17th December 2018

South Worcestershire Development Plan Team Civic Centre Queen Elizabeth Drive Pershore WR10 1PT



Dear Sir / Madam

SOUTH WORCESTERSHIRE DEVELOPMENT PLAN: ISSUES & OPTIONS CONSULTATION

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the Issues & Options consultation for the South Worcestershire Development Plan.

With regards to the questions posed in the Issues & Options consultation document, the Board's response can be summarised as follows:

Question 1 (Evidence Base): The Cotswolds Conservation Board's key recommendation is that there should be an additional study that specifically addresses the two Areas of Outstanding Natural Beauty (AONB) in the Plan area – the Cotswolds AONB and the Malvern Hills AONB. This study should:

- 1. Identify how the statutory duty to have regard to the purpose of AONB designation (the 'duty of regard') has been carried out.
- 2. Assess the housing need arising from within the South Worcestershire section of each AONB.
- 3. Identify if potential allocations in the AONBs would constitute major development.
- 4. Identify how great weight has been given to conserving and enhancing the landscape and scenic beauty of the AONBs.
- 5. Identify how the AONB Management Plans and associated guidance have been taken into account.

Questions 2 and 3 (Vision and Objectives): The Board suggests some amendments to the Vision and Objectives relating primarily to biodiversity and climate change.

Option 10 (Affordable Housing): The Board supports prioritising affordable homes for rent.

Question 10 (Historic Environment): The Board supports the proposed approach to protecting the historic environment.

Option 25 (Design Policy): The Board recommends that the Design Policy should require development in the Cotswolds AONB to accord with the Cotswold Design Code (Appendix D of the Cotswold District Local Plan 2011-2031). We support the requirement for all new housing to achieve Building for Life requirements.

Option 27 (Biodiversity): The Board supports all of the proposed options relating to biodiversity but with a stronger emphasis on requiring development to deliver significant net-gains in biodiversity.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty



Option 29 (Areas of Outstanding Natural Beauty): The Board recommends that part (c) of Policy SWDP Policy 23 should be amended to: '*Development proposals will be required to be consistent with the most up-to-date approved AONB Management Plans*'.

The Board's full response is provided in the attached Response Form.

If you have any queries regarding the Board's response, please do not hesitate to get in touch.

Yours faithfully,

John Mille

John Mills MRTP Planning and Landscape Officer

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