

South Gloucestershire Local Plan November 2020

Phase 1: Issues and Approaches Consultation Response Form

Please be aware that anonymous forms cannot be included and that in order for you to submit your form you **must** include your details below.

The information collected as part of this consultation will also be used by the council in accordance with the data protection principles in the Data Protection Act 1998. The purposes for collecting this data is: to assist in plan making; and to contact you, if necessary, regarding the planning consultation process. Some of the data may be made public as it will form part of the evidence base used to inform the creation of planning policy documents. The above purposes may require public disclosure of any data received on the response form, in accordance with the Freedom of Information Act 2000.

The purpose for holding your personal information is to assist in preparing development plan documents and supporting supplementary planning guidance and advice; and to contact you, if necessary, regarding the planning consultation process relating to their preparation. In order to provide the above service we may share your information with the following:

- Other South Gloucestershire Council departments
- External consultants working on behalf of South Gloucestershire Council
- Other Local Planning Authorities (LPAs)
- Other groups preparing statutory development plans relevant to South Gloucestershire

Please follow the link to our [Privacy Policy](#) and [Data Protection Policy](#) to find out more.

PART ONE - YOUR DETAILS

In circumstances where there are individuals / groups / organisations who share a similar view as to how the plan should evolve, it would be helpful if they make a single response. It would also be useful to state how many people the submission is representing and how the comment was authorised.

Your Details	Your Agent's Details (If applicable)
Reference No (if known*):	Reference No (if known*):
Title: Mr / Mrs / Miss / Ms / Dr / Other: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Mills	Surname:
Forename: John	Forename:
Organisation / Company: Cotswolds Conservation Board	Organisation / Company:
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*If you have been contacted by post, you will find your reference number at the top of the letter under 'Our Ref'

PART TWO – QUESTIONNAIRE COMMENTS

To view the Phase 1 Issues and Approaches document including the sections referred to in this questionnaire, please visit www.southglos.gov.uk/LocalPlan2020.

Question 1: Understanding who is responding

Please help us understand the type of groups and people that are responding and engaging with the preparation of our new Local Plan, by choosing which one of the following stakeholder groups you best represent.

You must provide an answer to this question.

Please only select one option from the list:

- Member of the public
- Business or Company
- Community Group
- Developer, land agent or site promoter
- Registered charity
- Local Councillor
- Neighbourhood Planning Group
- Statutory Body (Environment Agency, Highways Agency, Heritage England, Natural England etc.)
- Town and Parish Council or Clerk
- Utility Company or Infrastructure Provider (Bristol Water, Wessex Water etc.)
- Other (please state below):

If other, please state: Conservation Board

Question 2: Issues

We have set out 55 issues which our Local Plan will need to consider.

Do you agree that these are the right issues for our plan to consider?

- Yes**
- No
- Don't know

Overall, we agree that these are the right issues for the plan to consider.

Please see our response to Question 3 and other questions for further comments on specific topics.

Question 3: Issues

Would you like to comment on any of the issues or add new issues? Please note the name of the issue in your comments, or tell us what additional issues you think our plan should consider:

Issues identified in the consultation document

Issue 9 – Cotswolds Area of Outstanding Natural Beauty

The Cotswolds Conservation Board is pleased to see explicit reference to the Cotswolds Area of Outstanding Natural Beauty (now branded as the Cotswolds National Landscape). This paragraph should also make reference to the need for new development in the setting of the Cotswolds National Landscape to be sensitively located and designed. This would reflect:

- the requirements of the Government’s Planning Practice Guidance¹;
- the wording of the draft National Planning Policy Framework (NPPF) that is currently out for consultation;²
- the fact that case law has established that great weight should be given to the impacts of development in the setting of an AONBs on views from the AONB.³

Issue 27 – Identifying the amount of new homes to plan for

We acknowledge that the government’s ‘standard methodology’ is the starting point for identifying housing need in a local authority area. However, we are very concerned that the text for issue 27 appears to conflate ‘housing need’ and ‘housing requirement’. In doing so, it creates the impression that the housing need figure identified through the standard methodology has to be accommodated regardless of any other considerations. This should not be the case.

The Government has recently provided useful clarification on this issue:⁴

- *Within the current planning system the standard method does not present a ‘target’ in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.*
- *We heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.*

¹ <https://www.gov.uk/guidance/natural-environment#landscape>

² [Draft NPPF for consultation \(publishing.service.gov.uk\)](https://www.gov.uk/government/consultations/draft-national-planning-policy-framework). Paragraph 175.

³ *Stroud District Council v Secretary of State for Communities and Local Government v Gladman Developments Limited* [2015] EWHC 488 (Admin)

⁴ [Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/changes-to-the-current-planning-system)

This clarification reflects the Government's guidance on Housing and Economic Land Availability Assessment.⁵ For example, this guidance allows for the fact that consideration of constraints, such as Green Belt and AONBs, may mean that the housing requirement figure is less than the identified housing need figure:

- **Paragraph 025:** *If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.*

It is also important to note Planning Practice Guidance for development in AONBs, which states that:⁶

- The NPPF's policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process.
- AONBS are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.

We acknowledge that the housing requirement figure for South Gloucestershire will primarily be identified through the West of England Spatial Development Strategy (SDS). We strongly urge South Gloucestershire Council to ensure that the above points are taken into account in the SDS process.

In addition, we strongly urge South Gloucestershire Council to take account of the above points when considering development options in the Cotswolds National Landscape and its setting (and in the Green Belt).

Question 4: Priorities

Do you agree with the potential priorities?

- Yes
 No
 Don't know

Question 5: Priorities

Do you have any comments on the potential priorities?

The Cotswolds Conservation Board broadly agrees with the potential priorities identified in the consultation document. However, we are disappointed that the Cotswolds National Landscape is not explicitly addressed as a priority. In particular, we are disappointed that the consultation document does not prioritise a landscape-led approach to development in the Cotswolds National Landscape and its setting. Further comments on this issue are provided below.

⁵ [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/Housing_and_economic_land_availability_assessment_-_GOV.UK.pdf)

⁶ [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/Natural_environment_-_GOV.UK.pdf). Paragraph 041.

We have provided comments on other relevant, specific priorities (such as renewable energy) in other sections of this consultation response.

Landscape-led approach in the Cotswolds National Landscape and its setting

Almost a quarter of South Gloucestershire lies within the Cotswolds National Landscape. In addition, a large area of South Gloucestershire is in the setting of the Cotswolds National Landscape (i.e. located outside the National Landscape but where development could still potentially have an adverse impact on the National Landscape).

The statutory purpose of designation for the National Landscape is to conserve and enhance the natural beauty of the Cotswolds National Landscape. Development within the Cotswolds National Landscape and its setting should, therefore, be required to be compatible with - and positively contribute to – this purpose, with this requirement being considered from project inception. This is a ‘landscape-led’ approach to development.

Further information and recommendations on this landscape-led approach is provided in the Board’s draft Position Statement on Planning and Development, which the local authorities have recently been consulted on.

We recommend that the South Gloucestershire Local Plan should explicitly identify this ‘landscape-led’ approach as a priority for the Cotswolds National Landscape and its setting. This would be consistent with the landscape-led approach that is taken in Local Plan documents for other protected landscapes, including the South Downs National Park and the Arnside and Silverdale AONB.

Explicitly advocating this landscape-led approach in the Local Plan is particularly important given that the Government-commissioned ‘Landscapes Review Final Report’ (sometimes referred to as the ‘Glover Review’) has proposed a strengthened place for national landscapes in the planning system.⁷

Further guidance on this landscape-led approach, including the exceptional circumstances that might apply, is provided in response to Question 16.

Question 6: Strategy- Where will development go?

Do you agree with the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

Please see our comments in response to Question 7.

Question 7: Strategy- Where will development go?

Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

⁷ [DEFRA - Landscapes Review - Final Report 2019 \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414242/DEFRA_-_Landscapes_Review_-_Final_Report_2019_(publishing.service.gov.uk).pdf). Proposal 6.

Building Block 1 (Existing urban areas)

Building Block 1 fits well with the Government's proposed 'cities and urban centre uplift', which focusses on the top 20 largest cities and urban centres in England, including Bristol.

The Government has identified three key reasons for following this 'uplift' approach:⁸

1. Building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, medical facilities and shops.
2. There is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land and thereby protect our green spaces.
3. Our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel.

The Government has indicated that this 'uplift' is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. However, the three key reasons outlined above would also, arguably, apply to the 'potential urban lifestyle locations' identified in the draft Local Plan.

Building Block 2 (expanding our main urban areas through small or large urban extensions).

The explanatory text on page 64 of the consultation document states that '*this building block would see expansion into locations beyond the communities of the North and East Fringe*'. However, whilst the consultation document expands on the 'urban lifestyles' approach of 'Building Block 1' and 'sustainable rural villages and settlements' (Building Block 4), it provides very little supporting information on Building Block 2. This makes it difficult to provide informed comments on the implications of Building Block 2.

It is worth noting that the urban area of the 'East Fringe', bounded on its eastern side by the A4175, comes within approximately 1.5km of the Cotswolds National Landscape boundary. Therefore, if eastward expansion beyond the A4175 is being considered, this should include an assessment of potential impacts on views from (and to) the Cotswolds National Landscape. This should include views from the Cotswold Way National Trail (for example, from the hill fort above North Stoke (GR: ST70716891) and from Hanging Hill (ST71257017)), from the Monarch's Way trail in the vicinity of Upton Cheyney and from the minor road between Upton Cheyney and Wick, which runs along the boundary of the National Landscape. It may also be appropriate to assess potential impacts on the tranquillity and dark skies of the Cotswolds National Landscape.

Further information / guidance on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.

⁸ <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

Building Block 3 (Growth around our market towns)

The Cotswolds Conservation Board's interest in 'Building Block 3' primarily relates to Chipping Sodbury. This is because of Chipping Sodbury's close proximity to the Cotswolds National Landscape (CNL). For example, the River Frome, which marks the eastern edge of Chipping Sodbury, is approximately 1.4km from the National Landscape boundary and approximately 1.9km from elevated viewpoints on the Cotswold Way National Trail on the Cotswold escarpment.

As such, Chipping Sodbury is located within the setting of the Cotswolds National Landscape. Large scale, new development beyond the settlement boundary of Yate could also potentially be within the setting of the Cotswolds National Landscape, particularly any new development to the south of the train line on the southern boundary of Yate.

Further information on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.

With regards to potential visual impacts, key viewpoints to consider are outlined below.

Views from the Cotswolds National Landscape

Key viewpoints within the Cotswolds National Landscape looking towards Chipping Sodbury (and Yate) include views from:

- The Cotswold Way National Trail.
- The Cotswold Way Circular Walk 11.⁹
- Footpaths on Old Sodbury Hillfort scheduled monument (including the Cotswold Way), although those views might be blocked by the trees on the western boundary – would also need to consider impacts on the setting of this scheduled monument.
- The grounds of the Grade II* listed building of the Parish Church of St John the Baptist (which the Cotswold Way passes through), which is marked as a viewpoint on Ordnance Survey maps – would also need to consider impacts on the setting of this listed building.
- The access land on the Cotswold escarpment between Old Sodbury Hillfort and St John the Baptist church.
- Important views identified in relevant Neighbourhood Development Plans.

Views towards the Cotswolds National Landscape

Key viewpoints outside the Cotswolds National Landscape, looking towards it, would include views from:

- Named footpaths, including Monarch's Way, Frome Valley Walkway and Jubilee Way.
- The access land / common land to the north east and south east of Chipping Sodbury.
- Listed buildings – would also need to consider impacts on the settings of these listed buildings.
- Important views identified in relevant Neighbourhood Development Plans.

⁹ https://www.nationaltrail.co.uk/en_GB/short-routes/cotswold-way-circular-walk-11-old-sodbury-hillfort-and-church/

BUILDING BLOCK 4 (rural villages and settlements)

The consultation document identifies that 22% of South Gloucestershire lies within the Cotswolds National Landscape. In addition, a substantial area would be located within the setting of the Cotswolds National Landscape, visible from the Cotswold escarpment and High Wold Dip Slope (Landscape Character Types 2¹⁰ and 9¹¹, respectively, in the Cotswolds AONB Landscape Character Assessment).

We recognise that the Cotswolds National Landscape is a living and working landscape in which the social and economic well-being of local communities are important considerations. Maintaining vibrant and thriving local communities is essential to the long-term future of the National Landscape. As such, the National Landscape cannot be considered exempt from the need for new housing and other development. Indeed, the right development in the right place can potentially play a positive role in helping to conserve and enhance the natural beauty of the National Landscape.

However, development within the Cotswolds National Landscape and its setting should be delivered in a way that is compatible with – and positively contributes to - the statutory purpose of conserving and enhancing the natural beauty of the area. To not do so would undermine:

- the statutory purpose of designation;¹²
- the principle that safeguarding AONBs is in the national interest;¹³
- the aspirations and goals of the Government's 25 Year Environment Plan;¹⁴
- the proposals of the Government-commissioned Landscapes Review;¹⁵
- the vision, outcomes, ambitions and policies of the Cotswolds AONB Management Plan;¹⁶
- the Government's assertions that:
 - meeting housing need is never a reason to cause unacceptable harm to protected landscapes;¹⁷
 - protected land will be just that – our Areas of Outstanding Natural Beauty will be protected as the places, views and landscapes we cherish most and passed on to the next generation.¹⁸

National planning policy and guidance helps to address this issue by making it clear that:

- the scale and extent of development in Areas of Outstanding Natural Beauty (AONBs) should be limited;¹⁹

¹⁰ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-2-escarpment-2016.pdf>

¹¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

¹² [Countryside and Rights of Way Act 2000 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2000/12/section-1)

¹³ [Areas of Outstanding Natural Beauty: technical support scheme \(England\) 2019 to 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/areas-of-outstanding-natural-beauty-technical-support-scheme-england-2019-to-2020.pdf)

¹⁴ [25-year-environment-plan.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/25-year-environment-plan.pdf)

¹⁵ [DEFRA - Landscapes Review - Final Report 2019 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/defra-landscapes-review-final-report-2019.pdf)

¹⁶ [Management-Plan-2018-23.pdf \(cotswoldsaonb.org.uk\)](https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/02/Management-Plan-2018-23.pdf)

¹⁷ [Government response to the local housing need proposals in "Changes to the current planning system" - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system.pdf)

¹⁸ [Radical and necessary reforms to our planning system will get Britain building \(telegraph.co.uk\)](https://www.telegraph.co.uk/news/ukpol/2018/07/13/radical-and-necessary-reforms-to-our-planning-system-will-get-britain-building/)

¹⁹ [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/424242/national-planning-policy-framework.pdf). Paragraph 172.

- there is a presumption that planning permission should be refused for major development in AONBs;²⁰
- policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing and other development in full;²¹
- AONBs are unlikely to be suitable areas for accommodating unmet needs arising from adjoining, non-designated, areas.²²

Further comments on potential development in the Cotswolds National Landscape and its setting are provided in relation to Building Block 3, above, and in response to Questions 14 and 15 below. Please also refer to our response to Questions 5, 15 and 15, in particular.

BUILDING BLOCK 5 (large scale free standing new settlements)

Large scale free-standing settlements would not be appropriate in the Cotswolds National Landscape. Such settlements would not be compatible with the requirement, in paragraph 172 of the NPPF, for the scale and extent of development in protected landscapes to be limited.

Such settlements are also likely to be inappropriate in the setting of the Cotswolds National Landscape, particularly in close proximity to the boundary of the National Landscape. This is because of the potential impacts of such settlements on views from and to the Cotswolds National Landscape and because of potential impacts on the tranquillity and dark skies of the National Landscape.

For large scale free standing new settlements these impacts could potentially be experienced many kilometres away.

Further guidance on these issues is provided in the following Position Statements published by the Board:

- Development in the Setting of the Cotswolds AONB;²³
- Tranquillity;²⁴
- Dark Skies & Artificial Light.²⁵

Further information on development in the setting of the Cotswolds National Landscape is provided in our response to Question 16.

Question 8: Strategy- Where will development go?

Do you agree with the initial guiding principles?

√ Yes

²⁰ [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Paragraph 172.

²¹ [Natural environment - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Paragraph 041.

²² [Natural environment - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Paragraph 041.

²³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

²⁴ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

²⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf> and it's appendices A ([link](#)), B ([link](#)) and C ([link](#)).

- No
 Don't know

Question 9: Strategy- Where will development go?

Do you think we have missed any key, initial guiding principles?

The Cotswolds Conservation Board broadly agrees with the initial guiding principles identified in the consultation document. In particular, we are pleased to see explicit reference to protecting and enhancing landscape designations and their settings. However, we are disappointed that the consultation document does not explicitly advocate a landscape-led approach to development in the Cotswolds National Landscape and its setting as a guiding principle.

We recommend that South Gloucestershire Council should explicitly include this landscape-led approach as a guiding principle in the Local Plan.

Further information on this landscape-led approach is provided in response to Question 5.

Question 10: Urban Lifestyles

Do you agree with our Urban Lifestyles approach to investigate further change and growth in our urban areas?

- Yes
 No
 Don't know

Question 11: Urban Lifestyles

Do you have any comments on the Urban Lifestyle approach to investigate further growth and change in our urban areas?

Please refer to our comments on 'Building Block 1', in response to Question 7.

Question 12: Urban Lifestyles

Do you agree the areas where the Urban Lifestyles approach should be investigated?

- Yes
 No
 Don't know

Question 13: Urban Lifestyles

Do you have any comments on individual locations we have set out, or other locations which should be investigated for an urban lifestyles approach for further growth and change in our urban areas?

East Fringe

The Cotswolds Conservation Board supports the role of the Local Plan in '*creating, as a lasting legacy, a network of green routes that provide benefits to health, wellbeing and recreation, nature-recovery and water-management and quality, by enhancing access to, and the quality of, open spaces and parks, and increases connections and views to key recreational, ecological and landscape features in the adjoining countryside*'.

In particular, as stated in the consultation document, the Bristol to Bath railway path provides excellent walking, cycling, and green-infrastructure connectivity to Bath and Bristol city centres. Promoting and enhancing the Bristol to Bath railway path as a viable commuter and leisure route for cyclists between Bristol (particularly the eastern fringe) and Bath could potentially help to reduce traffic through Cotswolds National Landscape, for example, along the A431.

Question 14: Creating Sustainable Rural Villages and Settlements

Do you agree with our proposed approach to the national policy issues highlighted, like flood risk, the Cotswolds Area of Outstanding Natural Beauty, Green Belt, and other planning considerations and issues?

- Yes
 No
 Don't know

Question 15: Creating Sustainable Rural Villages and Settlements

Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?

Overall, the Cotswolds Conservation Board agrees with the proposed approach. Specific comments and recommendations are provided below.

Over-arching principles for development in the Cotswolds National Landscape and its setting

In response to Question 7 (specifically, 'building blocks' 3 and 4), above, we set out some key principles relating to development in the Cotswolds National Landscape and its setting. The additional comments that we provide in response to Question 15 are supplementary to - and should be considered in the context of - those key principles.

Climate Change Mitigation and Adaptation / Sustainable Travel

The Cotswolds Conservation Board agrees with the first three principles / bullet points set out on page 115 of the consultation document, with regards to reducing the impacts of climate change:

- focusing rural growth in locations that aren't completely dependent on private car use to access key services and facilities;

- maximising opportunities for development in locations that have good walking, cycling or public transport and digital connections to access key services and facilities;
- exploring opportunities that contribute to achieving key plan priorities around the creation of nature recovery and green infrastructure networks.

Similarly, we acknowledge the issues relating to sustainable travel for access to services and facilities, as outlined on pages 123 and 124 of the consultation document.

However, with regards to the last bullet point on page 115 (biodiversity offsetting and renewable energy generation we would like to make the following points):

- **Biodiversity offsetting:** The phrase ‘offsetting’ does not convey the extent to which development should contribute to halting and reversing declines in biodiversity. Nor does it convey the ‘net-gain’ requirements that will soon be enshrined in legislation. The priority should be to conserve and enhance (and void harm to) the existing biodiversity resource, particularly with regards to international and national nature conservation designations. Where development *is* permitted, there should be a requirement to deliver a significant net-gain in biodiversity.
- **Renewable energy:** In principle, we support the provision of renewable energy generation as a key mechanism for mitigating the impacts of climate change. However, within the Cotswolds National Landscape and its setting, such provision should, in principle, be of a type and scale that is compatible with the statutory purpose of conserving and enhancing the natural beauty of the National Landscape.

Affordable housing and local amenities and services

We are pleased to see the reference to affordable housing (on page 116) and to supporting / enhancing key services and facilities in rural communities (on page 117). Policy CE12 of the Cotswolds AONB Management Plan identifies these as priorities for development in the Cotswolds National Landscape.

The provision of housing that is affordable in perpetuity (for example, social rented housing) is particularly important within the Cotswolds National Landscape. This is because other forms of so-called affordable housing are likely to be beyond the means of many of those who have a local connection and are most in need of genuinely affordable housing.

When assessing housing provision for settlements in the Cotswolds National Landscape, a key consideration should be the affordable housing need (i.e. quantity and type) identified in rural Housing Needs Surveys (HNS) for the specific settlement / parish.

For settlements within the Cotswolds National Landscape where there is not an up-to-date HNS (i.e. within the last five years) we urge South Gloucestershire Council to schedule these in during preparation of the local plan. This is particularly important for those settlements that are higher up the settlement hierarchy (and therefore more likely to be a focal point for plan-led development) and / or where it is known that there

is developer interest. This would include settlements such as Marshfield, Tormarton, Acton Turville and Hawkesbury Upton.

Affordable housing needs identified in an up-to-date Neighbourhood Development Plan should also be a key consideration.

We recommend that South Gloucestershire Council should make use of the provision that allows them to demand on-site affordable housing contributions on all sites, including development of five homes or fewer, in protected landscapes.²⁶ This reflects one of the recommendations of the Government-commissioned Landscapes Review Final Report.

We also recommend that South Gloucestershire Council should seek 50% affordable housing on market-led housing developments in the Cotswolds National Landscape, in line with best practice in protected landscapes.

Plan-led v speculative development

The Board supports the principle of a 'plan-led' approach. This approach should help to reduce the risk of potentially inappropriate / harmful, speculative development proposals.

Rural exception sites / housing development beyond the settlement boundary

We recommend that, in the Cotswolds National Landscape at least, the rural exception sites (RES) policy should require 100% affordable housing as the starting point, with 75% being the absolute minimum (where viability assessments show that 100% affordable housing is not viable). Such sites should also be 'small', as specified in the NPPF. These requirements will help to ensure that RES sites deliver what they are supposed to in a way that is compatible with the AONB designation and with national and local AONB policy. This reflects best practice in protected landscapes.

Any other development outside of settlement boundaries, within the Cotswolds National Landscape, should be based on robust evidence of local need arising within the National Landscape (as per Policy CE12 of the Cotswolds AONB Management Plan 2018-2023). As outlined above, a key consideration should be the affordable housing need identified for the specific settlement / parish in an up-to-date rural Housing Needs Survey (HNS). Any such development should, ideally, be contiguous with the existing settlement.

Proportionate and 'appropriate' growth

We support the principle of planned growth being proportionate to the size and scale of the existing rural communities, particularly in the Cotswolds National Landscape. Ensuring that new development is proportionate is one of the recommendations of the Cotswolds AONB Landscape Strategy and Guidelines for each landscape character type.²⁷

Paragraph 71 and footnote 33 of the NPPF provide a useful definition of 'proportionate' in the context of housing developments. For example, paragraph 71 states that 'entry-level

²⁶ NPPF. Paragraph 63.

²⁷ For example, this issue is addressed in Section 9.1 of the landscape strategy and guidelines for Landscape Character Type 9 – High Wold Dip Slope ([link](#)).

exception sites' should be proportionate in size to the existing settlements and footnote 33 clarifies that proportionate means that the site should not exceed 5% of the size of the existing settlement. The Board recognises that entry-level exception sites should not be permitted in AONBs. However, we consider that, in principle, this definition of 'proportionate' is an appropriate one to use for housing developments in the Cotswolds National Landscape.²⁸

Development in the Cotswolds National Landscape and its setting should be sensitively located and designed. This should including being consistent with the Cotswolds AONB Landscape Strategy and Guidelines.

Large scale growth in rural communities

Please refer to our comments on 'Building Block 5' in response to Question 7.

Access to superfast broadband

We recognise the important role that access to superfast broadband increasingly plays in meeting people's needs and the opportunity that it provides for working at home and holding meetings remotely, thereby reducing the need to travel.

Within the Cotswolds National Landscape and its setting, the provision of broadband infrastructure should be located and designed in such a way that any adverse impacts on the natural beauty of the National Landscape are minimised.

Cotswolds Area of Outstanding Natural Beauty / National Landscape

We are pleased to see that the Cotswolds AONB (or Cotswolds National Landscape, as it is now branded) is identified as a key planning designation and consideration.

We acknowledge all of the issues raised in the consultation document (pages 129-130) relating to the Cotswolds National Landscape. Our position on these issues is covered elsewhere in this consultation response (including in response to Question 15).

Other key designations and considerations

Green Belt

The Board does not have a position on 'Green Belt', per se, although we acknowledge the role that Green Belt plays in, for example, safeguarding the countryside from encroachment and in preserving the setting and special character of historic towns.²⁹

The NPPF (paragraph 126) clarifies that Green Belt boundaries should only be altered where exceptional circumstances are fully evidences and justified. It is important to note that 'exceptional circumstances' also apply to major development³⁰ in the

²⁸ Another useful reference point, in this regard, is the major development assessment that the South Downs National Park Authority undertook in 2015 for potential housing allocations in the South Downs Local Plan ([link](#)). This assessment identified two allocations that would 'clearly be major' development in terms of their scale. The increase in the number of dwellings associated with these two allocations was 5.6% and 7.5%.

²⁹ As per paragraph 134 of the NPPF.

³⁰ In the context of paragraph 172 and footnote 55 of the NPPF.

Cotswolds National Landscape. Therefore, the Cotswolds National Landscape (outside the Green Belt) should not necessarily be considered to be a more suitable location for such development than the Green Belt.

As such, we do not consider it to be appropriate to only investigate the potential for an appropriate level of small to medium-scale growth in villages and settlements outside the Green Belt (i.e. Green Belt Option 1). In this scenario eight out of the 23 available settlements (35%) would be in the Cotswolds National Landscape. In contrast, in Option 2, 13 out of 59 available settlements would be in the Cotswolds National Landscape (i.e. only 22%). As such, Option 1 would also put disproportionate pressure on a small number of settlements in the National Landscape.

Therefore, our preferred Green Belt option would be Option 2.

A number of settlements are located in both the Cotswolds National Landscape and in the Green Belt. The level of protection afforded to both of these designations means that development in these settlements will require a particularly high level of scrutiny.

Question 16: Creating Sustainable Rural Villages and Settlements

Are there any other planning issues you think we should consider?

LANDSCAPE-LED APPROACH TO DEVELOPMENT IN THE COTSWOLDS NATIONAL LANDSCAPE AND ITS SETTING

As outlined in response to Question 5, we recommend that the South Gloucestershire Local Plan should advocate a landscape-led approach to development in the Cotswolds National Landscape and its setting. Key aspects of this landscape-led approach are outlined below.

Landscape and Visual Sensitivity and Capacity Study

We recognise that the Housing and Economic Land Availability Assessment (HELAA) is a key mechanism for identifying potential site allocations. We strongly recommend that, as an integral part of the HELAA process, South Gloucestershire Council should undertake a Landscape and Visual Sensitivity and Capacity Study (LVSCA). A LVSCA should also be a key component in identifying 'suitable areas' for renewable energy, particularly wind and solar energy.

Undertaking a LVSCA is particularly important in the Cotswolds National Landscape and its setting, given the great weight that should be given to conserving and enhancing the landscape and scenic beauty of this area.

When assessing landscape sensitivity, sites within the Cotswolds National Landscape should be accorded the highest 'value'.³¹ As such, sites within the National Landscape are likely to have a higher landscape sensitivity than sites within equivalent landscape character areas outside the National Landscape.

³¹ Landscape Institute and Institute of Environmental Management (2013) *Guidelines for Landscape and Visual Impact Assessment*. Paragraph 5.47: Landscape that are nationally designated [including AONBs] will be accorded the highest value in the assessment.

Where such studies identify that the sensitivity of the landscape to specific types and scales of development is high, or medium-high (and where any development impacts could not be fully mitigated), the development should be deemed to exceed the capacity of the landscape to accommodate that development.³² In such cases, the site should not be allocated, except in exceptional circumstances. Within the Cotswolds National Landscape, such sites should be deemed to be major development (see ‘Major Development’ below).

Where the identified landscape sensitivity is below these thresholds, assessments should be made of the specific quantum of development that could theoretically be accommodated on these sites, based on appropriate assumptions (for example, assumptions relating to design, density, layout, mitigation measures, etc.).

Major development in the Cotswolds National Landscape

We strongly recommend that South Gloucestershire Council should undertake an assessment of potential site allocations to see if they constitute ‘major development’ in the context of paragraph 172 and Footnote 55 of the NPPF.

We acknowledge paragraph 172 of the NPPF addresses the issue of major development in the context of planning permissions (i.e. as part of the development management process). However, legal opinion has stated that *‘it would arguably amount to an error of law to fail to consider [major development] at the site allocations stage of plan making ... The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF.’*³³

The ‘*Assessment of Site Allocations Against Major Development Considerations*’ undertaken by the South Downs National Park Authority in 2015³⁴ and 2017³⁵ as part of their Local Plan process is an excellent case study in this regard. In addition, the Board’s draft Planning & Development Position Statement (Appendix 7) provides a checklist of major development considerations.

In line with paragraph 172 of the NPPF, there should be a presumption against allocating sites that would constitute major development. Such sites should only be allocated if exceptional circumstances apply and if it can be demonstrated that the development would be in the public interest. The assessment of major development status should include the three ‘tests’ specified in paragraph 172 of the NPPF.

It is important to note that exceptional need does not necessarily equate to exceptional circumstances for a particular development. This is because, as stated in relevant case law *‘there may be alternative sites that are more suitable because development there*

³² This approach is applied in the South Downs National Park, as outlined in paragraph 4.19 of the Landscape Background Paper ([link](#)) for the South Downs Local Plan: ‘A site assessed as having high landscape sensitivity, or medium-high landscape sensitivity where any development impact could not be fully mitigated, were generally found unsuitable for housing development’. A relevant example for the Cotswolds National Landscape would be the ‘*Cotswolds (Wychavon) AONB and Environs – Landscape and visual sensitivity study*’ ([link](#)), which forms part of the evidence base for the South Worcestershire Development Plan.

³³ [Core-11-Major-Development-Advice-2017.pdf \(southdowns.gov.uk\)](#)

³⁴ [SDNP-Major-Sites-Assessment-Report.pdf \(southdowns.gov.uk\)](#)

³⁵ [Microsoft Word - 171002SDNPMajorSitesAssessmentFINAL \(southdowns.gov.uk\)](#)

would result in less harm to the AONB landscape’.³⁶ Relevant case law also states that ‘no permission should be given for major development save to the extent the development was needed in the public interest, met a need that could not be addressed elsewhere or in some other way and met that need in a way that to the extent possible, moderated detrimental effect on the environment, landscape and recreational opportunities’.³⁷

When weighing up the public benefit of a proposed allocation or development, it should be borne in mind that AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation’s interest to safeguard them.³⁸

It is worth noting that proposed allocations / developments / sites don’t have to be strategic in scale in order to be considered major development in this context. Relatively small allocations / developments / sites could potentially constitute major development, depending on the factors such as the sensitivity of the particular location.

Development in the setting of the Cotswolds National Landscape

Principles

Relevant case law has established that great weight should be given to the impact of a proposed development in the setting of the Cotswolds National Landscape on views from the National Landscape.³⁹

The views from the Cotswold escarpment are one of the ‘special qualities’ of the Cotswolds National Landscape and one of the ‘key features’ of the Escarpment Landscape Character Type (LCT).⁴⁰ Long distance views across neighbouring lowlands is also one of the key features of The same is true of the High Wold Dip Slope LCT.⁴¹

The ‘great weight’ that applies to impacts on views *from* the Cotswolds National Landscape does not apply to views *to* the National Landscape. However, these views can still be an important material consideration. For example, the views to the Cotswold escarpment are one of the special qualities of the Cotswolds National Landscape. In addition, the South Gloucestershire Landscape Character Assessment recognises that the Cotswold Scarp forms a significant backcloth / backdrop / skyline to views looking east from Landscape Character Areas 5 (Wickwar Ridge and Vale)⁴² and 6 (Pucklechurch Ridge and Boyd Valley)⁴³.

Any development within the setting of the Cotswolds National Landscape should be sensitively located and designed to avoid adverse impacts on the National Landscape.⁴⁴

Other relevant considerations for development in the setting of the Cotswolds National Landscape include potential impacts on the tranquillity and / or dark skies of the National

³⁶ R (Mevagissey Parish Council) v Cornwall Council [2013] EWHC 3684 (Admin) ([link](#)), paragraph 52.

³⁷ R (Advearse) v Dorset Council v Hallam Land Management Ltd [2020] EWHC 807 ([link](#)), paragraph 35.

³⁸ [Areas of Outstanding Natural Beauty: technical support scheme \(England\) 2019 to 2020 - GOV.UK \(www.gov.uk\)](#)

³⁹ Stroud District Council v Secretary of State for Communities and Local Government [2015] EWHC 488 (Admin)

⁴⁰ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-2-escarpment-2016.pdf>

⁴¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

⁴² <https://www.southglos.gov.uk/documents/LCA-Section-2-Area-5.pdf>

⁴³ <https://www.southglos.gov.uk/documents/LCA-Section-2-Area-6.pdf>

⁴⁴ The Government has introduced this requirement into the draft NPPF which is currently out for consultation ([link](#) – paragraph 175), which, in turn, is based on current Planning Practice Guidance on development in the setting of protected landscapes ([link](#) – paragraph 041).

Landscape (for example, as a result of increase traffic movements, noise or light pollution).

Further guidance on development in the setting of the Cotswolds National Landscape is provided in the Board's Position Statement on 'Development in the Setting of the Cotswolds AONB'.⁴⁵

Relevant settlements

A number of settlements overlap with the boundary of the Cotswolds National Landscape or lie directly adjacent to it. These include (from north to south) Horton, Old Sodbury, Hinton, Doynton and Wick.

A number of additional settlements could also be classed as being in the setting of the Cotswolds National Landscape (depending, to some degree, on the scale of any proposed allocations or development. These include (from north to south):

- Chipping Sodbury (also see our comments on 'Building Block 3', in response to Question 7);
- Yate (also see our comments on 'Building Block 3', in response to Question 7);
- Pucklechurch;
- Siston;
- Bridgegate;
- Oldland;
- Potential eastern expansion of 'east fringe' beyond the A4175 (also see our comments on 'Building Block 5', in response to Question 7);
- Bitton.

Therefore, the principles outlined above should apply when allocations, suitable areas for renewable energy or other development are being considered in these locations.

Question 17: Policies

Do you agree with the range and scope of policies we are proposing to include in our new Local Plan?

- Yes
 No
 Don't know

Question 18: Policies

Do you have any comments on the range and scope of policies we are proposing?

The range and scope of the policies being proposed appears to be appropriate. However, we have comments to make on a couple of specific issues.

⁴⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

Landscape-led approach to development in the Cotswolds National Landscape and its setting

We acknowledge that the consultation document proposes that the Local Plan will include a non-strategic policy on 'Protecting Our Landscapes'. However, as outlined in response Question 5, we recommend that one of the priorities for the Local Plan should be to take a landscape-led approach to development in the Cotswolds National Landscape and its setting. As such, we recommend that there should be a strategic policy specifically to address this issue.

Nature Recovery Networks

We acknowledge that the consultation document proposes that the Local Plan will include a non-strategic policy on 'Designated Biodiversity Sites & Protecting and Enhancing Biodiversity'. However, the proposed policies do not appear to explicitly address the issue of nature recovery networks.

Nature recovery networks are likely to become one of the main Local Plan-based mechanisms for halting and reversing ongoing declines in biodiversity. As such, we consider that nature recovery networks merit a strategic policy specifically to address this issue.

Question 19: Appendix 2: Draft policies:

Climate Change and Mitigation

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 20: Appendix 2: Draft policies:

Climate Change and Mitigation

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the policy aspiration for development proposals to demonstrate how they will mitigate and adapt to climate change and help deliver radical reductions in greenhouse gas emissions and generate renewable and / or low carbon energy proportionate to their scale and type.

The Board published the 'Climate Change Strategy for the Cotswolds Area of Outstanding Natural Beauty' in 2012.⁴⁶ Many of the principles and measures outlined in the Climate Change Strategy have been integrated into Policies CC7 and CC8 of the Cotswolds AONB Management Plan 2018-2023. The Board is currently reviewing the Climate Change Strategy, with a view to adopting an updated version in June 2021.

⁴⁶ [Climate-Change-Strategy-adopted-June-2012.pdf \(cotswoldsaonb.org.uk\)](#)

We recommend that South Gloucestershire Council should have regard to this Climate Change Strategy when developing its climate change and mitigation policy (and related policies).

The draft policy does not currently identify thresholds for what would constitute an appropriate or acceptable contribution to the three criteria specified in the policy. This potentially makes it easy for developers to secure planning permission for developments that do not make as great a contribution as they could or should do.

The policy and / or the supporting text could potentially identify specific thresholds such as those required in the proposed Future Homes Standard or reflecting best practice such as BREEAM.

It would be useful if the policy could also be applied to the retrofitting of existing development as well to new development.

Our comments relating specifically to renewable energy are covered in our response to the 'Renewable and Low Carbon Energy System' policy.

Question 21: Appendix 2: Draft policies:

Energy Management in New Development

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 22: Appendix 2: Draft policies:

Energy Management in New Development

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the policy aspiration to increase energy efficiency and deliver net zero carbon in new development.

It is important that the policy addresses 'unregulated energy use' (i.e. Policy Option 2) as this can account for 50% of total energy use.⁴⁷

We support the sequential approach advocated in the draft policy, in which the first consideration is the extent to which the demand for heating, cooling, etc., can be minimised.

The policy indicates that development should be Certified Passivhaus (or equivalent) or meet the subsequent criteria. However, these subsequent criteria do not set thresholds to show what would constitute an appropriate or acceptable contribution to the criteria specified in the policy

It would be useful if the policy could also be applied to the retrofitting of existing development as well to new development.

Within the Cotswolds National Landscape and its setting, care will need to be taken to ensure that energy management measures are compatible with the purpose of AONB designation and with the locally distinctive and historic character of settlements within the AONB. In 2014, the Board published guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds National Landscape.⁴⁸

We recommend that South Gloucestershire Council should have regard to this publication when developing its 'Energy Management' policy.

Question 23: Appendix 2: Draft policies:

Renewable and Low Carbon Energy System

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 24: Appendix 2: Draft policies:

Renewable and Low Carbon Energy System

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the generation of energy from renewables or low carbon sources, particularly where such development contributes directly to meeting the needs of communities within the Cotswolds National Landscape.

Within the Cotswolds National Landscape and its setting, care will need to be taken to ensure that such development is compatible with the statutory purpose of conserving and enhancing the natural beauty of the National Landscape.

We support the identification of 'suitable areas' for renewable energy development. This process should include a Landscape and Visual Sensitivity and Capacity Assessment (LVSCA), as outlined in response to Question 16. In addition, it should identify additional key constraints and have a buffer zone around these. Relevant constraints would include scheduled monuments, international and national nature conservation designations, access land and common land, roads and public rights of way.

The principles outlined in response to Question 16, regarding major development and development in the setting of the Cotswolds National Landscape, and in response to Question 5, regarding a landscape-led approach to development in the Cotswolds National Landscape and its setting, should also apply.

⁴⁸ [Energy-Guide-June-2014.pdf \(cotswoldsaonb.org.uk\)](#)

The Board has published a Renewable Energy Position Statement.⁴⁹ It is likely that this position statement will be reviewed and updated following the review of the Board's Climate Change Strategy. However, for the time being, the current version remains the Board's position. So, for example, at present, we recommend that, in the Cotswolds National Landscape, wind turbines should not exceed 25m in height (to the tip of the blade).

The policy and supporting text should make explicit reference to constraints that apply in the Cotswolds National Landscape and other relevant constraints.

It is important to note that renewable energy is not the only option for offsetting the carbon emissions that will still be produced by new development. Alternative options that might be more appropriate in the context of the Cotswolds National Landscape include tree planting (where this is consistent with landscape character) and increasing the organic content of soils.

Question 25: Appendix 2: Draft policies:

Creating well-designed places

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 26: Appendix 2: Draft policies:

Creating well-designed places

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the requirement for development proposals to contribute to the distinctiveness and identity of the area.

Several of the 'special qualities' of the Cotswolds National Landscape are particularly relevant to this policy:

- 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, high architectural quality and integrity.

As 'special qualities' of the Cotswolds National Landscapes, these are key attributes on which the priorities for the area's conservation, enhancement and management should be based. The importance of these special qualities should be reflected in the policy.

Policy CE3 of the Cotswolds AONB Management Plan 2018-2023 sets out policies on 'local distinctiveness'. The Board's publication on 'Local Distinctiveness and

⁴⁹ [COTSWOLDS CONSERVATION BOARD POSITION STATEMENT \(cotswoldsaonb.org.uk\)](https://www.cotswoldsaonb.org.uk)

Landscape Change' explores how the built environment contributes to the distinctive character of the National Landscape.⁵⁰ In addition, the Cotswolds AONB Landscape Strategy and Guidelines provides guidance on issues relating to the design of new development.⁵¹

We recommend that the 'Creating well-designed places' policy should require development within the Cotswolds National Landscape to be consistent with – and make a positive contribution to - these special qualities, polices and guidance.

Question 27: Appendix 2: Draft policies:

Parking requirements

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 28: Appendix 2: Draft policies:

Parking requirements

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the provision of charging points for electric and 'ultra-low' vehicles. This reflects one of the aspirations of Policy CC7 (Climate Change – Mitigation) of the Cotswolds AONB Management Plan 2018-2023.

Within the Cotswolds National Landscape, the provision of parking and charging points should be compatible with the purpose of designation.

Question 29: Appendix 2: Draft policies:

NSIPs and Related Development

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 30: Appendix 2: Draft policies:

NSIPs and Related Development

Do you think there are any other issues we should consider in this policy?

In principle, the Cotswolds Conservation Board supports the proposed policy approach to NSIPs and related development.

Policy CE11 of the Cotswolds AONB Management Plan 2018-2023 states that:

⁵⁰ [Local Distinctiveness and Landscape Change - Cotswolds AONB](#)

⁵¹ [Landscape Strategy & Guidelines - Cotswolds AONB](#)

- Any major development proposed in the Cotswolds AONB, including major infrastructure projects, should be 'landscape-led'. Whereby it demonstrably contributes to conserving and enhancing the natural beauty of the Cotswold AONB and, where appropriate, to the understanding and enjoyment of its special qualities. This should include fully respecting and integrating the special qualities of the AONB into the planning, design, implementation and management of the development, from the very beginning of the development's inception.

The vision, design principles and objectives for the A417 'missing link' set out a landscape-led approach to this NSIP project. The design principles include the principle that the scheme '*must have substantially more benefits than negative impacts for the Cotswolds AONB*'.

We recommend that these policies and principles should be incorporated into the 'NSIPs and Related Development' policy.

Question 31: Appendix 2: Draft policies:

Nuclear New Build

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 32: Appendix 2: Draft policies:

Nuclear New Build

Do you think there are any other issues we should consider in this policy?

No comment.

Question 33: Appendix 2: Draft policies:

Oldbury A Station – Decommissioning

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 34: Appendix 2: Draft policies:

Oldbury A Station – Decommissioning

Do you think there are any other issues we should consider in this policy?

No comment.

Question 35: Appendix 2: Draft policies:

Radioactive Waste

Do you agree with our proposed policy approach?

- Yes
 No
 Don't know

Question 34: Appendix 2: Draft policies:

Radioactive Waste

Do you think there are any other issues we should consider in this policy?

No comment.

Thank you for your participation.

PART THREE – RETURNING YOUR COMMENTS

Please return completed forms by 11:59pm 1 March 2021. Following this date, no further comments will be considered.

By email:

Policy.consultation@southglos.gov.uk

By post

Strategic Planning Policy and Specialist Advice Team,
South Gloucestershire Council,
Environment and Community Services Department,
PO Box 1954,
Bristol,
BS37 ODD

Viewing documents

The consultation documents are available to view on the Council's website at <http://www.southglos.gov.uk,LocalPlan2020> and online at South Gloucestershire Libraries (please refer to www.southglos.gov.uk/libraries for locations and opening times).

Due to Covid-19 and the current national lockdown this consultation will be entirely digital for the early part of December. We will be keeping this situation under close review and will advise if things change.