



COTSWOLDS CONSERVATION BOARD

DRAFT POSITION STATEMENT

HOUSING NEED

CONTEXT

The Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 (Policy CE12) states 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, maintaining and enhancing local community amenities and services, and improving access to these amenities and services.

Robust evidence of local need arising from within the Cotswolds AONB is also one of the over-arching principles of the Cotswolds Conservation Board's Planning and Development Position Statement.

This Housing Need Position Statement expands on these policies and principles, specifically in the context of housing need. It complements – and is supplementary to – the Planning and Development Position Statement. As such, when considering housing need in the AONB, it would be appropriate for regard to be given to both position statements.

The Board recognises that the Cotswolds AONB is a living and working landscape in which meeting the housing needs of AONB communities is a key consideration. The Board also recognises the demand for housing at a national level, with the government having an objective to build 300,000 homes per year, and the pressure that this puts on local authorities to accommodate this demand.

However, national planning policy also recognises that:

- the scale and extent of housing development in AONBs should be limited;
- policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing in full through the plan-making process;
- AONBs are unlikely to be suitable areas for accommodating unmet housing needs arising from adjoining, non-designated, areas.⁽⁶⁾

In addition, within the Cotswolds AONB, the adopted West Oxfordshire Local Plan has highlighted the importance of providing robust evidence of need at the AONB settlement / parish and sub-area level, both at the housing allocation stage of the Local Plan process and in development management.

Therefore, whilst the Board recognises that the assessment of objectively assessed needs will normally be a local authority's starting point when determining housing need for their area, there will be many other AONB-related factors that should be taken into consideration.

This Position Statement, together with the supporting guidance (which is available as a separate document), is intended to help relevant stakeholders, including local authorities and developers, to:

AGENDA ITEM 10 – APPENDIX A HOUSING NEED POSITION STATEMENT

- provide robust evidence of housing need arising within the Cotswolds AONB, particularly the need for housing that is affordable in perpetuity, when allocating or proposing housing in the AONB;
- fully take this evidence into account when determining appropriate levels of housing provision within the AONB;
- ensure that housing provision in the AONB focusses on meeting the needs of those people who live, work, or have family connections in, the AONB, especially relatively low income households;
- provide an appropriate level of (affordable) housing within the Cotswolds AONB that is consistent with the purpose of AONB designation.

The Board's key recommendations for achieving these objectives are outlined below. It is hoped that the Position Statement and supporting guidance will be help to ensure that these objectives and recommendations are implemented consistently across the whole of the AONB, whilst providing sufficient flexibility to take account of the different constraints and opportunities that apply in each local authority area.

The Position Statement is applicable at both the plan-making stage (including Local Plans and Neighbourhood Development Plans) and at the development management stage.

The principles and recommendations in this Position Statement, together with the supporting guidance document, are based on existing best practice, both within the Cotswolds AONB and in other protected landscapes.

As this is a Cotswolds Conservation Board Position Statement, it carries the full weight of the Cotswolds AONB Management Plan as a material consideration in planning decisions.

OVER-ARCHING RECOMMENDATIONS

- AONB-related constraints should be fully taken into account in housing and land availability assessments, housing requirement figures and associated assessments such as Sustainability Appraisals.
- Local planning authorities should give consideration to whether AONB-related constraints merit 'exceptional circumstances' which 'justify an alternative approach' to the standard method for assessing housing need.
- If a local authority is required to accommodate unmet needs from neighbouring local authorities, these unmet needs should not normally be accommodated in the Cotswolds AONB or used in calculations of housing need for housing allocations / developments in the AONB.
- The Cotswolds AONB should not normally be required to accommodate needs arising within adjacent urban areas, especially where the AONB boundary provides a clear delineation between the built environment of the adjacent urban area and undeveloped land within the AONB.
- Where AONB-related constraints mean that objectively assessed housing needs (OAHN) would not be met, the local planning authority (LPA) should:

AGENDA ITEM 10 – APPENDIX A
HOUSING NEED POSITION STATEMENT

- **consider using a housing requirement figure - and a five year housing supply figure - that is less than the OAHN, as least in the AONB part of the LPA area;**
- **seek to accommodate the additional housing need outside the AONB - this could be within their own area or, through the duty to cooperate, in other local authority areas.**

- **In the Cotswolds AONB, priority should be given to the provision of housing that is affordable in perpetuity and which genuinely meets the needs of households with a local connection to the AONB that are most in need.**

- **The evidence base for housing allocations within the Cotswolds AONB should include robust evidence local (affordable) housing need arising within the AONB. This evidence base should be based on the following hierarchy, taking into consideration the extent to which the AONB extends into the local authority area:**
 - **the specific AONB settlement / parish where housing is being considered, primarily through an up-to-date housing needs survey;**
 - **relevant AONB 'sub-areas' within the local authority area (e.g. clusters of parishes based around an AONB market town or a geographically contiguous section of the AONB);**
 - **the whole of the AONB area that lies within the local authority area.**

- **Windfall housing development proposals in the Cotswolds AONB should be required to provide robust evidence of local (affordable) housing need arising within the AONB, based on the above hierarchy.**

- **Local authorities should prioritise undertaking housing needs surveys in the AONB. Ideally, these surveys should be undertaken on a rolling five year programme within the AONB to ensure that this evidence base remains valid and up-to-date.**

- **Data from choice-based lettings systems, such as Homeseeker Plus, should not be used explicitly as a measure of affordable housing need. However, it may be appropriate to cross-reference this data with more robust evidence, such as housing needs survey data.**

- **Within the Cotswolds AONB, choice-based lettings systems should prioritise 'local connection' to settlements within the AONB (or, at least, to the local authority area).**

- **When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies that require:**
 - **at least 50% affordable housing in market-led housing developments within the AONB, with the majority of this affordable housing being affordable in perpetuity (for example, social rented housing);**
 - **100% affordable housing on Rural Exception Sites, with the majority of this affordable housing being affordable in perpetuity, with a lower**

AGENDA ITEM 10 – APPENDIX A
HOUSING NEED POSITION STATEMENT

percentage only being permitted in exceptional circumstances and the absolute minimum being 75%.

- **In circumstances where the evidenced affordable housing need (plus any associated market housing) is below the landscape capacity of the proposed allocation / development site, housing provision should be based on the housing need rather than on the landscape capacity.**
- **Where the housing need arising within the Cotswolds AONB (or the objectively assessed need) exceeds the landscape capacity, the amount of housing allocated / permitted should not exceed the landscape capacity.**
- **Where the housing need arising within the Cotswolds AONB is less than the landscape capacity, development should be based on the housing need.¹**
- **Where restrictions relating to development in the Cotswolds AONB mean that objectively assessed housing needs cannot be met in full, local authorities should work with neighbouring authorities outside, through the duty to cooperate and statements of common ground, to identify how these unmet housing needs can best be accommodated outside the AONB.**
- **For settlements that overlap with the Cotswolds AONB boundary, the whole settlement should be considered as an AONB settlement for the purposes of the above recommendations.**

¹ The Cotswolds Conservation Board recognises that there may be circumstances in which higher levels of (affordable) housing provision may be appropriate, such as in settlements that are higher up the settlement hierarchy or which act as a transport hub. However, the evidenced affordable housing need should still be a key consideration, with robust justification being provided for any additional housing that may be required.