Cotswolds National Landscape Board
Position Statement

Preparing Neighbourhood Plans

March 2023

1.0 CONTEXT

The Cotswolds National Landscape[i] is a landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it.[ii] The statutory purpose of its designation is to conserve and enhance the natural beauty of the area.[iii]

The Cotswolds National Landscape is also a living and working landscape in which the social and economic well-being of local communities are important considerations. The neighbourhood planning process can be used to ensure these communities, both within the Cotswolds National Landscape and its setting, remain vibrant and thriving through delivering development in a way that is compatible with the purpose of conserving and enhancing the natural beauty of the National Landscape.

There is also a legal duty[iv] upon a *"relevant authority"* to have regard to the purposes of conserving and enhancing the natural beauty of Areas of Outstanding Natural Beauty (AONBs), including the Cotswolds National Landscape. Parish Councils and Neighbourhood Plan forums are 'relevant authorities' in this respect. By following the guidance and recommendations in this Position Statement, these bodies will be helping to ensure that they fulfil this duty when preparing or updating their Neighbourhood Plans.

2.0 PURPOSE OF THE BOARD'S POSITION STATEMENTS

The primary purpose of the Board's position statements is to expand on relevant policies in the Cotswolds National Landscape Management Plan. They provide further context, guidance and recommendations in relation to specific planning matters and associated issues. They are not intended to create, dictate or propose new policies.

The Board's position statements are also intended to help local authorities, communities, developers and other relevant stakeholders:

- to have regard to – and positively contribute to - the purpose of conserving and enhancing the natural beauty of the Cotswolds National Landscape;
- to ensure that the purpose of AONB designation is not compromised by development and that the natural beauty of the Cotswolds National Landscape is conserved and enhanced;
- to fulfil the requirements of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) with regards to AONBs and the factors that contribute to their natural beauty;

- to take account of relevant case law;
- to have regard to and be consistent with the Cotswolds National Landscape Management Plan and guidance published by the Board;
- to emulate best practice in the Cotswolds National Landscape and other protected landscapes;
- to develop a consistent and coordinated approach to relevant issues across the whole of the Cotswolds National Landscape and its setting.

3.0 STATUS OF THE POSITION STATEMENT

The Board's position statements are supplementary – and subsidiary - to the Cotswolds AONB Management Plan. However, it is worth noting that the Cotswolds AONB Management Plan 2023-2025 states that development proposals in the Cotswolds National Landscape and its setting should be compatible with the AONB Management Plan and with guidance produced by the Cotswolds Conservation Board, including the Board's position statements. As such, for development proposals to be compatible with the AONB Management Plan, they should also be compatible with the relevant position statements.

The AONB Management Plan may be a material consideration in planning decisions. However, we acknowledge that, in a plan-led planning system, it is the policies of the relevant local authority development plan that have the greatest weight in planning decisions and provide the starting point for the determination of planning applications. As such, within this planning system, the hierarchy of documents sees the local authority development plan positioned above the AONB Management Plan and position statements respectively.

In some instances, some of the guidance and / or recommendations in the Board's position statements might go further than the policies of current development plans. Hopefully, as new iterations of the local authority development plans are developed, we hope that the guidance and recommendations from the position statements will be incorporated into these new iterations.

4.0 WHERE SHOULD NEIGHBOURHOOD PLANS START WHEN CONSIDERING THE COTSWOLDS NATIONAL LANDSCAPE DESIGNATION?

The Cotswolds National Landscape Board was established by Parliament in 2004 as the Cotswolds Conservation Board and has two statutory purposes:

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 well-being 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 National Landscape.

Section 85 of the Countryside and Rights of Way Act 2000 confirms that it is a legal duty for a *"relevant authority"* to have regard to the purposes of conserving and enhancing the natural beauty of the area of outstanding natural beauty (AONB). This duty applies individually to

public servants down to Parish Council level, including those engaged with Neighbourhood Planning, as well as planning officers and statutory agencies who may be advising on the Neighbourhood Plan process.

Accordingly, the Government has also confirmed within the plan-making and decision-making process, that there should be a strategic approach to AONBs and the conservation and enhancement of natural beauty.

It has stated the following:

- There is a need to protect and enhance the natural environment (paragraph 8 of the NPPF);
- Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscape in a manner commensurate with their statutory status or identified quality in the development plan and recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland (paragraph 174 of the NPPF);
- 'Great weight' should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs which have the highest status of protection in relation to these issues (paragraph 176 of the NPPF);
- AONBs are one such location where *"the scale and extent of development should be limited"* and accordingly the *"presumption in favour of sustainable development"* does not automatically apply. (paragraph 176 and footnote 7 to paragraph 11 of the NPPF);
- Development within the setting of the AONB should be sensitively located and designed to avoid or minimise adverse impacts on the designated area (paragraph 176 of the NPPF) and will therefore need sensitive handling that takes potential impacts into account (NPPG paragraph 042 Natural Environment, July 2021);
- Planning permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated to be in the public interest (paragraph 177 of the NPPF); and
- AONB Management Plans help set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications. (PPG paragraph 040 Natural Environment, July 2019).

5.0 WHAT ARE THE FACTORS THAT CONTRIBUTE TO THE COTSWOLDS NATIONAL LANDSCAPE DESIGNATION?

The statutory purpose of designation of the Cotswolds National Landscape is to conserve and enhance the natural beauty of the area, however it is important to consider all of the factors that contribute to natural beauty when preparing a Neighbourhood Plan.

These factors include:

- landscape quality / beauty;[v]
- scenic quality / beauty;[vi]

- relative tranquillity[vii] (including 'dark skies'[viii]);
- relative wildness;
- natural heritage (including 'biodiversity');[ix]
- cultural heritage (including 'historic environment');[x]
- the special qualities of the Cotswolds National Landscape.[xi]

These factors should be assessed:

- individually (i.e. in their own right, in the context of national planning policy and relevant best practice guidance);
- collectively (i.e. in terms of their contribution to the AONB designation); and
- cumulatively (i.e. in terms of the increasing level of significance associated with the presence of – or potential impacts on - multiple factors).

A number of other national designations which affect land are also confirmed in the NPPF as where development should be "restricted" and such designations should be considered in tandem with the AONB designation within any Neighbourhood Plan as they are considered to contribute to the conservation and enhancement of natural beauty. These include:

- Sites protected under the Birds and Habitats Directive;
- Sites of Special Scientific Interest;
- Local Green Space;
- World Heritage Sites and their settings;
- Ancient Monuments and their settings;
- Listed Buildings and their settings; and
- Conservation Areas and the contribution their surroundings make to their special character or appearance.

These designations may also be 'nested' within one another. Areas where this occurs are likely to be especially sensitive to inappropriate change.

6.0 HOW SHOULD NEIGHBOURHOOD PLANS MAKE REFERENCE TO THE COTSWOLDS NATIONAL LANDSCAPE DESIGNATION?

For those communities located with the National Landscape or within its setting, Neighbourhood Plans provide the opportunity to make reference to the legally protected status of the National Landscape, the relevant planning policies contained within the Cotswolds AONB Management Plan and the Board's accompanying guidance and Position Statements linked within this document.

We recommend that the existence of the AONB designation should be considered at the very outset in plan preparation and should influence the plan in terms of any allocation site choice, access issues, green infrastructure, Community Infrastructure Levy, use of natural resources, nature recovery or climate change adaptation and mitigation activities and in terms of policies relating to landscape and environmental protection.

The Board recommends that Neighbourhood Plans should acknowledge the 'special qualities' of the area and include references to the current Cotswolds National Landscape Management Plan and its vision, outcomes and policies. It is also recommended that Neighbourhood Plans refer to the AONB and/or landscape policies from their relevant Local Plans and to relevant Government policy on protected landscapes.

The 'special qualities' of an AONB are those aspects of the area's natural beauty which make the area distinctive and which are valuable, especially at a national scale. Some of the 'special qualities' of the Cotswolds listed within the Cotswolds National Landscape Management Plan (link, page 18) include the Cotswold escarpment and views from it (which may be referred to in relevant Local Plan policies), river valleys, dry stone walls, internationally important flower-rich limestone grassland, the tranquillity of the area, its dark skies, distinctive settlements, historic assets and cultural associations, features and landscapes.

More guidance on the AONB designation is available within Local Plans and Neighbourhood Plan groups should discuss issues around Sustainability Appraisals (SA) and Strategic Environmental Assessments (SEA) with their relevant Local Planning Authorities from the outset.

7.0 WHAT OTHER INFORMATION AND GUIDANCE IS PROVIDED BY THE COTSWOLDS NATIONAL LANDSCAPE BOARD?

The Board has published detailed guidance which should form a key resource in the drafting of Neighbourhood Plans for communities located within the National Landscape and its setting.

For example, an important aspect of Neighbourhood Plans is where they identify 'important views' and this provide an opportunity for communities to expand on the work already undertaken by the Board through its Landscape Character Assessment (2004, link), its Landscape Strategy and Guidelines (2016, link) and associated document Local Distinctiveness and Landscape Change (2003, link) in recording the specific characteristics and special qualities of each Neighbourhood Area. These documents provide guidance on the character, distinctiveness and qualities of each area of the Cotswolds, which Neighbourhood Plans can directly refer to.

When selecting and evidencing 'important views' in a Neighbourhood Plan we recommend that consideration is given to relevant special qualities (particularly with regards to the Escarpment and High Wold if appropriate) and to relevant 'key features / characteristics of the relevant Landscape Character Type' which can be found within the Landscape Character Assessment. It is also important that, where appropriate, consideration is given to views from locations that lie outside the Neighbourhood Area but where development within the Neighbourhood Area could adversely affect those views.

Help can also be provided by the Board on request through the Neighbourhood Plan drafting process as to which guidance is relevant to any particular area. We recommend that any Neighbourhood Plans which cover areas wholly or partly within the National Landscape, or which could be considered as being within its setting, should consider the following:

- The Cotswolds National Landscape in planning policy and in Local Plan policy;
- The Cotswolds National Landscape Management Plan 2023-2025 (link to be updated shortly with new Management Plan document), in particular its objectives, policies and actions;
- The primary purpose of AONB designation to 'conserve and enhance natural beauty';
- The duty on all relevant authorities including Parish Councils to consider the AONB status in any land use/environment decisions (Section 85 of the Countryside and Rights of Way Act 2000);

- Where site allocations are proposed, use of the attached checklist to help decide in the planning balance the most suitable location and scale of development;
- Adherence to paragraphs 176 and 177 of the NPPF through the site allocation process (if the Neighbourhood Plan seeks to allocate sites);
- The Cotswolds Landscape Character Assessment (2004, link), Cotswolds Landscape Strategy and Guidelines (2016, link) and Cotswolds Local Distinctiveness and Landscape Change report (2003, link) and additional Local Planning Authority landscape studies; and
- Other Board publications and Position Statements including:
    - Cotswolds National Landscape Nature Recovery Plan (2021, link);
    - Cotswolds National Landscape Climate Change Strategy (2022, link);
    - Planning and Development Position Statements:
        - Housing (2021, main document and appendices);
        - Landscape-led Development (2021, main document and appendices);
        - Development in the Setting of the AONB (2016, link);
        - Minerals and Waste Planning (2013, link);
        - Transport (2013, link);
    - Energy Position Statements:
        - Renewable Energy (2014, link);
        - Unconventional Gas Prospectivity Briefing Paper (2019, link);
        - Miscanthus (2013, link);
        - Energy Guide (2014, link);
    - Special Qualities:
        - Tranquillity (2019, link);
        - Dark Skies & Artificial Light (2019, main document and Appendix A, Appendix B and Appendix C);
    - Land Management:
        - Keeping of Horses and Ponies (2017, link);
        - Management of Roadside Verges (2015, link);
        - Management of Wild Deer (2017, link);
        - Tree Species and Provenance (2017, link)

The Board also recommends that groups preparing or reviewing a Neighbourhood Plan in a community located within the National Landscape or its setting should also refer to The Campaign for the Protection of Rural England's (CPRE) national advice for landscape and neighbourhood planning (link) which has further helpful information on assessing landscape character and developing Neighbourhood Plan policies that integrate landscape issues.

A further document, *'Touching the Tide: A Guidance Note for preparing Neighbourhood Plans'* produced by the Dedham Vale and Suffolk Coast & Heaths AONBs (link) also includes helpful information and guidance that can be used by groups engaging in neighbourhood planning in protected landscapes across the country.

Further recommendation guidance can be found within Annex 2 of this Position Statement.

8.0 WHAT GUIDANCE CAN THE COTSWOLDS NATIONAL LANDSCAPE BOARD PROVIDE ON ALLOCATING SUITABLE LAND FOR DEVELOPMENT?

Whilst not mandatory to do so, a Neighbourhood Plan can allocate specific sites for development, including housing. Whilst the Cotswolds National Landscape is a landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it, it is also a living and working landscape in which the social and economic well-being of local communities are important considerations.

However, as outlined in our Landscape-led Development Position Statement and our Housing Position Statement, these aspirations (including housing provision) need to be delivered in a way that is compatible with – and positively contributes to - the statutory purpose of designation to conserve and enhance the natural beauty of the area.

The Housing Position Statement advocates two over-arching principles for housing development within the Cotswolds National Landscape and its setting:

- Housing development within the Cotswolds National Landscape and, where relevant, in its setting, should be 'landscape-led'.
- Housing development within the Cotswolds National Landscape should be based on robust evidence of local need arising within the National Landscape.

The Housing Position Statement further provides the Board's guidance and recommendations regarding an assessment of housing need vs. housing requirements, affordable housing provision and evidence of local need and second homes which will be relevant considerations in neighbourhood planning.

As far as assessing individual sites is concerned, Locality has prepared a guide on how to assess and allocate sites for development (link), which is a useful starting point. When considering the allocation of development sites within the National Landscape, paragraph 175 of the NPPF advises that *"Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework"*. Footnote 58 further clarifies that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Both the Housing Position Statement and the Landscape-Led Development Position Statement outline a number of our recommendations and considerations relating to the location and design of new development within the National Landscape and its setting which will be important factors when assessing potential allocation sites. These reflect the Government's planning practice guidance which states that *"all development in … AONBs will need to be located and designed in a way that reflects their status as landscapes of the highest quality"* (PPG Natural Environment & Landscape, paragraph 041). This guidance also states that poorly located or designed development in the setting of AONBs *"can do significant harm"* to the landscape and scenic beauty of the AONBs. It adds that *"development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account"* (PPG Natural Environment & Landscape, paragraph 042).

9.0 WHAT SHOULD BE TAKEN INTO ACCOUNT WHEN CONSIDERING 'MAJOR DEVELOPMENT' WITHIN THE NATIONAL LANDSCAPE IN A NEIGHBOURHOOD PLAN?

When considering 'major development' within the Cotswolds National Landscape, paragraph 177 of the NPPF confirms:

"When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development[60] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications 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;
B) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
C) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."

Footnote 60 outlines that for the purposes of paragraphs 176 and 177, 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.

Therefore, amongst material considerations, national policy gives the conservation of landscape and scenic beauty in an AONB a particular enhanced status. As well as any detrimental effect of the development on the landscape, this national policy requires the planning decision-maker to assess, and take into consideration, the need for the development and the scope for meeting the assessed need in some other way.

It should be noted that where an area is covered by or adjacent to other statutory designations, similar considerations can apply. The key is the balancing test of the need for development versus conservation interests and the goal of *'sustainable development'*, though mindful of the fact that the conservation and enhancement of landscape and scenic beauty of the National Landscape is afforded *'great weight'* in the decision-making process.

As such, both the Housing Position Statement and the Landscape-Led Development Position Statement outline a number of our recommendations and considerations relating to major development within the National Landscape and its setting.

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ANNEX 1: WHAT IS NEIGHBOURHOOD PLANNING?

In very simple terms, a neighbourhood plan is:

- A document that sets out planning policies for the neighbourhood area – planning policies are used to decide whether to approve planning applications;
- Written by the local community rather than the Local Planning Authority;
- A powerful tool to ensure the community gets the right types of development, in the right place.

Neighbourhood plans are defined in the Glossary to the National Planning Policy Framework ('NPPF', July 2021) as "*a plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004"*.

National Planning Practice Guidance further outlines how *"Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area."* (National Planning Practice Guidance ('PPG') Paragraph 001 Reference ID 41-001-20190509, 09.05.2019).

Paragraph 29 of the NPPF states that *"Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies"*. Footnote 18 makes it clear that Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

Paragraph 30 of the NPPF continues *"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently"*.

ANNEX 2: FURTHER SUGGESTED NEIGHBOURHOOD PLANNING GUIDANCE FOR COMMUNITIES WITHIN THE COTSWOLDS NATIONAL LANDSCAPE AND ITS SETTING

Additional guidelines on the preparation of Neighbourhood Plans are contained within the National Planning Policy Framework (NPPF, July 2021) and the National Planning Practice Guidance (NPPG, May 2019): https://www.gov.uk/guidance/neighbourhood-planning--2 .

Locality (https://neighbourhoodplanning.org/) provides a wide range of support and advice for groups engaged in Neighbourhood Planning including a number of roadmaps and toolkits relating to evidence gathering, policy writing and public consultation and engagement.

Local Planning Authorities have a 'duty to support' parish councils and designated Neighbourhood Forums with facilitating the preparation of Neighbourhood Plans. Every Local Planning Authority will maintain an online evidence base that is used for its Local Plan which may also be useful when preparing a Neighbourhood Plan. For example, Landscape Sensitivity Assessments that are produced as part of the Local Plan-making process might be a useful reference point.

The following is a list of links to Neighbourhood Planning information and resources provided by Local Planning Authorities within the Cotswolds National Landscape:

- Bath and North East Somerset Council: https://beta.bathnes.gov.uk/neighbourhood-planning
- Cheltenham Borough Council: https://www.cheltenham.gov.uk/info/46/planning_policy/1155/neighbourhood_plans
- Cherwell District Council: https://www.cherwell.gov.uk/NeighbourhoodPlans
- Cotswold District Council: https://www.cotswold.gov.uk/planning-and-building/planning-policy/neighbourhood-planning/
- Oxfordshire County Council: https://www.oxfordshire.gov.uk/sites/default/files/file/planning-planning-policy/OxfordshireCountyCouncilNeighbourhoodPlanningGuide.pdf
- South Gloucestershire Council: https://beta.southglos.gov.uk/neighbourhood-planning
- Stratford-on-Avon District Council: https://www.stratford.gov.uk/planning-building/neighbourhood-plans.cfm
- Stroud District Council: https://www.stroud.gov.uk/environment/planning-and-building-control/planning-strategy/neighbourhood-planning
- Tewkesbury Borough Council: https://www.tewkesbury.gov.uk/neighbourhood-planning
- Warwickshire County Council: https://www.warwickshire.gov.uk/neighbourhoodplanning
- West Oxfordshire District Council: https://www.westoxon.gov.uk/planning-and-building/planning-policy/neighbourhood-planning/
- Wiltshire Council: https://www.wiltshire.gov.uk/planning-neighbourhood
- Worcestershire County Council: https://www.worcestershire.gov.uk/info/20015/planning_policy_and_strategy/1406/neighbourhood_planning_support
- Wychavon District Council: https://www.wychavon.gov.uk/planning/planning-policy/neighbourhood-planning

There is also a wide range of additional guidance available for example from the Planning Advisory Service and the CPRE:

- Communities and Local Government Neighbourhood Planning
- Notes on Neighbourhood Planning
- Royal Town Planning Institute (Planning Aid)
- Historic England
- CPRE
- My Community Rights
- Neighbourhood Planning Road Map Guide
- Planning Advisory Service

Footnotes

[i] Cotswolds National Landscape is the new name for the Cotswolds Area 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. This Position Statement uses the name Cotswolds National Landscape (CNL) for the area designated as the Cotswolds AONB. At times it is abbreviated to National Landscape. AONB is still the legal designation and is used within this Position Statement when referring to AONBs outside of the Cotswolds and the designation nationally. The name used for the organisation associated with the designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape 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.

[ii] Section 82 of the Countryside and Rights of Way Act 2000 (link). See also Appendix 1 of the Cotswolds AONB Management Plan 2018-2023 for further information (link).

[iii] Defra (2019) *Areas of Outstanding Natural Beauty: technical support scheme (England) 2019 to 2020* (link).

[iv] Section 85 of the Countryside and Rights of Way Act 2000 (link)

[v] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link). Policy CE1 (Landscape).

[vi] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link). Policy CE1 (Landscape).

[vii] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link), Policy CE4 (Tranquillity), and the Board's Tranquillity Position Statement (link). Relevant assessments would include noise assessments and traffic assessments.

[viii] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link), Policy CE5 (Dark Skies), and the Board's Dark Skies & Artificial Light Position Statement (link) and its appendices A (link), B (link) and C (link). Relevant assessments would include light pollution assessments.

[ix] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link). Policy CE7 (Biodiversity). Relevant assessments would include Habitats Regulations Assessments (where relevant) and Ecological Impact Assessments. Key considerations will include the extent to which development proposals deliver net-gains in biodiversity and contribute to the objectives of Nature Recovery Strategies and Nature Recovery Plans. It is likely that the Board will develop a new 'Planning & Biodiversity' Position Statement once the new requirements of the Environment Act have been implemented.

[x] See also Cotswolds Conservation Board (2018) *Cotswolds AONB Management Plan 2018-2023* (link), Policies CE6 (Historic Environment and Cultural Heritage) and CC4 (Natural and Cultural Capital and Ecosystem Services), and the Board's 'Conserving and Celebrating Cultural Capital in the Cotswolds AONB' Position Statement (link).

[xi] The 'special qualities' of the Cotswolds National Landscape are listed in Chapter 2 of the Cotswolds AONB Management Plan 2018-2023. These special qualities are the aspects of the area's natural beauty that make the area distinctive and which are particularly valuable, including at a national scale. They are also the key attributes on which the priorities for the area's conservation, enhancement and management should be based.