



# **HOUSING EVIDENCE PAPER APPENDICES - Resources, Housing Policy and Context DRAFT WELLAND neighbourhood plan 2021-2041**

Sue Haywood MA (Oxon) Zoology, MSc (Oxon) Environmental Change & Mgt  
for Little Malvern and Welland Parish Council

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**Addendum dated 12 March 2023:**

Since this paper was written, the Regulation 19 SWDP Review documentation has been published for consultation (Nov 2022). This provides a revised IHR for Welland of 25 and some updated policy numbers and content from the 2019 SWDPR Preferred Options documents referred to in this paper. The rationale and the conclusions in this paper however are still considered to be relevant and consistent with current & emerging policy. The Consultation Statement lays out the timeline for the various evidence bases that have informed this Plan, including the IHR information available for use by the NPWG and LM&WPC.

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### APPENDIX A: Policy and Evidence Sources

- Welland Neighbourhood Development Plan (“the Plan”) Reg 14 Consultation Draft Plan and Appendices
- Regulation 14 Consultation Locality Health Check Examiner response
- Regulation 14 Consultation Community Responses
- NPG Meeting with MHDC 11/3/2022
- Author correspondence with Local Authority Planning Officers & Housing Officers Jan-April 2022.
- Housing Needs Survey Midlands Rural Housing March 2019 – see also Appendix E of this paper.
- SHELAA November 2019
- Welland Neighbourhood Plan: Housing Site Allocations - Site Assessment Report (Sept 2021)
- Welland Housing Needs Assessment (WHNA) (AECOM, March 2021)
- Malvern Hills Area of Outstanding Natural Beauty Management Plan 2019-2024
- Welland Landscape Assessment (June 2015)
- Welland Landscape Sensitivity and Capacity Assessment (December 2019)[http://www.wellandparishcouncil.org.uk/sites/default/files/uploads/Landscape Sensitivity %26 Capacity Assessment %28December 2019%29.pdf](http://www.wellandparishcouncil.org.uk/sites/default/files/uploads/Landscape%20Sensitivity%26%20Capacity%20Assessment%28December%202019%29.pdf)
- Benchmarking
  - Hanley Castle Parish Neighbourhood Development Plan (January 2019), Colwall Neighbourhood Plan (June 2021), Charlbury Neighbourhood Plan (June 2021)
- The National Planning Policy Framework July 2021 (“the NPPF”)
- The South Worcestershire Development Plan adopted 2016 (SWDP2016)
- Affordable Housing Supplementary Planning Document (Oct 2016)
- The South Worcestershire Development Plan Review Preferred Options Consultation Document November 2019 (SWDPR)
- Landscape Character Assessment, Position Statements, in particular on Neighbourhood Plans, Housing & Development in the AONB and Affordable Housing
- Malvern Hills AONB Nature Recovery Plan Consultation Draft January 2022
- Landscapes for Life – Position Statement: Planning for Housing within AONBs in England (The National Association AONBs)
- The Cotswolds Conservation Board Housing Position Statement April 2021
- 2012-2017 Independent Review of Housing in AONBs (David Dixon, Neil Sinden and Tim Crabtree November 2017).
- Malvern Hills Rural Lettings Policy January 2021
- Landscapes Review (National Parks and AONBs) Government Response 15 January 2022
- Malvern Hills AONB Environs Landscape and visual sensitivity study (White Consultants for Malvern Hills District Council) May 2019
- The Malvern Hills AONB Partnership '*Guidance on identifying and grading views and viewpoints*'.
- Nov 2019 Malvern Hills AONB joint advisory committee position statement 1: development and land use change in the setting of the Malvern Hills AONB
- An Independent Review of Housing in England’s Areas of Outstanding Natural Beauty 2012-2017 FINAL REPORT NOVEMBER 2017 Prepared by: David Dixon, Neil Sinden and Tim Crabtree.
- The Affordable Housing Supplementary Planning Document (Malvern Hills Council, Worcester City Council, Wychavon District Council) October 2016
- The South Worcestershire Five Year Housing Land Supply Report Sept 2021
- SHMA Malvern Hills Final Report 2019
- Levelling up and Regeneration Bill

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### APPENDIX B: Housing Policy Context Overview

Evidence to support housing policies in the Welland Neighbourhood Development Plan (“the Plan”) must be considered within the scope of national and local policies and other relevant guidance. This sets the parameters for the data to be analysed and dictates the most appropriate methodology for assessing, quantifying and qualifying the housing requirement for Welland.

National strategy and policy are currently designed to encourage the delivery of much needed homes. This study accepts this and this Appendices document thus investigates the specific national and local policies that apply to Welland and how they offer particular opportunities or constraints to the capacity of the parish for housing development.

Pertinent national policy and guidance that must be considered includes the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG) which set out the Government’s planning policies for England and how these are expected to be applied. The NPPF was most recently revised in July 2021 and - although must be taken as a whole - of particular relevance to housing in Welland are paragraphs that refer to neighbourhood plans, rural housing and the AONB and policies that protect areas or assets including 11-14, 63-67, 78, 79, 175-177 including footnote 60, 179 and footnote 62, 180-182, 189-190, 194-197, 199-204. Importantly for this study, Paragraph 11 of the NPPF states that strategic policies should provide for objectively assessed needs for housing and other uses unless the application of the policies within the Framework that protect areas or assets of particular importance, such as an Area of Outstanding Natural Beauty, provides a strong reason for restricting the overall scale, type or distribution of development on the plan area. This Appendices document particularly examines these constraints to understand how any presumption for development might be affected and therefore impacts the housing requirement to be delivered in the Plan’s policies.

The relevant local area strategic policy is the South Worcestershire Development Plan adopted in 2016 (SWDP2016) and which covers the period 2006-2030. The SWDP was prepared, found sound and adopted in the context of the NPPF<sup>1</sup>. The SWDP is based upon and reflects the presumption in favour of sustainable development, with clear policies that guide how the presumption will be applied locally. A significant amount of the SWDP2016 is relevant to the Plan and the policies and provisions of particular importance to the issue of housing in the WNA within the scope of this paper include: SWDP2, SWDP3, SWDP6, SWDP14A, SWDP15, SWDP16, SWDP20, SWDP22, SWDP23, SWDP24 and SWDP59. It should be noted that the three sites allocated for development in Welland under SWDP59 (SWDP - SWDP59/13, SWDP59I and SWDP59zI) have been completed.

Whilst the SWDP2016 is the local development plan currently in force, the PPG requires that the Plan must also clearly recognise the emerging policies in the South Worcestershire Development Plan Review (SWDPR) that is currently in progress and nearing Regulation 19 consultation this summer, before submission for independent Examination in November 2022 and a view to adoption in October 2023.

As with the SWDP2016, much of the whole emerging SWDPR is pertinent to the Plan, but proposed policies of particular relevance for this study include the proposed SWDPR2, SWDPR13, SWDPR14, SWDPR15, SWDPR18, SWDPR22, SWDPR24, SWDPR26, SWDPR27, SWDPR28 and SWDPNEW99.

A significant change worth noting between the SWDP2016 and the emerging SWDPR is the manner in which the latter gives greater prominence in its policies and accompanying narrative to both

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<sup>1</sup> This was the 2012 NPPF and not the current 2021 NPPF which is one of the arguments for the SWDP being out of date.

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neighbourhood plans and also protections for the AONB and its setting, particularly reflecting the strengthening national policy on the setting of an AONB, and also biodiversity.

Further national and local policy and guidance that applies to the Plan is within the local and national AONB Management Plans and position papers, other pertinent national policies (such as the Environment Act and First Homes), local research papers (such as the Malvern Hills AONB Environs Landscape & Visual Sensitivity Guide and also the November 2019 Malvern Hills AONB joint advisory committee position statement 1: development and land use change in the setting of the Malvern Hills AONB) and benchmarking/case studies such as Appeal decisions and other neighbourhood and local plan policies. Newly announced strategies such as the Biodiversity Net Gain and also Nature Recovery Strategies, and the Levelling Up and Regeneration Bill (May 2022) are also potentially pertinent, particularly given the latter is proposed to include specific additional opportunities for neighbourhood plans.

A discussion of some of the characteristics and constraints pertinent to Welland that define which national and local policies and guidance sources are most relevant and their application for the purposes of the Plan is included in Appendix C, with further detail specifically regarding the AONB and its setting in Appendix D.

### Appendix C: Policies affecting Housing Need Data Analysis

#### C.i Methodology – Reasoned Justification

Given the number of constraints in their various forms affecting Welland Parish – the AONB and its setting, Nature Recovery area, Natural England habitat licence etc..) identified in this Appendices document, a presumption in favour of sustainable development as described at paragraph 11b in the NPPF is less clear. It is therefore important to examine the evidence for the housing requirement for the parish for housing policies and any allocations for development to be made in the Plan.

Welland’s Vision as stated in the Plan is for it to be a thriving rural village, providing a range of high-quality homes to meet the local need, whilst also preserving the village’s unique and special charm arising from the landscape and the natural and historic environment of the village and its relationship to the open countryside and the Malvern Hills.

‘Housing need’, as calculated using the standard method, is an *unconstrained* assessment of the number of homes needed in an area. In contrast, establishing the ‘housing requirement’ for an area requires consideration of ‘constraints’<sup>2</sup>. As such, there is a clear distinction between ‘housing need’ and ‘housing requirement’ that is important to bear in mind when considering housing policies for the Plan as efforts to accommodate an unadjusted housing need figure potentially risk harming an AONB protected landscape or compromising natural capital or historical assets.

Another important distinction is worth noting – “need” does not only differ from housing requirement, it also does not equal demand. New houses at full market price appear to sell easily in the parish but that does not necessarily mean they are being bought by people with local connection to meet a local housing need.

The SWDP2 and preferred options SWDPR2 policy requirement is for Welland, as a Category 1 Village to predominantly (though not solely) meet locally identified housing need. However, the allocations within these villages, or sometimes indicated through an Indicative Housing Requirement (IHR) number for a settlement, makes a ‘small’ provision (relative to the overall provision) to help meet the objectively assessed need for the whole of south Worcestershire.

However, as analysed later in this Appendices document, there is currently inconsistency between policies within both the SWDP2016 and SWDPR regarding the definition of local need, including how to assess need for development applications for windfall versus RES proposals. Further, there is also inconsistency between policies in the SWDP2016 and the 2016 Affordable Housing Supplementary Planning Document and national policy. All this is particularly complicated for Welland as policies and associated guidance reflecting its position partly in the AONB can be contradictory to provisions for its status as a Category 1 village and/or its situation in a designated rural area. Policy officers from both AONBs in the SWDP area are currently communicating with SWDPR planners on this subject, and how to more appropriately reflect the most recent NPPF changes affecting the AONB and its setting in the forthcoming Reg 19 document in the SWDPR process.

For the purposes of the Plan, as will be argued in more depth later in this document, in order to prioritise delivery of homes within the limited capacity for development in Welland, the ‘local housing need’ for Welland could be most usefully defined as the needs arising from the existing community within the WNA or those with genuine local connections (through employment and/or family members or other close support network). It is also not unreasonable for Welland to also consider

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<sup>2</sup> Definition as produced and examined by the Cotswolds Conservation Board in their 2021 Housing Position Statement.

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such local need as is arising in neighbouring settlements that also fall wholly or partly in the AONB. The rationale for this is that these settlements also have more limited scope for development outside of the designated landscape. There should also be an acknowledgement in the identification of “local housing need” of such provision as also may be needed to maintain the parish as a demographically mixed and viable community in the future. However, given the constraints in the WNA discussed in the previous sections, this does not imply an expectation of growth beyond the objective of meeting those needs.

PPG recommends a consideration of the existing housing provision and its suitability, having regard to demographic shifts in age and household composition, to address future, as well as current community need. This has been done in the main Housing Evidence Paper to which this Appendices paper applies, by using data (that was not considered to have been superseded) from a Housing Needs Assessment produced by AECOM March 2021 for the Little Malvern and Welland Parish Council (hereon referred to as the “WHNA”), and a developer-commissioned Housing Needs Survey (HNS) in 2019. Correspondence with the MHDC’s planning and housing departments has provided evidence of new development since those reports were produced and has enabled this to also be taken into account, along with up-to-date Housing for You (social rental register) data, an updated IHR from MHDC, and also information lifted from recent local planning application evidence documents.

Importantly, the impacts of any existing and newly completed development on the capacity of the parish for further housing need to be assessed for the production of the Plan and are recommended to be repeated in the period of the neighbourhood plan. LSCAs form an important part of this process, as do housing needs surveys that capture community satisfaction and qualitative feedback.

Unfortunately, only 2011 Census data was available for the commissioned WHNA by AECOM. 2021 Census data is due to be published in early summer 2022, and the Plan would benefit from commissioning a second housing needs assessment following full publication of that data to not only validate the conclusions in this report but also to provide a relevant reference and resource for the implementation and interpretation of the Plan during the Plan period to 2041.

Interestingly, housing needs assessments produced for other neighbourhood plans benchmarked in the production of this study have only suggested projection figures for a 5-year period because of the difficulty in accurately predicting housing needs any further ahead for a small settlement and therefore this is a constraint that should be acknowledged in the interpretation of any Housing Needs Assessment used for development of the Plan.

The CCB Housing Position Statement, benchmarked during the course of this study, considers rural housing need surveys (HNS) as forming an important part of the evidence base for potential housing developments for both windfall and RES proposals. However, it notes that 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 than is sustainable for a settlement. This is particularly true for settlements set partly within the AONB where housing may still be allocated on sites outside the AONB (especially in settlements higher up the settlement hierarchy such as Welland) and/or where there is strong developer interest in new housing. Similarly, MHDC housing officers in correspondence with this study’s author confirmed they consider housing needs surveys to be considered valid and relevant for up to five years. It would therefore be contingent on the NPG to have another housing needs survey commissioned by Spring 2024 to ensure there is up to date resource for use alongside the Plan. Engaging this via the Parish Council or NPG would also produce a more independent report than one that is developer led.

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Further to feedback in the Regulation 14 consultation, including the healthcheck and community responses, and also in light of emerged and newly emerging national and local policy and guidance, particularly the changes in the SWDPR, 2021 NPPF and PPG (such as the First Homes strategy), and future changes such as those that arise in the proposed Levelling up and Regeneration Bill, it is recommended that some of the narrative and reports provided in the Regulation 14 version of the Plan and its appendices should be reviewed and updated.

Conclusion A: The Parish Council and/or NPG could ensure that key resources for use as a reference for verifying local housing need are up to date through the lifespan of the Plan. This could include a Housing Needs Assessment that utilises 2021 Census Data and a non-developer led Housing Needs Survey by February 2024 and then every 5 years of the life of the Plan. Importantly, further assessment of the cumulative impact of completed new housing on the capacity in Welland to accommodate further development – i.e. to re-evaluate the housing requirement for the WNA - could be undertaken. This could include the commissioning of further Landscape Sensitivity and Capacity Assessments periodically (for example every 5 years, depending on the scale of development in that period) as these reports are of significant value for the particular circumstances and constraints relevant to Welland. Providing such up to date guidance would be particularly valuable for any criteria based policies that are included in the Plan, such as an indication of the capacity or sensitivity of specific sites for further housing development.

Conclusion B: The Plan would benefit from being clear in its narrative as to what evidence to determine housing requirement is considered relevant and valid for the interpretation of its policies for future housing development proposals in the WNA. It is recommended that these should include the HEP and this Appendices document, and also any Welland Parish Housing Needs Assessments, Parish Housing Needs Surveys, LSCAs, and social and affordable housing register data reports that are subsequent to this HEP, and where these are either community commissioned (via the Parish Council/NPG/residents associations) or have been independently verified if they are developer-led evidence.

### C.ii Protected Landscapes Status

When considering the policy context for housing provision in Welland, it is important to establish how much of the WNA is affected by the AONB designation because national and local policy directly impacts housing development, including distribution, scale and type, in an AONB. Also, increasingly, policy and guidance is starting to emerge regarding housing development in the setting of an AONB. Appendix D provides further references and discussion of these issues, and is material to the analysis and conclusions in the HEP and this document.

The well-mapped boundary of the Malvern Hills AONB (MH AONB) enables us to clearly establish that approximately 40% of the WNA falls within the MH AONB itself.

Less evident at first is how much development in the WNA could be considered to fall within the setting of the MH AONB. It is often cited that there is no clear definition for the setting of an AONB in the NPPF or other national guidance, it being dependent on local topography, viewpoints into and out of an AONB and other considerations such as the scale of a particular development. However, it is logical to align an interpretation of development in the setting of the MH AONB in this study, and thereby in the Plan, with that used in two separately published and credible local documents that have specifically considered issues regarded as relevant for this and which corroborate each other's conclusions.

The first is the Malvern Hills AONB Environs Landscape and visual sensitivity study conducted by White Consultants for Malvern Hills District Council in May 2019, which specifically explains (para 1.4) that



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*“This study also provides a technical justification should the SWC wish to develop a draft planning policy for appraising development proposals within the setting of the Malvern Hills AONB” and concludes that “our opinion is that as a starting point a broad brush setting distance within the study area is around 5 km [from the ridgeline of the hills]”.*

Meanwhile, the Malvern Hills AONB Nature Recovery Plan Consultation Draft January 2022 also proposes a similarly sized area for the setting of the MH AONB, suggesting it as being *“defined by the 3km-wide area around its [the AONB’s] boundary”.*

Also, a position statement has been produced to address the importance of introducing policies to protect the setting of the Malvern Hills AONB and key views, including long range views out of the AONB<sup>3</sup>. In this, although the ability to define the AONB geographically by a line on a map is ruled out *“such a line would probably be all but impossible to draw”*, it makes it clear that the extent of the setting of the AONB varies depending on the nature and location of the change being proposed and *“In terms of landscape character it [the setting] can be considered to include the area outside the AONB whose character compliments that of the AONB, either through similarity or contrast. In terms of views it can be considered to include those areas which are visible from the AONB and which offer views towards it (i.e. are intervisible).”*

When considered alongside the White Consultants study, which importantly for the analysis in this HEP Appendices paper utilises a study area and viewpoint that explicitly includes Welland, the Malvern Hills JAC position statement adds weight to the importance and intervisibility between the AONB and the area defined by the Welland Neighbourhood Plan, and the conclusion proposed in this paper that development in the entirety of the WNA could reasonably be considered as either within the AONB or its setting for the purposes of analysis in the Housing Evidence paper and for the plan making stage of the Plan

Further to all this, there is commitment at national and local level to the introduction of policies and practice that will strengthen protections for both the AONB and its setting, including in terms of permitted development, such as those arising from the Glover Review and MH AONB Partnership initiatives and position statements/guidance. It is logical that the Plan should ensure it is in a position to accommodate such recent and emerging policies and guidance given they will impact the period of the neighbourhood plan.

Finally, this more precautionary approach is consistent with both the Vision of the Plan and the objectives that are reliant on the special qualities of the AONB and its setting: *[Welland’s] relationship to the open countryside and the Malvern Hills is integral to its unique and special charm; Residents and visitors will value and enjoy the landscape and the natural and historic environment of the village; ensure that the scale of development is appropriate to the sustainable growth of the village whilst seeking to maintain its rural character; to ensure that Welland and its residents exist in harmony with the landscape and with the natural and historic environment; to protect, enhance and conserve the AONB and its setting, and wider landscape and views.*

Conclusion C: Aligning the HEP with two definitions provided for the setting of the MH AONB in credible local publications, for the purposes of the analysis in the 2022 Housing Evidence Paper and in the consideration of policy development for the Plan, it is reasonable to conclude that development in the whole of the WNA may be considered to be either in the AONB or its setting and therefore policies and capacity for development should be considered in this context. The western 3km<sup>2</sup> (40%

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<sup>3</sup> Malvern Hills AONB Joint Advisory Committee Position Statement 1: Development and Land Use Change in the setting of the Malvern Hills AONB (November 2019).

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of the WNA) is therefore considered for the purposes of assessing housing requirement as being within the Malvern Hills Area of Outstanding Natural Beauty (MH AONB), and development proposals in the remaining 60% of the WNA may be considered to be in the setting of the MH AONB.

### C. iii Other Environmental Considerations - Biodiversity, Habitat

Paragraph 179 of the NPPF notes that. *“To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including ....national and locally designated sites of importance for biodiversity...and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Further, on 11th January 2022, Defra launched its consultation on the Biodiversity Net Gain Regulations and Implementation. The Environment Act 2021 sets out a mandatory requirement for new developments to provide a 10% biodiversity net gain. Mandatory biodiversity net gain will apply in England by amending the Town & Country Planning Act and is due to be implemented in 2023. The newly announced Levelling Up and Regeneration Bill will also have implications for ecological protections.

The WNA includes a number of important sites important for their ecological value, including two SSSIs (Mutlow’s Orchard and Brotheridge Green Disused Railway Line). There are several Local Wildlife Sites in and around Welland, including Welland Cemetery; Mutlow’s Farm Orchard; Castlemorton, Hollybed and Coombegreen Commons; Drake Street Meadow; and Pool and Mere Brooks. There are also some SSSI immediately adjacent the WNA including Castlemorton Common and Malthouse Farm Meadow. A wide variety of protected / notable species of flora and fauna have been recorded in and around the village. European Protected Species identified include peregrine falcon, hobby, nine species of bat, otter, and great crested newt. Some areas of the WNA are designated Priority Habitat Inventory sites, and/or are recorded on the National Forest Inventory. The land allocated for development in the SWDPR (SWDPNEW99 “Lawn Farm III” is in its entirety covered by a Natural England Wildlife Licence or is tussock grassland to be protected and managed as such in perpetuity and is associated with the Licence. Many of the hedgerows are species-rich, and as such are categorised as Habitats of Principal Biological Importance. Some of the older hedges may be categorised as ‘Important’ under the Hedgerows Regulations 1997.

Also relevant to assessing the capacity for housing provision in Welland is the fact that the WNA falls entirely within the proposed Nature Recovery Plan<sup>4</sup> area - *Footnote 62 to Para 179 in the NPPF states that “Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.”*

Existing policy in the SWDP2016 (SWDP22) provides some considerations on these issues for development, but the Environment Act 2021 and 25 Year Environment Plan which are also already in force provide further expectations, including but not limited to onsite biodiversity net gain targets and long term management planning, and these are reflected more comprehensively in both SWDPR26 and also the proposed Nature Recovery Plan and therefore these should also be given some weight in this study. The requirements in all these sources of policy and guidance provide important considerations for all sites in the WNA and impose some specific stringent constraints on development for some sites in the WNA, especially SWDPR26D, *“except where the public benefits of the*

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<sup>4</sup> Malvern Hills AONB Nature Recovery Plan Consultation Draft 6 January 2022

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*development at that site clearly outweigh both its likely impact on the features of the site and any broader impacts on the wider ecological networks, and a suitable compensation strategy exists.”*

Two important points can be lifted from this. Firstly the use of “and” in some of the policy conditions. Both a compensation or mitigation strategy as well as public benefit are required. Secondly is the need to understand the context of what constitutes “public benefit”. This is discussed in some detail within the next subsection.

Finally, it is consistent with the community-consulted Regulation 14 Plan’s vision and objectives to ensure that the protection of ecological assets are prioritised in the Plan’s policies: *Residents and visitors will value and enjoy the landscape and the natural and historic environment of the village; To ensure that the design and location of new development is resilient to the effects of climate change and flooding; to ensure that Welland and its residents exist in harmony with the landscape and with the natural and historic environment; to conserve and enhance biodiversity.*

Conclusion D: All sites, whether an allocation in the SWDPR or the Plan or coming forward as windfall or an RES, would need to conform to national and local policies relevant to conserving and enhancing biodiversity and habitats, including the Malvern Hills AONB Management Plan and its Nature Recovery Plan. However, it should also be noted that specific sites within the WNA are important due to their ecological value and this may further preclude their suitability for housing development under existing and emerging national and local policy or constrain the scale of the capacity for development. This would be more usefully identified during Local and Neighbourhood Planning processes rather than at consideration of planning application and therefore affect the Plan’s housing policies regarding allocation and quantum and also ongoing dialogue with SWCs regarding SWDPR housing allocations and policy. This is not to say that full biodiversity assessments should be undertaken as part of the neighbourhood planning process, but where there is a clearly known and identified constraint that would significantly influence a planning decision, such as the Natural England Habitat licence affecting one of the sites under consideration in the SWDPR (SWDPNEW99), it is reasonable to actively assess and acknowledge this consideration whilst defining the housing requirements for Welland at Local Plan and Neighbourhood Planning stage.

### C. iv Categorizing Welland for Development, “Local Need” and Cumulative Development -

Welland is defined by the SWCs as being in a designated rural area and a Category 1 village, determined by the access it has to a number of services and facilities (as informed by the Village Facilities and Rural Transport Study 2019).

In the SWDP2016, SWDP 2Aiii. provides for the need to “*Safeguard and (wherever possible) enhance the open countryside*” and Policy SWDP 2B states that Welland’s role as a Category 1 Village, when assessing windfall development, will be considered as “*predominantly aimed at meeting locally identified housing and employment needs...*”. The Inspector’s report (dated 4<sup>th</sup> February 2016) examining the SWDP2016 endorsed this settlement hierarchy approach in SWDP2 and noted (para 33) “*it recognises the leading role of Worcester as by far the biggest settlement and provider of services in the SWDP area, and the progressively more local roles played by the main and other towns and the larger villages*” [our emphasis]; the implication being that development in the larger villages should be prioritised for, and providing for, the most locally arising need.

SWDP3 in the SWDP2016 emphasises smaller allocations in Category 1, 2 and 3 villages to “*provide for local needs in the rural areas, together with completions, commitments and overall windfall forecasts*” (our emphasis). This appears to validate the implication in SWDP 2B whereby development in Category

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1 villages – notwithstanding any AONB or its setting status - should be for local need, certainly at least with regard to windfall and RES proposals, but also – potentially – for allocations. Yet, as we will explore shortly, SWDP and SWDPR policy and calculation of IHRs still includes some expectation for Category 1 villages to accommodate some need from across the SWDP area in the form of allocation(s).

Indeed, there seems to be some inconsistency between policies within the same Plans (SWDP and SWDPR) as well as with other policies and guidance documents to which they should be mindful, such as their own Affordable Housing Supplementary Planning document (Oct 2016), NPPF and national and local AONB guidance.

Elsewhere, in the NPPF, reference is made to the concept of “local need” in Paragraph 78: *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”*.

Both the SWDP2016 and the Preferred Options in the SWDPR include a more specific definition as to what they consider constitutes “local need” in their policies for rural exception sites – *“‘local need’ for the purposes of [SWDP 16/ SWDPR18] policy criteria Ai means the parish and adjoining parishes.”*

The MH AONB Management Plan references “local need” in its policy BD3 – *“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”*. Policy officers from both AONBs in the SWDP area are currently communicating with SWDPR planners on how to more appropriately reflect the most recent NPPF changes affecting the AONB and its setting, in the forthcoming Reg 19 document in the SWDPR process. Consequently, the Rural Exception Sites policy (SWDPR 18), and also policies affecting windfall developments, in the examined and adopted SWDPR might include some additional specific provisions for settlements wholly or partly in in an AONB, including some strengthening of the definition of local need for these sites.

The Affordable Housing Supplementary Planning Document (Malvern Hills Council, Worcester City Council, Wychavon District Council) October 2016 helpfully highlights the importance of local housing need and interestingly goes further in recognising the constraints of a Category 1 village such as Welland that is within or next to the AONB - *“3.3 Based on SWDP 2, affordable housing is ...considered to be appropriate in these following locations:...Within the development boundaries of Category 1, 2 and 3 villages; Within the housing allocations in the SWDP whether within or outside the development Boundaries; In locations in line with policy SWDP 16 Rural Exception sites where the affordable dwellings are to meet identified “local housing need”, (see paragraph 3.38) and the location has access to nearby infrastructure and community facilities. This is likely to rule out locations adjacent to lower category villages; within or adjacent to settlements in the Areas of Outstanding Natural Beauty (AONB) in the context of SWDP 16 Rural Exception sites there may be scope for limited affordable housing for proven local needs in line with SWDP 23”*.

The Cotswold Conservation Board (CCB), responsible for a separate AONB within the area covered by the SWDP2016 and emerging SWDPR, provides some information that is helpful for Welland, given its AONB, ecological and other constraints. The CCB notes that ‘housing need’, as calculated using the standard method, is an *unconstrained* assessment of the number of homes needed in an area. In contrast, establishing the ‘housing requirement’ for an area requires consideration of ‘constraints’. As such, there is a clear distinction between ‘housing need’ and ‘housing requirement’ that is important to bear in mind when considering housing policies for the Plan as efforts to accommodate an unadjusted housing need figure potentially risk harming the AONB protected landscape or compromising natural capital or historical assets.

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Often development 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’). The Welland Neighbourhood Planning Group requested an Indicative Housing Requirement (IHR) figure from Malvern Hills District Council (MHDC). The NPPF 67 requires that “...*the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.*” However the IHR for Welland was calculated by MHDC as a proportion, adjusted for population, of the allocated figure for the Category 1 villages for the district as a whole but has not apparently explicitly been adjusted for any latest evidence of *local* housing need. Thus – as suggested earlier – it appears that the SWDPR expects Welland to accommodate some SWDPR area need, and not just local (to Welland) need.

Also, both the SWDP2016 and SWDPR incorporate major developments in Welland in their allocation policies – SWDP59/13, SWDP59I and SWDP59zI, and SWDPNEW99 respectively – that are not specifically determined by local need. Indeed, the justification for these allocations has also been in the form of “apportionment” of district-wide need within the settlement hierarchy structures laid out in the SWDP2016 and SWDPR plans.

The issue of local need was tested thoroughly at both Local Plan examination and at an Appeal Examination relatively recently in West Oxfordshire. During examination of the emerging West Oxfordshire Local Plan in 2018, the Inspector, in a letter dated 16 January 2018, stated that although the AONB does not represent a policy embargo on new housing and that some new housing is appropriate within the AONB, there was little case for the plan to provide more than the 774 committed dwellings within the sub area “*simply to ensure that district-wide housing needs are met*”. He further determined that the four proposed allocations were “*not essential to the soundness of the plan*”. Although the Inspector did not rule out development coming forward on the proposed four sites, his view was that this should be considered through the development management process based on detailed evidence submitted as part of specific planning applications. Another inspector, in a subsequent planning appeal hearing (Ref: APP/D3125/W/18/3209551 Land North of Woodstock Road, Stonesfield), noted that the Council’s position was that the identified housing needs for market and affordable housing in the District were likely to be met without further sites and thus it did not rely on proposals such as the appeal development to meet its housing land supply. The inspector accepted that, district wide, there may be a need for the delivery of more affordable homes. However, in considering the exceptional circumstance test to justify development within the AONB he concluded that he did not consider that “*the evidence before me provides convincing case to demonstrate that the development which includes 34 affordable units is necessary to meet an identified local housing need in Stonesfield*”. Further, without such clear and convincing evidence he suggested the proposed 34 affordable homes could constitute an oversupply.

Welland is in a unique position as probably the only Category 1 village in a designated rural area in the SWDPR area that falls at least partly in the MH AONB<sup>5</sup>. As such – as explored in this section - a number of the existing SWDP and proposed SWDPR policies are inconsistent when applied to Welland. It is not in dispute that, in order to be made, the Plan must be in general conformity with the strategic policies of the SWDP2016 and any examined SWDPR. As such, it will – if the existing preferred options in the SWDPR are adopted - have to accommodate as a minimum the IHR provided of 14 dwellings, in the form of the SWDPNEW99 allocation or alternative(s) provided by the Plan, if accepted.

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<sup>5</sup> It is understood that there are settlements in the same situation however in the SWDPR area that lie wholly or partly in the Cotswolds National Landscape.

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However, an investigation of the preferred approach by policy officers from both AONBs in the SWDP area, national AONB guidance, precedent from the Inspector’s decision at the examination of the West Oxfordshire Local Plan, and also a consideration of NPPF Para 67 and NPPF 78, provides a potentially helpful methodology to identify the housing requirement for Welland that can guide the Plan’s policy development at plan making stage, and focus delivery of the most appropriate homes given the constraints on development in the WNA.

To do this, “local need” – for the purposes of this HEP and to provide an assessment of the housing requirement for Welland – can be interpreted as being, in the first instance, as such need as is arising in the settlement. Evidence of need arising in neighbouring settlements that also lie wholly or partly within the MH AONB would also potentially be relevant for consideration.

This approach has been used in this study to provide evidence for consideration for policy setting for the Plan as it is considered likely to be more aligned with the preferred approach for the assessment of local need in rural villages that are in/partly in the AONB by policy officers in both AONBs in the SWDP area for both windfall and RES developments. The approach is also more consistent with the updates in the NPPF in 2021 regarding development in the AONB and its setting and also national AONB guidance<sup>6</sup>. As such, it is possible that this approach and the policies in the SWDPR may align more closely following the Reg19 process and examination. If they do not, then the methodology still provides benefit in the identification of local housing requirement for the purposes of neighbourhood plan policy development.

Should this definition align in time with examined and adopted SWDPR policies and future MH AONB guidance then only robust evidence that meets this definition should be used in the interpretation and implementation of, the Plan’s policies. In the meantime, it is recommended that this definition of local need to assess the housing requirement in Welland would benefit from being cascaded through all policy and narrative in the Plan in the context of prioritising the focus on homes that are most needed for the local community. Until or if reflected in the adopted SWDPR however, it is accepted that this definition would not preclude the application and interpretation of existing SWDP2016 /other adopted SWDPR policy.

Conclusion E: At the time of writing, MHDC has provided a policy-off IHR for Welland of a minimum of 14 dwellings, the calculation being based on an expectation for Category 1 villages in the SWDPR to contribute to the delivery of district-wide need.

However, the policies in SWDP2016 and the preferred options document for the SWDPR are potentially inconsistent when applied to the WNA. Investigation of the preferred approach by policy officers from both AONBs in the SWDP area, relevant national policy and guidance and precedent from planning inspections, provides an additional toolkit for the HEP to use to identify the housing requirement for Welland which can then inform the Plan’s policy development and more effectively focus delivery of the most appropriate homes given the constraints on development in the WNA.

The HEP has therefore interpreted “local need” for the purposes of providing an assessment of the housing requirement for Welland as being – in the first instance – such need as is arising in the settlement. Evidence of need arising in neighbouring settlements that also lie wholly or partly within the MH AONB would also potentially be relevant for consideration.

Should this definition align in time with examined and adopted SWDPR policies and published MH AONB guidance then only robust evidence that meets this definition should be used in the interpretation and implementation of, the Plan’s policies. Although this definition of local need to assess the housing requirement in Welland would be beneficial to be cascaded through all policy and

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<sup>6</sup> Landscapes for Life – Position Statement: Planning for Housing within AONBs in England; The National Association AONBs

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narrative in the Plan, until reflected in the adopted SWDPR it would not preclude the application and interpretation of existing or adopted SWDP policy, albeit such interpretation is problematic given Welland's unusual status as a Category 1 village that also lies within a protected landscape.

Welland has seen significant development since 2011, the number of dwellings growing by 44.4% over this time. As such, any assessment of housing policies, including the scale and location of development, should therefore also be considered in the context of the cumulative impact of development that has been built or committed to date as well as any evidence of housing need arising for the future sustainability of the community. Given the ongoing impacts of a number of developments and the sensitivity of the landscape, the Parish Council has commissioned three Landscape Sensitivity and Capacity Assessments (2015, 2019 and 2022) to ensure that the recommendations in this study and in the Plan's housing policies appropriately reflect the requirement for the WNA. Other relevant reports, such as the Malvern Hills AONB Environs Landscape and visual sensitivity study (White Consultants for Malvern Hills District Council) May 2019 provide additional helpful information.

Indeed, the Landscape Sensitivity and Capacity Assessments (LSCAs) commissioned during the Plan process, and which are provided as separate background documents to the neighbourhood plan, are a significant part of the plan's evidence base. They are integral to informing the Site Assessment Reports and thus for the specific housing policies allocating development in the neighbourhood plan.

The National Association AONBs, in their "Landscapes for Life – Planning for Housing within AONBs in England", advise that "*decisions on allocating sites within AONBs should be 'landscape led'. This requires a robust understanding of landscape including the key characteristics, history and settlement patterns of the wider landscape. The PPG advises that "To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed. To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used" (Paragraph: 037 Reference ID: 8-037-20190721). These documents need to be supplemented by studies such as historic landscape characterisation. AONB Management Plans are key documents to understanding what makes the area special and therefore what qualities need to be conserved and enhanced when deciding the location, scale and design of new development. Local planning authorities also need to consider the cumulative impact of the proposed sites and such development occurring within multiple Local Plan areas in an AONB.*"

It should be noted that the IHR that has been provided to Welland by MHDC is explicitly a "policy off" figure, with no differentiation as to whether the village has any constraints such as lying within the AONB. Also, all three previously allocated sites in the SWDP2016 have been built out. The allocation in the SWDPR Preferred Options document (SWDP Reallocate 64 for Land Adjacent to the Former Pheasant Inn) has also been built out and so will be removed from the emerging Plan. Finally, there is an indication that MHDC would be willing to swap an alternative site to the remaining allocation in the SWDPR<sup>7</sup> should the Plan propose one in a "made" plan.

The use of LSCAs at the heart of the Plan illustrates the recommended "landscape-led" approach is being adopted in Welland. The capacity to identify and propose alternative allocation site(s) in the

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<sup>7</sup> It should be noted that the current SWDPR allocation (SWDPNEW99) is currently in the setting of the AONB as the SWDPR is not allocating major sites for development within the AONB itself. Neighbourhood planning groups however are able to should there be sufficient evidence to justify doing so, although such allocations would still need to be assessed and considered acceptable and be granted permission at planning application stage.



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SWDPR that would be more appropriate and tailored to the community's needs is enabled by this approach.

Planning Practice Guidance is clear that *“The cumulative impacts of development on the landscape need to be considered carefully.”* (Paragraph: 036 Reference ID: 8-036-20190721) and the MH AONB Management Plan also notes (BDP13) that one of the biggest threats to the AONB comes from the cumulative impact of numbers of small developments. Loss of character through infilling (BDO1, BDP2, BDP6) is also highlighted, stressing that development needs to respect local character, design and the pattern and grain of settlements. Whilst increases in density can help to conserve land resources this will not always be appropriate or acceptable.

The Nov 2019 Malvern Hills AONB Joint Advisory Committee Position Statement 1: Development and Land Use Change in the Setting of the Malvern Hills AONB recommends the introduction of policies in *“statutory plans, including Neighbourhood Development Plans, which protect the setting of the AONB, including policies which seek to protect key views. It also recommends carrying out Landscape Sensitivity and Capacity Assessments to inform the allocation of land for development and to identify sites which have the highest capacity in landscape and visual terms. Such Landscape and Visual Impact Assessment work related to potential development in the area around the AONB must include “a detailed consideration of effects on the designated landscape itself, as well as on views to and from it”.*

A related point is in the NPPF, Para 79, which notes: *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”.* Housing development in Welland needs to be sited such that the community is encouraged to walk and cycle to the village centre facilities rather than resort to the use of a car, whereupon services elsewhere become as convenient.

Interestingly, the Hanley Parish Neighbourhood Development Plan 2019 includes policies which both cap the maximum quantum for any one development, and also introduces a requirement for “phasing” for any developments which, for exceptional circumstances, are larger than this in order to ensure the village(s) in the neighbourhood area can appropriately and sustainably welcome and accommodate the increased number in their communities.

Finally, the Plan's Vision and its objectives, presented in the Regulation 14 consultation, provide relevance to the context of local need and also the impacts of cumulative development: *By 2041 Welland will be a thriving rural village; A range of high-quality homes will be available to meet the local need; to provide new housing to meet local needs; including a greater range of affordable housing for Welland residents; to give preferential access to some new homes for people with a local connection; to ensure that the scale of development is appropriate to the sustainable growth of the village whilst seeking to maintain its rural character; To position development within easy walking distance of village facilities, to ensure that the design and location of new development is resilient to the effects of climate change and flooding; to ensure that Welland and its residents exist in harmony with the landscape and with the natural and historic environment; to protect, enhance and conserve the AONB and its setting, and wider landscape and views; to protect and enhance the historic environment of Welland.*

Conclusion F: Notwithstanding obligations to meet specific allocations and/or IHR provision in any examined and adopted SWDPR, the “landscape-led” approach to identifying potential sites for housing development that the Plan is adopting is endorsed. Quantum, scale, massing, type and location would be better informed through Landscape Sensitivity and Capacity Assessments, alongside the housing



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evidence within this HEP study, and would result in housing policies that are more reflective of the actual housing requirement for the village than the policy-off IHR “need” numbers and the allocated site currently proposed within the SWDPR. In this way, the provisions in the NPPF, and national and local guidance for development in the AONB and its setting and for biodiversity and ecological protections shall be accommodated with specific regard to the local conditions; development will be able to be positioned such that it is most sustainable for community needs, and oversupply and overdevelopment avoided.

### C v. Types of Housing

The National Association for AONB’s Landscapes for Life Report notes that affordability of housing is often an issue for villages within AONBs because they are attractive places and in high demand as locations to live and particularly to retire to. As a result, open market house prices and rents are often out of reach of local people, particularly younger people. This distorts the social balance of communities within AONBs, both in terms of income and age. They argue that the answer to this affordability problem is not building more open market houses which are priced out of reach of younger people and lower income earners.

The SWDP2016 includes policies (SWDP13, SWDP14, SWDP15, SWDP16, and echoed in policies in the SWDPR) that encourage the delivery of a mix of housing types and sizes in market housing, and also “affordable housing” in larger housing sites and rural exception sites.

Interestingly, policies in SWDP2016 and the subsequent provisions in Affordable Housing Supplementary Planning Document (2016) are not consistent with national policy as presented in the NPPF 2021. The thresholds and contributions for affordable housing for settlements such as Welland, in designated rural areas, as set out in Policy SWDP15 in the adopted Local Plan were amended in an Affordable Housing Supplementary Planning Document<sup>8</sup> in 2016 to reflect a change in national policy. More recently, however, the 2021 NPPF Para 64 has introduced further changes, such that housing policies may now include expectations for affordable housing contributions in designated rural areas. Relevant to Welland, the NPPF at paragraph 64 notes that *“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)”*. [our emphasis].

Both the adopted SWDP and its affordable housing supplementary planning document (2016) can therefore be considered as no longer aligned with national policy on affordable housing contributions and thresholds as set out in the NPPF. The SWDPR preferred options policy SWDPR14 looks as if it seeks to redress this inconsistency and it is therefore reasonable to include a consideration of these emerging provisions in this circumstance.

The Reasoned Justification for the preferred options SWDPR document policy SWDPR 13 notes that household sizes continue to reduce and that the SWCs are keen to ensure that sites of 5 dwellings or more continue to offer a range of market housing including for single, couple and smaller households – *“Prior to the adoption of the SWDP, many developers relied on the affordable housing element to meet the needs of these smaller households and built larger more executive style market homes, which led to the needs of many households in south Worcestershire not being adequately met.”*

Although the SWCs policies for affordable housing provision express a preference for social rental homes and also provision for the properties remaining affordable in perpetuity and being provided on site (rather than compensation provided for off site delivery), in reality, such affordable housing can

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<sup>8</sup> <https://www.swdevelopmentplan.org/publications/supplementary-planning-documents/affordable-housing-spd>

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still be up to 80% of market sale or rental costs, which remains unaffordable for a large proportion of Welland's community. Some of the homes may also not remain "affordable in perpetuity". The government's initiative for "First Homes" that is incorporated into the proposed SWDPR policies is an example. Developments are allowed to reduce the number of the more affordable home tenures if necessary, in order to enable a development to be financially viable but the most recent NPPF changes affecting the AONB and its setting may influence a strengthening of policy, in any examined and adopted SWDPR process, such that there is a stronger expectation for the delivery of 100% affordable homes, and potentially an introduction of a maximum allowable percentage for market homes, than for sites without protected landscape status.

Planning Policy Guidance states that "*Depending on the content of relevant strategic policies in the local plan or spatial development strategy neighbourhood plans may be able to vary the types of affordable housing that will be expected, or to allocate additional sites that will provide affordable housing, where this will better meet the needs of the neighbourhood area*". (Paragraph: 017 Reference ID: 70-017-20210524). This is echoed in the SWDP15 which notes a baseline level of affordable housing provision that local communities may choose to supplement on other sites, for example as part of their involvement in the neighbourhood planning process, or through the Rural Exception Site process. The draft SWDPR 14 (Meeting Affordable Housing Needs) also suggests some opportunity for the Plan, saying that the number, size, type, tenure and distribution of affordable dwellings to be provided will be subject to negotiation, dependent on recognised local housing need (including the need of older residents and residents with special needs), specific site and location factors.

Given the inconsistencies between adopted plan and national policy, it is not unreasonable to conclude that the Plan should deviate from proposed SWCs policies where this aligns more effectively with latest national policy and where there is evidence that such deviation will better meet the needs of the neighbourhood area; this could be for example in terms of the expected housing tenure split and types where there is robust supporting evidence as is the case in Welland, set out in the HEP and this Appendices document.

The Government's Planning White Paper (2020) states that 'the whole purpose of National Parks would be undermined by multiple large scale housing developments'. 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*'. AONBs have the same level of protection as National Parks, with regards to conserving and enhancing landscape and scenic beauty. The NPPF now also requires that the scale and extent of development in AONBs (as with National Parks) should be limited and, as such, it is logical therefore to apply the same principles, outlined above for National Parks, in AONBs as well. The need to provide more affordable housing for communities in an AONB is also addressed in the proposals of the Government-commissioned Landscape Review Final Report (commonly referred to as the Glover Review / Report).

The Plan's policies and their interpretation will need to be mindful also of expectations in the SWDPR (SWDPR 15) for a percentage of self-build properties on proposals of 20 dwellings or more "*unless demand identified on the LPA Self-Build and Custom Housebuilding Register, or other relevant evidence, demonstrates that there is a lower level of demand for plots.*", and of SWDPR22A whereby "*The provision of housing suitable for the needs of older people will be required on all allocated and windfall sites of five units or more as part of the market housing mix through policy SWDPR 13 and affordable housing mix through policy SWDPR 14*", and also the most recent Affordable Housing Supplementary Planning Document. This will be updated to contain further detailed advice on how the SWDPR policies will be applied, including levels of off-site contributions, the circumstances that

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may justify an off-site contribution, local connections and the procedures to be followed when a planning application is submitted.

It should be noted that from 28 December 2021, a minimum of 25% of all affordable housing through developer contributions in SWCs must be delivered as First Homes. First Homes is a Government initiative that aims to provide a new model of affordable housing to help aspiring homeowners get on the property ladder with a house, with at least a 30% discount on open market value. On 24 May 2021, the Government published new Planning Practice Guidance and a Written Ministerial Statement setting out how it expects First Homes to be delivered. The Planning Practice Guidance sets out the main requirements for First Homes:

- *They must be discounted by at least 30% against open market value (although higher discounts of 40% or 50% can be applied through Local Plans or Neighbourhood Plans where supported by evidence);*
- *Prices to be capped at no more than £250,000 (nationally excl Greater London) after the discount (although lower price caps can be applied through Local Plans or Neighbourhood Plans where supported by evidence);*
- *First and subsequent sales must be to households meeting national eligibility criteria, with optional local criteria (e.g. local connection or occupation criteria); and*

In policy terms, the Government expects a minimum of 25% of all affordable housing through developer contributions to be First Homes, to be delivered on-site unless off-site provision or financial contributions can be robustly justified. The national PPG states the following for applying to existing policies: *'Once a minimum of 25% of First Homes has been accounted for, social rent should be delivered in the same percentage as set out in the local plan. The remainder of the affordable housing tenures should be delivered in line with the proportions set out in the local plan policy.'* SWCs currently seek 80% social rented and 20% intermediate/home ownership tenures, as set out in the Affordable Housing Supplementary Planning Document. With the introduction of First Homes this is now not possible (as 80% social rent would mean only 20% First Homes could be delivered), social rent must therefore reduce to 75% to ensure that we can obtain 25% First Homes. Therefore, 25% of developer contributions should be provided as First Homes, and all remaining dwellings should all be social rented, unless there is a demonstrated need for an alternative affordable housing tenure split.

Finally, in the Plan's vision and its objectives, there is a relevant focus that must be borne in mind: *By 2041 Welland will be a thriving rural village; a range of high-quality homes will be available to meet the local need; to provide existing and future residents with the opportunity to live in a high quality home that meets their needs; to provide new housing to meet local needs; including a greater range of affordable housing for Welland residents; to provide a mix of housing types including smaller homes for older residents wishing to downsize and for young singles, couples or families needing their first home; to position development within easy walking distance of village facilities; to integrate market and affordable housing to encourage the concept of a "balanced community"; to provide homes for younger people and young families and so counter the growing demographic imbalance.*

Conclusion G: Both SWDP2016 and the subsequent provisions in Affordable Housing Supplementary Planning Document (2016) are not consistent with latest national policy. Given the number of constraints in the WNA, including the increased sensitivity and reduced capacity for development as a cumulative effect from the scale of house-building over the last decade, the Plan may wish to consider engaging the ability under NPPF Para 64 and PPG (Paragraph: 017 Reference ID: 70-017-20210524) to have policies that apply to very small housing developments and also which deviate from the housing tenure split and types proposed in the SWDP and SWDPR in order to deliver housing better aligned with evidenced local need and which is better designed for the longer term needs of

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the community so long as such deviations are justified under local and national policy and guidance and are accepted by the SWCs. This could include allocation(s) for 100% affordable housing.

### C vi. Other Relevant Policy /Context

None of the area to be covered by the Plan is a designated Conservation Area however the WNA does include a number of Grade II listed buildings which are designated heritage assets. The importance of the character of Welland as a rural village is also vitally important, and the findings in the Landscape Sensitivity and Capacity Assessment and community responses to the Regulation 14 consultation are important considerations.

Welland has a number of orchards. The MH AONB Management Plan notes that *“traditional orchards within settlements and at the settlement edge are often at risk from development. Traditional orchards are priority wildlife habitats and significant cultural heritage features. They may also contribute positively to meeting current community needs and aspirations. Permission for development should usually be refused on these sites in the AONB.”*

Some areas within the WNA are prone to flooding and this may limit suitable sites for development, as per SWDP28 and SWDPR32.

Policy SWDPR 24B addresses extensions to residential curtilages and states that they will *“be resisted in ....Areas of Outstanding Natural Beauty, and where the extension would see the loss of Protected Open Space (in part or full), unless supported by other relevant policies.”*

Another emerging area of legislation is that arising from the Levelling Up White Paper. In this, ensuring natural beauty is accessible to all is considered central to our planning system, with improved Green Belts around towns and cities, supported by Local Nature Recovery Strategies reflected in plan making, and woodland creation supported across the UK. Building on this White Paper, a second report will be published on rural proofing in England this Spring (2022). This report will set out how government departments are working to support levelling up in rural areas, through targeted approaches where needed, and how it is strengthening the rural economy, developing rural infrastructure, delivering rural services and managing the natural environment.

Finally, relevant objectives and statements in the Plan’s Vision include: *residents and visitors will value and enjoy the landscape and the natural and historic environment of the village; to position development within easy walking distance of village facilities; to ensure that the design and location of new development is resilient to the effects of climate change and flooding; to ensure that Welland and its residents exist in harmony with the landscape and with the natural and historic environment; to protect and enhance the historic environment of Welland; to conserve and enhance biodiversity.*

Conclusion H: Further constraints to development (including quantum/scale and location ) that must be considered in identifying capacity for housing in the WNA (and therefore influencing the overall housing requirement for Welland) include, but are not limited to the protection of orchards, flood risk, impact on designated heritage assets and the impact on the character of Welland as a rural village sitting partly in the MH AONB.

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### Appendix D: Policy & Guidance relevant to housing development in an AONB & its Setting, including commentary.

The Countryside and Rights of Way (CRoW) Act 2000 states that local planning authorities have a statutory duty to have regard to the purpose of AONB designation in exercising or performing functions in relation to, *or so as to affect*, land in these areas (Section 85). This is intended to ensure that the purpose of the AONB designation is recognised as an essential consideration in any decisions that impact on the AONB, whether **inside or outside** the area, with the expectation that adverse impacts will be avoided or mitigated where possible.

The NPPF 175 – 177, including (176) *“Great weight should be given to conserving and enhancing landscape and scenic beauty in ....Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues....The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.”* And (177) *“When considering applications for development within .... Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) 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; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”* Footnote 60 regarding paragraphs 176 and 177 *“..whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”*

Specifically with regard to housing quantum, paragraph 11 of the NPPF states that strategic policies should provide for objectively assessed needs for housing and other uses **unless** the application of the policies within the Framework that protect areas or assets of particular importance, such as an Area of Outstanding Natural Beauty, provides a strong reason for restricting the overall scale, type or distribution of development on the plan area.

Further, Planning Practice Guidance states *‘The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas’* Paragraph: 041 Reference ID: 8-041-20190721

SWDP2016 Policy SWDP 3 makes the case for redirecting some allocations and development outside of the protected landscapes, acknowledging the need to respect key natural and environmental assets and to “damp down” the historic trend of large-scale net in-migration into the Malvern Hills settlements in the Sub Area which has put pressure on that local housing market

The SWDP2016 Policy SWDP23 states that *“ A. Development that would have a detrimental impact on the natural beauty of an AONB (as shown on the Policies Map) will not be permitted. B. Any development proposal within an AONB must conserve and enhance the special qualities of the landscape. And C. Development proposals should have regard to the most up-to-date approved AONB Management Plans.”* The policy justification acknowledges that the Malvern Hills Areas of Outstanding Natural Beauty is a nationally important landscape which needs to be conserved as

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indicated in the NPPF and notes that AONBs are designated under the same legislation as National Parks. Local Planning Authorities must take AONB management plans into account in their consideration of development proposals in the AONBs and acknowledges that the nature of the topography is such that even small-scale development can have a significant visual impact on the principal attributes of an AONB. Although the SWDP2016 includes several housing allocations in settlements that fall in or partly in the AONBs, it states that further non-planned i.e. “windfall” development within the AONBs, particularly on land beyond a development boundary “*will be rigorously assessed*”. Further, any windfall development within settlements will be rigorously assessed against the policies of the Plan and the relevant legislation. The importance of the setting of the AONB is also noted – “*For development outwith but affecting an AONB, regard should be had to the purpose of conserving and enhancing its natural beauty*”.

Interestingly point 4 of the reasoned justification associated with SWDP23 states that “*The Strategic Housing Land Availability Assessment demonstrates sufficient potential housing land capacity beyond the AONBs, so it is considered that there is no overriding justification for large-scale unallocated development in these protected landscapes*”.

The proposed policy for the same issue in the SWDPR 27 goes further than the SWDP2016: “*A. Major development proposals within the AONB will not be permitted [NPPF Footnote 60 is also noted as applying]. B. Minor development proposals within the AONB will be supported provided that it can be demonstrated that they will conserve and enhance the special qualities of the landscape and there would be no detrimental impact on tranquillity and natural beauty of the local area. C. Development proposals within the AONB must demonstrate that they will conserve and enhance the special qualities of the landscape. D. Development proposals should be supportive of the latest published AONB Management Plans and associated design guidance. E. Development Proposals which could have a detrimental impact on the setting of an AONB will in the first instance have to submit a Landscape and Visual Impact Assessment (LVIA)*”.

The reasoned justification again endorses the view that the nature of the topography is such that even small scale development can have a significant visual impact on the principal attributes of an AONB - “*Although the plan includes several housing allocations at settlements within the AONB, further non-planned, i.e. 'windfall' development within the AONB, particularly on land beyond a development boundary will be rigorously assessed. Any windfall development within settlements will be rigorously assessed against the policies of the Plan and the relevant legislation. For development outwith but affecting an AONB, regard should be had to the purpose of conserving and enhancing its natural beauty.*” Further, it continues to assert, as did the SWDP2016, that the “*Strategic Housing Land Availability Assessment demonstrates sufficient potential housing land capacity beyond the AONB, so it is considered that there is no overriding justification for large-scale unallocated development in these protected landscapes*”. It also states this alongside “*Land within the setting of AONB often makes an important contribution to maintaining their natural beauty. Poorly located or badly designed development can do significant harm to an AONB.*” This is an interesting development on the previous phrasing in the SWDP2016 and recognises the impact even small scale developments can have on views both to and from an AONB (and both are considered highly relevant), and thus potentially adversely affecting the special qualities of that AONB.

It is therefore somewhat confusing as to why there is any allocation for Welland as a Category 1 Village in the SWDPR in light of these proposed policies, given the village is also rather uniquely partly in the AONB and when sufficient capacity is admitted as lying elsewhere and other factors such as biodiversity and habitat protection apply. Further, although not currently a policy requirement under SWDPR2, no robust or specific evidence of local need is associated with the allocation, which could provide complications at planning application.

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The Malvern Hills AONB Management Plan 2019-2024 requires that planning and development meets the needs of local people and respects the character and distinctiveness of the landscape, that communities take a full and active part in the planning process, that new development is sustainable and to a high standard of design which enhances local distinctiveness, for example, using local materials and through informed use of colour and that the quality of the setting of the AONB is conserved, enhanced and celebrated. It notes (with policies BDP4, BDP14) that the Malvern Hills are very visible in the wider landscape and the higher ground of the AONB often affords good views out. Planning policy and decisions on planning applications should take account of the importance of the setting of the AONB, including views (both short and long distance) both to and from the AONB. The Malvern Hills AONB Partnership has published '*Guidance on identifying and grading views and viewpoints*'. This aims to help developers evaluate the importance of relevant views in and around the AONB and is intended to help make a judgement on whether the change to views caused by a proposed development is likely to be acceptable.

Specific MH AONB Management Plan policies are:

- BDO1 The distinctive character and natural beauty of the AONB will be fully reflected in the development and implementation of consistent statutory land use planning policy and guidance across the AONB, and in decision making on planning applications for development.
- BDP1 Allocations of land for development in the AONB and its setting should be informed by Landscape Sensitivity and Capacity Assessments and/or Landscape and Visual (Impact) Assessments, as appropriate.
- BDP2 Development in the AONB and its setting should be in accordance with good practice guidance including that produced by the AONB Partnership.
- 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.
- BDP4 Development proposals that may affect land in the AONB, including those in its setting, should protect and/or enhance key views and landscape character. AONB guidance relating to views and development in views should be used where relevant.
- BDP6 There should be a presumption against the loss of traditional orchards to development, or changes to other uses.
- BDP13 The cumulative impact of small-scale change and development will be monitored. Data gathered will be used to inform decisions and to revise and/or develop policy.
- BDP14 In the setting of the AONB, Local Planning Authorities should consider identifying locally important landscape areas to conserve the special qualities and features of the AONB and their enjoyment by people.

Planning Practice Guidance notes that although management plans for AONBs do not form part of the statutory development plan, they do contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications. (Paragraph: 040 Reference ID: 8-040-20190721 Revision date: 21 07 2019). Further, the SWDP23 and SWDPR27 explicitly state that planning policies (including their own) and planning applications must have regard to and support the provisions in the AONB Management Plan and associated guidance. The Cotswolds Conservation Board (CCB) Housing Position Statement April 2021 is therefore a material consideration in any current interpretation of SWDP2016 policy and also could influence the final provisions in the SWDPR, thereby subsequently potentially indirectly influencing policy for villages such as Welland in the AONB and its setting.

The Government's response to the Landscapes Review (National Parks and AONBs) 15 January 2022 clearly indicates further current and future strengthening of protections for the AONB and its setting: "*We agree...that the current statutory purpose to 'conserve and enhance' is not strong enough....We*

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*will therefore strengthen this purpose, making it clear that we need to actively recover nature in these areas, rather than simply conserve what remains”. “As part of planning reform, we intend to review the NPPF, and we will further consider how policy for protected landscapes is set out.” “AONB teams ...role in the planning system should be strengthened”. “We will continue to monitor the use of permitted development rights in protected landscapes ,and identify future opportunities to review their use”.*

November 2019 Malvern Hills AONB Joint Advisory Committee Position statement 1: Development and Land Use Change in the Setting of the Malvern Hills AONB explains that the setting of the Malvern Hills AONB can be defined as the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Malvern Hills AONB and/or on peoples’ enjoyment of it. Helpfully it lists some examples of adverse impacts on the setting of the Malvern Hills AONB. These include: development which would have a disruptive visual impact on views out of the AONB, into the AONB or between parts of the AONB, including consideration of the cumulative effect of several similar forms of development; loss of tranquillity through the introduction or increase of lighting and or noise (including consideration of the cumulative effect of several similar forms of development); loss or harm to heritage assets and natural landscape, particularly if these are contiguous with the AONB; impact on special associations and interrelationships of settings (for example between the Malvern Hills AONB and Bredon Hill or the Cotswolds Escarpment); change of use of land where of a significant enough scale to cause harm to landscape character; development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB (resulting in loss of tranquillity and erosion of the character of rural roads and lanes); inappropriate use of external materials, external colours, reflective surfaces, and inappropriate landscaping.

Further, it recommends that The Malvern Hills AONB Joint Advisory Committee supports the following:

- *Introduce policies in statutory plans, including Core Strategies and Neighbourhood Development Plans which protect the setting of the AONB, including policies which seek to protect key views.*
- *Carry out Landscape Sensitivity and Capacity Assessments to inform the allocation of land for development/identify sites which have the highest capacity in landscape and visual terms. Ensure that Landscape and Visual Impact Assessment work related to potential development in the area around the AONB includes a detailed consideration of effects on the designated landscape itself, as well as on views to and from it. There is also Malvern Hills AONB Guidance on Identifying and Grading Views and Viewpoints.*

An Independent Review of Housing in England’s Areas of Outstanding Natural Beauty 2012-2017 FINAL REPORT NOVEMBER 2017 Prepared by: David Dixon, Neil Sinden and Tim Crabtree found that there was a growing number of planning applications for housing within AONB designated areas as well as in the setting of AONBs between 2012-2017 and urged that Neighbourhood Planning processes draw on advice from AONB teams and connect strongly to the special qualities of the AONB explained in AONB management plans.

SWDPR 2A in the preferred options document for the SWDPR states that the Spatial Development Strategy is based upon the following principles:....”*iii. Safeguard the essential attributes of the Areas of Outstanding Natural Beauty and ensure that, wherever possible, development enhances them.*”

The Landscapes for Life – Position Statement: Planning for Housing within AONBs in England by The National Association of AONBs provides some further helpful information. It notes that *“Part of the consideration of the appropriate level of housing within an AONB will be assessing potential sites for*



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*allocation. This will normally be undertaken as part of the Strategic Housing and Economic Land Availability Assessment process. However, for sites within an AONB this assessment should be expanded to take into account the impact of potential sites on the purposes of the designation, taking into account the relevant AONB Management Plan". It recommends that "Decisions on allocating sites within AONBs should be 'landscape led'. This requires a robust understanding of landscape including the key characteristics, history and settlement patterns of the wider landscape. The PPG advises that "To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed. To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used" (Paragraph: 037).*

The Landscapes for Life report also explained that impacts will not just be confined to the visual or physical effects such as on habitats or watercourses connecting the AONB with its surroundings, but will also add to the visitor numbers using the AONB and the traffic travelling through it, affecting the sense of naturalness, remoteness, tranquillity and dark skies.

Many of the points noted in the Landscapes for Life report are being proposed in policy in the SWDPR (policy SWDPR 27), such as excluding major build in the MH (and Cotswold) AONB and LVIA's to assess impacts of potential development in the setting of an AONB. However, the SWDPR still proposes an allocation at a site within the setting of the MH AONB (SWDPNEW99), within a settlement (Welland) that itself lies partly in an AONB.

The Landscapes for Life report also helpfully recommends three tests when applied at Local Plan stage, but which can usefully and logically also be used in this study and for the purposes of the Plan:

- Test a) it should not be assumed that general housing needs must be met within the AONB. The assessment should rather be based on robust evidence that directly relates to the AONB and relevant settlements within it. This is supported by the findings of the Inspector for the West Oxfordshire Local Plan, who recommended deleting four allocations in the Burford – Charlbury sub-area, which forms part of the Cotswolds Area of Outstanding Natural Beauty (AONB) on the basis that there was no housing need figure for this specific sub-area and that that *"soundly-based decisions on the balance of the benefits and harms of further housing development in this area can only reasonably be reached based on the detailed evidence submitted as part of specific planning applications"*.
- Test b) should robustly explore all available options outside the AONB, and whether the need can be met in another way, such as on smaller sites within the AONB.
- Test c) can be harder to apply at Local Plan stage when the details of the scheme are not known, but sites that are significantly constrained by environmental, landscape or recreational factors should be avoided. Landscape Capacity / Sensitivity Studies and Landscape and Visual Impact Assessments carried out in the context of Strategic Environmental Assessments or Sustainability Appraisals can be useful tools to inform this test if used alongside other relevant evidence such as ecological and heritage studies.

This is why this HEP study must also cross reference to the outcomes of the Landscape Sensitivity and Capacity reports and Site Assessment Reports, and the cumulative impacts and context of previous development in the WNA, as these may highlight a limit on capacity for housing requirement that in turn provides reasoned cause for the housing needs methodology that would best be adopted for this HEP.

The Malvern Hills AONB Management Plan 2019-2024 acknowledged that there is a need to provide affordable housing within the AONB. However, it stressed this should not be at the expense of landscape character. Local authorities complete 'need assessments' for affordable housing and reflect the findings in their local plan. However, when evidence is developed at the county level the needs of

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each parish are not always identified. The Malvern Hills AONB Management Plan notes that there is a risk that too few affordable houses will be built in the AONB without proactive intervention. It suggests the allocation of land for new development within and adjacent to the AONB has not always been preceded by a proper consideration of its effects on landscape character and visual amenity, leading to developments that compromise the integrity of the AONB and people's enjoyment of this nationally designated landscape. It cites some initiatives and mechanisms to address this, such as the South Worcestershire Councils Landscape Sensitivity and Capacity Study and the Natural Capital Planning Tool (which allows an assessment of the likely impact of proposed plans and developments on the natural and cultural capital of the AONB and the services they provide).

The assertion that distant as well as short range views are important and affect the AONB - can be further evidenced. Planning Practice Guidance states that *"Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account."* (Paragraph: 042 Reference ID: 8-042-20190721 Revision date: 21 07 2019).

This is certainly applicable to Welland - the White Consultants study for MHDC noted the view from Pinnacle Hill *"In the foreground the Three Counties Showground is noticeable. The settlements of Hanley Swan and Welland are apparent with Upton further away. Straight roads leading to Hanley Swan and north of Welland, as well as a well-wooded dismantled railway line are noticeable features crossing the regular fieldscape of the Enclosed Commons."* Notably, it also highlights the view to Welland as one of the highest density of exceptional views in a 2009 study by the Cooper Partnership. The Malvern Hills AONB Management Plan 2019-2024 also notes: *'The Malvern Hills are very visible in the wider landscape and the higher ground of the AONB often affords good views out. The contribution of setting to the significance of the AONB is often expressed by reference to views.'* And *"Planning policy and decisions on planning applications should take account of the importance of the setting of the AONB, including views (both short and long distance) to and from the AONB."*

The newly announced Levelling Up and Regeneration Bill includes a focus on development in AONBs and their setting. This is not yet adopted but will undoubtedly have implications for development in the WNA.

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## GLOSSARY

AONB – Area of Outstanding Natural Beauty  
CCB – Cotswolds Conservation Board  
HNS – Housing Needs Survey  
LSCA – Landscape Sensitivity and Capacity Assessment  
MHDC – Malvern Hills District Council  
NPG – Welland Neighbourhood Planning Group  
NPPF – National Planning Policy Framework  
PPG – Planning Practice Guidance  
RES – Rural Exception Site  
SEA – Strategic Environmental Assessment  
SWC – South Worcestershire Councils  
SWDP2016 – South Worcestershire Development Plan adopted in 2016  
SWDPR – South Worcestershire Development Plan Review undergoing Reg19 consultation in 2022  
“the Plan” – The Welland Neighbourhood Development Plan being submitted for examination  
WHNA – The 2021 Housing Needs Assessment produced by Aegon and commissioned by conducted for Welland Parish Council, published as part of the Regulation 14 consultation process to inform the neighbourhood plan  
WNA – Welland Neighbourhood Area