

GLOUCESTER, CHELTEHMAM & TEWKESBURY JOINT CORE STRATEGY DRAFT JOINT CORE STRATEGY

RESPONSE OF THE COTSWOLDS CONSERVATION BOARD

The Cotswolds Conservation Board ('the Board') was established by Parliament in 2004. The Board has two statutory purposes¹:

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

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

The Board wishes to respond to the DJCS as follows:

1. The **Vision** of the Plan is supported.
2. The **Strategic Objectives** of the Plan are supported.
3. **Policy SP1: Scale of New Development.** We welcome the fact that *"The appropriate level of new homes and employment will be monitored and a review undertaken 5 years following the adoption of the JCS and periodically thereafter taking into account the most up to date evidence available at that time."*
4. **Policy SP2: Distribution of New Development** is supported. The Board welcomes Paragraph 3.31 which states that *"It is considered that land within the AONB is not an appropriate location for urban extensions and has therefore been excluded from the site selection process."*
5. **Policy S6: Landscape Policy** is supported. In particular, the Board welcomes the commitment that *"Development will seek to protect landscape character for its own intrinsic beauty and for its benefit to the economic, environmental and social well-being."*
6. **Policy S7: Cotswolds AONB** is supported. It would be helpful if "major development" referred to in the policy was as defined on the Planning Portal: <http://www.planningportal.gov.uk/PpApplications/genpub/en/FormChooserWizard?action=chooseMajorOrMinor&siteArea=createApp&consentTypeValue=4&primaryPermissionType=4&countyMatterSelection=none&Next.x=25&Next.y=11>

The Board welcomes the references therein to the Cotswolds AONB Management Plan. Please note in paragraph 4.70 the dates of the AONB Management Plan are 2013-18, not 2013-16.

7. **Policy S8: Built and Historic Environment** is supported.

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

8. **Policy S9: Conservation and Improvement of Biodiversity & Geodiversity** is supported. The Board welcomes the reference to Nature Improvement Areas in this Policy, but would request that the wording be changed to "...such as enhancements to the Cotswolds Scarp Nature Improvement Area." [The Cotswolds Scarp NIA has been developed by the Cotswolds Ecological Networks Forum, under the Board's leadership]. With regard to development affecting locally designated sites, the Board would like to see the word 'adjacent' replaced with 'close to' since some sites which are important for, say nesting wading birds, could be critically affected by non-adjacent development.
9. **Policy S10: Green Infrastructure** is supported.
10. **Policy S11: Renewable Energy/Low Carbon Energy Development** is supported.
11. **Policy C1: Residential Development.** This policy states that *"proposals for housing development on greenfield land, other than in urban extensions and strategic allocations identified in the Joint Core Strategy, district plans or neighbourhood plans will only be permitted where... it is infill development within the existing built up areas of villages"*. This implies that all infill development may be permissible. The wording needs to be amended so that it makes clear that *infill* development will not be permitted where it is not in accordance with district and neighbourhood plans.
12. **Policy C3: Affordable Housing** – whilst supporting the principle of this policy, the Board is concerned that no percentage of affordable housing to be met is set out in the policy.
13. **Policy D3: Transport Assessments and Travel Plans** is supported. As noted below in detail in relation to Policy A8, the impact of increased traffic arising from new development generally on the tranquillity of the Cotswolds AONB will require assessment and mitigation.
14. **Policy A6: South Cheltenham - Leckhampton urban extension, Cheltenham.** The Board would suggest that an additional criterion is required so that any design protects views of the Cotswolds escarpment. In this context consideration should be given to designating this land as Local Green Space as part of the process of preparing the JCS as is provided for in the National Planning Policy Framework (paragraphs 76 and 77).
15. **Policy A8; MOD Site at Ashchurch Strategic Allocation.** The Board notes that the site is located within 1.25 miles of the Cotswolds AONB. While supporting the principle of this policy, the Board is concerned that the site could have a negative impact on views out of the AONB from Bredon Hill. This impact could be mitigated by increasing the width of the proposed green infrastructure corridor to a minimum of 50m. Provided this green infrastructure took the form of native woodland, it would significantly screen the site from the AONB in the medium to long term. It should be noted that this site is located immediately adjacent to the Cotswolds Scarp Nature Improvement Area, and that a strip of woodland in this location would be in accordance with the purposes of the NIA.

The Board is also concerned about the effect of traffic generated by the addition of 2000-3000 houses so close to the AONB. In particular, the Board would seek to mitigate the incidence of 'rat-running' through the AONB villages of Beckford, Conderton, Overbury, Kemerton and Westmancote. Mitigation could be achieved by preventing direct vehicular access from the site onto Aston Fields Lane, which is narrow and unsuitable for significant levels of traffic. However, this would require slightly reducing extent of the site, in order to exclude the small area located north the lane. The Board suggests that Policy A8 specifies that Aston Fields Lane should be developed as a green infrastructure corridor for pedestrians and cyclists.

16. The Board has no specific adverse comments to make on objectives and policies in the draft Core Strategy not referred to above.

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Cotswolds Conservation Board.
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