

16th December 2019

South Worcestershire Development Plan
Wychavon Civic Centre
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By email only to contact@swdevelopmentplan.org

Dear Sir / Madam

SOUTH WORCESTERSHIRE DEVELOPMENT PLAN – PREFERRED OPTIONS CONSULTATION

Thank you for consulting the Cotswolds Conservation Board on the Preferred Options consultation for the South Worcestershire Development Plan.

The Board is pleased to see that the draft Plan provides many policies that will help to conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB).

However, the Board considers that there are a number of areas where the Plan can be improved to ensure that the local authorities fulfil their statutory duty to have regard to the purpose of AONB designation and fulfil the requirements of national planning policy with regards to AONBs.

In particular, the Board recommends that the proposed housing allocations at Broadway (including the increased housing provision at Station Road) and Mitton should be withdrawn. In summary, the over-arching reasons for the Board's objection to the Broadway allocations are as follows:

- The Preferred Options consultation documents do not provide convincing evidence of housing need specific to Broadway, in particular affordable housing need. In the context of a settlement that overlaps with the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) this makes the allocations unsound.
- Housing development that has occurred since 2011, together with existing commitments and allocations, has already increased the number of dwellings in Broadway by nearly 29% since the 2011 census.

The main reasons for the Board's objection to the Mitton allocation are the potential impact on the tranquillity of the Cotswolds AONB, given the likely increase in traffic through the AONB, and the potential adverse landscape and visual impacts in relation to the AONB.

The Board also recommends that the policies relating to affordable housing and Rural Exception Sites should be made more stringent in the AONBs, in line with existing best practice for protected landscapes.

The Board's full recommendations – covering a number of issues - are provided in Annex 1 below.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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Yours faithfully,

A handwritten signature in cursive script that reads "John Mills". The signature is written in black ink and features a long, sweeping underline that extends to the right and then curves back under the name.

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. SUPPORTING INFORMATION FOR THE RESPONSE OF THE COTSWOLDS CONSERVATION BOARD TO THE SOUTH WORCESTERSHIRE DEVELOPMENT PLAN PREFERRED OPTIONS CONSULTATION

SWDPR 2: The Spatial Development Strategy and Associated Settlement Hierarchy

Recommendation: That the wording of Policy SWDPR2, part iii is changed to:
iii. Safeguard the special qualities and features of the Areas of Outstanding Natural Beauty and ensure that, wherever possible, development conserves and enhances them.

Reason: The amended wording reflects the language of the AONB Management Plans and the purposes of AONB designation.

SWDPR 3: Strategic Transport Links Managing Travel Demand

Recommendation: That the wording of Policy SWDPR 3, is changed as follows:

C. Development proposals should be clearly supportive of the design criteria and principles set out in Manual for Streets (Part 1 and 2), Worcestershire LTP4 and Worcestershire County Council's Streetscape Design Guide. In the Cotswolds and Malvern Hills AONBs highway design guidance produced for these areas should also be utilised.

F. Development proposals within and adjacent to the Cotswolds and Malvern Hills AONBs should not give rise to significant traffic increases and associated effects on tranquillity and enjoyment.

K. Financial contributions from development towards transport infrastructure and/or compensation will be secured either through the Community Infrastructure Levy charging schedule or developer contributions, as appropriate.

Reason: Reference to local guidance specific to the AONBs will help ensure that transport related development does not impact on the nationally designated landscapes. For example, relevant policies are provided in the AONB Management Plans, for example, Policy CE10 (Development and Transport – Principles) in the Cotswolds AONB Management Plan. The Board's Tranquillity Position Statement is also particularly relevant as it provides guidelines on the scale at which increases in traffic should require an Environmental Impact Assessment. The Board believes that any financial contributions/compensation payable resulting from effects of increased development and traffic should also include payments for relevant works in the AONB.

12 Economic Growth

Policies for economic growth e.g. 12.28 etc appear to support intensification of food production activities associated with e.g. horticulture. This is likely to include (larger) areas of fleece, polythene, polytunnels, glass houses etc which can be every visible from highly valued viewpoints in the Cotswolds and Malvern Hills AONBs and have a detrimental impact on the setting of these national landscapes and on how people experience them. It is important that this fact and these views are recognised in decision making and that sites are very carefully selected and designed with longer range views in mind.

SWDPR 11: Employment in Rural Areas

Recommendation: That the wording of Policy SWDPR 11, is changed as follows:

B ii. The scale, layout and detailed design of activities associated with the proposed development is appropriate to the rural character of the area;

Reason: Issues such as layout and design are just as important as scale when striving for appropriate development in rural areas.

SWDPR 12: Effective Use of Land

Recommendation: That the wording of Policy SWDPR 12, is changed as follows:

v. Where urban extensions and other large developments abut open land or sensitive locations such as Areas of Outstanding Natural Beauty, conservation areas, listed buildings, areas of archaeological interest or ecological / biodiversity value, their design should reflect the sensitivity of those areas. Development densities immediately adjacent to such areas should be adjusted downwards as appropriate to ensure that impact on them is minimised, whilst maintaining the overall average density of the site.

Reason: AONBs should also be recognised as precious and sensitive areas in this context.

SWDPR 14: Meeting Affordable Housing Needs

Recommendation: That the level of on-site affordable housing provision required AONBs should be 50% for developments of two or more dwellings. In AONBs, priority should be given to the provision of affordable housing in perpetuity.

Reason: This reflects viable best practice for protected landscapes, as demonstrated in the Arnside and Silverdale AONB Development Plan Document (DPD), which was adopted in March 2019. Policy AS03 (Housing Provision) of the DPD states:

- Proposals for new housing development of two or more properties will be supported where they deliver no less than 50% affordable housing.

50% affordable housing provision is standard practice in many protected landscapes.

A higher level of affordable housing provision is appropriate in AONBs because:

- (i) There is often a premium on house prices in AONBs and other protected landscapes. Having a higher level of affordable housing provision in these landscapes, especially housing that is affordable in perpetuity, helps to provide housing for those people who live and work in these areas but cannot afford market housing prices.
- (ii) The scale and extent of development should be limited in AONBs and other protected landscapes. Having a higher level of affordable housing provision reduces the amount of market housing that is needed to cross-subsidise the affordable housing.

SWDPR 18: Rural Exception Sites

Recommendation: That the following sentence should be added to the start of paragraph B.

- Rural Exception Sites will be required to provide 100% housing except in exceptional circumstances.

Recommendation: That the wording of Policy SWDPR 18 is expanded through the addition of a part iv. to A as follows:

A iv. A Landscape Sensitivity and Capacity Assessment (LSCA) has demonstrated that capacity exists for the proposed housing on the selected site.

Reason:

In some part of the Cotswolds AONB, Rural Exception Sites (RES) have been granted planning permission when they only provide 51% affordable housing. This is the level of affordable housing provision that the Board would advocate for market-led housing. Such low levels of affordable housing provision in RES undermines the purpose for which such sites were established, undermines the justification of permitting such development on sites that wouldn't normally be granted planning permissions and results in excessive amounts of market housing. Many protected landscapes require 100% affordable housing – the same standard should be applied in the AONBs.

LSCA is now a recognised feature of landscape-led development in AONBs. The inclusion of the proposed wording (in AONBs only if considered appropriate) will be consistent with the AONB Management Plans and will therefore help to ensure that the Local Development Plan delivers against these documents.

SWDPR 21: Dwellings for Rural Workers

Recommendation: That the wording of Policy SWDPR 21, is expanded through the addition of a part vi. to A as follows:

A vi the form, design, materials and colour of the dwelling make a positive contribution to landscape character and its rural context.

Reason: Whilst accepting the need for dwellings for rural workers it is also appropriate to ensure that these are properly integrated in the rural setting.

SWDPR 25: Design

Recommendation: That the wording of Policy SWDPR 25 is amended as follows:

iii. Settings of the City, Towns and Villages and rural areas

Design proposals should ensure that the prominent and valued views, vistas and skylines of Worcester city, the towns and other settlements and of rural areas are maintained and safeguarded, particularly where they relate to heritage assets, existing landmark buildings, and 'gateway' sites. Development at the urban edges should respect the rural setting and valued views. The distinct identity and character of rural settlements should be safeguarded.

vii. Detailed Design, Materials and Landscaping

The detailing and materials and colour of development should be of high quality and appropriate to its context and local distinctiveness. Design should have regard to sustainable construction approaches and ensure adaptability to changes in the climate. Development

should provide high quality hard and soft landscaping that is included as an integral part of developments design and include arrangements for long-term management.

It is also suggested that a new clause is added to this policy as follows:

xii Areas of Outstanding Natural Beauty

In the Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty proposals for new development should be in accordance with guidance produced by the Conservation Board or AONB Partnership, respectively.

Reason: Many rural areas and views are as valued as those of the towns and villages. Amended wording of point iii will set the scene for the growing number of NDPs that contain policies safeguarding key views. It is increasingly recognised that colour is a key part of ensuring appropriate development.

SWDPR 27: The Cotswolds and Malvern Hills Areas of Outstanding Natural Beauty (AONB)

Recommendation: That the wording of Policy SWDPR 27 is amended as follows:

B. Minor development proposals within the AONB will be supported provided that it can be demonstrated that they will conserve and enhance the natural beauty of the AONB, including its special qualities, landscape and scenic quality, natural heritage, cultural heritage and relative tranquillity.

C. Development proposals within the AONB must demonstrate that they will conserve and enhance the natural beauty of the AONB.

D. Development proposals should be consistent with and help to implement the latest published AONB Management Plans and their associated guidance.

AONB Setting

E. Development proposals in the setting of an AONB which could have a detrimental effect on the purpose of AONB designation will have to submit an assessment of landscape and visual effects and demonstrate, including through siting and design, that any such effects could be rendered acceptable. Development in the setting of the AONBs should be in accordance with good practice guidance produced by the Conservation Board or AONB Partnership.

Reason: Focussing on 'conserving and enhancing natural beauty' will be more consistent with the purpose of AONB designation and the purposes of the Cotswolds Conservation Board. Aspects such as special qualities, tranquillity, etc, are all components of natural beauty.

SWDPR 29: Landscape Character

Recommendation: That the wording of Policy SWDPR 27 is amended as follows:

C. The Landscape and Visual Impact Assessment should include proposals to protect and conserve landscape character including key landscape features and elements and, where appropriate, enhance landscape quality.

Recommendation: That the reasoned justification to Policy SWDPR 27 is amended as follows:

14.65 SWDPR 27 sets out the overarching policy regarding development affecting the Areas of Outstanding Natural Beauty but in the interests of clarity development proposals and their associated landscaping schemes must take account of landscape character assessments and landscape strategies and guidelines in these areas.

Reason: Suggested word changes to the policy make it more consistent with the terminology employed in landscape character assessments. Suggested changes to the reasoned justification are to ensure that more up-to-date work on LCA and related strategies produced by the AONBs are also factored into decision making.

SWDPR 30: Electronic Communications

Recommendation: That the reasoned justification to Policy SWDPR 30 is amended as follows:

15.13 The siting and appearance of the proposed apparatus and associated structures should seek to minimise the impact on the visual amenity, character, landscape or appearance of the surrounding area, particularly if it is proposed in a conservation area or AONB. All geospatial considerations can be considered through Government guidance.

Reason: As nationally designated landscapes AONBs should be mentioned in this context.

SWDPR 31: Renewable and Low Carbon Energy

Recommendation: That the reasoned justification to Policy SWDPR 31 is amended as follows:

15.58 Whilst it is important that renewable and low carbon energy development is encouraged, it is also important that it is appropriately located and designed. The integration of stand-alone renewable and low carbon energy proposals into south Worcestershire's varied landscapes requires careful consideration. Statutorily protected areas need to be protected from inappropriate development. The purposes of, and reasons for, such protective designations will vary considerably between sites and may not be in conflict with particular forms or scales of renewable and low carbon energy development, indeed, schemes which support the management of core elements of the landscape may be particularly welcomed in certain areas such as AONBs. The key test in assessing proposals will be the extent to which they might affect the special qualities and the integrity of the designation.

Reason: To flag up that renewable and low carbon energy schemes may be positively welcomed in certain area.

SWDPR 35: Amenity

Lighting

Recommendation: That the reasoned justification to Policy SWDPR 35 is amended as follows:

15.109 Lighting should be restricted to the safe minimum required for the development. For public roads and footways lighting should always meet the local highway authority required standards. Lighting assessments will be required including details of any proposed mitigation to reduce the impact on neighbouring land uses and any sensitive environmental receptors where an adverse impact is identified. In the Malvern Hills AONB and Cotswolds AONB the darkness of the night skies has been identified as a special quality of these nationally designated landscapes. The emphasis here should be on avoidance of light pollution, including through refusing new external lighting unless essential and adherence to best practice design. Reference should be made to guidance on external lighting and dark skies produced for these areas.

Reason: To reflect the importance of dark skies above the AONBs and the need for development which seeks to safeguard these special qualities. Adherence to local guidance can help to achieve this.

SWDPR 48: Equestrian Development

Recommendation: That the wording of Policy SWDPR 48 be expanded with a new clause C as follows:

C. In the Cotswolds and Malvern Hills AONBs a management plan will be submitted with proposals for development setting out how the land will be conserved and enhanced under equestrian use. This management plan should be informed by relevant guidance including that produced by the Conservation Board or AONB Partnership. Implementation of this management plan will be a condition of any planning permission granted.

Reason: Much of the damage associated with equestrian use comes after an application for change of use and development on the ground, e.g. stabling, has been granted. For example, via the subdivision of land through fencing, overgrazing etc. The wording proposed would require that such plans are submitted and scrutinised in advance. No mention is made of the length or detail required in a management plan which should allow for very short, simple plans to be submitted for smaller developments.

SWDPR 54: Wychavon Housing Allocations

Recommendation: The Board recommends that they should be withdrawn:

- the proposed new housing allocation of 62 dwellings in Broadway (SWDP NEW 72 / CFS1064: Land off Leamington Road);
- the 35 dwellings that have been added to the reallocated site adjacent to Station Road in Broadway (SWDP REALLOCATE 32), which increases the total number of dwellings on this site from 65 to 100;
- the proposed 1,000 dwellings at Mitton (SWDP NEW EDGE 3), particularly the 500 dwellings that are over and above the 500 required by the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy.

Reason

In summary, the over-arching reasons for the Board's objection to the Broadway allocations are as follows:

- The Preferred Options consultation documents do not provide convincing evidence of housing need specific to Broadway, in particular affordable housing need. In the

context of a settlement that overlaps with the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) this makes the allocations unsound.

- Housing development that has occurred since 2011, together with existing commitments and allocations, has already increased the number of dwellings in Broadway by nearly 29% since the 2011 census.

The main reasons for the Board's objection to the Mitton allocation are the potential impact on the tranquillity of the Cotswolds AONB, given the likely increase in traffic through the AONB, and the potential adverse landscape and visual impacts in relation to the AONB.

Over-arching concerns

Lack of convincing evidence of need

The Preferred Options consultation documents do not provide convincing evidence of housing need specific to Broadway, in particular affordable housing need. In the context of a settlement that overlaps with the boundary of the Cotswolds Area of Outstanding Natural Beauty (AONB) this makes the allocations unsound. The Board has previously raised this issue in its response to the Issues & Options consultation but it does not appear to have been addressed in the current Preferred Options consultation.

The National Planning Policy Framework (NPPF), in particular paragraph 11 and footnote 6, makes it clear that the presumption that planning authorities should seek to meet the full Objectively Assessed Housing Need in their area does not apply in AONBs. Instead, the main focus for new housing in AONBs should be on meeting affordable housing requirements, with this housing remaining affordable in the longer term.¹

Policy CE12 of the Cotswolds AONB Management Plan 2018-2023 specifies that:

- *Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB. Priority should be given to the provision of affordable housing ...*

Lack of evidence of the housing need arising from within the Cotswolds AONB (including the needs of individual settlements within the AONB) was one of the key reasons for all of the proposed housing allocations in the Rural Service Centres of Burford and Charlbury (and the neighbouring villages) being removed from the West Oxfordshire Local Plan, which was adopted on 27th September 2018. Maintaining these allocations without this evidence base would have made the plan unsound. The Planning Inspector's report for the West Oxfordshire Local Plan stated that:

- *There is little case for the plan to provide for more [dwellings] than the already completed / committed 774 dwellings in the Burford–Charlbury sub-area (either the site allocations or a reliance on future windfalls) simply to ensure that the district-wide housing needs are met. Moreover, in the absence of a specific housing need figure for the sub-area, it is not possible to identify that new dwellings, over and above existing completions and commitments, are as a matter of principle, necessary specifically in the context of the AONB or the Burford–Charlbury sub-area' ... 'the allocation in the plan of housing sites, and the reliance on additional windfall housing development, in the Burford – Charlbury area, over and above existing completions and commitments, would not be sound'.*

¹ This focus on affordable housing is set out in the 'UK Government Vision and Circular 2010 – English National Parks and the Broads' (paragraph 78, page 20). Given that AONBs have the same planning status as national parks, the same principle of focusing on affordable housing should apply equally in AONBs.

It is also worth noting that the adopted West Oxfordshire Local Plan sets additional criteria relating to housing developments in the Cotswolds AONB, including:

- *within the Cotswolds AONB, windfall housing proposals on undeveloped land adjoining built up areas will be particularly closely scrutinised and will only be supported where there is convincing evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement, for example through a rural exception site (paragraph 5.39).*

The Board strongly supports the approach taken by the planning inspector for the West Oxfordshire Local Plan and the policies and supporting text of the adopted Plan.

Following this approach, it is clear that housing need surveys should be a key factor when deciding the amount of housing to allocate in the AONBs in the South Worcestershire Development Plan. Unfortunately, email communication from Wychavon District Council to the Board has explicitly stated that housing need surveys '*are not a factor in how much we allocate through a local plan review*'.

Therefore, it is clear that the approach currently being taken in the South Worcestershire Development Plan for housing allocations in the AONBs is unsound.

The Board recommends that the results of the Broadway housing needs survey should be a key consideration when deciding how many dwellings to allocate in Broadway.

Choice based lettings (CBL) systems, such as Home Choice Plus, should not be treated as a measure of housing need. Although CBL provides some indication of potential take-up of affordable housing, it allows for double, or even triple, counting of housing need. Also, CBL data is not always validated until a household actual makes a 'bid' for available housing

Scale of development

The NPPF (paragraph 172) explicitly states that the scale and extent of development in AONBs should be limited. The Government's Planning Practice Guidance re-iterates this and adds that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*'.

In Broadway, housing numbers have already increased considerably since the 2011 census. In 2011, there were 1,718 dwellings in Broadway. Since then, 242 dwellings have been built and a further 254 are committed (through planning permissions that have not yet commenced and additional allocations from the adopted local plan), totalling 496 additional dwellings. This equates to an increase in the number of dwellings of 29%. The further allocations proposed in the Preferred Options consultation (100 dwellings), would increase this growth to 35%.

29% growth in less than 10 years is already excessive for a settlement in an AONB where the scale and extent of development is supposed to be limited. The proposed additional allocations, of 100 dwellings, would make this inappropriate scale of growth even worse.

Site specific concerns

SWDP NEW 72 / CFS1064: Land off Leamington Road - 62 dwellings off Leamington Road

It has been brought to the Board's attention that the owner of this site is not selling the land, did not submit the proposed allocation, and does not want it developed. As such, it is highly unlikely to be deliverable.

The Cotswolds AONB Landscape and Visual Sensitivity Study (LVSS), commissioned by Malvern Hills District Council, indicates that the land cover parcel (LCP), which this allocation lies within, has medium 'housing sensitivity' and that it has 'housing capacity'. This is based on the fact that the study ranks the landscape susceptibility / sensitivity, visual susceptibility and overall sensitivity of this LCP as being medium.

Whilst the Board agrees that the proposed site is less sensitive than other LCPs around Broadway, this does not necessarily mean that the sensitivity is not high. For example, the LVSS states, in paragraph 3.4, that the site does not reflect or significantly adversely affect the special qualities of the AONB. However, one of the AONB's special qualities is the views to the Cotswold escarpment. The footpaths around the site provide such views, which would be obscured by the proposed housing. Another of the special qualities is '*an accessible landscape for quiet recreation*' – the footpaths around the site form part of this special quality and the 'quiet recreation' that they provide would be adversely affected by the proposed housing. As such, the site currently reflects some of the special qualities of the AONB and would be adversely affected by the proposed allocation.

The Cotswolds AONB Landscape Character Assessment (LCA) identifies 19 different landscape character types (LCTs) in the Cotswolds AONB. The proposed allocation would be located in LCT 19 (Unwooded Vale). The LCA states that the landscape of LCT19 '*is typical of the vale and the gently undulating landform is cloaked in a patchwork of fields, boundaries being formed by neat, well-maintained hedgerows*'. The Cotswolds AONB Landscape Strategy and Guidelines (LSG) identifies this agrarian landscape of pastures and arable fields, together with the well maintained hedgerows, as being key features of this LCT. The site is representative of these characteristics of LCT19. Although it is proposed that most of the hedgerows would be maintained, the field itself would be lost to development, leading to the further erosion of the landscape character and natural beauty of this part of the AONB.

SWDP REALLOCATE 32 (Land adjacent to Station Road)

The 65 dwellings that were already allocated for this site in the adopted South Worcestershire Development Plan already represented a large allocation in an AONB settlement (albeit that the allocation itself lies outside – but adjacent to - of the AONB boundary). The further 35 dwellings that are currently proposed would increase the total number of dwellings to 100.

Development in AONBs (and, by logical extension, in AONB settlements that extend beyond the AONB boundary) is required to be limited in scale and extent. Allocating 100 dwellings on one site would not be consistent with this national policy requirement.

The Board is also concerned that the site boundary incorporates Worcestershire Wildlife Trust's Broadway Gravel Pits Nature Reserve. The Board presumes that this is being done to provide the development's green infrastructure provision. However, if this is the case, then the recreational pressure on the nature reserve could potentially have a significant adverse effect on the biodiversity of the nature reserve. In addition, if the allocation's green infrastructure provision is not incorporated into the housing development itself, the resulting development may have an inappropriately high density of housing.

This allocation does not appear to have been included in the Cotswolds AONB LVSS. Presumably this is because the site was already allocated in the adopted Development Plan.

However, given the increase in the number of dwellings proposed for this site, the Board recommends that a new LVSS is undertaken for this, taking account of the proposed increase in the number of dwellings.

SWDP NEW EDGE 3 (Land at Milton)

The proposed allocation at Milton increases the level of housing provision on this site to double the quantity that is required - via the duty to cooperate - in the Cheltenham, Gloucester and Tewkesbury Joint Core Strategy (i.e. 500 instead of 1,000).

This site lies approximately 3km from the Cotswolds AONB boundary and approximately 4km from elevated footpaths on Bredon Hill. Given this distance, the site was not included in the LVSS, which applies a 2km buffer around the AONB boundary. However, given the size of the proposed allocation, the number of dwellings being proposed and the elevation of views from Bredon Hill, the allocation would still potentially have a significant adverse visual impact on the Cotswolds AONB.

As such, the Board recommends that a LVSS is undertaken for this allocation, in relation to the Cotswolds AONB.

Perhaps more significantly, it is highly likely that the proposed allocation would have a significant adverse impact on the tranquillity of the Cotswolds AONB, due to the increase in traffic that is likely to occur in the AONB villages around Bredon Hill as a result of the allocation. Given the level of traffic congestion in Tewkesbury, it is highly likely that residents of the proposed allocation would use the AONB roads as a 'rat run' to access the A46 to Evesham and on the 'school run' to Bredon Hill Academy, for example. As outlined in the Board's Tranquillity Position Statement, an increase in the number of vehicle movements of more than 10% would be significant and would merit an Environmental Impact Assessment.

As such, the Board recommends that a comprehensive traffic assessment is undertaken to assess the likely increase in traffic through AONB villages and on AONB roads, especially those around Bredon Hill. As outlined in the Board's Tranquillity Position Statement, an increase in the number of vehicle movements of more than 10% would be significant.