



Stephanie Eldridge  
Planning and Strategic Housing  
West Oxfordshire District Council  
Elmfield, New Yatt Road  
Witney  
OX28 1PB

By email only to: [stephanie.eldridge@westoxon.gov.uk](mailto:stephanie.eldridge@westoxon.gov.uk)

23 June 2022

Dear Stephanie,

**APPLICATION NO:** 22/01330/OUT

**DESCRIPTION:** Outline application for the construction of up to 150 dwellings with access from Witney Road, open space and associated work

**LOCATION:** Land North of Witney Road Long Hanborough Oxfordshire

The above planning application, which is for a development that would be located within the setting of the Cotswolds National Landscape<sup>1</sup>, has been brought to the attention of the Cotswolds Conservation Board ('the Board').

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.<sup>2</sup> The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications<sup>3</sup>:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Types (LCT) 16 Broad Floodplain Valley;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 16 ([link](#)), including Section 16.1;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Housing Position Statement ([link](#)), Development in the Setting of the AONB ([link](#)), Tranquillity ([link](#)), Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2 now updated in 2021](#), [link 3](#)) and Landscape-Led Development Position Statement ([link](#)).

After having reviewed the information submitted by the applicant, the Board wishes to make a **holding objection** to this application as we consider that the potential impacts of the proposal on the Cotswolds National Landscape have not been adequately assessed.

Paragraphs 174 and 176 of the National Planning Policy Framework provide the highest status of protection for the landscape and scenic beauty of AONBs, including the Cotswolds National Landscape. Paragraph 174 states that planning decisions should both contribute to and enhance the

#### Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

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

[cotswoldsaonb.org.uk](http://cotswoldsaonb.org.uk)

Chairman:  
**Brendan McCarthy**  
Vice Chair:  
**Rebecca Charley**

natural environment by protecting and enhancing valued landscapes in a manner commensurate with their statutory status or identified quality in the development plan.

Paragraph 176 then outlines the ‘great weight’ to be given to the conservation and enhancement of the landscape and scenic beauty of AONBs. This ‘great weight’ is relevant in this instance as the site forms part of the AONB’s setting.

Furthermore, the requirement that development within the setting of AONBs “should be sensitively located and designed to avoid and minimise adverse impacts on the designated areas” was also added into paragraph 176 with the publication of the current NPPF in July 2021. Any adverse effects on the AONB need to be assessed properly and fully taken into account when determining this application, with the appropriate weighting applied in the decision.

The Board’s Position Statement on Development in the Setting of the AONB referred to above outlines how the surroundings of the Cotswolds National Landscape are also important to its landscape character and quality. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB.

The National Planning Policy Guidance (NPPG 2014) also confirms in relation to the Section 85 duty<sup>2</sup> that *“The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.”*

In our response to the previous application relating to an EIA Scoping Opinion for this proposed development (appn. ref. 21/04053/SCOPE, response dated 24 January 2022) we recommended that the Environmental Statement and other documents prepared in support of any forthcoming planning application should have regard to the potential impacts of the proposed development and cumulative impacts when considering other recently consented development in Long Hanborough on the National Landscape, including relevant ‘special qualities’ of the National Landscape. These included:

- views from and to the AONB;
- the dark skies of the National Landscape, including potential increases in light pollution and the introduction of lit elements into night-time views from the National Landscape;
- the relative tranquillity of the National Landscape, including:
  - o potential increases in noise and other visual and aural disturbance;
  - o the % increase in traffic movements on roads in and adjacent to the National Landscape;
- the heritage assets of the National Landscape, and their settings, including Conservation Areas.

The relative tranquillity of the AONB is a ‘special quality’ of the Cotswolds AONB identified in the AONB Management Plan 2018-2023; in other words, it is a feature of the AONB that makes the area so outstanding that it is in the nation’s interest to safeguard it.

Whilst we acknowledge that both the relative tranquillity of the AONB is affected by the noise of the neighbouring built environment of Long Hanborough, the present undeveloped nature of the site helps to prevent the further erosion of this special quality, which may occur if the application were permitted.

The Board’s Tranquillity Position Statement referred to above recommends that proposals that have the potential to impact on the tranquillity of the AONB accord with Policy CE4 of the Cotswolds AONB Management Plan 2018-2023, give great weight to conserving and enhancing the tranquillity of the

AONB and assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements and landscape and visual impacts. Cumulative impacts on tranquillity should also be taken into consideration in such assessments and with regard to the impact of the proposed development combined with other existing or proposed developments. Proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance and measures should be taken to enhance the tranquillity of the Cotswold AONB by (i) removing and (ii) reducing existing sources of noise pollution and other aural and visual disturbance.

Section 4.5 of the Tranquillity Position Statement outlines how the increase in traffic movements on roads in and directly adjacent to the AONB can have a significant impact on the tranquillity of the AONB. It outlines how the Institute of Environmental Assessment's 'Guidelines for the Environmental Assessment of Road Traffic' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment:

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

AONBs are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows. On this basis, it can be argued that an increase in traffic flows of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB.

This matter has not been addressed within the applicant's Environmental Statement and therefore we consider that the applicant has not demonstrated that any additional vehicle movements on local roads within the AONB would not adversely impact the tranquillity of the AONB. We would therefore request an assessment of the cumulative highways impacts in relation to the tranquillity of the AONB; it is understood that the Council and the applicant have agreed a list of sites to be considered in an assessment of cumulative impacts.

Provision of this information by the applicant will also allow the Board an opportunity to further consider issues relating to landscape, visual and cultural heritage impact, given the Board was only alerted to this application a short time ahead of the end of the consultation period.

If you have any queries regarding the information provided in this response, please do not hesitate to get in touch.

Yours sincerely,



Simon Joyce

**Planning Officer**

[simon.joyce@cotswoldsaonb.org.uk](mailto:simon.joyce@cotswoldsaonb.org.uk) | 07808 391227

## NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) The 'special qualities' of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023. The special qualities of the National Landscape are:
  - the aspects of the area's natural beauty which make the area particularly distinctive and valuable, especially at a national scale;
  - the key attributes on which the priorities for the area's conservation, enhancement and management should be based.
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
  - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023  
[www.cotswoldsaonb.org.uk/management-plan](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)