These matters will become clearer as both the SWDP and NPD progress. At this stage, a reasonable working assumption for the NDP is that it should take as a starting point the level of growth represented by the SWDP site allocations – if not the allocations themselves.
- 3.4 Returning to the methodology, it then proceeds to apportion the additional housing growth required up to 2041 (see para. 2.14). This is done on the basis of the current planning strategy, having regard to Abberley's population as a percentage of the total population of rural parishes in South Worcestershire. This results in the following indicative housing requirements (Appendix A):
- 2021-2030: 0.47 dwelling (rounded to 1 dwelling)
- 2031-2041: 14.4 dwellings (rounded to 14 dwellings).
- 3.5 It is also worth emphasising that the requirement figures are minima, and should not be interpreted as precise targets or caps.
- 3.6 The NDP will need to demonstrate how these housing requirements can be met. How best to do this requires an understanding of the progress made to date in delivering housing in the Neighbourhood Area on the one hand, and of the merits of the new Call for Sites submissions on the other. These matters are now addressed in sections 4 and 5 respectively before discussion of a way forward in the concluding section.

¹⁵ NPPF paragraph 66.

4. Housing delivery

SWDP allocated sites

4.1 The present position on the three SWDP allocation sites is summarised below.

SWDP59/1, land at the Orchard.

4.2 There is no relevant planning history for this site. It is understood that preliminary site investigation work was carried out in 2018.

SWDP59a, land at Walshes Farm.

4.3 This site has outline planning permission 16/00816/OUT for up to 26 dwellings, granted on 28/9/2018. This represents an increase of 11 dwellings over the indicative SWDP capacity of 15 dwellings. All matters except for access are reserved. A reserved matters application 19/00451/RM for the erection of 26 dwellings was validated on 24/4/2019 and is in process.

SWDP59/2, land west of Apostles Oak Cottage.

4.4 Planning permission 14/01122/OUT for up to 25 dwellings was granted on appeal¹⁶ on 9/5/2016. All matters are reserved. The application redline boundary is for a larger area than the SWDP allocation, which is restricted to the A443 road frontage and takes only part of a larger field. The permitted area is 1.6 ha. and extends to the whole of the field. The Inspector determined the appeal on the basis that a 5-year supply of housing land existed. The appeal permission confirms capacity for an additional 11 units over the indicative SWDP figure. A reserved matters application 19/00674/RM for residential development of 25 dwellings was validated on 7/5/2019 and is in process.

Windfalls

4.5 Windfalls are defined in the NPPF as sites not specifically identified in the development plan. As mentioned in section 2, national planning policy allows an allowance to be made for windfalls as part of anticipated housing supply where there is compelling evidence that they will provide a reliable source of supply, having regard to the SHLAA/SHELAA, historic windfall delivery rates and expected future trends.¹⁷

4.6 Historic windfall delivery rates in the Neighbourhood Area are shown in Table 1 using information from Malvern Hills District Council housing land monitoring (site details are at Appendix B). This includes both completions and other commitments (sites with planning permission/prior approval).¹⁸

¹⁶ APP/J1860/W/16/3144810

¹⁷ NPPF paragraph 70.

¹⁸ Available at <https://www.malvern hills.gov.uk/housing-land-monitoring>

Year	No. of units (net)
2006-7	3
2007-8	1
2008-9	2
2009-10	1
2010-11	0
2011-12	0
2012-13	0
2013-14	0
2014-15	0
2015-16	0
2016-17	1
2017-18	0
2018-19	1
Other commitments	4
Total	13
Average per annum	1.0

Table 1: Historic windfall delivery rates for Abberley parish

- 4.7 Taking into account both completions and commitments, windfalls have arisen at a rate of one unit per annum over the SWDP period since 2006. The additional housing units which have come forward on the allocation sites, over and above the indicative SWDP figures, are not included in the windfall calculation. This is because the sites involved were identified in the development plan and such provision is unlikely to be repeated elsewhere.
- 4.8 The indicative housing requirement methodology indicates that “windfall development within the designated neighbourhood area since the adoption of the SWDP in February 2016 would ... count towards meeting the housing requirement figure”. However, this introduces a risk of double-counting. This is because the SWDP incorporates an allowance for windfalls up to 2030 as part of its overall strategy for meeting housing need. When considering how the indicative housing requirement (which largely addresses housing need 2031-2041) is to be met, it would be prudent to restrict any windfall allowance to the 2030-2041 period.

5. Site assessment

Sites for assessment

5.1 To provide further evidence to inform the NDP, assessments have been undertaken of sites in the following categories:

- Sites submitted to the SWDPR Call for Sites; and
- SWDP site allocation where no progress has been demonstrated.

5.2 Two sites to the east of Abberley Common were submitted to the Call for Sites. The reference numbers and labels given to these sites by the SWDPR team are also used here to assist cross-referencing. The SWDP allocation SWDP59/1 on land at the Orchard has not come forward and is also included for assessment. The three sites are shown in table 2 and Plan 2.

Site ref	Location
CFS0601	Land east of Clows Top Road, Abberley
CFS0603	Land to the rear of Clows Top Road, Abberley
SWDP59/1	Land at the Orchard, Abberley Common

Table 2: Sites for assessment at Abberley Common

5.3 The two other SWDP allocation sites are being actively progressed and have not been assessed. Both have outline planning permission and reserved matters applications awaiting determination.

Approach to assessment

5.4 Site assessments have been undertaken having regard to PPG and the 2018 SHELAA methodology. The aim has been to provide assessments which are consistent with those being undertaken for the SWDPR, to enable sharing of information, whilst also being proportionate.

5.5 Information on each site has been collected through a combination of desk-based research and site survey. 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, steep topography, flooding and natural features of significance
- planning, heritage and environmental designations and allocations
- previous SHLAA findings
- planning history

- 5.6 The results of the assessment have been collated together for each site on a standard assessment form. Completed assessment forms can be found at Appendix C. From this information, an overall assessment is made of each site in terms of its suitability, availability, achievability, capacity, and overall potential for allocation in the NDP.

Suitability

- 5.7 This takes into account information on the factors set out above derived from site survey and desk research. All the assessed sites have been visited.

Availability

- 5.8 As evidenced in the 2018 Call for Sites submissions or local information.

Achievability

- 5.9 This is based on the viability assessments reported in the 2015 SHLAA.

Capacity

- 5.10 The capacity of each site in terms of numbers of dwellings has been estimated. This takes account of any evidence provided in site submissions and other local information pertinent to the site. The SWDP indicates that village sites should be developed at an average net density of 30 dwellings per ha. (SWDP 13), although the 2015 SHLAA prefers 25 dph. This latter figure has been used as a guide. Actual achieved densities will reflect decisions taken in scheme design, the mix of properties (size and type) and local factors.
- 5.11 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.

Concluding assessment

- 5.12 A concluding summary assessment provides a basis for recommendations as to whether the site should proceed as a potential option or be discounted from further consideration at this stage.

Summary of site assessments

Land east of Clows Top Road, Abberley (CFS0601)

- 5.13 There are significant factors militating against the allocation of this site for residential development in the NDP. These are the loss through development of the open countryside which serves to separate Abberley Common and Abberley village, and the potential harm to designated heritage assets that could arise. The site overall is disproportionate in relation to both village character and need. Given the position with regard to other sites,

windfalls and the indicative housing requirement, it is recommended that the site is not progressed further on its present boundaries.

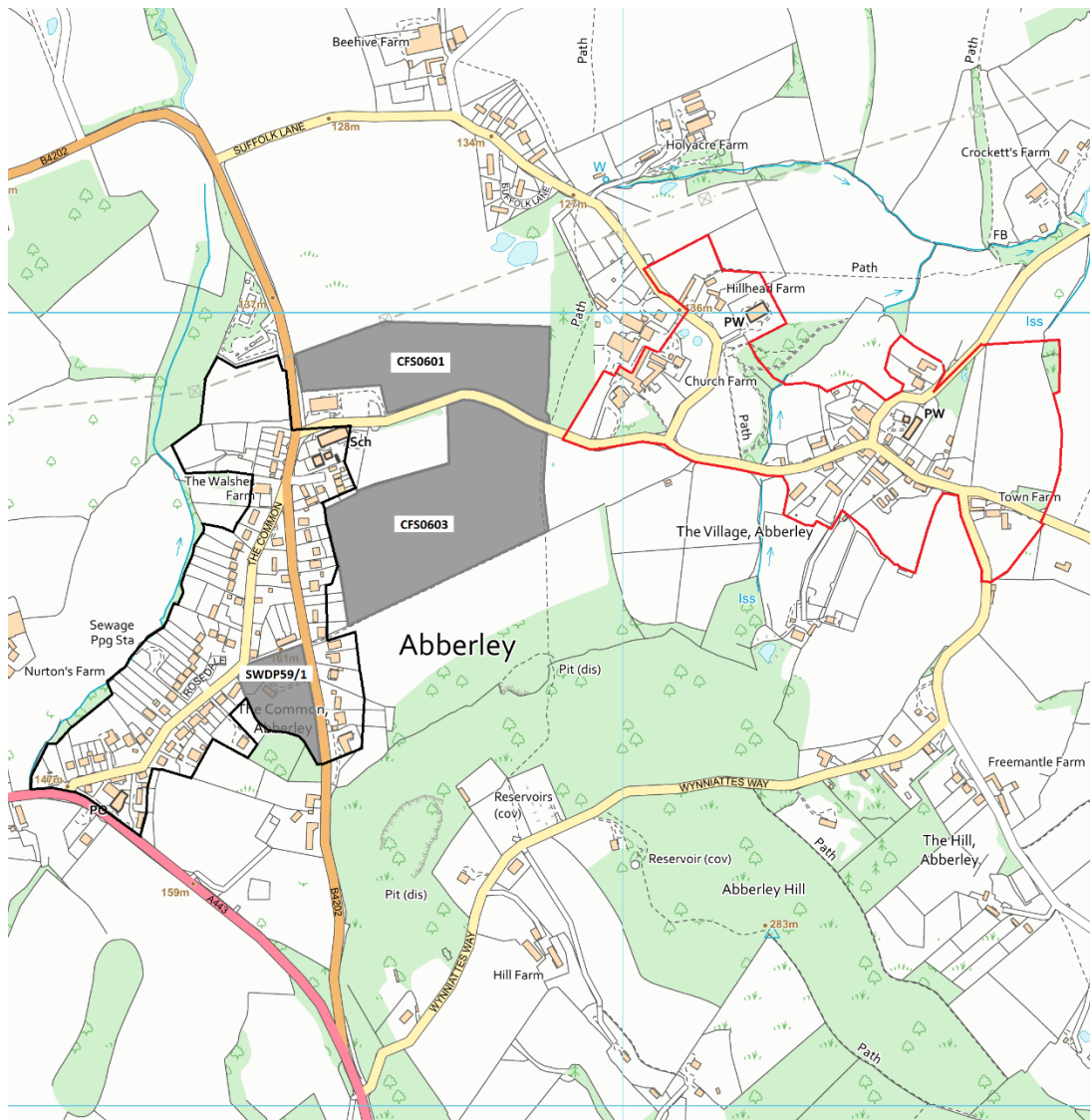
- 5.14 There is some scope for development in the west of the site, subject to a suitable access being available, which may also offer opportunity to enhance village facilities. If this option is to be pursued, development on the highway frontage eastwards in the direction of Abberley village and the Conservation Area should be minimised and care taken in creating a suitably landscaped village edge to the north and east.

Land to the rear of Clows Top Road, Abberley (CFS0603)

- 5.15 There are significant factors militating against the allocation of this site for residential development in the NDP. These are the loss through development of the open countryside which serves to separate Abberley Common and Abberley village, and the potential harm to designated heritage assets that could arise. The site lies on rising ground and extends to the rear of existing housing, and is disproportionate in relation to village character and need. Given the position with regard to other sites, windfalls and the indicative housing requirement, it is recommended that the site is not progressed further on its present boundaries.
- 5.16 The scope for a suitable smaller area for development to be delineated in the west of the overall site is limited. This is because of the 'backland' relationship to the rear of housing and the primary school, which restricts road access opportunities whilst continuing to giving rise to potential loss of residential amenity and to landscape and visual impacts associated with the rising elevated topography and presence of the public footpaths.

Land at the Orchard, Abberley Common (SWDP59/1)

- 5.17 This site is an unimplemented development plan allocation which is to be re-assessed in both the SWDPR and the preparation of the NDP. In the planning balance, regard should be had to the harm that development of the site will cause to settlement character. This arises through loss of open land characteristic of the evolution of the village and impact on views from Clows Top Road. This harm should be considered in plan-making alongside meeting housing needs and the progress of other sites. The allocation area is large in relation to the number of dwellings indicated, reflecting the limitations of the steeply-sloping topography towards The Common. If the site is to proceed in the NDP, the allocation policy should set out more detailed requirements as to areas for development (along Clows Top Road) and areas to be kept free from building (towards The Common, to reflect the topography). This will help reduce harm to settlement character and avoid the risk of over-bearing development positioned high above The Common road.



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Assessed site



SWDP development boundary



Conservation Area

Plan 2: Sites for assessment at Abberley Common

6. Conclusions and recommendations

- 6.1 The following conclusions and recommendations are drawn in respect of the approach to housing delivery to be taken in the Abberley NDP. They are contingent upon the assumptions made in this Report as to how best to proceed given the uncertainties posed by the SWDPR on matters such as planning strategy, windfall treatment and the future of unimplemented SWDP site allocations.

SWDPR and indicative housing requirement

- 6.2 The indicative housing requirement is 15 dwellings in total, 14 dwellings of which fall in the 2031-2041 period. The key word here is *indicative* and as the methodology states the figures involved are liable to change for a variety of reasons. The risk is that the NDP's approach to housing delivery could be found wanting as a result of such changes. To guard against this, it would be sensible to build some headroom into the overall approach. In any event, the indicative housing requirement is a minimum. The amount of any such headroom is for discussion with the Parish Council and will be influenced by the availability and suitability of potential sites.
- 6.3 The methodology offers the prospect of a Statement of Common Ground between qualifying bodies (in this case, the Parish Council) and the South Worcestershire Councils such that the number of dwellings already allocated in a Neighbourhood Development Plan would be taken into account when determining the number of dwellings to be allocated to that Neighbourhood Area via the SWDPR. This will help guard against the risk mentioned above. It would also serve to better inform the NDP as to emerging outcomes from the SWDPR. In this respect, the NDP should not be seen as a passive actor: if the NDP is seen to be taking a positive approach to housing delivery this is likely to be supported by the SWDPR team and in turn influence that emerging plan.
- 6.4 It is recommended that:
1. As a minimum, the NDP provides for an additional 15 dwellings over and above the level of growth already directed to the Neighbourhood Area in the SWDP.
 2. This provision incorporates proportionate headroom over and above the minimum requirement, to be determined in part by the availability and suitability of potential site allocations and having regard to public consultation.
 3. As part of continuing discussions, Abberley Parish Council takes up the offer of a Statement of Common Ground with the South Worcestershire Councils to confirm that sites allocated in the NDP will be taken into account when SWDPR housing allocation figures are being arrived at for the Neighbourhood Area.

Site allocation

- 6.5 Planned growth at Abberley in the SWDP totals 35 dwellings on three site allocations.¹⁹ At the time of writing, proposals for 26 dwellings at the Walshes Farm site and for 25 dwellings at the Apostles Oak site are subject to detailed planning consideration at reserved matters stage. The scale of development on these sites has been confirmed in their outline planning permissions. In both cases, this is notably more than the SWDP's indicative estimate of 15 and 14 dwellings respectively. Both sites are developable prospects and they should be confirmed as site allocations in the NDP for the permitted number of dwellings.
- 6.6 On this basis the SWDP growth expectations at Abberley Common have been more than satisfied. The committed 51 units on the two sites exceed the planned growth figure up to 2030 by 16. This 'uplift' can legitimately be set against the indicative housing requirement to 2041. This demonstrably meets the requirement, meaning there is no need to allocate further land. It also allows a reconsideration of the suitability of the third SWDP allocation, land at the Orchard, since this is no longer needed to meet the sought-after levels of growth overall.
- 6.7 Because none of the SWDP allocations have been implemented, they will be re-appraised in the current SHLAA exercise. It would be beneficial to both the SWDPR and NDP processes to harmonise the conclusions reached on these sites by the District and Parish Councils before the two plans progress to their later stages.

Windfall allowance

- 6.8 As indicated above, a realistic allowance may be made for future windfall sites, having regard to the SHLAA, historic windfall delivery rates and expected future trends.²⁰ Windfall sites to date have all been below the SHLAA minimum site size threshold; further sites are unlikely to be identified in future SHLAA exercises, and so will continue to come forward as windfalls. The historic rate is somewhat sporadic but shows an average of one site per annum over the 13-year period. It is reasonable to expect that windfall sites will continue to arise but it is recommended a conservative approach is taken. For example, future sites may be limited by a policy in the NDP to resist inappropriate development of residential gardens.
- 6.9 To reflect this approach, it is recommended that a windfall allowance be adopted which is equivalent to 66% of the present delivery rate. Over the period 2016-2041, this would be equivalent to 16 units, or to 7 units for the period 2030 to 2041.

¹⁹ There are no parish-specific windfall targets in the SWDP. However, the assumptions as to windfall delivery at district level are being met, satisfying this element of supply. The SWDP assumes 35 windfalls pa for Malvern sub area (ex. Worcester Wider Area); the latest Malvern Hills Five Year Housing Land Supply report for July 2018 indicates delivery of 33 units pa 2006-2018.

²⁰ NPPF paragraph 70.

Housing provision in the NDP

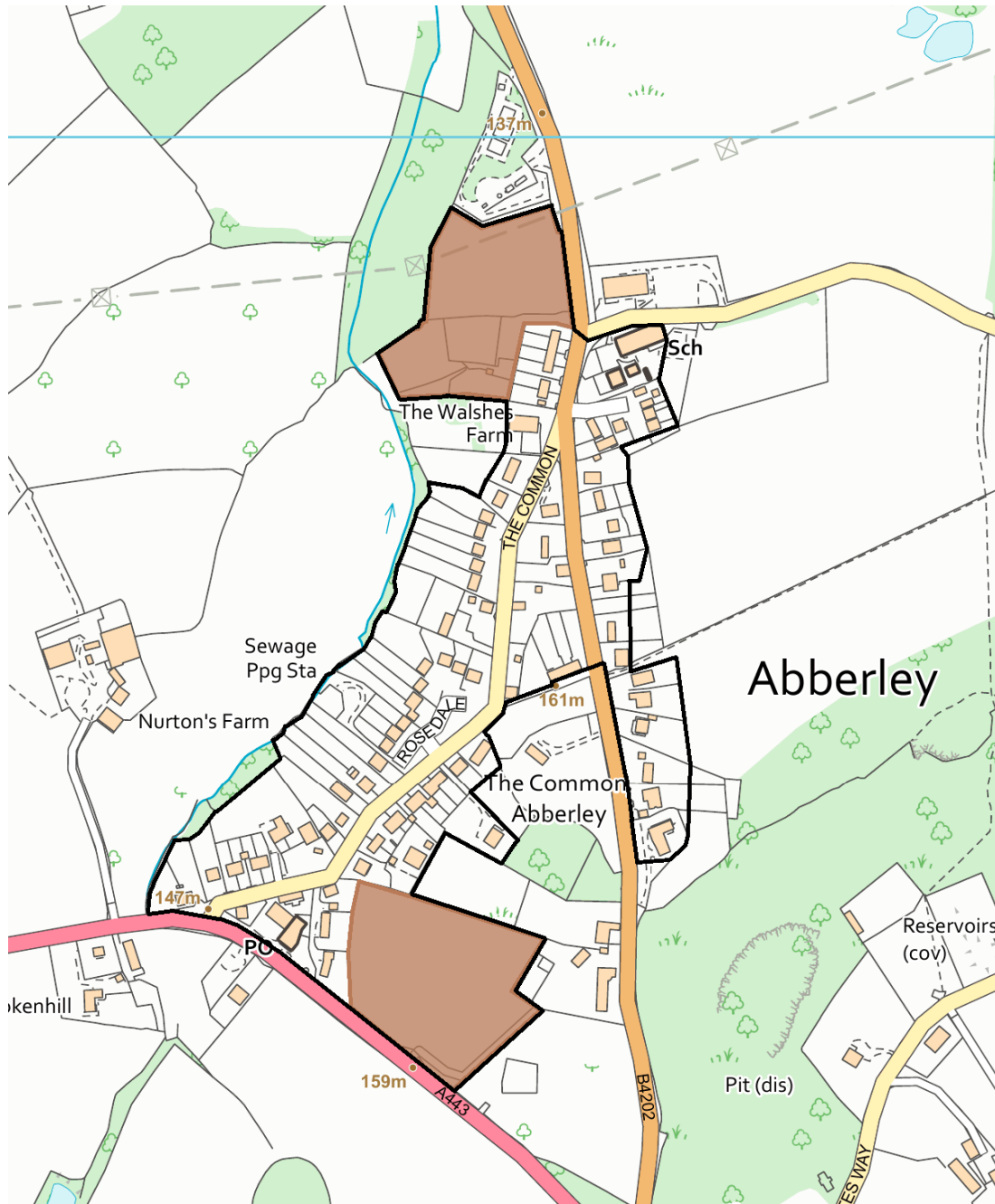
- 6.10 A recommended approach to housing delivery in the NDP is set out in Table 3. It is subject to other decisions arrived at in light of the site assessments. The approach is positive in that it demonstrates delivery of the planned SWDP growth at Abberley and meets the indicative housing requirement.
- 6.11 Table 3 makes no allowance for windfalls in the period up to 2030. These have already been 'counted' in the SWDP's housing need calculations (see para. 4.8). For the NDP itself, it will be appropriate to identify a windfall allowance for the remainder of the plan period, i.e. 15 units from 2019 to 2041, strengthening the position regarding housing delivery.

Housing requirement		NDP housing provision	
SWDP planned growth at Abberley Common up to 2030	35	Land at Walshes Farm (site allocation)	26
Indicative housing requirement 2021 to 2041	15	Land west of Apostles Oak Cottage (site allocation)	25
		Windfalls 2030 to 2041	7
Total	50		58

Table 3: NDP housing provision



Abberley Common development boundary

- 6.12 A revised development boundary for Abberley Common is set out below (Plan 3). It assumes that the land at the Orchard is no longer included as a site allocation, and that other Call for Sites opportunities are not progressed.



NORTH
Not to scale.

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-  Development boundary
-  Housing site allocation

Plan 3: Abberley Common development boundary and housing site allocations

Appendix A: Indicative housing requirement

Indicative housing requirement for Abberley Neighbourhood Area, calculated using the SWDP methodology which was endorsed at the Joint Advisory Panel on 26 February 2019.

Base information

Abberley Parish population in 2011: 836

Abberley's population is **0.82%** of the total population of rural parishes in South Worcestershire (101,794 in 2011).

2021-2030

IHR is 0.82% of the additional 58 dwellings to be distributed to SW rural parishes = **0.47 dwelling**.

2031- 2041

IHR is 0.82% of the additional 1,761 dwellings to be distributed to SW rural parishes = **14.4 dwellings**.

Appendix B: Windfalls

Net completions on windfall sites in the Neighbourhood Area, 2006-7 to date:

Year	Address	No.
2006-7	Pool House Farm, Studd Lane, Abberley	3
2007-8	Elm Point, Apostles Oak, Abberley	1
2008-9	Field Farm, Pensax, Abberley	1
	Barn 4, Pool House Farm, Studd Lane, Abberley	1
2009-10	Elm Point, Apostles Oak, Abberley	1
2016-17	Land adj 46 Apple Tree Cottage, The Common, Abberley	1
2018-19	Cherry Ash, Bank Lane, Abberley (certificate of lawfulness)	1
Total		9

No completions recorded for 2010-11 to 2015-16 inclusive, or for 2017-18.

Completion data taken from <https://www.malvern hills.gov.uk/housing-land-monitoring>

Other commitments:

App ref	Address	No.
10/00554/OUT	Manchester House, Abberley*	3
15/00488/PDU	Lower Crudlend Farm, Stanford Bridge (prior approval)**	1

* also see reserved matters permission 14/00717/REM granted 8/4/2015. It is understood that footings were dug before the lapse of this permission and the permission is therefore commenced and remains live.

** no information on commencement or completion.

Appendix C: Site assessment schedules

Site Assessment: Land east of Clows Top Road, Abberley

Site information	
Reference	CFS0601 from 2018 SWDPR Call for Sites.
Name/address	Land east of Clows Top Road, Abberley.
Area (hectares)	2.65.
Existing use	Agriculture.
Previously developed?	No.
Adjacent land uses	Farmland to N and E. Village hall to SW. Adjoins B4202 Clows Top Road to W and adopted highway to S.
Ownership	Single.

Site features	
Boundaries	Hedgerow/post and wire to highway/village hall to W and S. N and E boundaries not marked on ground.
Other site features / constraints	N boundary in part marked by overhead power lines on pylons.
Topography	Gentle fall to N from highway.

Accessibility / infrastructure	
Highway access	From highway to S.
Public right of way?	None on site. Public footpath 516C runs to the E, outside the site.
Other infrastructure / services	No information but expected to be capable of connection to normal village services.

SWDP, SHLAA and planning history	
SWDP policy summary	None relevant.
2015 SHLAA reference	None.
Planning history	None relevant.

Heritage assets	
Conservation Area	None on site. Abberley Conservation Area lies to the E (27m at closest point).
Listed buildings	None on site. Tump House to E is grade II listed.
SAM	None.
Other heritage	None.

Environmental information	
Landscape type	Timbered Plateau Farmlands.
TPO	None.
Biodiversity sites and habitats	None.
Flood risk	Flood Zone 1.
Other	None known.

Site assessment	
Suitability	<p>This is a large site forming part of a more extensive field which extends to Suffolk Lane in the N. It is well-located in respect of the primary school and the village hall and development could potentially enable enhancement of these village facilities. The main limiting factors are its overall size relative to need, the lack of existing boundaries to the N and E, the presence of designated heritage assets nearby (Abberley Conservation Area and Tump House), and its position in the countryside gap which separates Abberley Common and Abberley village. In its present configuration, development of the site would be harmful to overall village and landscape character by leading to the significant coalescence of these two settlements. It would also risk potential harm to the significance of designated heritage assets though development in their open rural setting, contrary to national policy.</p> <p>These factors could be addressed by restricting development to the western part of the site, so as to maximise the village links whilst avoiding significant loss of open road frontage towards the east. The principle of extending the village this far north has already been ceded through the allocation and grant of planning permission on the Walshes Farm site. Development could be accessed from the highway to the south, perhaps in conjunction with a re-modelled village hall access.</p>
Availability	Yes, as per the Call for Sites.
Achievability	In line with the 2015 SHLAA assessment of similar sites at Abberley the financial viability for housing is expected to be high.
Development potential	The gross area of the site, 2.65 ha., could accommodate upwards of 66 dwellings @ 25 dph if fully developed.
Concluding assessment	<p>The loss through development of the open countryside which serves to separate Abberley Common and Abberley village, and the potential harm to designated heritage assets that could arise are significant factors militating against the allocation of this site for residential development in the NDP. The site overall is disproportionate in relation to village character and need. Given the position with regard to other sites, windfalls and the indicative housing requirement, it is recommended that the site is not progressed further on its present boundaries.</p> <p>There is some scope for development in the west of the site, subject to a suitable access being available, which may also offer opportunity to enhance village facilities. If this option is to be pursued, development on the highway frontage eastwards in the direction of Abberley village should be minimised and care taken in creating a suitably landscaped village edge to the north and east.</p>

Site Assessment: Land to the rear of Clows Top Road, Abberley

Site information	
Reference	CFS0603 from 2018 SWDPR Call for Sites.
Name/address	Land to the rear of Clows Top Road, Abberley.
Area (hectares)	4.52.
Existing use	Agriculture.
Previously developed?	No.
Adjacent land uses	Farmland to E and S. Housing to W and school to N. Adjoins adopted highway to N.
Ownership	Single.

Site features	
Boundaries	Hedgerow, post and wire fence, open boundary, variety of residential boundary treatments to W.
Other site features / constraints	Footway link to Clows Top Road to the W.
Topography	Gentle fall to N.

Accessibility / infrastructure	
Highway access	From highway to N.
Public right of way?	Public footpaths 517B and 521B run along the E and S boundaries respectively.
Other infrastructure / services	No information but expected to be capable of connection to normal village services.

SWDP, SHLAA and planning history	
SWDP policy summary	None relevant.
2015 SHLAA reference	None.
Planning history	None relevant.

Heritage assets	
Conservation Area	None on site. Abberley Conservation Area lies to the E (23m at closest point).
Listed buildings	None on site. Tump House to E is grade II listed.
SAM	None.
Other heritage	None.

Environmental information	
Landscape type	Timbered Plateau Farmlands.
TPO	None.
Biodiversity sites and habitats	None.
Flood risk	Flood Zone 1.
Other	None known.

Site assessment	
Suitability	<p>This is a large field which wraps around the village primary school, extending from the rear of housing along Clows Top Road to the Abberley village road. It is well-located in respect of the village hall as well as the school, and has good connectivity to the village to the west through the existing footpath link to Clows Top Road. However, there are a number of factors limiting its suitability: its overall size relative to need, the presence of designated heritage assets to the east (Abberley Conservation Area and Tump House), its position in the countryside gap which separates Abberley Common and Abberley village, its situation on rising land on the lower slopes of Abberley Hill, the lack of notable boundaries to the south and east, loss of amenity for the users of the public footpaths which run along these boundaries, and loss of residential amenity for properties on Clows Top Road overlooking the site.</p> <p>As with CFS0601 to the north, development of the overall site would be harmful to village and landscape character in that it would lead to the significant coalescence of these two settlements as well as to encroachment onto the lower slopes of Abberley Hill. It would also risk potential harm to the significance of designated heritage assets though development in their open rural setting, contrary to national policy. There is also the potential for loss of residential amenity arising from development to the rear of housing along Clows Top Road. The countryside experience afforded to users of the public footpaths along the site's boundaries would also be adversely affected.</p> <p>There is limited scope for addressing these potential impacts and harm through a partial site release, largely because of the rising and elevated topography and the presence of nearby housing.</p>
Availability	Yes, as per the Call for Sites.
Achievability	In line with the 2015 SHLAA assessment of similar sites at Abberley the financial viability for housing is expected to be high.
Development potential	The gross area of the site, 4.52 ha., could accommodate upwards of 113 dwellings @ 25 dph if fully developed.
Concluding assessment	<p>The loss through development of the open countryside which serves to separate Abberley Common and Abberley village, and the potential harm to designated heritage assets that could arise are significant factors militating against the allocation of this site for residential development in the NDP. It also lies on rising ground and extends to the rear of existing housing, and is disproportionate in relation to village character and need. Given the position with regard to other sites, windfalls and the indicative housing requirement, it is recommended that the site is not progressed further on its present boundaries.</p> <p>The scope for a suitable smaller area for development to be delineated in the west of the overall site is limited. This is because of the 'backland' relationship to the rear of housing and the primary school, which restricts road access opportunities whilst continuing to giving rise to potential loss of residential amenity and to landscape and visual impacts associated with the rising topography and presence of the public footpaths.</p>

Site Assessment: Land at the Orchard, Abberley Common

Site information	
Reference	SWDP59/1 from SWDP.
Name/address	Land at the Orchard, Abberley Common.
Area (hectares)	0.85.
Existing use	Dwelling (vacant) and garden, former orchard.
Previously developed?	Yes in part (dwelling only, excludes garden, orchard areas).
Adjacent land uses	Site lies between The Common and B4202 Clows Top Road, with housing opposite; housing also to N. Woodland to S.
Ownership	Single.

Site features	
Boundaries	Hedgerow.
Other site features / constraints	Site crossed by overhead power lines.
Topography	Steeply sloping site from the NE/E Clows Top Road to The Common and SW.

Accessibility / infrastructure	
Highway access	From B4202 Clows Top Road.
Public right of way?	Public footpath 520B runs on northern boundary, outside site.
Other infrastructure / services	No information but expected to be capable of connection to normal village services. 2015 SHLAA reports infrastructure constraints as low.

SWDP, SHLAA and planning history	
SWDP policy summary	Allocated for residential development under SWDP 59 (indicative number of dwellings: 6. A background paper to the SWDP (December 2012) comments: "Sloping site but well related to village and lends itself to modest form of development on part of site fronting Clows Top Road. Site adj to Special Wildlife Site. Reduced site density required due to extreme topography of site on lower section fronting The Common and tapering of site to south. Highway requirements to serve only private drive would severely restrict density to serve a maximum of 6 dwellings subject to achieving the required gradient, visibility splays and storm water disposal arrangements.".
2015 SHLAA reference	MHAB01; reported as a "useful site – quite steep so design issues/lower density".
Planning history	None relevant.

Heritage assets	
Conservation Area	Site is not within or adjacent to a Conservation Area.
Listed buildings	No listed buildings on site or adjacent.
SAM	No Scheduled Ancient Monuments on site or adjacent.
Other heritage	None.

Environmental information	
Landscape type	Timbered Plateau Farmlands.
TPO	None.

Biodiversity sites and habitats	There are Priority Habitat Inventory sites to the immediate south (deciduous woodland) with traditional orchard beyond.
Flood risk	Flood Zone 1 (low probability).
Other	None known.

Site assessment	
Suitability	This site is a development plan allocation which attests to its suitability. The SWDP background paper makes clear that only limited development along the Clows Top Road frontage is envisaged, accessed by a private drive, although this expectation will be hard to deliver as it is not explicitly written into the SWDP policy. Development of the site will impact on settlement character. Abberley Common has a distinctive linear pattern of development, with older and more recent development generally fronting the road. This is typical of settlements which have evolved around common land (whilst development in depth will be a feature of current proposals to north and south of the village, these are outside the established areas of the settlement). The site is centrally-located. It contributes to the distinctive character of the village and demonstrates the historical evolution of the settlement, including through its former orchard use. There are wide-ranging views across the site and village to the countryside beyond from Clows Top Road which would be lost or restricted by development.
Availability	The site is understood to be available as per the 2015 SHLAA – there has been no more recent confirmation of landowner intention.
Achievability	The 2015 SHLAA indicates the site has high financial viability for housing. Physical constraints costs are medium and infrastructure constraints low.
Development potential	6 dwellings as per the SWDP allocation. This reflects the site's topographical constraints with development limited to Clows Top Road frontage.
Concluding assessment	This site is an unimplemented development plan allocation which stands for re-assessment in both the SWDPR and the preparation of the NDP. In the planning balance, regard should be had to the harm that development of the site will cause to settlement character. This arises through loss of open land characteristic of the evolution of the village and impact on views from Clows Top Road. This harm should be considered in plan-making alongside meeting housing needs and the progress of other sites. It is noted that the allocation area is large in relation to the number of dwellings indicated, reflecting the limitations of the steeply-sloping topography towards The Common. If the site is to proceed in the NDP, the allocation policy should set out more detailed requirements as to areas for development (along Clows Top Road) and areas to be kept free from building (towards The Common, to reflect the topography). This will help reduce harm to settlement character and avoid the risk of over-bearing development positioned high above The Common road.