

Pre-draft Consultation 8th-19th June 2015 : Cotswold District Council Affordable Housing, Whole Plan and CIL Viability, Methodology and Assumptions.

The Cotswolds Conservation Board wish to make the following comments in relation to this consultation:

- The Board supports the reference given at paragraph 8.13 of the report of the option to consider lower thresholds for affordable homes provision, due specifically to the AONB designation.
- However, overall it is considered that options have been missed elsewhere within the report to refer to the AONB designation in that it may have positive or negative effects on development.
- For example the attached Lloyds TSB research from 2012 highlighted that on average buyers were willing to pay up to 9% more on average for a dwelling in an AONB (as compared to locations outside AONBs).
- Again this may have a positive benefit for developers who can demand higher prices for their new dwellings, however it may have a more negative impact on the provision of generally more affordable homes.
- Reasons for the change in Government guidance (referred to at paragraph 8.13) over affordable homes provision threshold in AONBs, is that historically in rural areas where AONB designation exists, smaller residential schemes have more likely to have been dripped fed through the planning system. Again historically therefore affordable homes provision has been reliant on being a part of those smaller schemes.
- The Board's Cumulus Report (2013) as attached, also confirms the economic benefits (and some negative effects) from location within a nationally protected landscape.
- Generally the development of suitable brownfield sites within settlements are less likely to result in harm to the character and special qualities of the AONB as compared to greenfield sites. The Board therefore recommends that CIL costs are reduced on brownfield sites as compared to greenfield sites to (a) encourage suitable brownfield site re-use within settlements (b) assist with the generally associated higher costs associated with brownfield site re-use within settlements.
- In conclusion, developers will make greater financial gains for the development of land within an AONB as compared to land outside an AONB. Not all of Cotswold District falls within the AONB. In addition, generally those financial gains may be even greater on greenfield sites as compared to brownfield sites, whilst the development of greenfield sites has the potential to cause the greatest level of harm to the purposes of AONB designation. Therefore, the CIL report should reflect more clearly the existence of the AONB and the potential positive and negative impacts it may have on the development model.
- In terms of looking to the future of how CIL may be spent in relation to development that may come forward within the nationally protected Cotswolds AONB, the Board would

welcome consideration of CIL money being spent on supporting specific landscape, biodiversity, and access projects that the Board can help identify and deliver.