

RE: Wiltshire Core Strategy Partial Review – Cotswolds AONB.

The Cotswolds Conservation Board have submitted their comments online to the Wiltshire Core Strategy Partial Review.

The Board's response is also repeated below.

As part of the preparation for the Hearings for the original Core Strategy a number of meetings took place between Officers at Wiltshire Council Planning Policy and the three Wiltshire AONBs.

The Board has therefore copied its response to the North Wessex Downs and Cranborne Chase AONBs, who will also be responding to the consultation process.

Can we request that once the consultation period ends a further meeting is arranged with Officers to discuss our recommendations, so we can look towards producing an agreed joint policy.

Thank you for your assistance in this matter:

Do you agree with the proposed planning policy issues (policy gaps) identified?

No

If you have answered 'NO' to the above question, please give details, ensuring that you provide the relevant Issue Reference number (Starting with 'PR') as set out in the Scoping Consultation Document. Please give details of any policy issue(s) you consider should not be incorporated within the Wiltshire Core Strategy Partial Review and your reasons for this.

Other

Core Policy 51 and its supporting text within the Adopted Wiltshire Core Strategy 2015 provides detailed information as to the strategic approach to the parts of the three AONBs that make up 44% of Wiltshire (Cranborne Chase, Cotswolds and North Wessex Downs). However, there is additional guidance both in the NPPG 2014 and through separate guidance that confirms an alternative legal and policy approach to development within the AONBs. The three Wiltshire AONBs therefore request a specific "development control" policy in respect of proposals within the AONBs for the following reasons:

The CRoW Act 2000 confirms that there is a duty of regard for Local Planning Authorities to consider the purposes of conserving and enhancing the character and special qualities of AONBs. Further to this DEFRA's Guidance Note "Duties on relevant authorities to have regard to the purposes of National Parks, AONBs and the Norfolk and Suffolk Broads" confirms DEFRA's expectations of relevant authorities are that "relevant authorities should ensure that decisions affecting these areas are properly considered and recorded in high level policy documents." Accordingly, for example in terms of EIA legislation, AONBs are also considered to be "sensitive" areas which may both increase the possibility of the need for an EIA whilst also potentially restricting the ability of the landscape to in particular accommodate major development. Specific differences have also been included within permitted development rights, in relation to the need for planning permission for barn conversions to residential use in AONBs.

The NPPG 2014 advises: “Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area. As part of this, local planning authorities and neighbourhood planning bodies should have regard to management plans for National Parks and Areas of Outstanding Natural Beauty, as these documents underpin partnership working and delivery of designation objectives.” (underlining added).

Further Ministerial Support for an alternative strategic approach to AONBs has been confirmed more recently through Ministerial Statements, for example:

27th January 2015 (DECC) “Shale Development to be banned in all UK National Parks and AONBs.”

27th March 2015 Letter from Brandon Lewis (DCLG): “While National Parks, the Broads, Areas of Outstanding Natural Beauty and Heritage Coasts quite rightly enjoy the highest degree of protection, outside of these designated areas the impact of development on the landscape can be an important material consideration. We are publicising some of these appeal cases more widely, with the help of the Planning Advisory Service, to promote greater understanding of how landscape character can be taken into account by local planning authorities in their decisions.”

Recommendation:

We therefore recommend that a specific development control policy is provided to assist in guiding development in Wiltshire's AONBs to ensure the Local Planning Authorities compliance with the CRoW Act 2000 and guidance already provided within the NPPF in respect of AONBs. This should be added to the Partial Review Strategic Objective 5 “Natural Environment” section.

The following recommendations have been drawn in part from the Cotswolds AONB existing Adopted Position Statement on Housing and Development and in respect of the NPPG, which provides additional specific guidance on AONBs:

Planning Applications In AONBs And Their Setting

In the preparation and consideration of planning applications within AONBs and their setting, where relevant the following matters should be addressed in seeking the purposes of conserving and enhancing the character and special qualities of these Nationally Protected Landscapes (in addition to Core Policy 51):

- **Consideration of the relevant AONB Management Plans, Landscape Character Assessments, Landscape Character Strategies, Guidelines and Position Statements;**
- **Developments should integrate well into the historical pattern or character of any settlement with a preference always towards brownfield land redevelopment to avoid urban encroachment into the open countryside of the AONB;**
- **Building style and materials should respect the local tradition. Inappropriate, particularly suburban, styles and materials should be avoided. Where new building is required, it should be to a high standard of design as befits a nationally designated landscape;**
- **Developments should respect and conserve and not obstruct public views to higher slopes or skylines or sweeping views across the landscape;**
- **Existing buildings built of traditional materials and of architectural merit should be restored in preference to new building. Existing buildings should be**

carefully conserved and proposals for conversion to new uses must retain their historic integrity and functional character;

- **Particular care should be taken to ensure lighting is designed to be down lighting, discrete and does not affect “dark skies”;**
- **Development should not increase road traffic in rural areas so as to erode rural lanes, materially impact on the tranquillity of AONBs, or increase dependence on car travel;**
- **The preference is for agricultural buildings to be retained in use or converted to employment/social use. Conversion to residential use is the least favoured option and in these cases suburbanisation of the immediate landscape is to be avoided. Planning permission is required for change of use of farm buildings to residential use within AONBs;**
- **Telecommunications apparatus should be placed on existing masts where possible. Where new telecommunication masts or other masts are unavoidable they should be placed so that they do not adversely affect views across, to and from prominent skylines and thus damage the sense of remoteness and open vistas. Masts should be set against trees, or use existing masts/structures. Where economically possible cables should be buried. If masts cannot be accommodated without causing landscape harm, then local rural small cell telecommunications apparatus should be used instead;**
- **Well sited small scale renewable energy projects are encouraged whilst major renewable energy projects will be subject to the tests of the NPPF;**
- **Development outside but within the setting of the AONB should not result in blocking or interference of public views into/out of the AONB or abrupt changes of landscape character;**
- **All new development, where relevant, should include detailed landscaping schemes with management plans and include full mitigation measures;**
- **Development should secure the conservation and enhancement of the rich mosaic of historical, social, economic, cultural, geological and ecological special qualities of the AONBs;**
- **Shale development is restricted by an outright ban in AONBs.**