



NORTH WESSEX DOWNS AONB POSITION STATEMENT

HOUSING



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The purpose behind this Position Statement is to inform local planning authorities, landowners, applicants and other interested parties of the AONB Unit's position regarding the provision of new housing within, or likely to affect, the North Wessex Downs AONB or its setting. This document is intended to guide policy makers, to assist in the preparation of planning applications and to assist in the decision making process. The Position Statement has been prepared in consultation with and approved by the North Wessex Downs AONB Management Working Group and the Council of Partners including all the constituent Local Authorities. This guidance forms an extension of the principles laid out within the North Wessex Downs AONB Management Plan (2009-2014). The Position Statement provides the North Wessex Downs AONB view on housing development proposals based on existing planning policy. The primary purpose of AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the *Countryside and Rights of Way Act 2000* (CRoW Act). Within Section 85 of the CRoW Act 2000 there is a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in AONBs. This Position Statement was first approved on 13th March 2012 by the North Wessex Downs AONB Council of Partners, however following the publication of the National Planning Policy Framework (NPPF) on March 27th 2012 this Position Statement has been amended accordingly.

Planning for Housing

1. Areas of Outstanding Natural Beauty (AONBs) are designated by the Government for the purpose of ensuring that the special qualities of the finest landscapes in England, Wales and Northern Ireland are conserved and enhanced. The North Wessex Downs AONB was designated in 1972 and following the CRoW Act the North Wessex Downs AONB Partnership was formed to ensure the conservation and enhancement of the natural beauty of the AONB and increase awareness and understanding of the special qualities of the AONB. The special qualities of the landscape and broad measures to seek protection of them are set out in the statutory *North Wessex Downs AONB Management Plan 2009-2014*.

2. The following Position Statement concerns the use of land to meet pressures for growth of housing in or near the North Wessex Downs AONB including affordable and open-market housing and with reference to both housing allocated through the development plan process and individual planning applications. This is a living and working landscape and new accommodation may be needed to meet specific local needs in specific locations. A shortage of suitable and generally affordable housing, particularly in this largely rural environment, will not help secure a sustainable future. However, it is essential that the primary purpose of AONB designation remains paramount in the decision making process. It is not, for instance, considered appropriate that the AONB should be used as a location to site significant strategic housing allocations which go beyond the identified local housing needs appropriate for the AONB and where such development results in landscape harm and loss of character.

Background

3. The North Wessex Downs AONB covers 668 square miles / 1,730 sq km (the third largest AONB nationally) but has a population of only 125,000 people. Hungerford and Marlborough are the two largest settlements, with a combined population of 14,000. Each

town and village has its own distinct character derived from topography, geology, the settlement pattern, local architecture and history. The North Wessex Downs AONB is one of the most expansive, open and relatively remote AONBs in the south of England. Its natural beauty largely emerges from the characteristic open downland landscapes, with long views of beautiful landscapes, with little visual or noise disturbance to their tranquillity. As such, the AONB is particularly sensitive to developments that are visually prominent, that results in an urbanising influence, result in loss of amenity or generate significant levels of traffic. This is a highly pressured and very fragile environment where inappropriate development can have a disproportionate effect on character.

4. The AONB is surrounded by the significant urban centres of Reading, Newbury, Basingstoke, Andover, Swindon and Didcot, together with the smaller though still significant settlements of Wantage and Grove, Wallingford, Thatcham, Devizes, Calne and Ludgershall collectively providing a population of over 1.2 million within 20 minutes drive of the AONB. It is crossed east-west by the M4 and north-south by the A34. The position of the North Wessex Downs AONB Unit is that these major settlements should be the starting point when considering strategic housing allocation locations in line with national and local government policy.

5. Issues may still arise for the North Wessex Downs from these major centres in terms of large-scale urban extensions within the setting of the AONB. Further to this the North Wessex Downs AONB by its very nature is a very attractive environment for people to seek to live, which can result in a demand that may distort local housing need, affordability and supply. Landscape character can be eroded by inappropriate infilling in villages and by housing estates on the edges of towns and villages attempting to meet this demand. Whilst such developments may not individually have been of sufficient magnitude to cause significant landscape damage or increases in traffic in the AONB as a whole, the cumulative effect has in many cases been harmful.

6. The purpose of this Position Statement is therefore to highlight the need for extreme care by local authorities and developers in considering potential housing need, allocations, sites and applications within the North Wessex Downs AONB. A distinct approach is required that respects and supports the area's status as a nationally designated protected landscape. This approach needs to be based on the rigorous assessment of identified local housing need and the capacity of the landscape to accommodate development without undermining the purposes of designation. Accordingly, where new housing development does occur within the AONB it needs to be in the best possible location and of the very best design and to meet demonstrable local housing need, particularly for needs based affordable housing.

National Planning Policy Framework (NPPF).

7. The Government has streamlined planning policy through its March 2012 National Planning Policy Framework. Within the second paragraph the NPPF states that "*Planning Policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements.*" AONBs are of course protected under the existing statutory requirements of the Countryside and Rights of Way Act 2000 as referred to above. The NPPF highlights and explains the three dimensions to sustainable development as being economic, social and environmental. These three dimensions then give rise to the need for the planning system to perform a similar number of roles – an economic role, a social role and an environmental role.

89. Although the NPPF promotes at paragraph 14 for the first time "*a presumption in favour of sustainable development*" it then goes on to highlight the position for plan makers and for decision takers in areas where this policy may be "*restricted.*" Specifically footnote (9) which highlights AONBs as such an area where restrictions may apply to the above presumption.

9. Within the Core Planning Principles (paragraph 17) of the NPPF one of the principles states that planning should:

“contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this framework..”.

In conserving and enhancing the environment, paragraph 110 states that in preparing plans to meet development needs, plans should allocate land with the least environmental or amenity value.

10. Paragraph 115 of the NPPF states that:

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”

The NPPF continues at paragraph 116 stating that:

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.

Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”*

11. Therefore, although the NPPF promotes the provision of a wide choice of high quality homes based on supporting the vitality of town centres and through creating a prosperous rural economy, the NPPF does still also recognise the restricted nature of AONBs to accommodate major housing development.

In relation to rural areas paragraph 54 of the NPPF states there is a duty to co-operate with neighbouring authorities and reflect local needs. The AONB Unit supports and wishes to engage in a strategic approach of joint working and co-operation between Local Authorities.

12. The NPPF therefore supports a different approach to housing provision in the AONB compared to land outside the AONB, based on the need to conserve and enhance its natural beauty. The NPPF recognises that “great weight” be given to AONB considerations and recognises it as an area with the highest status of protection. The CRoW Act 2000 which provides an umbrella of statutory protection to AONBs, also has to be taken into account in the plan-making or decision taking processes.

Proposed Housing Allocation Considerations

Scale

13. The North Wessex Downs AONB includes many small rural settlements. The largest settlements include Marlborough (8,009) Hungerford (5,559) Lambourn (4,200) Pewsey (3,237) and Pangbourne (2,981) (all figures 2001 ONS) and are either small market towns or

large villages. Therefore existing settlement size within the North Wessex Downs AONB is very modest.

14. Use of previously developed land within built-up areas inside the AONB (provided it is consistent with landscape and settlement character policies and protects essential services and employment) is likely to be acceptable, and a modest level of housing supply within the AONB is therefore quite normal and desirable and can contribute to the continuing viability of these settlements. Open land within settlements that is important to their character and setting should not normally be developed.

15. However, the scale of new provision of housing on greenfield sites should consider the restrictions placed on this nationally designated landscape through the NPPF and CRoW Act (2000) as described above.

Urban / Rural Split & Settlement Hierarchy

16. In terms of Government policy within the NPPF the main thrust of sustainable development is to focus significant development in locations which are or can be made sustainable (paragraph.17.) and this may include through extensions to villages and towns (paragraph.52.). In terms of rural areas the NPPF advises that housing should be located where it will enhance or maintain the vitality of rural communities (paragraph.55.).based on the allocation of the majority of all new houses to the existing largest settlements

in order to enhance or maintain the vitality of those settlements. The North Wessex Downs AONB supports this approach of considering the largest primary settlements outside the AONB first in terms of proposed housing allocations.

17. In the context of the North Wessex Downs AONB the largest settlements are those referred to above as being outside the AONB but close to its edge like Swindon, Reading, Basingstoke, Newbury and Andover together with the smaller though still significant settlements including Wantage, Grove and Wallingford as referred to above at paragraph.4. The allocation of most development to main reason behind this approach is that within these main settlements should normally take place as the services, employment and public transport provision already exists or could be extended to meet strategic levels of housing growth where possible. Therefore local authorities, in considering where to place new housing across their administrative areas, should undertake assessments on the basis that development within the main urban areas should be the starting point. Although these settlements lie outside the AONB, proposed housing allocation sites which come within the setting of the North Wessex Downs AONB, will still need careful consideration. (Further advice on setting issues is contained within the North Wessex Downs AONB Setting Position Statement October/June 2012).

18. It is noted that some local authorities have a large part of their area within the North Wessex Downs AONB. Accordingly there are some primary settlements within the AONB (as also referred to above) specifically Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne. Since paragraph 110 of the NPPF recognises that allocations of land should be directed to land of lesser environmental value and that major development should be exceptional and in the public interest it is therefore considered that major housing allocations proposed through Local Plans should focus (i) initially on settlements outside the North Wessex Downs AONB (ii) then if local need has been demonstrated, on the primary AONB settlements (as defined above) as long as they are not in conflict with the primary aims of designation and in accordance with the requirements of the NPPF.

19.20. The North Wessex Downs AONB considers that secondary service villages (beyond Marlborough, Hungerford, Lambourn, Pewsey and Pangbourne) should not normally include any housing allocations that result in greenfield urban expansion, unless they clearly meet identified local needs and again they are not in conflict with the primary aims of AONB

designation. There may also be scope where appropriate in secondary service villages for infill, redevelopment and exception sites for affordable homes. There may occasionally also be larger redevelopment opportunities, for example at former defence establishments on the edge of villages. These sites could be considered for housing where properly examined through the Local Plan process; where landscape enhancement is secured; where of a suitable scale; where an appropriate level of affordable housing and rural employment space is provided; where the schemes are of the highest quality of design; where sustainability and traffic generation through commuting is considered; and where all other environmental matters are addressed.

Bottom-Up, not Top-Down

210. There should be a bottom-up approach where landscape and environmental capacity, local need, and existing settlement scale and hierarchy are the main drivers in formulating policy and proposals on housing (including allocations, if any).

212. Special consideration should be given to housing allocations within the North Wessex Downs AONB to ensure that housing is only provided which reflects the needs and priorities of its communities (NPPF paragraph.1.) and only where it can be achieved without harm to the primary purpose of AONB designation, that being to conserve and enhance the natural beauty of the area.

223. Further to this the bottom-up approach should not be left to be too generalised as this would lead to inconsistencies and weaknesses in Local Plans. The main settlements of Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne, being the five largest settlements in the North Wessex Downs AONB, should be considered in detail (including appropriate landscape impact analysis) as to what part they could play in accommodating a suitable modest supply of homes, including affordable homes, to meet local need over a long period. Finding sites (through the Strategic Housing Land Availability Assessment process) which could be developed without harm to the landscape and countryside should be the first stage in the process. Local Authorities should robustly reject sites through the SHLAA process if landscape impact is unacceptable and consider cumulative impacts if a number of sites are proposed for each settlement.

234. The North Wessex Downs AONB accepts as stated above that beyond the main settlements of Marlborough, Hungerford, Lambourn, Pewsey and Pangbourne within the secondary service villages, which have not been specifically listed, there is still provision of services, facilities and employment that might be suitable to accommodate very modest housing growth where local need has been identified. Although the provision of affordable homes as part of open market housing schemes may resolve the lack of affordable provision in part, simply building more will not solve wider problems of lack of affordable housing or halting the loss of local rural services. In the AONB significant increases in housing numbers are likely to do irreversible damage to the environmental assets which underpin the original reasons for the AONB designation.

Release of Greenfield Sites for Housing

245. The release of greenfield land for housing allocations will always need specific justification because of the AONB. In many cases loss of countryside on the edges of the main AONB settlements will not be consistent with the primary purpose for AONB designation, being to conserve and enhance the natural beauty of the landscape. However, there may be some exceptions, where landscape impact and loss of character would be minimal. In those cases the AONB unit will consider greenfield releases of housing sites acceptable on the edges of the main settlements of Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne through local authorities' formal housing allocation process. There may also be a more limited role for small scale housing sites within or on the edges of the secondary larger villages as explained above. Following consideration of the requirements

of the NPPF, any proposal for greenfield housing development would also need to demonstrate:

- (i) That it would give rise to no or minimal adverse impact on the qualities for which the area has been designated as an AONB;
- (ii) that specific consideration to local housing need within the AONB shows that the need demonstrably exists;
- (iii) why sites within the main settlements cannot fulfil the housing local need requirement instead of greenfield sites on the periphery;
- () why settlements outside the AONB cannot meet the required housing need instead meet that local need arising from within the AONB; (for example Swindon, Wantage and Grove, Didcot, Wallingford, Reading, Newbury, Theale and Thatcham, Basingstoke, Andover, Ludgershall, Devizes and Calne); and
- (iv)
- (ii)(v) that there has been a filtering out of the most unsuitable sites through the Strategic Housing Land Availability Assessment (SHLAA stage) in respect of potential impact on the landscape of the AONB (in reference to sites both within the AONB and outside but affecting the setting of the AONB – see North Wessex Downs AONB Position Statement on Setting June 2012).

If all these requirements are met and sites are allocated in development plans, any proposal should be supported at application stage by a Landscape and Visual Impact Assessment offering detailed and substantial mitigation measures; be of the highest quality of design, layout, landscaping and materials; include sustainable measures in respect of dwelling design; and not conflict with the overall objectives of the North Wessex Downs AONB Management Plan 2009-2014.

256. Therefore, only on the edges of Marlborough, Hungerford, Lambourn, Pewsey, and Pangbourne and where found appropriate in terms of AONB impact and where all other planning issues have been resolved will the allocation of greenfield land be supported for new open market housing development. In a far more limited role, small scale housing sites within or on the edges of the secondary larger villages, will only be supported for allocation where again sites have been found to be appropriate in terms of AONB impact and where all other planning issues have been resolved. The provision of affordable homes through exception site policies could also be possible in these locations, where need has been demonstrated and landscape and environmental harm can be minimised. Housing may also be delivered through the Neighbourhood Plan process, in addition to that allocated by Local Authorities, though such provision should still be in general conformity with any Core Strategy and again be appropriate in terms of AONB impact and all other environmental considerations. It should also be noted that some constituent Local Authorities that make up the AONB have no larger or secondary larger villages at all within the AONB.

Settlements and infill development

267. The character of the undeveloped rural landscape is inextricably meshed with that of the settlements within it, and vice versa. The character of some North Wessex Downs settlements has however been severely eroded/compromised in recent decades by the widespread building of (largely suburban-style) housing estates within 'settlement boundaries' defined in local development plans. Settlement boundaries may have a useful function to perform in preventing or controlling outward expansion and enabling the identification of exception sites. It is important however that planning policies and decisions should not assume that 'infill' development of undeveloped land within settlement boundaries is acceptable in all cases. Settlements are defined as landscape in the terms of the European Landscape Convention, and towns and villages within the AONB are, in planning terms, 'washed over' by the designation.

278. A settlement's character in many cases depends critically on the presence of green land within it. Therefore, a site's location within an assumed boundary or within the visual built envelope of a settlement may not always make it suitable for development if it is of landscape, heritage or open space value. Even if a site is found to be suitable for infill development, it should still be of a high quality of design and layout and respect the historic settlement pattern.

Section 85 Duty

289. Development Plans should therefore contain clear strategy statements in respect of the North Wessex Downs AONB with the starting point being authorities' Section 85 duty (CRoW Act 2000) to have regard to conserving and enhancing the natural beauty of the area. Housing allocations should only be made through a bottom-up approach to meeting local housing need, with particular emphasis on encouraging affordable homes provision and conserving and enhancing natural beauty.

Community Land Trusts

2930. There is also an acceptance that there may be a growing role for the provision of affordable housing or for land to be developed for housing under the Community Land Trust model. These sites again should meet local need for local affordable homes and should be considered in respect of other potential impacts like landscape harm. Community Land Trusts, for example, are able to meet local housing need even in rural areas with very high house prices by retaining an equity share in each property. Each homeowner gains an equity share in the property, as well as a stake in the wider community. They provide affordable housing which remains affordable in perpetuity, therefore benefiting many generations of residents. The AONB Unit is keen to work with local authority and community partners who wish to explore the potential for CLTs in their area.

Planning Application Considerations

301. In considering individual planning applications the North Wessex Downs AONB would expect the specific guidance for each Landscape Character Area found in the Landscape Character Assessment and information in the Management Plan to be used to guide assessment of the siting and suitability of development. These documents should also be used in conjunction with any more detailed guidance developed by individual local authorities, including Village Design Statements, Conservation Area Appraisals and Design Codes and Parish and Town Plans.

312. Although Just because a proposed new house may not be particularly visible does not mean that it is acceptable in the countryside.. Otherwise the countryside would soon become covered in well concealed houses. It is not just visual change but also change in character which causes harm. New house building in the countryside brings with it a level of domestication with features including lighting, new drives, gardens, sheds, car parking, traffic, washing lines and even bins. Therefore, even if a new dwelling is not particularly visible there is often a change in character resulting from new house building. The character of the AONB, including tranquillity, isolation or dark night skies for example, can too easily be lost.

323. In locations where new house building may be acceptable in planning policy terms, the North Wessex Downs AONB will apply the following criteria in considering any planning applications for residential development:

- (i) Developments should integrate well into the historical pattern and character of the settlement. This will vary depending on the landscape and built character type and needs to be determined on a case-by-case basis. Specific consideration should also be given to the established density, scale, building height, roof pitches and layout of an area in designing new proposals.

- (ii) Building style should respect the local tradition. Inappropriate, particularly suburban styles, layouts and materials should be avoided. Where new building is required, it should be to a high standard of design as befits a nationally designated landscape. Innovative schemes based on sustainable construction principles are to be supported though should still respect local styles and materials.
- (iii) External building materials should respect and reflect the locally occurring rock types, brick, and roofing materials to ensure the finished design relates to the landscape that surrounds it. Locally sourced materials are also encouraged, to reduce long travel-to-site distances as well as the use of reclaimed materials.
- (iv) Developments must respect and conserve and not obstruct public views to higher slopes, skylines, or sweeping views across the landscape or landmark views within the settlements.
- (v) Existing buildings built of traditional materials and of architectural merit should be restored and re-used in preference to new building. Existing buildings should be carefully conserved and proposals for conversion to new uses must retain their historic integrity and functional character. Sound conservation advice and principles must be sought and implemented at all times during this process to achieve the right balance for individual projects.
- (vi) Traditional agricultural buildings of merit and good condition should be retained in their current use or, if shown to be genuinely redundant, preferably converted to employment/social use or possibly holiday accommodation. Conversion to residential use may result in landscape, sustainable development and design concerns. However, subject to schemes according with Government and local planning policies, residential conversions in certain circumstances may be supported.
- (vii) Particular care should be taken in new housing development to ensure external lighting is minimal and any that is installed is designed to be downlighting with no light spillage, discreet and “dark night sky compliant”. Preferably external lighting (including street lighting) should not be installed where it does not already exist. Where lighting is essential it should be minimised and only used for short periods in limited locations. Paragraph 125 of the NPPF states *“By encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*
- (viii) Care should be taken in designing new access roads to avoid suburban designs which would be alien to local character and historic street scenes or where they result in intrusion into the landscape. Highly engineered road layouts typical to larger urban areas with pavements, kerbing, sign posting and street lighting often look out of place when added to small rural settlements where road design has evolved in a far more informal and low-key style. The Manual for Streets 2007 (and its companion guide 2010) highlights a change in approach to residential street design to in particular take into consideration existing local character.
- (ix) Brownfield land use for housing within existing urban areas in the AONB is supported where there is no loss of viable local services, facilities or employment. (Accordingly brownfield land use within the countryside of the

AONB outside settlements and away from services, facilities and employment should be strictly controlled).

- (x) All new housing should include measures to save energy and resources and should meet or exceed relevant Government targets in this respect.
- (xi) All new housing should be located and designed to take account of and protect existing landscape features such as trees and hedges of value and where appropriate to provide new landscaping to frame or soften new developments and to increase biodiversity. Soft landscaping can also hold rainfall and reduce water run-off, avoiding unsustainable drainage options.
- (xii) Any form of new housing development within or in the setting of the World Heritage Site of Avebury, being already strictly controlled, will be considered in particular detail by the North Wessex Downs AONB in relation to the heritage asset and landscape character and setting (and in consideration of Circular 07/2009 on the protection of World Heritage Sites and the Avebury WHS Management Plan).
- (xiii) New isolated homes in the countryside should be avoided unless there are special circumstances. Any such proposed development in the countryside of the North Wessex Downs AONB will therefore be carefully considered in relation to paragraph 55 of the NPPF and in relation to potential harm from visual intrusion and change to the character of the AONB.
- (xiv) Replacement dwellings should be of a scale and location that does not result in the new dwelling being particularly larger or higher or in a different location compared to the existing, unless exceptional justification and other landscape and ecological benefits can be provided. Proposals for replacement dwellings should demonstrate how the quality of the landscape is conserved and enhanced.
- (xv) Proposals for affordable housing where local need has been demonstrated are positively supported though should still also meet the above design, materials, location and landscaping requirements.