

**COTSWOLDS CONSERVATION BOARD RESPONSE TO THE
GLOUCESTERSHIRE LOCAL TRANSPORT PLAN CONSULTATION,
7th OCTOBER 2019 (PDF version of email response)**



Sent: 07 October 2019 15:35

Subject: RE: Gloucestershire Local Transport Plan Review (LTP) -
CONSULTATION ISA Scoping Technical Note - Sustainability Issues

Unfortunately, the Cotswolds Conservation Board does not have capacity to provide a full response to the above consultation. However, the Board would like to raise the following points.

A key consideration for the Integrated Sustainability Assessment (ISA) should be the statutory duty to have regard to the purpose of AONB designation (i.e. to conserve and enhance the natural beauty of the AONB), under S.85 of the Countryside and Rights of Way Act 2000. The expectation of this duty is that adverse impacts on the AONB will be: (i) avoided; or (ii) mitigated, where possible. Consideration of 'natural beauty', in this context, should extend well beyond considering landscape and visual impacts. For example, Natural England has identified six factors that contribute to natural beauty:

1. Landscape quality
2. Scenic quality
3. Relative wildness
4. Relative tranquillity (inc. the relates issue of dark skies)
5. Natural heritage (inc. biodiversity)
6. Cultural heritage (inc. historic environment)

The special qualities of the Cotswolds AONB are also a key component of natural beauty. These special qualities are listed in Chapter 2 of the [Cotswolds AONB Management Plan 2018-2023](#).

The Local Transport Plan should also have regard to - and, ideally, be consistent with - the Cotswolds AONB Management and other guidance produced by the Board, including:

- [Cotswolds AONB Landscape Character Assessment](#)
- [Cotswolds AONB Landscape Strategy and Guidelines](#) (which provides guidelines specifically relating to road improvements and traffic)
- [Cotswolds AONB Local Distinctiveness and Landscape Change](#)
- [Positions Statements](#)

With regards to the Board's Position Statements, I would particularly like to bring your attention to the Board's new Position Statements on:

- Tranquillity (adopted by the Board in June 2019).
- Dark Skies and Artificial Light (adopted by the Board in April 2019).

Tranquillity and dark skies, which are also special qualities of the AONB, are of particular relevance to transport planning and so should feature strongly in any sustainability appraisal / assessment.

It is worth noting that the Tranquillity Position Statement makes reference to the Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic'

(attached). These guidelines recommend using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA).

- 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.

The Position Statement notes that AONBs are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, the Board would argue that Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows and HGV numbers. On this basis, it can be argued that proposals that involve an increase in traffic flows - or HGV numbers – on local roads in the AONB of more than 10% are likely to merit an EIA. This could potentially be a useful reference point for the ISA.

The issue of increases in HGV movements is becoming particularly significant across the cluster of mineral sites between Naunton and Snowhill, in the north-west corner of the Cotswolds AONB.

If you have any queries regarding this response, please do get in touch.