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## CONSULTATION RESPONSES

**Q9 – Housing Mix and Type:** Do you agree that the Local Plan should seek to address these issues? If not, what is your alternative? Are there any particular approaches that we should consider?

The Cotswolds Conservation Board agrees that the Local Plan should seek to address these issues. The Board’s approach to housing, in the context of the Cotswolds National Landscape and its setting is detailed in the Board’s Housing Position Statement.<sup>1</sup>

**Q10 – Strategic Design Principles:** Do you agree that the strategic design principles above should inform directions/locations for growth? If not, why not?

The Cotswolds Conservation Board agrees that the outlined strategic design principles outlined in the consultation document should inform directions / locations for growth.

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<sup>1</sup> Cotswolds Conservation Board (2021) *Housing Position Statement* ([link 1](#) (main document) and [link 2](#) (appendices)).

However, design shouldn't just be about informing directions / locations for growth. It should also be about informing the quality and sustainability of development. For example, design principles should ensure that development reflects the locally distinctive character of the area and should incorporate measures to: (i) mitigate and adapt to climate change; and (ii) halt and reverse declines in biodiversity.

In the context of development in the Cotswolds National Landscape and its setting, Local Plan design principles and policies should have regard to the policies of the Cotswolds AONB Management Plan 2018-2023<sup>2</sup> and relevant guidance and position statements<sup>3</sup> published by the Board, including:

- Cotswolds AONB Landscape Character Assessment;<sup>4</sup>
- Cotswolds AONB Landscape Strategy & Guidelines;<sup>5</sup>
- Cotswolds AONB Local Distinctiveness and Landscape Change.<sup>6</sup>

Local Plan design principles and policies should also have regard to the Government's Planning Practice Guidance with regards to development in Areas of Outstanding Natural Beauty and their settings.<sup>7</sup>

**Q11 – Design Connectivity:** Do you agree with the emphasis on connectivity? If not, why not?

The Cotswolds Conservation Board agrees that connectivity is an important consideration with regards to the design of new development.

In particular, design that prioritises opportunities for active and sustainable travel helps to reduce dependency on car use. This, in turn, helps to mitigate the impacts of climate change. The '20 Minute Neighbourhood' concept<sup>8</sup> may be a useful reference point in this regard.

Reducing the need to travel should be at the top of any travel / connectivity hierarchy. A key priority, in this regard, is to ensure that new development, particularly housing, has high quality broadband provision. For example, high quality broadband provision would facilitate home working and reduce the need to commute to work.

We would question whether connectivity should be an over-riding consideration. For example, other aspects of design also play an important role in mitigating and adapting to the impacts of climate change, including 'passive' building design,<sup>9</sup> insulation, etc.<sup>10</sup>

**Q12 – Reduce reliance on private vehicles:** Do you agree that the Local Plan should seek to explore ways in which the reliance on the private vehicle may be reduced? If not, why not?

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<sup>2</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)).

<sup>3</sup> <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

<sup>4</sup> Cotswolds Conservation Board (2004) *Cotswolds AONB Landscape Character Assessment* ([link](#)).

<sup>5</sup> Cotswolds Conservation Board (2016) *Cotswolds AONB Landscape Strategy & Guidelines* ([link](#)), particularly with regards to the design-related guidance for development in the relevant Landscape Character Types.

<sup>6</sup> Cotswolds Conservation Board (2003) *Cotswolds AONB Local Distinctiveness & Landscape Change* ([link](#)), particularly with regards to Chapters 4 and 5.

<sup>7</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraphs 041 and 042.

<sup>8</sup> <https://www.tcpa.org.uk/the-20-minute-neighbourhood>

<sup>9</sup> [https://www.designingbuildings.co.uk/wiki/Passive\\_building\\_design](https://www.designingbuildings.co.uk/wiki/Passive_building_design)

<sup>10</sup> [https://www.c40knowledgehub.org/s/article/Reducing-climate-change-impacts-on-new-buildings?language=en\\_US](https://www.c40knowledgehub.org/s/article/Reducing-climate-change-impacts-on-new-buildings?language=en_US).

The Cotswolds Conservation Board strongly agrees with this aspiration. This aspiration is explicitly advocated in the Cotswolds AONB Management Plan.<sup>11</sup>

Even when all private vehicles are electric, there will still be issues associated with congestion and road safety. In addition, electric vehicles will still require electricity to be generated. This electricity generation will potentially have adverse environmental impacts, as would the sourcing of component parts for the electric vehicles

**Q13 - Enhancing connectivity and prioritising active and sustainable travel:** Do you agree that enhancing connectivity and prioritising active and sustainable travel are the best ways to achieve this? Please explain your answer.

The Cotswolds Conservation Board agree that enhancing connectivity and prioritising active and sustainable travel is one of the best ways to achieve this (i.e. to reduce reliance on private vehicles). However, another priority in achieving this would be to ensure that new development, particularly housing, is located close to (i.e. walking or cycling distance from) local services and amenities. In other words, housing developments should be targeted towards settlements that are higher up the settlement hierarchy.

**Q14 - Any additional transport issues or priorities:** Are there any additional transport issues or priorities you think that the Local Plan should address? Please explain your answer.

The Cotswolds Consideration Board recommends that consideration should be given to the extent to which proposed developments would increase traffic movements on local roads (for example, the percentage increase in (i) HGVs and (ii) other vehicles).

This is a particularly important consideration in the Cotswolds National Landscape and its setting, where increases in traffic movements could adversely affect the tranquillity of the area. As a 'rule of thumb' increases in traffic movements of 10% or more should be considered significant in these locations. This issue is addressed in the Board's Tranquillity Position Statement.<sup>12</sup>

**Q15 – Electric vehicle infrastructure:** Do you agree that the Local Plan should seek to improve infrastructure, such as charging points, for electric vehicles and e-bikes? Please explain your answer.

The Cotswolds Conservation Board agrees that the Local Plan should seek to improve infrastructure for electric vehicles and e-bikes.

The Cotswolds AONB Management Plan 2018-2023 advocates the provision of a network of charging points for electric cars.<sup>13</sup>

**Q16. Any other ways to increase uptake of electric and other low-emission vehicles:** Are there any other ways you think the Local Plan could encourage the increased uptake of electric and other low-emission vehicles? Please explain your answer.

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<sup>11</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CC7 (Climate Change – Mitigation).

<sup>12</sup> Cotswolds Conservation Board (2019) *Tranquillity Position Statement* ([link](#)). Section 4.5 of the Position Statement is particularly relevant with regard to traffic movements.

<sup>13</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CC7 (Climate Change – Mitigation).

The Cotswolds Conservation Board recommends that charging points should be a standard feature of new development, including housing, employment and retail developments where car and / or bicycle parking would be provided. The retrospective fitting of charging points should also be encouraged.

**Q26 – Energy Hierarchy:** Do you agree that the Local Plan should encourage the use of the ‘energy hierarchy’ in developments, aiming to reduce the use of energy in the first instance wherever possible? If not, what approach do you suggest?

The Cotswolds Conservation Board agrees that the Local Plan should encourage the use of the ‘energy hierarchy’ in developments. This is an essential component of mitigating the impacts of climate change.

The top of the hierarchy (i.e. reduce the need for energy) should, in the context of new development, explicitly include energy conservation. This should include measures such as passive design and improved building insulation. This is separate from the second step in the hierarchy, energy efficiency, which is more about using technology that requires less energy to perform the same function.

In principle, the Board supports the provision of renewable energy schemes. Where appropriate, renewable energy provision should be delivered on-site. Within the Cotswolds National Landscape and its setting, renewable energy schemes should, ideally, be delivered in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the area.

Careful consideration should therefore be given to the suitability of the Cotswolds National Landscape and its setting for renewable energy schemes, including wind and solar energy. This should take account of both the landscape sensitivity<sup>14</sup> and relevant constraints such as nature conservation designations, historic environment assets and public rights of way.

Consideration should also be given to alternative options for delivering the required greenhouse gas mitigation / offset. This should include consideration of measures such as increasing the organic content of soils and / or planting deciduous trees / woodland that is native to the local area (where this is compatible with the local landscape character).

The Board is currently reviewing and updating its Climate Change Strategy<sup>15</sup> and will be reviewing and updating its Renewable Energy Position Statement<sup>16</sup> later this year. The Board’s new Landscape-Led Development Position Statement also briefly addresses the issue of the climate emergency and renewable energy.<sup>17</sup> The Local Plan should have regard to these documents.

**Q29 – Compensatory measures and enhancements:** Do you agree that development should provide compensatory measures / enhancements to compensate for their impacts (including biodiversity offsetting/ landscape restoration)? Are there any other matters that should be considered?

The Cotswolds Conservation Board agrees that development should provide compensatory measures / enhancement to compensate for their impacts.

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<sup>14</sup> The Stratford-on-Avon District Renewable Energy Landscape Sensitivity Study ([link](#)) provides a good example of this approach.

<sup>15</sup> Cotswolds Conservation Board (2012) *Climate Change Strategy for the Cotswolds Area of Outstanding Natural Beauty* ([link](#)).

<sup>16</sup> Cotswolds Conservation Board (2014) *Renewable Energy Position Statement* ([link](#)).

<sup>17</sup> Cotswolds Conservation Board (2021) Landscape-led Development Position Statement ([link 1](#) (main document) and [link 2](#) (appendices)).

However, compensatory measures should be considered in the context of the ‘mitigation hierarchy’, in which adverse impacts are:

1. **Avoided** (for example, through the selection of appropriate sites for development).
2. **Minimised** (for example, through implementing appropriate on-site measures).
3. **Compensated** where adverse impacts / losses that cannot be avoided or minimised.

As such, compensation is a ‘last resort’ that is used to address adverse impacts that cannot be avoided or

Compensation and enhancement are two different things. ‘Enhancement’, in the context of landscape and visual amenity, the, states that enhancement ‘*means proposals that seek to improve the landscape resource and the visual amenity of the proposed development site and its wider setting, over and above its baseline condition*’.<sup>18</sup> As such, enhancement can (and should) be addressed even if adverse impacts have been avoided and / or minimised. In addition, enhancement involves implementing improvements that are over and above the baseline condition whereas compensation measures might not necessarily require this baseline to be exceeded. Also, based on the definition, enhancements should be delivered either on site or within the wider setting of the site, whereas compensation can potentially delivered further afield.

The Government’s 25 Year Environment Plan states that an ‘environmental net gain’ principle will be embedded for development, including housing and infrastructure. The requirement to deliver biodiversity net-gain is currently being embedded into legislation. However the 25 Year Environment Plan states that this approach will be expanded to include wider natural capital / environmental benefits.<sup>19</sup>

In the context of the Cotswolds National Landscape, ‘relevant authorities’ have a statutory duty to have regard to the statutory purpose of conserving and enhancing the natural beauty of areas of outstanding natural beauty.<sup>20</sup> The expectation of this ‘duty of regard’ is that adverse impacts will be avoided and minimised.

**Q30 - Protection and enhancement of green areas and associated habitat/biodiversity:** Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?

The Cotswolds Conservation Board agrees that the protection and enhancement of our green areas and associated habitat / biodiversity should be a priority for the Local Plan.

However, we consider that the Local Plan’s aspirations with regards to biodiversity should be much more visionary and much more consistent.

In terms of consistency, the Summary of the consultation document states that ‘Increasing biodiversity’ will be one of four over-arching principles that will sit at the heart of the South Warwickshire Local Plan (as reflected in the ‘Vision’ in Section 5.1). However, the consultation document fails to identify biodiversity as a ‘key strategic issue’ in its own right. Nor does it identify ‘increasing biodiversity’ as a strategic objective in its own right (Section 5.2). Biodiversity should be a key strand through all levels of the Local Plan.

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<sup>18</sup> Landscape Institute and Institute of Environmental Management & Assessment) (2013) *Guidelines for Landscape and Visual Impact Assessment* (GLVIA). Paragraph 4.35

<sup>19</sup> HM Government (2018) *A Green Future: Our 25 Year Plan to Improve Environment* ([link](#)).

<sup>20</sup> <https://www.legislation.gov.uk/ukpga/2000/37/section/85>

We are in the midst of an ecological emergency which has seen rapid declines in biodiversity at international, national and local levels. This will not be adequately addressed by *'improvements to the green space network through tree planting and other biodiversity initiatives'*.

To address this ecological emergency in a more comprehensive way, the Local Plan's strategic-level focus should be on nature recovery, providing a clear link with the emerging nature recovery strategies. This strategic-level approach should focus on delivering:<sup>21</sup>

- **Better** protection and management of the existing biodiversity resource.
- **Bigger** wildlife sites (i.e. increasing the size of existing sites).
- **More** wildlife sites.
- **Joined** wildlife sites (i.e. increased connectivity through, for example, the provision of a 'permeable' landscape and 'stepping stone' sites).

In terms of the existing biodiversity resource, the Local Plan should recognise the important role that Local Wildlife Sites play, both in their own right and as a key component of nature recovery networks.

We recognise the need for wildlife-rich green spaces close to where people live. In some cases, these green spaces may form part of the wider nature recovery network. However, the nature recovery network will require will require landscape scale habitat enhancement and creation. Depending on the habitats and species involved, it might not be appropriate for some of this nature recovery work to be delivered close to where people live.

As such, although nature recovery and the provision of wildlife-rich green spaces near to where people live overlap to some degree, they should not be treated as one and the same thing.

**Q31 - Green space on large-scale developments:** Do you agree that wherever possible and practical, large-scale developments should also deliver substantive areas of green space (such as country parks etc.)? If not, what is your alternative?

The Cotswolds Conservation Board agrees that, wherever possible and practical, large-scale developments should also deliver substantive areas of green space.

With regards to enhancing biodiversity, the best outcomes will be delivered where large areas of priority habitat are established and / or enhanced (and managed in the long term). A requirement for large-scale development to deliver substantive areas of green space would help to deliver this aspiration.

However, measures to enhance biodiversity should also be integrated into the built development itself (for example, through the use of 'swift bricks' in new houses and through appropriate sustainable drainage measures), not just as a stand-alone area of green space.

**Q32 - Tree planting:** Is tree planting an important issue that the Local Plan should seek to encourage? How should the Local Plan achieve this?

The Cotswolds Conservation Board agrees that tree planting is an important issue and, in principle, should be encouraged. This is because tree planting has the potential to help address both the climate emergency and the ecological emergency.

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<sup>21</sup> These principles are adapted from the 'Lawton Report' (Making Space for Nature) and are reflected in Policy CE7 (Biodiversity) of the Cotswolds AONB Management Plan 2018-2023.

However, tree planting should be delivered on the basis of the right tree in the right place. For example:

- the trees selected should be species that are native to that locality and of local provenance;
- any tree planting should be consistent with – and positively contribute to – the local landscape character.

This second point is particularly important in the Cotswolds National Landscape and its setting, where great weight should be given to conserving and enhancing landscape and scenic beauty.

**Q33 – Climate Change:** Do you agree with the proposed ways in which the Local Plan should tackle climate change? What other ways can the Local Plan help us achieve Net Zero Carbon?

The Cotswolds Conservation Board agrees with the proposed ways in which the Local Plan should tackle climate change.

We have addressed the issue of:

- **Increasing accessibility and reducing the need to travel by private car** – in our response to Questions 10, 11, 12 and 13.
- **Improving efficiency** – in our response to Question 26.
- **Renewable energy** – in our response to Question 26.
- **Mitigating biodiversity loss** – in our response to Questions 29 and 30.

In terms of improving energy efficiency and achieving ‘net zero’, we would encourage the South Warwickshire Local Plan to advocate best practice in relation to these issues, not just compliance with Government or legal requirements.

Further information on the Board’s position on the issue of climate change is provided in our response to Question 26.

**Q45 – Four overarching principles:** Do you agree that the four overarching principles will deliver the South Warwickshire you want? If not, what changes would you like to see?

In principle, the Cotswolds Conservation Board agrees with the four overarching principles.

However, whilst we agree with the overarching principles, we are concerned by the Vision’s over-riding focus on boosting and diversifying the local economy and on meeting development needs.

For example, the four overarching principles are identified as the means by which the boosting and diversifying of the local economy will be achieved, rather than as principles in their own right. As such, they come across as being subservient to boosting and diversifying the local economy and to meeting development needs.

Whilst the economic and development need aspirations merit inclusion in the Local Plan’s Vision, they should not necessarily be over-riding considerations.

As stated in the National Planning Policy Framework (NPPF), the purpose of the planning system is to contribute to the achievement of sustainable development.<sup>22</sup> Achieving sustainable development

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<sup>22</sup> Ministry of Communities, Housing and Local Government (2019) *National Planning Policy Framework* (NPPF) ([link](#)). Paragraph 7.

means that the planning system has three overarching objectives – economic, social and environmental – which are interdependent and need to be pursued in mutually supportive ways.

The NPPF also identifies circumstances in which it might not be appropriate to meet locally identified needs in full and where the application of relevant NPPF policies may provide a clear reason for refusing a proposed development.<sup>23</sup>

With regards to Areas of Outstanding Natural Beauty (AONBs), specifically, the NPPF specifies that the scale and extent of development should be limited<sup>24</sup> and the Government's Planning Practice Guidance states that the NPPF's policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs in full.<sup>25</sup> Furthermore, the Government has recently stated that:

- the Government's standard method for calculating housing need does not present a target; and
- meeting housing needs is never a reason to cause unacceptable harm to protected landscapes (or, for that matter, to Green Belt).<sup>26</sup>

Based on the points outlined above, we recommend that the four 'overarching principles' should merit inclusion in the Vision in their own right and not as means by which the economic aspirations for the area would be delivered. Furthermore, we recommend that there should be at least one additional over-arching principle, which is to:

- Conserve and enhance South Warwickshire's natural, cultural, historic and landscape assets.

**Q41 – Strategic Objectives:** Do you agree that these should be the strategic objectives for the Local Plan? Are there any others?

The Cotswolds Conservation Board broadly supports the strategic objectives, subject to the following provisos.

Given the ecological emergency that we are currently facing at an international, national and local level, the issue of nature recovery / biodiversity merits inclusion as a strategic objective in its own right. Including this topic as a strategic objective in its own right would also be consistent with having 'improving biodiversity' as an overarching principle.

The objective to protect and enhance our historic and environmental assets shouldn't just relate to our most important assets. This could be interpreted as meaning just our internationally and / or nationally significant assets. However, as outlined in response to Question 30 (in the context of Local Wildlife Sites), locally important assets also play a vitally important role. Therefore, we recommend that the words 'most important' should be removed.

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<sup>23</sup> NPPF, paragraph 11 and footnote 6. The relevant NPPF policies include those relating to habitat sites, Sites of Special Scientific Interest, Green Belt, Local Green Spaces, Areas of Outstanding Natural Beauty, irreplaceable habitats, designated heritage assets and areas at risk of flooding.

<sup>24</sup> NPPF, paragraph 172.

<sup>25</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

<sup>26</sup> <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>. The standard method figure doesn't take into account potential constraints so the housing requirement figure (which does take into account constraints) could potentially be less.



The national importance of the Cotswolds National Landscape and its geographical extent (covering approximately 8% of the Plan area) means that it merits explicit reference in the strategic objective relating to the protection and enhancement of historic and environmental assets.

**Q48 - Favourite growth option:** What is your favourite Growth Option and what do you particularly like about this option?

In principle, the Cotswolds Conservation Board would support growth options that prioritise growth close to transport hubs, employment opportunities and local services and amenities. As such, in theory, our preferred growth options would be a combination of Growth Options A (Rail Corridors), B (Main Bus Corridors), D (Enterprise Hubs) and E (Socio Economic).

In this context, it is worth noting that, in principle, the Board supports the reopening of the Stratford-on-Avon rail line, including the opening of a new train station at Long Marston, which is particularly relevant to Growth Option A.

However, Growth Options A, B and D would all potentially result in large amounts of development in the vicinity of Long Marston and Quinton. These locations are in close proximity to – and in the setting of – the Cotswolds National Landscape. For example, much of this area is visible from the Public Rights of Way (PROW) on Meon Hill, within the National Landscape, and development in the area could potentially result in increases in traffic movements on roads in and adjacent to the Cotswolds National Landscape.

When considering development options in this area, the local authorities should:

- have regard:
  - the purpose of AONB designation, which is to conserve and enhance the natural beauty of the area (with the expectation that adverse impacts on the Cotswolds National Landscape will be avoided and minimised);
  - the Government’s Planning Practice Guidance, with regards to development in the setting of AONBs;<sup>27</sup>
  - Cotswolds AONB Management Plan 2018-2023;<sup>28</sup>
  - Cotswolds AONB Landscape Character Assessment,<sup>29</sup> particularly with regards to Landscape Character Types (LCTs) 1 (Escarment Outliers) and 19 (Unwooded Vale);
  - Cotswolds AONB Landscape Strategy & Guidelines,<sup>30</sup> particularly with regards to LCTs 1<sup>31</sup> and 19<sup>32</sup>;
  - the Board’s Position Statement on ‘Development in the Setting of the Cotswolds AONB’.<sup>33</sup>
- give great weight to conserving the landscape and scenic beauty of the Cotswolds National Landscape, including the impact of development outside the National Landscape on views from the National Landscape.

In order to address these issues, we recommend that development outside the Cotswolds National Landscape in the Long Marston / Quinton area should not contribute to the coalescence of:

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<sup>27</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

<sup>28</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)).

<sup>29</sup> Cotswolds Conservation Board (2004) *Cotswolds AONB Landscape Character Assessment* ([link](#)).

<sup>30</sup> Cotswolds Conservation Board (2016) *Cotswolds AONB Landscape Strategy & Guidelines* ([link](#)).

<sup>31</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-1-escarpment-outliers-2016.pdf>

<sup>32</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-19-unwooded-vale-june-2016.pdf>

<sup>33</sup> Cotswolds Conservation Board (2016) *Development in the Setting of the Cotswolds AONB Position Statement* ([link](#)).

- Lower Quinton and Upper Quinton;
- Lower Quinton and Meon Vale / Quinton Rail Technology Centre; and
- Upper Quinton and Meon Vale / Quinton Rail Technology Centre;

In effect, development (other than that which is already committed) should not take place:

- between Tailor's Lane and Main Road (Lower Quinton), outside of the built up area boundaries of Lower Quinton and Upper Quinton;
- west of the current extent of built development in Lower Quinton and Upper Quinton;
- east of the B4632, particularly south of Main Road (Lower Quinton);
- west of the B4632, south of the junction with Tailor's Lane.

Development pressure in this area could also affect Upper Quinton, which is located within the National Landscape.

Upper Quinton currently forms part of Quinton 'Local Service Village' (LSV). As such, this hamlet would potentially be required to accommodate some of the LSV housing provision specified in the Stratford-on-Avon Core Strategy.

We acknowledge that Upper Quinton is relatively close to the services and facilities provided in Lower Quinton. However:

- the Government's Planning Practice Guidance states that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*';<sup>34</sup>
- the Cotswolds AONB Management Plan states that '*development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB*'.<sup>35</sup>

On this basis, we consider that housing provision in Upper Quinton should be based on needs arising within the settlement (or within the section of the Cotswolds National Landscape within Stratford-on-Avon District), rather than on needs relating to Lower Quinton (which is outside of the National Landscape) or the wider area. As such, we recommend that Upper Quinton should not be included in the Quinton LSV. We also recommend that development should not be permitted outside the built up area boundary of Upper Quinton, other than in exceptional circumstances.

**Q49 - Least favourite growth option:** What is your least favourite Growth Option and what do you particularly not like about this option?

The Cotswolds Conservation Board considers Growth Options C (Main Roads) and G (Dispersed) to be the least favourite growth options.

Growth Option C would continue – and potentially exacerbate - the dependence on private car use. This would not be compatible with the need to mitigate the impacts of climate change. Even when all cars are electric, there would still be issues relating to congestion and road safety. Furthermore, the electricity generation required to charge the vehicles is likely to have some adverse impacts.

Growth Option G would result in an increased level of development within the Cotswolds National Landscape and its setting. The Board recognises that the provision of new housing is an integral component of maintaining thriving communities within the National Landscape. However, as outlined above, this housing provision should be based on needs arising within the National Landscape,

<sup>34</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

<sup>35</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)). Policy CE12 (Development Priorities and Evidence of Need).

particularly with regards to affordable housing (for example, as identified for a Rural Housing Needs Survey), rather than meeting the wider needs of South Warwickshire or any unmet needs from neighbouring urban areas.

Growth Option G would also lead to an increase in private car use and would not be consistent with the principle of locating new development close to existing services and amenities (i.e. the principle of the settlement hierarchy).