

Cotswolds National Landscape

Management Plan 2025 – 2030

A note on terminology

In June 2020 the Cotswolds National Landscape Board decided to replace the term Area of Outstanding Natural Beauty (AONB) with National Landscape. All AONBs are now branded as National Landscapes.

This plan uses the name Cotswolds National Landscape for the area designated as the Cotswolds AONB. At times it is abbreviated to CNL. AONB is still the legal designation.

The name used for the organisation associated with the designation is the Cotswolds National Landscape Board. At times this is abbreviated to CNL Board or The Board.

The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.

Editorial Guide to Version 1

Text highlighted in yellow indicates a change of content from the 2023 – 25 plan. Where content has been moved it is not highlighted.

Text in red is editorial narrative or an indication of likely future changes.

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Contents at a glance

This table will be added at the design stage. The text below includes a footnote so has been included here to maintain the correct footnote numbering.

Purpose 1: To conserve and enhance the natural beauty of the Cotswolds National Landscape¹

¹ In delivering purposes 1 and 2, the Board has a duty to foster the social and economic wellbeing of people living in the National Landscape. This duty is addressed through relevant policies under the two purposes.

Executive summary

The Cotswolds National Landscape (CNL) Management Plan is a statutory plan, which sets out the vision, outcomes and policies for the management of the CNL for the period 2025-2030. These are summarised in the table on the previous page.

The vision sets the overall context for the plan and was adopted in 2025 following consultation with stakeholders. The vision was drawn up in the light of three interlinked key issues:

1. The climate emergency
2. Nature's decline and the ecological crisis
3. Health and societal changes

The plan goes on to define the special qualities of the CNL. These are the aspects of the area's natural beauty which make it distinctive and which are considered valuable, especially at a national scale. It is the impact of these key issues, amongst others, on the special qualities that has informed the development of the plan's outcomes and policies.

The outcomes express the desired state of the CNL. They are arranged under three overarching headings which reflect the CNL's purpose of designation (to conserve and enhance natural beauty) and the CNL Board's additional purpose (to increase understanding and enjoyment). These headings are illustrated further with three broad aims:

1. Cross Cutting Themes; Tackling 21st century issues through progressive partnerships.
2. Conserving and Enhancing Natural Beauty; Influencing and delivering for landscape, nature and climate.
3. Increasing Understanding and Enjoyment; Ensuring access, learning and wellbeing opportunities are for everyone.

When viewed together the outcomes paint a powerful picture of what the Cotswolds would be like if this plan's vision became a reality:

Outcome 1 – Climate action: The Cotswolds National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards net zero emissions.

Outcome 2 – Working together: Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.

Outcome 3 – Landscape: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.

Outcome 4 – Local distinctiveness: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.

Outcome 5 – Tranquillity: Noise pollution and visual disturbance are minimised to maintain tranquillity across the National Landscape.

Outcome 6 – Dark skies: Fewer areas of the Cotswolds National Landscape are affected by light pollution.

Outcome 7 – Historic environment and cultural heritage: The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.

Outcome 8 – Biodiversity and nature recovery: There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

Outcome 9 – Water. Waterways and bodies of water within the Cotswolds National Landscape have good ecological status.

Outcome 10 – Rural land management: Land management conserves and enhances the natural beauty of the Cotswolds National Landscape whilst balancing the competing pressures of recovering nature, tackling climate change, food production, supporting livelihoods and public access.

Outcome 11 – Development and transport: Development and transport schemes positively contribute to the purposes of protected landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.

Outcome 12 – Health and wellbeing: The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.

Outcome 13 – Access and recreation: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.

Outcome 14 – Sustainable tourism: Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.

The policies outline in detail how these outcomes can be achieved and are perhaps the most important – and most utilised – part of the plan.

Although the CNL Board will play an important role in delivering the vision, outcomes and policies of the Management Plan, successful delivery is also dependent on all individuals and organisations with an interest in the Cotswolds.

The Management Plan identifies key actions for specific stakeholders. This is a plan for the place not the body. The Management Plan also identifies key indicators for each policy which will be used to gauge progress in its delivery.

Chair's foreword

The Cotswolds National Landscape has previously produced a Management Plan every five years, however we made the decision to undertake a limited interim review of the last plan to cover the period 2023-25, so that we can align with the timeline of the government's 25-year Environment Plan and accommodate any changes in policy resulting from the 2019 Landscapes Review. **This plan sees a return to the five yearly cycle.**

Our plan continues to address the many issues currently facing the Cotswolds National Landscape. These include helping to mitigate and adapt to climate change, supporting the recovery of wildlife and helping nature to thrive, ensuring everyone has access to the landscape to help improve their health and wellbeing, producing food and other products, and ensuring businesses and livelihoods are maintained. All this, whilst still maintaining the special characteristics and elements of natural beauty which make it a designated Area of Outstanding Natural Beauty.

Many of these demands are increasing but our understanding of their consequences is improving all the time. In our Vision for the Cotswolds, we acknowledge the need to constantly find new win-win solutions that conserve and enhance the landscape and serve the people who live, work, and visit here. Working collaboratively, in partnership with others, will be essential to help identify and implement these solutions. This new plan informs how we work in the Cotswolds National Landscape to balance the needs of nature, people, climate – and how we transition into a future that will surely be very different from now.

Brendan McCarthy
Chair, Cotswolds National Landscape Board
February 2025

1. Introduction

Management Plan – context

What is the Cotswolds National Landscape?

The Cotswolds National Landscape (CNL) was designated as an Area of Outstanding Natural Beauty (AONB) in 1966, and extended in area in 1990. Although AONB is still the legal name of the designation it was rebranded as a National Landscape for most purposes in June 2020. At 790 square miles, or 2038 square kilometres, it is the largest AONB – and the third largest protected landscape, including National Parks – in England. The CNL stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north. It cuts across 15 local authority areas.

National landscapes are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them². The statutory purpose of AONB designation is to conserve and enhance their natural beauty³.

Each **national landscape** has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views. Information on the 'special qualities' of the CNL is provided in Chapter 4.

Further information on national landscape designation is provided in Appendix 1 and information on 'natural beauty' is provided in Appendix 2.

What is the Cotswolds National Landscape Board?

The CNL Board ('the Board') was established by Parliament in 2004 as the Cotswolds Conservation Board and has two statutory purposes⁴:

1. To conserve and enhance the natural beauty of the Cotswolds National Landscape.
2. To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social wellbeing of people living in the National Landscape.

In circumstances where these purposes and duties are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the CNL⁵.

The Board consists of 37 members, of whom 15 are nominated by local authorities, eight by parish councils and 14 are appointed by government. The Board's work programme is delivered

² Department for Environment, Food and Rural Affairs (Defra) (2015). Areas of Outstanding Natural Beauty: Landscape Protection and Enhancement Support Scheme (England) 2015 – 17. Application to European Commission.

³ Section 82, Countryside and Rights of Way Act (2000).

⁴ Section 87, Countryside and Rights of Way Act (2000), as amended by the Natural Environment and Rural Communities (NERC) Act (2006).

⁵ This prioritisation of conserving and enhancing is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974.

by a small team of employees, supported by volunteers including the Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the CNL.

Further information about the Board can be found in Appendix 3 and on the Board's website: www.cotswoldsaonb.org.uk

What is the Cotswolds National Landscape Management Plan?

The CNL Management Plan ('the Management Plan') is a statutory plan⁶, which sets out policies for the management of the CNL⁷. The CNL Board is the body responsible for preparing and publishing the Management Plan and for reviewing it at intervals of no more than five years. This is the **sixth** such document prepared by the Board.

Although the Board is the body responsible for preparing and publishing the Management Plan and will play an important role in its delivery, the Board doesn't actually own or directly manage any of the land in the National Landscape or its setting. As such, the policies of the Management Plan are also intended to guide the work of other stakeholders in delivering the Management Plan's vision and outcomes.

Why do we have a Cotswolds National Landscape Management Plan?

The Management Plan is a key mechanism for achieving the purposes of conserving and enhancing the natural beauty of the CNL and increasing the understanding and enjoyment of the CNL's special qualities. The Management Plan is the only plan to guide the management of the CNL as a whole.

Who will deliver the Cotswolds National Landscape Management Plan?

This plan is ultimately about partnership working to make the vision a reality.

The CNL Board will play an important role in delivering the vision and outcomes of the Management Plan. However, its successful delivery is also dependent on other stakeholders, including local authorities and other public bodies, land owners and land managers, non-government organisations, developers, businesses and individuals. Many of these stakeholders already make a significant contribution to delivering the vision and outcomes of the Management Plan. This is a plan for the place and all the bodies and individuals engaged in it.

It is a legal requirement for 'relevant authorities', including all public bodies, to seek to further the purpose of conserving and enhancing the natural beauty of the CNL⁸. This legal requirement is known as the 'seek to further' duty.

So, for example, local planning authorities should seek to further this purpose when developing their Local Plans and when making decisions on planning applications

The 'seek to further' duty is intended to ensure that the purpose for which a national landscape has been designated (i.e. to conserve and enhance the natural beauty of the AONB) is recognised as an essential consideration if any decisions or activities that impact on the AONB,

⁶ Section 89 (1), Countryside and Rights of Way Act (2000) as amended by the NERC Act (2006).

⁷ Section 89, Countryside and Rights of Way Act (2000) as amended by the NERC Act (2006).

⁸ [Update to LURA](#)

with the expectation that adverse impacts will be avoided or mitigated where possible⁹. (check footnote relevance)

More information about the 'seek to further' duty is provided in Appendix 4.

How will the Cotswolds National Landscape Management Plan be delivered?

How the Board will contribute to the delivery of the Management Plan itself, as well as encourage and support other stakeholders is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme.

Every individual and organisation with an interest in the CNL can help make this plan's vision and outcomes a reality by contributing to its delivery. The 'Stakeholder Delivery' table in Appendix 5 provides an indication of the key measures that the Board invites specific stakeholders to undertake in order to help deliver this plan.

How will the delivery of the Cotswolds National Landscape Management Plan be monitored?

The Board will monitor and evaluate its contribution to the delivery of the Management Plan through the quarterly and annual review of its work programme. The 'State of the Cotswolds Report' – together with other local and national monitoring and surveys – will contribute to the provision of evidence, which is a crucial part of managing the National Landscape.

The Board will endeavour to monitor the key actions identified in the 'Stakeholder Delivery' table in Appendix 5. It will also endeavour to monitor compliance with the 'duty of regard' (see Appendix 4).

Appendix 6 shows the key targets from the national Protected Landscapes Targets and Outcomes Framework and additional local key indicators that will be used to monitor the delivery of the Management Plan. The monitoring indicators will demonstrate change over time. There are timed targets within supporting documents such as the Board's key performance indicators and the Cotswolds Nature Recovery Plan.

Management Plan – process

Much of the groundwork for the preparation of this plan has been undertaken in recent years. Throughout 2023 and 2024 research was commissioned taking a closer look at how the carbon footprint of the CNL could be developed into a pathway towards net zero. A great deal of stakeholder engagement has also been undertaken by partners through the development of the six Local Nature Recovery Strategies coincident with this Cotswolds.

A consultation was undertaken internally and with our local authority and public sector partners over the summer of 2024~~2~~ and a wider fuller consultation was undertaken in the autumn. Throughout both of these consultations XX responses were received from XX individuals representing XX organisations. More individuals contributed as several responses were compiled from across teams.

⁹ Natural England (2010). England's statutory designated landscapes: a practical guide to your duty of regard.

Management Plan – structure and use

The core of the plan is made up of four components:

- Vision
- Key Issues
- Special qualities
- Outcomes and policies

The vision sets the overall context for the plan and was adopted by the CNL Board in June 2021 following consultation with stakeholders. The vision was drawn up in the light of three identified key issues:

1. The climate emergency
2. Nature's decline and the ecological crisis
3. Health and societal changes

The plan goes on to define the special qualities of the CNL. These are the aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. It is the impact of these key issues, amongst others, on the special qualities that has informed the development of the plan's outcomes and policies.

The outcomes and policies are arranged under three over-arching headings which reflect the National Landscape's purpose of designation (to conserve and enhance natural beauty) and the National Landscape Board's additional purpose (to increase understanding and enjoyment). These headings are illustrated further with three broad aims:

1. **Cross cutting themes**
Tackling 21st century issues through progressive partnerships.
2. **Conserving and enhancing**
Influencing and delivering for landscape, nature and climate.
3. **Increasing understanding and enjoyment**
Ensuring access, learning and wellbeing opportunities are for everyone.

The outcomes express the desired state of the CNL and the policies outline how this can be achieved.

The supporting text for each outcome outlines the underlying issues that the policies are aiming to address. The outcomes have been derived from the vision and were used to establish the policies. They form the link between the long-term vision and immediate action.

The policies are perhaps the most important – and most utilised – part of the Management Plan. They serve five main purposes:

1. They are principles for how the CNL should be managed in order to:
 - a. conserve and enhance the natural beauty of the CNL;
 - b. increase the understanding and enjoyment of the CNL's special qualities;
 - c. foster the social and economic wellbeing of local communities;
 - d. address issues that are having an adverse effect on the CNL;
 - e. achieve the vision and outcomes of the Management Plan.
2. They provide a framework for action by all stakeholders with a role to play in the management of the CNL including the CNL Board.

3. They represent the policies of the CNL Board.
4. They are intended to guide, influence and be used by stakeholders in their own plans, policies, proposals, work programmes and decision making.
5. Together with other guidance produced by the CNL Board, they are intended to facilitate a consistent and co-ordinated approach across the whole of the CNL.¹⁰

It is important that all of the policies should be considered in their entirety, particularly in relation to development and rural land management. For example, when a development is being proposed in the National Landscape, the developer and the local authority should have regard to all of the policies, not just to Policy CE13 (Development and Transport – Principles).

One of the areas which the Management Plan policies relate to is in the policy-making and decision-making of local planning authorities (LPAs). For example, the CNL Board would encourage LPAs to have regard to the Management Plan policies when reviewing and developing their own policies, including those within their development plans. The Management Plan policies are aspirational and as such, they might go further than current policies in individual development plans. It is intended that these aspirational policies will aid in helping to develop and evidence new local plan policies.

The Management Plan should be a material consideration in planning decisions. However, it is recognised that planning law requires that applications for planning permission be determined in accordance with the LPA's development plan (unless material considerations indicate otherwise).

The forthcoming Defra guidance on the 'seek to further' duty may provide guidance on how national landscape management plans should be taken into consideration in relation to this duty. In the meantime, it is important to note that Natural England's view, in this regard, is that proposed measures 'should align with and help to deliver the aims and objectives of the designated landscape's statutory management plan'. (This text will need updating once the Defra guidance has been published. However, the Defra guidance is expected to say something along the lines of the Natural England advice.)

Section 245 of the Levelling Up and Regeneration Act makes provisions for the Secretary of State to require relevant authorities to contribute to the preparation, implementation or review of national landscape management plans and to set out how a relevant authority may or must do so.¹¹ These provisions could potentially come into effect, via secondary legislation, as early as 2025.

The policies are consistent in the use of the verbs 'must', 'will' and 'should', as outlined below:

- **'Must'** is used where the relevant stakeholder has a statutory requirement to implement the policy.

¹⁰ The Management Plan and guidance documents produced by the Cotswolds National Landscape Board are the only publications that guide the management of the Cotswolds National Landscape as a whole. This is why the Board's guidance documents are specifically mentioned in several policies. The variation in local conditions and the importance of other plans and guidance that relate to specific parts of the National Landscape (i.e. individual local authorities) is also recognised.

¹¹ [Section 245 of the Levelling Up and Regeneration Act 2023](#).

- **'Will'** is used where the Board is the stakeholder with primary responsibility for applying and/or delivering the policy.
- **'Should'** is used where a stakeholder other than the Board has primary responsibility for applying and/or delivering the policy (although the Board would still play an active role in many of these).

The plan goes on to consider how it can be delivered and monitored. Further detail and evidence are then provided in appendices.

2. Vision

A Cotswolds vision: a National Landscape for everyone

A time of opportunity

The Cotswolds is good for us; we feel better when we are here and engaged with the natural beauty of the landscape around us. In recent years we have been reminded of the intrinsic relationship between ourselves and the natural world – and the condition it is in. We believe the Cotswolds National Landscape offers opportunities for optimism, regeneration, wellbeing, and inclusion.

Challenges lie ahead

We are in the midst of a global climate emergency and an ecological crisis. Our awareness of ongoing social and economic inequalities is heightened. In the Cotswolds, these concerns are as real for us too, and we face significant challenges: climate change; threats to wildlife and habitat; changes to the farming landscape and agriculture; finding ways to deliver opportunities for younger people and provide for an ageing population; and achieving access to, and involvement in, the countryside for everyone – in ways which help benefit the countryside and encourage a diverse range of people to appreciate and care for the Cotswolds.

What can we do, and how should we do it?

To address these issues and begin to make improvements, we need to challenge ourselves. We must avoid complacency, and not adhere doggedly to past beliefs – this will hold us back, and limit how much positive change we can introduce. Instead, we need to embrace new ways of thinking in order to find win-win solutions which both conserve and enhance natural beauty, and serve the people who are here. We will work hard, and in partnership – to find outcomes which offer the most positive benefits and the least negative impact. We will need to demonstrate collaboration and leadership. We will need to be energetic and proactive. We will need to be bold, brave, and confident. Above all, we will need to acknowledge that we can't do it all alone – we want to work with other organisations and individuals to achieve results which benefit all of us, and nature.

The future should be bright

The treasured landscapes which make the Cotswolds nationally and internationally important are diverse in character, as are the people who live, work, and visit here. There is no 'one size fits all' for the future – but we have a greater opportunity than ever before to pull together as communities across the Cotswolds, and to work with each other to harness our dedication and expertise to forge the future of the Cotswolds. This place, the Cotswolds National Landscape, is for everyone, from all walks of life. In sharing it and looking after it, we will continue to create a place that is vibrant, unique, welcoming, and truly special – for people and for nature. We will work towards ensuring that the Cotswolds stays a working landscape, where agriculture thrives and supply chains are secure. Our communities should be connected and diverse, but self-sustaining. Visitors should feel welcome to enjoy being here, confident about access, and motivated to give something back to help look after the landscape. This should be a place where the landscape, nature, and people work in harmony with each other.

The Cotswolds will be a place that will inspire generations of people to look after it – now and in the years ahead.

3. Key issues

The Cotswolds National Landscape (CNL) Board has identified three key issues that it considers to be having a significant effect on this plan's outcomes and in achieving its two purposes of:

- conserving and enhancing the natural beauty of the CNL; and
- increasing the understanding and enjoyment of the special qualities of the CNL.

These can be summarised as follows:

Key Issue 1 - The climate emergency

Will be updated to consider the continued relevance of the Climate Change Strategy, Climate Crisis Commitment and Colchester Declaration in the light of

- 3Keel report "Achieving consensus on a pathway to Net Zero by 2050 and resulting Action Plan" & the preceding Small World Carbon Assessment
- Defra requirement to produce an adaptation plan "...Conservation Boards are being asked to prepare Climate Change Adaptation Management Plans produced, embedded in, or linked with, their Management Plans by 2028, and in all future Plans1."¹²
- Climate change targets in the Targets and Outcomes Framework

There is an editorial issue between the content here and the content under the policies. In general, the content under the policies is supporting and this section is scene setting, there is a big overlap though.

Mitigating and adapting to climate change whilst conserving and enhancing the natural beauty of the National Landscape.

Climate change is happening, and we are already experiencing the dangerous impacts of a rapidly heating climate. Many of the defining characteristics and special qualities of the CNL are threatened, however, a window of opportunity remains to prevent its worst impacts, and to help people and wildlife adapt.

The CNL [Climate Change Strategy](#) (adopted by the CNL Board in February 2022) summarises our current understanding of the climate change impacts on the Cotswolds and what stakeholders can do to both adapt to and mitigate these impacts.

Ambitious climate action is necessary to mitigate climate change and avoid its worst consequences for the Cotswolds, and the CNL is not exempt from playing a full part. Farming needs to change to improve soils to continue producing food, reduce soil loss, sequester carbon and help with improving water quality and flood management; tree cover needs to increase to capture carbon and support nature recovery, much more of our energy needs will have to be met through low carbon energy technologies. Buildings need to become energy efficient and infrastructure needs to be more resilient. All this has to be done in ways that conserve and enhance the Cotswolds for future generations.

The Landscapes Review¹³ emphasised the importance of the role National Landscapes should play in mitigating and adapting to climate change:

In November 2021 the CNL Board adopted a [Climate Crisis Commitment](#) in which states that:

¹² NAP3 Annex 1: Climate risks and opportunities

¹³ Defra (2019) [Landscapes Review Final Report](#)

“It is our commitment to identify a scenario which allows us to endorse a path to net zero emissions (or better) by 2050 (or sooner).”

In line with all AONB’s commitment in the Colchester [Colchester Declaration](#)¹⁴, this scenario will include clear, measurable targets to achieve net zero. This pathway will be in place in time for inclusion in the 2025 Cotswolds National Landscape Management Plan.

Some climate change mitigation and adaptation measures have the potential to adversely affect the natural beauty of the National Landscape, but with careful design and implementation, many of these measures can not only conserve but also enhance natural beauty. The challenge is to develop a pathway to net zero which also conserves and enhances natural beauty.

Key Issue 2 - Nature’s decline and the ecological crisis

Enabling wildlife to recover, flourish and adapt to climate change through a robust nature recovery network which additionally provides us with clean air and water and healthy soils.

The story of our loss of wildlife is well documented and understood. Climate change is a well-recognised driver combining with habitat destruction to threaten the loss of our already diminished wildlife at an even greater scale and pace. The need for action is urgent if we are to avoid a mass extinction event. The Landscapes Review¹⁵ found that this urgent need to do more for nature was a dominant theme:

In our call for evidence, the message was clear: more than any other single thing, people and organisations agreed that our landscapes should do more for nature.

We know what we have to do to allow our wildlife to flourish and adapt to climate change. We need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. Such a nature recovery network is not only good for wildlife, it provides a range of ‘ecosystem services’ such as clean water or food or a beautiful place to get away from it all and enjoy some peace surrounded by nature. These ecosystem services are critically important to the wellbeing and economy of people living in and around the Cotswolds.

The Landscapes Review proposed that:

National Landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries.

National landscapes collectively responded to the challenge of the Landscapes Review with the [Colchester Declaration](#)¹⁶¹⁵ which contains commitments to produce nature recovery plans and restore habitats and populations of endangered species.

The Cotswolds Nature Recovery Plan was adopted as CNL Board guidance in October 2021. It represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change, in a timely manner.

¹⁴ A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019

¹⁵ Defra (2019) [Landscapes Review Final Report](#)

¹⁶ A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019.

We are entering a new era of collective and resourced action on delivering nature recovery. Now is the time to raise our ambition for what can be achieved. The international obligation that the government has signed up to of 30% of land and sea managed for nature by 2030 is an indication of this ambition.

New statutory Local Nature Recovery Strategies have been developed which identify and map nature recovery priorities and measures. They are a key tool for driving and directing resources towards the recovery of nature. Biodiversity Net Gain already uses them for targeting and other funders have indicated a willingness to do the same. There are six of these strategies coincident with the Cotswolds and the Cotswolds Nature Recovery Plan has been used to influence their content.

The national statutory Protected Landscapes Targets and Outcomes Framework (Appendix 6) includes seven targets directly relevant to the recovery of nature in the Cotswolds. These are targets for the place and are owned by all stakeholders. When combined with the duties on public bodies to consider what they can do to conserve and enhance biodiversity and to further the purposes of designation of protected landscapes they will help drive resources to the recovery of nature across the national landscape.

Key Issue 3 - Health and societal changes

Ensuring that livelihoods are maintained and that everyone within and around the National Landscape can realise the health and wellbeing benefits of accessing its natural beauty.

We face unprecedented environmental challenges in the form of the climate emergency and ecological crisis. We have to respond quickly and vigorously to address them and furthermore we have to do this in a way that supports livelihoods and communities. The solutions have to work in social and economic terms as well as environmental if they are to have a lasting impact.

The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The Landscapes Review published by Julian Glover in 2019 challenged Protected Landscapes to do more to welcome people and crucially to do a lot more to ensure that people from currently underrepresented groups can enjoy the benefits of accessing them too. A challenge that the Cotswolds National Landscape Board intends to address, building on current activity and continuing to work with stakeholders, old and new.

The impact of these key issues on the natural beauty of the CNL were considered during the development of the vision and the outcomes.

4. The special qualities of the Cotswolds National Landscape

The 'special qualities' of a national landscape are those aspects of the area's natural beauty which make the area distinctive and which are considered valuable, especially at a national scale. They are the key attributes on which the priorities for its conservation, enhancement and management are based. They bring out the essence of the national landscape as an evocative description of the area rather than as a statistical account.

The Cotswolds is a rich mosaic of historical, social, economic, cultural, geological, geomorphological¹⁷ and ecological features. The special qualities of the Cotswolds National Landscape (CNL) are:

- The unifying character of the limestone geology – its visible presence in the landscape and use as a building material;
- The Cotswold escarpment, including views from and to the National Landscape;
- The high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views;
- River valleys, the majority forming the headwaters of the Thames, with high-quality water;
- Distinctive dry stone walls;
- Flower-rich grasslands including floodplain meadows and neutral grasslands and particularly limestone grasslands;
- Ancient broadleaved woodland particularly along the crest of the escarpment.
- Variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness;
- The tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;
- Extensive dark sky areas away from major sources of light pollution;
- Distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity;
- An accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail;
- Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks;

¹⁷ Geomorphology is the physical features of an area, strongly influenced by geology.

- A vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olympics, cheese rolling and woolsack races

5. Cross cutting themes

Tackling 21st century issues through progressive partnerships

The climate emergency

Outcome 1 – Climate action:

The Cotswolds National Landscape is a place that is mitigating and adapting to climate change, and has a clearly defined pathway towards net zero emissions.

Our climate is rapidly changing, driven by greenhouse gas emissions from human activities. We are already experiencing the dangerous impacts of a rapidly heating climate and many of the defining characteristics and special qualities of the Cotswolds National Landscape (CNL) are threatened by climate change and potentially our responses to it. Even if we cut emissions to zero tomorrow, further warming is inevitable due to the legacy of greenhouse gases in the atmosphere that will take decades to decline to safe levels. However, a window of opportunity remains for ambitious climate action to prevent its worst impacts, and to help people and wildlife adapt.

The need for climate action is urgent, but it needs to be well thought out and carefully implemented. The CNL is not exempt from playing a full part, but all this can be and should be done in ways that conserve and enhance the Cotswolds for future generations. Improving carbon literacy and understanding of the Cotswold landscape will help ensure the CNL remains both beautiful and resilient into the future.

Policy CC1: Climate change – mitigation

Consider a new first policy around our new pathway to net zero then the detailed policies below re-ordered under its main headings? Include the 1 pager as an appendix & cite the full report as adopted?

Add a policy about achieving the targets in the national Targets and Outcomes Framework

Target 6. Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels.

Target 8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

Target 7 has been excluded as it concerns the area of peat restored.

CC1.1. Greenhouse gas emissions should be minimised through a range of measures, including:

- Reducing energy demand in existing and new buildings and infrastructure:
 - Improving energy efficiency, for example, by retrofitting existing buildings. Where traditional buildings including listed buildings are retrofitted, this must be undertaken by historic building specialists and in a manner that is compatible with the purpose of National Landscape (AONB) designation;
 - Reducing embodied carbon through secondary and recycled material use within all construction unless demonstrably unachievable on technical and practical grounds;
 - Utilising passive measures, for example the orientation of buildings and the provision of high levels of insulation;
 - Sustainable construction methods and management plans to reduce and manage construction waste should be implemented;
 - Incentivising voluntary sustainability standards, for example BREEAM, Building with Nature, and One Planet Living principles.
- Reducing energy demand through transport and travel:
 - Reducing car use for example, through increasing green and active travel including public transport and increasing shared mobility through car sharing schemes;
 - Reducing the need to travel for example by encouraging home working and affordable housing provision close to sources of employment, services and facilities;
 - Improving the sustainability of travel through for example; public transport hub promotion/integration and information, and prioritising the provision of walking, cycling and public transport use, including adequate cycle parking
 - Providing sufficient infrastructure for the charging of electric vehicles, scooters and bikes;
 - Promoting messages aimed at minimising air travel by Cotswolds residents.
- Generating energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation:
 - All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources. Alternatives to fossil fuel energy sources should be used. **(Is this dependent on the de-carbonisation of the national grid or is there an expectation that that all residual energy needs within the CNL should be met by renewable energy generated within the CNL.?)**
- Purchasing locally produced food products and services and encouraging small-scale vegetable growing in gardens and allotments.

CC1.2. Climate change mitigation including the sequestration of carbon should be a key component of land management practices and Environmental Land Management, and rural development support mechanisms in the National Landscape.

CC1.3. Climate action should be undertaken in a way compatible with the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.

Policy CC2: Climate change – adaptation

CC2.1. The risks posed by the consequences of climate change should be reduced through a

range of adaptation measures, including those identified in relevant policies of this Management Plan¹⁸.

CC2.2. Climate change adaptation should be a significant driver in all new development, infrastructure and transport provision¹⁹.

CC2.3. Climate change adaptation should be a key component of land management practices and Environmental Land Management and rural development support mechanisms, in the National Landscape.

CC2.4. Further research into the predicted impacts of climate change on the CNL should be undertaken. This research should be used to advise and inform sustained behavioural change to adapt to climate change and conserve and enhance the National Landscape and its special qualities.

Global and UK average temperatures have increased by around 1.2°C since the 1850 – 1900 period. The UK Met Office’s 2021 report²⁰ states that climate change trends projected for the 21st century show an increased chance of warmer, wetter winters and hotter, drier summers along with an increase in the frequency and intensity of extremes.

Between 2009-2018, UK winters have been on average 5% wetter than 1981-2010 and 12% wetter than 1961-1990, and that summers in the UK have also been 11% and 13% wetter, respectively” Total rainfall from extremely wet

days increased by around 17% in the decade 2008-2017 for the UK as a whole and surface water flooding is projected to increase in frequency and severity in the future. In addition to increasing precipitation volumes, climate change has already made it 12-25% more likely that the UK will again experience a summer as hot as 2018, an extreme that is projected to become 50% more likely with future warming .

In November 2021 the CNL Board adopted a [Climate Crisis Commitment](#) in which states that:

It is our commitment to identify a scenario which allows us to endorse a path to net zero emissions (or better) by 2050 (or sooner).

The CNL Board first published a ‘Climate Change Strategy for the CNL in 2012 and an [updated version](#) was adopted in February 2022. Most of the measures proposed in the strategy to mitigate and adapt to the impacts of climate change, and much of the supporting information has been incorporated into the Management Plan to some degree

Farming needs to change to improve soils to continue producing food, reduce soil loss, sequester carbon and help with improving water quality and flood management; tree and hedgerow cover needs to increase to capture carbon and support nature recovery. To achieve net zero greenhouse gas emissions, much more of our energy needs will have to be met through

¹⁸ Relevant policies (with the most relevant shown in **bold**) include: CC6, para 1; **CC4, para 2**; **CC5, para 1**; CE6, para 1; **CE7, para1**; CE8; **CE9, para 3**; CE10, paras 1 & 3; CE11, para 2; and UE3.

¹⁹ Additional measures not explicitly addressed in the Management Plan include protecting transport infrastructure from extreme weather events and ensuring that all new and retrofit development recognises the need to compensate for hotter summers and extreme weather events.

²⁰ Met Office (2021). [UK Climate Projections: Headline Findings](#), version 3 p. 6-7.

low carbon energy technologies, buildings need to become energy efficient and infrastructure needs to be more resilient.

The percentage of households in the CNL having no car is 3%, and many people do not have access to a car during the day. This means they are heavily dependent on the frequency and quality of public and/or community transport to access local services. It also exacerbates issues of rural isolation. The introduction and use of technology to help address transport issues and offer increased alternatives such as car sharing and call-up public transport systems could provide viable options for residents and visitors alike whilst simultaneously helping to mitigate climate change. The provision of affordable housing within the National Landscape would help reduce the climate impact of travel to work journeys for those living and working in the area. Any consideration of the carbon footprint of Cotswolds residents must include the impact of flying which is estimated to be two and a half times higher than the UK average.²¹

Measuring embodied carbon shows that maintaining, refurbishing and retrofitting traditional buildings can reduce carbon emissions in the built environment by over 60%²² by 2050 compared to new building. Done correctly this can conserve the buildings as a heritage asset, make them more liveable in a changing climate and help mitigate climate change. Passive energy conservation measures, for example the orientation of buildings and the provision of high levels of insulation also help to minimise the risk of overheating.

Working together

Outcome 2 – Working together:

Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.

This Management Plan is a place-based plan for the Cotswolds National Landscape (CNL), not just the National Landscape Board – the Board is unable to deliver the plan by itself. The Plan helps inform the activity of a multitude of partners, stakeholders, landowners, communities and visitors in order to contribute to the purposes of the protected landscape designation.

CNL is an administratively complex area, extending across 15 local authorities and three geographical regions. This makes it very challenging to develop and deliver a consistent approach to conserving and enhancing the natural beauty of the CNL including its special qualities and increasing the understanding and enjoyments of its special qualities. However, the potential benefits are huge, including better coordination of planning, development, Environmental Land Management schemes, nature recovery planning, tourism and recreation.

Taking a consistent approach, in this context, means being consistent in having regard to (and, ideally, being compatible with): the statutory purpose of conserving and enhancing the natural beauty of the National Landscape; national policy relating to national landscapes; the policies of the Management Plan; and the guidance and position statements published by the Board. However, this does not necessarily mean that decisions made or actions taken will always be the same across the whole of the National Landscape, as these will vary depending on local social, economic and environmental circumstances.

²¹ Small World Consulting (2023). A Green House Gas Emissions Assessment and Target Scenario for the Cotswolds National Landscape. (unpublished).

²² Historic England (2020). [There's No Place Like Old Homes, Re-use and Recycle to Reduce Carbon](#)

Guidance on what is meant by 'landscape-led' is provided in the Board's Landscape-led Development Position Statement.

Policy CC3: Compliance with section 85 of the Countryside and Rights of Way Act

CC3.1. Relevant authorities, including public bodies and statutory undertakers, must seek to further the purpose of conserving and enhancing the natural beauty of the CNL, in line with Section 85 of the Countryside and Rights of Way Act 2000.

The legal requirement for relevant authorities to seek to further the purpose of National Landscape designation (the 'seek to further' duty) provides an important mechanism for conserving and enhancing the natural beauty of the National Landscape. Further information on the 'seek to further' duty is provided in Appendix 4.

Policy CC4: Working in partnership

CC4.1. Stakeholders should work in partnership to support the purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape (CNL) and increasing the understanding and enjoyment of its special qualities. Stakeholders should also cooperate in fostering the economic and social wellbeing of communities in and around the National Landscape.

CC4.2. Communities and businesses within and around the CNL should be encouraged to value and celebrate being part of a nationally recognised landscape and to contribute to the purpose of national landscape designation.

The new duty to seek to further the purposes of designation combined with a statutory targets and outcomes framework act as a powerful driver for public bodies to continue working towards the outcomes in the plan and to contribute even more.

Though there is generally a significant level of appreciation for the Cotswolds landscape amongst communities and businesses in and around the CNL, awareness and understanding of its status as a protected landscape and the implications of this are lacking. This reduces awareness of the need for the conservation and enhancement of the sense of place, its distinctive features and special qualities.

6. Conserving and enhancing

Influencing and delivering for landscape, nature and climate.

Landscape

Outcome 3 – Landscape:

The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.

Policy CE1: Landscape

- CE1.1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.
- CE1.2. Proposals that are likely to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.
- CE1.3. Conserving and enhancing landscape character should be a key objective of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.
- CE1.4. Rural skills training and the utilisation of those skills – such as dry stone walling, stonemasonry, traditional woodland management and hedgelaying – should be supported to ensure the long-term retention, creation and management of the key features of the Cotswolds National Landscape.

Landscape changes over time. Such change is often perceived as slow or non-existent, but when a view or place is compared to its earlier self, even over a comparatively short time span, the change can be dramatic. Since national landscape designation in 1966 much has changed in the Cotswolds, driven to a large extent by technological advances in agriculture,

Environmental Land Management schemes and woodland grants, changes in the shooting and equestrian sectors, tree diseases, fluctuations in commodity prices, population growth and migration and changes in employment and communications, all of which can be influenced by Government policy and financial support. Continued change is inevitable and will have an impact on the landscape and the appearance of the Cotswolds in the future. Addressing the climate emergency, nature's decline and the ecological crisis will cause more change. This change needs to be managed and guided to ensure the Cotswolds retains its landscape character and special qualities.

It is important to consider the cumulative impact of changes on landscape character. This applies to both incremental building development and land use change, particularly equestrian development and horticultural production under polytunnels.

The surroundings and setting of the National Landscape are important to its landscape and scenic beauty. For example, the impact of development and land management outside the National Landscape on views from – and to – the National Landscape is an important consideration, as is the retention of key views.

New support mechanisms for farming, forestry and other land management sectors could impact the conservation and enhancement of the landscape and special qualities of the National Landscape. It could also lead to legislative changes in environmental protection and management impacting on the conservation and enhancement of the National Landscape and its special qualities.

The loss of traditional skills is a significant issue for the future management of the landscape and the special qualities of the National Landscape.

In 2021 the National Landscape Board published [a position statement on landscape-led development](#) supported by [appendices](#).

The CNL is significant for its geology and geomorphology with some features unique to the area. The geology influences the landscape, soils and biodiversity and has played a significant role in the National Landscape's industry and heritage. Survey work has also identified the Cotswolds as significant for tufa streams and springs. It is vital that this geological resource is protected, conserved, enhanced, promoted and better understood.

Policy CE2: Geology and Geomorphology

- CE2.1. Proposals that are likely to impact on the geological and geomorphological features of the Cotswolds National Landscape (CNL) should **seek to further the conservation and enhancement of these features.**
- CE2.2. The geological **and geomorphological** features of the CNL should be conserved and enhanced through effective management.
- CE2.3. Opportunities should be sought to promote awareness and understanding of the geological **and geomorphological** features of the CNL.
- CE2.4. Exploration and research into the geology **and geomorphology** of the CNL should be continued in order to improve understanding of the landscape, and of the geological resource and its importance to inform the conservation and management of geological and geomorphological sites.

Policy CE3: Natural and cultural capital – principles

- CE3. 1. The natural and cultural capital of the Cotswolds National Landscape (CNL), and the services they provide, should continue to be assessed and evaluated.
- CE3. 2. The use of natural and cultural capital accounting should be encouraged in order to fully understand the implications of investment, development and management decisions.
- CE3.3. The financial and non-financial benefits of natural and cultural capital and the services they provide should be promoted.

CE3.4. Proposals affecting the CNL should have regard to – and seek to conserve and enhance – the natural and cultural capital of the CNL and the services they provide.

CE3.5. Natural and cultural capital and the services they provide should be key components of Environmental Land Management and rural development support mechanisms in the CNL.

The CNL has a wealth of natural and cultural capital (the stock of natural and cultural heritage assets) that provide goods and services, often called ecosystem services, that benefit wider society as a whole.

Natural capital stock includes renewable and non-renewable natural resources e.g. geology, minerals, soils, water, air, plants, animals, habitats and ecosystems. The National Landscape's cultural heritage assets are equally rich, including the cultural-historical landscape, individual heritage assets, historic settlements and vibrant cultural activity.

Ecosystem services include; food and fuel provision, the regulation of climate and purification of water, and wellbeing benefits to people through recreation and appreciation of nature.

These assets – and the services that they provide – are of local, national and, for some services, international importance. However, they are not fully understood or valued.

The CNL Board published a Position Statement on '[Conserving and Celebrating Cultural Capital in the Cotswolds AONB](#)' in 2019 and in 2021 the Board published '[A Natural Capital Evaluation of the Cotswolds National Landscape](#)' and a '[Cotswolds Natural Capital Atlas](#)'.

Local distinctiveness

Outcome 4 – Local distinctiveness:

In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.

Policy CE4: Local distinctiveness

CE4.1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape (CNL) should **be compatible with and seek to further the conservation and enhancement** of this local distinctiveness. This should include:

- being compatible with the CNL Board's Landscape Character Assessment, Landscape Strategy and Guidelines, Local Distinctiveness and Landscape Change and **any relevant .. position statement or guidance**.
- being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials and in accordance with design guidance prepared by local planning authorities;
- using an appropriate colour of **Cotswold** limestone to reflect local distinctiveness.

CE4.2. Innovative designs, compatible with the conservation of natural beauty – which are informed by local distinctiveness, character and scale – should be welcomed.

CE4.3. The development of design guidance – which is supported by a robust evidence base and which reflects relevant guidance published by the CNL Board – will be encouraged.

CE4.4. Provision should be made for the quarrying of limestone, at an appropriate scale, in order to provide building materials that help maintain and enhance the local distinctiveness of the National Landscape. Any production of aggregate and agricultural lime should only be as by-product for local use (within the CNL) and only for essential operational purposes, with sufficient material being left to deliver the agreed restoration plan (or a more natural landform) without relying on imported material. Any such mineral sites should be required to demonstrate that they do not have any significant adverse effects on the natural beauty of the National Landscape including its special qualities or the integrity of existing wildlife sites. Where there are multiple quarries in close proximity to each other, consideration should be given to cumulative impacts, including the impact of HGV movements.

As outlined in Chapters 2 and 3, one of the special qualities of the Cotswolds National Landscape is the unifying character of the limestone geology – its visible presence in the

landscape and its use as a building material. Development pressures could potentially erode this local distinctiveness, for example, through the use of inappropriate building materials and inappropriate design. The publication and promotion of design guidance that reflects local distinctiveness is an essential tool for addressing this issue. It will also be important to maintain an adequate supply of locally sourced, appropriately coloured limestone.

Local distinctiveness includes natural elements including but not limited to: woodlands, grasslands, species, the shape and scale of fields, and the character of field boundaries such as hedges and walls. These elements should guide the design of new green and blue infrastructure.

Tranquillity

Outcome 5 – Tranquillity:

Noise pollution and visual disturbance are minimised to maintain tranquillity across the Cotswolds National Landscape.

Policy CE5: Tranquillity

CE5.1. Proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape (CNL) should seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise pollution and other aural and visual disturbance.

CE5.2. Remove and where removal is not possible minimise existing sources of noise pollution and other aural and visual disturbance in order to enhance the tranquillity of the CNL.

CE5.3. Proposals that are likely to impact on the tranquillity of the CNL should have regard to – and be compatible with – the CNL Board’s Tranquillity Position Statement.²³

Research undertaken by CPRE has identified a growing loss of tranquil areas in England, down from 75% of England in the 1960s to around 50% in 2007²⁴. Although the CNL has a relatively

²³ Cotswolds National Landscape Board (2019). [Tranquillity Position Statement](#).

²⁴ CPRE (2007). [Developing an Intrusion Map of England](#)

high level of tranquillity, the CNL is being increasingly affected by unwanted, man-made noise and by activity arising from developments. For example, the increasing demand for air transport is leading to expansion of controlled air space over the CNL. Additionally, the use of drones, both commercially and privately, is likely to increase, further reducing levels of tranquillity.

Tranquillity relates to issues of visual impact and light pollution as well as noise and other disturbance. However, given that Policy CE1 addresses visual impacts and Policy CE5 addresses light pollution, Policy CE4 has an emphasis on noise. This incorporates issues such as significant increases in traffic in the towns, villages and smaller settlements of the CNL, including increased traffic arising from developments outside of the CNL.

The CNL Board published a position statement on tranquillity in 2019.

It is important to note that this policy is not intended to prevent the noise arising from normal working countryside operations such as operating power tools or farm machinery or non-mechanised quiet recreation.

Dark skies

Outcome 6 – Dark skies:

Fewer areas of the Cotswolds National Landscape are affected by light pollution.

Policy CE6: Dark skies

CE6.1. Proposals that are likely to impact on the dark skies of the Cotswolds National Landscape (CNL) should **seek to further the conservation and enhancement of** these dark skies, by seeking to avoid and where avoiding is not possible, minimise light pollution.

CE6.2. Measures should be taken to increase the area of dark skies in the CNL by removing, and where removal is not possible, minimising existing sources of light pollution.

CE6.3. Proposals that are likely to impact on the dark skies of the CNL should have regard to and be compatible with:

- best practice standards and guidance, in particular, that published by the Institution of Lighting Professionals and the Commission for Dark Skies.
- the National Landscapes Board’s Dark Skies & Artificial Light Position Statement.²⁵

CE6.4. Consideration will be given to seeking a formal dark sky designation for those parts of the Cotswolds National Landscape that are least affected by light pollution.

‘Light pollution’ of the night sky is an intrusion into the countryside at night, which can have harmful effects on the health of people and wildlife. Although the CNL has relatively dark skies at night, compared to other parts of England (being ranked 13th in terms of the darkest skies in England), light pollution from the surrounding urban areas and the market towns does adversely affect the darks skies of the CNL in those locations. With ever-increasing levels of new housing in the CNL, light pollution is likely to get worse unless action is taken to address this issue.

²⁵ Cotswolds National Landscape Board (2019). [Tranquillity Position Statement](#).

There are three main forms of light pollution: sky glow, glare and light trespass. It is also important to consider a fourth source of light pollution, which is 'presence'. Even if a lighting scheme were designed that avoided sky glow, trespass and glare, there still exists the possibility of significant residual impacts on dark and sensitive landscapes and wildlife due to the presence of the lights and the illuminance it provides. The CNL Landscape Strategy and Guidelines seeks to address the issue of 'presence' by discouraging the introduction of lit elements into dark, night-time landscapes within the CNL. This is particularly relevant for isolated dwellings in the countryside and for other forms of lighting in isolated locations.

With any lighting installation, the aim should always be: the right light, in the right place at the right time.

The CNL Board adopted and published a [Cotswolds Dark Skies & Artificial Light Position Statement](#) in 2019. It is supported by two appendices:

[Appendix A Cotswolds night lights map.](#)

[Appendix B1 Institution of Lighting Professionals Guidance Note For the reduction of Obtrusive Light.](#)

[Appendix B2 Commission for Dark Skies Good Lighting Guidance.](#)

New Dark Skies Guidance due in the summer and may lead to further changes to the policy and/or supporting text.

Historic environment and cultural heritage

Outcome 7 – Historic environment and cultural heritage:

The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.

Policy CE7: Historic environment and cultural heritage

Consider adding a policy about achieving the target in the national Targets and Outcomes Framework. The indicators for monitoring this target are outlined in appendix 6.

Target 10 **Decrease the number of nationally designated heritage assets at risk in Protected Landscapes.**

CE7.1. Proposals that are likely to impact on the historic environment and cultural heritage of the Cotswolds National Landscape (CNL) should **seek to further the conservation and enhancement of these** heritage assets and their setting. This should include respecting the historical elements of landscape character including features such as; buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape.

CE7.2. Heritage and Cultural Heritage Impact Assessments should be used when considering any change to a heritage asset and to influence decisions regarding the management of the historic environment and cultural heritage assets.

CE7.3. The historic environment and cultural heritage of the CNL, both designated and non-

designated²⁶, should be conserved and enhanced through effective management.

- CE7.4. Designated historic environment sites, such as scheduled monuments and listed buildings, and non-designated heritage assets of equivalent significance, should be protected, in line with national policy and guidance.
- CE7.5. Historic environment and cultural heritage should be a key component of Environmental Land Management and rural development support mechanisms in the CNL.
- CE7.6. Opportunities should be sought to promote the awareness, understanding and use of Historic Environment Records, Conservation Area Appraisals, Historic Landscape Characterisation and Heritage Strategies and Action Plans. These should be used to influence decisions regarding the management of the CNL's historic environment and cultural heritage.
- CE7.7. The cultural heritage of the Cotswolds should be better understood and celebrated in arts, cultural, and social activities across the National Landscape.

Our historic environment and cultural heritage is the result of a complex history of interaction between people and the natural environment. The historic landscape and natural environment form the foundations of our regional identity and local distinctiveness, contributing to the character and natural beauty of the area.

Cultural heritage in the Cotswolds runs deeper than associations made with established examples such as the Arts and Crafts Movement or the music of Vaughan Williams. It is more than how the landscape inspires people. It is intrinsically linked to our understanding of the landscape, the changing seasons, farming, and the natural world. Cultural heritage **includes many intangible elements, for example;** oral history, folklore, superstition, tradition and ritual. Without understanding and celebrating this rich cultural heritage, there is a risk it will be lost, and with it will go a key part of the local identity. **The government is planning to ratify the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage.**

The historic environment is irreplaceable and is continuing to decline and be lost due to development, changes in land management and a lack of understanding and management particularly with regard to the wider historic landscape and the less visible and non-designated sites which have little or no protection. The historic environment also includes historic and cultural features of the wider landscape including but not limited to: field (enclosure) patterns and road and path networks.

If historic buildings go out of use, they become at high risk of dereliction and potentially full loss. It is important to keep historic buildings in use, or adapt them appropriately for re-use wherever possible to prolong their lives and character.

Not all heritage assets have currently been identified and it is likely that heritage assets of equal significance to designated sites such as listed buildings or scheduled monuments may survive within the Cotswolds.

Our historic environment and cultural heritage is the result of a complex history of interaction between people and the natural environment.

²⁶ 'Non-designated' covers the full spectrum of undesignated assets related to the historic environment, for example, ranging from archaeological sites to sites associated with the Arts and Crafts movement of the late 19th and early 20th centuries.

The need to understand and promote the connectivity of historic sites and their settings as part of the wider landscape character is vital in order to effectively conserve and manage the historic environment and Historic Landscape Character²⁷31. Historic Environment Records (HER) of non-designated assets of local significance and Historic Landscape Characterisation (HLC), produced by local authorities need to be better promoted and used by all stakeholders. Historic Landscape Characterisation (HLC) is a method of identification and interpretation of the varying historic character within an area that looks beyond individual heritage assets as it brings together understanding of the whole landscape and townscape into repeating HLC Types. It can be used to help secure good quality, well designed and sustainable places.

Land management, farming practices, wildlife conservation and public access all impact upon the historic environment. Current agri-environment/ELM (Environmental Land Management) schemes have contributed to the management and conservation of historic features such as archaeological remains, registered historic parks and gardens, barns, dew ponds and walls in the wider landscape. It is essential that new support mechanisms will play a significant role in encouraging investment in the National Landscape which conserves and manages the historic environment.

New developments, by virtue of their scale and design, surrounding the historic cores of settlements can cause separation of historic cores from the wider landscape and have a detrimental effect on their distinctive character. The conversion or extension of historic buildings and farmsteads, the introduction of domestic clutter, lighting and landscaping resulting from development can harm the historic character of buildings and their setting, and their relationship to the wider landscape.

Climate change is likely to increase the extremes of wetting and drying, leading to accelerated decay of stonework and an increased risk of subsidence. Increased flooding and erosion may cause damage to buildings and to archaeological sites. Policy CE7 should help to reduce the potential impacts of climate change on the historic environment. Additional measures relating to climate change are provided in Policies CC1 and CC2.

Nature recovery and biodiversity

Outcome 8 – Nature recovery and biodiversity:

There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

Policy CE8: Nature recovery and biodiversity

CE8.1. Biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape (CNL) should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the CNL and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and **Local Nature Recovery Strategies (LNRSs)**, and focus on the priority species and habitats listed in Appendix 7. **The relevant LNRS's are:**

- i. **Gloucestershire** **Add Link when final version published**
- ii. **Oxfordshire** **Add Link when final version published**

²⁷ More information on Historic Landscape Characterisation is available on the [Historic England Website](#)

- iii. [Warwickshire Add Link when final version published](#)
- iv. [West of England Add Link when final version published](#)
- v. [Wiltshire Add Link when final version published](#)
- vi. [Worcestershire Add Link when final version published](#)

CE8.2. Policy and strategic documents that are likely to impact on the biodiversity of the CNL should have regard to the Cotswolds Nature Recovery Plan. This includes but is not limited to, the following:

- i. Local Plans.
- ii. [Local Nature Recovery Strategies](#)
- iii. Neighbourhood Development Plans.
- iv. Green Infrastructure Strategies.
- v. Tree and Woodland Strategies.
- vi. Ecological Emergency and Climate Change Strategies.

CE8.3. Proposals that are likely to impact on the biodiversity of the National Landscape should [seek to further the conservation and enhancement of this biodiversity](#). They should have regard to – and be consistent with – the Cotswolds Nature Recovery Plan [and the relevant Local Nature Recovery Strategies](#). This would include, but is not limited to, the following delivery mechanisms:

- i. Environmental Land Management and other grant schemes and rural development support mechanisms;
- ii. Biodiversity Net Gain;
- iii. Payment for Ecosystem Services including but not limited to carbon sequestration and storage, flood management, water supply and water quality improvements.

CE8.4. Stakeholders should work towards the delivery of the relevant targets for nature recovery within the national Protected Landscapes Targets and Outcomes Framework. The apportioned targets for the Cotswolds to be achieved are:

- Target 1. Restore or create more than **X** hectares of a range of wildlife-rich habitats outside protected sites by 2042 (from a 2022 baseline). [Cotswolds target dependant on coming national apportionment process](#)
- Target 2. 80% Percent of SSSIs in favourable condition by 2042
- Target 3. 60% Percent of SSSIs assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
- Target 4. Continuing favourable management of all existing priority habitat already In favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.
- Target 5. 65% to 80% of land managers adopting nature-friendly farming on at least 10% to 15% of their land by 20230.
- Target 8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

CE8.5. A mitigation hierarchy should be applied to development proposals whereby adverse impacts on biodiversity are: (i) avoided; (ii) mitigated; and (iii) compensated for. Development proposals should provide a net gain in biodiversity of at least 20% particularly with regard to the species and habitats listed in Appendix 7.

CE8.6. Damage or loss of irreplaceable habitat should be avoided. Irreplaceable habitat includes but is not limited to:

- I. Ancient and veteran trees
- II. Ancient woodland (continually wooded since 1600);
- III. Ancient unimproved grassland (surviving since 1945);
- IV. Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840).

This will be reviewed in the light of the outcome of the Defra consultation scheduled for summer 2024

CE8.7. Measures to conserve and restore biodiversity including the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and Local Nature Recovery Strategies should be delivered in a way that is compatible with conserving and enhancing the natural beauty of the Cotswolds National Landscape.

The story of our loss of wildlife is well documented and understood. Climate change is a well-recognised driver combining with habitat destruction to threaten the loss of our already diminished wildlife at an even greater scale and pace. The need for action is urgent if we are to avoid a mass extinction event.

We know what we have to do to allow our wildlife to flourish and adapt to climate change. We need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. [The Cotswolds Nature Recovery Plan](#)²⁸ was adopted as CNL Board guidance in October 2021. It represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change.

The current extent of wildlife rich habitats within the Cotswolds is 48,000 Ha which is 23% of the area of the National Landscape. The extent of these habitats needed to form a robust nature recovery network that will enable wildlife to flourish and adapt to climate change is 82,000 Ha, 40% of the area. The rationale for these figures is outlined in the Cotswolds Nature Recovery Plan and summarised in Appendix 8.

We are entering a new era of collective and resourced action on delivering nature recovery. Now is the time to raise our ambition for what can be achieved. The international obligation that the government has signed up to of 30% of land and sea managed for nature by 2030 is an indication of this ambition.

New statutory Local Nature Recovery Strategies (LNRSs) have been developed which identify and map nature recovery priorities and measures. They are a key tool for driving and directing resources towards the recovery of nature. Biodiversity Net Gain already uses them for targeting and other funders have indicated a willingness to do the same. There are six of these strategies coincident with the Cotswolds and the Cotswolds Nature Recovery Plan has been used to influence their content. They should be followed as a means of delivering the Cotswolds National Recovery Plan.

Supporting LNRS delivery is one of the ways that public authorities including the CNL Board can demonstrate their compliance with the biodiversity duty²⁹ that the Environment Act 2021 introduced. Under this duty they "must consider what they can do to conserve and enhance biodiversity in England."

In return ensuring that the LNRS is compatible with the CNL Management Plan and guidance (including the Cotswolds Nature Recovery Plan) is one of the ways that the accountable bodies

²⁸ Adopted by the Cotswolds National Landscape Board.

²⁹ <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty>

responsible for them can demonstrate compliance with their duty to seek to further the statutory purposes of protected landscapes³⁰.

The national statutory Protected Landscapes Targets and Outcomes Framework (Appendix 6) includes seven targets directly relevant to the recovery of nature in the Cotswolds. These are targets for the place and are owned by all stakeholders. When combined with the duties on public bodies to consider what they can do to conserve and enhance biodiversity and to further the purposes of designation of protected landscapes they will help drive resources to the recovery of nature across the National Landscape. Contributing towards the delivery of the area targets within the national framework will also support the national 30 by 30 target (*subject to national clarification of criteria*).

In the wider countryside agri-environmental programmes are the most important single mechanism for developing a nature recovery network and Environmental Land Management schemes will play a critically important role. It is essential that they include the measures recommended in the Cotswolds Nature Recovery Plan.

Additional funding mechanisms are starting to play an increasingly significant role in supporting the recovery of nature particularly Biodiversity Net Gain as mitigation from development and Payments for Ecosystem Services. Water and carbon collection and storage are becoming increasingly valued as ecosystem services and their importance will continue to grow.

Although the national statutory requirement for net gain in biodiversity arising from development proposals will be 10%, the Cotswolds Nature Recovery Plan states that it should be 20% within the Cotswolds National Landscape. The justification for this enhanced net gain in biodiversity is outlined in appendix 8. This justification includes:

- The Landscapes Review stating that National Landscapes should form the backbone of Nature Recovery Networks
- The Government's response to the Landscapes Review:
- Linking improvements to the way these areas are protected and managed for nature recovery to the commitment to protect 30% of UK land for nature by 2030.
- Stating that they; "will put our protected landscapes at the heart of delivering our nature recovery".

The inclusion of species within the biodiversity net gain policy is aspirational and would take place outside of the formal development plan related biodiversity net gain process.

The priority habitats and species list in Appendix 7 is adapted from Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which lists the habitats and species that are of principal importance for the conservation of biodiversity in England. The habitats and species in appendix 7 are considered to be:

- (i) characteristic of the Cotswolds; and/or
 - (ii) those for which the Cotswolds National Landscape is considered to a stronghold.
- There are other priority habitats and species within the National Landscape, which merit an appropriate level of protection, but which do not meet the two criteria outlined above. Habitats and species not on the NERC Act list but which have been identified, by the National Landscape Board and relevant stakeholders, as priorities for the Cotswolds National Landscape are also included.

the species list will be reviewed when we have more data from the LNRS' process

³⁰ [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://legislation.gov.uk)

The Cotswolds Nature Recovery Plan defines ancient and veteran trees (based on a list of characteristics), ancient woodland (continually wooded since 1600) and ancient grasslands (“unimproved” and predating modern agricultural practices) as irreplaceable habitat. A wildflower grassland present in 1945 at the end of the Second World War is likely to be ancient. This should be taken into account when considering proposals that are likely to impact on them.

Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840) are included as irreplaceable habitat and this should be taken into account when considering proposals that are likely to impact on them because:

- Hedgerows are a priority habitat.
- Hedgerows are a key characteristic/feature of many of the landscape character types within the National Landscapes’s Landscape Character Assessment.
- Ancient hedgerows are an important component of the historic environment and the cultural heritage of the area.

Although Policy CE7 focuses on the National Landscape and its setting, consideration will also need to be given to ecological networks in the wider environment, for example, river corridor ecological networks where the rivers start in the National Landscape but extend well beyond its boundaries.

One of the ways wildlife adapts to climate change is to move northwards to a new ‘climate space’. This means that we need to think about the National Landscape’s future wildlife in addition to that currently present, particularly that currently found to the south of the Cotswolds. Big Chalk is a partnership programme aiming to improve ecological connectivity across and between the calcareous landscapes of southern England from the south coast to the midlands.

Water

Outcome 9 Water

Waterways and bodies of water within the Cotswolds National Landscape have good ecological status.

Policy CE9: Water³¹

CE9.1. Water resources should be carefully managed and conserved to: improve water quality; ensure adequate aquifer recharge; ensure adequate river flows; and contribute to natural flood management systems.

CE9.2. Development (new and existing sites) should assess and minimise flood risk and implement sustainable drainage schemes, adopt high water efficiency standards in line with RIBA 2030 Climate Challenge targets, and water conservation measures, for example rainwater harvesting and/or water recycling and grey water systems.

CE9.4. New development that links to the sewerage system should not be commenced, or

³¹ Water is addressed under Natural Capital and Ecosystem Services, rather than meriting its own section, because it is not a key feature of the special qualities of the National Landscape.

occupied, until the sewerage infrastructure (including the relevant sewage treatment works) has sufficient capacity to cope with the additional load.

CE9.3. Sewerage pollution from storm overflows and phosphate levels during normal operation should be minimised and be at least within legal and regulatory requirements.

CE9.4. Practical measures to improve water quality should be implemented including:

- I. The restoration river and wetland habitats. New wetland habitats could be sited to intercept runoff from roads and reedbeds can be created to filter potentially polluted water from settlements before it is discharged to rivers.
- II. Minimising soil erosion and run off by implementing soil conservation measures.
- III. Minimising pesticide and artificial fertiliser use and implementing measures to reduce pollution from agriculture
- IV. Promote individual measures and behaviours in the home and workplace that protect water volume and quality in rivers.
- V. Citizen science programmes to monitor water quality.

The Cotswolds is home to a large aquifer which supplies water to homes and businesses both inside and outside the Cotswolds National Landscape (CNL). Groundwater sources also need to be carefully managed to ensure the water is safe to use and that abstraction does not impact negatively on river flows.

The rivers in the CNL are important for water supply, recreation and biodiversity. They provide a range of habitats which are reliant on particular water flow and levels. However, some stretches of Cotswold's rivers are already prone to low flows, resulting in damage to riverine habitat, concentration of pollutants and less water for abstraction. Over- abstraction can have a detrimental impact on these factors. Summers are predicted to become drier, which would exacerbate this problem even further.

Around half of the area's groundwater is classed as being of poor quality, particularly in the north and west, due to pollutant inputs. The main sources of pollution are from wastewater treatment works followed by agricultural runoff. Water discharged from wastewater treatment works contains phosphate, nitrogen and ammonia and at times of peak flow raw sewage is discharged directly into rivers. Flood management strategies should aim to avoid these occurrences. Agricultural runoff contains phosphates bound to silt and nitrogen.

The water quality of the CNL's rivers is affected by pollution from various sources include 'run-off' from agricultural land and roads. A significant issue in recent years has been the extent of sewage pollution. To help address this issue, some local authorities have imposed 'Grampian conditions' which prevent housing development (and other development that requires a connection to the sewerage system) from being occupied until the sewerage infrastructure has capacity to deal with the additional load.

The water in the CNL is mainly fed by flow from deep in the limestone aquifers. The Environment Agency has been establishing projects within the CNL to improve the ecological condition of the rivers. Catchment Management Plans (CMP) provide the actions needed to achieve good ecological condition. Water Framework Directive data for 2016 indicates that 35% of the monitored river lengths in the National Landscape are in good ecological condition. Since 2013

there has been a decrease in the length of river in poor ecological condition.³² There are concerns with phosphate and sediment levels in some watercourses and groundwater supplies.

The CNL is not, at present, an area widely prone to flooding. However, in extreme rainfall events, such as that of July 2007, some towns and villages have been affected by flooding from rivers or as a result of limited drainage. Climate change is likely to increase the risk of flooding and the frequency of such extreme rainfall events.

The rivers that originate in the CNL flow downstream through larger towns and villages outside of the National Landscape which are more prone to flooding. As such, land management in the river valleys of the National Landscape can play a key role in helping to reduce flood risk downstream. Natural flood management works with natural processes to 'slow the flow' of flood waters. This helps to reduce the maximum water height of a flood (the 'flood peak') and/or delay the arrival of the flood peak downstream, increasing the time available to prepare for floods. Sustainable drainage systems, and ecological river restoration projects are important components of natural flood management.

With the anticipated drier summers and wetter winters, there is likely to be an increased demand for rainwater harvesting and storage.

Rural land management

Outcome 10 – Rural land management:

Land management conserves and enhances the natural beauty of the Cotswolds National Landscape whilst balancing the competing pressures of recovering nature, tackling climate change, food production, supporting livelihoods and public access.

Policy CE10: Rural land management

CE10.1. Rural land management in the Cotswolds National Landscape (CNL) and in the setting of the CNL should **seek to further** the conservation and enhancement of the natural beauty of the CNL including its special qualities. It should also help increase the understanding and enjoyment of the CNL's special qualities.

CE10.2. Rural land management in the CNL and in the setting of the CNL should have regard to – and, ideally, help to deliver – the CNL Management Plan. It should also be compatible with guidance produced by the CNL Board, including the:

- i. CNL – Landscape Strategy and Guidelines
- ii. CNL – Landscape Character Assessment
- iii. CNL Local Distinctiveness and Landscape Change
- iv. CNL Board Position Statements
- v. Cotswolds Nature Recovery Plan
- vi. CNL Climate Change Strategy

CE10.3. Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape should be designed specifically for the CNL. These mechanisms should:

- i. address paragraphs 1 and 2, above

³² Cotswolds National Landscape Board (2017). [State of the Cotswolds](#)

- ii. be managed locally to ensure effective local delivery
- iii. deliver public goods and services

The two main aspects of rural land management are farming and woodland management.

The CNL is a farmed landscape and its landscape largely a product of farming. 87% of land in the CNL is agricultural land, 49% of which is arable and 43% grassland³³. Farming is worth around £800 million annually to the National Landscape's economy, and in turn provides the landscape which supports the Cotswolds tourism industry (annually worth around £1 billion).

Farming has an essential role to play in nature recovery as many of the distinctive Cotswold habitats are a result of farming activity, and farming operations such as grazing are necessary to manage and restore them.

Sustainable and regenerative farming practices have an important role to play in delivering multiple environmental objectives whilst simultaneously producing food.

Changes in farming practices, linked to changes in farming policy and the economy of particular crops and livestock, can potentially lead to changes in the landscape of the CNL and affect its natural beauty and special qualities, including farmland biodiversity. Changing farming economics, demographics, practices and rural business diversification result in the decline of small mixed farming units and create clusters of land uses which have a detrimental impact upon the landscape such as horse paddocks and 'gentrification'.

Bringing woodlands back into management is a priority. Lack of management is due to many factors, but especially due to the loss of appropriate markets for woodland products. Woodland planting should consider its impacts on the landscape setting and, in particular, its effects on the open views that people enjoy from viewpoints, roads and Public Rights of Way. 'Right Tree, Right Place, Right Reason' principles should be applied when planting trees. For example, the planting of 'privacy belts' around property is having a detrimental impact on landscape character and views, particularly from roads. Often inappropriate, fast-growing species are selected and strategies to encourage more appropriate species should be found. In some instances, tree planting that is implemented to mitigate the visual impact of new development can also adversely affect landscape character. Issues relating to landscape character are addressed under Policy CE1 (Landscape). Also, the creation of new woodland should occur where it best meets the objectives of the Nature Recovery Network and it should be appropriately managed. Opportunities for natural regeneration should be looked for in concert with opportunities for planting to assist this process.

Farming, woodland management and other rural land management practices that make a positive contribution to conserving and enhancing the natural beauty of the National Landscape have been largely reliant on payments from agri-environment schemes. It is critical that

Environmental Land Management Schemes maintain and build on what has been achieved to date. In addition, payments for carbon sequestration, nature recovery and ecosystem services are areas that will grow.

Climate change is likely to result in an increase in crop and grass yields, but with a greater variability in quantity and quality, including crop failure. New management methods and new

³³ Cotswolds National Landscape Board (2015). [Farming, Forestry and the Equestrian Sector in the Cotswolds AONB, Update](#)

varieties are likely to be adopted in response to warmer, drier conditions. The area of energy crops and novel crops is likely to increase. The overall area of grassland is not expected to change significantly, but management may become more extensive. With regards to forestry, increased timber and biomass production can be expected, but with a reduction in quality. Some species, such as oak, are expected to fare better than others such as beech. Land management practices, together with Environmental Land Management and rural development support mechanisms, will need to encompass and deliver climate change mitigation and adaptation measures appropriate to the National Landscape. Relevant measures to mitigate and adapt to the impacts of climate change, in relation to rural land management, are outlined elsewhere in this Management Plan, notably in policies CC1 and CC2.

Increasing the emphasis on farming possibly through a new title is being considered in the light of recent feedback.

Policy CE11: Problem species³⁴, pests and diseases

CE11.1. The population of grey squirrel and deer in the Cotswolds National Landscape (CNL) should continue to be controlled and managed. This should be undertaken and coordinated at a landscape scale.

CE11.2. National guidance – and guidance produced by the CNL Board – on Ash Dieback should be followed to ensure any measures implemented will conserve and enhance the qualities of the landscape.

CE11.3. National and local guidance – including guidance from Government Agencies and the Non-Native Species Secretariat – on invasive non-native species, pests and diseases should be followed and appropriate biosecurity measures promoted.

Increasing deer and grey squirrel populations and lack of coordinated management is having an adverse impact on the landscape of the CNL and on the quality of woodland, woodland biodiversity and timber. There is a need for more deer management groups.

There is an increasing prevalence of tree pests and diseases resulting from climate change, increased global trade, travel and the importation of diseased material. In particular, Ash Dieback will have an increasing impact on woodland and trees in the landscape during the life of the Management Plan.

There are a number of invasive non-native species present in the CNL that are having a harmful impact, particularly on biodiversity. These include Himalayan Balsam and New Zealand Pygmy Weed in rivers and ponds, and Holm oak and Cotoneaster on species rich grassland. Driven by climate change and globalisation, there is an increasing risk of further plant and animal pests and disease becoming established in the CNL and having a harmful impact on landscape, biodiversity and the economy.

Policy CE12: Soils

CE12.1. Soil degradation should be halted and reversed by managing soils in a way that: (i) increases organic content, water retention and carbon sequestration; and (ii) minimises erosion, water pollution and compaction.

³⁴ These species are not addressed in the Biodiversity section as they are not species that we are aiming to conserve and enhance (see Appendix 7).

CE12.2. Soil management should remain a key component of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape (CNL).

Across the CNL there are many different soil types, which are subject to degradation from a variety of factors. Loss of soil organic matter results in soils being more prone to drought and less resilient, and requiring higher levels of input to support yields. This, in turn, leads to compaction of soils and the leaching of nitrate and pesticides to groundwater.

With a predicted 22% decrease in summer rainfall by 2080, the free draining Cotswold soils will become more prone to drought. Extreme weather events and a predicted 22% overall increase in winter rainfall could lead to flooding and poaching of soils³⁵. These combined impacts would lead to soil damage, erosion and nutrient loss. Soil management practices will, therefore, become even more important.

Development and transport

Outcome 11 – Development and transport:

Development and transport schemes positively contribute to the purposes of protected landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.

Policy CE13: Development and transport – principles

CE13.1. Development and transport proposals in the Cotswolds National Landscape (CNL) and its setting should **seek to further the conservation and enhancement of the natural beauty of the CNL**. In doing so, they should have regard to – and be compatible with the CNL Management Plan and guidance produced by the CNL Board, including the:

- (i) CNL – Landscape Strategy and Guidelines
- (ii) CNL – Landscape Character Assessment
- (iii) Cotswolds Nature Recovery Plan
- (iv) CNL - Local Distinctiveness and Landscape Change
- (v) CNL Board Position Statements

CE13.2. Development and transport proposals in the CNL should **seek to further the** purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social wellbeing of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.

CE13.3. Development and transport proposals in the CNL and its setting should comply with relevant national planning policy and guidance, particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that relate to AONBs.

CE13.4. The purposes of conserving and enhancing the natural beauty of the CNL and increasing the understanding and enjoyment of the CNL special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport

³⁵ Cotswolds National Landscape Board (2022). [Climate Change Strategy](#)

Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the CNL Management Plan as a material consideration.

CE13.5. The cumulative impacts of development proposals on the natural beauty of the CNL should be fully assessed.

CE13.6. A landscape-led approach should be applied to development and transport proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals:

- a) address the natural beauty of the CNL as primary consideration at all stages of the development process (including design), from initial conception through to implementation
- b) address all of the factors that contribute to the natural beauty of the area
- c) address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure
- d) reflect and enhance the character of the local area
- e) avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them
- f) seek opportunities to enhance the natural beauty of the CNL and
- g) deliver substantially more beneficial effects than adverse effects for the natural beauty of the CNL.³⁶

This landscape-led approach is particularly important for major development³⁷.

This policy provides principles relating specifically to development and transport. However, it is important to note that development and transport proposals should have regard to the Management Plan policies as a whole. For example, **Policy CE8 (Nature Recovery and Biodiversity), paragraph 5**, relating to biodiversity net gain, would be a key consideration in development proposals.

Policy **CE13** refers to relevant sections of the National Planning Policy Framework (NPPF) for context, as this national policy underpins much of what Policy **CE13** is seeking to achieve. However, Policy **CE13** expands on this national policy by referencing relevant case law and best practice.

Planning legislation and policy affords the highest level of protection to National Landscapes in relation to landscape and scenic beauty – the same level of protection as for National Parks. Although some level of development may be required to meet local (CNL) housing needs and to ensure that the vitality of CNL settlements is maintained and enhanced, development should not be at such scale that either individually or cumulatively, it erodes the special qualities of the CNL. This would undermine the reason for the Cotswolds being designated as national landscape in the first place.

With regards to cumulative impacts, a particularly important consideration is where multiple, separate developments have been implemented or proposed in the same locality. Individually, they might not be particularly significant. However, collectively, their impacts could be significant.

³⁶ This was a design principle for the A417 Missing Link Scheme – see Case Study 3 in [Appendix 1](#) of the Board's [Landscape-led Development Position Statement](#) for further details.

³⁷ 'Major development', in this context, equates to the definition provided in Footnote 60 of the [NPPF](#). See also Policy CE11.

In planning decisions, national landscape considerations will need to be weighted in the overall planning balance alongside other relevant considerations. In line with national planning policy, great weight should be given to conserving and enhancing the natural beauty of the CNL. It is worth noting that case law has clarified that this great weight should also be applied in relation to the impact of development outside a national landscape on views from the national landscape. (i.e. development in the setting of the national landscape). More information on this issue is provided in the Board's position statement on Development in the Setting of the Cotswolds AONB.³⁸

The factors that contribute to natural beauty include landscape quality/beauty, scenic quality/beauty, relative tranquillity (including dark skies), relative wildness, natural heritage (including biodiversity) and cultural heritage (including historic environment). These factors derive from Natural England's 'Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England'³⁹. The 'special qualities' of the CNL are a key component of the area's natural beauty.

Increasing traffic volume and vehicle sizes on the National Landscape's roads can lead to congestion, noise and air pollution, damage to roadside verges (with consequent drainage and soil erosion issues), reduced safety for non-motorised road users and traffic 'rat-running' along minor roads and through villages. Measures to address these issues should be integral considerations in new developments and can include lowering speed limits, the provision of suitably designed speed reduction schemes, the provision of off-road routes for non-motorised users and the provision of appropriate signage. In line with the recommendations in the Board's Tranquillity Position Statement, if a development proposal would increase in traffic movements (or HGV movements) by 10% or more, this should, as a 'rule of thumb', be considered significant in terms of impact on tranquillity.⁴⁰

The distinctive character of minor roads reflects and contributes to the character of the wider CNL and these roads are an important means for people to experience the CNL. Insensitive, over-engineered road schemes and excessive lighting can have a detrimental impact. Impacts on landscape character are addressed in Policy CE1 (Landscape).

Further information on what is meant by a landscape-led approach to development is provided in the Board's 'Landscape-led Development Position Statement'.⁴¹ Appendix 3 of the Position Statement specifically addresses landscape-led principles for major development.

Policy CE14: Major development

CE14.1. In line with national planning policy, permission should be refused for major development within the Cotswolds National Landscape (CNL), in the context of paragraph 183 of the National Planning Policy Framework (NPPF), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.⁴²

CE14.2. Relevant stakeholders should fully assess relevant site allocations and development

³⁸ Cotswolds National Landscape Board (2017) [Development in the Setting of the Cotswolds AONB](#)

³⁹ Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England](#) (see Table 3 and Appendix 1).

⁴⁰ Cotswolds National Landscape Board (2019) [Tranquillity Position Statement](#) (see Section 4.5).

⁴¹ Cotswolds National Landscape Board (2021) [Landscape-led Development Position Statement](#) and [appendices](#).

⁴² Paragraph 177 of the [NPPF](#)

proposals to see if they constitute major development. In considering or deciding whether a proposed development constitutes major development, relevant stakeholders should have regard to the major development checklist in Appendix 5 of the Board's Landscape-led Development Position Statement.⁴³

CE14.3. Local authorities and other relevant stakeholders should explicitly state whether they consider relevant allocations and development proposals⁴⁴ to be major development.

CE14.4. The mandatory major development 'tests' specified in paragraph 183 of the NPPF should be rigorously applied and documented for all allocations and development proposals that are deemed to be major development.

CE14.5. When relevant stakeholders are considering or applying the major development 'tests' specified in paragraph 183 of the NPPF, it should be recognised that:

- 'exceptional need' does not necessarily equate to 'exceptional circumstances';⁴⁵
- no permission should be given for major development save to the extent the development was needed in the public interest, met a need that could not be addressed elsewhere or in some other way and met that need in a way that to the extent possible, moderated detrimental effect on the environment, landscape and recreational opportunities.⁴⁶

CE14. 6. When making decisions on major development proposals, local authorities (and/or other relevant decision makers) should not simply weigh all material considerations in a balance, but should refuse an application unless they meet the exceptional circumstances and public interest criteria.⁴⁷

As with Policy CE13, Policy CE14 refers to relevant sections of the National Planning Policy (NPPF) for context, as this national policy underpins much of what Policy CE13 is seeking to achieve. However, Policy CE14 expands on this national policy by referencing relevant case law and best practice.

Paragraph 183 of the NPPF states that '*when considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, 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*'. Footnote 64 of the NPPF explains that 'whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined' (footnote 64). This definition of major development differs from the definition in [The Town and Country Planning \(Development](#)

⁴³ Cotswolds National Landscape Board (2021) [Landscape-led Development Position Statement](#) and [appendices](#).

⁴⁴ There are examples of case law where planning permissions have been quashed because the local authority (specifically, the planning committee) did not explicitly address the issue of major development and the related issue of 'exceptional circumstances' (e.g. [R \(Mevagissey Parish Council\) v Cornwall Council \[2013\] EHC3684 \(Admin\)](#)).

⁴⁵ [R \(Advearse\) v Dorset Council v Hallam Land Management Ltd \[2020\] EWHC 807](#). Direct quote from paragraph 35

⁴⁶ [R \(Mevagissey Parish Council\) v Cornwall Council \[2013\] EHC 3684 \(Admin\)](#), paragraph 51: 'The planning committee are required, not simply to weigh all material considerations in a balance, but to refuse an application unless they are satisfied that...'

⁴⁷ [R \(Mevagissey Parish Council\) v Cornwall Council \[2013\] EHC 3684 \(Admin\)](#), paragraph 51: 'The planning committee are required, not simply to weigh all material considerations in a balance, but to refuse an application unless they are satisfied that...'

[Management Procedure\) \(England\) Order 2015](#) (or 'DMP' for short), albeit that DMP definition is still a relevant consideration in relation to footnote 60 of the NPPF.

Paragraph 183 of the NPPF specifically addresses the issue of major development in the context of planning permissions (i.e., as part of the development management process). However, legal opinion has stated that 'it would arguably amount to an error of law to fail to consider [paragraph 177] at the site allocations stage of plan making... The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF'⁴⁸. As such, it is appropriate to address the issue of major development at the plan making stage as well as at the development management stage.

The 'Assessment of Site Allocations Against Major Development Considerations' undertaken by the South Downs National Park Authority in 2015⁴⁹ and 2017⁵⁰ as part of their Local Plan process is an excellent case study in this regard.

The major development checklist in the Board's Landscape-led Development Position Statement is not intended to set rigid criteria. Instead, it is intended to help guide the decision maker (and other stakeholders) through the process of assessing if a proposed development constitutes major development.

Due to their scale, major infrastructure and development projects, such as roads or energy developments, are likely to have a more significant impact on the natural beauty of the CNL than smaller-scale developments. There is an even stronger need for these projects to be exemplars for how they have regard to the conservation and enhancement of the natural beauty of the CNL including its special qualities.

Further guidance regarding major development is provided in Appendix 9 of the Management Plan and in Section 7.3, Appendix 3 and Appendix 5 of the Board's Landscape-led Development Position Statement.⁵¹

Policy CE15: Development priorities and evidence of need

CE15.1. Housing delivery in the Cotswolds National Landscape (CNL) should be focused on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.⁵²

CE15.2. When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies for affordable housing provision in the CNL that require:

- at least 50% affordable housing in market housing developments
- 100% affordable housing on Rural Exception Sites, with a lower percentage only

⁴⁸ Landmark Chambers (2017) [In the matter of the South Downs National Park and in the matter of paragraph 116 of the NPPF](#) (see paragraph 5).

⁴⁹ South Downs National Park Authority (2015) [South Downs Local Plan Preferred Options: Assessment of Site Allocations Against Major Development Considerations – Technical Report](#).

⁵⁰ South Downs National Park Authority (2017) [South Downs Local Plan Pre-Submission: Assessment of Site Allocations Against Major Development Considerations – Technical Report](#).

⁵¹ Cotswolds National Landscape Board (2021) Landscape-led Development Position Statement and appendices.

⁵² Sections 5.4 and 5.5 of the [Board's Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

being permitted in exceptional circumstances and the absolute minimum being 75%

- on-site affordable housing provision for housing developments of five units or fewer

CE15.3. Priority should be given to maintaining and enhancing local community amenities and services and improving access to these amenities and services. Priority should also be given to supporting local employment opportunities.⁵³

CE15.4. It should be recognised that:

- a) The housing need figure derived from the Government's 'standard method' for calculating housing need is an unconstrained assessment of housing need⁵⁴ and does not present a target for housing provision.⁵⁵
- b) The decision on how many homes should be planned for (i.e., the 'housing requirement' figure in Local Plans) should only be made after consideration of the constraints that the local authority faces, including the AONB designation, and consideration of the land that is actually available for development.⁵⁶ As such, when these constraints are factored in, the 'housing requirement' could potentially be smaller than the standard method's 'housing need' figure.
- c) The application of national planning policies relating to national landscapes may mean that it is not possible to meet objectively assessed needs (OAN) in full in local authority areas that overlap with the CNL.⁵⁷
- (d) The CNL is unlikely to be a suitable area for accommodating unmet needs from adjoining, non-designated areas.⁵⁸ In the context of the CNL, this includes unmet needs relating to adjacent urban areas and unmet needs arising in local authority areas that do not overlap with the CNL.
- (e) Meeting housing need is never a reason to cause unacceptable harm to the CNL.⁵⁹
- (f) The scale and extent of development in the CNL should be limited.⁶⁰

CE15.5. Consideration should be given to whether the constraints relating to the national

⁵³ Sections 5.4 and 5.5 of the Board's Housing Position Statement and appendices provide additional context on this issue.

⁵⁴ UK Government (2020) [Guidance on Housing and economic needs assessment](#). Paragraph 001.

⁵⁵ Government response to the local housing need proposals (2021) in "[Changes to the current planning system - Proposed changes to the standard method for assessing local housing need](#)".

⁵⁶ See previous footnote. The issue of how constraints should be addressed is also covered in the Government's [guidance on Housing and Economic Land Availability Assessment](#). Key extracts from this guidance are provided in Appendix 1 of the [Board's Housing Position Statement](#) and [appendices](#).

⁵⁷ [Government Guidance on the Natural Environment](#). Paragraph 041

⁵⁸ See previous footnote. Section 5.3 of the [Board's Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

⁵⁹ Government response to the local housing need proposals (2021) in "Changes to the current planning system - Proposed changes to the standard method for assessing local housing need" Paragraph 61 of the National Planning Policy Framework now clarifies that the standard method figure is just an advisory starting point. In relation to the revised paragraph 61 of the NPPF, the Secretary of State, Michael Gove, stated, in a speech in December 2023, that '*local authorities have the comfort of knowing that they need not ...sacrifice protected landscapes to meet housing needs*'.

⁶⁰ Ministry of Housing, Communities and Local Government (2021) [National Planning Policy Framework \(NPPF\)](#). Paragraph 176.

landscape designation merit ‘exceptional circumstances’ which may justify using an alternative approach to the standard method for assessing housing need.⁶¹

CE15.6. When the allocation of sites is being considered in the Local Plan process, regard should be given to the evidence of need specific to: (i) the settlement/parish where the allocation is being proposed; and (ii) the CNL ‘sub-area’ within which the allocation is being proposed.

CE15.7. Within the CNL, windfall housing proposals on undeveloped land adjoining, or outside of, built up area boundaries (or equivalent) should only be supported where there is robust evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement.

CE15.8. Where choice-based lettings systems, such as Homeseeker Plus, are used as part of the evidence base for affordable housing need:⁶²

- the ‘local connection’ component of the choice-based lettings system should be applied consistently; and
- data from the choice-based lettings systems should not be used explicitly as a measure of affordable housing need unless the data has been verified and there is a clear local connection to – and preference for – the settlement in question.

CE15.9. When local authorities are reviewing their Local Plans, they should give consideration to setting policies that ensure that new market housing is used as a principal residence rather than as a second home or holiday home.

The CNL is a living and working landscape in which the social and economic wellbeing of local communities is an important consideration. Maintaining vibrant and thriving local communities is essential to the long-term future of the CNL. The provision of housing and services that meets local needs plays an important role in achieving these aspirations. However, these aspirations should be delivered in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the CNL.

With regards to paragraphs 1 to 3 of Policy CE15, Government guidance recognises that national parks are not suitable locations for unrestricted housing. Instead, *‘the expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services’*. The same guidance requires national park authorities to work to *‘ensure that... affordable housing remains so in the longer term’*.⁶³ National landscapes have the same level of protection as national parks, with regards to conserving and enhancing landscape and scenic beauty, and the scale and extent of development in both designations should be limited.⁶⁴ As such, it is logical to apply the same principles, outlined above for national parks, in national landscapes as well.

⁶¹ Paragraph 61 of the [NPPF](#) recognises that there may be exceptional circumstances that justify an alternative approach to the ‘standard method’, albeit that this alternative approach would still have to reflect current and future demographic trends and market signals.

⁶² Sections 5.6 and 5.10 of the [Board’s Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

⁶³ Defra (2010). [English National Parks and the Broads – UK Government Vision and Circular 2010](#), Paragraphs 78 and 79.

⁶⁴ Ministry of Housing, Communities and Local Government (2021) [National Planning Policy Framework](#). Paragraph 176.

The targets in paragraph 2 of the Policy CE15 are based on what the Board would consider to be best practice within other protected landscapes. The Board acknowledges that these aspirations might exceed current policy in Local Plans. However, we consider that they are appropriate targets to aim for in a protected landscape, where the main focus for housing provision should be the provision of affordable housing. We acknowledge that these targets would be subject to viability assessments.

Paragraph 35 of the NPPF states that, in order to be sound, Local Plans should 'as a minimum, seek to meet the area's objectively assessed needs' (OAN). However, paragraph 11 of the NPPF allows for circumstances in which the OAN might not be met in full, including with regards to NPPF policies that relate to national landscapes. Government guidance explicitly states that the application of policies in the NPPF relating to the protection of national landscapes '*may mean that it is not possible to meet objectively assessed needs in full through the plan-making process*'.⁶⁵ As such, it should be recognised that, in some circumstances, it might be appropriate for the housing requirement figure identified in development plans (that overlap with national landscapes) to be less than the OAN figure.

With regards to paragraph 6 of Policy CE15, the lack of a specific housing need figure, or housing requirement figure, for the AONB 'sub-area' within which an allocation is being considered could potentially make the allocation (and the Plan) unsound. This was the case in West Oxfordshire, where the Local Plan inspector concluded that '*in the absence of a housing need figure for the Burford – Charlbury sub-area... the allocation in the plan of housing sites, and the reliance on additional windfall housing development, in the Burford – Charlbury area, over and above existing completions and commitments, would not be sound*'.⁶⁶

The wording of paragraph 7 of Policy CE15 is based on paragraph 5.39 of the West Oxfordshire Local Plan, which states that: '*Within the Cotswolds AONB, windfall housing proposals on undeveloped land adjoining built up areas... will only be supported where there is convincing evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement, for example through a rural exception site*'.⁶⁷

There is concern that second home ownership, retirement homes and buy to let have removed housing from the market that could otherwise be made available to first home owners. This results in increased demand within a reduced pool of housing stock, which inflates house prices and makes housing less affordable. The Board is particularly concerned that those who care for the landscape of the National Landscape and other key workers have an opportunity to live within it.

All of these issues, including relevant case studies, are addressed in more detail in the Board's Housing Position Statement. The recommendations in the Housing Position Statement are based on government guidance and on best practice in the Cotswolds and other protected landscapes. Many of these recommendations have now been incorporated into Policy CE15, although the Position Statement provides additional, useful context.⁶⁸

Policy CE16: Waste management and the circular economy

⁶⁵ Government Guidance on the Natural Environment. Paragraph 041.

⁶⁶ Planning Inspectorate (2018) [Report on the Examination of the West Oxfordshire Local Plan 2031](#). Paragraph 219.

⁶⁷ West Oxfordshire District Council (2018). [West Oxfordshire Local Plan 2031](#).

⁶⁸ Cotswolds National Landscape Board (2021). [Housing Position Statement](#) and [appendices](#).

- CE16.1. Waste management should align with the following hierarchy, as set out in the Government's Waste Management Plan 2021:
- a. Prevention
 - b. Prepare for reuse
 - c. Recycling
 - d. Other recovery
 - e. Disposal
- CE16.2. Measures that help to deliver a circular, or closed-loop, economy, in which waste generation is avoided, should be encouraged.
- CE16.3. Proposals for new landfill sites and strategic waste facilities should not normally be permitted in the Cotswolds National Landscape (CNL), especially where they involve importing significant amounts of waste into the CNL (for example, waste generated in neighbouring urban areas).
- CE16.4. Any waste management facilities that are permitted in the CNL should:
- (i) be sited in such a way that adverse environmental impacts are minimised, in line with relevant permitting regimes; and
 - (ii) be primarily to receive waste that arises within the CNL (within close proximity to the proposed facility).
- CE16.5. The management or use of waste by way of depositing it to land as an inert 'recovery' operation, land raising and bunding or for further restoration of previous landfill operations, should only be allowed: (i) in very limited circumstances within environmental limits; (ii) where it can demonstrate a significant net-benefit for the conservation and enhancement of the natural beauty of the CNL; and (iii) where it complies with the policies of the relevant Waste Local Plan and relevant environmental regulations.

Communities and businesses within the Cotswolds produce a significant amount of waste which needs to be disposed of in an appropriate and safe manner. In future, efforts must concentrate on minimising waste and dealing with it in close proximity to where it is produced. The reduction of waste should be promoted by supporting policies and plans which result in re-use, reduction and recycling of waste materials and the efficient and effective collection of waste in a manner that will support its management as high up the waste hierarchy as is practicably possible.

Proposed activities including development, should proactively support the transition to a circular economy throughout the CNL. They should apply waste avoidance and reduction practices and adopt procurement strategies that favour the purchase of goods and services, which contribute to closing energy and material loops within supply chains.

The significant number of urban areas close to the CNL has the potential to create pressure to import waste into the CNL, particularly to former quarry locations. This can generate additional lorry traffic within the National Landscape, with associated negative impacts on communities, the rural road network and roadside verges. There are also implications for the groundwater resource due to the permeable nature of limestone.

Infilling with inert waste is sometimes proposed for quarries within the CNL. The need for infilling should be minimised by ensuring that a sufficient quantity of by-product is retained during the quarry operation to enable an appropriate restoration scheme to be achieved. Retrospective infilling may require a considerable number of HGV movements which can adversely affect the tranquillity of the CNL and result in unnecessary greenhouse gas emissions. As such, the potential benefits of restoring a former quarry to a more natural landform will need to be weighed in the balance against these potential adverse effects.

7. Increasing understanding and enjoyment

Ensuring access, learning and wellbeing opportunities are for everyone.

Health and wellbeing

Outcome 12 – Health and wellbeing:

The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.

Policy UE1: Health and wellbeing

- UE1.1. Opportunities for improving health and wellbeing in the Cotswolds National Landscape (CNL) should be created, improved and promoted, including, where appropriate, the provision of: green spaces or water within easy reach of communities; walking, cycling and riding routes, including routes for disabled people; opportunities to access and interact with nature; and volunteering and personal development opportunities.
- UE1.2. Children and young people resident within and around the CNL should be provided with environmental education opportunities to experience the CNL through direct contact with the natural environment.
- UE1.3. The health sector should make greater use of the benefits that the National Landscape provides for the health and wellbeing of residents and visitors, for example, by prescribing exercise in the CNL countryside.

A lack of physical activity can lead to a variety of chronic diseases and conditions such as obesity, diabetes and heart disease which, combined with an ageing population, is contributing to a public health crisis. A lack of access to scenic, wildlife- rich green space and other open spaces can also adversely affect mental health. Many people, particularly children and young people, do not readily have opportunities to learn about the environment or to develop an understanding and appreciation of the Cotswolds countryside.

The health and wellbeing benefits of volunteering in the countryside cannot be underestimated. Volunteering helps to improve physical health, and working and walking in the outdoors can also help with a variety of mental health challenges such as social isolation, bereavement and low confidence and self- esteem. The variety of opportunities available across the National Landscape and wider partnership of organisations needs to be more clearly signposted.

There is a need to implement and develop a variety of approaches to address these issues, including the provision of outdoor activities and experiences. There is also a need to promote the link between physical and mental health and enjoying and understanding the special qualities of the National Landscape. This should include encouraging more partnership working between health professionals and other stakeholders to implement measures such as 'green' prescriptions (for example, prescribing walks in the CNL). Where appropriate, links should be developed between these health and wellbeing aspirations and the enhancement of ecological networks and the provision of green infrastructure

Access and recreation

Outcome 13 – Access and recreation:

The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.

Add a policy about achieving the targets in the national Targets and Outcomes Framework. The indicators for monitoring this target are outlined in appendix 6.

Target 9 Improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme.

Policy UE2: Access and recreation

- UE2.1. A safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way network should be maintained, enhanced and promoted across the Cotswolds National Landscape (CNL).
- UE2.2. Improvements to rights of way should be undertaken in a way that minimises any adverse effects on and seeks to further the conservation and enhancement of the natural beauty of CNL and on its special qualities. Innovative ways of providing named routes without introducing additional signage should be explored.
- UE2.3. Open Access Land and other land including Country Parks, that is open to public access⁶⁹ should be maintained, enhanced and promoted across the CNL. Where appropriate, more land should be made available for public access.
- UE2.4. Sustainable funding for National Trails, including the Cotswold Way and Thames Path, should be secured.
- UE2.5. Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the CNL.
- UE2.6. A priority for engagement in the CNL should be individuals who are not currently enjoying or engaged with the benefits of the landscape. Particularly those from within the CNL and from the surrounding urban areas, especially those from areas of high deprivation and those that are not traditional visitors to the Cotswolds.
- UE2.7. Easily accessible online, downloadable and onsite resources for walking, cycling, horse riding, volunteering and educational activities should be provided in the CNL to help promote access to the area and understanding and appreciation of its special qualities.
- UE2.8. Visitor facilities and routes that are accessible to those of all abilities should be provided.
- UE2.9. Guided walks and activities for those who are not confident walking in the countryside

⁶⁹ This includes access land under the Countryside and Rights of Way Act 2000 (which includes commons) and where public access is permitted on land managed by landowners, non-government organisations and charities such as the National Trust, the Wildlife Trusts and the Woodland Trust.

should be provided to increase confidence and share knowledge of the CNL and its special qualities.

UE2.10. Arts and cultural experiences should be provided to encourage people to deepen their emotional connection to the landscape and support the engagement of new and existing audiences.

UE2.11. The Countryside Code should be promoted to educate visitors and communities to act appropriately in the countryside and to improve understanding between visitors and those living and working in the area.

UE2.12. The provision of new, and level of use of existing, access and recreational opportunities should not have a significant adverse impact on the CNL. Where recreational use is having or is likely to have, an adverse impact on the special qualities of the National Landscape or on the integrity of existing wildlife sites, steps should be taken to evaluate, prevent or mitigate these impacts. Such steps can include enhanced maintenance and wayfinding, onsite engagement, legal restrictions, and the provision and promotion of access and recreational opportunities in new alternative suitable locations.

UE2.13. Where irreconcilable conflicts exist between conservation and public enjoyment in the CNL, then conservation interest should take priority.

The use of the term “everyone” within the wording of this outcome is deliberate and is intended to promote equality, diversity and inclusion.

The extensive 3000 miles of public rights of way network provides a huge opportunity to enhance public enjoyment and appreciation of the CNL. For some people, due to financial, health or cultural reasons there are barriers to accessing and enjoying this network. These barriers should be broken down and access provision should be adapted and extended where possible to reach the widest demographic and people of all abilities

The Landscapes Review published by Julian Glover in 2019 challenged Protected Landscapes to do more to welcome people, and to do a lot more to ensure that people from currently underrepresented groups can enjoy the benefits of accessing them too.

Partners including the National Landscape Board, Highway Authorities, parishes and landowners should work together to improve rights of way furniture, surfacing and facilities for the benefit of everyone.

Digital platforms such as websites and social media should be used, alongside targeted communications in more difficult to reach communities to promote the extensive guided walks and guided walks programme that will appeal to a variety of audiences.

Offering high quality arts and cultural experiences which encourage people to deepen their emotional connection to the landscape will be an important part of how new and existing audiences are engaged in the future. Weaving

thought-provoking and inspiring arts and culture activity into access and recreation work has the potential to connect people with nature and the landscape. The Arts in the Landscape strategy, led by the National Association of AONBs, and adopted by the Cotwolds National Landscape Board in 2021 will support this work.

Lack of long-term funding from Natural England for National Trails makes long-term planning, maintenance and promotion more challenging. Ongoing partnership working with the Cotswold Way Association (CWA) and new National Trails Charity (NTUK) will be key to the long term sustainability of the Trails.

The recreational use of the National Landscape should not be allowed to adversely affect the National Landscape's special qualities. For example, measures will need to be put in place to minimise and mitigate recreational pressure arising from new developments both inside and outside the National Landscape, especially where these developments are located close to sensitive locations, such as designated nature conservation sites.

The prioritisation of 'conserving' over 'public enjoyment' is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974. This principle is embedded in the [Countryside and Rights of Way Act 2000](#), in relation to Conservation Boards.⁷⁰

Sustainable tourism

Outcome 14 – Sustainable tourism:

Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape.

Policy UE3: Sustainable tourism

- UE3.1. Tourism within the Cotswolds National Landscape (CNL) **should be** delivered and managed in a way that minimises adverse effects on and seeks to further the conservation and enhancement of the natural beauty of CNL and **should minimise** the emission of greenhouse gases.
- UE3.2. Visitors, residents, local businesses and communities should be provided with opportunities to directly contribute to conserving and enhancing the natural beauty of the Cotswolds National Landscape and improve access to the area through local individual, community and employee volunteering opportunities.
- UE3.3. The 'Caring for the Cotswolds' visitor giving scheme will raise awareness of the CNL and generate funds from visitors to directly help look after it by supporting projects which conserve habitats and species, look after heritage and landscape, improve access, and help provide education resources encouraging people to understand the landscape and nature better.
- UE3.4. Visitors should be provided with a variety of accommodation options over a range of prices. The siting and design of visitor accommodation should be compatible with conserving and enhancing the natural beauty of the CNL including its special qualities.
- UE3.5. Air travel arising from the Cotswolds as a destination should be minimised.
- UE3.6. Existing sustainable and integrated transport initiatives should be supported and new

⁷⁰ Section 87, Countryside and Rights of Way Act (2000).

initiatives developed to help facilitate the car free visitor experience.

The natural beauty of the CNL is the foundation on which the tourism industry in the Cotswolds is based. This natural beauty is an asset which needs to be managed and maintained. The tourism sector should, therefore, contribute to the conservation and enhancement of this natural beauty. New tourism products that increase the sustainable tourism offer should be encouraged. Further research and evidence are needed to better understand the impacts and patterns of tourism in the CNL to ensure it **becomes** sustainable. Updated visitor and tourism survey data would help to underpin Policies UE2 and UE3.

A recent carbon footprint assessment of the CNL⁷¹ has calculated that each year visitors are responsible for 308,806 tCO₂ whilst in the National Landscape, and 1,134,848 tCO₂ when travelling to and from it. 48% of the second figure is caused by flights. The tourism sector locally (accommodation, attractions, food and drink etc) should be moving towards becoming net zero through both how it operates within the CNL and by targeting closer audiences.

Though there is generally a significant level of appreciation for the Cotswolds landscape amongst visitors, awareness and understanding of its status as a protected landscape and the implications of this are lacking. This reduces awareness of the need for protection and enhancement of the sense of place and its distinctive features and special qualities.

Limited availability of low cost accommodation, including camping, can exclude families and those on low incomes from staying in the area, reducing the diversity of visitors. Provision of such accommodation should be compatible with the purpose of conserving and enhancing natural beauty.

The limited provision of public transport - and limited integration of this provision – restricts the scope for visitors (and residents) without a car to explore the Cotswolds resulting in a heavy reliance on car usage. Transport providers should be supported to increase and promote integrated travel initiatives in order to encourage a car-free visitor experience.

Most of the local authorities across the CNL, together with the Board, have joined together to form Cotswolds Tourism, the Destination Management Organisation (DMO) for the Cotswolds. However, further collaboration is needed to ensure the entire National Landscape is covered by a proactive and joined-up DMO which works proactively with neighbouring DMOs.

This last paragraph needs updating

⁷¹ Small World Consulting (2023). [A Green House Gas Emissions Assessment and Target Scenario for the Cotswolds National Landscape.](#)

8. Delivery and monitoring

Cotswolds National Landscape Board delivery

The Cotswolds National Landscape (CNL) Board will play an important role in delivering the vision, outcomes and policies of the Management Plan. How the CNL Board will contribute to the delivery of the Management Plan is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme. Together these show how the vision, outcomes and policies of the Management Plan are translated into measurable actions for the Board.

Stakeholder delivery

Although the CNL Board is the body responsible for preparing and publishing the Management Plan and will play an important role in its delivery, the Board doesn't actually own or directly manage any of the land in the CNL or its setting. As such, the policies of the Management Plan are also intended to guide the work of other stakeholders in helping to deliver the Management Plan's vision and outcomes.

The detail of how other stakeholders contribute to the delivery of the Management Plan is too complex to cover in this Management Plan, particularly given that the National Landscape cuts across 15 local authority areas. However, the 'Stakeholder Delivery' table in Appendix 5 outlines the key actions that the Board invites specific stakeholders to undertake in order to help deliver the Management Plan. The actions and policies listed in the table are not intended to be exhaustive.

In essence, stakeholders are asked to:

- have regard to the Management Plan, including its vision, outcomes and, perhaps most importantly, its policies;
- incorporate the Management Plan's vision, outcomes and policies into their own plans, policies, proposals, work programmes and decisions, where appropriate.

Monitoring

The National Landscape Board will monitor and evaluate its contribution to the delivery of the Management Plan through the quarterly and annual review of its work programme. The 'State of the Cotswolds Report' – together with other local and national monitoring and surveys – will contribute to the provision of evidence, which is a crucial part of managing the National Landscape.

Where practicable the Board will monitor the key actions identified in the 'Stakeholder Delivery' table in Appendix 5 and compliance with the 'duty of regard' (see Appendix 4).

The delivery of the Management Plan will be monitored through the national Protected Landscape Targets and Outcomes Framework. These targets are listed in appendix 6 where a suite of additional monitoring indicators which have been developed for each policy are also listed.

9. Appendices

Appendix 1: National Landscape (AONB) designation

The Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966 and extended in area in 1990. At 790 square miles, or 2038 square kilometres, it is the largest AONB and the third largest protected landscape in England.

Although AONB remains the legal names of the designation the Board of the Cotswolds Conservation Board decided in June 2020 to use the name National Landscape for the area designated as an AONB and the name Cotswolds National Landscape Board for the Cotswolds Conservation Board.

This plan uses the term National Landscape for the designated area and National Landscape Board for the organisation. It still refers to AONBs when referring to the use of the designation nationally or areas outside of the Cotswolds.

AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them⁷². They have the same landscape status as National Parks.

The statutory purpose of AONB designation is to conserve and enhance their natural beauty⁷³. AONBs are designated in law following a prescribed process which includes an objective appraisal of landscape quality, statutory assessments by the national conservation agencies and wide consultation with stakeholders including local landowners, residents and businesses⁷⁴.

Each AONB has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views, as outlined in Chapter 2 of the Management Plan.

AONBs exist within a legal framework which has been progressively strengthened since the first AONBs came into existence after the Second World War. The primary, or enabling, legislation for the designation of AONBs was the National Parks and Access to the Countryside Act 1949. The Countryside and Rights of Way (CRoW) Act 2000 subsumed and strengthened the AONB

provisions of the 1949 Act. It confirmed the purpose and significance of AONBs, clarified the procedure for their designation, and created a firm legislative basis for their designation, protection and management. The Act also provided for the establishment of Conservation Boards to manage AONBs – see Appendix 3.

Areas of Outstanding National Beauty are part of a family of protected areas recognised and classified by the International Union for the Conservation of Nature (IUCN) throughout the world. IUCN recognises AONBs and National Parks in England and Wales as Category V Protected Landscapes – a protected area whose special qualities are the result of the interaction between people and nature. They are managed mainly for landscape protection and recreation.

⁷² Department for Environment, Food and Rural Affairs (Defra) (2015) *Areas of Outstanding Natural Beauty: Landscape Protection and Enhancement Support Scheme (England) 2015 – 17. Application to European Commission*.

⁷³ Section 82, Countryside and Rights of Way Act 2000

⁷⁴ National Association of AONBs (2018) *AONB Management Plan Revision. Specimen text: policy and legal framework*.

Appendix 2: Natural beauty

The concept of natural beauty is one of the cornerstones of legislation to protect landscapes in the UK. It has been the basis for the designation of AONBs and National Parks since the 1949 National Parks and Access to the Countryside Act.

Natural beauty goes well beyond scenic or aesthetic value. It encompasses everything that makes an area distinctive: geology, climate, soil, plants, animals, communities, archaeology, buildings, the people who live in it, past and present, and the perceptions of those who visit it⁷⁵. It is widely accepted that natural beauty is, in part, due to human intervention, such as agriculture⁷⁶.

Natural England has developed a list of natural beauty criteria⁷⁷ to be used when assessing landscapes for designation as AONBs or National Parks, as outlined in the table below. It is Natural England's view that the practical application of the natural beauty criteria is identical for National Park and AONB designations, despite there being differences in the degree to which the criterion is clarified in the legislation⁷⁸. So, for example, the extent to which wildlife and cultural heritage are factored into natural beauty assessments by Natural England is the same for both AONBs and National Parks. It is also the Government's formal position that the natural beauty required of an AONB and a National Park are the same⁷⁹.

The list is not intended to be exhaustive and other factors may be relevant in some circumstances. Not all factors will be relevant in every case.

Table of factors related to natural beauty⁸⁰

Landscape quality

This is a measure of the physical state or condition of the landscape.

Scenic quality

The extent to which the landscape appeals to the senses (primarily, but not only, the visual senses).

Relative wildness

The degree to which relatively wild character can be perceived in the landscape makes a particular contribution to sense of place.

Relative tranquillity

The degree to which relative tranquillity can be perceived in the landscape.

⁷⁵ Countryside Agency (2001) *Areas of Outstanding Natural Beauty Management Plans*. A guide. Countryside Agency Publications. West Yorkshire

⁷⁶ Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England](#).

⁷⁷ Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England](#) (see Table 3 and Appendix 1).

⁷⁸ Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England](#).

⁷⁹ See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W).

⁸⁰ Table extracted from the Natural England guidance Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England](#).

Natural heritage features

The influence of natural heritage on the perception of the natural beauty of the area. Natural heritage includes flora, fauna, geological and physiographical features.

Cultural heritage

The influence of cultural heritage on the perception of natural beauty of the area and the degree to which associations with particular people, artists, writers or events in history contribute to such perception.

Appendix 3: Cotswold National Landscape Board

The Cotswolds Conservation Board ('the Board') was established by Parliamentary Order⁸¹ in 2004. It was renamed as the Cotswolds National Landscape Board for most purposes in June 2020 (although the legal name remains unchanged). It has two statutory purposes⁸²:

- To conserve and enhance the natural beauty of the Cotswolds National Landscape.
- To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these purposes, the Board has a duty to seek to foster the economic and social wellbeing of local communities within the National Landscape⁸³.

These purposes and duties are modelled on those of the National Park Authorities. In circumstances where the two purposes are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the National Landscape⁸⁴.

The Board consists of 37 members, of whom 15 are nominated by local authorities, eight by parish councils and 14 are appointed by government. The Board's work programme is administered by a small team of staff, supported by a network of Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the National Landscape. It is one of only two Conservation Boards in England, the other being the Chilterns Conservation Board.

The Board has a statutory responsibility, under the Countryside and Rights of Way Act (CROW) 2000, to draft and publish the Cotswolds National Landscape Management Plan and to review it at least every five years. The Board's work programme for how it will contribute to the delivery of the Management Plan is set out in the Board's separate, rolling, three-year Business Plan.

The Board has a series of functions or powers that it shares with the Local Authorities, as specified in the Board's Establishment Order.

As the only organisation with responsibilities for the Cotswolds National Landscape as a whole, the Board produces a variety of publications and guidance. This is to facilitate a consistent and coordinated approach across the whole of the National Landscape, which puts the purpose of National Landscape designation at the heart of plans, proposals, decisions and work programmes affecting the National Landscape.

Board publications that are of particular relevance to the Management Plan – and which are referred to in some of the Management Plan policies and or supporting text – are outlined below:

- **Cotswolds National Landscape – [Landscape Character Assessment \(LCA\)](#)**: The LCA provides an assessment of the character, distinctiveness and qualities of the Cotswolds National Landscape. It also identifies and describes the National Landscape's component

⁸¹ The Cotswolds Area of Outstanding Natural Beauty (Establishment of Conservation Board) Order 2004.

⁸² Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

⁸³ Section 87 of the CROW Act specifies that, '*a conservation board... shall for that purpose [i.e. fostering social and economic wellbeing] co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty*'.

⁸⁴ This prioritisation of conserving and enhancing is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974.

landscape character types (LCTs). It identifies 19 different LCTs in the Cotswolds National Landscape.

- **Cotswolds National Landscape – [Landscape Strategy and Guidelines](#)**: The Landscape Strategy and Guidelines provides an overview of the forces for change that are influencing the landscape of the Cotswolds National Landscape and outlines a series of landscape and land management strategies to help guide change in a positive and sustainable way. It is intended to help developers, local planning authorities, land managers and other decision makers to make informed decisions about the suitability of proposed development – or other changes – within each of the LCTs.
- **[Cotswolds Nature Recovery Plan](#)**. The Nature Recovery Plan represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change. It sets priorities and targets for nature recovery and describes the measures that can achieve it.
- **[Position Statements](#)**: The Board issues a number of Position Statements, which ‘amplify’ specific policies in, or add new policies to, the Management Plan. They contain further background information and recommended good practice. They are reviewed and updated on a regular basis.
- **[Cotswolds National Landscape Local Distinctiveness and Landscape Change](#)**⁸⁵⁸⁴: This document aims to assist a wide range of stakeholders to broaden their understanding of what makes the Cotswolds National Landscape special and different from other parts of the country.
- **The Cotswolds National Landscape [Climate Change Strategy](#)** (adopted by the National Landscape Board in February 2022). This summarises our current understanding of the climate change impacts on the Cotswolds and what stakeholders can do to both adapt to and mitigate these impacts.

⁸⁵ Conservation Board (2003) *Cotswolds Area of Outstanding Natural Beauty – Local Distinctiveness and Landscape Change*. Produced by Latham Architects for the Cotswolds AONB Partnership.

Appendix 4: The “seek to further” duty.

Section 245 of the Levelling Up and Regeneration Act 2023⁸⁶ places a duty on relevant authorities⁸⁷ to seek to further the statutory purposes of protected landscapes⁸⁸ (the ‘seek to further’ duty). With regards to national landscapes, this requirement has been incorporated into Section 85 of the Countryside and Rights of Way (CROW) Act, which now states:

- *In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England, a relevant authority other than a devolved Welsh authority must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.*⁸⁹

This replaces the previous version of Section 85 of the CROW Act, which required relevant authorities to have regard to the statutory purpose of national landscapes.

Section 245 was inserted into the Levelling Up and Regeneration Bill by the House of Lords as it made its way through Parliament. The Government’s Explanatory Notes on the Lords Amendments to the Bill for this Act provide that (emphasis added):

- *The clause strengthens the duty on certain public authorities when carrying out functions in relation to these landscapes to seek to further the statutory purposes and confers a power to make provision as to how they should do this.*⁹⁰

The ‘seek to further’ duty is, therefore, clearly intended to impose new and more onerous requirements with respect to the statutory purposes than existed before.⁹¹

In this regard, the Government’s press release, when the Levelling Up and Regeneration Bill became law in October 2023, stated that (emphasis added):

- *The Act will enhance our national network of beautiful, nature-rich protected landscapes that can be enjoyed right across the country.*⁹²

The ‘seek to further’ duty is, therefore, clearly intended to ensure that the natural beauty of protected landscapes (including national landscapes) will be enhanced as a result of relevant authorities exercising or performing their functions.

The LURA confers powers on the Secretary of State to make provisions for how a relevant authority is to comply with the ‘seek to further’ duty, including what the authority may, must or must not do to comply with the duty. It is also anticipated that the Government will provide guidance on how the duty should be applied in due course. However, the duty is not dependent

⁸⁶ Section 245 of the Levelling Up and Regeneration Act 2023 ([link](#)).

⁸⁷ ‘Relevant authority’, in this context, includes any Minister of the Crown, public body, statutory undertaker or person holding public office.

⁸⁸ ‘Protected landscapes’ means national parks, the Broads and national landscapes.

⁸⁹ Section 85 of the Countryside and Rights of Way Act 2000 ([link](#)).

⁹⁰ UK Parliament (2023) *Levelling Up and Regeneration Bill – Explanatory Notes on Lords Amendments*. Updated version, 12 October 2023. ([Link](#)). Page 35.

⁹¹ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 6.

⁹² <https://www.gov.uk/government/news/new-laws-to-speed-up-planning-build-homes-and-level-up>

on these provisions or on this guidance – it is in force now, and must be complied with as part of any decision or course of action that has implications for these protected areas.⁹³

At the present time, the two most useful reference points relating to the ‘seek to further’ duty are the advice produced by Natural England⁹⁴ and the legal opinion obtained by Campaign for National Parks (CNP)⁹⁵.

The Natural England advice states that:

- *The duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the protected landscape (A National Park, the Broads, or an AONB) can be furthered.*
- *The new duty underlines the importance of avoiding harm to the statutory purposes of protected landscapes but also to seek to further the conservation and enhancement of a protected landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with reasoned evidence what measures can be taken to further the statutory purpose. If it is not practicable or feasible to take those measures the relevant authority should provide evidence to show why it is not practicable or feasible.*
- *The proposed measures to further the statutory purposes of a protected landscape, should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England’s view is that the proposed measures should align with and help to deliver the aims and objectives of the designated landscape’s statutory management plan. The relevant protected landscape team/body should be consulted.*

The CNP’s legal opinion sets out a number of principles to help ensure compliance with the ‘seek to further’ duty:⁹⁶

- (a) *The new duties are very broad in scope, applying to “any functions” in relation to, or so as to affect, land in the protected areas. Relevant authorities would do well to assume that if their decision touches in any way upon an AONB, National Park or the Broads, the relevant duty is engaged.*
- (b) *The duties are pro-active, and not merely an afterthought: the authority must “seek to further” the stated purposes in the exercise of their functions. That means that the duties should be pro-actively considered as part of any decision to which the duty applies. A failure to consider those duties, or a failure to understand their pro-active and mandatory nature, would be an error of law.*
- (c) *An authority must factor in the relevant duty before the adoption of a proposed policy and not merely as a “rearguard action”, following a concluded decision.*

⁹³ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 2a.

⁹⁴ This advice ([link](#) – Annex 2) was submitted, in December 2023, by Natural England, as a statutory consultee, to the Examining Authority for the examination of the Lower Thames Crossing, which is a Nationally Significant Infrastructure Project (NSIP).

⁹⁵ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)).

⁹⁶ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 17.

- (d) It will be important for relevant authorities to record the steps taken by the decision maker in seeking to meet the statutory requirements and demonstrate how the decision complies with the duty.
- (e) While there is no obvious requirement to expressly reference the new duties in every decision, they are not merely a box-ticking exercise, and they must be rigorously applied as part of any relevant decision.
- (f) General regard to the benefit of protecting these landscapes is not the same as having specific regard to the statutory purposes, by way of conscious approach to the statutory criteria.
- (g) These duties are outcome-based: they do not simply require “due regard” to be had to them. If, having considered the implications of a decision, an authority reaches the view that the decision does not “seek to further” the applicable legislative purpose, it would be hard to argue that the decision would in fact be open to the relevant authority: because it would appear to be in breach of the applicable duty. In those circumstances, the decision would need to either be withdrawn or modified such that the relevant authority could confidently say that it did seek to further the relevant purpose.
- (h) To be clear, however, this does not mean that the duty precludes decisions that are “net harmful” to an AONB, National Park or the Broads: if that were so, the duty would be to “further the purpose” rather than to “seek to further the purpose.” But what is required is positive evidence that the relevant authority has, in all the circumstances, sought to further the purpose: not merely through mitigation of harm but by taking all reasonable steps to further the purpose.
- (i) As to whether a decision or course of action in fact seeks to further the relevant purpose ... this is a question for the relevant authority in the first instance, subject to challenge on *Wednesbury* principles. But a positive conclusion that the decision or course of action does seek to further that purpose is clearly required.

The legal opinion goes on to pose a number of questions that a relevant authority should ask itself when considering whether it has complied with the duty:⁹⁷

- i. What are the required statutory purposes my decision must seek to further?
- ii. Does my decision in fact pro-actively seek to further those purposes? If so, how does it do so? If not, how can my decision be modified so that I can confidently conclude that it does seek to further the relevant purposes?
- iii. As a matter of best practice, have I recorded how I have concluded that my decision seeks to further the required purposes, which I can produce in the event of a subsequent legal challenge?

The legal opinion makes the following additional points:⁹⁸

- [Relevant authorities] would be well-advised not to treat the new duties as “business as usual” and to consider the pro-active duties now placed on them to seek to further the purposes of AONBs, National Parks and the Broads. I agree with Natural England that this means that relevant authorities should ensure, with evidence, that their decisions do all they reasonably can to further the statutory purposes, including going beyond merely mitigating harm. This could include, for example, delivering enhancements to the natural

⁹⁷ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 19.

⁹⁸ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 21.

beauty of the area, or creating new opportunities for the understanding and enjoyment of the special qualities of national parks by the public (rather than merely maintaining or supporting existing opportunities). Moreover, if there is an obvious alternative approach that better furthers the statutory purposes and the relevant authority cannot evidence (1) why it cannot reasonably adopt that approach or (2) that its chosen approach also seeks to further the statutory purposes, the decision will be open to legal challenge.

Appendix 5: Stakeholder delivery – priority actions

National Landscape Board Delivery How the National Landscape Board will contribute to the delivery of the Management Plan is set out in a three yearly Business Plan Framework which in turn is delivered through an annual work programme.

Recommended Stakeholder Actions Every individual and organisation with an interest in the National Landscape can help make this plan’s vision and outcomes a reality by contributing its delivery. Many of these stakeholders already make a significant contribution to delivery. This ‘Stakeholder Delivery’ table provides an indication of the key measures that the Board invites specific stakeholders to undertake in order to help deliver this plan.

Stakeholder	Key measure (i.e. ‘if you do nothing else to support the implementation of the Management Plan, please do this’)	Most relevant policies (update)
All ‘relevant authorities’ ⁹⁹	Have regard to (does this need to change to seek to further?) the Cotswolds National Landscape Management Plan and other National Landscape guidance. This should include helping to deliver the vision, outcomes and policies of the National Landscape Management Plan by: (i) addressing them – and, where appropriate, adopting them – in relevant plans, policies, proposals, work programmes, decisions and actions; and (ii) recognising them as priorities for investment. Comply with Section 85 of the Countryside and Rights of Way Act (the ‘duty of regard’) and have regard to the supporting guidance published by Defra and Natural England.	CC3, CE1, CE3, CE8, CE10 CC7
Department for the Environment, Food and Rural Affairs (Defra)	Ensure that the Government’s response to the Landscapes Review published in 2019, enhances the level of protection afforded to AONBs and champions their value to the nation.	CC6, CE10
	Following the Government’s review of protected landscapes, publish new guidance on protected landscapes ¹⁰⁰ , reinforcing the role and purpose of our protected landscape family.	CC6, CE1, CE8, CE10
	Review the Government’s guidance on ‘the duty of regard’ to make the duty more robust.	CC7
	Ensure that Environmental Land Management and rural development support mechanisms contain measures appropriate for the Cotswolds National Landscape and are targeted towards the delivery of Local Nature Recovery Strategies.	CE8
Department of Levelling Up, Housing and Communities	Publish new guidance, to accompany the National Planning Policy Framework, which clarifies and explains: <ul style="list-style-type: none"> the meaning of ‘highest status of protection’; that development in AONBs should be limited; what the development priorities should be for AONBs (i.e. affordable housing and improvement of services); what constitutes ‘exceptional circumstances’ and ‘in the public interest’, in the context of major development. 	CC6, CE10, CE11, CE12

⁹⁹ As defined in Section 85 of the Countryside and Rights of Way Act 2000, which is explained in Appendix 4. Includes all public bodies and statutory undertakers.

¹⁰⁰ For example, an updated version of ‘English National Parks and the Broads. UK Government Vision and Circular 2010’ (Defra, 2010), but which would also address National Landscapes.

Natural England	Support the establishment and delivery of Environmental Land Management and rural development support mechanisms	CE8
	specifically for the Cotswolds National Landscape.	UE2
	Provide funding for National Trails through three-year rolling funding streams, and provide cohesive national co-ordination	CE7
Forestry Commission	Develop and support land management and rural development support mechanisms appropriate for the Cotswolds National Landscape.	CE8, CE7
	Ensure that publicly funded woodland creation schemes reflect Cotswolds National Landscape Board guidance including the Landscape Strategy and Guidelines and the Nature Recovery Plan.	CE1, CE7
Environment Agency	Support the delivery of the Cotswold Nature Recovery Plan and the River Valleys Nature Improvement Area, for example, through appropriate policies and actions in River Basin and Catchment Management Plans.	CE7
	Lead on the delivery of actions to implement the Water Framework Directive.	CC5
Historic England	Facilitate greater access to the Cotswolds National Landscape Historic Landscape Character Assessment and Historic Environment Records.	CE6
	Work with other stakeholders to enhance the interpretation of core properties and scheduled ancient monuments.	CE6
	Support measures to ensure that scheduled ancient monuments are brought into good condition.	CE6
Health and Wellbeing Boards	Commission health walks and conservation activity as an adjunct or alternative to normal prescription treatment.	UE1
	Invest in programmes to help deprived communities, within the Cotswolds National Landscape and surrounding areas, overcome barriers preventing them from realising the mental and physical health benefits of enjoying the National Landscape.	UE2
Local Enterprise Partnerships	Support the development of funding mechanisms that leverage private finance to provide for payments for ecosystem services.	CE8, CE10, CE1, UE3
Local Authorities	Endorse the Cotswolds National Landscape Management Plan.	
	Recognise the Cotswolds National Landscape Management Plan as a material consideration in Local Plans and in planning decisions.	CE10
	Include a policy specifically about the Cotswolds National Landscape in Local Plans, which specifies how the purpose of National Landscape designation will be achieved in the Local Plan area.	CE10
	Ensure that Local Nature Recovery Strategies take account of the outcomes, priorities and measures of the Cotswolds Nature Recovery Plan.	CE7
	Prioritise the provision of affordable housing to meet identified local needs arising from within the National Landscape.	CE12
	Maintain and enhance public access, roads, public transport and countryside management, in line with the policies of the Cotswolds National Landscape Management Plan.	UE2, CE10, UE3, CE1, CE6,

		CE7, CE8
Town and Parish Councils and Parish Meetings	Use the Cotswolds National Landscape Management Plan and Landscape Strategy and Guidelines to inform Neighbourhood Plans, Parish Plans and Village Design Statements and when considering planning applications.	CC6, CC7, CE10, CE12
Town and Parish Councils and Parish Meetings	Celebrate and promote the fact that the town or parish lies within the Cotswolds National Landscape by: <ul style="list-style-type: none"> • utilising National Landscape boundary markers; • incorporating 'within the Cotswolds National Landscape' text in village or town entry signs; • providing information about the Cotswolds National Landscape on information panels and displays in the town or parish. 	UE2
Conservation organisations	Help to halt and reverse declines in priority habitats and species.	CE7
	Help to establish and manage coherent and resilient nature recovery networks that join up across the National Landscape as outlined in the Cotswolds Nature Recovery Plan.	CE7
Historic environment and cultural heritage organisations	Support the conservation, enhancement, promotion and monitoring of the historical environment and cultural heritage of the Cotswolds National Landscape.	CE6
Farmers, landowners, land managers and related organisations	Use the Cotswolds National Landscape Management Plan and guidance published by the Cotswolds Conservation Board, including the Landscape Strategy and Guidelines and Cotswolds Nature Recovery Plan, to inform investment, development, and land management decisions and actions.	All
	Ensure that environmental land management and rural development support mechanisms support the Cotswolds National Landscape's policies and guidance and deliver Local Nature recovery Strategies.	CE8
Tourism organisations and tourism providers	Support the development of and contribute to the Caring for the Cotswolds visitor giving scheme.	UE3
	Support a coordinated approach to tourism across the whole of the Cotswolds, including the implementation of the Cotswolds Destination Management Plan (published in 2014).	CC6, UE2, UE3
Geology Trusts	Support the conservation and enhancement of geological and geomorphological features in the Cotswolds National Landscape.	CE2
	Support the increased understanding and awareness of geological and geomorphological features in the Cotswolds National Landscape.	CE2
Developers and infrastructure providers (including utilities, rail and highways)	Avoid adverse impacts on the Cotswolds National Landscape resulting from development and infrastructure provision. Mitigate unavoidable impacts and, as a last resort, compensate for impacts that cannot be mitigated on site, for example, by enhancing visual amenity.	CE1, CE10
	Ensure that any major infrastructure projects that are permitted in the Cotswolds National Landscape are 'landscape-led' ¹⁰¹ .	CE11

¹⁰¹ See Policy CE10.6, paragraph 2, for more details on what 'landscape-led' means in this context.

Appendix 6: Monitoring indicators

Assessing progress towards the targets in the Defra [Protected Landscapes Targets and Outcomes Framework](#).

Defra will use the following indicators to measure progress towards the targets and outcomes set out in the framework.

Thriving plants and wildlife indicators

The following indicators will measure progress on the 'thriving plants and wildlife' targets:

- extent of wildlife rich habitat created or restored within Protected Landscapes, outside of protected sites
- percentage of SSSIs within Protected Landscapes in favourable condition
- percentage of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition
- extent of priority habitat within Protected Landscapes, outside of protected sites, in favourable management through agri-environment schemes
- percentage of land managers adopting nature-friendly farming on a percentage of their land

Mitigating and adapting to climate change indicators

The following indicators will measure progress on the 'mitigating and adapting to climate change' targets:

- the level of greenhouse gas emissions within Protected Landscapes
- extent of peat under restoration in Protected Landscapes
- extent of tree canopy and woodland cover in Protected Landscapes

Enhancing beauty, heritage and engagement with the natural environment

In future we intend to focus our access metrics on our EIP commitments that everyone should live within 15 minutes' walk of a green or blue space and we will work to remove barriers to access.

The following indicators will measure progress on the 'enhancing beauty, heritage and engagement' targets:

- improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme:
 - metres of accessible path as a percentage of total path
 - number of accessible toilets and rest stops
 - number of disability accessible parking spaces
 - number of accessible gates and gaps
 - number of visits and volunteer days facilitated by new equipment
 - number of schools engaged (primary and secondary) both inside and outside the Protected Landscape boundary
 - number of volunteer days
 - number of accessible or easy access routes for which wayfinding has been created or improved
 - policies in place to ensure Protected Landscapes are taking positive action to widen the diversity of their staff, boards and volunteers
- number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk. To separately cover the categories of:
 - scheduled monuments
 - registered parks and gardens
 - registered battlefields

- listed buildings (grade I or II*)
- protected wreck sites

Additional monitoring indicators under management plan outcomes and policies (will be reviewed against the new national outcomes framework)

Cross cutting

Climate action (Outcome 1)

Policy CC1 – Climate change mitigation

- Indicator 1: Total output from new renewable energy schemes permitted in the Cotswolds National Landscape.
- Indicator 2: Endorsement by the National Landscape Board and adoption by partners of a path to net zero emissions for the National Landscape (or better) by 2050 (or sooner), including clear, measurable targets.
- Indicator 3: Extent of tree canopy and woodland cover (Ha).

Policy CC2 – Climate change adaptation

- Indicator 4: Research into the predicted impacts of climate change on the Cotswolds National Landscape.

Natural and cultural capital (Outcome 2)

Policy CC3 – Natural and cultural capital principles

- Indicator 5: Extent to which the natural and cultural capital of the Cotswolds National Landscape has been assessed and evaluated.

Policy CC4 – Soils

- Indicator 6: Area of land under agri- environment/Environmental Land Management schemes for soil management.

Policy CC5 – Water

- Indicator 7: % of water bodies achieving 'good' ecological status.

Working together (Outcome 3)

Policy CC6 – Developing a consistent coordinated and landscape-led approach

- Indicator 8: % of respondents 'highly valuing' the Cotswold National Landscape in residents & visitor surveys.

Policy CC7 – Compliance with section 85 of the CRoW Act

- Indicator 9: % of planning decisions that demonstrably have regard to the purpose of National Landscape designation.
- Indicator 10: % of planning decisions that are made in line with CNL Board recommendations.

Policy CC8 – Working together (see Indicator 8)

Conserving and enhancing

Landscape (Outcome 4)

Policy CE1 – Landscape

- Indicator 11: Changes to landscape character identified through fixed-point photography.

Policy CE2 – Geology

- Indicator 12: Condition of designated geological sites.

Local distinctiveness (Outcome 5)

Policy CE3 – Local distinctiveness

- Indicator 13: Publication of development design guidance.

Tranquillity (Outcome 6)

Policy CE4 – Tranquillity

- Indicator 14: % of National Landscape recorded as 'most tranquil'.

Dark skies (Outcome 7)

Policy CE5 – Dark skies

- Indicator 15: % of National Landscape affected by light pollution.

Historic environment and cultural heritage (Outcome 8)

Policy CE6 – Historic environment and cultural Heritage

- Indicator 16: Area of land under agri- environment/Environmental Land Management schemes for the management and protection of archaeological features.
- Indicator 17: Number of sites identified as Heritage at Risk.

Biodiversity and nature recovery (Outcome 9)

Policy CE7 – Biodiversity and nature recovery

- Indicator 18: SSSI condition.
- Indicator 19: % of area of priority habitats managed under agri-environment/ Environmental Land Management schemes.
- Indicator 20: Extent of wildlife rich habitat (Ha) created or restored outside of protected sites.
- Indicator 20: Extent of habitats (Ha) within a nature recovery network.

Rural land management (Outcome 10)

Policy CE8 – Rural land management

- Indicator 21: % of land (including woodland) managed under agri-environment/ Environmental Land Management schemes.
- Indicator 22: Establishment of a Cotswolds- specific package of Environmental Land Management and rural support payments.

Policy CE9 – Problem species, pests and diseases

- Indicator 23: Extent of tree pests and diseases.

Development and transport (Outcome 11)

Policy CE10 – Development and transport principles

- Indicator 24: Number of adopted Local Plans with policy-level reference to the Cotswolds National Landscape Management Plan.

Policy CE11 – Major development

- Indicator 25: Number of major developments permitted by local planning authorities.

Policy CE12 – Development priorities and evidence of need

- Indicator 26: Number of new housing units permitted.

Policy CE13 – Waste management and the circular economy

- Indicator 27: Number of landfill and strategic waste management sites permitted.

Understanding and enjoyment

Health and wellbeing (Outcome 12)

Policy UE1 – Health and wellbeing

- Indicator 28: Number of educational projects run by the Cotswold Voluntary Wardens.

Access and recreation (Outcome 13)

Policy UE2 – Access and recreation (see also Indicator 8):

- Indicator 29: Number of improvements made to the Public Rights of Way network by the Cotswold Voluntary Wardens.
- Indicator 30: Downloads of walking and exploring resources from the Cotswolds National Landscape Board website.

Sustainable tourism (Outcome 14)

Policy UE3 – Sustainable tourism

- Indicator 31: Number of businesses that are signed up to the Caring for the Cotswolds visitor giving scheme.
- Indicator 32: Income generated through the Caring for the Cotswolds visitor giving scheme.

Appendix 7: Priority habits and species

This list of priority habitats and species for the Cotswolds National Landscape is adapted from Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which lists the habitats and species that are of principal importance for the conservation of biodiversity in England. The habitats and species listed below are considered to be: (i) characteristic of the Cotswolds; and/or (ii) those for which the Cotswolds National Landscape is considered to be a stronghold of those particular habitats or species. There are other priority habitats and species within the National Landscape, which merit an appropriate level of protection, but which do not meet the two criteria outlined above. Habitats and species with an asterisk (*) are not on the NERC Act list but have been identified, by the National Landscape Board and relevant stakeholders, as priorities for the Cotswolds National Landscape.

Habitats

- Lowland mixed deciduous woodland
- Lowland beech and yew woodland
- Wood pasture, parkland, veteran trees and large areas of tree, scrub and grassland mosaic
- Lowland wildflower rich calcareous and neutral grasslands
- Flushes, streams and rivers
- Arable field margins important for birds and plant species
- Hedgerows
- Common box woodland
- Areas important for bats ('batscapes') *
- H7720 petrifying springs with tufa formation (Crataneurion)*

Species

- Farmland birds, such as skylark, lapwing and corn bunting
- Pasqueflower
- Pearl-bordered fritillary
- Arable plants
- Juniper
- Cotswold pennycress
- Bats
- Dormouse
- Water vole
- Brown hare
- Limestone grassland butterflies
- Marsh fritillary
- Violet click beetle
- White clawed crayfish
- Native brown trout
- Bath asparagus*
- Common box*
- Rockrose pot beetle
- Rugged oil beetle
- Ancient woodland ground flora, such as helleborines and angular Solomon seal.
- Ancient grassland flora such as musk and fly orchid

Appendix 8: Why biodiversity is an important consideration in the Cotswolds National Landscape

Introduction

This appendix sets out why biodiversity is an important consideration in the Cotswolds National Landscape (including why a higher biodiversity net gain requirement would be appropriate in the Cotswolds National Landscape, compared to neighbouring, non-designated areas).

Statutory purposes, duties and powers The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB). The statutory purpose of AONB designation is to conserve and enhance the natural beauty of these areas.¹⁰² Local authorities and other 'relevant authorities' have a statutory duty to **seek to further the purpose of** conserving and enhancing the natural beauty of AONBs.¹⁰³ Local authorities also have the statutory power to take action to accomplish this purpose.¹⁰⁴

Public authorities also have a statutory biodiversity duty¹⁰⁵ that the Environment Act 2021 introduced. Under this duty they "*must consider what they can do to conserve and enhance biodiversity in England.*"

Link between natural beauty and biodiversity

Natural heritage (including biodiversity) is one of the factors that contributes to the natural beauty of AONBs.¹⁰⁶ As such, the conservation and enhancement of biodiversity is an important consideration when **seeking to further** the purpose of AONB designation.

Paragraph 176 of the National Planning Policy Framework (NPPF) states that '*the conservation and enhancement of wildlife and cultural heritage are also important considerations in [AONBs]*'.¹⁰⁷

Biodiversity Net Gain and the Seek to Further Duty

Research by the Kent Nature Partnership (KNP) has identified that increasing biodiversity net gain (BNG) delivery from 10% to 20% doesn't significantly affect viability.¹⁰⁸ A recent Wildlife and Countryside Link report on BNG refers to that KNP research.¹⁰⁹ It also states that Defra's own research¹¹⁰ has shown that 10% BNG is the minimum that is required to ensure no net loss. So, it could be argued that in order to actually deliver a genuine gain in biodiversity, you need to have a BNG figure higher than 10%.

¹⁰² Section 82 of the [Countryside and Rights of Way \(CROW\) Act 2000](#).

¹⁰³ Section 85 of the [CROW ACT 2000](#). Further information on the 'duty of regard' is provided in Appendix 4 of the Cotswolds AONB Management Plan [2025-2030](#).

¹⁰⁴ Section 84 of the [CROW Act 2000](#).

¹⁰⁵ <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty>

¹⁰⁶ Natural England (2011) [Guidance for assessing landscapes for designations as National Park or AONB in England](#). Table 3, page 13, and Appendix 1, page 25.

¹⁰⁷ Ministry of Housing, Communities and Local Government (2021) [National Planning Policy Framework](#). Paragraph 176, page 50.

¹⁰⁸ <https://cieem.net/kent-assesses-20-biodiversity-net-gain-requirement/>

¹⁰⁹ Wildlife and Countryside Link (2024) *Biodiversity Net Gain: more than a fancy offset?* ([link](#)).

¹¹⁰ https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/181121%20%20Biodiversity%20Net%20Gain%20Consultation%20IA%20FINAL%20for%20publication.pdf. The relevant section is 5.1.1, page 18.

The University of Kent's research into BNG outcomes for early adopter councils shows that certain loss of biodiversity is being traded for the promise of unverifiable gains at some point in the future.¹¹¹

This is relevant to the new statutory duty to seek to further the purpose of protected landscapes designation (i.e. for national landscapes, to further the purpose of conserving and enhancing the natural beauty of the protected landscape). As outlined above, natural heritage / biodiversity is one of the factors that contributes to the natural beauty of a national landscape. If 10% BNG is the minimum that is required to ensure no net loss, then 10% BNG isn't necessarily enhancing the natural beauty of the area, in this regard, it is just ensuring no net loss. For actual enhancement of natural beauty (in relation to biodiversity), it could be argued that a BNG figure of more than 10% is necessary.

Landscapes Review, Government response and '30 by 30'

The Government-commissioned Landscapes Review Final Report¹¹² proposes that:

- national landscapes¹¹³ should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries;¹¹⁴
- national landscapes should have a renewed mission to recover and enhance nature;¹¹⁵
- there should be stronger purposes in law for our national landscapes, including 'recover, conserve and enhance... biodiversity';
- strengthened [AONB] Management Plans should set clear priorities and actions for nature recovery.¹¹⁶

The [Government's response to the Landscapes Review](#) Final Report states that:

- Working with... AONBs in the coming years, we will ensure our protected landscapes boost biodiversity.¹¹⁷
- Our vision for protected landscapes is a coherent national network of... nature-rich spaces... Protected landscapes will drive forward nature recovery.¹¹⁸
 - The Prime Minister has committed to protect 30% of UK land for nature by 2030 (30 by 30)¹¹⁹ ...Achieving 30 by 30 will rely on improvements in how these areas are protected and managed for nature recovery.¹²⁰
 - We will put our protected landscapes at the heart of delivering our nature recovery... policies.¹²¹

¹¹¹ zu Ermgassen, S.O.S.E., Marsh, S., Ryland, K., Church, E., Marsh, R., Bull, J. W. (2021). *Exploring the ecological outcomes of mandatory biodiversity net gain using evidence from early-adopter jurisdictions in England*. Conservation Letters. 14: e12820. <https://doi.org/10.1111/conl.12820>

¹¹² Defra (2019) [Landscapes Review Final Report](#).

¹¹³ The phrase 'national landscapes' relates to AONBs and national parks.

¹¹⁴ Proposal 4, page 52.

¹¹⁵ Proposal 1, page 36.

¹¹⁶ Proposal 3, page 43.

¹¹⁷ [Landscapes review: government response](#). Foreword.

¹¹⁸ Landscapes review: government response. Introduction.

¹¹⁹ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>. This press release implies that the 30% figure includes the entirety of AONBs: 'Existing National Parks, Areas of Outstanding Natural Beauty and other protected areas already comprise approximately 26% of land in England. An additional 4%... will be protected to support the recovery of nature'. However, the Government's response to the Landscapes Review states that 'at present, under their current statutory purposes, level of protection and management, protected landscapes cannot be said to contribute towards 30 by 30 in their entirety'.

¹²⁰ [Landscapes review: government response](#). Since the publication of the review - nature and climate.

¹²¹ [Landscapes review: government response](#). Chapter 2: Nature and climate.

- Given their spatial scale, and track records in planning and delivering landscape-scale restoration projects, protected landscapes could play a particularly important role in the delivery of the Nature Recovery Network.¹²²
- We will explore ways for protected landscapes to support responsible authorities in preparing [Local Nature Recovery Strategies].¹²³
- By strengthening the first purpose [of protected landscape designation] for nature... we will ensure these areas can contribute to this ambitious commitment for biodiversity and our wider nature recovery ambitions.¹²⁴
- We will strengthen this purpose [to 'conserve and enhance'], making it clear that we need to actively recover nature in these areas, rather than simply conserve what remains.¹²⁵
- A core function of protected landscapes should be to drive nature recovery.¹²⁶

The Government report 'Delivering 30by30 on land in England'¹²⁷ states that '30by30' will be delivered across three themes:

1. Strengthening.
2. Extending and creating.
3. Investing.

Measures identified under the 'strengthening' theme that relate specifically to protected landscapes include:

- Action through the Levelling Up and Regeneration Act to enhance Protected Landscape management plans and place a stronger requirement on partners such as local authorities and public bodies to contribute to their delivery.
- The creation of a new partnership between the National Landscapes Association (formerly the National Association for Areas of Outstanding Natural Beauty), National Parks England, National Trails UK and Natural England to deliver a range of exciting projects and programmes on nature recovery and widening access to nature. The partnership will also boost opportunities for private sector investment in our Protected Landscapes.
- A new outcomes framework for Protected Landscapes, which will set targets for their contributions to national environment and climate commitments, to be embedded in their management plans. We are also updating Protected Landscape management plan guidance to ensure consistency.
- Our response to the consultation on implementing the Landscapes Review, which sets out our action plan for Protected Landscapes.

Measures identified under the 'investing' theme that relate specifically to protected landscapes include:

- Committing to invest £100 million in thriving farming businesses through our successful Farming in Protected Landscapes (FiPL) programme. More than 5,000 farmers and land 8 of 15 managers have engaged with the programme, delivering projects that achieve outcomes for climate, nature, people and place.
- Investing in National Parks Partnerships and the National Landscapes Association to build the capacity to create a pipeline of projects to generate more private finance in Protected Landscapes.
- Pledging a further £15 million to support our existing National Parks and National Landscapes, helping to support our most iconic landscapes.

The report also states that protected landscapes will be at the heart of 30by30.

¹²² [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²³ [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²⁴ [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²⁵ [Landscapes review: government response](#). A stronger mission for nature recovery.

¹²⁶ [Landscapes review: government response](#). A stronger mission for nature recovery.

¹²⁷ Department of Farming, Food & Rural Affairs (Defra) (2024) *Delivering 30by30 on land in England* ([link](#)).

As such, protected landscapes (including national landscapes) are clearly a vital component of delivering the 30by30 commitment (i.e., ensuring that 30% of land in England is managed for nature).

Protected Landscapes Targets and Outcomes Framework

The Government's Protected Landscapes Targets and Outcomes Framework identifies several biodiversity-related targets, specifically for protected landscapes, that are relevant to the Cotswolds National Landscape:¹²⁸

- **Target 1:** Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites, by 2042 (from a 2022 baseline).¹²⁹
- **Target 2:** Bring 80% of Sites of Special Scientific Interest (SSSIs) within Protected Landscapes into favourable condition by 2042.
- **Target 3:** For 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
- **Target 4:** Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.
- **Target 5:** Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% of their land by 2030.
- **Target 8:** Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

Colchester Declaration

The 'Colchester Declaration', launched in 2019, is a formal commitment by the family of AONBs, under the umbrella of the National Association of AONBs (NAAONB), to redress declines in species and habitats within the context of a wider response to climate change.

The commitments include that, by 2030:

- At least 200,000ha of Sites of Special Scientific Interest (SSSIs) in AONBs will be in favourable condition.
- At least 100,000ha of wildlife-rich habitat outside of protected sites will have been created/restored in AONBs.
- At least 36,000ha of new woodland will have been planted or allowed to regenerate in AONBs following the principle of the right tree in the right place.

Considerations specific to the Cotswolds National Landscape

Two of the 'special qualities' of the Cotswolds National Landscape (CNL)¹³⁰ are the:

- Flower-rich grasslands particularly limestone grasslands;
- Ancient broadleaved woodland particularly along the crest of the escarpment.

The special qualities of the CNL are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national scale. They are the key attributes on which the priorities for the area's conservation, enhancement and management should be based.

¹²⁸ <https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework>

¹²⁹ This is half of the national target (including areas outside protected landscapes) of restoring or creating 500,000 hectares of wildlife-rich habitat, outside protected sites, by 2042 ([link](#)), even though protected landscapes only cover 25% of England.

¹³⁰ Chapter 4 provides a full list of the National Landscape's special qualities.

In the 1930s, 40% of the CNL was covered in wildflower-rich grasslands. Sadly, agricultural intensification and changing land management practices have led to the loss of almost all of this wildflower grassland... less than 1.5% remains.¹³¹

In 2019, the CNL Board published the Cotswolds Nature Recovery Plan (CNRP)¹³² which identifies that in order to form a robust nature recovery network, the extent of wildlife rich habitats within the CNL needs to expand from 48,000ha (23% of the CNL area) to 82,000ha¹³³ (40% of the CNL area), with the target being to achieve this by 2050. This is consistent with the current scientific evidence¹³⁴.

The highest priority habitats in the CNRP are:

- veteran trees;
- ancient woodland;
- ancient, unimproved, limestone grassland.

The CNRP states that achieving this target will require a farmer and land manager led approach to nature recovery, for example, through Environmental Land Management Schemes and Payment for Ecosystems. Biodiversity Net Gain mechanisms will also play an important role. It is also intended that the CNRP will feed into the forthcoming Local Nature Recovery Strategies.

¹³¹ Cotswolds National Landscape. [Glorious Cotswold Grasslands](#).

¹³² Cotswolds Conservation Board (2021). [Cotswolds Nature Recovery Plan](#).

¹³³ The figure rises to over 190,000ha if arable fields containing environmental measures are included.

¹³⁴ Defining and delivering resilient ecological networks: Nature Conservation in England. Isaac. N.J. et al 2017. Journal of Applied Ecology

Appendix 9: Major development

Footnote 64 of the National Planning Policy Framework (NPPF) clarifies that:

- *'For the purposes of paragraphs 182 and 183 [relating to protected landscapes, including national landscapes], whether a development is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.*

As such, it is not possible or appropriate to apply a blanket definition for what should be treated as major development in the Cotswolds National Landscape (CNL). Nevertheless, there are some key factors that help to define if a development is major, as outlined below.

The purpose for which the CNL has been designated is to conserve and enhance its natural beauty. Therefore, the judgement as to whether or not a development is major development depends, to a large degree, on whether or not the development could have a significant adverse impact on the natural beauty of the CNL. As outlined in Appendix 2, natural beauty incorporates a number of criteria, including landscape quality, scenic quality, tranquillity, natural heritage and cultural heritage. Within the context of the CNL, those aspects of the CNL's natural beauty which make the area distinctive and which are particularly valuable – the CNL's 'special qualities' – are listed in Chapter 2.

On this basis, a development should be considered 'major' if, by reason of its nature, scale and/or setting, it could have a significant adverse impact on any of the above criteria, including the CNL's 'special qualities'. As well as potential impacts within the CNL, consideration should also be given to impacts on these criteria within the setting of the CNL, particularly in the context of visual impact (i.e. views into and out of the CNL) and impacts on tranquillity.

As outlined in paragraph 183 of the NPPF, applications for such development should include an assessment of:

- a. *'the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy';*

The Board would expect any such development proposal be accompanied by a statement of need in the context of national considerations and, ideally, in the context of needs arising from within the National Landscape. The impacts of permitting or refusing the development should be clearly identified, including the social, economic and environmental impacts, with specific reference to the impacts upon the natural beauty, special qualities of the CNL, and the economic and social needs (including housing needs) of the local communities affected. Such a statement should be based upon objective assessment and clear evidence.

- b. *'the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way';*

The Board would encourage any such development proposal to be accompanied by a report setting out a sequential approach to site selection. This should evidence the extent to which alternative sites have been assessed before the selection of sites within the National Landscape, and clearly identify why sites outside of the designated area could not be developed. The report should also identify and evidence why the need for the development could not be met in some other way. The report should include relevant evidence of the cost of developing outside of the National Landscape.

- c. *'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated'*.

The Board would expect any such development proposal to be accompanied by a report identifying any detrimental effects upon the environment, the landscape and recreational opportunities. Such a report should relate directly to the special qualities of the National Landscape as a whole as well as those specific to the development site.

Any mitigation identified to moderate these impacts should be:

- clearly detailed, in line with the duty to conserve and enhance the National Landscape,
- be compatible with the objectives of the CNL Management Plan, and
- be capable of realisation through robust planning conditions or obligation.

This Management Plan was adopted by the Cotswolds National Landscape Board February 2025

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board