

Malmesbury Neighbourhood Plan Proposal.

Response of the Cotswolds Conservation Board

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004.

The Board has two statutory purposes¹:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

1. The Board notes that Natural England stated:in its response dated 26th April 2013 to the Draft Malmesbury Neighbourhood Plan:

“ No evidence appears to have been presented to show how the sites selected may affect the nearby AONB (which is less than 350m from site 3a/15, which allocates 170 dwellings and which is a similar distance from the proposed technology park), nor whether the sites being proposed contain significant areas of priority habitat. Consequently it is uncertain that the allocations can be delivered whilst having acceptable impacts on the natural environment, contrary to a range of policies within the NPPF (including 109, 115, 117, 118).”

“In terms of landscape impact, we advise that some form of Landscape and Visual Impact Assessment (LVIA) is required for sites capable of affecting the AONB (we advise the use of the Guidance on Landscape and Visual Impact Assessment version 3 methodology for such an assessment). If a brief site visit (or use of aerial photos) showed that the vast majority of the sites allocated are in intensive farming (arable or improved pasture) this would suffice to resolve our second concern. If it cannot other options will need to be explored. “

“Resolution of this matter is of critical importance to the likely soundness of the plan.” [Board’s emboldening]

2. The Plan currently subject to consultation includes the allocation for residential, development sites 3a/15 noted in the Natural England response. However, there is still appears to be no formal assessment using an accepted methodology of the landscape and visual impact of these allocations, including impact on the landscape and scenic beauty of the Cotswolds AONB.
3. The Board notes that the Examiner of the Slaugham Parish Neighbourhood Plan² found that plan to be unsound on grounds including the lack of a proper assessment of the impact of site allocations, albeit in that case within the High Weald AONB.

¹ Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

² http://www.midsussex.gov.uk/media/SlaughamParishNeighbourhoodPlan_Examiners_Report_Final.pdf

4. It is noted that in Appendix A of the Sustainability Appraisal 'Summary of responses to the SA Scoping report' the response to a query raised by Natural England regarding the need for reference to a landscape assessment includes "The Princes Foundation for Building Community are now undertaking a more local area specific Landscape Assessment, which will inform the Neighbourhood Plan in due course."

It is not clear to the Board if this local assessment has been undertaken or been subject to consultation.

5. Appendix C of the Sustainability Appraisal 'Assessment of Housing Sites' includes for site 3a 'Development would result in changes to the landscape.' For site 15 the landscape impact is assessed as 'Negative impact associated with loss of existing site'. The impacts on the landscape for both sites are assessed to be negative or uncertain, but there is no indication of how this has been arrived at.

The Board would therefore urge that a formal assessment of the landscape and visual impact of the site allocations be undertaken prior to submission of the plan to examination.