

South Shropshire Affordable Housing Interim Planning Guidance

Comments from Shropshire Hills AONB Partnership, 20 September 2006

1. Overall comments

- 1.1. The Shropshire Hills AONB Partnership welcomes this consultation document from South Shropshire District Council and the opportunity it provides to address and clarify issues around this difficult and important topic. This response has been informed by discussion at the AONB Partnership Management Board and consultation with Partnership members, and the general thrust of the response has been endorsed by the Management Board.
- 1.2. Though the issue of affordable housing is not unique to the Shropshire Hills or to AONBs, we recognise that the issue is fundamentally connected with the AONB. The natural beauty of the area and the strict protection of it through planning both contribute directly to the affordability problem. While the AONB's purpose is principally to conserve and enhance natural beauty, the purposes of designation also include a requirement take account of the economic and social needs of local communities, and we are particularly mindful of this requirement in our response to this consultation. The purposes of AONBs also support a sustainable development approach. In this we recognise that vibrant and sustainable communities are an integral part of the countryside of the AONB. It is not intended or desirable that the existence of natural beauty and its protection have serious social consequences. The Council's exposition of the issue as it affects the District and the case for action is fully accepted. We note that the Council is adopting many of the key recommendations of the national Affordable Rural Housing Commission report of 2006. We hope that the AONB Partnership can play a useful role in helping the Council to address housing need in ways which are also compatible with its duties to protect the special qualities of the AONB.
- 1.3. In seeking to understand the links between the affordable housing and the AONB, we have considered a number of aspects:
 - The potential impact of the housing itself (both affordable and the market housing required to generate funds) on the landscape. This is the most obvious connection between meeting housing need and the AONB. We acknowledge that the views of AONB Partnership members vary on the relative weighting of these potential impacts against the housing problem, and that the landscape impacts can be seen as a threat to the natural beauty of the area. We are also aware from our recent perception study and from Parish Plans that many residents of the AONB regard inappropriate development as a key issue for the area.
 - The extent to which the affordable housing problem limits the labour and skills available to both manage the landscape and sustain local communities. If this is the case, provision of affordable housing will in some cases help directly to conserve the landscape as well as supporting the social and economic needs of the area. It appears that data on occupations is not available to understand to the extent of these links, but we believe them to be there in at least some cases.

- The implications for transport and hence tranquillity in the AONB. Enabling workers in lower paid jobs in rural areas to stay living near their work should help to reduce travel, with associated environmental benefits.
 - Impact on rural culture. The forcing out of local people with long connections with and deep knowledge of the area due to high house prices is a significant loss for the rural culture which is so inextricably linked to the countryside.
- 1.4. We feel that the ability of the District Council's policies to address housing need at the same time as protecting the AONB (and therefore potentially easing the passage of applications) will be improved by addressing this inter-relationship more explicitly. It is slightly disappointing in this respect that the draft guidance document does not mention the AONB at all. It is also difficult from the consultation document to judge the likely scale of development within the AONB arising from the policies, and therefore the potential impact. It may be deduced that the majority of new housing will be provided outside the AONB. This would seem justified since although the AONB comprises around 67% of the total area of South Shropshire District, only 39% of the District's population live within the AONB (15,628 in the AONB within South Shropshire, out of 40,410 in the District as a whole). These figures underline the fact that the AONB excludes most of the main settlements of the District and mainly comprises the most sparsely populated areas. While the AONB is largely a settled and managed landscape, its low population density is strongly related to its natural and special qualities. Clarification of the likely distribution of numbers of houses in relation to the AONB would be very helpful.
- 1.5. Though the adopted Local Plan has a general policy on the AONB, we would suggest that the housing policies in the guidance should distinguish between those settlements identified for housing which are within the AONB and those which are not, and apply more rigorous standards in terms of scale, siting and design to those within. This applies especially to Church Stretton as the only town within the AONB. Given the large number of villages which lie across the AONB boundary (due to its frequent relation to roads), the appropriate stage of the Local Development Framework should make clear a policy on such 'split' settlements. The logical basis for this would appear to be to treat the whole village as if it were within the AONB. Using the settlement boundary as a simple basis for this may however cause problems when for example exception sites are proposed adjacent to a settlement.
- 1.6. Because exception sites are not usually identified until applications come forward, the opportunity for a proper evaluation of their impact is adversely affected by the short timescales imposed by the development control process. Such proposals also attract a great deal of public concern. The landscape sensitivity mapping work being carried out by the District Council, the AONB Partnership and other Shropshire planning authorities should help to guide the location of new housing development. This will enable a plan-led approach to identifying the best locations, as supported by the draft PPS3 on Housing. Making reference to the sensitivity work in the guidance will strengthen the Council's best practice approach, and help to allay fears by giving greater confidence in the decision making process. The results of the work are expected in spring 2007 and ideally these would be used to indicate the locations of potential exception sites in the final Interim Guidance. This would enable the Guidance to take account of the changes to exception sites policy given in PPG3 (revised).

- 1.7. We welcome the Council's recognition of the need for high design standards and commitment to high environmental standards in both affordable and open market housing.

2. Detailed Comments

- 2.1. The Local Plan provides forecasts for housing development in Table 1 on page 12. It would be helpful if this information was repeated in the Interim Guidance.
- 2.2. The Local Plan (Policy SDS7) states that housing exception sites will be small and located **within or adjoining** certain villages. The Interim Guidance (section 6.0.3) suggests that exception sites will be located **in** villages. This discrepancy in wording should be resolved.
- 2.3. Paragraph 1.3.6 of the Interim Guidance suggests that infill development is appropriate within smaller settlements. This paragraph is difficult to interpret. The Local Plan differentiates between villages where exception sites will be permitted within or adjoining the settlement and those where affordable housing provision will be restricted to infilling. A similar level of clarity should be provided here.
- 2.4. Single plot developments The policy on single plot development makes no mention of where such development will be permitted. Informal discussions have revealed that single plots for development would be confined to the nine main settlements. We strongly suggest that the Interim Guidance is amended to make this clear.
- 2.5. The Guidance also makes conflicting statements on single plot developments. It says that they will not be permitted at all in paragraph 1.33 but that they will be subject to a financial contribution in paragraphs 5.2.1 and 5.3.1. The Guidance should provide a consistent approach to each issue.
- 2.6. We support the departure from Local Plan policy detailed in Appendix C (final 3 paragraphs), providing for single affordable dwellings in many of the smaller settlements within the District. Under this departure, the smaller settlements should be able to provide for local people's needs, where supported by the Parish Council. We urge that the social, economic and environmental elements required in the justification from the Parish Council be given equal weight in the both the preparation of the justification and in its assessment.
- 2.7. We would welcome some indication of timescale or numerical limits to development under this policy departure. Even single plot developments if permitted in sufficient numbers or concentrated in time may have an adverse effect on the character of settlements and hence the AONB.
- 2.8. Farm building conversion While we still support the Council's policy preference for economic uses, where conversion to domestic use is likely to save historic buildings which may otherwise be lost or continue to deteriorate, this should also be considered. If the policy on this is changing, further guidance may be necessary to ensure conversions are carried out sensitively. Paragraph 1.3.5 of the Guidance on the conversion of traditional rural buildings to market housing is

difficult to interpret. It could be read as suggesting that an Affordable Housing Payment is required because traditional buildings can be sold for more money. Whilst this is probably not the case, a clearer wording of this paragraph is needed.

- 2.9. Design criteria The scale and design and of new development is every bit as important as its location in terms of impact on the landscape. The AONB Partnership has been unable to support many applications in the past because the scale and design of the proposal has been out of keeping with maintaining the special qualities of the AONB. This has been a particular issue in Carding Mill Valley recently.
- 2.10. A recent government circular Guidance on changes to the development control system, effective from 10 August 2006, strengthens the role of Design and Access Statements in the planning application process. An accompanying Good Practice Guide 'Design and Access Statements' has been published by the Commission for Architecture and the Built Environment (CABE), the government's adviser on architecture, urban design and public open spaces. This supports the concept that scale and design of buildings should support local character and relate well to their surroundings.
- 2.11. This Interim Planning Guidance provides very little information on the scale and design of new housing development. Such information is vital in ensuring that future housing plays its role in conserving and enhancing the Shropshire Hills AONB. Design and Access Statements should be made compulsory for all new housing proposals within or affecting the AONB. Applicants should be encouraged to explain and justify their proposals through the preparation of such Statements.
- 2.12. Density Government guidance requires new houses to be built at much greater densities than in the past. Broadly speaking this approach is to be supported because it makes more efficient use of land. There is a fine line however, between good and sensible use of land and the building of houses so close together that they become out of keeping with their surroundings. The Interim Guidance should make mention of the expected densities for new housing development, taking into account government guidance and landscape impact. In providing such detail, it is important to relate the expected density to the size of dwellings, e.g. more 2-bed houses can be accommodated on a given site than 5-bed.
- 2.13. Planning briefs Planning briefs are an effective tool for guiding new development and their use is to be encouraged. Paragraph 3.2.2 of the Guidance states that planning briefs will be prepared for large sites, but does not specify what constitutes a large site. An indication of the areas of land which will trigger the preparation of planning brief should be provided.
- 2.14. Presentation While the document must clearly include detailed technical material, the current format may be off-putting to members of the public. At the same time, the existing Local Plan policies which are being amended by the Interim Guidance are not immediately obvious, being located in Appendix C. Taking these adopted Local Plan policies and showing how these are amended by the Interim Guidance in the main text may be preferable. The technical information in sections 2, 3, 4 and 5 could then be included as appendices. The

readability of text could be improved in places, with shorter sentences and consideration of the audience profile.

For further information on the issues raised, please contact Joy Tetsill, Planning and Policy Officer on 01588 674084