

COTSWOLDS CONSERVATION BOARD

DRAFT POSITION STATEMENT



Housing

CONTEXT

The Cotswolds National Landscape¹ is a landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it.² The statutory purpose of its designation is to conserve and enhance the natural beauty of the area.³

The Cotswolds National Landscape is also a living and working landscape in which the social and economic well-being of local communities are important considerations. Maintaining vibrant and thriving local communities is essential to the long-term future of the National Landscape. Providing housing that meets the needs of the local communities within the Cotswolds National Landscape plays an important role in achieving these aspirations.

However, as outlined in the Landscape-Led Development Position Statement, these aspirations (including housing provision) need to be delivered in a way that is compatible with – and positively contributes to – the statutory purpose of designation.

The outstanding natural beauty of the Cotswolds National Landscape makes it a very desirable place to live. This brings with it increased pressure to build more houses. It also potentially results in house prices that are higher than in surrounding areas. This contributes to the housing market within the National Landscape becoming increasingly unaffordable to people with a local connection.

This is particularly important given that many of the jobs that are essential to (i) conserving and enhancing the natural beauty the area (e.g. farming and forestry) and (ii) increasing the understanding and enjoyment of its special qualities (e.g. the tourism sector) are relatively low paid. These workers, especially young people, are being priced out of the housing market in the landscapes and communities that depend on them.

As such, the provision of affordable housing that meets the needs of local communities, including the provision of housing that is affordable in perpetuity, should be a high priority in the Cotswolds National Landscape.

For these reasons, this position statement advocates two over-arching principles for housing development within the Cotswolds National Landscape and its setting:

- **Housing development within the Cotswolds National Landscape and, where relevant, in its setting, should be 'landscape-led'.**
- **Housing development within the Cotswolds National Landscape should be based on robust evidence of local need arising within the National Landscape.**

Key recommendations relating to the 'landscape-led' approach to housing are provided in the Landscape-Led Development Position Statement. As such, this position statement primarily focusses on housing need and affordable housing, although it also briefly addresses the location and design of housing developments.

PURPOSE OF THE POSITION STATEMENT

The primary purpose of the Board's position statements is to expand on relevant policies in the Cotswolds AONB Management Plan 2018-2023. They provide further context, guidance and recommendations in relation to specific policies and associated issues. They are not intended to create new policies.

The Board's position statements are also intended to help local authorities, developers and other relevant stakeholders:

- to have regard to – and positively contribute to - the purpose of AONB designation;
- to ensure that the purpose of AONB designation is not compromised by development and that the natural beauty of the Cotswolds National Landscape is conserved and enhanced;
- to fulfil the requirements of the National Planning Policy Framework and Planning Practice Guidance (or, where relevant, National Policy Statements) with regards to AONBs and the factors that contribute to their natural beauty;
- to take account of relevant case law;
- to have regard to and be consistent with the AONB Management Plan and guidance published by the Board;
- to emulate best practice in the Cotswolds National Landscape and other protected landscapes;
- to develop a consistent and coordinated approach to relevant issues across the whole of the Cotswolds National Landscape and its setting.⁴

The Landscape-Led Development Position Statement outlines the policies in the Cotswolds AONB Management Plan that are most relevant to the landscape-led approach advocated in that position statement.

With regards to housing need and affordable housing, the most relevant policy is Policy CE12 (Development Priorities and Evidence of Need), which states that:

1. 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.
2. The extent to which the Cotswolds AONB is required to accommodate objectively assessed needs arising from outside the AONB should be limited. Where, as a result of this constraint, objectively assessed needs cannot be met wholly within a particular plan area, local planning authorities should work together to identify if these needs could be met elsewhere outside the AONB.
3. Local planning authorities should provide annual statistics on the rate of development in their sections of the Cotswolds AONB and its setting.

STATUS OF THE POSITION STATEMENT

The Board's position statements are supplementary – and subsidiary - to the Cotswolds AONB Management Plan. However, it is worth noting that the Cotswolds AONB Management Plan 2018-2023 states that development proposals in the Cotswolds National Landscape and its setting should be compatible with the AONB Management Plan and with guidance produced by the Cotswolds Conservation Board, including the Board's position statements.⁵ As such, for development

proposals to be compatible with the AONB Management Plan, they should also be compatible with the relevant position statements.

The AONB Management Plan may be a material consideration in planning decisions. However, we acknowledge that, in a plan-led planning system, it is the policies of the relevant local authority development plan that have the greatest weight in planning decisions. As such, within this planning system, the hierarchy of development plans, AONB Management Plan and position statements is as follows:

1. Local authority development plan.
2. AONB Management Plan.
3. Position statements.

In some instances, some of the guidance and / or recommendations in the Board's position statements might go further than the policies of current development plans. Hopefully, as new iterations of the local authority development plans are developed, we hope that the guidance and recommendations from the position statements will be incorporated into these new iterations.

ACHIEVING THE RIGHT BALANCE

The Cotswolds Conservation Board recognises that achieving the right balance, in terms of the quantum and type of housing that should be delivered in the Cotswolds National Landscape and its setting, is a difficult challenge for local authorities, especially where a significant proportion of their area lies within the National Landscape.

Achieving the right balance is likely to become more challenging, given the pressure on local authorities to allocate and permit more and more homes, combined with a decrease in the number of suitable sites as more of these sites are developed over time. This pressure is demonstrated by the fact that the Cotswolds National Landscape has already experienced a three-fold increase in the average number of housing units being permitted per annum between 2012 and 2017.⁶

We also recognise that there may be exceptional circumstances in which major housing developments are permitted in the Cotswolds National Landscape, or its setting, that have the potential to have a significant adverse impact on the natural beauty of the National Landscape and / or meet needs arising elsewhere.

However, we hope that this position statement will help to ensure that the right balance is achieved across the whole of the Cotswolds National Landscape, with an appropriate quantum and type of housing being delivered in a way that is compatible with the purpose of AONB designation and which meets the needs local communities within the National Landscape.

LOCAL NEED & AFFORDABLE HOUSING

HOUSING NEED v HOUSING REQUIREMENTS

The first step in the process of deciding how many homes need to be planned for in an area is to assess housing need.⁷ The NPPF sets an expectation that this assessment should follow the Government's 'standard method', although it does allow for an alternative approach to be used in exceptional circumstances.⁸

However, it is important to note that 'housing need', as calculated using the standard method, is an *unconstrained* assessment of the number of homes needed in an area.⁹ In contrast, establishing

the 'housing requirement' for an area requires consideration of 'constraints'¹⁰, including the AONB designation.

As such, there is a clear distinction between 'housing need' and 'housing requirement'.

Unfortunately, development plan consultation documents sometimes create the impression that the local authority area must accommodate the housing need figure identified through the standard method (i.e. that this figure is a 'target'). Efforts to accommodate this housing need figure potentially risk harming the outstanding natural beauty of the Cotswolds National Landscape.

The Government has recently provided some useful clarification on this issue, stating that:

- *More broadly, we heard suggestions ... that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.¹¹*
- *Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after considerations of this, alongside what constraints areas face ... and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF... It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.*

The requirement to take account of AONBs in this process is an important factor in the Government's assertion that NPPF policies relating to AONBs 'may mean that objectively assessed needs cannot be met in full through the plan making process'.¹²

The recommendations outlined in the Landscape-Led Development Position Statement are an important consideration in this process.

Recommendations:

- The housing need figure identified using the Government's standard method should not be presented as a 'target' for housing provision.
- The recommendations outlined in the Board's Landscape-Led Development Position Statement should be an important consideration when assessing housing and economic land availability.
- It should be recognised that the policies of the NPPF, relating to AONBs and other relevant designations, may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process.
- Consideration should be given to whether the constraints relating to the AONB designation merit exceptional circumstances which may justify an alternative approach to the standard method for assessing housing need.¹³

INSUFFICIENT SITES / BROAD LOCATIONS TO MEET NEEDS

If objectively assessed needs cannot be met in full, factoring in constraints, Government guidance states that it will be important to establish how needs might be met in adjoining areas. The guidance goes on to state that if, following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.¹⁴

Recommendation:

- If AONB-related constraints mean that objectively assessed needs cannot be met in full, local authorities should seek to identify how these needs might be met in neighbouring authority areas.¹⁵

ACCOMMODATING UNMET NEEDS, ARISING ELSEWHERE, WITHIN THE COTSWOLDS NATIONAL LANDSCAPE

Many of the local authority areas that overlap with the Cotswolds National Landscape are (through the duty to cooperate and statements of common ground) required to accommodate unmet needs arising in adjoining local authorities areas. This adds to the overall pressure for more housing within the local authority area, including within the section of the local authority area that overlaps with the Cotswolds National Landscape.

Within the local authority areas that overlap with the Cotswolds National Landscape there are a number of locations where the National Landscape boundary provides a clear delineation between the built environment of settlements that are adjacent to the National Landscape and relatively undeveloped land within the National Landscape. There is often pressure to, in effect, extend the built environment of these settlements into the National Landscape.

However, Government guidance makes it clear that AONBs *'are unlikely to be suitable areas for accommodating unmet needs arising from adjoining (non-designated) areas'*.¹⁶

As such, the Cotswolds National Landscape is unlikely to be a suitable area for accommodating the unmet needs from local authority areas that do not overlap with the National Landscape even if the overlapping local authorities do have to accommodate this unmet need. In addition, it is unlikely that it would be appropriate to extend, into the National Landscape, the built environment of settlements that lie adjacent to the National Landscape.

The Government guidance does not define 'unlikely' in this context. It may be appropriate to apply the requirements of paragraph 172 of the NPPF, relating to major development, in this regard.

Recommendations:

- Where a local authority area that overlaps with the Cotswolds National Landscape is required to accommodate unmet needs from neighbouring local authorities, this unmet need should not be factored into housing provision in the Cotswolds National Landscape at either the plan-making stage or development management stage.*
- Housing developments that would extend, into the Cotswolds National Landscape, the built environment of settlements adjacent to the National Landscape should not be allocated or permitted.*

*Except in exceptional circumstances and where it can be demonstrated that the development would be in the public interest.

AFFORDABLE HOUSING

As outlined above, Policy CE12 of the Cotswolds AONB Management Plan 2018-2023 states that *'priority should be given to the provision of affordable housing'*.

There are a number of reasons for prioritising the provision of affordable housing in the Cotswolds National Landscape. For example, as outlined above, the outstanding natural beauty of the

Cotswolds National Landscape makes it a desirable place to live. As a result, housing may be more expensive and less affordable than in areas outside the National Landscape.

Government guidance recognises that National Parks, at least, *'are not suitable locations for unrestricted housing'*.¹⁷ Similarly, the Government's Planning White Paper (2020) states that *'the whole purpose of National Parks would be undermined by multiple large scale housing developments'*.¹⁸ Instead, *'the expectation [in National Parks] is that new housing will be focussed on meeting affordable housing requirements, supporting local employment opportunities and key services'*.¹⁹

AONBs have the same level of protection as National Parks, with regards to conserving and enhancing landscape and scenic beauty. The NPPF now also requires that the scale and extent of development in AONBs (as with National Parks) should be limited.²⁰ As such, it is logical to apply the same principles, outlined above for National Parks, in AONBs as well.

The need to provide more affordable housing is also addressed in the proposals of the Government-commissioned Landscape Review Final Report (commonly referred to as the Glover Review / Report).²¹

Recommendations:

- Housing provision in the Cotswolds National Landscape should be focussed on – and prioritise - meeting affordable housing requirements.

AFFORDABLE IN PERPETUITY

The term 'affordable housing' covers a various types of affordable housing, some of which are intended to be affordable in the longer term (i.e. in perpetuity) and some of which are not.²²

The Government guidance for National Parks, referred to above, specifies that National Park Authorities should work to *'ensure that ... affordable housing remains so in the longer term'*.²³ The Landscapes Review Final Report reiterates this point, stating that *'National Parks, as planning authorities, should consider using their powers to set conditions on new housing to ensure it remains affordable'*.²⁴ This focus on housing that is affordable in perpetuity is reflected in many National Park Local Plans (see Appendix 2 for relevant case studies), with social rented housing being a particular priority.

As explained in the 'Affordable Housing' section, given that AONBs have the same status of protection as National Parks, in terms of conserving and enhancing landscape and scenic beauty, it is logical to apply the same principles in AONBs.

If housing does not remain affordable in perpetuity, this will either lead to a reduction in the stock of affordable housing or will require the building of additional affordable housing to compensate for this reduction. As such, more new housing would be required in a scenario where housing does not remain affordable in perpetuity. This would not be compatible with the requirement to limit the scale and extent of development in AONBs.

The Cotswolds Conservation Board acknowledges that the Government sets certain requirements on the types of affordable housing that should be provided in new housing developments, not all of which are affordable in perpetuity. We also acknowledge that the type and tenure of new housing should reflect locally identified need. However, within these requirements, there is still scope to prioritise – and set conditions for - housing that is affordable in perpetuity.

Recommendation:

- Within the context of Government requirements and locally identified need, priority should be given to the provision of housing that is affordable in perpetuity, including social rented housing.

LOCAL CONNECTION

Across the Cotswolds National Landscape, there are a number of ‘choice-based lettings’ (CBL) schemes that allow applicants to search, apply and bid for social rented properties in their area. For example, the Homeseeker Plus scheme operates within Gloucestershire and West Oxfordshire, which collectively cover approximately 75% of the Cotswolds National Landscape area.

The Homeseeker Plus Policy Document specifies that *‘due to the exceptional demand for housing ... and the difficulty in solving local housing need, preference will usually be given to applicants with a local connection²⁵ to the local district’*.²⁶ However, it is our understanding that this requirement is not applied consistently across the whole of the Homeseeker Plus area.

The Cotswolds Conservation Board supports the priority given to local connection in such schemes. This is because we consider that this approach:

- helps to limit the scale and extent of new housing (by limiting the demand for affordable housing, within the Cotswolds National Landscape, from applicants that do not have a local connection);
- is compatible with the Board’s duty to foster the social well-being of local communities within the AONB.

It is worth noting that local connection (in terms of residence) is also, inherently, a feature of rural housing need surveys as the data in these surveys relates to households within a specific parish.

Recommendation:

- The local connection requirement of choice based lettings systems should be applied consistently across the Cotswolds National Landscape.

AFFORDABLE HOUSING PROVISION

Another important consideration is the percentage of affordable housing that should be provided in housing developments.

In many protected landscapes:

- market-led housing developments are required to provide 50% affordable housing;
- for Rural Exception Sites, there is an expectation that such sites will deliver 100% affordable housing (or, at least, a minimum of 75% affordable housing where 100% is not viable)
- provision of affordable housing is sought for residential developments of 5 units or fewer.²⁷

Appendix 2 provides examples of what we would consider to be ‘best practice’ case studies. In some protected landscapes, such as the Arnside & Silverdale AONB, 50% affordable housing is required for developments of two or more dwellings.²⁸

The Cotswolds Conservation Board supports these measures for a number of reasons. For example, having a high percentage of affordable housing will reduce the total number of houses

that need to be built to meet locally identified affordable housing need.²⁹ This, in turn, would help to ensure that the scale and extent of development in AONBs is limited, as required in paragraph 172 of the NPPF. The higher price tag associated with housing in protected landscapes is another factor in justifying a high / higher level of affordable housing in these areas.

It is also worth noting that the Landscapes Review Final Report recommends that '*local planning authorities in AONBs should also make use of the provision that allows them to demand on-site affordable housing contributions on all sites, including developments of five homes or fewer*'.³⁰

We acknowledge that the viability of such options would need to be tested in viability assessments.

Recommendations:

- When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies for affordable housing provision in the Cotswolds National Landscape that require:
 - at least 50% affordable housing in market housing developments;
 - 100% affordable housing on Rural Exception Sites, with a lower percentage only being permitted in exceptional circumstances and the absolute minimum being 75%;³¹
 - on-site affordable housing provision for housing developments of five units or fewer.

EVIDENCE OF LOCAL NEED ARISING WITHIN THE COTSWOLDS NATIONAL LANDSCAPE

As outlined earlier in this position statement, we acknowledge that the Government's standard method is the starting point for calculating housing need in a local authority area. This housing need figure is then 'filtered' through the assessment of housing and economic land availability. This assessment, which takes account of relevant constraints, including the AONB designation, leads to a housing requirement figure. This housing requirement figure, together with the settlement hierarchy, then forms the basis of the spatial strategy for housing provision, as set out in the Local Plan. These spatial strategies sometimes identify the housing requirement for specific sub-areas (which sometimes match sub-areas of the Cotswolds National Landscape) or even individual settlements.

However, at both the plan-making stage and the development management stage, we encourage local authorities and other stakeholders to have regard to Policy CE12 of the Cotswolds 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*'. Given that Policy CE12 also prioritises affordable housing, a key consideration, in this context, is whether there is robust evidence of local *affordable* housing need arising from within the Cotswolds National Landscape.

Within this context, we consider that robust evidence of local affordable housing need arising from within the Cotswolds National Landscape includes:

- an up-to-date (rural) housing needs survey for the parish where housing is being considered;
- validated choice-based lettings system data where there is a local connection to - and preference for - the relevant parish / settlement (albeit with the caveats outlined later in this position statement);
- housing allocations that address affordable housing need in an up-to-date Neighbourhood Development Plan.

Recommendations

- At the plan-making stage, local authorities should have regard to robust evidence of affordable housing need arising within the Cotswolds National Landscape (as defined above) when assessing potential housing allocations.
- At the development management stage, housing development proposals:
 - (i) within the settlement boundary should have regard to robust evidence of affordable housing need arising within the Cotswolds National Landscape (as defined above);
 - (ii) outside the settlement boundary, or equivalent, should be based on robust evidence of affordable housing need arising within the Cotswolds National Landscape (as defined above).

RURAL HOUSING NEED SURVEYS

As outlined above, rural housing need surveys (HNS) form an important part of the evidence base for potential housing developments. However, little weight is given to such surveys if they are out-of-date (i.e. more than five years old). Without this evidence base, more weight is likely to be given to the district-wide housing requirement figure (or even the housing need figure), which could potentially result in a larger number of houses being built.

Given that the provision of affordable housing that meets local needs is a key priority in the Cotswolds National Landscape, it may be appropriate to prioritise HNS in the National Landscape.

Recommendations:

- Housing need surveys should be kept up-to-date, particularly for parishes within the Cotswolds National Landscape where housing is likely to be allocated (for example, settlements higher up the settlement hierarchy) and / or where there is strong developer interest in new housing. Ideally, this would be done on a five year rolling programme.

CHOICE BASED LETTINGS SYSTEMS

As outlined above, data from choice-based lettings systems (CBL), such as Homeseeker Plus, form an important part of the evidence base for potential housing developments. However, this data can potentially be manipulated to present inflated affordable housing need figures. For example, households can express a preference for up to three locations, which could lead to double, or even triple, counting of housing need. As such, it should not be used explicitly as a measure of affordable housing need. It may be appropriate to cross-reference this data with other evidence of affordable housing need, such as housing needs survey data.

The flowchart in Appendix 3, provides some additional context on this issue.

Recommendation:

- Data from choice-based lettings systems, such as Homeseeker Plus, should not be used explicitly as a measure of affordable housing need unless the data has been verified and there is a clear local connection to – and preference for – the settlement in question.

SECOND HOMES

As stated in Cotswold District Council's response to the autumn 2020 consultation on the Government's Planning White Paper, *'second home ownership and buy to let have removed housing from the market that could otherwise be made available to first home owners, and the resulting*

increased demand within a reduced pool of housing stock inflates house prices and worsens affordability'. This issue can be particularly challenging in protected landscapes, such as the Cotswolds National Landscape, whose outstanding natural beauty makes them very desirable places to visit and holiday in. This issue is recognised as being sufficiently significant in some protected landscape areas that it is explicitly addressed in Local Plan policies. For example, Policy HC-S4 of the Exmoor National Park Local Plan requires new market housing to be 'principal residence' housing.³²

Recommendation:

- When local authorities are reviewing their Local Plans, they should give consideration to setting policies that ensure that new market housing is used as a principal residence rather than as a second home or holiday home.

LOCATION & DESIGN

The Government's planning practice guidance states that *'all development in ... AONBs will need to be located and designed in a way that reflects their status as landscapes of the highest quality'*.³³ This guidance also states that poorly located or designed development in the setting of AONBs *'can do significant harm'* to the landscape and scenic beauty of the AONBs. It adds that *'development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account'*.³⁴

LOCATION

As outlined in the Landscape-Led Development Position Statement, a key consideration in locating new development is to avoid allocating or permitting development on sites (or land parcels) that have been identified as having high or medium-high landscape sensitivity to the type and scale of development being proposed.

Another key consideration is locating new housing development close to essential services and facilities, so as to reduce / minimise reliance on car use to access these services and facilities. In other words, focussing on housing development on settlements higher up the 'settlement hierarchy'.

An increasingly important consideration, with an increasing number of people working from home, is access to fibre optic and cable broadband.

Recommendations:

- New housing should not be located in areas that have been identified, in landscape and visual sensitivity studies, as having high or high-medium sensitivity to the scale of housing development being proposed.
- The location of new housing should be consistent with the 'settlement hierarchy' approach, whereby housing is targeted towards settlements that have a good level of services and facilities, including travel options that allow for car-free travel.
- New housing should have access to fibre optic and / or cable broadband.

DESIGN

Several of the 'special qualities'³⁵ of the Cotswolds National Landscape relate directly to the design of housing, including:

- The unifying character of the limestone geology – its visible presence in the landscape and use as a building material.
- Variations in the colour of the stone from one part of the AONB to another which add a vital element of local distinctiveness.
- Distinctive settlements, developed in the Cotswold vernacular, high architectural quality and integrity.

These special qualities are reflected in Policy CE3 (Local Distinctiveness) of the Cotswolds AONB Management Plan 2018-2023, which states that *‘proposals that are likely to impact on the local distinctiveness of the Cotswolds AONB should have regard to, be compatible with and reinforce this local distinctiveness. This should include ... being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials’* and *‘using an appropriate colour of limestone to reflect local distinctiveness’*.³⁶ Policy CE3 also supports *‘innovative designs which are informed by local distinctiveness, character and scale’*.

The Board publication, ‘Local Distinctiveness and Landscape Change’ provides guidance on: settlement types and settlement patterns in different landscape character types (LCTs); and on locally distinctive roofs, walls and boundary features, including how these vary across the Cotswolds National Landscape.³⁷

In addition, the Cotswolds AONB Landscape Strategy and Guidelines provides guidance on the potential landscape implications of housing developments in each LCT and how potential adverse impacts can potentially be avoided and / or minimised.³⁸ Appendix 4 of this position statement provides a relevant extract from the Landscape Strategy and Guidelines.

Another key reference point for the design of new housing is the design guides / guidance published by the local authorities, sometimes as part of the local authority development plan. There is not, currently, one over-arching design guide for the whole of the Cotswolds National Landscape.

An increasingly important consideration will be the extent to which new housing development incorporates energy conservation and renewable energy measures, such as solar panels, as part of the overall objective of mitigating the impacts of climate change. Ideally, this should be done in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape. The Board has published guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds AONB.³⁹

Recommendations:

- New housing in the Cotswolds National Landscape should:
 - respect the locally distinctive characteristics of the existing settlement;⁴⁰
 - respect the relevant ‘special qualities’ of the Cotswolds National Landscape;
 - be consistent with relevant policies of the Cotswolds AONB Management Plan;
 - be consistent with the guidelines in ‘Cotswolds AONB Landscape Strategy and Guidelines’;
 - be consistent with the guidelines in ‘Cotswolds AONB Local Distinctiveness and Landscape Change’.
- New affordable housing should be indistinguishable from market housing in character and design quality and should be fully integrated into the village fabric.⁴¹

SUPPORTING INFORMATION

In addition to the 'end notes' provided below, this Position Statement is supported by a number of appendices (as a separate document), which provide:

- Extracts from the Government's guidance on 'Housing and Economic Land Availability Assessment' (Appendix 1).
- Case studies of best-practice (Appendix 2).
- A flowchart of the extent to which 'Homeseeker Plus' data equates to convincing evidence of need within a specific settlement (Appendix 3).
- A sample extract from the Cotswolds AONB Landscape Strategy & Guidelines relating to housing development in Landscape Character Type 1 (Escarpment Outliers) (Appendix 4).

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END NOTES

¹ Cotswolds National Landscape is the new name for the Cotswolds Area of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.

² Section 82 of the Countryside and Rights of Way Act 2000 ([link](#)). See also Appendix 1 of the Cotswolds AONB Management Plan 2018-2023 for further information ([link](#)).

³ Defra (2019) *Areas of Outstanding Natural Beauty: technical support scheme (England) 2019 to 2020* ([link](#)).

⁴ Fifteen local authority areas overlap with the Cotswolds National Landscape⁴, with each with local authority having its own development plan. Four of these local authorities are County Councils, whose development plans primarily deal with minerals and waste issues. Eight of the local authorities are district or borough councils whose development plans deal with issues other than minerals and waste, with housing provision being a key priority. Three of the local authorities are unitary authorities whose development plans deal with all of the above issues.

⁵ Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CE10 (Development and Transport).

⁶ Dixon, D., Sinden, N., Crabtree, T (2017) *An Independent Review of Housing In England's Areas of Outstanding Natural Beauty 2012-2017*. Table 4: pre-2012 = 217 units per year average; 2015-2017 = 635 units per year average. This data relates to development of 10+ dwellings ([link](#)).

⁷ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>. Paragraph 001.

⁸ NPPF ([link](#)): paragraph 60.

⁹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>. Paragraph 001.

¹⁰ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Including paragraphs 002, 010, 012, 013, 014, 015, 018, 021 and 025.

¹¹ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system#proposed-changes-to-the-standard-method-for-assessing-local-housing-need>

¹² <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

¹³ Paragraph 60 of the NPPF states that '*strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance - unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals*' (N.B. Underlining added for emphasis). The Government's guidance on 'Housing and economic needs assessment' ([link](#)) (paragraph 003) adds that the use of the standard method is not mandatory '*if it is felt that circumstances warrant an alternative approach*'. However, it reiterates the point that this should only apply in exceptional circumstances and adds that any such alternative approach '*can expect to be scrutinised more closely at examination*'.

'Exceptional circumstances' could potentially include a scenario in which AONB constraints mean that the amount of housing that could be provided without (significantly) adversely affecting the natural beauty of the Cotswolds National Landscape would fall well below OAN levels. In this scenario, it may be more appropriate to base housing need and housing provision on evidence of (affordable) housing need within individual parishes (such as Housing Need Surveys). This would be more in line with best-practice in National Parks and some other AONBs (for example, Arnside and Silverdale AONB) – see the case studies in Appendix 2 for further information.

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- ¹⁴ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Paragraph 025.
- ¹⁵ This is consistent with the Government’s planning practice guidance relating to ‘Natural Environment’ (paragraph 041) ([link](#)) and ‘Housing and Economic Land Availability Assessment’ (paragraph 025) ([link](#)).
- ¹⁶ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.
- ¹⁷ Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* ([link](#)). Paragraph 78.
- ¹⁸ Ministry of Housing Communities and Local Government (2020) *White Paper: Planning for the Future* ([link](#)). Paragraph 2.25.
- ¹⁹ Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* ([link](#)). Paragraph 78.
- ²⁰ NPPF ([link](#)): paragraph 172. See also Appendix 9 of the Cotswolds AONB Management Plan 2018-2023.
- ²¹ Defra (2019) *Landscapes Review Final Report* ([link](#)). Proposal 18: A new National Landscapes Housing Association to build affordable homes.
- ²² The NPPF (Annex 2: Glossary) defines affordable housing as ‘*housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and / or is for essential local workers), and which complies with one or more of the following*’:
- a) Affordable housing for rent.
 - b) Starter homes.
 - c) Discount market sales housing.
 - d) Other affordable routes to home ownership.
- ²³ Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* ([link](#)). Paragraph 79.
- ²⁴ Defra (2019) *Landscapes Review Final Report* ([link](#)). Supporting text for Proposal 18: A new National Landscapes Housing Association to build affordable homes.
- ²⁵ Section 199 of the Housing Act 1996 ([link](#)) specifies that a person has a local connection with the district of a local authority housing authority if he has a connection with it—
- (a) because he is, or in the past was, normally resident there, and that residence is or was of his own choice,
 - (b) because he is employed there,
 - (c) because of family associations, or
 - (d) because of special circumstances.
- ²⁶ <https://www.homeseekerplus.co.uk/choice/uploads/GH%20Policy%2014.10.16%20homeseeker%20plus.pdf>. Section 11 – Local Connection.
- ²⁷ This makes use of the provision in paragraph 63 of the NPPF, which allows for affordable housing to be required in residential developments of 5 units or fewer in designated rural areas.
- ²⁸ Lancaster City Council and South Lakeland District Council (2019) *Arnside & Silverdale Area of Outstanding Natural Beauty (AONB) Development Plan Document*. Adopted Version 29 March 2019 ([link](#)). Policy AS03 – Housing Provision.
- ²⁹ For example, the affordable housing need identified in rural housing need surveys.
- ³⁰ Defra (2019) *Landscapes Review Final Report* ([link](#)). Proposal 18: A new National Landscapes Housing Association to build affordable homes.

³¹ The Conservation Board is aware of Rural Exception Sites (RES) that have been permitted in the Cotswolds National Landscape where the proportion of affordable housing is as low as 51%. We consider that 51% is closer to the level of affordable housing provision should be provided in market housing schemes. This level of affordable housing provision in a RES undermines the purpose of allowing such development, on sites where housing would not normally be permitted, which is to meet locally identified affordable housing needs. It also allows for excessive levels of market housing on such sites, which would not be appropriate in a protected landscape.

³² https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0027/257751/Part-6-Achieving-a-Thriving-Community.pdf. Page 153.

³³ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

³⁴ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

³⁵ See Chapter 2 of the Cotswolds AONB Management Plan 2018-2023 for more information on ‘special qualities’.

³⁶ Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CE3.

³⁷ Cotswolds Conservation Board (2003) *Cotswolds AONB Local Distinctiveness and Landscape Change* ([link](#)).

³⁸ Cotswolds Conservation Board (2004) *Cotswolds AONB Landscape Strategy and Guidelines* ([link](#)).

³⁹ Cotswolds Conservation Board (2004) *Traditional Cotswold Buildings – Saving Energy* ([link](#)).

⁴⁰ The most significant, locally distinctive characteristics of a settlement are normally found in the historic core of the settlement, for example, in the Conservation Area (where this has been designated). Conservation Area Statements and Village Design Statements can be a useful reference point in this regard.

⁴¹ This reflects best practice in protected landscapes – see the case studies in Appendix 2 for further information.