

8th April 2020

England's Economic Heartland Business Unit
c/o Buckinghamshire County Council
Walton Street
Aylesbury
HP20 1UA



By email only to englandseconomicheartland@buckscc.gov.uk

Dear Sir / Madam

England's Economic Heartland – Integrated Sustainability Appraisal Scoping Report

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the England's Economic Heartland (EEH) Integrated Sustainability Appraisal (ISA) Scoping Report.

The Cotswolds Conservation Board is a statutory body that has two statutory purposes:

- To conserve and enhance the natural beauty of the Cotswolds Area of Outstanding Natural Beauty (AONB).
- To increase the understanding and enjoyment of the special qualities of the Cotswolds AONB.

The Cotswolds AONB is the largest AONB - and the third largest protected landscape - in England, covering 2,038km². It extends into 15 local authorities areas, including Oxfordshire, of which it covers 9%. It lies within commuting distance of Oxford and other towns and cities within the EEH area. As such, the AONB would be susceptible to the development pressure that would come with realising the economic potential of the region.

Together with the Chilterns AONB and the North Wessex Downs AONB, the AONBs cover 25% of Oxfordshire. The Chilterns AONB also extends into Buckinghamshire, Bedfordshire and Hertfordshire. As such, the three AONBs collectively cover a significant proportion of the EEH area.

The Board is aware that the Chilterns Conservation Board has already submitted a consultation response (attached). Most of the comments and recommendations in their response are applicable to all three of the AONBs within the EEH area, including the Cotswolds AONB. As such, the Board fully endorses the response of the Chilterns Conservation Board.

The Board does not seek to duplicate the response of the Chilterns Conservation Board. However, we do have some additional comments which are intended to complement the recommendations made in that response. These comments primarily relate to the 'duty of regard', tranquillity and climate change.

Duty of regard

Local authorities and other public bodies and 'relevant authorities' have a statutory duty to have regard to the purpose of AONB designation (i.e. to conserve and enhance the natural beauty of the AONB)¹, with the expectation that adverse impacts will be avoided or minimised where possible. Given that the EEH is the Sub-National Transport Body (STB) representing 11 Local Authorities (LAs) and six Local Enterprise Partnership (LEPs) across

¹ Section 85 of the Countryside and Rights of Way Act 2000.

the Oxford-Cambridge Arc and surrounding areas, this statutory duty also applies to the EEH.

Under the duty of regard, the purpose of AONB designation should be taken into consideration at all stages of the EEH Transport Strategy process, from initial thinking through to detailed planning stages and implementation. In particular, as indicated in the response of the Chilterns Conservation Board (in relation to paragraph 5.8.14 of the ISA Scoping Report), AONB considerations should be a prime initial determinant for transport schemes in the AONBs, rather than just being used to soften the impact of planned schemes.

Additional 'good practice', in relation to the duty of regard, is outlined in guidance published by Defra² and Natural England³ and in Appendix 4 of the Cotswolds AONB Management Plan 2018-2023⁴.

It is important to note that the duty of regard applies to development outside the AONBs (where such development has the potential to have an adverse impact on the purpose of AONB designation), as well as to development within the AONBs.

Tranquillity

The response of the Chilterns Conservation Board has highlighted the importance of the tranquillity of the AONBs, for example, in relation to Tables 4.1 and 6.1 of the ISA Scoping Report.

The Cotswolds Conservation Board's Tranquillity Position Statement provides guidance on how this issue should be addressed.⁵ In particular, it is worth noting that Section 4.5 of the Tranquillity Position Statement highlights the significance of proposals that would increase traffic flows - and / or HGV movements - in AONBs by 10% or more (or by 30% or more in less sensitive areas).

The Board recommends that this should be a key consideration in the ISA. For example, Table 6.1 should include a 'Sustainability Objective' (under 'Noise & Vibration') to ensure that the Transport Strategy does not result in traffic flows within the AONBs being substantially increased.

Climate Change

A key consideration, in relation to mitigating the impacts of climate change, should be reducing the need to travel. For example, an integral component of the Transport Strategy should be to promote and facilitate working from home and holding meetings via video conferencing. As well as reducing greenhouse gas emissions, this would also have significant benefits in terms of enhancing air quality, health, community safety and the economy.

The Board recommends that this issue should be explicitly addressed in the ISA, for example, in Table 6.1 in the 'Sustainability Objective' for 'Climate Change and Greenhouse Gases' (for example, by having an objective to reduce the need to travel).

² Defra (2005) *Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads*. ([Link](#)).

³ Natural England (2010) *England's statutory designated landscapes: a practical guide to your duty of regard*. ([Link](#)).

⁴ <https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

If you have any queries regarding these comments then please do get in touch.

Yours faithfully,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills MRTPI
Planning and Landscape Officer