

WYE VALLEY AONB JOINT ADVISORY COMMITTEE

POSITION STATEMENT: HOUSING DEVELOPMENT IN THE WYE VALLEY AONB AND ITS SETTING

1.0 CONTEXT

1.1 The Wye Valley Area of Outstanding Natural Beauty (AONB) is a landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it¹. The statutory purpose of the AONB designation is to conserve and enhance the natural beauty of the area².

1.2 The Wye Valley AONB 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 AONB. Providing housing that meets the needs of the local communities within the Wye Valley AONB plays an important role in achieving these aspirations.

1.3 However, as outlined in the Wye Valley AONB Position Statement on Landscape-led Development, 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.

1.4 The outstanding natural beauty of the Wye Valley AONB (along with its relative proximity to several cities), 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 AONB becoming increasingly unaffordable to those with a local connection.

1.5 This is particularly important given 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 and traditionally low paid. These workers, especially young people, are being priced out of the housing market in the landscapes and communities that depend on them.

¹ Section 82 of the Countryside and Rights of Way Act 2000

² Defra (2019) *Areas of Outstanding Natural Beauty: technical support scheme (England) 2019 to 2020*
Planning Policy Wales Edition 11 (2021) - Section 6.3.7

1.6 As such, provision of affordable housing that meets the needs of local communities, including provision of housing that is affordable in perpetuity, should be a high priority in the Wye Valley AONB.

1.7 For these reasons, this position statement advocates two over-arching principles for housing development within the Wye Valley AONB and its setting:

- Housing development within the Wye Valley AONB and, where relevant, in its setting, should be 'landscape-led'.
- Housing development within the Wye Valley AONB should be prioritised for local need arising within the AONB.

1.8 Key recommendations relating to the 'landscape-led' approach to housing are provided in the Wye Valley AONB Partnership's Position Statement on Landscape-Led Development. 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.

1.9 With regards to best practice, this Position Statement has been modelled significantly on the approaches adopted by several nationally designated Protected Landscapes, including the Cotswold National Landscape's Housing Position Statement and also the South Downs Local Plan, West Oxfordshire Local Plans, Arnside & Silverdale AONB Development Plan, and the New Forest National Park Local Plan. The Appendix document to this Position Statement provides relevant case studies of these.

2.0 PURPOSE OF THE POSITION STATEMENT

2.1 The primary purpose of Wye Valley AONB Partnership's Position Statements are to expand on relevant policies and Strategic Objectives in the current Wye Valley AONB Management Plan. They provide further context, guidance and recommendations in relation to specific policies and associated issues. They do not create new policies.

2.2 The Wye Valley AONB Partnerships' 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 the AONB designation;
- to ensure that the purpose of AONB designation is not compromised by development and that the natural beauty of the Wye Valley AONB is conserved and enhanced;
- to fulfil the requirements of the National Planning Policy Framework (NPPF), Planning Policy Wales (PPW), Planning Practice Guidance (or, where relevant, National Policy Statements), and Technical Advice Notes, 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 Partnership;
- to emulate best practice in the Wye Valley AONB and other Protected Landscapes;
- to develop a consistent and coordinated approach to relevant issues across the whole of the Wye Valley AONB and its setting³.

2.3 With regards to housing need and affordable housing, the most relevant strategic objectives of the Wye Valley AONB Management Plan 2021-2026 are WV-D2, WV-D3 and WV-C3.

3.0 STATUS OF THE POSITION STATEMENT

3.1 Position Statements are supplementary and subsidiary to the Wye Valley AONB Management Plan. For development proposals to be compatible with the AONB Management Plan, they should also be compatible with the relevant position statements.

3.2 The AONB Management Plan is a material consideration in planning decision-making. However, we acknowledge that, in a plan-led planning system, it is the policies of the relevant adopted local authority development plan that have the greatest weight. As such, within this planning system, the hierarchy of development plans, AONB Management Plan and position statements is as follows⁴:

- Local authority development plan and neighbourhood development plans (NDPs are applicable to England only)
- AONB Management Plan.
- Position statements.

4.0 ACHIEVING THE RIGHT BALANCE

4.1 The Wye Valley AONB Partnership recognises that achieving the right balance, in terms of the quantum and type of housing that should be delivered in the Wye Valley AONB and its setting, is a difficult challenge for local authorities, especially where a significant proportion of their area lies within the AONB.

³ Four local authority areas overlap with the Wye Valley AONB, with each with local authority having its own development plan.

⁴ In England, Section 38(6) of the Planning and Compulsory Purchase Act 2004 states: “If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.” The National Planning Policy Framework is itself a significant material consideration, although it is acknowledged regarding the presumption in favour of sustainable development under Paragraph 11, particularly in relation to plan-making and decision-making.

In Wales, national planning guidance prepared by the Welsh Government, is taken into account as a material planning consideration.

4.2 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 are developed.

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

4.4 However, we hope this position statement will help to ensure that the right balance is achieved across the Wye Valley AONB, 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 of local communities within the AONB.

5.0 LOCAL NEED & AFFORDABLE HOUSING

5.1 Housing Need v Housing Requirements

5.1.1 The first step in the process of deciding how many homes need to be planned for in an area is to assess housing need. 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 circumstances⁵. Planning Policy Wales sets out that planning authorities, in partnership with the community, including the private sector, must develop policies to meet the challenges and particular circumstances evident in their areas. Alternative approaches can also be considered in exceptional circumstances⁶.

5.1.2 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 area⁷. In contrast, establishing the 'housing requirement' for an area requires consideration of 'constraints'⁸, including the AONB designation.

5.1.3 There is clear distinction between 'housing need' and 'housing requirement'.

5.1.4 AONBs face a challenge nevertheless, as the standard method figure is based on the local authority area as a whole rather than on the AONB area. Development

⁵ Paragraph 61 of the NPPF 2021

⁶ Paragraph 4.2.9 of Planning Policy Wales Edition 11 (2021). Local Housing Market Assessment Guide, Welsh Assembly Government 2006 and Getting started with your Local Housing Market Assessment – A step-by-step guide, Welsh Government 2014.

⁷ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>. Paragraph 001. Local Housing Market Assessment Guide, Welsh Assembly Government 2006 and Getting started with your Local Housing Market Assessment – A step-by-step guide, Welsh Government 2014

⁸ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Including paragraphs 002, 010, 012, 013, 014, 015, 018, 021 and 025. Paragraph 4.2.9 of Planning Policy Wales Edition 11 (2021)

plan consultation documents give 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 Wye Valley AONB.

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

5.1.6 The recommendations outlined in the Wye Valley AONB Partnership's Landscape-led Development Position Statement are an important consideration in this process⁹.

5.1.7 Recommendations

- The housing need figure identified using the UK Government and Welsh Government 'standard method' should not be presented as a 'target' for housing provision.
- Recommendations outlined in the Wye Valley AONB Partnership's Landscape-led Development Position Statement should be an important consideration when assessing housing and economic land availability.
- It should be recognised that national planning policies 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.

5.2 Insufficient Sites/Broad Locations to Meet Needs

5.2.1 If objectively assessed needs cannot be met in full, factoring in constraints, 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 examination¹⁰.

5.2.2 Recommendation

⁹ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041

¹⁰ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Paragraph 025.
Paragraph 4.2.9 of Planning Policy Wales Edition 11 (2021)

- 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.

5.3 Accommodating Unmet Needs, arising elsewhere, within the Wye Valley AONB

5.3.1 Three local planning authorities overlap the Wye Valley AONB – Herefordshire Council, Monmouthshire County Council and the Forest of Dean District Council.¹¹ As well as meeting their own housing needs, all three local authority areas are required (through the duty to cooperate and statements of common ground) 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 planning authority area that overlaps with the Wye Valley AONB.

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

5.3.3 However, Government guidance makes it clear that AONBs *‘are unlikely to be suitable areas for accommodating unmet needs arising from adjoining (non-designated) areas’*¹².

5.3.4 As such, the Wye Valley AONB is unlikely to be a suitable area for accommodating unmet needs from local planning authority areas that do not overlap with the AONB even if the overlapping local authorities do have to accommodate unmet need. The same principle should apply for unmet needs arising from developed areas that are adjacent to an AONB and which are in the same local planning authority area as the AONB. It is unlikely that it would be appropriate to extend the built environment of adjacent settlements into the AONB.

5.3.5 It may be appropriate to apply the requirements of paragraph 177 of the NPPF (England) and Paragraph 6.3.10 of PPW (Wales), relating to major development, in this regard.

5.3.6 Recommendations

¹¹ Gloucestershire County Council is the fourth local planning authority covering the Wye Valley AONB. Gloucestershire is a two-tier county, the County Council is responsible for planning applications related to mineral working and associated development, and the disposal of waste, whereas domestic planning applications are determined by Forest of Dean District Council.

¹² <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041. See also Paragraph 4.2.9 of Planning Policy Wales Edition 11 (2021)

- Where a local planning authority area that overlaps the Wye Valley AONB is required to accommodate unmet needs from neighbouring local authorities (including as part of a joint plan), this unmet need should not be factored into housing provision in the Wye Valley AONB at either plan-making or decision-making stages. *
- Housing developments that would extend into the Wye Valley AONB, the built environment of settlements adjacent to the AONB should not be allocated or permitted. *

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

5.4 Affordable Housing

5.4.1 Strategic Objective WV-C3 of the Wye Valley AONB Management Plan 2021-2026, supports the development of affordable housing appropriate to local need in the AONB.

5.4.2 There are several reasons for prioritising the provision of affordable housing in the Wye Valley AONB. For example, the outstanding natural beauty of the Wye Valley AONB makes it a desirable place to live. As a result, housing may be more expensive and less affordable than in areas outside the AONB.

5.4.3 UK Government guidance recognises that National Parks, at least, '*are not suitable locations for unrestricted housing*'¹³. Similarly, the UK Government's Planning White Paper (2020) states that '*the whole purpose of National Parks would be undermined by multiple large scale housing developments*'¹⁴. 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'¹⁵.

5.4.4 AONBs have the same level of protection as National Parks, with regards to conserving and enhancing landscape and scenic beauty. The scale and extent of development in AONBs (as with National Parks) should be limited¹⁶. As such, it is logical to apply the same principles, outlined above for National Parks, in AONBs as well.

¹³ Defra (2010) English National Parks and the Broads – UK Government Vision and Circular 2010. Para 78.

¹⁴ Ministry of Housing Communities and Local Government (2020) White Paper: Planning for the Future. Para 2.25.

¹⁵ Defra (2010) English National Parks and the Broads – UK Government Vision and Circular 2010. Para 78.

¹⁶ Paragraph 176 of the NPPF 2021

5.4.5 The need to provide more affordable housing is also addressed in the proposals of the UK Government-commissioned Landscape Review Final Report (commonly referred to as the Glover Review / Report)¹⁷.

5.4.6 Recommendation

- Housing provision in the Wye Valley AONB should be focused on – and prioritise – meeting affordable housing requirements.

5.5 Affordable in Perpetuity

5.5.1 The term ‘affordable housing’ covers 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 not¹⁸.

5.5.2 UK Government guidance for National Parks specifies that National Park Authorities should work to ‘*ensure that ... affordable housing remains so in the longer term*’¹⁹. The Landscapes Review Final Report reiterates this, stating that ‘*National Parks, as planning authorities, should consider using their powers to set conditions on new housing to ensure it remains affordable*’²⁰. 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 a particular priority.

5.5.3 As explained in the ‘Affordable Housing’ section, above, given 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.

5.5.4 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, disproportionately 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.

5.5.5 The Wye Valley AONB Partnership acknowledges that the UK Government and Welsh Government set certain requirements on the types of affordable housing that

¹⁷ Defra (2019) Landscapes Review Final Report). Proposal 18: A new National Landscapes Housing Association to build affordable homes.

¹⁸ Annex 2: Glossary of the NPPF 2021 provides a helpful definition for affordable housing, as well as Local Housing Market Assessment Guide, Welsh Assembly Government 2006; and Getting started with your Local Housing Market Assessment – A step-by-step guide, Welsh Government 2014 <https://gov.wales/local-housing-market-assessment-guidance-local-authorities>

¹⁹ Defra (2010) English National Parks and the Broads – UK Government Vision and Circular 2010. Para 79.

See also 4.2.29 of Planning Policy Wales Edition 11 (2021)

²⁰ Defra (2019) Landscapes Review Final Report. Supporting text for Proposal 18: A new National Landscapes Housing Association to build affordable homes.

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 remains scope to prioritise and set conditions for housing that is affordable in perpetuity.

5.5.6 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.

5.6 Local Connection

5.6.1 In the Wye Valley AONB, there are three 'choice-based lettings' (CBL) schemes that allow applicants to search, apply and bid for social rented properties in their own local authority area – Home Point in Herefordshire, Homeseeker Plus in the Forest of Dean district and Homesearch in Monmouthshire.

5.6.2 All three schemes operating within the Wye Valley AONB include some condition for local connection (usually to the local authority area)²¹. Additional local connection criteria may then also be applied for properties in rural villages where there can be shortages of housing sites with planning conditions, however the approach is inconsistent between the schemes.

5.6.3 The Wye Valley AONB Partnership supports the priority given to local connection in CBL 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 Wye Valley AONB, from applicants that do not have a local connection), and is compatible with the Partnership's duty to foster the social well-being of local communities within the AONB.

5.6.4 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.

5.6.5 Recommendation

- The local connection requirement of Choice-Based Letting (CBL) schemes should be applied consistently across the Wye Valley AONB.

²¹ Section 199 of the Housing Act 1996 specifies that someone has a local connection with the district of a local authority housing authority if they have a connection with it: a) because they are, or in the past were, normally resident there, and that residence is or was of their own choice; b) because they are employed there, c) because of family associations, or d) because of special circumstances.

See also 10.16 of TAN2 – Planning and Affordable Housing (2006)

5.7 Affordable Housing Provision

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

5.7.2 In many Protected Landscapes nationally:

- 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)²²;
- provision of affordable housing is sought for residential developments of 5 units or fewer²³.

5.7.3 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 dwellings²⁴.

5.7.4 The Wye Valley AONB Partnership supports these measures for several 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 need²⁵. This, in turn, would help to ensure that the scale and extent of development in the AONB is limited, as required in paragraph 176 of the NPPF and Paragraph 6.3.5 of PPW. The higher price tag associated with housing in Protected Landscapes is another factor in justifying a higher percentage of affordable housing in these areas.

5.7.5 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'²⁶.

²² The Partnership is aware of RES permitted for development in the Wye Valley AONB with the percentage of affordable housing as low as 50%. We consider this to be closer to the level that should be provided in market housing schemes. This level 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.

²³ This makes use of the provision in paragraph 64 of the NPPF, which allows for affordable housing to be required in residential developments of 5 units or fewer in designated rural areas. See also 10.13 of TAN2 – Planning and Affordable Housing (2006) which advises that local plans may locally define small rural exception sites.

²⁴ 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. Policy AS03 – Housing Provision.

²⁵ For example, the affordable housing need identified in rural housing need surveys.

²⁶ Defra (2019) Landscapes Review Final Report. Proposal 18: A new National Landscapes Housing Association to build affordable homes.

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

5.7.7 Recommendations:

- At plan-making stage, when reviewing local and/or neighbourhood plans, the plan-making body should give consideration to setting policies for affordable housing provision in the Wye Valley AONB 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%;
 - On-site affordable housing provision for housing developments of five units or fewer.

5.8 Evidence Of Local Need Arising Within The Wye Valley AONB

5.8.1 As outlined earlier in this position statement, we acknowledge that the 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 or even individual settlements.

5.8.2 Within this process, we encourage local authorities and other stakeholders to have regard to Strategic Objective WV-C3 of the Wye Valley AONB Management Plan 2021-2026, which supports the development of affordable housing appropriate to local need in the AONB. Given WV-C3 prioritises affordable housing, priority should be given to the provision of affordable housing. A key consideration, in this context, is whether there is robust evidence of local affordable housing need arising from within the Wye Valley AONB.

5.8.3 Within this context, we consider that robust evidence of local affordable housing need arising from within the Wye Valley AONB includes:

- an up-to-date (rural) housing needs survey for the parish where housing is being considered²⁷;

²⁷ Ideally, where a parish overlaps with the boundary of the Wye Valley AONB, there should be some consideration of the extent to which the identified need arises within, or outside, the AONB (at least when the data is being applied to a particular housing proposal). See also the guidance and recommendations in this position statement relating to needs arising in adjacent, non-designated areas.

- 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 the relevant Neighbourhood Development Plan.

5.8.4 It is acknowledged that the evidence of housing need produced should only be based on data which is specific to the individual local authority and the different approaches to housing need analysis and CBL Schemes between the authorities. This issue is particularly relevant in the absence of a spatial housing strategy for the Wye Valley AONB as a whole. Consequently, when evidence of housing need is being considered within the Wye Valley AONB, and which extends beyond a particular settlement, it therefore remains limited to the relevant local planning authority.

5.8.5 Recommendations

- At the plan-making stage, plan-making bodies should have regard to robust evidence of affordable housing need arising within the Wye Valley AONB (as defined above) when assessing potential housing allocations.
- At the development management stage, housing development proposals:
 - Within the settlement boundary, should have regard to robust evidence of affordable housing need arising within the Wye Valley AONB (as defined above);
 - Outside the settlement boundary, or equivalent, should be based on robust evidence of affordable housing need arising within the Wye Valley AONB (as defined above).

5.9 RURAL HOUSING NEED SURVEYS

5.9.1 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 out-of-date (i.e. more than five years old). Without this evidence base, more weight is likely to be given to the unitary or district-wide housing requirement figure (or even the housing need figure), which could potentially result in a larger number of houses being built.

5.9.2 Given that the provision of affordable housing that meets local needs is a key priority in the Wye Valley AONB, it may be appropriate to prioritise HNS in the AONB.

5.9.3 Recommendations

- Housing need surveys should be kept up-to-date, particularly for parishes within the Wye Valley AONB where housing is likely to be allocated (for example, settlement higher up the settlement hierarchy) and/or, where there

is strong developer interest in new residential development. Ideally, this should be done on a five-year rolling programme.

5.10 CHOICE BASED LETTINGS SYSTEMS

5.10.1 As outlined above, data from the three choice-based lettings systems (CBL) – Home Point, Homesearch and Homeseeker Plus - used by the local authorities whose areas overlap the Wye Valley AONB, form an important part of the evidence base for potential housing developments. However, there are acknowledged limitations in these systems regarding the data held, and this enables – albeit inadvertently - potential misinterpretation to present inflated affordable housing need figures. For example, they may not capture a homeseeker's preference to remain or live in a particular parish. i.e. the registrant has noted simply that they live in the parish and wish to move. It may also fail to identify applicants who may have already moved or who no longer have a housing need.

5.10.2 CBL system data should not be used explicitly as a measure of affordable housing need. It may be more appropriate to cross-reference this data first with other evidence of affordable housing need, such as housing needs survey data.

5.10.3 The flowchart in Appendix 3, provides an illustration of the type of analysis that should be applied to data extracted from a CBL scheme register for it to provide effective evidence reports for use in decision-making.

5.10.4 Recommendation

- Data from choice-based lettings systems 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.

5.11 SECOND HOMES

5.11.1 Second home ownership and buy to let can remove housing from the open market that could otherwise be made available to first-time homeowners. The resulting increased demand within a reduced pool of housing stock can inflate house prices, worsening affordability. This issue can be particularly challenging in protected landscapes, like the Wye Valley AONB, 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 Landscapes 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' housing²⁸.

5.11.2 Recommendation

- When plan-making bodies are reviewing their development 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.

6.0 LOCATION & DESIGN

6.1 Context

6.1.1 The UK 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'²⁹. 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'³⁰. Development that is "good enough to approve" should demonstrate convincing evidence of local need, prioritise affordable housing and follow the Welsh Government's 'Design' Technical Advice Note (TAN) 12 (2016).

6.2 Location

6.2.1 As outlined in the Wye Valley AONB Partnership's 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.

6.2.2 Another key consideration is locating new housing development close to essential services and facilities, 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'.

6.2.3 Recommendations

²⁸ https://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0027/257751/Part-6-Achieving-a-Thriving-Community.pdf. Page 153.

²⁹ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

³⁰ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

- New residential development 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 residential development being proposed.
- The location of new residential development should be consistent with the 'settlement hierarchy' approach, whereby housing is targeted towards settlements that have a good level of services and facilities and locations that facilitate opportunities to access them by a range of active travel measures, reducing dependency on car use.

6.3 DESIGN

6.3.1 The value of the Wye Valley AONB landscape relies in part on the standard and character of the buildings within it. It is therefore the responsibility of all potential developers to ensure that each development adds value to the Wye Valley AONB landscape through good design. This contributes to the enhancement of the natural beauty and sense of place. Several of the Features and Special Qualities³¹ of the Wye Valley AONB relate directly to the design of housing, including:

- Distinctive 'villagescapes', including conservation areas, listed buildings and local features, that define a 'sense of place' in the settlements.
- Rural character and scale of settlements contribute to local distinctiveness, landscape character and sense of tranquillity.
- High-quality built environment characterised by numerous distinctive features, such as settlement patterns, landmark buildings, garden layouts, boundary elements and planting traditions
- There is no single building style, type of material or pattern of development in the AONB, reflecting the varying geology and topography. This creates a range of styles that give character and distinctiveness to different parts of the area. Lack of attention to details can harm the Special Qualities of the AONB and diminish the distinctiveness of its built heritage.
- Listed buildings and Conservation areas.

6.3.2 The Special Qualities are reflected in numerous Strategic Objectives within the Wye Valley AONB Management Plan 2021-2026.

6.3.3 To sustain the area's natural beauty, it is important to ensure that future development is locally characteristic and distinctive, in terms of its design, siting and the materials used. There are many different styles of building that give character and distinctiveness to different parts of the area. Lack of attention to issues such as local design, layout, scale and materials can harm the Special Qualities of the AONB and diminish the distinctiveness of the built environment. The loss of specimen trees, stone

³¹ See Statement of Significance, Vision and Tables 2 & 8 of the Wye Valley AONB Management Plan 2021-2026 for more information on relevant Features and Special Qualities.

walls, hedgerows and other landscape elements associated with development can also degrade local character and distinctiveness.

6.3.4 A key reference point for the design of new residential development is the design guides / guidance published by the local planning authorities, sometimes as part of the local authority development plan. There is not, currently, one over-arching design guide for the whole of the Wye Valley AONB.

6.3.6 An increasingly important consideration will be the extent to which new residential development incorporates energy conservation and renewable energy measures, such as solar panels and air source heat pump, 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 Wye Valley AONB.

6.3.7 Recommendations

- New residential developments in the Wye Valley AONB should:
 - Respect the locally distinctive characteristics of the existing settlement;
 - Respect the relevant Special Qualities of the Wye Valley AONB;
 - Be consistent with relevant policies of the Wye Valley AONB Management Plan;
 - Facilitate opportunities for people to travel and access services by a range of transport modes, reducing dependency on car use.
- New affordable housing should be indistinguishable from open market housing in terms of both character and design quality; and should be fully integrated into the village fabric.

7.0 SUPPORTING INFORMATION

7.1 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 UK Government's guidance on 'Housing and Economic Land Availability Assessment' (Appendix 1).
- Case studies of best-practice (Appendix 2).
- A flowchart illustrating the extent to which CBL data equates to convincing evidence of need within a specific settlement (Appendix 3).