

Cotswolds National Landscape: area of outstanding natural beauty

Management Plan 2025 – 2030 Consultation Draft

This title follows the format Defra are being consulted on by the National Landscapes Association.

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.

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

Contents

A note on terminology	1
Contents at a glance.....	5
Executive summary	6
Chair’s foreword.....	8
1. Introduction	9
Management Plan – context	9
What is the Cotswolds National Landscape?	9
What is the Cotswolds National Landscape Board?	10
What is the Cotswolds National Landscape Management Plan?	10
Why do we have a Cotswolds National Landscape Management Plan?	11
Who will deliver the Cotswolds National Landscape Management Plan?	11
How will the Cotswolds National Landscape Management Plan be delivered?	11
How will the delivery of the Cotswolds National Landscape Management Plan be monitored?	12
Management Plan – process	12
Management Plan – structure and use.....	12
2. Vision.....	15
A Cotswolds vision: a National Landscape for everyone.....	15
A time of opportunity	15
Challenges lie ahead	15
What can we do, and how should we do it?.....	15
The future should be bright	15
3. Key issues	16
Key Issue 1 - The climate emergency	16
Key Issue 2 - Nature’s decline and the ecological crisis	17
Key Issue 3 - Health and societal changes.....	18
4. The special qualities of the Cotswolds National Landscape	19
5. Cross cutting themes.....	20
The climate emergency	20
Outcome 1 – Climate action:.....	20
Policy CC1: Climate change – mitigation	20
Policy CC2: Climate change – adaptation.....	22
Working together	23
Outcome 2 – Working together:	23
Policy CC3: Compliance with section 85 of the Countryside and Rights of Way Act	23

Policy CC4: Working in partnership.....	23
6. Conserving and enhancing	24
Landscape.....	24
Outcome 3 – Landscape:.....	24
Policy CE1: Landscape	25
Policy CE2: Geology and Geomorphology.....	26
Policy CE3: Natural and cultural capital – principles	26
Local distinctiveness.....	27
Outcome 4 – Local distinctiveness:.....	27
Policy CE4: Local distinctiveness	27
Tranquillity	28
Outcome 5 – Tranquillity:.....	28
Policy CE5: Tranquillity	28
Dark skies	29
Outcome 6 – Dark skies:	29
Policy CE6: Dark skies.....	29
Historic environment and cultural heritage	30
Outcome 7 – Historic environment and cultural heritage:	30
Policy CE7: Historic environment and cultural heritage.....	31
Nature recovery and biodiversity.....	33
Outcome 8 – Nature recovery and biodiversity:	33
Policy CE8: Nature recovery and biodiversity	33
Water.....	37
Outcome 9 The water environment.....	37
Policy CE9: Water	37
Farming and land management	40
Outcome 10 – Farming and land management:	40
Policy CE10: Farming and land management.....	40
Policy CE11: Problem species, pests and diseases	43
Policy CE12: Soils.....	44
Development and transport.....	45
Outcome 11 – Development and transport:	45
Policy CE13: Development and transport – principles.....	45
Policy CE14: Major development	47
Policy CE15: Development priorities and evidence of need	50
Policy CE16: Waste management and the circular economy	53

7. Increasing understanding and enjoyment	55
Health and wellbeing	55
Outcome 12 – Health and wellbeing:.....	55
Policy UE1: Health and wellbeing	55
Access and recreation	56
Outcome 13 – Access and recreation:	56
Policy UE2: Access and recreation	56
Sustainable tourism	58
Outcome 14 – Sustainable tourism:.....	58
Policy UE3: Sustainable tourism.....	59
8. Delivery and monitoring	61
Cotswolds National Landscape Board delivery	61
Stakeholder delivery	61
Monitoring	61
9. Appendices.....	62
Appendix 1: National Landscape (AONB) designation	62
Appendix 2: Natural beauty	63
Appendix 3: Cotswold National Landscape Board	65
Appendix 4: The “seek to further” duty.....	67
Appendix 5: Stakeholder delivery – priority actions	71
Appendix 6: Monitoring indicators	75
Targets in the National Protected Landscapes Targets and Outcomes Framework (PLTOF).....	75
Monitoring Indicators	78
Indicators from the 2023 – 2025 Management Plan which have been removed.....	84
Appendix 7: Pathway to net zero overview.	86
Appendix 8: Priority habitats and species.....	87
Appendix 9: Why biodiversity is an important consideration in the Cotswolds National Landscape	88
Appendix 10: Major development	93

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 seek 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 over-arching 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: We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.

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 – The water environment. Watercourses and bodies of water within the Cotswolds National Landscape have good ecological and chemical status.

Outcome 10 – Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.

Outcome 11 – Development and transport: Development and transport schemes positively contribute to the purpose of national 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. The Levelling Up and Regeneration Act 2023 places a duty on relevant authorities to seek to further the statutory purposes of protected landscapes².

² More details can be found in appendix 4.

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

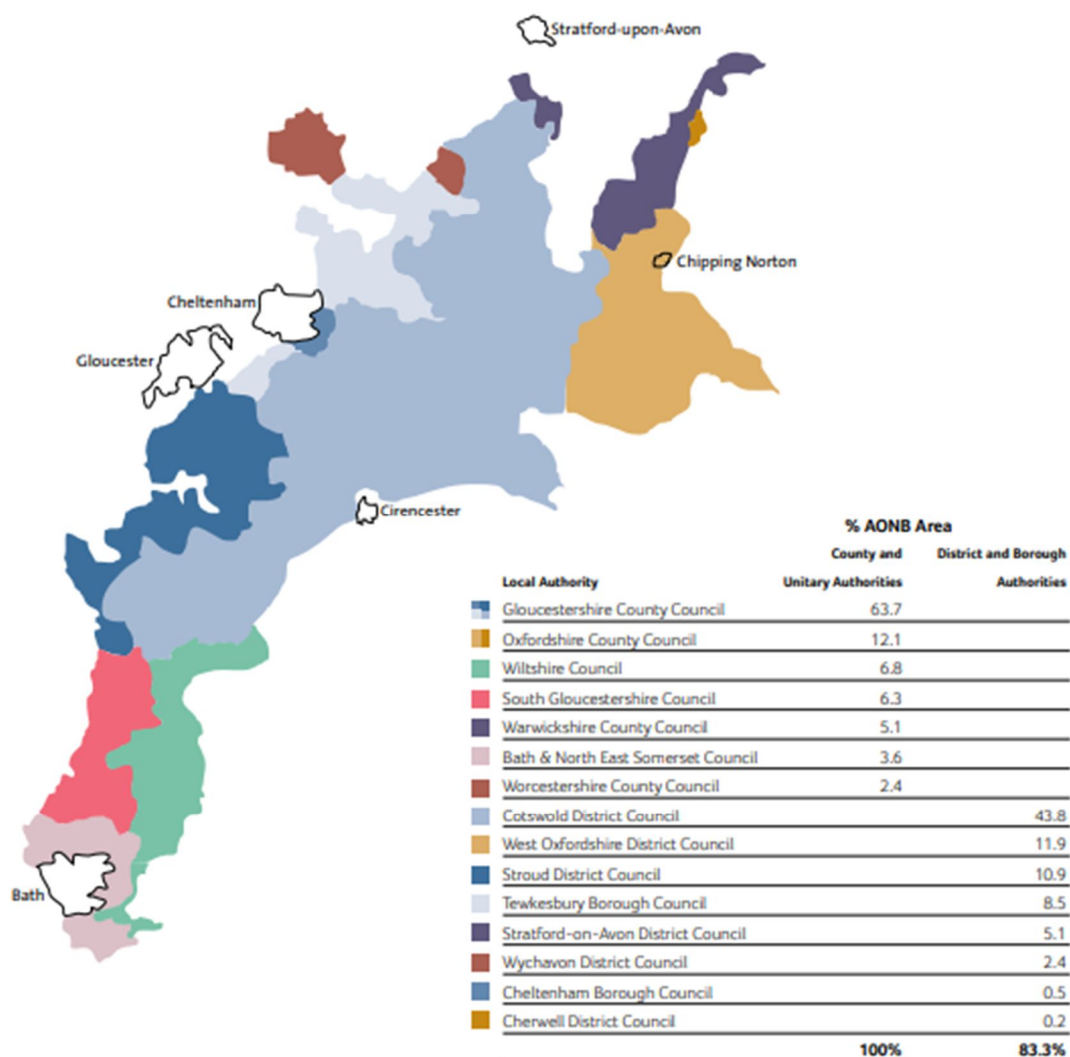
1. Introduction

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.

Local Authority Boundaries



National landscapes are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them³. The statutory purpose of AONB designation is to conserve and enhance their natural beauty⁴.

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 purposes⁵:

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 CNL⁶.

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 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 plan⁷, which sets out policies for the management of the CNL⁸. 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.

³ 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.

⁴ Section 82, Countryside and Rights of Way Act (2000).

⁵ Section 87, Countryside and Rights of Way Act (2000), as amended by the Natural Environment and Rural Communities (NERC) Act (2006).

⁶ 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.

⁷ Section 89 (1), Countryside and Rights of Way Act (2000) as amended by the NERC Act (2006).

⁸ Section 89, Countryside and Rights of Way Act (2000) as amended by the NERC Act (2006).

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 CNL. This legal requirement is known as the 'seek to further' duty⁹. This duty applies to relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in the CNL. Helping to deliver the outcomes, policies and targets of the Management Plan is an important component of fulfilling this duty.

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

⁹ Section 245 of the [Levelling Up and Regeneration Act 2023](#) introduced a new duty on relevant authorities in relation to management plans. For national landscapes, this is enacted through Section 90A of the Countryside and Rights of Way Act 2000, which states that:

The Secretary of State may by regulations make provision:

- (a) requiring a relevant authority ... to contribute to the preparation, implementation or review of a plan under section 89 relating to an area of outstanding natural beauty in England;
- (b) setting out how such a relevant authority may or must do so.

These regulations are likely to be developed, consulted on and come into force during the lifetime of this Management Plan.

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 'seek to further' duty (see Appendix 4).

Appendix 6 shows the key targets and monitoring indicators 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 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.

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 are complimentary and inter-related. They 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. Each outcome is followed by a brief statement describing the primary relevant drivers for change. 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

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.

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 CNL, 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 same principle applies to parish or town councils in relation to the review and development of neighbourhood 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 to further the statutory purposes of a protected landscape ... *'should align with and help to deliver the aims and objectives of the designated landscape's statutory management plan'*.¹¹ In the context of planning, this principle should be applied in relation to plan-making and decision-taking. *(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.¹² 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.
- **'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.

¹¹ In the context of the Cotswolds National Landscape Management Plan, 'aims and objectives' equates to outcomes and policies.

¹² [Section 245 of the Levelling Up and Regeneration Act 2023](#).

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.

The impact of these key issues on the natural beauty of the CNL were considered during the development of the vision and the outcomes. They can be summarised as follows:

Key Issue 1 - The climate emergency

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

Climate change is an important driver of environmental change in the CNL, and the symptoms of a changing climate are already being felt. The UK Met Office's Climate Projections Headline Findings report (2022)¹³ 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. These changes present a significant threat to the natural beauty and special qualities of the CNL. However, there is still a window of opportunity where the CNL can play a vital role in mitigating its worst impacts, whilst building a resilient landscape for future generations.

The Landscapes Review¹⁴ emphasised the importance of the role National Landscapes should play in mitigating and adapting to climate change, and the CNL is committed to ambitious climate action.

In November 2021 the CNL Board adopted a [Climate Crisis Commitment](#) in which it 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)."

In line with the commitment that all national landscapes have made in the [Colchester Declaration](#)¹⁵, this scenario will include clear, measurable targets to achieve net zero.

National Landscapes are also now required to embed climate adaptation plans within future Management Plans¹⁶, and will be expected to contribute to climate change targets in the [Protected Landscapes Targets and Outcomes Framework](#) (PLTOF).

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. This strategy has been followed up with the investment in a consumption-based carbon assessment and a pathway to net zero. These resources demonstrate the CNL's commitment to ambitious climate action and provide the framework for achieving net zero by 2050, or sooner.

¹³ Met Office (2022). [UK Climate Projections: Headline Findings](#), version 4.

¹⁴ Defra (2019) [Landscapes Review Final Report](#)

¹⁵ A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019

¹⁶ [Third National Adaptation Programme \(NAP3\)](#) Annex 1: Climate risks and opportunities

Land use and management will be central to delivering this. Farming needs to adapt to focus on improving soil health to continue producing food, whilst reducing soil loss, sequestering carbon, protect water resources and providing better water quality and flood management; and tree cover needs to increase to capture carbon and provide shade and cooling. Wildflower grassland also helps to sequester carbon¹⁷. Other areas such as energy and transport, and food and drink will also need to be addressed, with much more of our energy needs met through low carbon energy technologies, buildings becoming more energy efficient and greater resilience built into our infrastructure; and community food networks being created to link farmers, businesses and consumers.

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 and fragmentation 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 Review¹⁸ 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](#)¹⁹ which contains commitments to produce nature recovery plans and restore habitats and populations of endangered species.

¹⁷ <https://www.plantlife.org.uk/wp-content/uploads/2023/08/Grasslands-as-a-Carbon-Store.pdf>

¹⁸ Defra (2019) [Landscapes Review Final Report](#)

¹⁹ A commitment to tackle the climate emergency and ecological crisis signed by all AONBs at a national conference in Colchester in 2019.

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.

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 (hopefully they will be by this plans publication or at least we will have a good idea of their content) 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.

Wider societal changes continue to affect people living and working in the Cotswolds. These include worsening housing affordability, pressure on the agricultural sector and moves towards more hybrid and remote working.

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.

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, geomorphological²⁰¹⁶ 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;
- 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;

²⁰ 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 Olimpicks, cheese rolling, [Levellers day](#) and woolsack races²¹.

5. Cross cutting themes

Tackling 21st century issues through progressive partnerships

The climate emergency

Outcome 1 – Climate action:

Climate action: We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.

The scale and urgency of climate action are very significant, and the CNL is not exempt from playing a full part. Indeed, analysis shows that emissions per person in the CNL are over 25% higher than the UK average. All the necessary actions need to be designed in ways which conserve and enhance the natural beauty of the Cotswolds for future generations, and carefully but urgently implemented.

Policy CC1: Climate change – mitigation

- CC1.1. 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. Examples include:
- Increase canopy cover through increased tree cover and woodland and hedgerow creation.
 - Measures that capture and store carbon in soil such as using herb-rich leys, minimising cultivation and wildflower grassland restoration.
 - Extensive grazing and integrating extensive livestock systems with arable production.
- CC1.2. Greenhouse gas emissions should be minimised through reducing energy demand in existing and new buildings and infrastructure by:
- Improving energy efficiency, for example, by retrofitting existing buildings. Where traditional buildings including listed buildings are retrofitted and this effects the fabric of the building, 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 the use of sustainably sourced timber and secondary and recycled materials within all construction unless demonstrably unachievable on technical and practical grounds;
 - Utilising passive measures, for example the orientation of buildings, passive house design and the provision of high levels of insulation;

²¹ A fuller list of heritage and cultural associations is in the [Conserving and Celebrating Cultural Capital in the Cotswolds National Landscape](#) position statement.

- Additional glazing, solar panels, heating systems (e.g. air or water source heat pumps) and low carbon driveway materials should be considered.
- Sustainable construction methods and management plans to reduce and manage construction waste should be implemented²²;
- Incentivising voluntary sustainability standards, for example BREEAM, Building with Nature, and One Planet Living principles.

CC1.3. Greenhouse gas emissions should be minimised through reducing emissions from both residents' and tourists' transport and travel by:

- 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; a comprehensive bus service linked to public transport hub promotion/integration and information.
- Prioritise the provision of walking, cycling and public transport use, including adequate cycle parking and safe cycle routes.
- Providing sufficient infrastructure for the charging of electric vehicles, scooters and bikes;
- Promoting messages aimed at minimising air travel by Cotswolds residents.
- Developers should be encouraged to evidence how their development will support active travel and public transportation use. This includes incorporation of cycle storage, workplace lockers, changing, dry room and shower facilities to encourage staff active travel, car club provisions, EV charging points that go above and beyond the current Building Regulations.

CC1.4. Greenhouse gas emissions should be minimised through generating and distributing energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation, this plan and associated guidance including the CNL [Renewable Energy Position Statement](#) (June 2023):

- All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources.
- Support community-led renewable energy production, in line with the CNL [Renewable Energy Position Statement](#).

CC1.5 Greenhouse gas emissions from food production should be minimised by supporting the development of community food networks, linking farmers and businesses to each other and consumers; promote the purchasing locally produced food products and services and encouraging small-scale vegetable growing in gardens and allotments.

CC1.6. Climate action should be undertaken in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.

CC1.7. Stakeholders should work towards the delivery of the relevant targets for climate change within the national Protected Landscapes 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).

²² This is backed up by CONFOR's '[The National Wood Strategy](#)' and the '[Timber in Construction Roadmap](#)'

Target 7 has been excluded as it concerns the area of peat restored. Target 8 is currently being apportioned across protected landscapes nationally and will additionally be further informed by local woodland opportunity mapping. The local target is likely to exceed the apportioned national target.

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 Plan. (references added in final version)
- [the CNL Climate Change Strategy \(2022\)](#)
- The CNL Climate Change Adaptation Plan (to be published by XXXX)

CC2.2. Climate change adaptation should be a significant driver in the design of all new development, infrastructure and transport provision²³.

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.

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.

To do this, the CNL has invested in a [consumption-based carbon assessment](#), to understand the extent and sources of current emissions in the landscape, whilst setting out a rough scenario to reach Net Zero. A series of workshops with stakeholders ran throughout the winter of 2023. [The resulting report published in February 2024 set these findings in the context of the CNL](#). These investments provide a clear framework for setting out these policies for the CNL to reach Net Zero by 2050, or sooner (Appendix 7).

Land use and management changes should be a priority area for reducing emissions and sequestering carbon, but any changes must seek to further and be compatible with the conservation and enhancement of the natural beauty of the CNL. This can be achieved through a range of actions, including:

- Creating a woodland, tree and hedgerow opportunity map in consideration of the core purposes of CNL and using this map to guide increased appropriate woodland and hedgerow

²³ 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.

creation. The potential for different tree species to be more resilient to climate change should be taken into consideration when choosing which species to plant²⁴.

- Quantify current emissions from farming and the potential contribution of regenerative agriculture to emissions reductions and climate mitigation. Use this to accelerate the uptake of regenerative agriculture practices in CNL.

This Management Plan covers 20% of the remaining harvests before 2050. Accordingly, actions cannot be delayed, and so further analysis, opportunity mapping etc. must happen alongside encouraging changes now in land use and management.

It is a cornerstone principle of resilience preparation that we plan for a wide range of possible future changes and the CNLs climate adaptation plan should identify the level of risk posed to each of the landscape's special qualities and provisioning services, whilst identifying the stakeholders/partners CNL will need to work with to address them.

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.

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

²⁴ Details are in the Cotswolds National Landscape [Tree Species and Provenance Position Statement](#).

encouraged to value and celebrate being part of a nationally recognised landscape and to contribute to the purpose of national 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.

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

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 relevant authorities, including public bodies, to continue working collaboratively 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.

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 government policies for farming, consumer demand for cheap food and global commodity markets supported by technological advances in agriculture.

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 delivered in a way that is 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, woodland creation and management and hedgelaying – should be supported to ensure the long-term retention, creation and management of the key features of the Cotswolds National Landscape.

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.

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 be delivered in a way that is compatible with and 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.

The Cotswolds represents the best-known section of the oolitic limestone band that arcs across England from Dorset to the Humber. The distinctive character of the Cotswolds and its special qualities are defined by this underlying limestone geology. It provides a unifying character with a visible presence in the landscape and use as a building material. The importance of geology in the CNL is illustrated by the designation of 36 geological Sites of Special Scientific Interest and over 85 Regionally Important Geological and Geomorphological Sites.

Policy CE3: Natural and cultural capital – principles

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. 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.

- 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.

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.

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.

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.

Policy CE4: Local distinctiveness

- CE4.1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape (CNL) should be delivered in a way that is 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 published by the Board.
 - being designed 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.

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 as this varies across the Cotswolds and stone sourced from too far away will be intrusive and undermine local distinctiveness.

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.

The elements that contribute to local distinctiveness are described in detail within the report [Local Distinctiveness and Landscape Change](#). They also include building walls, roofing and features.

Tranquillity

Outcome 5 – Tranquillity:

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

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 2007²⁵.

Policy CE5: Tranquillity

- CE5.1. Proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.
- CE5.2. Measures should be taken to remove and where removal is not possible, minimise existing sources of noise 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.²⁶

Although the CNL has a relatively 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,

²⁵ CPRE (2007). [Developing an Intrusion Map of England](#)

²⁶ Cotswolds National Landscape Board (2019). [Tranquillity Position Statement](#).

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 CE6 addresses light pollution, Policy CE5 has an emphasis on noise. This incorporates issues such as significant increases in traffic in the towns, villages, smaller settlements and across the wider countryside of the CNL, including increased traffic arising from developments outside of the CNL.²⁷ Increased use of electric vehicles will not help reduce traffic noise as most vehicle noise, when moving, is generated by tyres and air noise.

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 lighting at night.

The CNL has relatively dark, nighttime skies compared to other parts of England that are not in national landscapes, with these dark skies being one of the CNL's special qualities. For example, Cotswold District, which covers 44% of the CNL, ranks 13th for the quality of its dark skies out of all the districts, boroughs and unitary authorities in England. However, light pollution from surrounding urban areas and from market towns within the CNL does significantly and increasingly affect the dark skies of the CNL in those locations. '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. With ever-increasing levels of new housing (and other lit development) in the CNL, light pollution is likely to get worse unless action is taken to address this issue.

Policy CE6: Dark skies

- CE6.1. Proposals that are likely to impact on the dark skies of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.
- CE6.2. Measures should be taken to increase the area of dark skies in the CNL by removing and, where removal is not possible or appropriate, reducing existing sources of lighting.
- CE6.3. Proposals that are likely to impact on the dark skies or dark landscapes of the CNL should have regard to and be compatible with:

²⁷ The Board's [Tranquillity Position Statement](#) identifies that, as a 'rule of thumb', if a proposed development would increase traffic movements (and / or HGV movements) on roads within and / or along the boundary of the CNL by 10% or more, this should be considered a significant increase.

- 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.²⁸

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.

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 three 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. This guidance will include a description of dark landscapes which will be used here too.

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.

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.

²⁸ Cotswolds National Landscape Board (2019). [Tranquillity Position Statement](#).

Policy CE7: Historic environment and cultural heritage

- CE7.1. Proposals that are likely to impact on the historic environment and cultural heritage of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and 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-designated²⁹, 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.
- CE7.8. Stakeholders should work towards the delivery of the relevant targets for heritage assets within the national Protected Landscapes 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.

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

²⁹ '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.

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 ratified the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage in March 2024.

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 assets³⁰ 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.

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 Character³¹. 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.

However, the historic environment can also act as the inspiration or catalyst for positive change through creative and sympathetic design. The NPPF (paragraph 196) states that plans should take into account “opportunities to draw on the contribution made by the historic environment to the character of a place “

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

³⁰ A heritage asset is defined in the National Planning Policy Framework as: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

³¹ More information on Historic Landscape Characterisation is available on the [Historic England Website](#)

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.

The internationally important habitats and species found across the Cotswolds have been declining significantly for decades. This greatly diminished wildlife now faces additional challenges resulting from climate change. We are now at a turning point where thanks to new funding mechanisms we can achieve the recovery of nature, just before it is too late.

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 8. The relevant LNRSs are:

- i. Gloucestershire [Add Link when final version published](#)
- ii. Oxfordshire [Add Link when final version published](#)
- 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 CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan and position statements. 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 CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan. 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 is 28,079 hectares of a range of wildlife-rich habitats outside protected sites by 2042 (from a 2022 baseline). **Interim target based on Nature Recovery Plan.**
- 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 2030.
- Target 8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

Target 8 is currently being apportioned across protected landscapes nationally and will additionally be further informed by local woodland opportunity mapping. The local target is likely to exceed the apportioned national target.

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 8.

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)³²;
- 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 proposed Defra consultation.

CE8.7. Development near the habitats listed in appendix 8 should secure significant gains in the form of enhancing existing habitat condition, buffering the habitat and improving greater connectivity between similar habitats.

CE8.8. Measures to conserve and restore biodiversity including the outcomes, priorities,

³² Note this includes ancient semi-natural woodland, ancient wood pasture and parkland, and plantations on ancient woodland sites (PAWS) Natural England and the Forestry Commission have published joint [Standing Advice for Ancient Woodland and Ancient and Veteran Trees](#), (updated in January 2022). This Standing Advice can be a material consideration for planning decisions.

targets and measures within the Cotswolds Nature Recovery Plan 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 and fragmentation 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](#)³³ 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 9.

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 Management Plan and Nature Recovery Plan.

Supporting LNRS delivery is one of the ways that public authorities including the CNL Board can demonstrate their compliance with the biodiversity duty³⁴ that the Environment Act 2021 introduced. Under this duty they “*must consider what they can do to conserve and enhance biodiversity in England.*”

LNRS’s should be compatible with the CNL Management Plan and guidance (including the Cotswolds Nature Recovery Plan.) This is one of the ways that the accountable bodies responsible for them can demonstrate compliance with their duty to seek to further the statutory purposes of protected landscapes³⁵.

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

³³ Adopted by the Cotswolds National Landscape Board.

³⁴ <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty>

³⁵ [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](#)

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 expected to be 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 and Local Nature Recovery Strategies.

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 9.

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.

New development can have an impact on habitats by increasing access and the erosion, disturbance and litter that comes with it. This impact can be mitigated, for example Stroud District Council have a 'roof tax' to help fund the management of Rodborough Common to offset the impacts of increasing use

The priority habitats and species list in Appendix 8 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 8 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

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 CE8 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 The water environment

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

None of the rivers in the Cotswold’s achieve good chemical status and only 11.7% of their length achieve good ecological status³⁶. Most of the WFD failures are linked to fish, macrophytes and Phosphate. The water quality of the CNL’s rivers is affected by pollution from:

- Wastewater and sewage
- Diffuse rural pollution from agriculture
- Diffuse pollution from towns, villages and roads

Water management needs to address a range of issues including quality, supply and flow in an integrated manner.

Policy CE9: Water

- CE9.1. Water resources should be 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 and domestic water use targets, and water conservation measures, for example rainwater harvesting and/or water recycling and grey water systems.
- CE9.3. New development that links to the sewerage system should not be commenced until the sewerage infrastructure (including the relevant sewage treatment works) has sufficient capacity to cope with the additional load, including future loads resulting from changing rainfall patterns.
- CE9.4. Sewage pollution from storm overflows and continuous outfalls should be minimised and be at least within legal and regulatory requirements.

³⁶ Protected Landscapes Targets and Outcomes Framework 2024 data release.

- CE9.5. Phosphorus treatment should be provided at all sewage treatment works to achieve good Water Framework Directive (WFD) status for Phosphate.
- CE9.6. Planning conditions such as the provision of appropriate manure storage facilities for farming and/or equestrian sites, including disposal frequency and method etc. can be explored to help mitigate run off and subsequent water contamination. Similar conditions can be imposed to septic tanks and cess pits, to prevent degradation and overflow and subsequent contamination.
- CE9.7. Practical measures to improve water quality and quantity should be implemented including:
- I. The restoration of 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 including habitat creation.
 - 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.
- CE9.8. For proposals on sites incorporating or located adjacent to watercourses, opportunities should be sought through careful design and landscaping to re-naturalise the water courses where possible, including restoration of the bankside and instream habitats and leaving an undeveloped buffer zone of at least 10 metres width

The proportion of pollutants from wastewater and sewage, agriculture, and towns villages and roads varies across and within the different river catchments. For example, within the Evenlode 85% of Phosphate is derived from the water industry and the rest from mainly agriculture and a small percentage from urban sources. Consequently, the phosphate status for the whole of the River Evenlode is poor. **Comparison with another river to follow.**

A significant issue caused by a combination of new development and lack of investment in waste water treatment is sewage treatment works operating beyond their designed capacity. The issue is exacerbated by ground and surface water ingress compounded by warmer and wetter winters caused by climate change. The result is storm overflow discharges releasing untreated sewage into the rivers.

There are also big issues around urban creep from new developments leading to less permeable surfaces and more surface water running into the sewers. Reduction in storm overflows is complex, but sustainable urban drainage has a part to play to reduce overflows.

Storm overflows may run for a few hours or days but phosphorous from sewage treatment works, even during normal operation, is a constant. The technically achievable limit of Phosphorous removal at sewage treatment works is 0.25 mg/litre and whilst a good target to aim for may not be required at all sites to achieve good status. Typically, good status for a waterbody is between 0.05 mg/l – 0.075 mg/l depending on waterbody characteristics such as altitude and alkalinity.

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.

Diffuse pollution from towns, villages and roads comes from run-off, commerce e.g. car washes, drainage misconnections e.g. domestic appliances connected to the surface water network and inappropriate disposal of domestic materials.

Sewage and diffuse pollution contain nutrients, chemicals including heavy metals, pathogens, microplastics and sediment resulting in eutrophication, loss of biodiversity, risks to human health, increased cost of water treatment and harm to tourism and recreation.

Redevelopment of sites incorporating/ adjacent to a watercourse present the valuable opportunity for ecological betterment. Through considered design and landscaping, opportunities should be sought to re-naturalise the watercourse, restore the bankside and instream habitats, leave an undeveloped buffer zone of at least 10 metres width and update and improve the site's surface water drainage infrastructure. In some cases, this may require reinstatement of the buffer zone on previously developed land. Upgraded drainage infrastructure should look to use natural strategies such as ecological swales and reedbeds to improve the quality of water discharged into the watercourse.

The water in the CNL is mainly from deep in the limestone aquifers. The Cotswolds is home to a large aquifer which supplies water to homes and businesses both inside and outside the Cotswolds National Landscape (CNL). There are 14 groundwater bodies in the CNL. 50% are rated good and 50% as poor. The main sources of groundwater pollution are pesticides, herbicides and nitrates from agriculture. As a consequence, most of the CNL is designated as a Drinking Water Safeguard Zone and a Nitrate Vulnerable Zone. It could, however, take decades for the pollutants to work through the aquifer.

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 and drought, 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 and the water system as a whole, needs to become more resilient to climate change. Good quality and diverse riverine habitats are essential for improving resilience to drought.

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.

The CNL is a distinct geographical and geological area important for its water in terms of supply, quality, landscape, natural beauty, biodiversity and economy. The CNL is, however, divided across 7 catchments, 4 water companies (4 of which supply water and 3 treat waste water) and three Environment Agency regions making managing water across the CNL complex. River Basin Management Plans (RBMPs) describe the framework used to protect and improve the quality of waters in each river basin district. They are the strategic plans for water in England and include information on the current condition of waterbodies, reasons why they are not in good condition, objectives, and measures to achieve these. They are updated every 6 years with the next update in 2027. This plan and supporting guidance, particularly the [The Cotswolds Nature Recovery Plan](#) support measures within RBMPs and similarly the delivery of RBMPs should reflect this plan's policies and associated guidance.

Consideration should be given to developing an integrated water plan for the CNL with a primary goal of thriving plants and wildlife enhancing the beauty, heritage and engagement with the natural environment. This would be underpinned by goals such as improving environmental quality, using nature's resources sustainably and improving climate change mitigation.

Farming and land management

Outcome 10 – Farming and land management:

Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.

The CNL is a farmed landscape, its landscape is largely a product of farming and will continue to be so. 87% of land in the CNL is agricultural land, 49% of which is arable and 43% grassland³⁷. 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). In addition to these major and long-established economic drivers, farming and land management decisions are increasingly influenced by a far more diverse set of societal needs, such as carbon storage, nature recovery, clean energy and public access.

Policy CE10: Farming and land management

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

CE10.2. Farming and land management in the CNL and in the setting of the CNL should be compatible with and seek to further the CNL Management Plan. It should also be compatible with and seek to further guidance produced by the CNL Board, including the:

- i. CNL – Landscape Strategy and Guidelines

³⁷ Cotswolds National Landscape Board (2015). [Farming, Forestry and the Equestrian Sector in the Cotswolds AONB, Update](#) A new study can provide more up to date figures

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

CE10.3. Woodland creation and tree planting proposals (including natural colonisation) should be compatible with seek to further the conservation and enhancement of the natural beauty of the CNL in accordance with guidance produced by the CNL Board. In particular they should:

- i. Work with the landscape character of their setting and compliment the open views that people enjoy from viewpoints, roads and public rights of way.
- ii. Be located where they best meet the objectives of the nature recovery network, improving the connectivity of woodland habitats whilst avoiding damaging other habitats and their potential to be better connected.
- iii. Be located in accordance with the CNL canopy cover opportunity mapping.

CE10.4. Farmers and land managers should have access to clear and consistent sources of advice, guidance and support, including fair access to markets and payments for environmental services.

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

Farming and land management in the UK is undergoing a period of significant change and disruption, largely driven by changes to policy that have altered the way farmers can access public funding to support their businesses. This has involved a shift from an approach largely based on subsidising the cost of agricultural activities, to one that pays farmers for environmental goods and services (or ‘public goods’). Managing this transition and maintaining a viable farm business can be very challenging.

In addition to the policy context, farmers are under increasing pressure to respond to many other factors that are influencing the way they use and manage land. For example, the climate crisis requires farmers to not only identify how they can reach net zero within their farm businesses and supply chains, but additionally find ways of sequestering and storing carbon in the landscape for the rest of society. They also have to achieve this without compromising food security by taking too much land out of production or failing to develop farming systems that are climate resilient. Additionally farming also 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. These combined challenges are complex and we need to seek ways of decision-making that achieves holistically optimal outcomes.

The continued development of more sustainable and regenerative farming practices, which may span conventional and organic systems, has an important role to play in delivering multiple social and environmental objectives whilst simultaneously producing food. A focus on improving landscape function can help inform any approach and lead to more holistically optimal outcomes. Landscape function considers underpinning resources and process such as:

- The mineral/nutrient cycle
Actions to minimise the use of artificial inputs and improve the natural fertility of agricultural soils, increasing the nutritional value of food produced from them.
- The water cycle

Actions to increase soil infiltration rates, slowing the flow of water through farmed and managed land, improving drought resilience and reducing diffuse pollution.

- Energy flow
Actions to increase the amount of solar energy being captured by plants and trees (including crops), sequestering more atmospheric carbon and driving food chains for people and wildlife.
- Biodiversity/community dynamics
Actions to increase the diversity and abundance of plants and wildlife on farmland, supporting greater natural resilience to pests, disease and other environmental stresses.

Farm businesses need to be economically viable and resilient to deliver everything we are asking of them. This requires continued public and private investment that is accessible and effective, as well as fair access to markets. For example, the success of publicly funded schemes, such as ELM and the Farming Investment Fund, supported by advice and guidance, is essential. Similarly, the rollout of privately funded green finance schemes needs to be effective in delivery both environmental outcomes and supporting farm businesses and livelihoods.

Wider societal changes are impacting on farming and land management. An ageing farm population and the rapid development of new technology both increases the risks of a loss of skills and land fragmentation and offers opportunities for the wider adoption of sustainable, regenerative and nature recovery practices.

Bringing woodlands back into management is a priority and can be more important than planting new woodlands. Actively managing woodland in a sustainable way helps the woodland become more resilient to climate change and disease, benefits biodiversity and supports the rural economy. Lack of management is due to many factors, but especially the lack of appropriate markets for woodland products. Ash dieback has prompted many woodland owners to bring woodland back into management but 38% of woodland, 10,158ha, in the CNL is still classed as unmanaged. Bringing ancient woodland back into management is particularly important for biodiversity and 9,218ha of ancient woodland (35% of the total woodland) is still classed as unmanaged.

To contribute to climate change mitigation and adaptation the Government's target is to increase tree cover in England from 14.5% in 2023 to 16.5% by 2050. The CNL's canopy cover is around 18% but there is capacity to increase canopy cover through woodland creation and planting trees outside of woods. The latter includes wood pasture, hedgerows and hedgerow trees, in-field trees, agroforestry and trees in towns and villages, particularly in new development.

Woodland creation and tree 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. In some instances, tree planting that is implemented to mitigate the visual impact of new development can also adversely affect landscape character. Planting design and use of open ground can help but it may not be appropriate for a particular site to be planted because of the value of the existing habitat, potential to create and link other priority habitats or landscape character.

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 colonisation should be looked for in concert with opportunities for planting to assist this process.

'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.

In woodlands used for timber production, ecologically sound forestry practices such as continuous cover management regimes should be applied. These create a diverse woodland structure and bring a multitude of environmental benefits to the woodland whilst producing a sustainable timber source. Understanding of the local supply chain, and enhance connections between woodland owners/managers and timber markets should be increased.

Woodland creation and tree planting, including restocking after felling and loss through ash dieback, should seek to retain the character of existing Cotswold woodlands and treescapes outside of woodlands whilst considering species diversity, genetic diversity (provenance and origin) and mitigation of climate change and pests and diseases

The CNL Board has commissioned an opportunity map to guide the creation of new canopy cover. **If completed before the management Plan is published add link.**

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, nutrient neutrality 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 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, particularly timber. 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.

Policy CE11: Problem species³⁸, 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.

³⁸ These species are not addressed in the Biodiversity section as they are not species that we are aiming to conserve and enhance (see Appendix 8).

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 and landscape scale coordination along with and a coordinated approach to managing grey squirrels.

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 continue to have an increasing impact on woodland and trees in the landscape during the life of the Management Plan.

Invasive non-native species pose a serious risk to ecosystems, outcompeting native species, disrupting ecological processes and transforming habitats.

There are a number of invasive non-native species present in the CNL that are having a harmful impact, particularly on biodiversity. These include the American Signal Crayfish, 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. Ash dieback is a recent example.

Any activity (i.e., Development) that facilitates or fails to adequately mitigate the introduction and spread of invasive non-native species, can cause detrimental impacts on native biodiversity and the ecosystem functionality.

Under the Wildlife and Countryside Act 1981 (as amended), it is a legal offense to introduce or encourage the proliferation of any species listed as invasive under schedule 9. Similarly, species classified as 'controlled waste' under the Environmental Protection Act 1990 must be handled in accordance with legal regulations. These species must be safely disposed of at a licensed landfill site to prevent further proliferation and environmental harm.

Control measures including check, clean, dry should be integral throughout all plans/ method statements of any formal work within or that interacts with the natural landscape (i.e., included but not limited to check clean dry).

Up to date, representative data of invasive populations is essential. The recording of invasive species activity/ presence (i.e., via citizen science) is a key strategy to inform management strategies.

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.

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 soils³⁹. 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 purpose of national landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.

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.

Policy CE13: Development and transport – principles

CE13.1. Development and transport proposals in the Cotswolds National Landscape (CNL) and its setting should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the natural beauty of the CNL including its special qualities. 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
- (vi) CNL Pathway to Net-Zero

CE13.2. Development and transport proposals in the CNL should be delivered in a way that is compatible with and 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 national landscapes.

CE13.4. The purposes of conserving and enhancing the natural beauty of the CNL and

³⁹ Cotswolds National Landscape Board (2022). [Climate Change Strategy](#)

increasing the understanding and enjoyment of the CNL special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport 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.⁴⁰

This landscape-led approach is particularly important for major development⁴¹.

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.

Other important policies which have a significant bearing on development and transport are CC1 Climate Change Mitigation and CC2 Climate Change Adaptation.

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.

⁴⁰ 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.

⁴¹ 'Major development', in this context, equates to the definition provided in Footnote 64 of the [NPPF](#). See also Policy CE11.

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.

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.⁴²

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'⁴³. 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.⁴⁴

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).

The transport recommendations within Policy CC1 and the CNL [Pathway to Net Zero](#) should also be pursued.

Further information on what is meant by a landscape-led approach to development is provided in the Board's 'Landscape-led Development Position Statement'.⁴⁵ 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

⁴² Cotswolds National Landscape Board (2017) [Development in the Setting of the Cotswolds AONB](#)

⁴³ 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).

⁴⁴ Cotswolds National Landscape Board (2019) [Tranquillity Position Statement](#) (see Section 4.5).

⁴⁵ Cotswolds National Landscape Board (2021) [Landscape-led Development Position Statement and appendices](#).

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.⁴⁶

CE14.2. Relevant stakeholders should fully assess relevant site allocations and development 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.⁴⁷

CE14.3. Local authorities and other relevant stakeholders should explicitly state whether they consider relevant allocations and development proposals to be major development⁴⁸.

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';⁴⁹
- 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.⁵⁰

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.⁵¹

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.

⁴⁶ Paragraph 183 of the [NPPF](#)

⁴⁷ Cotswolds National Landscape Board (2021) [Landscape-led Development Position Statement](#) and [appendices](#).

⁴⁸ 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 \(Admin\)](#)).

⁴⁹ [R \(Advearse\) v Dorset Council v Hallam Land Management Ltd \[2020\] EWHC 807](#). Direct quote from paragraph 35

⁵⁰ [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...'

⁵¹ [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...'

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 \(Development Management Procedure\) \(England\) Order 2015](#) (or ‘DMP’ for short), which relates specifically to: minerals and waste development; housing developments of 10 or more dwellings or on sites having an area of 0.5 hectares or more; the provision of buildings where the floor space to be created is 1,000 square metres or more; or development on a site having an area of one hectare or more. However, the DMP definition is still a relevant consideration in relation to footnote 60 of the NPPF. There may be circumstances where a development that is larger than the DMP thresholds would not constitute major development in the context of paragraph 183 of the NPPF. Equally, there may also be circumstances where a development that is smaller than the DMP threshold would constitute major development in the context of paragraph 183 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 183] 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’⁵². 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 2015⁵³ and 2017⁵⁴ 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.

⁵² 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).

⁵³ South Downs National Park Authority (2015) [South Downs Local Plan Preferred Options: Assessment of Site Allocations Against Major Development Considerations – Technical Report](#).

⁵⁴ South Downs National Park Authority (2017) [South Downs Local Plan Pre-Submission: Assessment of Site Allocations Against Major Development Considerations – Technical Report](#).

Further guidance regarding major development is provided in Appendix 10 of the Management Plan and in Section 7.3, Appendix 3 and Appendix 5 of the Board’s Landscape-led Development Position Statement.⁵⁵

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.⁵⁶

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 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.⁵⁷

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 need⁵⁸ and does not present a target for housing provision.⁵⁹
- 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.⁶⁰ 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.⁶¹
- (d) The CNL is unlikely to be a suitable area for accommodating unmet needs from

⁵⁵ Cotswolds National Landscape Board (2021) Landscape-led Development Position Statement and appendices.

⁵⁶ Sections 5.4 and 5.5 of the [Board’s Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

⁵⁷ Sections 5.4 and 5.5 of the Board’s Housing Position Statement and appendices provide additional context on this issue.

⁵⁸ UK Government (2020) [Guidance on Housing and economic needs assessment](#). Paragraph 001.

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”](#).

⁶⁰ 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](#).

⁶¹ [Government Guidance on the Natural Environment](#). Paragraph 041

adjoining, non-designated areas.⁶² 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.⁶³
- (f) The scale and extent of development in the CNL should be limited.⁶⁴

CE15.5. Consideration should be given to whether the constraints relating to the national landscape designation merit 'exceptional circumstances' which may justify using an alternative approach to the standard method for assessing housing need.⁶⁵

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:⁶⁶

- 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.

Housing in the Cotswolds is amongst the most unaffordable in the country. Some types of "affordable housing" as defined by national planning policy are unaffordable in real terms to people that have a local connection to the Cotswolds.

⁶² See previous footnote. Section 5.3 of the [Board's Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

⁶³ 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*'.

⁶⁴ Ministry of Housing, Communities and Local Government (2023) [National Planning Policy Framework \(NPPF\)](#). Paragraph 182.

⁶⁵ 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.

⁶⁶ Sections 5.6 and 5.10 of the [Board's Housing Position Statement](#) and [appendices](#) provide additional context on this issue.

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’*.⁶⁷ 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.⁶⁸ As such, it is logical to apply the same principles, outlined above for national parks, in national landscapes as well.

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’*.⁶⁹ 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 / “standard method” 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’*.⁷⁰

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’*.⁷¹

There is concern that high levels of second home ownership, retirement homes and buy to let have removed housing from the market that could otherwise be made available to people who need a home within the Cotswolds that they can afford to buy or rent. This results in increased demand

⁶⁷ Defra (2010). [English National Parks and the Broads – UK Government Vision and Circular 2010](#), Paragraphs 78 and 79.

⁶⁸ Ministry of Housing, Communities and Local Government (2023) [National Planning Policy Framework](#). Paragraph 182.

⁶⁹ Government Guidance on the Natural Environment. Paragraph 041.

⁷⁰ Planning Inspectorate (2018) [Report on the Examination of the West Oxfordshire Local Plan 2031](#). Paragraph 219.

⁷¹ West Oxfordshire District Council (2018). [West Oxfordshire Local Plan 2031](#).

within a reduced pool of housing stock, which inflates house prices and makes housing less affordable. The Board is particularly concerned that that younger people, families, key workers, those who care for the landscape of the CNL and others who form part of the Cotswold communities are able to live within the Cotswolds. This is vital for sustaining community services such as schools and reducing long distance commuting from locations where housing is more affordable.

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.⁷²

Policy CE16: Waste management and the circular economy

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.

⁷² Cotswolds National Landscape Board (2021). [Housing Position Statement](#) and [appendices](#).

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.

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.

Policy UE1: Health and wellbeing

- UE1.1. Further 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 Cotswolds Outdoor Learning Network has drawn together Partner organisations to share best practice and funding opportunities within the Cotswold and will be a great source for creating further learning opportunities with schools and community groups going forward. The new natural History GCSE will also help to further understanding of the natural environment and facilitate more involvement from the education sector and encourage future citizen scientists and connection to the Cotswolds and its wildlife.

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. Volunteer groups often struggle to attract those from underrepresented communities due to perceived and real-life barriers and so more support is needed for organisations to encourage and enable a more diverse range of volunteers to participate. 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.

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.

Policy UE2: Access and recreation

- UE2.1. A safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way network that welcomes people of all abilities should be maintained, enhanced and promoted across the Cotswolds National Landscape (CNL) and into surrounding communities.
- UE2.2. Improvements to access and recreation provision including rights of way should be undertaken in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of CNL. Innovative ways of providing named routes without introducing additional signage should be explored. This should be balanced with the needs of groups that lack confidence in exploring the countryside, sensitive sites and of landowners and farmers who need to keep people on designated routes.
- UE2.3. Open Access Land and other land including Country Parks, that is open to public access⁷³ 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.

⁷³ 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.

- 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 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 be delivered in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the CNL. Where recreational use is having or is likely to have, an adverse impact on the natural beauty of the National Landscape or on the integrity of existing wildlife and historic 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 there is a conflict between (i) conservation and enhancement of natural beauty and (ii) public enjoyment of this natural beauty in the CNL, the conservation and enhancement of natural beauty should be given greater weight.
- UE2.14. Stakeholders should work towards the delivery of the relevant target for access and recreation within the national Protected Landscapes 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.

The use of the term “everyone” within the wording of this outcome is deliberate and is intended to promote equity, 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

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 underrepresented communities to promote the extensive self-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 Landscapes Association and adopted by the Cotswolds National Landscape Board in 2021 will support this work.

A current lack of long-term and increasing 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 the new National Trails Charity (NTUK) will be key to the long term sustainability of these internationally recognized flagship Trails.

New Agri- environment schemes have the potential to create additional access to the Cotswolds and improve existing routes and should be encouraged.

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 avoid, 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 and Scheduled Monuments.

The prioritisation of 'conserving and enhancing natural beauty' 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.⁷⁴

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.

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, conserved and enhanced. The

⁷⁴ Section 87, Countryside and Rights of Way Act (2000).

tourism sector should, therefore, contribute to the conservation and enhancement of this natural beauty.

Policy UE3: Sustainable tourism

- UE3.1. Tourism within the Cotswolds National Landscape (CNL) should be delivered and managed in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of CNL and should minimise the emission of greenhouse gases in accordance with policy CC1.
- 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 CNL 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 to 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 initiatives developed to help facilitate the car free visitor experience.

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.

Visitors' emissions, including travelling to/from the Cotswolds, are equivalent to about half of total residents' emissions. Their emissions overwhelmingly come from travelling to/from the Cotswolds, rather than what they do, buy and eat while they are here. In particular, emissions from travelling are dominated by flying (48%) and road fuel (41%). Of the remaining 11%, while visitors are here, about half their emissions are due to food and drink.⁷⁵

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.

⁷⁵ Cotswolds National Landscape (2023). [Creating a Pathway to a Climate-Friendly Cotswolds. A Layman's Guide to Small World Consulting's Carbon Baseline Assessment Technical Report.](#)

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.

Following the 2021 “*de Bois Review: an independent review of Destination Management Organisations in England*” and the government response, VisitEngland is currently creating a portfolio of nationally supported and strategic ‘Local Visitor Economy Partnerships’ (LVEPs). These LVEPs will provide strong local leadership and governance in tourism destination all over the country. In 2023 the Cotswolds Plus Local Visitor Economy Partnership was accredited by VisitEngland, and now provides strategic advice and direction to the following destination marketing organisations: Cotswolds Tourism (lead partner), Forest of Dean and Wye Valley Tourism, Marketing Cheltenham, Visit Gloucester, Visit Gloucestershire. The Cotswolds Plus LVEP has a Management Board made up of strategic partners including Gloucestershire County Council and local authority representatives from the geographic area of the LVEP and is independently chaired by a representative of the Cotswolds National Landscape Board. The main themes of work are: Sustainability (transport and active travel); Sustainability (business practices and biodiversity); Accessibility and Inclusion; Skills and Training; Research and Data; Business Support; Travel Trade; and Meetings, Incentives, Conferences and Exhibitions (MICE).

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 name of the designation, the Board of the Cotswolds Conservation Board decided in June 2020 to use the name National Landscape (NL) for the area designated as an AONB and the name Cotswolds National Landscape Board for the Cotswolds Conservation Board. All AONBs now use the name National Landscape.

This plan uses the term National Landscape for the designated area and National Landscape Board for the organisation.

AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them⁷⁶. They have the same landscape status as national parks.

The statutory purpose of AONB designation is to conserve and enhance their natural beauty⁷⁷. 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 businesses⁷⁸.

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.

AONBs 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. As such, they are an international designation as well as a national-level designation. They are managed mainly for landscape protection and recreation.

⁷⁶ 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*.

⁷⁷ Section 82, Countryside and Rights of Way Act 2000

⁷⁸ 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 national landscapes (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 it⁷⁹. It is widely accepted that natural beauty is, in part, due to human intervention, such as agriculture⁸⁰.

Natural England has developed a list of natural beauty criteria⁸¹ 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 legislation⁸². 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 same⁸³.

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 beauty⁸⁴

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.

Natural heritage features

⁷⁹ Countryside Agency (2001) *Areas of Outstanding Natural Beauty Management Plans*. A guide. Countryside Agency Publications. West Yorkshire

⁸⁰ Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England](#).

⁸¹ 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).

⁸² Natural England (2011) [Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England](#).

⁸³ See Lords Hansard 20 Mar 2006 (Col 51) and Commons Hansard 13 June 2000 (Col 556W).

⁸⁴ 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](#).

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 Order⁸⁵ 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 purposes⁸⁶:

- 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 Landscape⁸⁷.

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 Landscape⁸⁸.

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

⁸⁵ The Cotswolds Area of Outstanding Natural Beauty (Establishment of Conservation Board) Order 2004.

⁸⁶ Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

⁸⁷ 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*'.

⁸⁸ 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.

- **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's recovery and describes the measures that can achieve it.
- **[Position Statements](#)**: The Board issues a number of Position Statements, which expand on specific policies in the Management Plan and on related issues. 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](#)**⁸⁹⁸⁴: 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.

⁸⁹ 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 2023⁹⁰ places a duty on relevant authorities⁹¹ to seek to further the statutory purposes of protected landscapes⁹² (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.*⁹³

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 landscape designations.

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.*⁹⁴

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.⁹⁵

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.*⁹⁶

The ‘seek to further’ duty is, therefore, clearly intended to ensure that the natural beauty of protected landscapes (including national landscapes) will be enhanced (i.e. left in a better state) 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 on these provisions or on

⁹⁰ Section 245 of the Levelling Up and Regeneration Act 2023 ([link](#)).

⁹¹ ‘Relevant authority’, in this context, includes any Minister of the Crown, public body, statutory undertaker or person holding public office.

⁹² ‘Protected landscapes’ means national parks, the Broads and national landscapes.

⁹³ Section 85 of the Countryside and Rights of Way Act 2000 ([link](#)).

⁹⁴ UK Parliament (2023) *Levelling Up and Regeneration Bill – Explanatory Notes on Lords Amendments*. Updated version, 12 October 2023. ([Link](#)). Page 35.

⁹⁵ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 6.

⁹⁶ <https://www.gov.uk/government/news/new-laws-to-speed-up-planning-build-homes-and-level-up>

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.⁹⁷

At the present time, the two most useful reference points relating to the ‘seek to further’ duty are the advice produced by Natural England⁹⁸ and the legal opinion obtained by Campaign for National Parks (CNP)⁹⁹.

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:¹⁰⁰

- (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.*

⁹⁷ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 2a.

⁹⁸ 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).

⁹⁹ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)).

¹⁰⁰ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 17.

- (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.*
- (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 of 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:¹⁰¹

- 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:¹⁰²

- *[Relevant authorities] would be well-advised not 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*

¹⁰¹ Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 19.

¹⁰² Landmark Chambers (2024) *Re: section 245 of the Levelling Up and Regeneration Act 2023*. Instructed by the Campaign for National Parks. ([Link](#)). Paragraph 21.

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 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’ ¹⁰³	Seek to further the conservation and enhancement of the natural beauty of the Cotswolds National Landscape (CNL). In doing so, have regard to and align with the CNL 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.	CC3, CE1, CE3, CE8, CE10
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework where relevant.	
Department for the Environment, Food and Rural Affairs (Defra)	Publish and promote guidance on the ‘seek to further’ duty.	CC6, CE10
	Develop secondary legislation on how relevant authorities should comply with the ‘seek to further’ duty.	CC6, CE1, CE8, CE10
	Develop secondary legislation on how relevant authorities should contribute to the production and implementation of protected landscape management plans and the delivery of the targets within the Protected Landscape Targets and Outcomes Framework.	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 and the delivery of the targets within the Protected Landscape Targets and Outcomes Framework, in particular targets 2,3,4,5,8 &9.	CE8
Ministry of Housing, Communities & Local Government	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

¹⁰³ 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.

Natural England	Support the establishment and delivery of Environmental Land Management and rural development support mechanisms specifically for the Cotswolds National Landscape.	CE8
	Provide funding for National Trails through three-year rolling funding streams, and provide cohesive national co-ordination	CE7
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework, in particular targets 2, 3, 4, & 10	
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
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework, in particular targets 2, 3, 4, 5, 6, & 8.	
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
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework, in particular targets 1, 2, 3, 4, & 5.	
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 contributing to the delivery of target 10 within the Protected Landscapes Targets and Outcomes Framework.	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 (Gloucestershire LEP roles and responsibilities transferred to Gloucestershire County Council from April 2024).	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	CE10

	National Landscape designation will be achieved in the Local Plan area.	
	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
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework where relevant.	
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
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework where relevant.	
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
	Contribute to the delivery of targets within the Protected Landscapes Targets and Outcomes Framework, particularly target 10.	
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
	Support the delivery of targets within the Protected Landscapes Targets and Outcomes Framework where relevant.	
Tourism organisations	Support the development of and contribute to the Caring for the Cotswolds visitor giving scheme.	UE3

and tourism providers	Support a coordinated approach to tourism across the whole of the Cotswolds.	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' ¹⁰⁴ .	CE11

¹⁰⁴ See Policy CE10.6, paragraph 2, for more details on what 'landscape-led' means in this context.

Appendix 6: Monitoring indicators

Targets in the National Protected Landscapes Targets and Outcomes Framework (PLTOF).

These are the indicators for the national targets set by Defra within the protected landscapes targets and outcomes framework. Three of them, wildlife rich habitats restored or created, peat and canopy cover are currently being apportioned across all protected landscapes through a national process.

Abbreviations;

PLTOF – Protected Landscapes Targets and Outcomes Framework

NLs – National Landscapes

NPs – National Parks

PLs – Protected Landscapes

TI – Target Indicator

Management Plan Outcomes and Policies	National PLTOF Target	Target indicator	Cotswolds baseline figure from the 2024 data release	Cotswolds Target 2030	Cotswolds Target 2050	Notes	Statistic Code
1. Climate action CC1: Climate change – mitigation	7. Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050.	Extent of peat under restoration in Protected Landscapes	0 Ha	0 Ha	0 Ha		TI_07
	6. Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels.	Level of greenhouse gas emissions within Protected Landscapes	1,090.32 kt CO2e			2022. Data each year from 2005 (1740.2 a reduction of 649.88) is available. See https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022 . Overall emissions are given as a single figure, measured in kilotons of carbon dioxide equivalent (KtCO2e), by weighting non-carbon dioxide gases by their global warming potential (GWP).	TI_06

1. Climate action CC1: Climate change – mitigation 8. Biodiversity and nature recovery CE8: Nature recovery and biodiversity	8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).	Extent of tree canopy and woodland cover in Protected Landscapes	35,903 Ha			Indicator is in development. Interim statistics provided for woodland cover & tree canopy. Woodland based on national forest inventory = 2,6105 ha + Trees Outside woods based on trees outside woods and orchards maps. 9,798 ha. The target is currently being apportioned across protected landscapes nationally and will additionally be further informed by local woodland opportunity mapping. The local target is likely to exceed the apportioned national target.	TI_08
2. Working together CC4: Working in partnership	9.Improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme.	Policies in place to ensure Protected Landscapes are taking positive action to widen the diversity of their staff, boards and volunteers	1	1	1	Equalities and Diversity Policy published December 2020. Note. Unlike the other targets, this target is not repeated under the relevant policy within the main body of the plan. This is because it relates to the CNL Board alone and not the CNL as a place.	TI_09i
7. Historic environment and cultural heritage CE7: Historic environment and cultural heritage	10. Decrease the number of nationally designated heritage assets at risk in Protected Landscapes.	Number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk	62	tba	tba	Historic England are being consulted on this target.	TI_10
	10. Decrease the number of nationally designated heritage assets at risk in Protected Landscapes.	Number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk	0.56%	tba	tba	Historic England are being consulted on this target.	TI_10
8. Biodiversity and nature recovery CE8: Nature recovery and biodiversity	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).	Extent of wildlife rich habitat created or restored within Protected Landscapes, outside of protected sites	Not available CNRP (2021) 41,471 Ha	17,331 Ha	33,684 Ha	Indicator is in development. Interim targets based on Cotswolds Nature Recovery Plan targets less hedgerows. Habitat definitions may vary from the indicator when completed. 2042 target is 28,079 Ha arrived at by adding 2/5 of the difference between 2040 & 2045 targets to 2040. Baseline is the Cotswolds Nature Recovery Plan existing habitat figures less hedgerows.	TI_01
	2. Bring 80% of SSSIs within Protected Landscapes into favourable condition by 2042	Percentage of SSSIs within Protected Landscapes in favourable condition	49%	59%	84%	Percentage of SSSI features in favourable condition. NLS 41.3%, NPs 34.8%, PLs 38.6%, England 39.5%.	TI_02

						Interim 2030 & 2050 targets estimated by calculating the average annual increase to meet the 2042 target assuming a steady rate (1.72%pa) & projecting that forward. Natural England are being consulted on this target.	
	3. For 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.	Percentage of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition	14.4%	83.0%	100%	"Negative" refers to actions which have not been yet undertaken or which are resulting in a negative impact on the SSSI. NLs 15.3%, NPs 10.8%, PLs 13.4%, England 14.1%. A feature can only be considered to have an 'action on track' if it has an up-to-date condition assessment. Many do not and so do not count as having 'actions on track'. When the assessments are updated, if they are still favourable, they will then count as having 'actions on track'. Interim 2030 target estimated by calculating the average annual increase to meet the 2028 target & (11.3%pa) & projecting it forward by 2 more years. Natural England are being consulted on this target.	TI_03
	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.	Extent of priority habitat within Protected Landscapes, outside of protected sites, in favourable management through agri-environment schemes	Not available			Indicator is in development.	TI_04
	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.	Percentage of land managers adopting nature-friendly farming on_ a percentage of their land	Not available			Indicator is in development.	TI_05
12. Health and wellbeing	9. Improve and promote accessibility to and engagement with Protected Landscapes for all	Number of visits and volunteer days facilitated by new equipment	Not available			Indicator is in development.	TI_09e

UE1: Health and wellbeing	using existing metrics in our Access for All programme.	Number of schools engaged (primary and secondary) both inside and outside the Protected Landscape boundary	Not available			Indicator is in development.	TI_09f
		Number of volunteer days	Not available			Indicator is in development.	TI_09g
13. Access and recreation UE2: Access and recreation	9. 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 % of total path	Not available			Indicator is in development.	TI_09a
		Number of accessible toilets and rest stops	Not available			Indicator is in development.	TI_09b
		Number of disability accessible parking spaces	Not available			Indicator is in development.	TI_09c
		Number of accessible gates and gaps	Not available			Indicator is in development.	TI_09d
		Number of accessible or easy access routes for which wayfinding has been created or improved	Not available			Indicator is in development.	TI_09h

Monitoring Indicators

There are an additional 24 data sets within the PLTOF and they are supplemented with additional local indicators. The PLTOF indicators have statistic codes starting with “Stat” and the supplementary indicators have codes starting with “Local”. The PLTOF indicators will be monitored nationally with data cut to their boundaries provided to the protected landscapes. The local indicators will be monitored locally.

Management Plan Outcomes	Management Plan Policies	Description of statistic	Cotswolds baseline figure from the 2024 data release	Notes	Statistic Code
1. Climate action	CC1 – Climate change mitigation	Area, depth and percentage cover of peatland within Protected Landscapes	24.45 Ha	Deep peaty soils (= 0%). NLS 6.18% PLs 9.01%	Stat_06

1. Climate action	CC1 – Climate change mitigation	Estimate of the amount of carbon stored and sequestered by habitats within Protected Landscapes	34,533,221 tonnes of carbon (t C)	Sum of the median estimate for 0-150cm soil depth and the median estimate for biomass.	Stat_07
1. Climate action	CC1 – Climate change mitigation	Total predicted output from new renewable energy schemes permitted in the Cotswolds National Landscape each year.	0	No records of solar or wind proposals permitted within recent years. This is the predicted output from planning applications which is frequently greater than the actual output.	Local_01
2. Working together	CC3 – Compliance with section 85 of the CRoW Act	% of planning decisions that are made in line with CNL Board recommendations (where the Board has objected).	56%	When a local authority (or planning inspector) has reached a decision that is contrary to our recommendation it doesn't necessarily mean that they have failed to comply with the 'seek to further duty'.	Local_02
2. Working together	CC3 – Compliance with section 85 of the CRoW Act	% of decisions (for development management proposals that we have commented on) that explicitly refer to the S85 'seek to further' duty.	Available end Dec 2024	The 'seek to further' duty was only introduced at the end of Q3 in 2023/24 so we don't have a baseline figure for the whole of 2023/24.	Local_03
2. Working together	CC3 – Compliance with section 85 of the CRoW Act	% of decisions (for development management proposals that we have commented on) that, in CNL opinion, adequately address the S85 'seek to further' duty.	Available end Dec 2024	The 'seek to further' duty was only introduced at the end of Q3 in 2023/24 so we don't have a baseline figure for the whole of 2023/24.	Local_04
3. Landscape	CE1 – Landscape	National Character Areas which contain Protected Landscape(s), where changes to landscape and waterscape character is assessed as improving/no change/declining	Not available		Stat_10
3. Landscape 8. Nature recovery and biodiversity	CE1 – Landscape CE8 – Nature recovery and biodiversity	Length of hedgerows and other traditional field boundaries (drystone walls) within Protected Landscapes	13100 km	Initial figures are for the length of hedgerow. Figures will be added for the length of dry-stone walls and shared in April 2025. Quite a lot of drystone walls are already included in the hedgerow data as the methodology could not differentiate walls with scrub or trees alongside them.	Stat_11
3. Landscape	CE2 – Geology	Number of geological and geomorphological SSSI unit features and percentage in favourable or recovering condition	40		Stat_15

3. Landscape	CE2 – Geology	Number of geological and geomorphological SSSI unit features and percentage in favourable or recovering condition	58%		Stat_15
5. Tranquillity	CE5 – Tranquillity	% of National Landscape recorded as ‘most tranquil’	5.9% most tranquil.	0.96% of England is most tranquil. This is the most tranquil decile. Top 3 deciles is 31.88% for the Cotswolds compared to 8.6% for England. Data from 2006	Local_05
6. Dark skies	CE6 – Dark skies	% of National Landscape affected by light pollution	26.9%	Affected by light pollution defined as >0.25 NanoWatts/cm2/sr. Data CPRE 2016	Local_07
7. Historic environment and cultural heritage	Policy CE7	Number of nationally designated heritage assets in Protected Landscapes	11,112		Stat_09
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Extent of priority habitat and other habitats within Protected Landscapes	23,655 Ha	Statistics on ‘other habitats’ available in April 2025,	Stat_01
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Extent of priority habitat and other habitats within Protected Landscapes	13%	Statistics on ‘other habitats’ available in April 2025,	Stat_01
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Area of land within Protected Landscapes designated at international, national and local level for nature conservation	6,080.43 Ha	Excludes Local Wildlife Sites	Stat_02
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Area of land within Protected Landscapes designated at international, national and local level for nature conservation	3%	Excludes Local Wildlife Sites	Stat_02
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Area of woodland within Protected Landscapes under sustainable management	16,142 Ha		Stat_03
10. Farming and land management	CE10 - Farming and land management				
8. Nature recovery and biodiversity	CE8 – Nature recovery and biodiversity	Extent of ancient woodland within Protected Landscapes	9,353.1 Ha	Includes PAWS	Stat_04
9. Water	CE9 – Water	Ecological status of watercourses and water bodies within Protected Landscapes	11.7%	% Length of rivers, canals & surface water transfers in good ecological status (no high in Cotswolds). NLS 17.26%, PLS 23.27%	Stat_05
9. Water	CE9 – Water	Ecological status of watercourses and water bodies within Protected Landscapes	0%	% lakes in good ecological status (no high in the Cotswolds). NLS 1.02%, PLS 11.20%	Stat_05

9. Water	CE9 – Water	Ecological status of watercourses and water bodies within Protected Landscapes	50%	% Groundwater bodies in good ecological status. NLS 20.35%, PL's 23.27%.	Stat_05
9. Water	CE9 – Water	Ecological status of watercourses and water bodies within Protected Landscapes	12.61%	% Waterbody catchments in good ecological status (no high). NLS 14.83, PLs 23.68	Stat_05
10. Rural land management	CE10 - Farming and land management	Total area of land managed under agri-environment schemes and total value of schemes within Protected Landscapes	68,500 Ha	Countryside Stewardship (CS), Environmental Stewardship and the Sustainable Farming Incentive (SFI) . Also includes the value of CS and SFI 2022 agreements	Stat_12
10. Rural land management	CE10 - Farming and land management	Total area of land managed under agri-environment schemes and total value of schemes within Protected Landscapes	£3,537,600	Value of CS and SFI 2022 agreements	Stat_12
10. Rural land management	CE10 - Farming and land management	Area of land under different agricultural land uses within Protected Landscapes and number of livestock	Not available	Not in data release	Stat_13
10. Rural land management	CE10 - Farming and land management	Area and distribution of main landcover types within Protected landscapes	Not available	Not in data release	Stat_14
10. Rural land management	CE10 - Farming and land management	Extent of agricultural businesses within Protected Landscapes (number and size of holdings, number of agricultural workers)	Not available	Not in data release	Stat_16
11. Development and transport	CE13 – Development and transport principles	Number of adopted Local Plans with policy-level reference to the Cotswolds National Landscape Management Plan.	10	Out of the 15 local planning authorities that overlap with the CNL (76%)	Local_08
11. Development and transport	CE14 – Major development	Number of development proposals (that CNL have commented on), which have been permitted, that the Board considers to be major development	3	In the context of paragraph 183 of the NPPF. 2023/24	Local_09
11. Development and transport	CE15: Development priorities and evidence of need	Population estimates for Protected Landscapes	169,600		Stat_17
11. Development and transport	CE15: Development priorities and evidence of need	Average age of the population living in Protected Landscapes	46		Stat_18

11. Development and transport	CE15: Development priorities and evidence of need	Proportion of the population within each ethnic group in Protected Landscapes	1%	Asian, Asian British, or Asian Welsh. All NLS 1%, All PLs 1%, England 10%	Stat_19
11. Development and transport	CE15: Development priorities and evidence of need	Proportion of the population within each ethnic group in Protected Landscapes	0%	Black, Black British, Black Welsh, Caribbean, or African. All NLS 0%, All PLs 0%, England 4%.	Stat_19
11. Development and transport	CE15: Development priorities and evidence of need	Proportion of the population within each ethnic group in Protected Landscapes	2%	Mixed / Multiple ethnic groups. All NLS 2%, All PLs 2%, England 3%.	Stat_19
11. Development and transport	CE15: Development priorities and evidence of need	Proportion of the population within each ethnic group in Protected Landscapes	97%	White. All NLS 96%, All PLs 96%, England 81%	Stat_19
11. Development and transport	CE15: Development priorities and evidence of need	Proportion of the population within each ethnic group in Protected Landscapes	0%	Other. All NLS 0%, All PLs 0%, England 2%	Stat_19
11. Development and transport	CE15: Development priorities and evidence of need	Median earnings in Protected Landscapes	£2,350 pcm	All NLS = £2,300, All PLs = £2,300. Rural England = £2,300, England = £2,350	Stat_20
11. Development and transport	CE15: Development priorities and evidence of need	House price affordability ratios in Protected Landscapes	11x	Ratio of mean house purchase price to mean gross annual household income. All NLS = 11, All PLs = 11, Rural England = 8, England = 8	Stat_21
11. Development and transport	CE15: Development priorities and evidence of need	Number of new housing units (i.e. dwellings) permitted through planning applications CNL has commented on.	16	2023/24	Local_10
11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	1,345	10+ employees. Cotswolds all sizes 12,855	Stat_22
11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	9,540	1-9 Employees. Cotswolds all sizes 12,855	Stat_22
11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	1,965	0 employees. Cotswolds all sizes 12,855	Stat_22

11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	10%	10+ employees. NLS 11%, PLs 11%, Rural England 9%, England 10%	Stat_22
11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	74%	1-9 Employees. NLS 73%, PLs 71%, Rural England 74%, England 80%	Stat_22
11. Development and transport	CE15: Development priorities and evidence of need	Registered businesses by size and type in Protected Landscapes	15%	0 employees. NLS 18%, PLs 18%, Rural England 17%, England 10%	Stat_22
11. Development and transport 12. Health and wellbeing	CE15: Development priorities and evidence of need	Proportion of the population living in each decile of deprivation in Protected Landscapes	Median decile = 8	NLS, PLs & rural England; 7. England 5.	Stat_23
11. Development and transport	CE15: Development priorities and evidence of need	Number of pupils on the school roll (against total capacity) in Protected Landscapes	86%	Proportion of school capacity reached	Stat_24
11. Development and transport	CE16 – Waste management and the circular economy	Number of landfill and strategic waste management sites permitted.	1	2023/24. Using a threshold of 50,000 tonnes per annum as a definition of 'strategic'	Local_11
13. Access and recreation	UE2: Access and recreation	Length of National Trails within Protected Landscapes	163.4 km		Stat_08

Indicators from the 2023 – 2025 Management Plan which have been removed

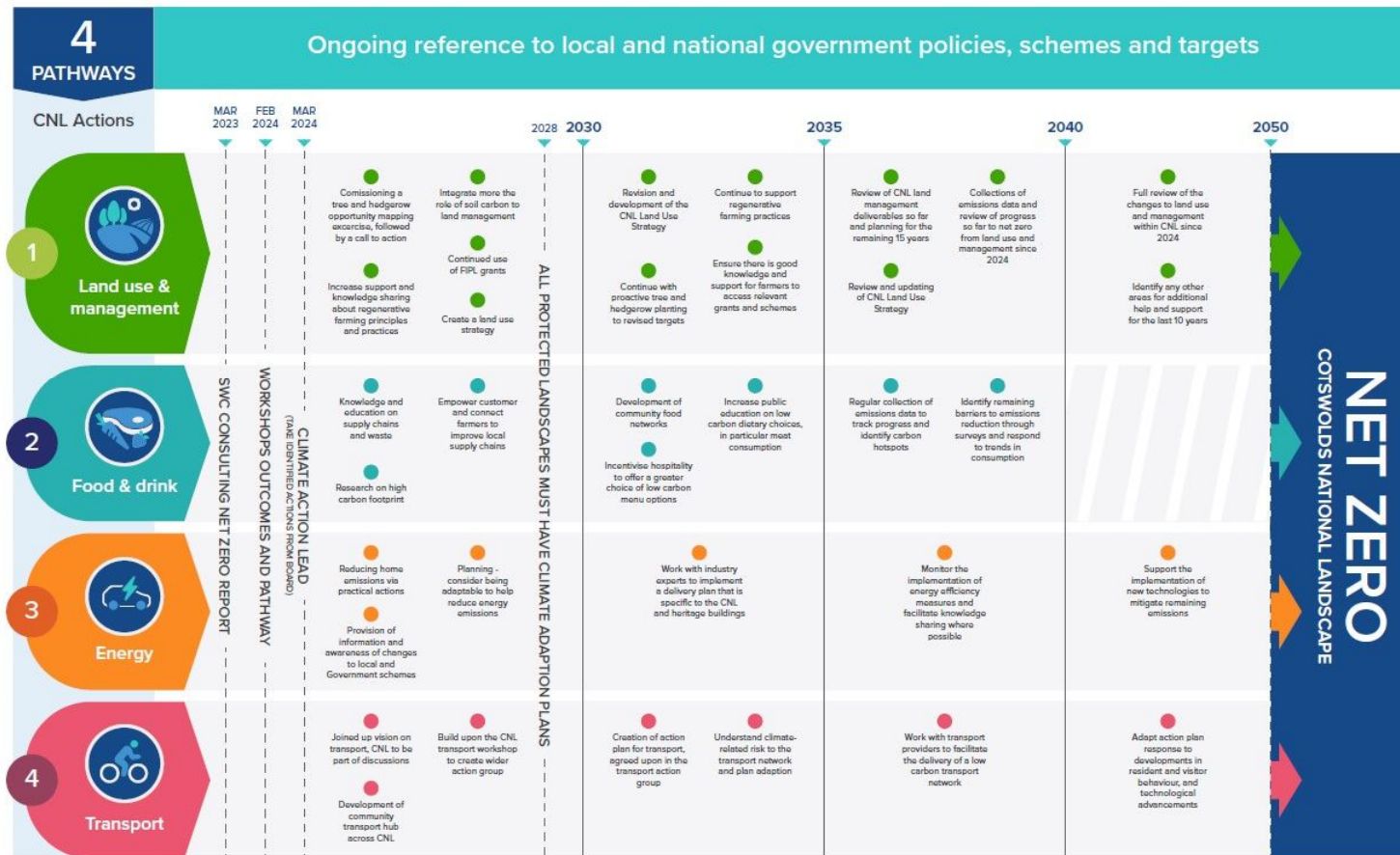
Note. This table is included in the consultation draft so people can see the change. It will be removed from the final draft. It does not include local indicators that have been removed due to repetition with PLTOF indicators.

Management Plan Outcomes	Management Plan Policies	Description of statistic	Reason for removal
Climate action (Outcome 1)	CC1 – Climate change mitigation	Adoption by partners of the National Landscape’s pathway to net zero emissions (or better) by 2050 (or sooner), including clear, measurable targets, and the delivery of the 2025-30 actions.	Many partners have their own targets e.g LAs are aiming for 2030. LAs will endorse the pathway via management plan endorsement
Climate action (Outcome 1)	CC2 – Climate change adaptation	Publication of a CNL climate change adaptation plan & tracking its delivery with partners.	This is a milestone not a monitoring indicator. Tracking delivery requires more definition to monitor. The adaptation plan will inform the 2030-35 management Plan.
Working together (Outcome 2)	Policy CC3 – Compliance with section 85 of the CRoW Act	% of planning decisions that demonstrably seek to further the purpose of National Landscape designation.	Not a very precise indicator, too subjective.
Working together (Outcome 2)	Policy CC4 – Working in Partnership	% of respondents ‘highly valuing’ the Cotswold National Landscape in residents & visitor surveys.	Not monitored
Landscape (Outcome 3)	Policy CE1 – Landscape	Changes to landscape character identified through fixed-point photography.	No baseline & new indicator (Stat 10) will replace
Landscape (Outcome 3)	Policy CE3 – Natural and cultural capital - principles	Extent to which the natural and cultural capital of the Cotswolds National Landscape has been assessed and evaluated.	vague
Local Distinctiveness (outcome 4)	CE4 – Local distinctiveness	Publication of development design guidance.	Milestone not an indicator. CNL design guidance not a priority. Quality not publication of LA design guidance is important

Historic environment and cultural heritage (Outcome 7)	Policy CE7 – Historic environment and cultural Heritage	Area of land under agri-environment/Environmental Land Management schemes for the management and protection of archaeological features.	No indication that it will be monitored under the PLTOF
Farming and land management (Outcome 10)	Policy CE10 – Farming and land management	Establishment of a Cotswolds- specific package of Environmental Land Management and rural support payments.	Not an indicator
Farming and land management (Outcome 10)	Policy CE11 – Problem species, pests and diseases	Extent of tree pests and diseases.	No indication that it will be monitored under the PLTOF
Farming and land management (Outcome 10)	Policy CE12 – Soils	Area of land under agri-environment/Environmental Land Management schemes for soil management.	No indication that it will be monitored under the PLTOF
Health and wellbeing (Outcome 12)	Policy UE1 – Health and wellbeing	Number of educational projects run by the Cotswold Voluntary Wardens.	Relates to the CNL body not the place.
Access and recreation (Outcome 13)	Policy UE2 – Access and recreation (see also Indicator 8):	Number of improvements made to the Public Rights of Way network by the Cotswold Voluntary Wardens.	Relates to the CNL body not the place.
Access and recreation (Outcome 13)	Policy UE2 – Access and recreation (see also Indicator 8):	Downloads of walking and exploring resources from the Cotswolds National Landscape Board website.	Relates to the CNL body not the place.
Sustainable tourism (Outcome 14)	Policy UE3 – Sustainable tourism	Number of businesses that are signed up to the Caring for the Cotswolds visitor giving scheme.	Relates to the CNL body not the place.
Sustainable tourism (Outcome 14)	Policy UE3 – Sustainable tourism	Income generated through the Caring for the Cotswolds visitor giving scheme.	Relates to the CNL body not the place.

Appendix 7: Pathway to net zero overview.

PATHWAY TO NET ZERO OVERVIEW



[Download the full report.](#)

Appendix 8: Priority habitats 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 9: 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.¹⁰⁵ 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.¹⁰⁶ Local authorities also have the statutory power to take action to accomplish this purpose.¹⁰⁷

Public authorities also have a statutory biodiversity duty¹⁰⁸ 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.¹⁰⁹ 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]*”.¹¹⁰

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.¹¹¹

A recent Wildlife and Countryside Link report on BNG refers to that KNP research.¹¹² It also states that Defra’s own research¹¹³ 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%.

¹⁰⁵ Section 82 of the [Countryside and Rights of Way \(CROW\) Act 2000](#).

¹⁰⁶ 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.

¹⁰⁷ Section 84 of the [CROW Act 2000](#).

¹⁰⁸ <https://www.gov.uk/guidance/complying-with-the-biodiversity-duty>

¹⁰⁹ 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.

¹¹⁰ Ministry of Housing, Communities and Local Government (2021) [National Planning Policy Framework](#). Paragraph 176, page 50.

¹¹¹ <https://cieem.net/kent-assesses-20-biodiversity-net-gain-requirement/>

¹¹² Wildlife and Countryside Link (2024) *Biodiversity Net Gain: more than a fancy offset?* ([link](#)).

¹¹³ 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.¹¹⁴

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 Report¹¹⁵ proposes that:

- national landscapes¹¹⁶ should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries;¹¹⁷
- national landscapes should have a renewed mission to recover and enhance nature;¹¹⁸
- 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.¹¹⁹

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.¹²⁰
- Our vision for protected landscapes is a coherent national network of... nature-rich spaces... Protected landscapes will drive forward nature recovery.¹²¹
 - The Prime Minister has committed to protect 30% of UK land for nature by 2030 (30 by 30)¹²²...Achieving 30 by 30 will rely on improvements in how these areas are protected and managed for nature recovery.¹²³
 - We will put our protected landscapes at the heart of delivering our nature recovery... policies.¹²⁴

¹¹⁴ 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>

¹¹⁵ Defra (2019) [Landscapes Review Final Report](#).

¹¹⁶ The phrase 'national landscapes' relates to AONBs and national parks.

¹¹⁷ Proposal 4, page 52.

¹¹⁸ Proposal 1, page 36.

¹¹⁹ Proposal 3, page 43.

¹²⁰ [Landscapes review: government response](#). Foreword.

¹²¹ Landscapes review: government response. Introduction.

¹²² <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'.

¹²³ [Landscapes review: government response](#). Since the publication of the review - nature and climate.

¹²⁴ [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.¹²⁵
- We will explore ways for protected landscapes to support responsible authorities in preparing [Local Nature Recovery Strategies].¹²⁶
- 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.¹²⁷
- 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.¹²⁸
- A core function of protected landscapes should be to drive nature recovery.¹²⁹

The Government report 'Delivering 30by30 on land in England'¹³⁰ 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.

¹²⁵ [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²⁶ [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²⁷ [Landscapes review: government response](#). The Nature Recovery Network and 30 by 30.

¹²⁸ [Landscapes review: government response](#). A stronger mission for nature recovery.

¹²⁹ [Landscapes review: government response](#). A stronger mission for nature recovery.

¹³⁰ 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:¹³¹

- **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).¹³²
- **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).

It is important to note that the Target 1 figure of 250,000 hectares is half of the Government's target of creating or restoring 500,000 hectares in England by 2042¹³³. So, protected landscapes are expected to deliver 50% of the national (England) target for habitat restoration / creation even though they only cover 25% of England. In other words, protected landscapes will be expected to restore / create three times as much wildlife-rich habitat, per unit area, as land outside protected landscapes.

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.

¹³¹ <https://www.gov.uk/government/publications/protected-landscapes-targets-and-outcomes-framework/protected-landscapes-targets-and-outcomes-framework>

¹³² 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.

¹³³ The Government's 25 Year Environment Plan, in 2018, introduced a target to create or restore 500,000ha of wildlife-rich habitat outside the protected landscapes network ([link](#) – page 26). This target was reiterated in the Government's Environmental Improvement Plan, in 2023, which specified that this target would be met by 2042 ([link](#) – page 31). This target became legally binding in the Environmental Targets (Biodiversity) (England) Regulations 2023 ([link](#)). This target is also reiterated in the Government's '30by30' policy paper ([link](#) – page 7).

- 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)¹³⁴ 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.

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.¹³⁵

In 2019, the CNL Board published the Cotswolds Nature Recovery Plan (CNRP)¹³⁶ 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 82,000ha¹³⁷ (40% of the CNL area), with the target being to achieve this by 2050. This is consistent with the current scientific evidence¹³⁸.

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.

¹³⁴ Chapter 4 provides a full list of the National Landscape’s special qualities.

¹³⁵ Cotswolds National Landscape. [Glorious Cotswold Grasslands](#).

¹³⁶ Cotswolds Conservation Board (2021). [Cotswolds Nature Recovery Plan](#).

¹³⁷ The figure rises to over 190,000ha if arable fields containing environmental measures are included.

¹³⁸ Defining and delivering resilient ecological networks: Nature Conservation in England. Isaac. N.J. et al 2017. *Journal of Applied Ecology*

Appendix 10: 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

Cotswolds National Landscape

New registered office address to be added here.

info@cotswoldsaonb.org.uk

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