

THE IMPLICATIONS OF THE NEW NATIONAL PLANNING POLICY FRAMEWORK FOR THE COTSWOLDS NATIONAL LANDSCAPE

Summary: An overview of the potential implications of the new National Planning Policy Framework for the Cotswolds National Landscape.

Recommendation: That the Executive Committee notes the report.

Report by: John Mills, Planning Lead

INTRODUCTION

- Nigel Adcock, Local Authority Board Member
- David Broad, Parish Council Board Member
- Liz Hodges, Parish Council Board Member
- Graham Hopkins, Secretary of State (SoS) Board Member (Chair)
- Cate Le Grice Mack, SoS Board Member
- Caroline Mumford, Cotswold Voluntary Warden
- Ray Sanderson, Parish Council Board Member
- Officers: John Mills, Planning Lead; Simon Joyce, Planning Officer

PIWG MEETINGS SINCE THE LAST EXECUTIVE COMMITTEE

- The last PIWG meeting was on 9 December 2024. At this meeting we discussed: the 'seek to further' duty; a proposal for 600-900 dwellings at Chipping Campden, which is being promoted as a potential allocation in the next iteration of the Cotswold District Local Plan; and the consultation on the proposed M5 Junction 9 and A46 (Ashchurch) Transport Scheme.

KEY PERFORMANCE INDICATOR (KPI) DATA

- In Q3 (October - December 2024) we provided a substantive response to 90% (19/21) of pro-active planning applications consultations, above our primary consultation thresholds, by the original deadline. In Q2, this figure was 78% (14/18) and in Q1 it was 96% (24/25). For reference, the average for 2023/24 was 86% (86/100). Our target range is 70-94%.

OTHER PLANNING-RELATED QUARTERLY DATA

- In Q3, we commented on 23 'major' planning applications. In Q2, this figure was 17 and in Q1 it was 20. For reference, the total for 2023/24 was 89 responses (i.e. average of 22 per quarter).
- In Q3, we commented on 28 'minor' planning applications. In Q2, this figure was 28 and in Q1 it was 23. For reference, the total for 2023/24 was 100 responses (i.e. average of 25 per quarter).
- In Q3, decisions were made on 7 development management proposals that we had objected to and hadn't withdrawn our objection to. 6 of these were refused, withdrawn or disposed of (i.e. in line with the Board's recommendations) and one

was permitted. So, in Q3, 86% (6 out of 7) were in line with the Board's recommendations. In Q2, this figure was 67% (2 out of 3) and in Q1 it was 86% (6 out of 7). The average for Q1-Q3 is 82% (14 out of 17). For reference, the average for 2023/24 was 54% (15 out of 28).

OTHER PLANNING-RELATED ACTIVITY

- Other planning-related activity since the last PIWG report for the Executive Committee meeting on 17 September 2024 includes:
 - **National Planning Policy Framework (NPPF) consultation:** Submitted the Board's response to the NPPF consultation on 24 September (N.B. Also drafted the National Landscape Association's response).
 - **Local Plan consultations:**
 - **Cotswold District Local Plan:** In December, we provided detailed comments, at the request of the site promoter, on a site that a developer is promoting as a potential allocation in the Local Plan. The site is at Chipping Campden and would provide 600-900 dwellings. We made it clear that we would not support the proposal. This is because: it would not demonstrate the exceptional circumstances that are required to justify major development; it would be completely disproportionate to the scale of the existing settlement; and it would have significant adverse effects on the natural beauty of the CNL.
 - **Wiltshire Local Plan:** In October, we provided comments on a draft Statement of Common Ground (SOCG), prepared by Wiltshire Council, which also related to the Cranborne Chase National Landscape and North Wessex Downs National Landscape. All three National Landscapes were concerned that the draft SOCG did not adequately address the comments that we had made on the draft Local Plan.
 - **Significant planning-related decisions:**
 - **22/02935/FUL - Anaerobic digester, Tysoe Road, Kineton (Stratford on Avon District Council):** Two years after submission, the applicant withdrew their application for 5 x 17m high biodigester domes and associated development within the CNL's setting near Tysoe. We objected due to the likely significant adverse landscape and visual impacts on views from the Cotswold escarpment including from sections of the Macmillan Way and Centenary Way promoted footpaths and a significant adverse impact upon the tranquillity of the National Landscape due to HGV journeys to and from the site on routes through the CNL. Simon also provided advice in relation to CNL matters to local Parish Councils and action groups in raising their objections.
 - **Significant planning applications that we have objected to (since the last Executive Committee meeting):**
 - **24/02608/FUL - 'Landscape Observatory', Daylesford Estate, Kingham (West Oxfordshire District Council):** The Board objected

to this application for several reasons, principally as, due to its design and prominent isolated location within an otherwise agricultural setting, the proposal would give rise to significant adverse effects upon landscape character and for receptors located at multiple viewpoints within the CNL.

- **23/00327/FUL - New dwelling in compliance with NPPF paragraph 84e, Greenway Lane, Shurdington (Tewkesbury Borough Council):** The Board maintained our objection to this application for a large residential dwelling in a prominent location on the Escarpment adjacent to the Cotswold Way due to insufficient information having been submitted by the applicant to demonstrate that it would not give rise to unacceptable landscape and visual impacts.
- **Miscellaneous:**
 - **24/02171/FUL – 26 dwellings and associated development, Woodstock Road, Charlbury (West Oxfordshire District Council):** This application is a revised submission of an application (WODC ref. 23/02399/FUL) refused by WODC earlier in 2024. It features a reduced number of dwellings and a number of revisions designed to overcome the Council's previous refusal. The Board's response remained in line with our previous stance of not objecting to the scheme but made recommendations relating to landscaping and lighting to be addressed by the imposition and monitoring of appropriately-worded planning conditions.
 - **Defra's 'Protected Landscapes Regulations External Working Group (EWG)':** John has accepted a request, from Defra, to be a member of this EWG. The purpose of the EWG is to provide input into the development of regulations relating to: (i) the 'seek to further' duty; (ii) how relevant authorities should contribute to the preparation, implementation and review of protected landscape management plans; and (iii) how protected landscape management plans should contribute to delivering targets in the Environment Act 2021. The first meeting of the EWG was held on 8 January 2025. In the meeting Defra set out their proposed steps and timescales for developing these regulations, which they hope to be in place by the end of 2026.
 - **Cotswolds Visual Impact Provision (VIP) Project:** In October, John carried out a site visit to the sites of the proposed cable sealing end compounds (CSECs) at Postlip and Whittington, with Mark Connelly and National Grid and their consultants. We subsequently supported the planning applications for the two CSECs, which are key components of the wider scheme to underground approximately 7km of high voltage cables and remove the associated pylons.
 - **Undergrounding of electricity cables (smaller scale projects):** In December, we developed an Expression of Interest (EoI) for a project to underground approximately 1km of electricity cables at the National Trust's Tinkley Gate site, south of Stroud. We secured approval to work with National Grid and the National

Trust to progress this to a full project proposal, which we hope will be approved in March 2025. The project would cost approximately £200,000, with these costs being covered by National Grid.

- **M5 Junction 9 and A46 (Ashchurch) Transport Scheme consultation:** Gloucestershire County Council (GCC) held a consultation on this proposed scheme in autumn 2024. The scheme would involve an additional junction on the M5 near Tewkesbury and a new section of the A46 between this junction and the Teddington Hands roundabout, east of Tewkesbury. In effect, it would act as a Tewkesbury by-pass. It would be a nationally significant infrastructure project (NSIP). The consultation put forward various route options. We submitted a consultation response in December, in which we recognised the need for the scheme and addressed the potential impacts of each option on the natural beauty of the CNL. We put forward an additional option, for further consideration, which would involve closing the section of the A435 that runs along the CNL boundary and re-purposing it as a recreational route. We concluded by stating that further assessments would be required in order to identify the option(s) that would be least harmful to the natural beauty of the CNL.
- **Southern Protected Landscapes Planning Officers Group (SPLPOG):** John chaired the SPLPOG meeting on 18 September.
- **Management Plan:** John provided input into the development of the 2025-2030 iteration of the Cotswolds National Landscape Management Plan included advising on how planning-related issues that were raised in the consultation responses should be addressed.
- **Woodland Opportunity Mapping:** John provided input into the development of the Board's Woodland Opportunity Mapping, including commenting on the draft methodologies.
- **Dark Skies guidance:** John provided input into the development of the Board's draft Dark Skies guidance.

DECISIONS REQUIRED

- No decisions required.

NEXT STEPS

- Key work areas over the next few months will include:
 - Local Plan consultations - South Warwickshire; Cherwell; South Worcestershire (examination).
 - Defra's Protected Landscapes Regulations External Working Group, including providing input on initial, 'skeleton' draft of regulations on the 'seek to further' duty.
 - Feeding into finalising the CNL Management Plan.

- Writing and consulting on a new Minerals & Waste Position Statement and reviewing / updating other position statement in light of changes to the National Planning Policy Framework.
- Reviewing the role of PIWG in monitoring the planning-related targets and indicators in the CNL Management Plan.
- Next PIWG meeting = 28 April 2025.

NO SUPPORTING PAPERS

JANUARY 2025