

**SOUTH WARWICKSHIRE LOCAL PLAN 'ISSUES AND OPTIONS'
CONSULTATION - RESPONSE FROM THE COTSWOLDS NATIONAL
LANDSCAPE BOARD¹, 6 MARCH 2023**



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CHAPTER 3. VISION AND STRATEGIC OBJECTIVES

Q-V3.1 Do you agree that the Vision and Objectives are appropriate?

No.

Q-V3.2. If no, please indicate why.

Vision

The opening statement of the Vision is *'to meet South Warwickshire's sustainable development needs, while responding to the climate emergency'*. We are pleased to see reference being made to 'sustainable development' at the start of the Vision, as this ties in well with the purpose of the planning system, which is *'to contribute to the achievement of sustainable development'*².

However, the phrase *'to meet South Warwickshire's sustainable development needs'* inappropriately skews the emphasis towards 'development needs' rather than 'sustainable development'. This impression is reinforced by the Strategic Objectives, where the objective of *'meeting South Warwickshire's sustainable development needs'* only focusses on delivering vibrant town centres, infrastructure, jobs and homes. It is further reinforced by the emphasis given to infrastructure, jobs and homes in the third paragraph of the Vision.

¹ Cotswolds National Landscape Board is the name that is now used for the Cotswolds Conservation Board, although the latter remains the formal / legal name of the organisation.

² Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* ([link](#)). Paragraph 7.

Development is only sustainable if it meets economic, social and environmental objectives in mutually supportive ways.³ It is not appropriate to emphasise one or two of these objectives over another.

We acknowledge that the opening statement of the Vision states '*... while responding to the climate emergency*'. Responding to the climate emergency is obviously a key consideration. However, this should not be the only environmental objective that is addressed at the start of the vision. Also, the use of the word 'while' creates the impression that responding to the climate emergency is a secondary and separate objective, albeit that will be addressed concurrently with meeting sustainable development needs. The vision should make it much clearer that development needs should be met in a way that actively addresses the climate emergency.

Alongside the 'climate emergency', explicit reference should also be made to the 'ecological emergency' (i.e., the drastic decline in biodiversity at an international, national and local level). With regards to the ecological emergency, we recommend that the principle of having '*a biodiverse and environmentally resilient South Warwickshire*' should explicitly seek to achieve a significant increase in biodiversity.

We also have concerns about the emphasis given, in the Vision, to accommodating unmet needs from neighbouring authorities. Whilst this is an important consideration for identifying the amount of housing and development that should be planned for (and the spatial strategy for delivering this), it does not seem appropriate to put this issue 'front-and-centre' in the over-arching Vision for the area. We suggest that this sentence should be deleted.

Strategic Objectives

All of the strategic objectives should contribute to sustainable development. This should be made clear in the opening / supporting text for the strategic objectives.

In this context, and having regard to our comments on the Vision, the first strategic objective should be '*Meeting South Warwickshire's Development Needs*' rather than '*Meeting South Warwickshire's Sustainable Development Needs*'.

The section of the strategic objective '*A resilient and Net Zero Carbon South Warwickshire*' should address the resilience of the whole South Warwickshire area to climate change, not just the resilience of new development.

We consider that the strategic objective of '*A well-designed and beautiful South Warwickshire*' should make explicit reference to the Cotswolds National Landscape (CNL). Although the CNL only covers a small part of South Warwickshire, its setting covers a wide and development further afield has the potential to increase traffic movements through the CNL. The CNL is also an area whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it. This national importance should be reflected in the strategic objectives.

Recommendations (in relation to Q-V3.1 and Qv3.2)

Vision

Suggested wording:

³ NPPF. Paragraph 8 ([link](#)).

The vision is to achieve sustainable development in South Warwickshire by meeting the area's development needs in a way that actively addresses the climate and ecological emergencies and significantly enhances our natural and built environment.

The plan will provide homes and jobs, boost and diversify the local economy, and provide appropriate infrastructure, in suitable locations, at the right time. Five overarching principles will determine how this development is delivered:

- ***A climate resilient and Net Zero Carbon South Warwickshire*** – *adapting to the effects of climate change and mitigating against its causes, while avoiding any further damage that might arise from development*
- ***A well-designed and beautiful South Warwickshire*** – *creating spaces where people want to be, which respect and reflect the existing beauty and heritage of the area*
- ***A healthy, safe and inclusive South Warwickshire*** – *enabling everyone to enjoy safe and healthy lifestyles with a good quality of life*
- ***A well-connected South Warwickshire*** – *ensuring that development is physically and digitally connected, provided in accessible locations, and promotes active travel*
- ***A biodiverse and environmentally enhanced South Warwickshire*** – *strengthening green and blue infrastructure and achieving a significant net increase in biodiversity across South Warwickshire*

Strategic Objectives – Meeting South Warwickshire's Sustainable Development Needs

The title of this strategic objective should be changed to 'Meeting South Warwickshire's Development Needs', with the supporting – or introductory – text clarifying that all of the strategic objectives should contribute to achieving sustainable development.

Strategic Objectives - A resilient and Net Zero Carbon South Warwickshire

The wording of the bullet point should be changed to:

- *Ensuring that South Warwickshire is resilient to climate change, that new development does not cause a net increase in carbon emissions and that every opportunity is taken to reduce existing carbon emissions and mitigate against – and adapt to - climate harms.*

Strategic Objectives – A well-designed and beautiful South Warwickshire

This strategic objective should include an additional bullet point:

- *Conserving and enhancing the natural beauty of South Warwickshire's valued landscapes, particularly the Cotswolds National Landscape.*

Alternatively, to ensure consistency with other bullet points, the phrase 'protecting and enhancing' could be used.

CHAPTER 4. MEETING SOUTH WARWICKSHIRE'S SUSTAINABLE DEVELOPMENT NEEDS

Q-I1. Please add any comments you wish to make about the Sustainability Appraisal, indicating clearly which element of the appraisal you are commenting on.

No comment (at this stage).

Q-I2. Please select the option which is most appropriate for South Warwickshire

- **Option I2a: Set out infrastructure requirements for all scales, types and location of development**
- **Option I2b: Focus on the strategic infrastructure relating specifically to the growth strategy**

No comment.

Q-I3. Please select the option which is most appropriate for South Warwickshire

- **Option I3a: Establish a South Warwickshire CIL (or emerging new Infrastructure Levy) to support the delivery of the Plan**
- **Option I3b: Each District Council to produce its own Levy**

No comment.

Q-I4.1. Should we include a policy to safeguard specific infrastructure schemes within the SWLP?

Yes. This is important to enable the delivery of the proposed infrastructure improvements.

Q-I4.2. Please add any comments you wish to make about these specific safeguarding provisions

No comment.

Q-I5. Please add any comments you wish to make about infrastructure, viability and deliverability

No comment.

Q-S1. Please select the option which is most appropriate for South Warwickshire

- **Option S1a: Identify Strategic Green and Blue Corridors in advance of the Local Nature Recovery Strategy being produced**
- **Option S1b: Do not identify Green and Blue Corridors within the South Warwickshire Local Plan, and instead rely on the production of the Local Nature Recovery Strategy**

Option S1a.

It is vitally important that the South Warwickshire Local Plan addresses and facilitates nature recovery straight away rather than waiting until a Local Nature Recovery Strategy (LNRS) is adopted.

The Local Plan policy (and supporting text) should refer to the forthcoming LNRS and, ideally, should explicitly put measures in place to incorporate the LNRS into the Local Plan once the LNRS is adopted.

As indicated in the consultation documents, the existing Warwickshire, Coventry and Solihull Sub-regional Green Infrastructure Study can be used to inform the green / blue infrastructure policies.

Consideration should also be given to other relevant guidance and policy measures including:

- The Government’s aspiration to ensure that 30% of land is managed for nature by 2030.⁴
- The Government’s Environmental Improvement Plan 2023,⁵ including the targets to:
 - restore or create 500,000 hectares of wildlife rich habitat by 2042;
 - increase tree canopy and woodland cover from 15.4% to 16.5% of total land area in England by 2050.
- Natural England’s Green Infrastructure Framework;⁶
- South Warwickshire Climate Action Support,⁷ including the target to increase forest coverage by 24% by 2030.
- The Cotswolds Nature Recovery Plan.⁸

Q-S2. Please select all options which are appropriate for South Warwickshire

- **Option S2a: Identify areas considered particularly suited to intensification development, and develop a design code for each character area. Have a policy supporting intensification within these identified areas where it complies with the relevant design code.**
- **Option S2b: Have a policy with ‘in principle’ support for intensification development, applicable across South Warwickshire; and develop design codes**
- **Option S2c: Do not have a policy which encourages intensification**

Option S2a.

Intensification of development provides significant potential benefits. For example, it can help to increase the number of people who live within, say, a 10-minute walk, of key services, facilities, employment opportunities and public transport options.⁹ This, in turn, should help to reduce the need to travel by car and, in doing so, help to reduce greenhouse gas emissions.

However, the capacity of different settlements to accommodate intensification of development will depend on the character of the individual settlement. As such, it is important to develop design codes for each character area.

Intensification should not be delivered at the expense of green infrastructure, including biodiversity, or to the detriment of historic environment designations (and their settings) such as Conservation Areas, listed buildings and scheduled monuments.

If intensification is being considered within the Cotswolds National Landscape and its setting, this should not be to the detriment of the natural beauty of the National Landscape, including its special qualities, local distinctiveness and views from (and to) the National Landscape.

Q-S3.1. Please add any comments you wish to make about the Urban Capacity Study

Before brownfield land is classed as being ‘suitable’ for development,¹⁰ an ecological assessment should be undertaken to identify the ecological value of the site. In particular, consideration should be given to whether the site constitutes the priority habitat of ‘open mosaic habitat on previously

⁴ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>

⁵ HM Government (2023) *Environmental Improvement Plan 2023* ([link](#)).

⁶ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

⁷ Warwick and Stratford-on-Avon District Councils (2021) *South Warwickshire Climate Action Support* ([link](#)).

⁸ Cotswolds National Landscape Board (2022) *Cotswolds Nature Recovery Plan* ([link](#)).

⁹ This concept is commonly referred to as the ‘20-minute neighbourhood’ ([link](#)).

¹⁰ <https://cdn.buglife.org.uk/2020/01/Identifying-open-mosaic-habitat.pdf>

development land'. If this is the case, then the land should not be developed unless it can be demonstrated that the development would not harm this priority habitat.

Q-S3.2. Please select the option which is most appropriate for South Warwickshire

- **Option S3.2a: Prioritise brownfield development only when it corresponds with the identified growth strategy, or if it can be proven that the development is in a sustainable location or would increase the sustainability of the area.**
- **Option S3.2b: Prioritise development on brownfield land, incorporating existing buildings into development proposals wherever possible, irrespective of its location**
- **Option S3.2c: None of these**

Option S3.2a.

The need for development to be in a sustainable location is more important than the principle of prioritising development on brownfield land. This is because the sustainability of the location (i.e., proximity to services, facilities, employment and public transport) is a key component of mitigating the impacts of climate change. Developing brownfield land that is not in a sustainable location is likely to result in higher levels of greenhouse gas emissions (for example, through car use) than development in a sustainable location.

Q-S4.1. Do you think that growth of some of our existing settlements should be part of the overall strategy?

Yes.

This growth should be focussed on those settlements / neighbourhoods that are – or have the potential to become - '20-minute neighbourhoods', providing key services and facilities.

Q-S4.2. Please add any comments you wish to make about the settlement analysis, indicating clearly which element of the assessment and which settlement(s) you are commenting on

New Settlement Reference E1 (Long Marston Airfield / Meon Vale): We are pleased to see that the sustainability appraisal for this potential new settlement has had regard to the potential impacts on the Cotswolds National Landscape. We support the proposal to mitigate any potential minor adverse effects through the use of landscape-led site design principles. Consideration should be given to the potential cumulative effects of this new settlement combined with other development in this locality.

Q-S5.1. Please provide any comments you have on the emissions estimation modelling for the seven potential new settlement options

No comment.

Q-S5.2. Do you think new settlements should be part of the overall strategy?

Yes.

New settlements (away from protected landscapes) have the potential to play a key role in helping to secure '20-minute neighbourhoods' and, in doing so, help to reduce greenhouse gas emissions relating to commuting, for example.

Q-S5.3. In response to the climate change emergencies, we are looking at rail corridors as a preferred approach to identifying potential locations. Do you agree?

Don't know.

In principle, a 'rail corridor' growth option seems to be an appropriate preferred approach to identifying potential locations for new settlements as this should, in theory, help to reduce commuting-related greenhouse gas emissions.

However, the climate change emissions estimation for the potential new settlements indicates that the 'rail corridor' growth option doesn't perform any better than the 'economy' growth option or the 'sustainable travel' growth option and it performs worse than the 'sustainable travel and economy' option.

From the information provided in Table 2 of the emissions estimates report¹¹, it would seem that this is because the 'rail corridor' growth option doesn't perform as well in terms of delivering 20-minute neighbourhoods (although it is equal best in reducing car trips).

Overall, the 'sustainable travel and economy' growth option appears to deliver the most benefits out of the five growth options with regards to mitigating the impacts of climate change, including:

- The smallest quantity of greenhouse gas emissions.
- The equal best reduction in car trips.
- The equal best uptake of 20-minute neighbourhoods.
- Highest electric vehicle uptake.
- Higher retrofit and on-site renewables.

Rail corridors would presumably still form part of this 'sustainable travel and economy' growth option.

If Long Marston is prioritised through this process, consideration will need to be given to the potential impacts of development, including cumulative impacts, on views from (and to) the Cotswolds National Landscape, particularly with regards to views from public rights of way on Meon Hill.

Consideration would also need to be given to the extent to which the close proximity of a new transport hub, such as a new railway station at Meon Vale or Long Marston Airfield, might increase development pressures within the Cotswolds National Landscape and its setting. In this regard, we recommend that development at Meon Vale should *not*:

- Extend into the Cotswolds National Landscape.
- Extend east of the B4632.
- Coalesce with Lower Quinton.
- Extend south of the current southern limit of development at Meon Vale.

¹¹ Stratford-on-Avon District Council and Warwick District Council (2022) *South Warwickshire Local Plan – estimation of emissions for proposed growth options and new settlements*. Prepared by Arup. ([Link](#)).

Q-S5.4. If not, what approach would you take?

See response to question Q-S5.3.

Q-S7.1. Please provide any comments you have on the emissions estimation modelling for the five growth options

See response to Question Q -S5.3.

Q-S7.2. For each growth option, please indicate whether you feel it is an appropriate strategy for South Warwickshire:

- **Option 1: Rail Corridors:** Neutral
- **Option 2: Sustainable Travel:** Neutral
- **Option 3: Economy:** Neutral
- **Option 4: Sustainable Travel and Economy:** Appropriate strategy
- **Option 5: Dispersed:** Inappropriate strategy.

A key consideration in identifying the most appropriate growth option is the greenhouse gas emissions that will result from each option and the extent to which each option helps to mitigate and adapt to the impacts of climate change.

As outlined in response to Question Q-S5.3, the ‘sustainable travel and economy’ growth option appears to perform the best in this regard. Options 1-3 also provide some benefits, in this regard, as they locate development close to public transport or employment. Option 5 (Dispersed) clearly performs the worst in relation to greenhouse gas emissions.

It is more difficult to identify a clear preference based on the results of the Sustainability Appraisal¹², although Option 5 (Dispersed), again, clearly performs the worst in this regard.

The Sustainability Appraisal indicates that Option 5 (Dispersed) performs relatively well in relation to ‘Sustainability Appraisal Objective 4: Landscape’ on the basis of the overall scale of development being more thinly spread and distributed.

However, this does not take into account the fact that Option 5 would result in considerably more development within and adjacent to the Cotswolds National Landscape.¹³ For example, Options 1-5 don’t indicate any growth (over 50 dwellings) in settlements within the Cotswolds National Landscape, whereas Option 5 would result in:

- 150-350 dwellings in one National Landscape settlement (Ilmington);
- 50-150 dwellings in each of five National Landscape settlements;
- 150-350 dwellings in a settlement adjacent to the National Landscape (Quinton);
- 50-150 dwellings in each of two settlements adjacent to the National Landscape (Tysoe and Great Wolford).

This scale of development would not be appropriate in these relatively small settlements given that national planning policy states that the scale and extent of development in AONBs should be limited.

¹² A summary of the sustainability appraisal for the five growth options is provided in Table 7 of the Issues & Options consultation document ([link](#) – pages 59-60).

¹³ Option 5 is shown in Figure 20 of the Issues & Options consultation document ([link](#) – page 72).

This scale of development is also likely to harm the character, local distinctiveness and natural beauty of these settlements.

This should not be taken to mean that we think that there should be no development within the Cotswolds National Landscape. It just means that the relatively small settlements in (and directly adjacent to) this part of the Cotswolds National Landscape are unlikely to be suitable areas for accommodating 50+ dwellings. See our response to Question Q-S8.1, below, for further comments on this issue.

All five growth options identify that 5,000+ dwellings would be provided at Long Marston Airfield / Meon Vale. It would be useful if a more exact figure could be provided for each of the growth options as this would help with identifying the potential impacts of this development on the Cotswolds National Landscape. Further recommendations in relation to this development are provided in response to Question Q-S5.3.

Q-S8.1. For settlements falling outside the chosen growth strategy, do you think a threshold approach is appropriate, to allow more small-scale developments to come forward?

No, we do not think that a threshold approach is appropriate.

With regard to potential development within the Cotswolds National Landscape, we recognise that the Cotswolds is a living and working landscape and that maintaining thriving local communities is essential to the long-term future of the National Landscape. Providing housing that meets the needs of the local communities within the Cotswolds National Landscape plays an important role in achieving these aspirations.

However, these aspirations should be delivered in a way that is compatible with and, ideally, positively contributes to the statutory purpose of conserving and enhancing the natural beauty of the National Landscape.

Housing delivery within the National Landscape should also focus on meeting affordable housing needs, particularly with regards to housing that is affordable in perpetuity, such as social rented housing. Windfall housing proposals outside the settlement boundaries should be based on robust evidence of need arising within the National Landscape, for example, a housing needs survey for the specific settlement / parish.

Further guidance on this topic is provided in the Board's Housing Position Statement.¹⁴

In the current Stratford-on-Avon Core Strategy, the hamlet of Upper Quinton, which lies within the Cotswolds National Landscape, is included within the Local Service Village boundary for Lower Quinton, which lies outside of the National Landscape. We do not think that this is appropriate.

Government guidance states that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*'.¹⁵ In the context of Quinton, this means that Upper Quinton is unlikely to be a suitable area for accommodating the housing needs associated with Lower Quinton, which is a much larger settlement than Upper Quinton.

¹⁴ Cotswolds National Landscape Board (2021) *Housing Position Statement* ([link 1](#) – main document; [link 2](#) – appendices).

¹⁵ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

Q-S8.2. For sites coming forward as part of this threshold approach, what do you think would be an appropriate size limit for individual sites?

As indicated in response to Question Q-S8.2, we do not think that a threshold approach is appropriate.

However, it is worth noting that the issue of thresholds is relevant when considering whether a proposed development within the Cotswolds National Landscape constitutes ‘major development’, in the context of paragraph 177 of the National Planning Policy Framework (NPPF). The Board’s Landscape-led Development Position Statement¹⁶ provides a checklist of topics that should be taken into account when deciding if a proposal constitutes major development. One of the considerations in the checklist is whether a proposed housing development would increase the size of a settlement – or increase the number of dwellings in a settlement - by more than 5%. As such, if a proposed development would increase the number of dwellings by more than 5%, this makes it more likely that the proposal would constitute major development.

Question Q-S9. Please select the option which is most appropriate for South Warwickshire

- **Option S9a: Save all existing settlement boundaries where these are already defined within the Core Strategy, Local Plan, emerging SAP or an NDP.**
- **Option S9b: Within this Part 1 Plan, review which settlements have boundaries defined and which do not, as well as the extent of any such boundaries.**

Option S9a.

Option S9a would be most appropriate as this would enable the settlement boundaries to be finalised once any non-strategic allocations have been identified and taken forward.

Q-S10. Please add any comments you wish to make about the development distribution strategy for South Warwickshire

No comment.

CHAPTER 5. DELIVERING SOUTH WARWICKSHIRE’S ECONOMIC NEEDS

Q-E1.1. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of employment need across South Warwickshire?

No comment.

Q-E1.2. If your answer to E-1.1 is No, what would be a more appropriate approach to calculating future employment needs for this Local Plan?

N/A

Q-E2. Please select all options which are appropriate for South Warwickshire

- **Option E2a: Include a policy which encourages businesses to be low carbon**

¹⁶ Cotswolds National Landscape Board (2021) *Landscape-led Development Position Statement* ([link 1](#) – main document; [link 2](#) – appendices). See Appendix 5, including footnote 36.

- **Option E2b: Do not include a policy encouraging businesses to be low carbon**
- **Option E2c: Include a policy which looks to identify sites or development zones which are targeted at businesses wishing to be innovative towards a low carbon economy.**

Options E2a and E2c.

We consider that both of these options are essential components of tackling the climate emergency.

Q-E3. Please select all options which are appropriate for South Warwickshire

- **Option E3a: Include a policy expanding on SDC's current existing policy**
- **Option E3b: Have separate policies for individual sectors.**
- **Option E3d: None of these.**

No comment.

Q-E4.1. Please select the option which is most appropriate for South Warwickshire

- **Option E4.1a: Include a policy supporting diversification.**
- **Option E4.1b: Do not include a specific policy on diversification.**

Option E4.1a.

Diversification is essential for ensuring that rural areas continue to thrive and make a positive contribution to the local economy. Having a specific policy supporting diversification will help to achieve this.

Within the Cotswolds National Landscape and its setting, this diversification should be delivered in a way that is compatible with - and, ideally, positively contributes to – conserving and enhancing the natural beauty of the area.

Q-E4.2: Please select the option which is most appropriate for South Warwickshire

- **Option E4.2a: Include a policy supporting small-scale employment opportunities in rural areas**
- **Option E4.2b: Do not include a policy supporting small-scale employment opportunities in rural areas**

Supporting small-scale employment opportunities is essential for ensuring that rural areas continue to thrive and make a positive contribution to the local economy. Having a specific policy supporting small-scale employment opportunities will help to achieve this.

Within the Cotswolds National Landscape and its setting, these small-scale employment opportunities should be delivered in a way that is compatible with - and, ideally, positively contributes to – conserving and enhancing the natural beauty of the area.

Q-E5. Please select the option which is most appropriate for South Warwickshire

- **Option E5a: Include a policy which supports a range of business units.**
- **Option E5b: Do not include a policy in Part 1.**

No comment.

Q-E6. Please select the option which is most appropriate for South Warwickshire

- **Option E6a: Include a policy which protects South Warwickshire's economic assets.**
- **Option E6b: Do not include a policy protecting all these economic assets.**

No comment.

Q-E7.1. Please select the option which is most appropriate for South Warwickshire

- **Option E7.1a: Include a policy directing employment to the Core Opportunity Area.**
- **Option E7.1b: Do not include a policy directing employment to the Core Opportunity Area.**

No comment.

Q-E7.2. Please select the option which is most appropriate for South Warwickshire

- **Option E7.2a: Include a policy relating to additional economic growth at the major investment sites.**
- **Option E7.2b: Do not include a policy relating to additional economic growth at the major investment sites.**

No comment.

Q-E8.1. Do you agree that the existing employment allocations, including the revisions to Atherstone Airfield, should be carried over into the SWLP?

Don't know.

Q-E8.2. If, no please list the sites that should be excluded and give reasons.

N/A

Q-E8.3. Do you agree that proposals seeking the loss of a business, commercial or community building or facility should be subject to marketing, viability and alternative use tests?

Don't Know

Q-E8.4. Please specify what you consider to be appropriate tests

N/A

Q-E9. Please select the option which is most appropriate for South Warwickshire

- **Option E9a: Identify retail areas on the policies map as well as Town Centre boundaries, within the Part 1 plan.**
- **Option E9b: Save existing town centre and retail area boundaries in the Part 1 plan, and address this in Part 2.**

No comment.

Q-E10. Do you agree that Tourism should be addressed in Part 2 of the South Warwickshire Local Plan?

Yes

Q-E11. Please add any comments you wish to make about delivering South Warwickshire's economic needs

No comment.

CHAPTER 6. DELIVERING HOMES THAT MEET THE NEEDS OF ALL OUR COMMUNITIES

Q-H1-1. The HEDNA is proposing that we move away from an approach where future household needs are based on the 2014-based household projections towards a trend-based approach. Do you think that the HEDNA evidence provides a reasonable basis for identifying future levels of housing need across South Warwickshire?

Don't Know.

Paragraph 61 of the National Planning Policy Framework (NPPF) requires the 'standard method' to be used for calculating housing need unless 'exceptional circumstances' justify an alternative approach. It is not clear if the justification for the proposed alternative approach constitutes exceptional circumstances.

We are pleased to see the acknowledgment, in the Issues and Options consultation document, that the standard method and HEDNA figures do not reflect any assessment of whether those needs can be met within each local authority area. In this context, it is important to note paragraph 11b and footnote 6 of the NPPF, which identifies certain exemptions to the requirement to meet the following needs through the plan-making process: (i) objectively assessed needs; and (ii) needs that cannot be met within neighbouring areas. In other words, there are circumstances in which the housing requirement figure (i.e., the amount of housing that should be provided for once relevant constraints have been factored in) could potentially be less than the housing need figure (i.e., the unconstrained assessment of housing need).

This is expanded on in the Government's 'Natural Environment' planning practice guidance, which states that:

- The NPPF's policies for protecting Areas of Outstanding Natural Beauty (AONBs) '*may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process*'; and
- AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*'.¹⁷

¹⁷ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041 Reference ID: 8-041-20190721

For the second of these points, we interpret this to relate to both: (i) unmet needs arising from neighbouring local authority areas; and (ii) unmet needs arising within the local authority area but outside of the Cotswolds National Landscape.

These points should be factored in when considering an alternative approach to the 'standard method' and / or when determining the housing requirements for the area and the spatial distribution of this housing.

Q-H1-2. If your answer to H1-1 is No, what would be a more appropriate approach to calculating future housing needs for this Local Plan?

N/A

Q-H2-1. What is the best way to significantly increase the supply of affordable housing across South Warwickshire?

No comment.

Q-H2-2. Please select the option which is most appropriate for South Warwickshire:

- **Option H2-2a: A single South Warwickshire wide affordable housing requirement.**
- **Option H2-2b: Separate affordable housing requirements for Stratford-on-Avon and Warwick Districts**
- **Option H2-2c: A more localised approach with separate affordable housing requirements for different localities across South Warwickshire**

Option H2-2c.

This is an important consideration for the Cotswolds National Landscape, which is a designated Area of Outstanding Natural Beauty (AONB). Paragraph 176 of the National Planning Policy Framework (NPPF) states that the scale and extent of development in AONBs (and National Parks) should be limited. As such, these protected landscapes are not suitable locations for unrestricted housing. Instead, *'the expectation is that new housing will be focussed on meeting affordable housing requirements'*¹⁸ (and supporting local employment opportunities and key services).

The term 'affordable housing' covers various types of housing, some of which are intended to be affordable in the longer term and some of which are not. A key priority in the protected landscapes is to *'ensure that affordable housing remains so in the longer term'*.¹⁹

Paragraph 64 of the NPPF allows for on-site provision of affordable housing on sites of 5 units or fewer in designated rural areas, including in AONBs. The Government-commissioned Landscapes Review recommends that *'local planning authorities in AONBs should also make use of the provision*

¹⁸ Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* ([link](#)).

Paragraph 79. AONBs are afforded the same level of protection as National Parks in national planning policy and are subject to the same requirement for the scale and extent of development to be limited. As such, the same principles that are set out in Circular 2010, in this regard, should also apply to AONBs.

¹⁹ Defra (2010) *English National Parks and the Broads – UK Government Vision and Circular 2010* ([link](#)). Paragraph 79.

*that allows them to demand on-site affordable housing contributions on all sites [in AONBs], including developments of five homes or fewer’.*²⁰

Based on the above points – and based on best practice within protected landscapes²¹ - we would like to make the following recommendations with regards to (affordable) housing development in the Cotswolds National Landscape:

- Housing provision in the Cotswolds National Landscape should be focussed on – and prioritise – meeting affordable housing requirements.
- Within the context of Government requirements and locally identified needs, priority (in the Cotswolds National Landscape) should be given to the provision of housing that is affordable in perpetuity, including social rented housing.
- The South Warwickshire Local Plan should require:
 - At least 50% affordable housing in market housing developments within the Cotswolds National Landscape.
 - 100% affordable housing on Rural Exception Sites (at least within the Cotswolds National Landscape), with a lower percentage only being permitted in exceptional circumstances and the absolute minimum being 75%;
 - On-site affordable housing provision for housing developments of five units or fewer (ideally, on developments of two or more units).

Further guidance on this topic is provided in the Board’s Housing Position Statement.²²

Q-H2-3. How should South Warwickshire best address the specialist needs for older people?

No comment.

Q-H3. Please select all options which are appropriate for South Warwickshire

- **Option H3a: Do not seek to include minimum space standards in a policy in the SWLP.**
- **Option H3b: Apply Nationally Described Space Standards to developments across South Warwickshire based on locally derived evidence.**
- **Option H3c: Include a requirement to meet optional Building Regulations M4(2)/M4(3) as standard. These are focussed upon ensuring appropriate accessibility standards.**
- **Option H3d: None of these.**

No comment.

Q-H4-1. Do you agree with the approach of contributing to meeting the Birmingham and Black Country HMA shortfall to 2031 on the identified sites in Stratford-on-Avon District?

Yes.

²⁰ Defra (2019) *Landscapes Review Final Report* ([link](#)). Proposal 18: A new National Landscapes Housing Association to build affordable homes.

²¹ Cotswolds National Landscape Board (2021) *Housing Position Statement* ([link 1](#) – main document; [link 2](#) – appendices). Appendix 2 – Case Studies.

²² Cotswolds National Landscape Board (2021) *Housing Position Statement* ([link 1](#) – main document; [link 2](#) – appendices).

In particular, we support the statement the following statement from the Issues and Options consultation document:

- *Given the size of South Warwickshire it is considered that any additional needs can be accommodated outside of any protected areas (e.g., Cotswolds National Landscape/AONB). One exception could be areas designated as Green Belt.*

This would be consistent with paragraph 11b of the National Planning Policy Framework (NAAONB) and with the Government’s ‘Natural Environment’ planning practice guidance²³, particularly given the following factors:

- The Cotswolds National Landscape occupies a small proportion of South Warwickshire (approximately 8%).
- The Cotswolds National Landscape is the part of South Warwickshire that is furthest from Birmingham, the Black Country or Coventry.
- A large proportion of the Cotswolds National Landscape within South Warwickshire consists of the Cotswold escarpment, escarpment outliers or high wold. The escarpment and high wold (including the views associated with them) are ‘special qualities’ of the Cotswolds National Landscape. The views associated with the escarpment outliers are a key feature / characteristic of that landscape character type.

Q-H4-2. Please add any comments you wish to make about the scale of the shortfall from the Birmingham and Black Country HMA that South Warwickshire should accommodate within the South Warwickshire Local Plan.

No comment.

Q-H4-3. If we are required to meet housing shortfalls from outside of South Warwickshire, how best and where should we accommodate such shortfalls?

In principle, the housing shortfall would best be accommodated by applying Growth Strategy Option 4 (Sustainable Travel and Economy), focussing on suitable areas that are relatively close to the urban areas where this shortfall arises and / or close to public transport options that provide good connectivity with these areas, having regard to (but not necessarily excluding) potential constraints such as Green Belt.

Q-H5. Please select all options which are appropriate for South Warwickshire

- **Option H5a: Identify a range of specific sites within or on the edge of existing settlements of approximately 5-20 homes in size to be developed only for self and custom build homes.**
- **Option H5b: Require large developments of, say, over 100 homes to provide a proportion of self and custom-build homes within the overall site.**
- **Option H5c: Rely on a case-by-case approach whereby planning applications for self and custom build homes will be assessed against a range of criteria to determine their suitability.**

No comment.

²³ <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041 Reference ID: 8-041-20190721.

Q-H6: Please select all options which are appropriate for South Warwickshire

- **Option H6a: Identify a range of specific sites in sustainable locations of up to 15 pitches/plots in size to be developed only for Gypsy and Traveller and Travelling Showpeople homes**
- **Option H6b: Require large developments of over 500 homes to provide a proportion of Gypsy and Traveller and Travelling Showpeople homes on the edge of the overall site.**
- **Option H6c: Rely on a case-by-case approach whereby planning applications for Gypsy and Traveller and Travelling Showpeople homes will be assessed against a range of criteria to determine their suitability.**

No comment.

Q-H7: Please add any comments you wish to make about delivering homes in South Warwickshire.

No comment.

CHAPTER 7. A CLIMATE RESILIENT AND NET ZERO CARBON SOUTH WARWICKSHIRE

Q-C1.1. Please select the option which is most appropriate for South Warwickshire

- **Option C1.1a: Identify and allocate land that is considered suitable for wind or solar energy generation schemes.**
- **Option C1.1b: Do not allocate land, but have a policy supporting renewable energy generation schemes in principle, subject to criteria on the suitability of the location.**
- **Option C1.1c: None of these.**

Option C1.1c.

We consider that it is appropriate to identify land that is considered suitable for wind or solar energy generation schemes. However, we are not convinced that it is necessary, or appropriate, to 'allocate' such land. It would be sufficient for the option to be:

- Identify land that is considered suitable for wind or solar energy generation schemes.

An allocation normally relates to a specific *site* (rather than *area*) where a specific type and scale of development is considered to be both suitable and deliverable (i.e., likely to be available, developed and built open within the plan period). In many cases, such sites will have been put forward by a developed in a 'call for sites'. If allocated sites are not deliverable then the development plan would not be 'effective' and, by extension, would not be 'sound'.

There is nothing in national planning policy or guidance to say that areas that are identified as being suitable for wind or solar energy have to be deliverable, in the context outlined above. In other words, it doesn't have to be likely that the land would be available, or that the development would be delivered, within the plan period. Nor would it be appropriate to limit the identification of suitable areas to those locations that would be deliverable, in this context.

Suitable areas, in the context of paragraph 155 and footnote 54 of the National Planning Policy Framework (NPPF), could potentially cover substantial areas of land. As such, they could potentially be larger than the area that might be required for individual wind or solar energy development

proposals. Allocating suitable areas would potentially give the impression that the whole of the suitable area would, or should, be developed, which may not be appropriate.

Instead of allocating land, it may be more appropriate to treat suitable areas as ‘areas of search’ – spatial areas that are identified as being potentially suitable for wind and solar energy subject to more detailed assessment at the project stage.

We do not think that it would be appropriate to not *identify* suitable areas as this would, in effect, rule out wind energy proposals. However, again, this does not mean that the suitable areas have to be allocated.

Q-C1.2. Are there any other criteria which should be considered when assessing proposals for large scale renewable energy developments?

The criteria listed in the Issues and Options consultation document provide a useful starting point. Other key considerations include grid connectivity, the additional infrastructure that may be required to facilitate delivery of a renewable energy scheme and cumulative impacts.

Question Q-C1.2 is focussed on the criteria that should be considered when assessing proposals. However, it is also important to identify (and consult on) the methodology that would be used for identifying ‘suitable areas’.

We recommend that the identification of suitable areas should be underpinned by a combination of:

- a landscape sensitivity assessment (LSA);
- constraints mapping (e.g., proximity to: designated nature conservation and historic environment designations; priority habitats; existing infrastructure, etc., with buffer zones being applied where appropriate;
- technical considerations (e.g., wind speed, grid connectivity, etc.).

Areas of high landscape sensitivity should be excluded from the suitable areas, especially in the Cotswolds National Landscape and its setting.

Within the Cotswolds National Landscape and its setting, the LSA should have regard to the ‘special qualities’ of the Cotswolds National Landscape²⁴ and to guidance published by the Cotswolds National Landscape, including the Cotswolds AONB Landscape Character Assessment (including the key features / characteristics of the relevant landscape character types) and the Cotswolds AONB Landscape Strategy & Guidelines.

Q-C2. Please select the option which is most appropriate for South Warwickshire

- **Option C2a: Require decentralised energy systems to be utilised for developments over a relevant size threshold, where viable**
- **Option C2b: Have a policy encouraging the consideration of decentralised energy systems**
- **Option C2c: None of these**

Option C2a.

²⁴ The ‘special qualities’ of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan ([link](#)).

It would be better to have a requirements for decentralised energy systems for development over a relevant size thresholds than a more generic policy encouraging the consideration of such systems.

We acknowledge that, for Option C2a to be effective, it may be necessary to concentrate planned growth into a smaller number of larger developments. However, development of this scale would not be appropriate in the Cotswolds National Landscape and is not likely to be appropriate within the immediate setting of the National Landscape.

Q-C3.1. Do you think we should develop a carbon offsetting approach to new developments where it is demonstrated that it is not possible to achieve net carbon zero requirements on site?

Yes.

Within the Cotswolds National Landscape and its setting, such offsetting schemes should be delivered in a way that is compatible with - and, ideally, positively contributes to – the natural beauty of the National Landscape.

Q-C3.2. Do you have any proposals for projects/schemes within South Warwickshire in which developer (or local business) offset payments could be invested to secure emissions removals or reductions?

No comment.

Q-C4.1. Please select all options which are appropriate for South Warwickshire

- **Option C4.1a: Do not have a policy and allow new development to comply with the national building regulation requirements, which may change over time.**
- **Option C4.1b: Set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments.**
- **Option C4.1c: Have a phased approach to net zero carbon, setting a future date by which all new development will need to achieve net zero standards. In the intervening period new development will need to meet building regulation standards.**
- **Option C4d: None of these.**

Option C4.1c.

Option C4.1c provides the opportunity to impose more stringent requirements, which reflect best practice, than the minimum legal requirement.

Q-C4.2. What scale of development should the requirements apply to?

- **Option C4.2a: All new development**
- **Option C4.2b: Development over a certain size**

Option C4.2a.

Q-C5.2. Please select all options which are appropriate for South Warwickshire

- **Option C5a: Include a policy that requires net zero carbon requirements for all building proposals that require planning permission – including conversions, changes of use, and householder residential applications**

- **Option C5b: Include a policy that encourages the retrofit of climate change measures, such as solar panels and heat pumps, including those on traditional buildings or within historic areas.**
- **Option C5c: None of these.**

Option C5b.

Option C5b encourages the retrofit of climate change measures whilst allowing for a more flexible approach in more sensitive locations where it will be important for solutions to be sought to minimise adverse impacts on local surroundings.

This consideration of sensitive locations is particularly important in the Cotswolds National Landscape, where cultural heritage (including the historic environment) is one of the features that contributes to the natural beauty of the area and where the local distinctiveness of the built environment (including the vernacular architecture and use of local Cotswold stone) is one of the area's special qualities.

An alternative option would be to apply Option C5b in the Cotswolds National Landscape, Conservation Areas and in listed buildings and their settings and to apply Option C5a elsewhere.

Q-C6.1. Please select the option which is most appropriate for South Warwickshire

- **Option C6.1a: Include a policy that requires new developments to have a whole lifecycle emissions assessment, with a target for 100% reduction in embodied emissions compared to a 'business-as-usual' approach to construction**
- **Option C6.1b: Include a policy that has different whole lifecycle reduction targets for different scales and types of developments and for different time periods.**
- **Option C6.1c: None of these.**

Option C6.1.

Q-C6.2. If a phased approach is used, what dates and thresholds should be used? For example, achieve 80% reduction by 2030 and 100% reduction by 2040.

No comment.

Q-C7. Please select the option which is most appropriate for South Warwickshire

- **Option C7a: Include a policy that requires new developments and changes to existing buildings to incorporate measures to adapt to higher temperatures.**
- **Option C7b: Do not include a policy that requires new developments and changes to existing buildings to incorporate measure to adapt to higher temperatures.**
- **Option C7c: None of these.**

Option C7a.

Q-C8. Please select the option which is most appropriate for South Warwickshire

- **Option C8a: Include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events.**
- **Option C8b: Do not include a policy that goes beyond existing building regulations, requiring new development and changes to existing buildings to incorporate measures to adapt to flood and drought events.**
- **Option C7c: None of these.**

Option C8a.

Q-C9.1. Please select the option which is most appropriate for South Warwickshire

- **Option C9.1a: Include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity.**
- **Option C9.1b: Do not include a policy requiring new development and changes to existing buildings to incorporate measures to increase biodiversity.**
- **Option C9.1c: None of these.**

Option C9.1a.

The Environment Act 2021 sets targets for new development to provide a minimum of 10% biodiversity net gain (BNG). This statutory requirement should be reflected in the South Warwickshire Local Plan.

Consideration should be given to setting higher BNG requirements than the statutory 10% BNG. Research in Kent has identified that a shift from 10% to 15% or 20% BNG will not materially affect viability in the majority of instances when delivered onsite or offsite.²⁵

High BNG requirements are particularly relevant in the Cotswolds National Landscape. For example:

- Natural heritage (including biodiversity) is one of the factors that contributes to the natural beauty of AONBs – as such, there is a statutory requirement to have regard to conserving and *enhancing* natural heritage / biodiversity in AONBs.
- The Government-commissioned Landscapes Review has stated that AONBs and National parks should form the backbone of Nature Recovery Networks - joining things up within and beyond their boundaries;²⁶
- The Prime Minister has committed to protect 30% of UK land for nature by 2030 (30 by 30)²⁷ ... Achieving 30 by 30 will rely on improvements in how these areas [AONBs and National Parks] are protected and managed for nature recovery.²⁸

²⁵ Kent County Council (2022) *Viability Assessment of Biodiversity Net Gain in Kent – Final Report*. ([Link](#)).

²⁶ Defra (2019) *Landscapes Review Final Report* ([link](#)). Proposal 4, page 52.

²⁷ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>. This press release implies that the 30% figure includes the entirety of AONBs: ‘Existing National Parks, Areas of Outstanding Natural Beauty and other protected areas already comprise approximately 26% of land in England. An additional 4% ... will be protected to support the recovery of nature’. However, the Government’s response to the Landscapes Review states that ‘at present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety’.

²⁸ Landscapes review: government response ([link](#)). Since the publication of the review - nature and climate.

High BNG requirements are also particularly relevant in areas that are identified as being a priority for nature recovery.

We recommend that the South Warwickshire Local Plan should set a BNG requirement of 20%, at least in the Cotswolds National Landscape and in areas identified as being high priority for nature recovery.

Q-C10.1. Please select all options which are appropriate for South Warwickshire

- **Option C10.1a: Include a policy requiring new development and changes to existing buildings to undertake a Climate Change Risk Assessment.**
- **Option C10.1b: Include a policy requirement for proposals for new development and changes to existing buildings to provide a climate change checklist setting out the appropriate range of adaptation and mitigation measures to be incorporated.**
- **Option C10.1c: None of these.**

Options C10.1a and C10.1b.

Q-C10.2. Please add any comments you wish to make about Climate Change Risk Assessments in South Warwickshire.

No comment.

Q-C11. Please select the option which is most appropriate for South Warwickshire

- **Option C11a: Do not include a policy on water quality in the SWLP Part 1.**
- **Option C11b: Include policy along similar lines to the existing policies, where supported by up-to-date evidence.**
- **Option C11c: None of these.**

Option C11b.

As indicated in the Issues and Options consultation document, there have been recent issues with sewage leaks in some locations across South Warwickshire. This is a common problem across many parts of the country. One of the causes of sewage pollutions is that some sewage treatment works are already at, or beyond, capacity. As such, new development can further exacerbate this issue.

One option for addressing this issue would be for the Local Plan to impose ‘Grampian conditions’²⁹ whereby the new housing should not be occupied until there is sufficient capacity in the sewage treatment infrastructure to deal with the sewage waste arising from the development (and from other anticipated development in the locality).

In the context of the Cotswolds National Landscape, it is important to note that one of the ‘special qualities’ of the National landscape is the ‘*river valleys...with high quality water*’.³⁰

²⁹ <https://www.planningofficers.org.uk/uploads/news/UseOfGrampianConditions.pdf>

³⁰ The special qualities of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023 ([link](#)).

Q-C12. Please add any comments you wish to make about water management or flood risk in South Warwickshire.

No comment.

CHAPTER 8. A WELL-DESIGNED AND BEAUTIFUL SOUTH WARWICKSHIRE

Q-D1.1. Do you agree that this is an appropriate range of topics for a strategic design policy?

Yes.

Q-D1.2. If no, please indicate why.

Not applicable.

Q-D2.1. Please select all options which are appropriate for South Warwickshire

- **Option D2a: Develop a South Warwickshire Design Guide A single reference document.**
- **Option D2b: Develop design guides and/or design codes for specific places (e.g., existing settlements or groups of settlements, or an 'area' in the case of a new settlement) where the spatial strategy identifies significant change.**
- **Option D2c: Develop design guides/codes for strategic development sites/locations.**
- **Option D2d: None of these.**

Option D2b.

Developing design guides and / or design codes for specific places will be particularly important for the Cotswolds National Landscape.

Several of the 'special qualities' of the National Landscape relate to the built environment, including:

- The unifying character of the limestone geology – its visible presence in the landscape and use as a building material;
- Variations in the colour of the stone from one part of the AONB to another , which add a vital element of local distinctiveness.
- Distinctive settlements, developed in the Cotswold vernacular (with) high architectural quality and integrity.

As such, these are amongst the aspects of the area's natural beauty which make the area distinctive and nationally important.

Design guides and / or design guides covering the Cotswolds National Landscape section of South Warwickshire should have regard to these special qualities and to relevant guidance published by the Cotswolds National Landscape Board, including:

- Cotswolds AONB Management Plan;³¹

³¹ Cotswolds National Landscape Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CE3 (Local Distinctiveness) is particularly relevant in this regard. (N.B. A new AONB Management Plan, covering the period 2023-2025 has recently been adopted by the Board and soon be published on the Board's website).

- Cotswolds AONB Landscape Character Assessment;³²
- Cotswolds AONB Landscape Strategy & Guidelines;³³
- Cotswolds AONB Local Distinctiveness & Landscape Change.³⁴

Regard should also be given to the Cotswolds Natural Character Area Profile.³⁵

Q-D3. Please select all options which are appropriate for South Warwickshire

- **Option D3a: Include a policy which underlines the relevance and importance of density, but which does not identify an appropriate minimum density or range of densities across South Warwickshire.**
- **Option D3b: Include a policy which specifies a minimum density requirement across South Warwickshire, whilst emphasising that the minimum may be exceeded. This minimum could for example be set at a similar level to the existing policy in Warwick District - i.e., minimum 30d.p.h.**
- **Option D3c: Identify appropriate density ranges for different locations /areas across South Warwickshire are specify these ranges in policy. These ranges could be based upon the prevailing characteristics of existing places.**
- **Option D3d: Identify appropriate density ranges for different locations/areas across South Warwickshire based upon accessibility and potential accessibility of these places.**
- **Option D3e: None of these.**

Option D3c.

This is the most relevant option because different settlements and / or localities are likely to have different levels of density.

The principle of basing density ranges upon the prevailing characteristics of existing places is particularly important in locations such as the Cotswolds National Landscape. For example, that should influence the density range include:

- Settlement type
 - Market town
 - Compact village
 - Dispersed village
 - Compact hamlet
 - Dispersed hamlet
 - Settlement form:
- Settlement type
 - Linear
 - Radial
 - Organic
 - Planned

³² Cotswolds National Landscape Board (2004) *Cotswolds AONB Landscape Character Assessment* ([link](#)).

³³ Cotswolds National Landscape Board (2016) *Cotswolds AONB Landscape Strategy & Guidelines* ([link](#)).

³⁴ Cotswolds National Landscape Board (2004) *Cotswolds AONB Local Distinctiveness and Landscape Change* ([link](#)).

³⁵ Natural England (2015) *Natural Character Area (NCA) Profile 107: Cotswolds* ([link](#)). The Cotswolds National Landscape also extends into: NCA 95 (Northamptonshire Uplands); NCA 96 (Dunsmore & Feldon); and NCA 107 (Severn & Avon Vales).

- External form
 - Skyline
 - Settlement edge (soft / hard)

Further information on these topics is provided in the Board publication ‘Cotswolds AONB Local Distinctiveness and Landscape Change’.³⁶

The issue of density is also relevant for settlements within the setting of the Cotswolds National Landscape as the density of development may influence the extent to which the development affects views from the National Landscape.

When setting density ranges, it is also important to ensure that the density range makes sufficient provision for green infrastructure, open / recreational space and climate mitigation and adaptation measures.

Q-D4. Do you agree that this is an appropriate range of topics for a policy on the design of safe and attractive streets?

No comment.

Q-D4.2. If no, please indicate why.

Not applicable.

Q-D5. Should we continue with the approach to include a high-level strategic policy within the Part 1 plan and to utilise heritage assessments to inform the growth strategy, and delay detailed policies to Part 2?

Yes.

The Local Plan should acknowledge that cultural heritage (including the historic environment) is one of the factors that contributes to the natural beauty of the Cotswolds National Landscape. It should specify that this topic would be taken into account when assessing the potential impact of proposed developments on the Cotswolds National Landscape.

Relevant ‘special qualities’ of the National Landscape include:³⁷

- Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks.
- A vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olympicks, cheese rolling and woolsack races.

³⁶ Cotswolds National Landscape Board (2004) *Cotswolds AONB Local Distinctiveness and Landscape Change* ([link](#)). Chapter 4.

³⁷ The special qualities of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023 ([link](#)).

Q-D6. Please add any comments you wish to make about a well-designed and beautiful South Warwickshire.

No comment.

CHAPTER 9. A HEALTHY, SAFE AND INCLUSIVE SOUTH WARWICKSHIRE

Q-W1. Should the Part 1 plan include a policy on pollution?

Yes.

In the context of the Cotswolds National Landscape, two particularly relevant issues and light pollution and noise pollution, as these adversely affect the dark skies and tranquillity of the National Landscape, which are two of the area's 'special qualities'.

The policy on pollution should explicitly address these two forms of pollution. The supporting text should explicitly address the relevance / significance of these two forms of pollution in relation to the Cotswolds National Landscape.

The issue of tranquillity and dark skies are addressed in Policies CE4 and CE5, respectively of the Cotswolds AONB Management Plan 2018-2023,³⁸ which provides some useful wording in relation to noise and light pollution. They are also addressed in the Board's position statements on: (i) tranquillity³⁹; and (ii) dark skies and artificial light⁴⁰. We recommend that the supporting text for the pollution policy should explicitly refer to these two position statements.

With regards to road traffic, we recommend that the supporting text for the pollution policy should explicitly refer to the 'Guidelines for the Assessment of Road Traffic', in particular, the two 'rule of thumb' thresholds specified in paragraph 3.1 for Environmental Impact Assessments:

1. Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%).
2. Sensitive areas where traffic flows have increased by 10% or more.

In other words, the policy should specify that an EIA would normally be required where a proposed development would result in an increase in traffic flows that exceed these thresholds.

In this context, the Cotswolds National Landscape should be treated as a 'sensitive area'. The Board has addressed this issue in its Tranquillity Position Statement which applies the following thresholds:⁴¹

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

³⁸ Cotswolds National Landscape Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policies CE4 and CE5.

³⁹ Cotswolds National Landscape Board (2019) *Tranquillity Position Statement* ([link](#)).

⁴⁰ Cotswolds National Landscape Board (2019) *Dark Skies and Artificial Light Position Statement* ([link 1](#) – main document; [link 2](#)- Appendix A; [link 3](#) - Appendix B; [link 3](#) – Appendix C).

⁴¹ Cotswolds National Landscape Board (2019) *Tranquillity Position Statement* ([link](#)). Section 4.5.

Q-W2. Please select the option which is most appropriate for South Warwickshire

- **Option W2a: Include a policy on Health Impact Assessments.**
- **Option W2b: Do not include a policy on Health Impact Assessments.**

Option W2a.

Q-W3. Please select the option which is most appropriate for South Warwickshire

- **Option W3a: Include an overall policy on health.**
- **Option W3b: Do not include a policy on health.**

Option W3a.

Q-W4. Please add any comments you wish to make about a healthy, safe and inclusive South Warwickshire.

The Local Plan should make explicit reference to Natural England's new Green Infrastructure Framework⁴² and, ideally, require development to comply with the standards and other guidance that is set out in the Framework.

CHAPTER 10. A WELL-CONNECTED SOUTH WARWICKSHIRE

Q-T1: Please select all options which are appropriate for South Warwickshire

- **Option T1a: Include no policy on the principles of the 20-minute neighbourhood for new development.**
- **Option T1b: Include reference to the principles of a 20-minute neighbourhood or other similar design approach (e.g., Building for a Healthy Life) within a broader overarching policy.**
- **Option T1c: Include a bespoke policy requiring the principles of 20-minute neighbourhoods to be included within development proposals.**

Option T1b.

The Cotswolds National Landscape Board recognises the benefits of applying the principle of the 20-minute neighbourhood, based on the multiple health and climate change benefits that arise from it. As such, we would support making reference to the principles of a 20-minute neighbourhood within a broader over-arching policy.

However, it may not be possible (or appropriate) for every development to be located within a 10-minute walk of most day-to-day needs (i.e., key facilities, services, etc.).

The most appropriate option might be to indicate, in the relevant policy, that development proposals that are located within a 10-minute walk of key facilities / services (and / or meet the principles of a 20-minute neighbourhood) would be viewed more favourably.

⁴² <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>

Q-T2. Please select the option which is most appropriate for South Warwickshire

- **Option T2a: Include a policy which takes a hierarchical approach in terms of prioritising transport infrastructure.**
- **Option T2b: Do not include a policy which takes a hierarchical approach.**

Option T2a.

In principle, the Cotswolds National Landscape Board would support a policy that prioritises and facilitates alternatives to private car use, including active travel.

Q-T3: Please select the option which is most appropriate for South Warwickshire

- **Option T3a: Include a policy encouraging more sustainable road-based transport for businesses.**
- **Option T3b: Do not include a policy encouraging more sustainable road-based transport for business.**

No comment.

Q-T4: Please provide suggestions for how smart cities technologies could be supported in South Warwickshire.

No comment.

Q-T5: Please add any comments you wish to make about a well-connected South Warwickshire.

A key component of being well-connected is to secure good telecommunications connectivity, including broadband. This would have the added benefit of reducing the need to travel as it would provide more people with the option of working at home.

CHAPTER 11. A BIODIVERSE AND ENVIRONMENTALLY RESILIENT SOUTH WARWICKSHIRE

Q-B1. Please select the option which is most appropriate for South Warwickshire

- **Option B1a: Maintain Areas of Restraint and identify appropriate areas within Warwick District.**
- **Option B1b: Remove Areas of Restraint designations.**
- **Option B1c: Maintain Areas of Restraint within Stratford-on-Avon District but not introduce them into Warwick District.**

Option B1a.

The Cotswolds National Landscape Board supports the principle of helping to protect areas of land that help to preserve the structure and character of settlements.

This principle is an important consideration in the Cotswolds National Landscape. For example, the Board's 'Cotswolds AONB Landscape Strategy and Guidelines' identify the following 'landscape implication' relating to the development, expansion and infilling of settlements.⁴³

- Interruption, weakening or loss of the historic character of settlements and the historic context in how they have expanded, especially the importance of the relationship between the historic core of the settlement and surviving historic features such as churchyards, manor houses, burgage plots, historic farms, pre-enclosure paddocks and closes.

One of the guidelines for addressing this issue is to:

- Avoid proposals that result in the loss of archaeological and historical features or that impact on the relationship of the settlement and its links with surviving historical features.

The Area of Restraint policy would potentially help to address this issue.

Q-B2. Should the Policy on the Vale of Evesham Control Zone be removed, if neighbouring authorities decide not to carry the designation forward?

Yes.

Q-B3. Please select the option which is most appropriate for South Warwickshire

- **Option B3a: Introduce Special Landscape Areas across all of South Warwickshire**
Introducing Special Landscape Areas across all of South Warwickshire.
- **Option B3b: Maintain Special landscape Areas within Stratford-on-Avon District but don't introduce them within Warwick District.**
- **Option B3c: Discard Special Landscape Areas and bolster general landscape policy.**

The Cotswolds National Landscape Board supports the Special Landscape Areas (SLA) policy as it helps to protect these high-quality landscapes, including their associated historic and cultural features, by resisting development proposals that would have a harmful effect on their distinctive character and appearance.

In the context of the Cotswolds National Landscape, SLAs are a useful as a mechanism for helping to protect the setting of the National Landscape (where the SLAs are adjacent to the National Landscape).

To ensure that a consistent approach is taken across the whole of the Plan area, it would make sense to introduce SLAs within Warwick District, assuming that there are landscapes in Warwick District that merit SLA status.

Q-B4. Please select the option which is most appropriate for South Warwickshire

- **Option B4a: Maintain the current policy approach, without the use of a buffer.**

⁴³ The examples provided are included in the Landscape Strategy & Guidelines for all of the individual landscape character types within the Cotswolds National Landscape (for example, Landscape Character Type 1 (Escarpment Outliers) ([link](#)) – Section 1.1).

- **Option B4b: Amend the current policy and include a buffer around the periphery of the Cotswold AONB to ensure that great weight is given to any impacts development within this buffer zone may have on the National Landscape.**

Option B4b.

We agree with the following statement in the Issues and Options consultation document:

- When considering development in and around the Cotswold National Landscape, regard should be given to conserving and enhancing the natural beauty of the area. In particular, great weight should be given to conserving and enhancing the landscape and scenic beauty, including its ‘special qualities’.

Case law has clarified that great weight should be given to the impacts that development outside an Area of Outstanding Natural Beauty (AONB) might have on the natural beauty of the AONB. This includes visual impacts (i.e., impacts on views from the AONB) as well as impacts on dark skies (e.g., increases in light pollution resulting in ‘sky glow’) and tranquillity (e.g., increases in traffic flows through – and along the boundary of the AONB). Further information on this issue is provided in the Board’s position statement on ‘Development in the Setting of the Cotswolds AONB’.⁴⁴ In addition, national planning policy requires that development within the setting of an AONB should be sensitively located and designed to avoid or minimise adverse impacts on the AONB.⁴⁵

The inclusion of a buffer zone around the periphery of the Cotswolds National Landscape, within the Local Plan, would help to ensure that this issue is adequately addressed. For example, for particular types and / or scales of development within this buffer zone, the local planning authority (LPA) development management system should be set up to automatically: (i) identify that potential impacts on the National Landscape should be taken into consideration; and (ii) consult the Cotswolds National Landscape Board. Appendix 2 of this document provides the Board’s suggested consultation thresholds within: (i) the Cotswolds National Landscape; (ii) the setting of the Cotswolds National Landscape.

For development management purposes, we would suggest applying a 3km buffer zone.

It is important to note that, for individual development management proposals, the case officer should be at liberty to take account of AONB considerations and to consult the Cotswolds National Landscape Board for proposals that are further than 3km from the Cotswolds National Landscape boundary. This would potentially be the case for large urban extensions, new settlements or large-scale wind turbines, for example. However, the benefit of applying a buffer zone is that this would be a more automated process within the buffer zone.

It probably wouldn’t be appropriate to automatically class the buffer zone a Special Landscape Area (SLA). This is because the landscape within the buffer zone might not meet the SLA criteria / thresholds. The buffer zone would primarily be a development management tool for taking AONB considerations into account – it would not automatically infer that the landscape within buffer zone was of a particularly high quality.

⁴⁴ Cotswolds National Landscape Board (2016) Development in the Setting of the Cotswolds AONB ([link](#)).

⁴⁵ Ministry of Housing Communities & Local Government (2021) National Planning Policy Framework ([link](#)).

Q-B5. Please select the option which is most appropriate for South Warwickshire

- **Option B5a: Explore and pursue an integrated Environmental Net Gain Policy.**
- **Option B5b: Explore environmental net gain through separate policies.**
- **Option B5c: None of these.**

Option B5b.

The Cotswolds National Landscape Board supports the principle that development should deliver environmental net gain.

However, we are not convinced that an integrated approach is appropriate at this stage, especially given that the practical application of environmental net gain is still in its infancy (except for biodiversity net gain). One of the risks of an integrated environmental net gain approach is that it could be used as a means of trading off a gain in one ecosystem service against a deficit in a different ecosystem service.

A more appropriate way forward may be to explore environmental net gain through separate policies. By utilising appropriate 'indicators' for each of these policies in the Local Plan it may be possible to assess the state of each ecosystem service. If these indicators are reviewed collectively this would provide an overall indication of the extent to which environmental net-gain has been delivered in the Local Plan area over the lifetime of the Local Plan period (reviewed on an annual basis, or other appropriate timescale).

When considering the issue of environmental net gain, it is vitally important to follow the mitigation hierarchy, doing everything possible to first avoid harm and then minimise adverse impacts. Compensation for losses should only come into play as a last resort. As with biodiversity net gain (in relation to international and national nature conservation designations and irreplaceable habitat), there may be some ecosystem service features that are too important to be included within an environmental net gain methodology.

Q-B6. Should the South Warwickshire Local Plan introduce Wildbelts designations?

Don't know.

The aspiration of the Wildbelt designation concept is to aid nature recovery. However, there are already mandatory processes in place to facilitate nature recovery. For example, the Environment Act 2021 established a new mandatory system of spatial strategies for nature recovery – Local Nature Recovery Strategies (LNRS). LNRS are designed as tools to encourage more coordinated practical and focused action and investment in nature. They are intended to help map a nature recovery network, locally and nationally.

Rather than creating any additional designation 'layer' of Wildbelts, we consider that it would probably be more appropriate for the Local Plan to explicitly focus on delivering the aspirations of the LNRS and to focus nature recovery in the areas that would form the nature recovery network. We recommend that the LNRS and any resulting nature recovery plan / map should become part of the Local Plan / development plan.

The Government has identified that protected landscapes, including Areas of Outstanding Natural Beauty (AONBs) such as the Cotswolds National Landscape, are an important component of its

aspirations to ensure that 30% of land is managed for nature by 2030.⁴⁶ In addition, the Government-commissioned Landscapes Review has proposed that protected landscapes should form the backbone of nature recovery networks.⁴⁷ Therefore, we recommend that the Local Plan should explicitly identify the Cotswolds National Landscape as a priority area of nature recovery. The Local Plan should also explicitly have regard to the Cotswolds Nature Recovery Plan.⁴⁸

Q-B7. Do you agree that it is appropriate to highlight links to the Minerals Plan, avoiding the unnecessary duplication of policy within the SWLP?

Yes.

Q-B8.1. Do you agree that the plan should include a policy avoiding development on the best and most versatile agricultural land, unless it can be demonstrated that the harm to agricultural land is clearly outweighed by the benefit of development?

No comment.

Q-B8.2. When considering climate change, biodiversity and economic wellbeing, are there any rural land uses or locations that should be prioritised over others?

As indicated in response to question Q-B6, the Cotswolds National Landscape Board considers that the Cotswolds National Landscape should be a priority area for delivering nature recovery.

Q-B9: Should the plan include a policy requiring the safeguarding of sites of national importance, sites of local importance, and other non-designated sites known to make a positive contribution to biodiversity or geodiversity; unless the benefits of the proposal clearly outweigh the need to protect the site. Where possible conserve and enhance these sites.

Yes.

The Local Plan could avoid simply duplicating national policy by identifying the relevant sites, habitats and species.

National planning policy states that plans should distinguish between the hierarchy of international, national and locally designated sites.⁴⁹ As such, the Local Plan policy should have different policy wording for each level of designation as the level of protection afforded to each level will be different.

However, the importance of locally designated sites should not be underestimated. They constitute a vitally important component of our current ecological network and will play a vitally important role in delivering nature recovery.

The Local Plan policy should address irreplaceable habitats. National planning policy lists several habitats that are considered to be irreplaceable.⁵⁰ However, this list is not exhaustive. We recommend that, in addition to the irreplaceable habitats listed in the National Planning Policy

⁴⁶ <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response/landscapes-review-national-parks-and-aonbs-government-response>

⁴⁷ Defra (2019) *Landscapes Review Final Report* ([link](#)). Proposal 4.

⁴⁸ Cotswolds National Landscape Board (2021) *Cotswolds Nature Recovery Plan* ([link](#)).

⁴⁹ Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* ([link](#)). Paragraph 175.

⁵⁰ Ministry of Housing, Communities and Local Government (2021) *National Planning Policy Framework* ([link](#)). Annex 2: Glossary.

Framework (NPPF), the Local Plan should also explicitly identify the following habitats as being irreplaceable:

- Unimproved grassland that has been in-situ since before 1945.
- Hedgerows that have been in-situ since before the Enclosure Acts.

Q-B10: Please add any comments you wish to make about a biodiverse and environmentally resilient South Warwickshire.

In addition to our responses to questions Q-B1 to QB-10, please also have regard to our response to questions Q-C9.1, relating to biodiversity net gain.

CHAPTER 12. PLAN CONTENT

Q-P1.1: Do you agree with the proposed broad content of the Part 1 plan?

Yes.

Q-P1.2: If no, please indicate why.

Not applicable.

Q-P1.3: Do you agree with the selection of policies to be addressed in the Part 1 plan?

Yes

Q-P1.4: If not, please indicate why.

Not applicable.

Q-P2.1: Are there any areas where equality and inclusivity in planning needs further attention?

Don't Know

Q-P2.2: If yes, please give further details.

Not applicable.

APPENDIX 1. DEVELOPMENT MANAGEMENT CONSULTATION THRESHOLDS WITHIN THE COTSWOLDS NATIONAL LANDSCAPE AND ITS SETTING⁵¹

PRIMARY CONSULTATION THRESHOLDSⁱ

Threshold	Within CNL (within settlement boundaries)	Within CNL (outside of settlement boundaries)	Within setting of CNLⁱⁱ (outside of settlement boundaries)	Within setting of CNL (within settlement boundaries)
1. Major development, as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015: ⁱⁱⁱ				
(a) the winning and working of minerals or the use of land for mineral-working deposits;	Y	Y	Y	N
(b) waste development;	Y	Y	Y	N
(c) the provision of dwellinghouses where:				
(i) the number of dwellinghouses to be provided is 10 or more; or	Y	Y	Y	N
(ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);	Y	Y	Y	N
(d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or	Y	Y	Y	N
(e) development carried out on a site having an area of 1 hectare or more.	Y	Y	Y	N
2. Schedule 1 development under the Town and Country Planning (Environmental Impact Assessment) (EIA) Regulations 2017. ^{iv}	Y	Y	Y	N
3. Schedule 2 development under the EIA Regulations that are above the applicable thresholds and criteria (including EIA scoping opinion consultations and, where appropriate, EIA screening opinion consultations). ^v	Y	Y	Y	N
4. Isolated homes in the countryside (i.e., development proposals covered by paragraph 80 of the National Planning Policy Framework (NPPF)).	N/A	Y	Y	N/A

N.B. The exception to these primary consultation thresholds is minor variations to existing planning permissions (i.e., the Board does not need to be consulted on such proposals).

⁵¹ This has been included in relation to Question B.4, regarding the proposed buffer zone around the Cotswolds National Landscape.

SECONDARY CONSULTATION THRESHOLDS^{vi}

Threshold	Within CNL (within settlement boundaries)	Within CNL (outside of settlement boundaries)	Within setting of CNL ^{vii} (outside of settlement boundaries)	Within setting of CNL (within settlement boundaries)
Proposals for 1-9 dwellings	Y (within Conservation Areas)	Y	N	N
Replacement dwellings where the replacement dwelling is significantly larger than the original.	N	Y	N	N
Significant extensions to existing dwellings (e.g., conversion from single storey to two storey)	N	Y	N	N
Conversion of barns or stables to dwellings	N	Y	N	N
New, isolated barns (i.e., not within a farmyard complex)	N	Y	N	N
New, isolated stables (i.e., not within a farmyard complex)	N	Y	N	N
New equestrian facilities (e.g., a manege)	N	Y	N	N
Land operations that involve significant cut or fill or alterations to landform	N	Y	N	N
Telecoms masts	Y	Y	Y	N
Renewable energy proposals below EIA schedule 2 thresholds'	Y	Y	Y	N
Airport development likely to lead to (increased) overflying of the CNL	Y	Y	Y	Y
Proposals that are likely to increase noise levels within the CNL	Y	Y	Y	Y
Proposals that are likely to increase light pollution (including sky glow) within the CNL	Y	Y	Y	Y
Proposals that are likely to introduce lit elements into the dark, night-time landscape of the CNL	Y	Y	N	N
Amendments / revisions to extant planning permissions involving a significant increase in size, scale or footprint	Y	Y	N	N
Planning applications where previous, closely related cases have been refused planning permission on AONB grounds	Y	Y	Y	Y

NO NEED TO CONSULT THE BOARD

Household extensions within settlement boundaries.

Replacement dwellings within settlement boundaries.

Minor variations to existing planning permissions.

ⁱ The primary consultation thresholds are the thresholds against which the Board's performance as a consultee will be assessed.

ⁱⁱ In this context, the setting of the CNL is the area, outside of the CNL, within which development (by virtue of its nature, scale, extent, siting, design and / or materials used) has the potential to adversely affect the natural beauty of the CNL. Development within the setting of the CNL will need sensitive handling that takes these impacts into account. The potential impact of development outside the CNL on views from the CNL is a particularly important consideration, in this regard. Additional considerations include potential increases in traffic movements within, and along the boundary of, the CNL as a result of such development. These impacts should be given 'great weight', in line with paragraph 176 of the National Planning Policy Framework. Further guidance on this issue is provided in the Board's 'Development in the Setting of the Cotswolds AONB' Position Statement ([link](#)).

ⁱⁱⁱ <http://www.legislation.gov.uk/ukxi/2015/595/article/2/made>. The Board is aware that this is not the same definition of major development that should be applied in the context of paragraph 177 and footnote 60 of the National Planning Policy Framework ([link](#)). However, it does provide a pragmatic threshold above which it would be appropriate for local planning authorities (LPAs) to pro-actively consult the Board. It also a relevant consideration in relation to paragraph 177.

^{iv} <http://www.legislation.gov.uk/ukxi/2017/571/schedule/1/made>

^v <http://www.legislation.gov.uk/ukxi/2017/571/schedule/2/made>. As the Cotswolds National Landscape (CNL) is a 'sensitive area', *all* development proposals of a type listed in Schedule 2 that are within the CNL require screening, including those that are below the 'applicable thresholds and criteria'. However, to ensure a manageable workload, we only need to be consulted on proposals that are above these applicable thresholds and criteria.

^{vi} The secondary consultation thresholds address types of development that fall below the primary consultation thresholds but which still have the potential to adversely affect the natural beauty of the CNL. We would like to be consulted on proposals that match these secondary consultation thresholds. We recognise that some of these secondary consultation thresholds are relatively subjective and, as such, are at the discretion of the case officer.

^{vii} In this context, the setting of the CNL is the area, outside of the CNL, within which development (by virtue of its nature, scale, extent, siting, design and / or materials used) has the potential to adversely affect the natural beauty of the CNL. Development within the setting of the CNL will need sensitive handling that takes these impacts into account. The potential impact of development outside the CNL on views from the CNL is a particularly important consideration, in this regard. Additional considerations include potential increases in traffic movements within, and along the boundary of, the CNL as a result of such development. These impacts should be given 'great weight', in line with paragraph 176 of the National Planning Policy Framework. Further guidance on this issue is provided in the Board's 'Development in the Setting of the Cotswolds AONB' Position Statement ([link](#)).