

Winchcombe with Sudeley Neighbourhood Plan

Draft Sustainability Appraisal Scoping Report

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 welcomes the opportunity to comment at this early stage on the scope of the Sustainability Appraisal of the Winchcombe with Sudeley Neighbourhood Plan. It is clear that a substantial body of evidence has been collected by the Steering Group.
2. The Board is pleased to note in the 'Policy Context' section of the Scoping Report the reference to the Cotswolds AONB Management Plan 2013-18. Under '*Implications for Winchcombe with Sudeley*' it could be noted that the Management Plan refers users to the AONB Landscape Character Assessment² and Landscape Strategy and Guidelines³ published by the Board which contain detailed advice regarding landscape and development management.
3. The Board is pleased to note reference in paragraph 78 to the '*Assessment of the economic value of the Cotswolds AONB*' published by the Board in 2013⁴. It may perhaps be better to use the term 'business development' rather than 'exploitation' in the seventh line of this paragraph.
4. The Board is concerned that throughout the document there is reference to '*affordable housing*'. This appears to be in the context of lower cost market housing rather than as defined in the National Planning Policy Framework (NPPF) which is 'Social rented, affordable rented and intermediate housing, provided to households whose needs are not met by the market.' This latter definition will be used in the Core Strategy, and using a different definition in the in the Neighbourhood Plan will be confusing.
5. The Board notes that there appears to be no chart associated with paragraph 129.
6. The Board is surprised to note the statement in paragraph 129 that '*recently completed affordable housing has found few takers from the Winchcombe community. The housing is being taken up by others in the county.*' There could perhaps be more evidence to support this statement in the SA, particularly regarding the uptake in recent years by

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

² <http://www.cotswoldsaonb.org.uk/?page=landscapecharacter>

³ <http://www.cotswoldsaonb.org.uk/?page=landscapestrategy>

⁴ <http://www.cotswoldsaonb.org.uk/userfiles/file/publications/reports/assessment-of-the-economic-value-of-the-cotswolds-aonb-final.pdf>

members of the local community of new social housing. Housing numbers are being justified in Core Strategies/Local Plans partly by the need to provide affordable (as defined in the NPPF) to meet local need as a proportion of market housing required for viability purposes. If the SA evidences that there is no real local need for social housing then this would be evidence to challenge housing figures arising from the Core Strategy.

7. There could usefully be reference to the need to conserve and enhance the tranquility of the area. Paragraphs 123 and 125 of the NPPF provide useful guidance on this subject. The Board's Position Statement on tranquility in the AONB⁵ includes appendices showing the relative tranquility and dark skies within the AONB.

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⁵ <http://www.cotswoldsaonb.org.uk/userfiles/file/consultations/tranquillity-and-dark-skies-nov-09-revised-oct-2010.pdf>