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charity

# Beauty still betrayed

The state of our AONBs 2021

April 2021





## Beauty still betrayed: State of our AONBs 2021

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### Executive summary

Areas of Outstanding Natural Beauty (AONBs), are some of the UK's most distinctive and cherished landscapes. Despite this, for several years there have been concerns about an ambiguity in the policy wording that underpins the planning protection for AONBs. This is leading to local authorities finding difficulty in applying weight to the AONB designation under the pressure placed on them to find land for housing to meet 'objectively assessed need'.

This report from CPRE, the countryside charity, highlights the extent of the threat facing England's 34 AONBs as a result of unsuitable housing developments. The main findings are:

- **The threat to AONBs from development is increasing with pressure targeted on the south east and south west of England.** Since 2017/18, an average of 1,670 housing units have been approved on an average of 119 hectares (ha) of greenfield land within AONBs each year. This is an average increase of 27% and 129% from the five years leading to 2017, respectively. Housing pressure in the south east and south west is most intense, with 85% of greenfield housing units being granted in AONBs in these regions.
- **The majority of planning applications on greenfield AONB land are allowed, and are being built at low densities; they are also not providing the affordable homes that rural communities need.** On average, 80% of planning applications on greenfield AONB land are given permission. The density of housing on greenfield AONB land is on average just 16 dwellings per hectare, the focus of which is largely on building 'executive' houses with only 16% of all homes built being considered as affordable by the government's definition.
- **High housing pressure is also being translated to land around AONBs,** with houses built in the setting of AONBs increasing by 135% since 2012/13.

To ensure that these special landscapes are safeguarded and are receiving the highest level of protection against development, CPRE recommends:

- A new requirement for the government and local planning authorities to maintain and publish annual information on the **number of housing units that are permitted or refused in AONBs, and the amount of land developed for housing.**
- **Prioritising small scale affordable and social homes for local people,** held by the community in perpetuity, on sustainable AONB sites.
- The public interest in **conserving and enhancing AONBs should be prioritised** over meeting and delivering on local plan housing targets.
- **AONB partnerships should be treated as statutory consultees** on major developments within or in the setting of AONBs, with a requirement for local authorities to give weight to their advice.
- The **NPPF should be strengthened** to prevent high levels of development in the setting of AONBs, all of which should be of a sensitive scale, location and design and only be permitted if it results in no adverse impacts on the AONB.

## 1. Introduction

Areas of Outstanding Natural Beauty (AONBs), are some of the UK's most distinctive and cherished landscapes. With England having 34 of the UK's 46 AONBs, they are one of our countryside's 'jewels in the crown', and with millions of people visiting these areas each year, they are clearly regarded as such. While their beauty is recognised as a treasured national resource, AONBs are also home to vibrant rural communities and businesses, the success of which are interdependent on the conservation and enhancement of these landscapes.

Designated for their natural beauty, wildlife, cultural heritage and recreational opportunities, AONBs are safeguarded in the national interest, which means that – alongside National Parks – they are offered the highest level of protection from development. However, for several years there have been concerns as to an ambiguity in the policy wording that underpins the planning protection for AONBs.

AONBs, especially those in the south east and south west of England, are under considerable and growing pressure from large scale housing development. Local planning authorities (LPAs) often find difficulty in interpreting and applying weight to the AONB designation under the pressure placed on them by the government to find land for housing to meet 'objectively assessed need' as set out in national planning policy. This has, in CPRE's view, resulted in a shift in planning priorities from landscape protection to addressing the housing shortage and boosting supply. While we recognise that homes need to be built to meet the needs of communities, we have seen repeatedly that this is not the case when the numbers of houses built is the focus.

Needless development in AONBs is a direct threat to the statutory-purpose of AONBs which is to 'conserve and enhance natural beauty'. Any development should happen with the upmost sensitivity to the needs of agriculture, forestry and other rural industries, as well as the economic and social needs of the local communities.

As well as the statutory purposes of AONBs, we gain several kinds of benefits from protecting these areas and these benefits should not be overlooked. The conservation and enhancement of England's countryside is crucial in terms of mitigating the effects and extent of climate change through carbon sequestration. More natural environments also provide a space for nature, and a high bar in terms of environment quality in which environmental enhancement can begin. There is also a clear public appreciation of green space and countryside for the health and wellbeing of people, as demonstrated by recent research by CPRE. This showed that 59% of people reported they are more aware of the importance of green spaces for our mental health and wellbeing since the coronavirus pandemic. In addition, over two-thirds (67%) of adults think protecting and enhancing these areas should be a higher priority after the pandemic.<sup>1</sup>

This report from CPRE, the countryside charity, examines the extent of housing development taking place in and around England's AONBs between 2017 and 2021. We also look into how AONB housing developments have provided for local communities in terms of affordable housing provision, as well as highlighting which regions are most under threat.

## 2. Development in AONBs

The National Planning Policy Framework (NPPF), the rules under which planning is carried out, says that: 'Great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty.' But despite having the highest level of

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<sup>1</sup> CPRE (2021): <https://www.cpre.org.uk/about-us/cpre-media/pressure-on-green-belt-quadruples-since-2013-says-cpre/>. Accessed 22/03/21

planning protection, AONBs have long been seen as under significant pressure as government policy forces local authorities to prioritise housing numbers over landscape protection.

Our analysis shows that AONB land has been the target of high and sustained development pressure since 2017/18, with the average number of units granted each year being higher than reported in the previous report period.<sup>2</sup> This development pressure has largely been focused on greenfield land, a trend that has remained constant since 2017/18 (section 2.1). However, brownfield land within AONBs is seeing a reduced pressure, with application submissions declining, while the proportion of applications approved (section 2.2) demonstrate a preference for greenfield development in AONBs.

Despite the argument that development is needed in AONBs to meet high and increasing housing targets, particularly in the south east and south west (section 2.3), we also show that the houses that are being built do not use the land efficiently, nor are they providing for the needs of the area's local communities (section 2.4).

## 2.1 Development on greenfield land

In planning policy, AONBs are offered the highest level of protection. However, our analysis shows that 5,681 housing units have been approved on 403 ha of greenfield land within AONBs from 2017/18 to August 2020 (Table 1). This result equates to an increase in the number of housing units being approved on greenfield AONB land since our previous report<sup>2</sup> to an average of 354 units each year. In addition to this, there has also a noticeable increase in the hectareage being used for these developments since the previous report period. Between 2012 and 2017, an average of 52ha of AONB land was used for housing developments every year, whereas that average has now increased to 119ha<sup>2</sup>. It is also worth noting that the estimates of units and hectares used per year are likely to be conservative due to the analyses only picking up developments that were of 10 units or more.

While the yearly average number of homes has risen with the increase in the average hectares, the density of homes being built on AONB land remains pitifully low at just 16 dwellings per hectare in comparison to the national average density of 31.<sup>3</sup>

The number of planning applications on greenfield AONB land since 2017/18 also remained at a sustained level with 2,315 submitted in 2017/18, only reducing slightly in 2019/20 to 2,286. However, with only the first 5 months of 2020/21 reported, but with 967 submissions, this year is on track to have the highest number since 2017/18, suggesting a gradual rise in the number of planning proposals being submitted on AONB land by developers. This is in contrast to the reducing trend we observe in brownfield land planning proposals which have decreased by 62% since 2017/18 (Table 2).

Despite national planning policy provisions for the protection of AONB land, we can see here that developers continue to submit planning applications on AONB land. One reason for this may be due to the fact that

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<sup>2</sup> CPRE (2017), Beauty Betrayed: <https://www.cpre.org.uk/wp-content/uploads/2019/11/Beauty-betrayed.pdf>. Accessed 08/04/21

<sup>3</sup> MHCLG (2019), Table P330 - Live tables on Land Use Change Statistics: 2017-2018 residential address change: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics>. Accessed 08/04/21

since 2017/18, an average of 80% of all greenfield AONB housing development applications have been granted planning permission (Table 1).

**Table 1.** The number of housing units proposed in planning applications submitted and subsequently granted between the financial years 2017/18 up to August 2020, the total hectares of land granted permission and the average density per hectare of dwellings. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis

Financial year	Submitted	Granted	Granted Area (ha)	Proportion units Granted (%)	Average density (dph)
2017/18	2,315	1,866	92	81	23
2018/19	1,519	1,228	85	81	14
2019/20	2,286	1,856	184	81	10
2020/21*	967	731	42	76	17
<b>Total</b>	<b>7,087</b>	<b>5,681</b>	<b>403</b>	<b>-</b>	<b>-</b>
<b>Yearly average (to August 2020)</b>	<b>2,084</b>	<b>1,670</b>	<b>119</b>	<b>80</b>	<b>16</b>

\*Financial year data from April to August 2020.

## 2.2 Development on brownfield land

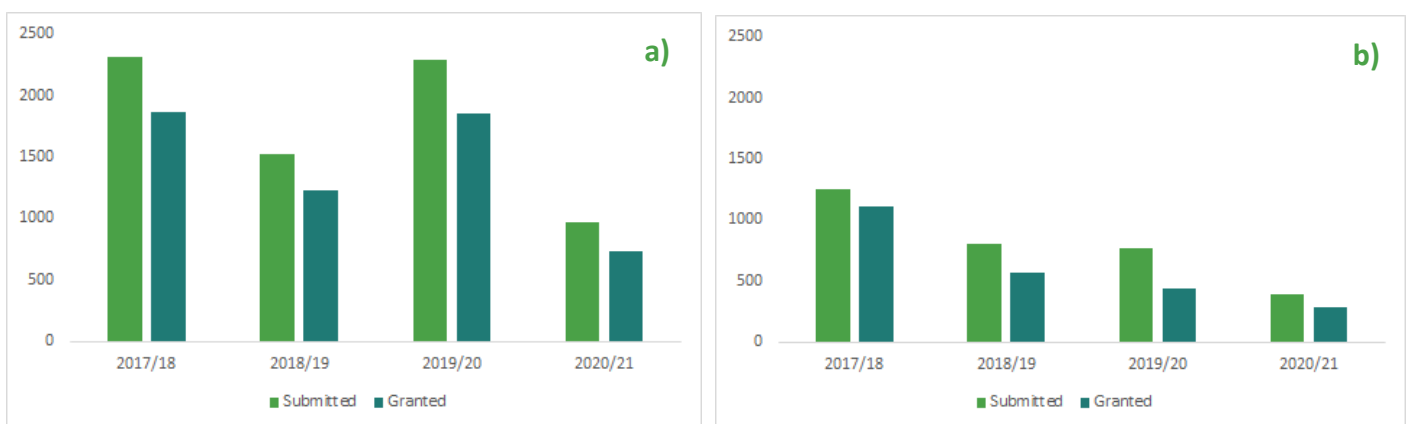
Brownfield land is land that has been built on previously. CPRE has shown that there is space for over one million homes on brownfield land across England, and that it's a perpetually regenerating resource. Most brownfield sites are in urban areas. By building homes on brownfield land and, more specifically, brownfield sites within urban areas, we can build the homes we need in places that already have existing infrastructure and amenities. As a result, this report focuses on greenfield development and has removed brownfield development where possible.

However, while CPRE strongly campaigns for the use of brownfield land for housing developments, our analysis shows that the developments granted in AONBs on brownfield land do not use land efficiently. Between the financial years 2017/18 and 2019/20, there was 63% reduction in the average number of dwellings per hectare (Table 2). The reduction in density seen over this period as well as the lower approval rating than on greenfield AONB land, could suggest the unsuitability of AONB brownfield land for housing development, as well as a preference for greenfield development (Figure 1). Also, far fewer brownfield sites have come forward in the planning process since 2017. As the vast majority of land in AONBs is rural, and in districts with comparatively small populations, there is far less scope for a steady stream of urban redevelopment sites to come forward than in other areas.

**Table 2.** The number of housing units proposed on brownfield land in planning applications submitted and subsequently granted between the financial years 2017/18 up to August 2020, the total hectares of land granted permission and the average density per hectare of dwellings. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis

Financial year	Submitted	Granted	Granted Area (ha)	Proportion units Granted (%)	Average density (dph)
2017/18	1,255	1,114	22	89	51
2018/19	804	571	18	71	32
2019/20	772	444	23	58	19
2020/21*	396	285	16	72	18
<b>Total</b>	<b>3,227</b>	<b>2,414</b>	<b>79</b>	<b>-</b>	<b>-</b>
<b>Yearly average (to August 2020)</b>	<b>949</b>	<b>710</b>	<b>23</b>	<b>73</b>	<b>30</b>

\*Financial year data from April to August 2020.



**Figure 1.** The number of housing units proposed in planning applications which are submitted and subsequently granted on greenfield (a) and brownfield land (b) between the financial year 2017/18 to August 2020. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis

### 2.3 Which areas are seeing the most development threat?

Large-scale housing development is not uniformly distributed across the 34 English AONBs. Housing pressure within AONB areas – defined here by the number of yearly housing units being given planning permission – is most intense in the south east and south west, which have seen 85% of all housing units being granted in these regions between 2017/18 and August 2020 (Table 3 and Figure 2).

Further investigation in Table 1 shows that only four AONB areas - High Weald, Cotswolds, Dorset and Chilterns - have accounted for over half (52%) of all greenfield development in AONBs, with High Weald

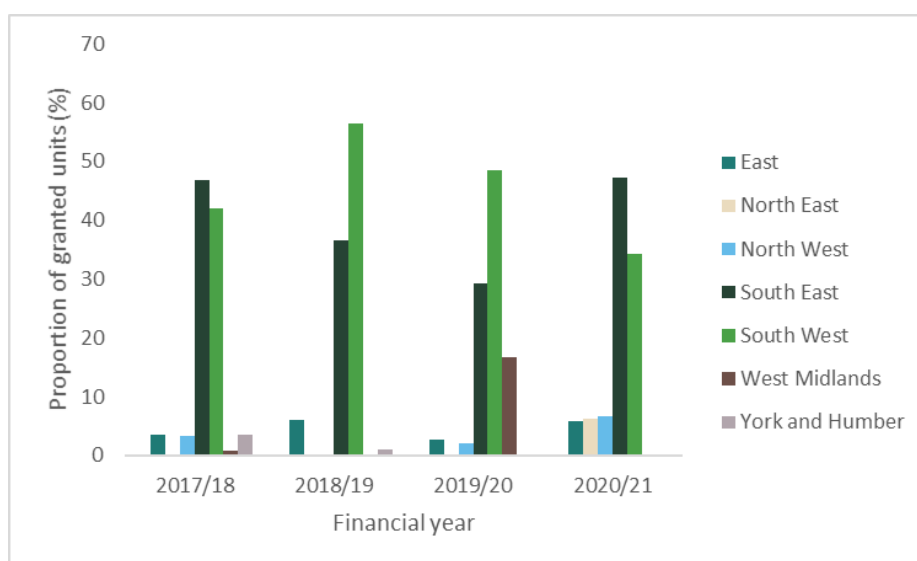
AONB seeing the highest development pressure of 16.4%, and pressure that has been sustained between 2017/18 and August 2020. However, many AONBs have seen increases in pressure over this time period (see Annex 2, Table A1).

The Cotswolds AONB for example, has experienced a 230% increase in housing units being built between 2017/18 and 2019/20 and the Kent Downs experienced a tenfold (1,094%) increase in the same period. While mostly concentrated within the south east and south west, there are examples of this trend outside of these areas with the Wye Valley also seeing a 20-fold (2,166%) increase in development pressure between 2017/18 and 2019/20 (Annex 2, Table A1).

**Table 3.** The number of housing units granted planning permission on greenfield land in each region of England between financial year 2017/18 to August 2020. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis.

Financial year	East	East Midlands	North east	North west	South east	South west	West Midlands	York and Humber
2017/18	65	-	-	63	875	782	15	66
2018/19	75	-	-	-	448	692	-	13
2019/20	49	-	-	37	544	901	325	-
2020/21*	43	-	45	48	345	250	-	-
<b>Total</b>	<b>232</b>	<b>-</b>	<b>45</b>	<b>148</b>	<b>2,212</b>	<b>2,625</b>	<b>340</b>	<b>79</b>
<b>Yearly average (to August 2020)</b>	<b>68</b>	<b>-</b>	<b>13</b>	<b>44</b>	<b>651</b>	<b>772</b>	<b>100</b>	<b>23</b>

\*Financial year data from April to August 2020.



**Figure 2.** The total proportion of housing units given planning permission on greenfield land in each region of England between financial year 2017/18 to August 2020. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis.



### Case Study – High Weald AONB

A 600-dwelling allocation at Pease Pottage in the High Weald was highly contested by local communities but was approved by Mid-Sussex District Council on the grounds that it would help meet the housing targets in the area, despite arguments that the development did not meet local need. This is a concerning precedent, and suggests that the meeting of housing targets is of higher precedent than the protection of the AONB or needs of the local community. There is evidence that this attitude to development in AONBs is beginning to be shown by other local authorities in the area. Wealden District Council has stated its intention to allocate housing in the AONB in their new local plan stating ‘where we are unable to meet our housing growth targets outside the AONB, we may need to consider meeting our growth requirements within the AONB’.<sup>4</sup>

## 2.4 How much of this housing is affordable?

### The definition of ‘affordable homes’

This report refers to the number of homes defined as affordable under national planning policy at the time. This includes social, affordable and intermediate housing to rent or buy, with the government’s assumption that 80% of market rate is affordable.

As AONBs are special environments, we should expect that any development within them should be truly exceptional. As well as meeting the highest environmental standards and complementing the landscape, they should also deliver affordable homes, which meet the needs of local communities.

In many protected landscapes, use is made of ‘rural exception sites’ – small sites of often fewer than 10 homes, not allocated for development in a local plan. Given their size, most rural exception sites will have fallen outside the parameters of this study. However, overall national figures up to 2018 suggested that across England, approximately 1,300 houses are built on rural exception sites every year on average. Most of these will be on land outside AONBs, although Cornwall (27% of which is an AONB) sees a particularly high concentration of rural exception site development, with as much as a quarter (or approximately 300 units per year) of all national exception site completions.<sup>5</sup>

Most of the new build that takes place in AONBs is therefore likely to be housing for the open market. Our analysis shows that large-scale AONB developments are providing executive housing, and not homes that are affordable for the people who need them. Of the 5,681 homes that have been built since 2017/18 up to August 2020, only 908 (16%) have been considered affordable by the national planning policy definition. This is far below the required 37% national average stated in local plans. This suggests that the pursuit of

<sup>4</sup> Wealdon District Council (2020), ‘Wealden Local Plan Direction of Travel Consultation’:  
<https://www.wealden.gov.uk/UploadedFiles/Wealden-Local-Plan-Direction-of-Travel-1.pdf>. Accessed 09/04/21

<sup>5</sup> Shelter (2018), ‘Exception sites are a lifeline for communities in need of affordable homes’:  
<https://blog.shelter.org.uk/2018/04/exception-sites/>. Accessed 12/04/21



unobtainable housing targets has resulted in local authorities granting inappropriate developments in these sensitive locations which, for the most part, do not actually meet genuine local need (Table 4).

**Table 4.** The number of housing units and the proportion of units that were classified as affordable built on greenfield AONB land between financial year 2017/18 up to August 2020. Data obtained from development projects over 10 units. Data source: Glenigan / CPRE analysis

Financial year	All units	Affordable units	Proportion Affordable (%)
2017/18	1866	307	16
2018/19	1228	150	12
2019/20	1856	331	18
2020/21*	731	120	16
<b>Total</b>	<b>5,681</b>	<b>908</b>	<b>-</b>
<b>Yearly average (to August 2020)</b>	<b>1,670</b>	<b>267</b>	<b>16</b>

\*Financial year data from April to August 2020.

### 3. AONB development in local plans

Local plans are created by local authorities, with opportunity for community input to set the vision for development in a local area. Councils are encouraged to review local plans every five years and, within them, are required to set an annual housebuilding target for the 15-year plan period and show that they have enough land to meet their housing targets for at least the next five years.

While great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, the requirement for local authorities to show that they have enough land in their local plan for this five-year target often results in local authorities having to allocate land within AONB areas for housing developments. When a council cannot demonstrate a ‘five-year land supply’ for housing, or doesn’t have a local plan in place, the NPPF’s presumption in favour of ‘sustainable development’ in effect encourages developers to submit speculative housing applications – even in AONBs, where the presumption does not apply. The situation is made worse by a system for determining housing numbers that creates unnecessarily high targets. This result is seen most strongly in the south of England due to market forces resulting in higher housing targets than those in other regions (see section 2.4).<sup>6</sup>

In principle, ‘major development’ on AONB land should only happen under exceptional circumstances, and only when it can be demonstrated that it is in the public’s interests. However, from the results presented in this and previous reports,<sup>2</sup> it appears that local authorities continue to plan major developments, often to

<sup>6</sup> Lichfields (2020), ‘How many homes? The new Standard Method’: <https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/>. Accessed 13/04/21

the dismay of the local communities (see High Weald case study) in AONBs, raising the question of whether AONBs are sufficiently protected in planning policy.

### 3.1 How much housing is planned for in current and future local plans?

For this analysis, we examined local plans that had reached a late stage of the plan-making process for major developments on AONBs (pre-submission publication under Regulation 19 or later – for more details, please see Annex 1). We excluded proposals in local plans that had not reached that stage as well as proposals below 100 units.

We found that there are currently 6,490 housing units (equal to 430 houses per year for 15 years) planned for AONB land across nine local authorities' local plans (Table 5). In addition, the pressure from these projects is highly concentrated, with all these local authorities being in the south east or south west, and the High Weald, Kent Downs and Dorset AONBs sharing the majority of this pressure. A total of 5,510 units are designated for these areas alone. This is also likely to be a significant underestimation of the number of houses planned for AONBs as this analysis only considered projects of over 100 units. It is therefore the case that there will continue to be a steady rate of building, mostly of market housing, in AONBs, for the foreseeable future.

**Table 5. The number of housing units proposed on AONB land in local planning documents. Data obtained from projects of over 100 units. Data source: National Association for Areas of Outstanding Natural Beauty (NAAONB) research March 2021**

Status of local plan	Number of housing units (yearly delivery over 15 years)
Adopted plans	3,300 (or 245 houses per year)
Emerging plans*	3,190 (or 212 houses per year)
<b>Total</b>	<b>6,490 (or 432 houses per year)</b>

\* This includes plans that are pre-submission publication, have been submitted and have been found sound by the planning inspectorate.

### 3.2 Development in the setting of AONBs

AONBs are also impacted by development immediately outside their boundary in the area (up to 500m outside the boundary) known as the 'setting'. Housing development in these areas can have a significant impact on the character of the AONB. Decisions to build within the setting of AONBs can change the way in which they are experienced, affecting the ability of local communities and visitors to appreciate the area.

Our analysis in Table 6 shows that between 2017/18 and October 2020, there has been 27,857 housing units granted within the setting of AONBs. This is in comparison to the previously reported 11,879 units granted in the five years up to 2017, an increase of 135%. The number of applications for development projects in the

setting has more than tripled since 2012, which saw 45 applications in 2012/13 rise to 166 in 2017/18 and 2019/20, with on average, half of applications being for greenfield land. The area being granted has also increased greatly from 12ha since 2012/13 to an average of 244ha per year between 2017/18 and 2020/21, 54% of which was on greenfield land. However, the density of housing developments has increased since last reported from an average of below 20dph to 29dph, but this still remains below the national average of 31dph.<sup>2</sup>

The Government appears to recognise development within the setting of AONBs is a growing issue. The draft new National Planning Policy Framework, published in January 2021, states (at paragraph 175) that ‘any development within their (AONBs and National Parks) settings should be sensitively located and designed to avoid adverse impacts on the designated landscapes.’ Based on the evidence we present here, CPRE believes that a stronger approach to setting will be needed than that proposed. In particular we believe that developments within the setting should only take place if it can clearly be shown that there will be no adverse impacts on the neighbouring AONB.

**Table 6.** The number of projects submitted, the subsequent number of housing units and hectares granted and the resulting average dwellings per hectare on land within the setting of AONBs between financial years 2017/18 up to October 2020. Data obtained from projects over 10 units. Data source: Glenigan / CPRE analysis

Financial year	Projects Submitted / (greenfield)	Units Granted / (greenfield)	Granted Area (ha) / (greenfield)	Average density (dph)
2017/18	166 (72)	7,157 (3,601)	203 (128)	35
2018/19	163 (66)	7,550 (3,514)	313 (111)	24
2019/20	166 (87)	10,068 (6,390)	294 (200)	34
2020/21*	78 (37)	3,082 (1,420)	116 (66)	27
<b>Total</b>	<b>573 (262)</b>	<b>27,857 (14,925)</b>	<b>926 (504)</b>	-
<b>Yearly average (to October 2020)</b>	<b>151</b>	<b>7,330</b>	<b>244</b>	<b>29</b>

\*Financial year data from April to October 2020.

In adopted and emerging local plans, we have identified site allocations for 34,000 homes within the setting of AONBs. Regulation 19 or submitted plans reveal that the pressure on the setting of AONBs is likely to increase. This result points towards the great pressure that local authorities with AONB within their locality have in meeting their land supply targets, while avoiding site allocations in AONB land (Table 7).

**Table 7.** The number of housing units proposed to be built within the setting of AONBs. Data obtained from projects of over 100 units. Data source: National Association for Areas of Outstanding Natural Beauty (NAAONB) research March 2021

Status of local plan	Number of housing units
Adopted plans	6,595
Emerging plans*	27,810
<b>Total</b>	<b>34,405</b>

\*This included plans that are pre-submission publication and those that have been submitted.

### Case Study – Chichester Harbour

Chichester Harbour is an Area of Outstanding Natural Beauty, as well as a Site of Scientific Special Interest (SSSI) and provides an important wetland habitat for migratory birds. Like many southern local authorities, Chichester District Council is faced with the pressure of finding land to accommodate a high housing target, despite much of the land in the area being constrained for development by the South Downs National Park and the Chichester Harbour AONB. Leaving little land remaining for site allocations. Further, a delay to the district’s local plan is making the area vulnerable to ad hoc, speculative development proposals in the setting of the AONB boundary. The quality of Chichester Harbour has suffered as a result with Natural England describing the AONB as in ‘unfavourable and declining’ condition, because of increasing development and rising sea levels.

### 3.3 Cumulative impact

While our analysis here only focused on developments over 100 houses, there are smaller developments in current and late stage local plans which have a cumulative impact over the locality. For example, the Sevenoaks emerging local plan outlines site allocations for a total of 3,149 housing units in the Kent Downs AONB. This is half of the total district’s housing allocations, with a further 3,265 proposed for outside the AONB.

While many of the issues in terms of AONB protection are failings of national policy, particularly in relation to housing targets, the development of local development policies can cause further complications. The Purbeck partial review, for example, which covers 50% of the Dorset AONB contains a policy which allows for new sites of up to 30 units to be joined to existing settlements. As the policy currently stands, these dwelling extensions could be added uniformly to existing settlements from towns through to villages, with no consideration given to their current size. Cumulative impacts from this policy could result in further negative impacts on the AONB.



#### 4. Conclusions and recommendations

The case is clear: our Areas of Outstanding Natural Beauty are facing needless and increasing pressure from housing developments. This pressure is being seen predominantly in the south east and south west of England where local authorities struggle to balance to meet the required housing targets imposed on them by central government, and the protection of AONBs under their care. However, it is evident from this report that reaching numerical housing targets is prioritised over protecting these precious landscapes.

Developers are also applying sustained pressure on local authorities through an increasing number of planning applications being submitted on greenfield AONB land and local authorities continue to grant a high proportion of these applications in pursuit of housing numbers. However, the developments are land hungry, and are not helpful in reducing the impact of the affordable housing crisis. These results are a far cry from the 'highest planning protections' that AONBs are meant to enjoy

To ensure better protection of these special landscapes, we recommend:

- A new requirement for the government and local planning authorities to maintain and publish annual information on the **number of housing units that are permitted or refused in AONBs, and the amount of land developed for housing.**
- **Prioritising small scale affordable and social homes for local people**, held by the community in perpetuity, on sustainable AONB sites.
- The public interest in **conserving and enhancing AONBs should be prioritised** over meeting and delivering on local plan housing targets.
- **AONB partnerships should be treated as statutory consultees** on major developments within or in the setting of AONBs, with a requirement for local authorities to give weight to their advice.
- The **NPPF should be strengthened** to prevent high levels of development in the setting of AONBs, all of which should be of a sensitive scale, location and design and only be permitted if it results in no adverse impacts on the AONB.

## Annex 1: Method

This report investigated the threat to AONBs through two methods:

1. The allocation of sites within AONBs under 'exceptional circumstances' through the local plan process.
2. The number of planning applications submitted by developers and approved by local planning authorities for housing developments on AONB land.

Details on the data sources used:

- **Planning application data:** a dataset and report detailing the planning applications for over 10 units was provided by Glenigan, a construction industry research consultancy. Further details of their approach are within their reports. Additional analysis of planning application documentation provided the affordable homes figures for each application.
- **Local plans:** The data includes proposals over 100 units identified in plans that have reached a late stage in their development, from 'pre-submission' (regulation 19) publication to adopted plans.
- **Government publications:** are used and referenced where relevant, in particular the Land Use Change Statistics.



## Annex 2: Tables and figures

**Table A1.** The number of housing units granted on greenfield land in AONBs since 2017/18 and August 2020 by AONB. Only AONBs which has this type of development included. Data obtained from projects over 10 dwellings. Data source: Glenigan / CPRE analysis

AONB <sup>Region</sup>	Units granted				Total	(%)
	2017/18	2018/19	2019/20	2020/21		
Arnside & Silverdale <sup>N.west</sup>	-	-	21	-	21	0.4
Chilterns <sup>S.east</sup>	360	71	161	-	592	10.4
Cornwall <sup>S.west</sup>	78	44	59	99	280	4.9
Cotswolds <sup>S.east/ S.west</sup>	126	232	290	36	684	12.0
Cranborne Chase & West Wiltshire Downs <sup>S.west</sup>	-	10	170	-	180	3.2
Dorset <sup>S.west</sup>	509	205	38	19	771	13.6
Forest Of Bowland <sup>N.west</sup>	63	-	16	48	127	2.2
High Weald <sup>S.east</sup>	293	304	41	294	932	16.4
Isle Of Wight <sup>S.east</sup>	51	-	-	-	51	0.9
Kent Downs <sup>S.east</sup>	16	-	175	10	201	3.5
Mendip Hills <sup>S.west</sup>	-	10	300	-	310	5.5
Nidderdale <sup>York.Humber</sup>	66	13	-	-	79	1.4
Norfolk Coast <sup>East</sup>	12	28	12	18	70	1.2
North Devon <sup>S.west</sup>	44	-	-	-	44	0.8
North Wessex Downs <sup>S.east/ S.west</sup>	156	105	185	102	548	9.6
Northumberland Coast <sup>N.east</sup>	-	-	-	45	45	0.8
South Devon <sup>S.west</sup>	24	112	26	13	175	3.1
Suffolk Coast & Heaths <sup>East</sup>	53	37	37	25	152	2.7
Surrey Hills <sup>S.east</sup>	-	57	-	-	57	1.0
Tamar Valley <sup>S.west</sup>	-	-	-	22	22	0.9
Wye Valley <sup>W.midlands</sup>	15	-	325	-	340	6.0
<b>Total</b>	<b>1,866</b>	<b>1,228</b>	<b>1,856</b>	<b>731</b>	<b>5,681</b>	<b>100</b>



**Table A2.** The number of housing units granted on greenfield and brownfield land in AONBs since 2017/18 and August 2020 by AONB. Only AONBs which has this type of development included. Data obtained from projects over 10 dwellings. Data source: Glenigan / CPRE analysis

AONB <sup>Region</sup>	Units granted				Total	(%)
	2017/18	2018/19	2019/20	2020/21		
Arnside & Silverdale <sup>N.west</sup>	-	-	21	-	21	0.3
Blackdown Hills <sup>S.west</sup>	22	-	-	-	22	0.3
Chichester Harbour <sup>S.east</sup>	-	10	-	-	10	0.1
Chilterns <sup>S.east</sup>	411	126	171	34	742	9.2
Cornwall <sup>S.west</sup>	109	77	59	128	373	4.6
Cotswolds <sup>S.east/ S.west</sup>	560	367	383	72	1382	17.1
Cranborne Chase & West Wiltshire Downs <sup>S.west</sup>	-	20	170	-	190	2.4
Dorset <sup>S.west</sup>	580	268	52	61	961	11.9
East Devon <sup>S.west</sup>	-	50	-	-	50	0.6
Forest Of Bowland <sup>N.west</sup>	80	30	16	48	174	2.2
High Weald <sup>S.east</sup>	442	304	138	328	1212	15
Isle Of Wight <sup>S.east</sup>	51	12	-	-	63	0.8
Kent Downs <sup>S.east</sup>	16	14	233	33	296	3.7
Malvern Hills <sup>W.midlands</sup>	-	28	-	-	28	0.3
Mendip Hills <sup>S.west</sup>	-	10	300	-	310	3.8
Nidderdale <sup>York.Humber</sup>	66	13	-	-	79	1
Norfolk Coast <sup>East</sup>	12	28	12	18	70	0.9
North Devon <sup>S.west</sup>	60	-	-	-	60	0.7
North Wessex Downs <sup>S.east/ S.west</sup>	323	136	310	112	881	10.9
Northumberland Coast <sup>N.east</sup>	30	-	-	45	75	0.9
Shropshire Hills <sup>W.midlands</sup>	52	-	-	-	52	0.6
Solway Coast <sup>N.west</sup>	15	-	-	-	15	0.2





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South Devon <sup>S.west</sup>	52	126	41	36	255	3.2
Suffolk Coast & Heaths <sup>East</sup>	84	37	37	69	227	2.8
Surrey Hills <sup>S.east</sup>	-	110	-	-	110	1.4
Tamar Valley <sup>S.west</sup>	-	33	-	22	55	0.7
Wye Valley <sup>W.midlands</sup>	15	-	342	10	367	4.5
<b>Total</b>	<b>2,980</b>	<b>1,799</b>	<b>2,285</b>	<b>1,016</b>	<b>8,080</b>	<b>100</b>