

MALVERN HILLS AONB JOINT ADVISORY COMMITTEE

POSITION STATEMENT 2: HOUSING DEVELOPMENT IN THE MALVERN HILLS AONB AND ITS SETTING

1.0 CONTEXT

1.1 The Malvern Hills Area of Outstanding Natural Beauty (MH 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 its designation is to conserve and enhance the natural beauty of the area².

1.2 The MH 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 MH AONB plays an important role in achieving these aspirations.

1.3 However, as outlined in the MH AONB 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.

1.4 The outstanding natural beauty of the MH AONB 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 people with a local connection.

1.5 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 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*

1.6 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 Malvern Hills AONB.

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

- Housing development within the MH AONB and, where relevant, in its setting, should be 'landscape-led'.
- Housing development within the MH 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 Malvern Hills AONB Partnership's 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.

1.9 With regards to best practice, this position statement has been modelled significantly on the Cotswold National Landscape's Housing Position Statement and inspired by their Management Plan 2023-2025. It is also inspired by the approaches adopted in 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 the MH AONB Partnership's position statements is to expand on relevant policies in the current MH AONB Management Plan. They provide further context, guidance and recommendations in relation to specific policies and associated issues. They are not intended to create new policies.

2.2 The MH AONB Partnership'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 MH AONB 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 Partnership;

- to emulate best practice in the MH AONB and other protected landscapes;
- to develop a consistent and coordinated approach to relevant issues across the whole of the MH AONB and its setting³.

2.3 With regards to housing need and affordable housing, the most relevant policy is Policy BDP3: *Development in the AONB should be based on convincing evidence of local need. Priority should be given to the provision of affordable housing and enhancing local services.*

3.0 STATUS OF THE POSITION STATEMENT

3.1 The Partnership's position statements are supplementary – and subsidiary - to the Malvern Hills AONB Management Plan. However, it is worth noting that Policy BDP2 in the MH AONB 2019-2024 states that “development in the AONB and its setting should be in accordance with good practice guidance including that produced by the AONB Partnership”. As such, 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 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 adopted 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:

- Local authority development plan.
- AONB Management Plan.
- Position statements.

4.0 ACHIEVING THE RIGHT BALANCE

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

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 of these sites are developed over time.

³ Three local authority areas overlap with the MH AONB, with each with local authority having its own development plan. One of these local authorities (Malvern Hills) produces its development plan jointly with Worcester City and Wychavon in the form of a single local plan for South Worcestershire Councils.

4.3 We also recognise that there may be exceptional circumstances in which major housing developments are permitted in the MH 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 that this position statement will help to ensure that the right balance is achieved across the MH 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 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 circumstances⁴.

5.1.2 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 area⁵. In contrast, establishing the 'housing requirement' for an area requires consideration of 'constraints'⁶, including the AONB designation.

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

5.1.4 AONBs face a challenge however, as the standard method figure is based on the local authority area as a whole rather than on the AONB area and development plan consultation documents sometimes 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 MH AONB.

5.1.5 The Ministerial Statement released in December 2022 announced a review and updates to the NPPF in order to better enable local authorities, working with their communities, to determine how many homes can actually be built, taking into account what should be protected in each area. Proposed changes have now been consulted on and a final report is awaited.

5.1.6 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'.

⁴ Paragraph 61 of the NPPF 2021

⁵ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>. Paragraph 001.

⁶ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Including paragraphs 002, 010, 012, 013, 014, 015, 018, 021 and 025.

5.1.7 The recommendations outlined in the MH AONB Partnership's Landscape-led Development Position Statement are an important consideration in this process⁷.

5.1.8 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 Partnership'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.

5.2 Insufficient Sites/Broad Locations to Meet Needs

5.2.1 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 examination⁸.

5.2.2 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.

5.3 Accommodating Unmet Needs, arising elsewhere, within the Malvern Hills AONB

5.3.1 Three local planning authority areas overlap with the MH AONB – Herefordshire Council, Malvern Hills District Council and the Forest of Dean District Council⁹. As well as meeting their own housing needs, all three local authority areas are required (through

⁷ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041

⁸ <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>. Paragraph 025.

⁹ This is further complicated in the case of Malvern Hills District Council as its development (local) plan is prepared jointly with Worcester City and Wychavon Councils and presented as a single plan for South Worcestershire – the South Worcestershire Development Plan (SWDP).

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 authority area that overlaps with the MH AONB. .

5.3.2 Within the local authority areas that overlap with the MH 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'*¹⁰.

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

5.3.5 The Government guidance does not define 'unlikely' in this context. It may be appropriate to apply the requirements of paragraph 177 of the NPPF, relating to major development, in this regard.

5.3.6 Recommendations:

- Where a local authority area that overlaps with the MH AONB is required to accommodate unmet needs from neighbouring local authorities (including as part of a joint plan, such as the SWDP), this unmet need should not be factored into housing provision in the MH AONB at either the plan-making stage or development management stage.*
- Housing developments that would extend, into the MH 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 As outlined above, Policy BDP3 of the MH AONB Management Plan 2019-2024 states that 'priority should be given to the provision of affordable housing'.

¹⁰ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041

5.4.2 There are a number of reasons for prioritising the provision of affordable housing in the MH AONB. For example, as outlined above, the outstanding natural beauty of the MH 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 Government guidance recognises that National Parks, at least, 'are not suitable locations for unrestricted housing'¹¹. 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'¹². 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'¹³.

5.4.4 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 limited¹⁴. As such, it is logical to apply the same principles, outlined above for National Parks, in AONBs as well.

5.4.5 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)¹⁵.

5.4.6 Recommendations:

- Housing provision in the MH AONB should be focussed 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 not¹⁶.

5.5.2 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*'¹⁷. The Landscapes Review Final Report reiterates this point, stating that '*National Parks, as planning authorities, should consider using their powers to set*

¹¹ Defra (2010) English National Parks and the Broads – UK Government Vision and Circular 2010. Para 78.

¹² Ministry of Housing Communities and Local Government (2020) White Paper: Planning for the Future. Para 2.25.

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

¹⁴ Paragraph 176 of the NPPF 2021

¹⁵ Defra (2019) Landscapes Review Final Report). Proposal 18: A new National Landscapes Housing Association to build affordable homes.

¹⁶ Annex 2: Glossary of the NPPF 2021 provides a helpful definition for affordable housing

¹⁷ Defra (2010) English National Parks and the Broads – UK Government Vision and Circular 2010. Para 79.

*conditions on new housing to ensure it remains affordable*¹⁸. 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.

5.5.3 As explained in the 'Affordable Housing' section, above, 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.

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 MH AONB Partnership 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.

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 MH 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, Housing for You in the Malvern Hills council area and Homeseeker Plus in the Forest of Dean district.

5.6.2 All three schemes operating within the MH AONB include some condition for local connection (usually to the local authority area)¹⁹. 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.

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

¹⁹ 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.

5.6.3 The MH 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 MH AONB, from applicants that do not have a local connection);
- 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 CBL schemes should be applied consistently across the MH AONB.

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)²⁰;
- provision of affordable housing is sought for residential developments of 5 units or fewer²¹.

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 dwellings²².

5.7.4 The MH AONB Partnership supports these measures for a number of reasons. For example, having a high percentage of affordable housing will reduce the total number of

²⁰ The Partnership is aware of RES permitted for development in the MH 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.

²¹ 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.

²² 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.

houses that need to be built to meet locally identified affordable housing need²³. This, in turn, would help to ensure that the scale and extent of development in AONB is limited, as required in paragraph 176 of the NPPF. The higher price tag associated with housing in protected landscapes is another factor in justifying a high / 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'²⁴.

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 MH 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 Malvern Hills AONB

5.8.1 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 or even individual settlements.

5.8.2 Within this process, we encourage local authorities and other stakeholders to have regard to Policy BDP3 of the MH AONB Management Plan 2019-2024, at both the plan-making stage and the development management stage. Policy BDP3 states that "Development in the AONB should be based on convincing evidence of local need". Given that Policy BDP3 also 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 MH AONB.

²³ For example, the affordable housing need identified in rural housing need surveys.

²⁴ Defra (2019) Landscapes Review Final Report. Proposal 18: A new National Landscapes Housing Association to build affordable homes.

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

- an up-to-date (rural) housing needs survey for the parish where housing is being considered²⁵;
- 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 Where evidence of need arising within the wider MH AONB is being considered (i.e. beyond the level of the individual settlement / parish), this should be limited to the section of the MH AONB that lies within the relevant local authority area. In other words, it should not include evidence of need arising within the MH AONB in other local authority areas²⁶.

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 MH 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 MH AONB (as defined above);
 - outside the settlement boundary, or equivalent, should be based on robust evidence of affordable housing need arising within the MH 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 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.

²⁵ Ideally, where a parish overlaps with the boundary of the MH 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.

²⁶ It also makes sense for the evidence of need not to extend beyond the relevant authority area, given that evidence of housing need is normally based on data 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 MH AONB as a whole. Please also refer to the guidance and recommendations in this position statement relating to unmet needs arising in other local authority areas.

5.9.2 Given that the provision of affordable housing that meets local needs is a key priority in the MH 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 MH AONB 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.

5.10 CHOICE BASED LETTINGS SYSTEMS

5.10.1 As outlined above, data from the three choice-based lettings systems (CBL) – Home Point, Housing for You and Homeseeker Plus - used by the three local authorities whose areas overlap with the MH AONB, form an important part of the evidence base for potential housing developments. However, there are acknowledged limitations in these systems with regard to the data held, and this enables – albeit inadvertently - potential misinterpretation to present inflated affordable housing need figures. For example, Housing for You currently doesn't 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. We also understand that it may also fail to identify applicants who may have already moved or who no longer have a housing need. CBL system data should therefore 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.

5.10.2 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.

5.10.3 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 market that could otherwise be made available to first home owners, and the resulting increased demand within a reduced pool of housing stock can inflate house prices and worsen affordability. This issue can be particularly challenging in protected landscapes, such as the MH 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 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' housing²⁷.

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 principle residence rather than as a second home or holiday home.

6.0 LOCATION & DESIGN

6.1 Context

6.1.1 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'²⁸. 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'²⁹.

6.2 Location

6.2.1 As outlined in the Malvern Hills 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, 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'.

6.2.3 A checklist of key principles and matters for consideration to encourage good development within the MH AONB and its setting, which includes those relevant for location and siting, can be found in the draft MH AONB Guidance on the Key Principles of Good Development.

²⁷ https://www.exmoor-nationalpark.gov.uk/__data/assets/pdf_file/0027/257751/Part-6-Achieving-a-Thriving-Community.pdf. Page 153.

²⁸ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

²⁹ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

6.2.4 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.
- New housing should be sited in locations that facilitate opportunities for people to travel and access services by a range of transport modes, reducing dependency on car use.

6.3 DESIGN

6.3.1 The value of the MH 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 MH AONB landscape through good design. Several of the special features and qualities³⁰ of the MH AONB relate directly to the design of housing, including:

- Distinctive 'villagescapes', including conservation areas, listed buildings and local features, that define a 'spirit 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. There are 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.
- The use of locally distinctive building materials and colour palette.
- Listed buildings, including Eastnor Castle, Bromesberrow Place and Little Malvern Priory, as well as listed headstones and chest tombs; and gas lamps.
- Conservation areas – including Malvern Wells, Eastnor, Colwall and part of Cradley.
- Victorian villas of Malvern (Malvern stone and render).
- Half-timbered buildings, especially in the west of the AONB

³⁰ See Introduction and Chapter 7 of the Malvern Hills AONB Management Plan 2019-2024 for more information on relevant special features and 'special qualities', and also the MH AONB guidance documents on Building Design and on Selection and Use of Colour in Development.

6.3.2 These special qualities are reflected in the following policies from the MH AONB Management Plan 2019-2024:

- LWP4: *Support the provision of a variety of housing that is appropriate to the character of the area and meets local community needs.*
- BDP2: *Development in the AONB and its setting should be in accordance with good practice guidance including that produced by the AONB Partnership*

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 walls, hedgerows and other landscape elements associated with development can also degrade local character and distinctiveness. The AONB Partnership has produced guidance on building design to show how new development can make a positive contribution to the natural beauty of the AONB .

6.3.4 In addition, the MH AONB Partnership's *Landscape Strategy and Guidelines* and also its *Guidance on how development can respect Landscape in Views* provide guidance on the potential landscape implications of housing developments and how potential adverse impacts can potentially be avoided and / or minimised.

6.3.5 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 Malvern Hills AONB.

6.3.6 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 MH AONB

6.3.7 Recommendations:

- New housing developments in the MH AONB should:
 - respect the locally distinctive characteristics of the existing settlement;
 - respect the relevant 'special qualities' of the MH AONB;
 - be consistent with relevant policies of the MH AONB Management Plan;
 - be consistent with MH AONB guidance, including but not limited to its *Landscape Strategy and Guidelines; Guidance on how Development can respect Landscape in Views; Guidance on Building Design; Guidance on the Selection and Use of Colour in Development; and its Guidance on Lighting*.
 - 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 market housing in 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 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).
- A sample extract from the draft MH AONB Guidance on the Key Principles of Good Development

Specific Contact Points for this report

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