

## Part B – Please use a separate sheet for each representation

Name or Organisation: **NATURAL ENGLAND**

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy	<b>Delivery Policy ES2 Renewable or low carbon energy generation (AONB aspects)</b>	Policies Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	✓	No	
4.(2) Sound	Yes		No	✓
4.(3) Complies with the Duty to co-operate	Yes	✓	No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Cotswolds Conservation Board has drawn to our attention the following matters relating to the policy's formulation in respect of the Cotswolds Area of Outstanding natural Beauty (AONB):

The assessment methodology and resulting 'suitable areas' mapping (Appx 8b) has not taken account of relevant Cotswolds AONB references e.g. Cotswolds AONB Management Plan (2018-23), AONB Landscape Character Assessment and AONB Landscape Strategy and Guidelines.

The landscape character assessment approach appears to omit consideration of impacts on visual amenity and cumulative impacts.

Differences exist in the Landscape Character Types in the AONB LCA and that used by the Council. Unless the resulting shortcomings are given further consideration there is a risk that sites for wind and solar energy developments would be likely to constitute 'major development' and not comply with para 172 of the NPPF.

Smaller scale size categorisation for both wind and solar energy proposals within the AONB or its setting is likely to be needed to tackle these issues.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A review of:

- (i) the landscape sensitivity mapping and associated assessments, specifically taking account of the Cotswold AONB reference documents described above and the relevant Landscape Character Types.
- (ii) The 'suitable areas' mapping to reflect the outcomes from (i).

(Continue on a separate sheet /expand box if necessary)

**Please note** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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N/a

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

