

**WILTSHIRE LOCAL PLAN CONSULTATION  
COTSWOLDS CONSERVATION BOARD COMMENTS  
9 MARCH 2021**



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**EMERGING SPATIAL STRATEGY (COTSWOLDS CONSERVATION BOARD COMMENTS)**

**Introduction**

Paragraph 1.1 and Footnote 1

Paragraph 1.1 states that ‘forecasts predict Wiltshire will need between 40,840 and 45,630 new homes over the plan period of 2016 to 2036’. Footnote 1 clarifies that 40,840 homes is the minimum required by Government using its current standard method.

We acknowledge that the government’s ‘standard method’ is the starting point for identifying housing need in a local authority area. However, we are very concerned about the potential conflation of ‘housing need’ and ‘housing requirement’. Paragraph 1.1 (and, to some degree, the rest of the consultation document) creates the impression that the housing need figure identified through the standard method 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:<sup>1</sup>

- *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.*

This clarification reflects the Government’s guidance on Housing and Economic Land Availability Assessment.<sup>2</sup> 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:

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<sup>1</sup> [Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

<sup>2</sup> [Housing and economic land availability assessment - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

- 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:<sup>3</sup>

- 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.

These considerations are particularly important in a local authority area like Wiltshire, where approximately 44% of the area is located in AONBs<sup>4</sup>, with an additional substantial area being located within the setting of these AONBs. They are also important considerations with regards to the large area of Green Belt that extends from Trowbridge and Corsham (i.e. the Western Wiltshire Green Belt).

Before assuming that the housing provision in Wiltshire will match (or exceed) the housing need figure identified through the standard method, Wiltshire Council should first identify whether this housing need figure is actually achievable, taking into account relevant constraints.

### **Growth and Climate Change**

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023<sup>5</sup> and in the Board's Climate Change Strategy<sup>6</sup>.

In principle, the Cotswolds Conservation Board supports the aim to focus growth on the main settlements as a means of helping to address climate change (for the reasons outlined in the 'Climate Change outcomes' box on page 4 of the consultation document).

In principle, we also support growth in rural settlements to meet local needs, especially with regards to affordable housing and local services.

Please see our comments below, relating to 'Delivering the Spatial Strategy' for further relevant information.

### **Delivering the Spatial Strategy**

In principle, the Cotswolds Conservation Board supports the 'Delivery Principles' outlined on page 6 of the consultation document.

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<sup>3</sup> [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk). Paragraph 041.

<sup>4</sup> There are three AONBs that overlap with Wiltshire – the Cotswolds National Landscape, Cranborne Chase AONB and North Wessex Downs AONB.

<sup>5</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

<sup>6</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

However, given that 44% of Wiltshire is located in AONBs (with a significant additional area being located within the setting of the AONBs), we recommend that the Delivery Principles should also set out delivery principles for development in the AONBs and their settings.

- Development in the AONBs and their settings should be compatible with and, ideally, make a positive contribution to conserving and enhancing the natural beauty of the AONBs.
- Development in the AONBs, particularly housing, should be based on robust evidence of needs arising within the AONBs.<sup>7</sup>

If these principles are not applied, this would undermine:

- the statutory purpose of designation;
- the principle that safeguarding Areas of Outstanding Natural Beauty (AONBs) is in the national interest;
- the aspirations and goals of the Government's 25 Year Environment Plan;<sup>8</sup>
- the proposals of the Government-commissioned Landscapes Review Final Report;<sup>9</sup>
- the vision, outcomes, ambitions and policies of the Cotswolds AONB Management Plan;<sup>10</sup>
- efforts to restore and enhance the natural beauty of the Cotswolds National Landscape;
- the Government's assertions that: (i) meeting housing need is never a clear reason to cause unacceptable harm to protected landscapes;<sup>11</sup> and (ii) our Areas of Outstanding Natural Beauty (AONBs) will be protected as the places, views and landscapes we cherish most and passed on to the next generation.<sup>12</sup>

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

- great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs, which, together with National Parks and the Broads, have the highest status of protection in relation to these issues;<sup>13</sup>
- the scale and extent of development in AONBs should be limited;<sup>14</sup>
- planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest;<sup>15</sup>

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<sup>7</sup> This reflects Policy CE12 (Development Priorities and Evidence of Need) in the Cotswolds AONB Management Plan 2018-2023.

<sup>8</sup> The Government's 25 Year Environment Plan ([link](#)) aspires for us to be the first generation to leave the environment in a better state than we found it. As part of this aspiration, it proposes to embed an 'environmental net gain' principle for development. In addition, it sets a goal that '*we will conserve and enhance the beauty of our natural environment ... by ... safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage*'.

<sup>9</sup> The 'Landscapes Review Final Report' ([link](#)) sets out 27 proposals relating to our protected landscapes, including stronger purposes in law for our 'national landscapes' (proposal 23) and for AONBs to be strengthened with new purposes, powers and resources (proposal 24).

<sup>10</sup> Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* ([link](#)).

<sup>11</sup> Government response to the local housing need proposals in 'Changes to the current planning system' – updated 16 December 2020 ([link](#)).

<sup>12</sup> Statement by the Secretary of State for Housing, Communities and Local Government, when launching the consultation on the Planning White Paper in August 2020 ([link](#)).

<sup>13</sup> National Planning Policy Framework (NPPF) ([link](#)): paragraph 172.

<sup>14</sup> NPPF ([link](#)): paragraph 172. See also Appendix 9 of the Cotswolds AONB Management Plan 2018-2023.

<sup>15</sup> NPPF: paragraph 172 ([link](#)).

- policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for housing and other development in full;<sup>16</sup>
- AONBs are unlikely to be suitable areas for accommodating unmet needs arising from adjoining, non-designated areas.<sup>17</sup>

## **Formulating the Spatial Strategy**

### Paragraph 2.17, page 7 (Housing Need)

Please refer to our comment on paragraph 1.1 of the consultation document, relating to housing need.

## **Emerging Spatial Strategy**

### Brownfield Land

In principle, we support the priority given to re-developing brownfield land as this helps to reduce the extent to which greenfield land needs to be developed.

However, some brownfield sites have a high biodiversity value, particularly with regards to rare invertebrate species and the priority habitat ‘open mosaic habitat on previously developed land’. Care should be taken to ensure that this biodiversity resource is conserved and enhanced.

Care should also be taken with the redevelopment of decommissioned airfields in the AONBs and their settings. In the Cotswolds National Landscape, such airfields are one of the key features of Landscape Character Type (LCT) 9 (High Wold Dip Slope). Colerne Airfield is one such example. The Cotswolds AONB Landscape Strategy & Guidelines for LCT 9 states that:

- *In view of the brownfield status of decommissioned airfields, they are particularly susceptible to proposals for new large-scale development that has the potential to have a widespread impact on landscape character and visual amenity over large areas of the surrounding landscape. Such sites may offer some capacity for development, however, due to the established use of existing development, but nevertheless require careful site planning and mitigation.*<sup>18</sup>

Section 9.5 of that document provides guidelines on how to avoid and minimise adverse impacts associated with re-using decommissioned airfields, including for residential, industrial and solar farm uses. Any relevant allocations and / or development proposals should be compatible with these guidelines.<sup>19</sup>

## **Housing Market Areas**

### Development at settlements within the setting of AONBs

None of the principal settlements or market towns in are located in the three AONBs that overlap with Wiltshire. However, many of them are located within the setting of the AONBS (as outlined below, in relation to the Cotswolds National Landscape).

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<sup>16</sup> Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

<sup>17</sup> Planning Practice Guidance – Natural Environment: paragraph 41 ([link](#)).

<sup>18</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

<sup>19</sup> As specified in Policy CE10 of the Cotswolds AONB Management Plan 2018-2023 ([link](#)).

Guidance on development in the setting of AONBs is provided in:

- the Board’s Position Statement on ‘Development in the Setting of the Cotswolds AONB’;<sup>20</sup> and
- the Government’s Planning Practice Guidance on development in the setting of protected landscapes.<sup>21</sup>

In particular, when considering potential allocations or development proposals in the setting of the AONBs, it is important to consider potential impacts of the proposed development on the AONBs, including impacts on:

- views from and to the AONBs;<sup>22</sup>
- the tranquillity of the AONBs – noise / increase in traffic levels (inc. significance of 10%+ increase in traffic levels);<sup>23</sup>
- the dark skies of the AONBs – light pollution / introduction of lit elements into dark landscapes;<sup>24</sup>
- the landscape character of land adjoining AONBs, where this landscape character is complementary to that of the AONB.

Relevant case law has clarified that great weight should be given to the impact of development outside an AONB on views from the AONB.<sup>25</sup> This great weight does not apply to impacts on views from outside an AONB looking towards the AONB. However, other factors, such as important views identified in a Neighbourhood Development Plan, might increase the weight given to such views.

The dark skies and tranquillity of the AONBs are also two of the AONB ‘special qualities’ (for the Cotswolds National Landscape, at least). Whilst important considerations in their own right, they are also an integral part of the landscape character of an area. As such, impacts on the dark skies and tranquillity of the AONBs should also be given great weight.

The main settlements in the setting of the Cotswolds National Landscape and important considerations relating to these settlements are outlined below:<sup>26</sup>

- Chippenham Housing Market Area:
  - **Corsham:** The built environment of Corsham currently extends to within approximately 600m of the Cotswolds National Landscape boundary; the main road through Corsham (the A4) continue through the National Landscape towards Bath.
  - **Chippenham:** The built environment of Chippenham currently extends to within approximately 2.7km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposals to the west of the

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<sup>20</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>

<sup>21</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 042.

<sup>22</sup> See also Policy CE1 (Landscape) of the Cotswolds AONB Management Plan 2018-2023 which specifies that development proposals should ensure that views - including those into and out of the AONB – are conversed and enhanced.

<sup>23</sup> See also Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Tranquillity Position Statement ([link](#)).

<sup>24</sup> See also Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 and the Board’s Dark Skies & Artificial Light Position Statement ([link](#)) and its appendices A ([link](#)), B ([link](#)) and C ([link](#)).

<sup>25</sup> Stroud District Council v Secretary of State for Communities and Local Government v Gladman Developments Limited [2015] EWHC 488 (Admin) ([link](#))

<sup>26</sup> Similar considerations will need to be taken into account with regards to settlements in the setting of the other two AONBs.

- A350; two of the main road in Chippenham (the A4 and the A420) continuing through the National Landscape towards Bath and Bristol, respectively.
- **Malmesbury:** The built environment of Malmesbury is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.<sup>27</sup>
  - Trowbridge Housing Market Area:
    - **Bradford on Avon:** The built environment of Bradford on Avon is directly adjacent to the Cotswolds National Landscape boundary; the statement in the Government's Planning Practice Guidance that AONBs '*are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*' will be particularly relevant here.<sup>28</sup>
    - **Trowbridge:** The built environment of Trowbridge currently extends to within approximately 2.4km of the Cotswolds National Landscape boundary – this could potentially be an issue for any new large development proposal to the north-west of Trowbridge.

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<sup>27</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

<sup>28</sup> <https://www.gov.uk/guidance/natural-environment#landscape>. Paragraph 041.

## EMPOWERING LOCAL COMMUNITIES (COTSWOLDS CONSERVATION BOARD COMMENTS)

### Affordable Homes

**Q. Do you agree there should be a target of 40% affordable homes on all new schemes of more than five dwellings in the rural area? What other approaches might there be?**

The Cotswolds Conservation Board acknowledges that a target of 40% affordable homes is an improvement on the 30% target that is currently required in some parts of Wiltshire. However, in the AONBs, we would encourage Wiltshire Council to consider setting a target of 50% affordable homes.

We also acknowledge that the proposal to apply this target to all new schemes of more than five dwellings is more stringent than in some local authority areas. However, the National Planning Policy Framework (NPPF) allows for the provision of affordable housing for schemes of five units or fewer. In the AONBs, we would encourage Wiltshire Council to consider applying this target to schemes of two or more units.

Combining these two elements together, for housing developments in the AONBs we would encourage Wiltshire Council to consider setting a target of 50% affordable housing on all new schemes of two or more dwellings. This reflects best practice in development plans that relate to other protected landscapes, such as the Arnside & Silverdale AONB Development Plan Document (DPD).<sup>29</sup>

The natural beauty of AONBs means that they are desirable places to live. This contributes to elevated house prices compared to surrounding non-designated areas. These elevated house prices mean that housing in the AONBs is even more out of the reach of those most in need of affordable housing.

This is particularly important given that many of the jobs that are essential to conserving and enhancing the natural beauty of AONBs – and to furthering the economic and social wellbeing of local communities within AONBs - are relatively low paid. These workers, especially young people, are being priced out of the housing market in the landscapes and communities that depend on them.

Having a higher percentage of affordable housing for all scales of development in AONBs also reflects Policy CE12 of the Cotswolds AONB Management Plan 2018-2023, which prioritises affordable housing. It also reflects the Government's 'vision' for national parks which specifies that '*the expectation is that new housing will be focussed on meeting affordable housing requirements*'.<sup>30</sup>

Having a higher percentage of affordable housing, where this affordable housing primarily meets local needs, would also help to limit the scale and extent of development in the AONBs, as required in paragraph 127 of the NPPF.

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<sup>29</sup> <https://www.lancaster.gov.uk/planning/planning-policy/arnside-and-silverdale-aonb-dpd>. Policy AS03 – Housing Provision.

<sup>30</sup> Defra (2010). *English National Parks and the Broads. UK Government Vision and Circular 2010* (link). N.B. Although this document relates to National Parks and the Broads – not AONBs – the Board takes the view that the extracted text is relevant to all protected landscapes. This is because National Parks and AONBs both have the highest status of protection in the NPPF. Also, the NPPF and PPG now explicitly state that the scale and extent of development in AONBs should be limited.

## **Rural Exception Sites and Community-Led Housing**

### **Q. Do you agree with the approach set out in the suggested revised Core Policy 44? If not, why not? How could it be improved?**

The Cotswolds Conservation Board supports the criteria specified for rural exception sites as these criteria reflects most of the principles that the Board advocates for such sites.

We are pleased to see that the policy sets a maximum of 25% market housing on rural exception sites. This should help to avoid the scenario that has arisen in other parts of the Cotswolds National Landscape where such sites have provided up to 49% market housing, which we consider to be completely inappropriate.

It would be helpful if the policy explicitly stated that the starting point, when considering such sites, should be 100% affordable. This would help to reinforce the primary purpose of such sites.

We are also pleased to see the criteria relating to the size of rural exception sites (i.e. 20 dwellings or fewer and no greater than 5% of the size of the settlement) – we consider this to be an appropriate interpretation of the requirement for such sites to be ‘small’.

It would be helpful if this requirement was expanded to state:

- (i) 20 dwellings or fewer and (ii) no greater than 5% of the size of the settlement or no greater than 5% of the number of dwellings in the settlement, whichever is less.

This will help to set a limit on the number of dwellings, in addition to the limit on the size of the scheme.

## **Housing Requirements for Neighbourhood Area Designations in the Rural Area**

### **Q: What do you think to the housing requirements for Local Service Centres and Large Villages? Should requirements be higher or lower? If so which ones and why?**

The Cotswolds Conservation Board considers that the four bullet points, which set out the way in which housing requirements for Local Service Centres and Large Villages, will be met are appropriate.

We also support the general presumption against housing proposals outside a settlement.

We acknowledge that some level of housing development may be appropriate in AONB settlements. However, we are concerned that the methodology for identifying housing provision in each settlement does not adequately address the specific circumstances of the individual location (such as landscape character and visual sensitivity). In addition, the 100m buffer that has been used does not adequately address issues such as views (both to and from settlements) that extend beyond this 100m buffer.

When considering potential site allocations for settlements in the AONBs and their settings, we recommend that a Landscape and Visual Sensitivity and Capacity Study should be undertaken, with sites / land parcels that are identified as having a high or medium-high sensitivity being ruled out.

For potential allocations for settlements within the AONBs, we recommend that:



- potential impacts on the factors<sup>31</sup> that contribute to the natural beauty of the AONBs should be assessed;
- the allocations should be assessed to see if they constitute major development, in the context of paragraph 172 of the NPPF, particularly allocations of 10 or more dwellings - potential allocations that are considered to be major development should be ruled out.<sup>32</sup>

Further advice on these recommendations is provided in the Board's draft Planning & Development Position Statement, which Wiltshire Council has been consulted on.

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<sup>31</sup> In addition to landscape quality and scenic quality, these factors also include tranquillity (including dark skies), natural heritage (including biodiversity) and cultural heritage (including historic environment).

<sup>32</sup> Such allocations should only be considered if Wiltshire Council is satisfied that (i) there are exceptional circumstances, and (ii) it is demonstrated that, despite giving great weight to conserving the landscape and scenic beauty in the AONB, the development is in the public interest,

## **ADDRESSING CLIMATE CHANGE AND BIODIVERSITY NET GAIN (COTSWOLDS CONSERVATION BOARD COMMENTS)**

### **Context**

The Cotswolds Conservation Board acknowledges the climate change emergency and the need to mitigate and adapt to climate change. The need to address climate change is reflected in the Cotswolds AONB Management Plan 2018-2023<sup>33</sup> and in the Board's Climate Change Strategy<sup>34</sup>.

### **Policy Theme 1 – Tackling Flood Risk and Promoting Sustainable Water Management**

The Board supports the measures proposed to address this issue.

### **Policy Theme 2 – Enhancing Green/ Blue Infrastructure (GBI) and biodiversity**

In principle, the Board supports the measures proposed to address this issue.

However, we do not consider that the proposed measures (or the document as a whole) goes far enough to address the ongoing, massive declines in biodiversity at a global, national and local level. Addressing biodiversity loss requires a comprehensive set of measures, of which delivering biodiversity net-gain is just one component.

One of the most important measures is for existing wildlife sites to be protected, in line with national policy and guidance, and for these sites to be brought into good condition through effective and appropriate management. In principle, development should not impact on international, national and, ideally, local nature conservation designations. The biodiversity net-gain mechanism should not be used in a way that allows for development to harm these designations.

A key omission from the consultation document is any reference to Local Nature Recovery Strategies (LNRS). LNRS will soon be one of the key mechanisms for helping to halt and reverse declines in biodiversity at the local level. Development should be required to make a positive contribution to LNRS.

### **Policy Theme 3 – Sustainable Design and Construction in the Built Environment**

The Board supports measures to reduce greenhouse gas emissions from new development (and, retrospectively, from existing development).

The main focus should be on reducing greenhouse gas emissions at source, rather than relying on offset mechanisms such as off-site renewable energy schemes.

Within the AONBs and their settings, such measures should, ideally, be implemented in a way that is compatible with – and positively contributes to – the purpose of AONB designation. For example, such measures should be sensitive to the local distinctiveness of the built environment.

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<sup>33</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>. Particularly Policies CC7 (Climate Change – Mitigation) and CC8 (Climate Change – Adaptation).

<sup>34</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2020/02/Climate-Change-Strategy-adopted-June-2012.pdf>

The Board's guidance for householders on energy efficiency and generation measures suitable for traditionally constructed buildings in the Cotswolds AONB is a good example of this approach.<sup>35</sup>

#### **Policy Theme 4 – Sustainable Energy Generation and Management**

With regards to the Cotswolds National Landscape and its setting, the Board supports the use of small-scale forms of renewable energy that are compatible with the purpose of AONB designation. Further information on this issue is providing in the Board's Renewable Energy Position Statement.<sup>36</sup>

We recommend that the Local Plan should identify 'suitable areas' for renewable and low-carbon energy, particularly wind and solar energy. Ideally, this should be implemented for the whole of the Wiltshire Council area, in order to obtain a strategic-level, spatial understanding of potential opportunities. These suitable areas can then potentially be refined at the Neighbourhood Development Plan stage.

We recommend that the process for identifying suitable areas should include:

- a Landscape and Visual Sensitivity and Capacity Study (LVSCS), which takes account of the high landscape value accorded to the AONB designation – land parcels / sites that are identified as having high or medium-high sensitivity should be ruled out;<sup>37</sup>
- identifying key constraints and creating a buffer zone around these constraints.<sup>38</sup>

#### **Policy Theme 5 - Sustainable Transport and Air Quality**

In principle, the Board supports measures that reduce the need to travel, reduce car use and encourage more sustainable modes of transport.

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<sup>35</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/08/Energy-Guide-June-2014.pdf>

<sup>36</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/renewable-energy-ps-2014-final-apr2014.pdf>. This position statement will be reviewed in 2021, with the intention of the Board adopted an updated version in early 2022.

<sup>37</sup> Other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

<sup>38</sup> Relevant constraints would include nature conservation designations, historic environment designations and public rights of way.