

Affordable Housing Rural Exceptions Sites: Technical Advice Note Sequential Test

Policy Background:

Rural exception sites are small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding. (NPPF Feb 2019, Annex 2: Glossary)

In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this (NPPF Feb 2019, para.77)

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.... (NPPF Feb 2019, Para 78)

Planning policies and decisions should avoid the development of isolated homes in the countryside... (NPPF Feb 2019, Para 79)

The intention of Adopted TDBC Core Strategy (CS) Policies SP4 and DM2 is to support the direction in the NPPF by allowing for the exceptional release of land adjoining or well-related to existing settlements where there is an identified local need for affordable housing for that particular settlement (CS Policy DM2: criterion 6). The policy clarifies that the site should be

a) *adjoining settlement limits, provided no suitable site is available in the rural centre;*

b) *in other locations well related to existing facilities and to meet an identified local need that cannot be met in the nearest identified rural centre.*

The Inspector for a recent Appeal Decision APP/W3330/W/20/3246143 confirmed that: *Policy DM2 sets out that proposals will remain targeted to locations within rural centres. This corresponds with CS Policy SP1 and SP4, which indicate that growth in rural areas will be more limited while allowing for sites fulfilling affordable housing exceptions criteria outside development boundaries in the Major Rural or Minor Rural Centres...*

The adopted TDBC Affordable Housing SPD section 1.10 provides additional clarification that:

- The Council will expect developments to be small scale.
- Local housing needs will need to be demonstrated via an up-to-date Parish survey – paid for by the applicant.
- Should consider all available sites around a settlement in order to identify the most suitable site. The development should be of an appropriate size as not to have an overbearing impact on the settlement or the countryside as well as being sympathetic to the form and character of the village.
- Arrangements will be secured to ensure that initial and subsequent occupancy of the dwellings is restricted first to those having an identified local need for affordable housing through the use of appropriate safeguards, including planning conditions or Section 106 obligations.
- In the event that a small proportion of cross subsidy through open market housing is required, this will need to be discussed with the Council prior to submitting a planning application. A detailed statement, including viability information independently verified at the applicants cost by the Council's preferred independent assessor should be submitted with the planning application.

The intention of Adopted West Somerset Local Plan to 2032 (LP) Policies OC1 and SC4(5) is to support the direction in the NPPF by allowing affordable housing where there is a demonstrated local need in order to maintain the balance and health of the local community. Policy OC1 clarifies that affordable housing exceptions schemes should be *adjacent to, or in close proximity to, a settlement in the open countryside*. Policy SC4(5) notes that *a proportion of market housing may be appropriate in order to enable the development to take place* in locations not identified as sustainable settlement by policy SC1 and that *in such cases the open market element will be restricted*.

The Inspector for a recent Appeal Decision APP/W3330/W/20/3246143 confirmed that: *Policy DM2 sets out that proposals will remain targeted to locations within rural centres.*

A principal aim of the adopted planning policy is to direct development towards the most sustainable locations, where there is a range of easily accessible services and facilities to support the population. However, there are circumstances in which it is appropriate to allow affordable housing exception development where it is beneficial to the health of the community and/or the local economy. By setting out A Sequential Tests for Rural Exceptions sites officers believe this is both is good practice and will to ensure that the most appropriate location for that development is identified.

Information accompanying an Affordable Housing Exceptions Site planning application.

With regard to the policy context the Council therefore requires applicants for sites not at sustainable settlements defined by SP1, SP4 and SC1 in local planning policy to provide evidence to demonstrate that need could not (or should not) be accommodated in the nearest sustainable settlement and that the site in the proposed area is the most sustainable location available.

The sustainable settlements are: Taunton, Minehead, Wellington, Watchet, Williton, Wiveliscombe, Creech St Michael, Cotford St Luke, Churchinford, Milverton, North Curry, Bicknoller, Carhampton, Crowcombe, Kilve, Stogumber, Stogursey, West Quantoxhead, Washford, Holford, Dunster Marsh, Brompton Ralph, Battleton and, Brushford.

The affordable housing needs survey may be able to provide evidence that the need is specific to a particular Parish and not feasible for persons to relocate to the nearest sustainable settlement due to personal circumstances and accessibility issues.

An identification and assessment of known and potential development sites in and adjacent to the immediate village to which the exceptions application relates, and also those in the nearest sustainable settlement as defined by CS Policy SP1 or LP Policy SC1 will need to be undertaken. A high-level availability, delivery and sustainability appraisal of these sites will be expected.

Affordable Housing Needs Survey

Evidence of affordable housing need in the application village/town and whether those in need could relocate to the nearest sustainable settlement can be ascertained through the Affordable Housing Needs Survey (or Local Housing Needs Assessment

with Survey). This assessment is a bespoke survey for a Parish area containing standard questions (such as: household composition, incomes and savings and local connection) and also specific questions tailored to the Parish's circumstances.

As part of the AHNS/LHNS the Council recommends that specific questions are asked to understand if those in housing need would be able or willing to locate to the nearest sustainable settlements, as defined by CS SP1 or LP SC1. For example: based on their ability to travel and available public transport, their local support network, the location of employment, health needs, and education and learning needs. For example if the location for an exceptions site was Hatch Beauchamp the nearest sustainable settlement is North Curry therefore questions could include:

If you are in housing need would you want to live in North Curry which is the nearest minor centre to Hatch Beauchamp?

Yes /No/ Would consider (please give details if possible)

If there was affordable housing in North Curry would this increase or decrease your reliance on travel by car.

Yes /No/Possibly (please give details if possible)

Would living in North Curry impact on access to the following:

- *health (GP, Dentist, Pharmacy, etc.)*
- *education (Primary, Secondary, Further education or learning)*
- *employment, or*
- *support networks for yourself and your family?*

Yes /No/Possibly (please give details, if possible, on whether this is a positive or negative impact)

Do you or any of your family belong to any groups or clubs in:

Hatch Beauchamp/North Curry/Elsewhere – please list organisations/clubs and their location

Do you attend a religious facility (i.e. church, chapel, temple, mosque, meeting house, etc.) in:

Hatch Beauchamp/North Curry/Elsewhere – please specify building and its location

Do you have other family members or support network living in:

Hatch Beauchamp/North Curry/Elsewhere – please list location and relationship

Stage 1 - Evidence on known and potential development sites within the nearest rural centre.

An identification and assessment of known and potential development sites in and adjacent to the nearest sustainable settlement, as defined by CS Policy SP1 or LP Policy SC1, will need to be undertaken. A high-level availability, delivery and sustainability appraisal of these sites will be expected. It is expected that applicants will include the following sites:

- Allocated sites in the Development Plan Documents
- Sites promoted through the Call for Sites and listed in the SHLAA
- Sites commercially available
- Any other known development opportunities in the locality.

Evidence to be provided includes:

- Availability: is the land available and in what time frame?
- Deliverability: any significant constraints, such as:
 - When the sites are likely to come forward.
 - Current land use
 - Physical issues with potential sites (e.g. floodzone 3b; ecology (SSSI, SAC, SPA, RAMSAR, Wetlands, HRA mitigation – i.e. bat mitigation), topography (e.g. challenging gradient), significant matters.
- Suitability:

- Matter influencing developability of the site (noting any potential issues e.g. contamination (previous land use, historic landfill, etc.), protected landscape (AONB, National Park), heritage (Scheduled Monuments, Listed Buildings, Registered Parks & Garden, etc.). If the site was subject to previous planning application this may highlight any significant issues.
- Based on the information from the survey are there any reasons why affordable housing should be located at the Parish/village exception site rather than in the nearest sustainable settlement?
- Compare services and facilities at Rural Exceptions site with those in the nearest sustainable settlement, are the public transport links and acceptable distances to the higher order settlements (SADMP A5: Accessible Development – maximum travel distances).
- Walk round of the sites with members of the parish council, other community members (where there is a designated group such as a community land trust, community housing group or similar) and a planner to gain a local representation.

An example of a tabulated form for this assessment:

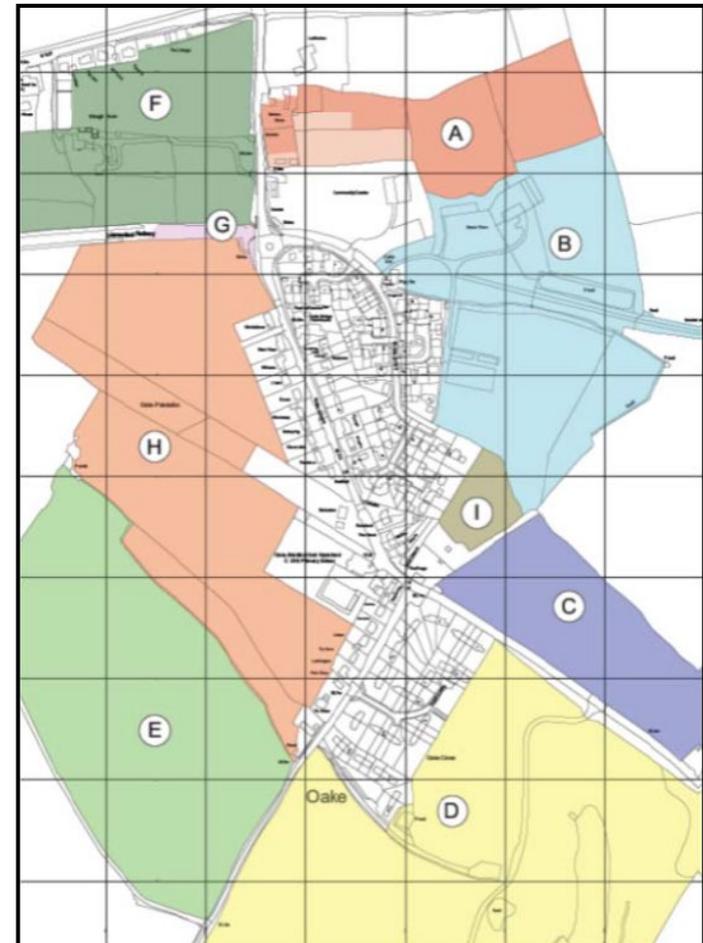
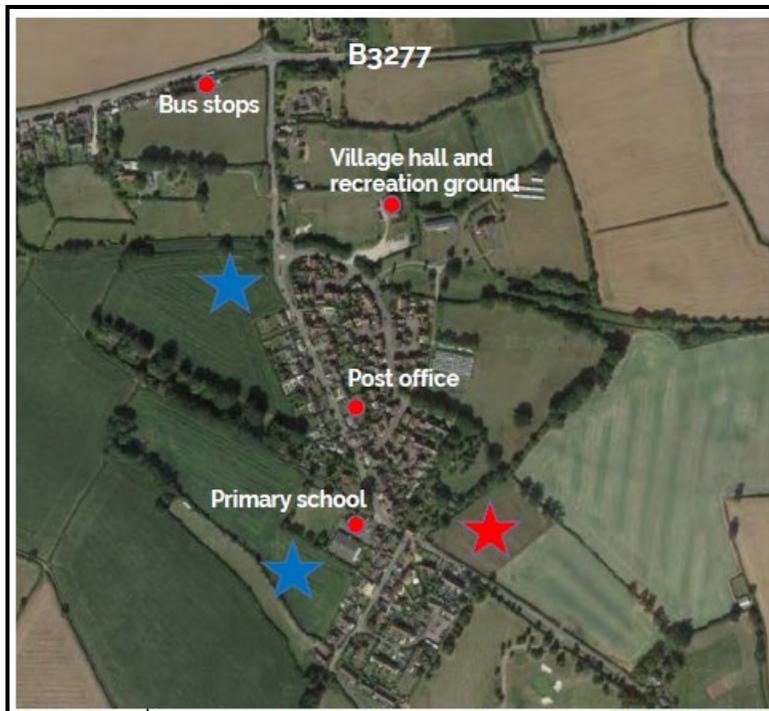
Site reference:	Availability	Deliverability	Suitability	RAG
SADMP allocation MIN7: Knapp Lane	No – in ownership of developer, has Planning Permission and being brought forward in line with policy SP1	N/A	N/A	R
SHLAA: MIN032	Yes – within 5 years, no options on land	Site is part of landscape/parkland setting of listed building; Within special landscape feature - North Curry Ridge; 50% of site within conservation area;	Site is part of landscape/parkland setting of listed building; Typical example of NLCA 143 - Mid Somerset Hills; Within special landscape feature - North Curry Ridge; Within a National Habitat Network Network Enhancement Zone 1; Close by are 4 x Priority Habitat Tradition Orchards; 50% of site within conservation area; Significant heritage	R

		<p>Significant heritage assets adjacent to site (Listed Buildings and Archaeology); SSSI & RAMSAR & SPA: Somerset Levels & Moors within 590m; no flooding issues.</p>	<p>assets adjacent to site; SSSI & RAMSAR & SPA: Somerset Levels & Moors within 590m; no flooding issues.</p> <p>Bus: nearest stop c.490m from centre of site; 5 services Taunton to Stoke St Gregory. Essential services and facilities in the village (shop and post office c.490m; GP/surgery 650m; primary, pre-school and Village Hall 850m; allotments c.370m; there is also a hairdressers and coffee shop, sports fields are 600m). Other services and facilities: Secondary School (Heathfield Community School 6.58km away at Monkton Heathfield). Digital: Broadband - Standard and Superfast available (60Mbps download, 13Mbps upload); Mobile network - No coverage for three providers and Some Problems with Three).</p>	
SHLAA: MIN073	Yes – within 5 years, no options on land	<p>Site is residential garden; SSSI & RAMSAR & SPA: Somerset Levels & Moors 850m; No flooding or heritage assets within or immediately adjacent to the site.</p>	<p>Site is residential garden; SSSI & RAMSAR & SPA: Somerset Levels & Moors 850m; Within a National Habitat Network Network Enhancement Zone 1; c.200m from Priority Habitat Tradition Orchards; No flooding or heritage assets within or immediately adjacent to the site.</p> <p>Footpath: adjacent to site, links into PRW which goes to village centre. Bus: nearest stop is c.400m from centre of site; 5 services Taunton to Stoke St Gregory. Essential services and facilities in the village (pub, convenience shop and post office c.230m, surgery 420m; primary, pre-school and</p>	Y

			<p>Village Hall 660m, there is also a hairdressers and coffee shop, sports fields are 700m. Other services and facilities: Secondary School (Heathfield Community School 6.58km away at Monkton Heathfield). Digital: Broadband - Standard and Superfast available (60Mbps download, 13Mbps upload); Mobile network - Good coverage Vodaphone; Some Problems for other three providers.</p> <p>Community Comments - XXXX</p>	
SHLAA: MIN056	Potentially – within 5-10 years	N/A	Site is not adjacent to the settlement limit, and is over 1km from bus stop, as well as essential services and facilities.	R
SHLAA: RURAL X	Yes – within 5 years,	Site is paddock; No flooding, heritage assets, protected landscape or significant ecology within or immediately adjacent to the site	<p>Site is adjacent to the settlement limit, Bus: nearest stop is c.50m and is an hourly service Taunton-Minehead; Village Hall, Community Shop and Church are within 450m and there is a travelling post office once a week in the village hall; Other services and facilities can be accessed by the hourly bus service.</p> <p>Community Comments - XXXX</p>	G
Commercial search for period of 01/06/2020-01/12/2020	N/A	N/A	No land offered for sale during that time that was adjacent to or within 50m of the integral built-up area of North Curry.	R
XXX	XXX	XXX	XXX	

Illustrative plan to accompany table:

An illustrative plan accompanying the assessments will be expected. It needs to show the location of the sites and it would be helpful to also show the locations of essential services and facilities.



Stage 2 - Sequential Test of Sites within the application village/Town

An identification and assessment of known and potential development sites in and adjacent to the immediate village to which the exceptions application relates. Show these locations on a map. Undertake a high-level availability, deliverability and sustainability appraisal of these sites will be expected.

A high-level assessment of each site settling out:

- Availability: is the land available and in what time frame.
- Deliverability: degree of cross subsidy required; adequate arrangements for provision of services; any significant constraints (using information from Suitability section, based on an SA process).
- Suitability based on a “off-policy” assessment and Sustainability Appraisal criteria:
 - Population, health and deprivation: Reduce inequalities and promote quality of life, health and well-being:
 - Is the site in an area in the lowest 20% of the Index of Multiple Deprivation?
 - Movement: will the site encourage walking/cycling?
 - Community infrastructure: how far to the nearest: opens space (general open space and children’s play area, playing field, allotment); GP; pharmacy; primary and secondary school; pre-school; convenience shop?
 - Digital accessibility: what is the mobile and broadband coverage?
 - Health and Safety: is it within the Consultation Zones for: HPC, HSE; are there high voltage power lines across the site; are there any areas nearby that would result in unacceptable noise (road, rail or industry)?
 - Air Quality: Is the site in or adjacent to an Air Quality Management Area?
 - Transport: minimise the need to travel by private car:
 - Movement: will the site encourage walking/cycling?
 - Transport: how far is the nearest bus stop and what is the frequency or service and key locations they goes to?
 - Transport: how far is the nearest train station and what is the frequency of services; or are there plans for new stations nearby?
 - Ecology and Biodiversity: Protect, conserve and enhance the district’s biodiversity, habitats and species:
 - How far is the nearest SAC/SPA/SSI/SPA/RANSAR, Wetlands?
 - Are there any recognised local designations (i.e. County/Local Wildlife Sites) nearby?

- Are there a priority habitats or protected species on or near the site?
 - Is the site within Bat and GCN consultation zone?
 - What ecological features exist on or near the site?
 - Flood Risk (pluvial and fluvial) and coastal change: what Flood Zone and/or CCMA is it in, and what are the actions associated with the Shoreline Management Plan for the area (if relevant)?
- Historic Environment/Heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance (including maritime and coastal heritage), and their settings:
 - Identify location, proximity and potential relevance of statutory historic features such as Listed Buildings, Conservation Areas and Scheduled Monuments.
 - Identify location, proximity and potential relevance of Registered Battlefields, Registered Parks and Gardens and local heritage records.
 - What kind of potential is there for significant archaeology: How far is the nearest Area of High Archaeological Importance and/or County Archaeological Site and what is its importance?
- Landscape: Protect and enhance the character and appearance of the landscape and townscape quality of the district, maintaining and strengthening its distinctiveness and its special qualities:
 - How far is the nearest protected landscape: AONB and/or National Park?
 - Would the site be within an area of local importance: Green Wedge, Special Landscape Feature, etc?
 - Would the site affect a sensitive ridgeline?
 - What is the National Landscape Character area and Local Character Type and Area?
- Soils & Contamination
 - What is the Agricultural Land Classification of the site?
 - Is it in an area of concern for ground/surface water nitrate, pesticide or phosphate issues?
 - Is there any historic landfill nearby?
 - Is there potential for contamination on site?
- Resources and Waste: minerals and waste: Minimise the development of greenfield sites, reduce soil contamination, ensure the provision of adequate minerals and promote the waste hierarchy:

- Is the site greenfield or brownfield?
- Is the site in or near a Minerals Safeguarding Area?
- Is the site within an area classified as a Drinking Water Safeguarding Zone?
- Water: Protect and enhance water quality, and minimise water use, reduce flooding:
 - How far is the nearest water body?
 - Is the site in a Source Protection Zone?
 - Is the site in Flood Zone 3a, 3b or 2?
- Utilities & Services
 - Could all utilities be easily run to the site?
 - Are there any high voltage power cables or high pressure gas mains running across the site?
- Relationship to other sites

The information requested

The level of information requested can be obtained from Gov open-source data such as [Magic](#), [NBN Atlas](#), [NCER Mapping](#), [SqZs/NVZ's](#), [SHER](#), [OfCom](#), [SCC-Schools](#), [SWT Planning Applications](#), [SWT Planning Policy](#).

Queries

If you have any questions or queries about this technical note please contact Housing Enabling housingenabling@somersetwestandtaunton.gov.uk or Planning Policy strategy@somersetwestandtaunton.gov.uk

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