

Cotswold District Local Plan 2018 – 2031 Update

Town and Country Planning (Local Planning) Regulations 2012

Regulation 18 “Issues and Options” consultation/participation

Evidence Paper: Landscape

1. Introduction

- 1.1 Cotswold District has a highly valued landscape, recognised by a range of national and local designations. A high quality landscape does not only have aesthetic value but also plays a key role in health and wellbeing, the local economy, tackling the climate and ecological emergencies, as well as providing a clear sense of place to local communities and visitors. Much of Cotswold District is designated as an area of outstanding natural beauty (AONB).
- 1.2 There are often competing requirements in a changing landscape, such as accommodating future development (housing need, economic growth) whilst also seeking to protect and enhance the natural and built environment. This is an example of the “planning balance” that is characteristic of the system. It is important to keep Local Plan policies up to date to avoid tilting the balance in favour of approving an application and allow development to continue in circumstances where, if a sound Local Plan was in place, the balance may well have tipped the other way. Change in the landscape, including meeting the challenge of climate and ecological emergencies, may come from sources other than housing or commercial development: renewable energy installations, new farming practices, increased traffic, increased tourism and pollution.
- 1.3 Landscape planning policies can generally be seen in two ways;
 - as protecting and enhancing the existing landscape (the focus of this topic paper) and/or
 - as creating new high quality landscape (such as in Green Infrastructure, and design policies which are the subject of other topic papers in this series).
- 1.4 The Local Plan states, *‘it is vital that the character, visual quality and historic value of the landscape of the District is conserved and, where possible, enhanced’* (LP para. 10.4.2). In a district where a significant sector of its economy indirectly or directly relates to the quality of its landscape, this remains a central tenet of the Local Plan. Whilst being flexible enough to recognise and respond to the imperatives of the Climate Change and Biodiversity Emergencies, planning has an important role in ensuring the scale and location of development is contextually appropriate and strikes another balance between local and national (or international) concerns.
- 1.5 Viewing the landscape in the new context of the climate crisis requires us to acknowledge firstly that it is inevitable that the future landscape will be changed from the historic and

present landscape, and therefore, secondly, that the task of landscape conservation as it has been understood to date must now be reinterpreted.

- 1.6 The new challenge is to understand the speed with which these landscape changes will happen, and to shift focus from the preservation of those parts of its historic characteristics that cannot be saved, towards firstly the proactive contribution the landscape must make to tackling the climate crisis through mitigation, and secondly the actions required to adapt the landscape to be as resilient as possible to changing climatic conditions.

2. Objectives

- 2.1 The most relevant of the Local Plan strategic objectives is that relating to the historic and natural environment.
- 2.2 Possible amendments to the original objective, in part due to the climate change and ecological emergencies referred to above, are also suggested in red text.

1.Natural and Historic Environment

Through the use of appropriate planning policies in the development management process:

- a. Conserve and enhance the high quality, local distinctiveness and diversity of the natural and historic environment.
- a.b. Capitalise on the uplifted value of land resulting from planning permission and reinvest in natural capital, biodiversity improvements and nature based climate change solutions.
- b.c. Ensure that new development is of high quality and sustainable design, which reflects local character and distinctiveness, is appropriately sited, and provides attractive and inclusive environments.
- c.d. Protect the open countryside against sporadic development, while also avoiding coalescence of settlements, particularly around Cirencester.
- d.e. Support the creation of new green infrastructure to enhance environmental quality and provide health benefits.

3. NPPF, NPPG and other material considerations

- 3.1 **The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)** Para. 174 of the NPPF requires planning policies and decisions to protect and enhance valued landscapes, and recognise the intrinsic character and beauty of the countryside.
- 3.2 The importance of the AONB is also recognised. The NPPF accords *great weight* in planning decisions to the conservation of the landscape and scenic beauty together with their wildlife and cultural heritage (para. 176). Major development should be refused in the AONB except in exceptional circumstances and where it can be demonstrated it is in the public interest. 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 .
- 3.3 Para. 20 requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and planning measures to address climate change mitigation and adaptation.

- 3.4 Para. 130 states that planning policies and decisions should ensure developments are sympathetic to local character and history, including the landscape setting, while not preventing appropriate change or innovation.
- 3.5 Para. 133, which focuses on climate change, states ‘ *Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.*’ The NPPF encourages the use of renewable and low carbon energy. Policies should maximise renewable and low-carbon energy development, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.
- 3.6 The 2021 NPPF which came into force in July, where para. 176 has been amended in response to the **Glover Review of protected landscapes**, to clarify that the scale and extent of development within the settings of National Parks and AONBs should be sensitively located and designed so as to avoid adverse impacts on the designated landscapes. The inclusion of setting is a notable change, ‘The scale and extent of development within all these designated areas should be limited, *while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas*’..
- 3.7 **Planning Practice Guidance on natural environment** (landscape) states that to ensure conservation and enhancement of the countryside’s intrinsic character and beauty landscape character assessments should be prepared where appropriate and to complement Natural England’s **National Character Area** profiles. (NPPG, Paragraph: 036 Reference ID: 8-036-20190721, Paragraph: 037 Reference ID: 8-037-20190721)
- 3.8 In 2018 the **The Glover Review** was published which suggested a number of changes to the planning regime in respect of nationally protected landscapes, including AONBs, recognising their key role not only for their aesthetic landscape quality but also for health and well-being; nature recovery for example.

One proposal was the creation of additional national parks and the Cotswolds AONB was highlighted as a potential candidate. It is unlikely that this proposal will come into force during the life-time of the local plan. However, other protected landscapes legislation and guidance may change. In advance of these changes the Cotswolds Conservation Board have already changed their working title to the Cotswolds National Landscape. The Review and the forthcoming Environment Bill will need to be taken into account if the recommendations and targets are reflected in legislation and policy.

- 3.9 [The Environment Bill](#) was published in January 2020 and in November passed into law as [The Environment Act](#) 2021. It sets out new legal frameworks for air pollution, water quality and nature conservation and is seen as an opportunity to protect our environment and set a course for nature recovery in the UK. It is anticipated to include a new environmental watchdog (post-Brexit) and legally binding long-term environmental targets (such as for air quality, water, biodiversity) and a requirement for 15-year Environmental Improvement Plans (EIP), with [the 25-Year Environment Plan](#) to be the first such plan.
- 3.10 The Government’s 25-year environment plan and subsequent reform of our agricultural system brings together water, land and food into one overarching management framework

with climate resilient environments, infrastructure and places to live and work. This includes for example establishment of a *natural environment recovery network* across England, which will link existing protected sites and landscapes to green and blue infrastructure in towns and cities ([CIWEM](#)).

- 3.11 Landscape and GI are also key elements in the [National Design Guide](#) (see Design Topic Paper).
- 3.12 [Cotswolds AONB Management Plan 2018-2023](#) (Cotswold Conservation Board) - With some of the most sensitive landscapes in the country, AONBs are particularly vulnerable to change and the effects of development. Many of the key issues for the Cotswolds AONB are outlined in the Cotswolds Conservation Board's Management Plan which currently is being reviewed.
- 3.13 Key Issues include:
- Erosion of the natural beauty and special qualities of the Cotswolds AONB.
 - Lack of a consistent approach across the whole of the Cotswolds AONB.
 - Lack of understanding of the benefits of AONB designation.
- 3.14 Together with their recent position statements (accompanying guidance to the Management Plan and its policies) it advocates a landscape-led approach to development. Policies CC7 and CC8 however also relate to climate change mitigation and adaptation respectively. The Conservation Board have also produced a series of position statements on issues such as tranquillity and tree species and provenance and a landscape strategy and associated guidelines; all these help to inform decision making about the suitability of proposals within the protected landscape¹. Their [latest vision](#) includes useful reference to the challenge of how to approach climate change and ecological emergencies in a designated landscape.
- 3.15 [Climate change and ecological emergencies](#) In July 2019 the Council declared a climate change emergency followed by an Ecological Emergency (with associated action plan) a year later.
- 3.16 A **Climate Emergency Strategy** has been adopted and a **Renewable Energy Strategy** is in preparation that *'will take account of all opportunities and constraints [such as transmission capacity in the AONB], and propose ways to maximise renewable generation in the district, consistent with those constraints and with the declaration of a climate emergency'* (Climate Emergency Strategy para 13.3.2). There is also an Ecological Emergency Action Plan.
- 3.17 Following on from the declared emergencies The Council's [Corporate Strategy 2020-2024](#) aims to reduce its corporate net emissions by two-thirds by 2030 and to zero by 2045; 100% true zero carbon electricity use; and climate and ecological emergency considerations embedded in all decisions and policy. This includes partially reviewing the local plan to make it *'green to the core'*, based on a natural capital approach that includes identifying renewable

¹ The special qualities of AONBs highlights why they were designated. The retention/safeguarding of these qualities is considered to be of national interest

energy and storage opportunities and making climate change and nature recovery strategic priorities for all planning and new developments.

4. Background evidence and Sustainability Appraisal – setting out the issues

4.1 Landscape assessments have emphasised the high landscape and historic quality of the whole area and the need to ensure its protection and enhancement (LP 10.4.7).

4.2 The landscape of the District falls into 3 main landscape character descriptions, as indicated by its inclusion in 3 national character areas as shown in Table 1.

Table 1 - National Character Areas within Cotswold District

Character Area	Key Characteristics include
Severn and Avon Vales (106)	<ul style="list-style-type: none"> • Prominent oolitic limestone outliers of the Cotswold Hills break up the low-lying landscape in the south-east of the area • Woodland is sparsely distributed across this landscape but a well wooded impression is provided by frequent hedgerow trees, parkland and surviving traditional orchards • Pasture and stock rearing predominate on steeper slopes,
Cotswolds (107)	<ul style="list-style-type: none"> • Open and expansive scarp and high wold dipping gently to the southeast, dissected by river valleys • Arable farming dominates the high wold and dip slope while permanent pasture prevails on the steep slopes of the scarp and river valleys with pockets of internationally important limestone grassland • Drystone walls define the pattern of fields of the high wold and dip slope. On the deeper soils and river valleys, hedgerows form the main field boundaries
Upper Thames Clay Vales (108)	<ul style="list-style-type: none"> • Gravel extraction has left a legacy of geological exposures, numerous water-bodies including at the Cotswold Water Park, a nationally important complex of marl lakes • A high number of nationally important geological sites.

4.3 These three main landscapes are then sub-divided into more detailed landscape types, which are described in the relevant local landscape character assessments on the Council's website.

4.4 There are also a range of key landscape features, such as key views, skyline features, settlement patterns and early cultivation systems worthy of conservation and enhancement. These features and the variations in the landscape were formed as part of the historical development of the original landscape by the presence of people – and it is this combination of the natural and man-made landscape that is so crucial to the character of the Cotswold landscape.

4.5 Some aspects of landscape quality are difficult to define such as lighting/dark skies or tranquillity but are important to protect as key elements of character in the District. The PPG says tranquil areas are '*relatively undisturbed by noise from human caused sources that undermine the intrinsic character of the area.*' (Local Plan) Cotswold District and in

particular the AONB is a largely tranquil part of England (CPRE data). The CCB has produced position statements on both:

- Dark Skies and Artificial Light; and
- Tranquillity.

4.6 — Both dark skies and tranquillity are considered to be ‘special qualities’ of the Cotswolds AONB.



- 4.7 The nationally important and designated Cotswolds Area of Outstanding Natural Beauty (AONBs) covers some 80% of the District. About 6% of the District is also locally designated Special Landscape Areas (SLAs). There are policies for both the AONB and the SLAs within the adopted Local Plan .
- 4.8 The Cotswold Water Park (CWP) is the largest area of man-made lakes in the UK and covers another 6% of the District to the south east.
- 4.9 The designations often wash over settlements in the District. Although not a landscape designation as such, a small area of the District is also part of the Cheltenham Green Belt.
- 4.10 Over the next 20 years there will be many changes to the landscape of the District that do not fall within the control of the planning system including:
- changes to farming practices (due to a radical shift in public financial support for agriculture such as agri-environment schemes and changes in world markets);
 - increased tree and woodland planting as part of the national response to the climate emergency; and
 - changing species distribution caused by changes to the climate and disease (e.g. ash dieback).
- 4.11 A range of new developments will come forward, for example new housing and renewable energy installations where achieving positive outcomes for the landscape will be challenging; and there may be instances where the public benefits of a proposal, such as in addressing the climate emergency, out-weigh the requirements to enhance the landscape - notwithstanding the 'great weight' that is given in policy to conserving and enhancing of the AONB.
- 4.12 In those circumstances every effort should be made to mitigate impacts on the landscape at both local and wider scales. The creation and enhancement of on and off site green infrastructure will play a key role in protecting and improving the landscape (see Green Infrastructure topic paper) together with other benefits such as recreation, water management and nature recovery.

The Local Plan

- The White Consultants series of landscape studies and the Special Landscape Area Report can be found in the Local Plan [Evidence base](#).
 - New evidence - Cotswold District Council has commissioned consultants to prepare a Renewable Energy Strategy for the district.
- 4.13 Natural and Historic Environment Issues:
- It is imperative that the character, appearance and diversity of the District is protected and wherever possible enhanced, especially within areas of high historic, landscape or nature conservation importance. It is also important to ensure that new development is well designed; respects biodiversity and green infrastructure; and does not lead to the coalescence of settlements.

- The District's natural and historic environments are its greatest assets. The challenge is to harness these sensitive assets to economic advantage by managing tourism, agricultural diversification, renewable energy generation, mineral extraction and other changes to rural areas in a sustainable manner.
- Future housing, employment and other development will need to be suitably designed and located to minimise visual and other impacts on the sensitive Cotswold landscape and built heritage.

4.14 Key issues include:

- Conservation and enhancement of the setting of historic settlements, inappropriately designed and located development on edges of settlements;
- Tranquillity of an area as a key element of the character of the District; and
- Lighting (artificial light pollution) which can impact on landscape quality (10.4.10 -11).

[Sustainability Appraisal \(SA\) Scoping Report 2021](#)

4.15 Key sustainability issues raised with landscape Topic;

- Finding the right balance between the need for more renewable energy provision and the existing landscape character.
- The threat of losing significant landscape features, for example the loss of trees from Ash Dieback and other tree diseases.
- Change of landscape features as a result of climate change.
- change in agriculture practices, including changes to government support systems for agriculture, new crops, potential intensification, diversification and the changes as a result of Brexit from the Common Agricultural Policy to the new Environmental Land Management Scheme.
- Increased traffic, noise and light pollution.
- Increased pressure on Public Rights of Way and National Trails as a result of increased tourism
- To ensure that development is designed and sensitively located to respect the Cotswold District's landscape and built heritage.
- Making sure that the landscape is also valued for its multifunctional role including health and wellbeing as part of Green Infrastructure.

5. Current Local Plan Policy

- 5.1 The Local Plan states, *'it is vital that the character, visual quality and historic value of the landscape of the District is conserved and, where possible, enhanced'* (LP para. 10.4.2).
- 5.2 The [Review of the Local Plan](#) concluded that the landscape policies, even longer term, did not require any further update (see Annex A, C).

- EN4 – The wider natural and historic landscape
- EN5 – Cotswolds Area of Outstanding Natural Beauty
- EN6 - Special Landscape Areas

- 5.3 Nevertheless, there is a new Corporate Plan objective: making the Cotswold District Local Plan ‘Green To The Core’. Updated Local Plan policies must all cumulatively assist in delivering this objective, which entails pro-active initiatives, reducing negative and enhancing positive impacts on the natural environment, and related “green” matters (Historic Environment Topic Paper) such as renewable energy installations.
- 5.4 The impact of climate change on the landscape is likely be far reaching; changes in temperature, drought and flooding, prevalence of pests and diseases ([NCA 107 Cotswolds](#)), changes to habitats, and farming practices, as well as future renewable energy schemes and new technologies.(See Climate Change/ GI Topic Paper).
- 5.5 Local Plan policies can seek to address climate change by mitigating (i.e. reducing CO2 emissions) and adapting to the effects of Climate Change, for example by promoting Green Infrastructure (See GI Topic Paper, sustainable transport) , sustainable design, and renewable energy generation.
- 5.6 Local Plan policies tie into the ecological emergency and the provision of **net gain for biodiversity** - in order to halt its decline - and ecological networks resilient to climate change would be for both the benefit of wildlife and ourselves (See Biodiversity Topic Paper) would link in with landscape quality.
- 5.7 Key issues likely to address the district can also be found in the [Cotswold Climate Emergency Strategy](#)
- 5.8 Renewable and/or low carbon energy can be generated from various sources, such as wind farms, solar, biomass (e.g. energy crops) and decentralised heat networks. Both the NPPF and the adopted Local Plan are supportive in principle of renewable energy projects and energy efficient design.
- 5.9 The District’s high quality environment (e.g. its nationally designated AONB, historic assets etc.) generally makes development of renewable energy systems more challenging than in some other areas. Six commercial-scale renewable energy generation facilities have been built in Cotswold District since 2001, all of which are solar photovoltaic developments (solar farms) ([SA Scoping Report Appendix 2](#)). In future there may be new methods of energy generation that are less problematic in respect of visual impact - ground source heat pumps for example.
- 5.10 NPPF paragraph 158b says that local planning authorities should only approve proposed wind energy developments involving one or more turbines if they are in an area identified within the Development Plan as being suitable for wind energy developments. The Local Plan does not currently identify any areas that are suitable for wind energy developments. Therefore, unless material planning considerations indicate otherwise, applications for wind turbines are likely to be refused at present. (LP 11.10.12).

Sustainability Appraisal (SA) Scoping Report 2021

- 5.11 The consultation SA Scoping Report which relates to the partial review of the Local Plan 'scoped out' (*no action required*) landscape as a topic for further investigation. No monitoring indicator has been able to be developed to monitor change in landscape or townscape character, although possible photographic monitoring from a set point in the AONB has been suggested by the Cotswolds Conservation Board.
- 5.12 The SA Scoping Report identifies room for improvement in an updated Local Plan in respect of strengthening the potential linkages between GI, natural capital and landscape issues. At present these links are not clearly set out in the current local plan, which may lead to lack of clarity and in turn failure to achieve maximum benefits from realising the synergy between these areas. Moreover, the Local Plan does not currently take account of how net gain and natural capital will contribute to the quality of the landscape.
- 5.13 **Natural England** in their response to the SA Scoping Report suggested that landscape as a topic area should not be 'scoped out' (i.e. not examined further in the SA process) and to take a more holistic approach. Given the '*adopted plan's noted lack of explicit reference to the linkages between this topic and others such as biodiversity, green and blue infrastructure and climate change we propose that this topic is retained for further consideration in the SA process. In broad terms we would see this as securing flexibility to identify and address the linkages described above in a holistic way*'.

6. Potential Policy Responses

- 6.1 The challenge for the planning system is to deliver sustainable development; conserve and enhance the landscape, and make a significant contribution to both mitigating and adapting to climate change and the ecological emergency.

Opt 1: Retain the existing policies as they are

- 6.2 Existing policy allows consideration of, for example, some renewable energy developments which may cause some detrimental impacts to the landscape – the degree of acceptable harm is proportional to the importance (e.g. designation) of that landscape. This is particularly important within the nationally designated AONB, where there is a presumption against major development other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
- 6.3 The landscape and other policies in the current local plan enable the decision-maker to balance the level of harm/adverse impact against the public benefits of the development and, in line with NPPF footnote 60, to determine whether or not the proposal constitutes major development.
- 6.4 Landscape 'protection' policies should be retained in their existing format. The policies accord with the existing strategic objective of the Local Plan (1a) and are considered robust and fit for purpose. GI, design and other policies, which overlap with landscape, however may need further change.
- 6.5 The evidence base would not require updating; landscape character analyses could be reviewed quickly if needed and additional evidence work for the SHLAA and site allocations

has been undertaken already. Policy could continue as extant policy until the next Plan period. National policy and guidance has to date neither so fundamentally changed as to require Local Plan policy update up to 2031 ([Local Plan Review](#)). This will require monitoring for any changes that may come forward in future, as part of Glover review and the government's emphasis on "building beautiful".

Opt 2: As Option 1, plus amend and add to the supporting text

- 6.6 Amend the supporting text to include more reference to the linkages between this topic and others such as biodiversity, green infrastructure and climate change (Natural England, SA Scoping Comment, 2021) perhaps to the forthcoming Renewable Energy Strategy (to provide additional guidance) or other relevant evidence, and to help ensure the landscape is taken into account in a clearly holistic way.
- 6.7 Major development within the AONB is not permitted except in exceptional circumstances and the public interest. The policy is already interpreted in this way and therefore includes climate change as a consideration. Add to the supporting text to make it clear that the existing policy already considers 'exceptional circumstances' to include climate change/ ecological emergency when considering proposals in the planning balance.
- 6.8 By retaining the landscape policies broadly as is, they remain a counter-weight to increased pressure for development and can be considered on a case by case basis in the planning balance.

Opt 3 – Climate-led not landscape-led policy

- 6.9 Investigate further policy options to be as 'green to the core' as possible, in light of the Corporate Strategy and declared emergencies.
- 6.10 There are significant challenges and opportunities in how to approach climate change mitigation while also being consistent with national policy and designations to conserve and protect the landscape. A key issue for all stakeholders is finding the balance between protecting our very important landscapes and their potential degradation by climate change with the need to adapt to, and mitigate the causes, of climate change in a beneficial 'value added' approach. As the Cotswold Conservation board (Cotswold National Landscape) vision states '[find outcomes which offer the most positive benefits and the least negative impact.](#)'
- 6.11 Consider new possibilities; set out a positively worded policy or clauses specifically supporting climate change mitigation/adaptation in the landscape, consider different types RE technologies, alongside criteria to reduce any significant detrimental impact on landscape. Perhaps find ways to adapt the landscape to actual effects of climate change, for example through the choice of species and water management techniques etc.
- 6.12 Such as:
 - o Require more (major) development to provide... trees, protect soils, flood storage areas, walking/cycle routes etc (e.g. biodiversity, flood, GI policies)

- o Allocate sites for RE or electric vehicle charging points for example, whilst taking landscape into account including cumulative impact on the landscape... (in possible RE policy?)
 - o Be more encouraging of appropriately scaled RE development in the countryside, including wind turbines?
 - o Consider larger scale RE such as solar energy provision both inside and outside the AONB; safeguarding areas outside the AONB to avoid eg their use as housing development, and consider 'broad areas' where wind turbines may be appropriate within the AONB?
 - o Consider other RE technologies in a sequential way (least suitable RE last) perhaps, such as to promote biomass energy (from crops or woodland) or ground source heat pumps which have less impact on landscape (see RE policy?)
- 6.13 The evidence base could be updated to assess the impact different types and sizes of wind energy development (and consider other RE such as solar) would have on the AONB and identify any areas which may be capable of accommodating large scale/ major wind and renewable energy development. A detailed "fine grain" landscape assessment of the AONB will be needed to identify relative sensitivity. The renewable energy strategy for example may help provide additional guidance on where, in landscape terms, renewable energy is best located, in addition to current consideration of such proposals on a site by site basis.
- 6.14 Appropriately-scaled wind turbines could be acceptable if they are well designed and sited so as to be assimilated with existing development and provide some energy to local farms, small communities. An updated evidence base could be used to directly inform a policy on the issue.

Policy Approach	Discussion of impacts, effectiveness etc - justification
<p>(A) Preferred Option: <i>Policy remains unchanged, but additional comment(s) in supporting text</i> <i>Possible in partial update</i></p>	<p>No change to policy but supporting text amended in light of Corporate Strategy and Climate Change/ecological declarations. Ensure explicit holistic approach, landscape is taken into account. Point to GI, RE etc. Supporting text could also be an addition to Option C.</p>
<p>(B) Rejected Option : <i>No Change</i></p>	<p>No change to policy – no change to NPPF/PPG to require update or DM request for clarity</p>
<p>(C) Alternative Option <i>Investigate further landscape policy options to be 'green to the core' in light of Corporate Strategy and declared emergencies.</i></p>	<p>more presumption in favour of Climate Change mitigation/adaptation? A more Climate-led landscape policy? Consider new possibilities such as; Additional clause to support climate change mitigation and adaptation, including</p>

<p><i>May need to be in a full review of the Local Plan.</i></p>	<p>RE development both large and small scale (criteria?).</p> <p>Broad locations for such development - even in the AONB? Can policy be more climate change-led than landscape-led?</p> <p>Promote RE that does not harm the landscape and is even beneficial – e.g. woodfuels where it leads to improved woodland management.</p> <p>Additional evidence and time may be required to bridge the gap between further possible policy proposals/ recommendations and update to Local Plan.</p> <p>Landscape policies already help maintain the planning balance in the whole LP and protect the landscape.</p> <p>Not sure if this would comply with National Policy and guidance. May be possible in future if government support</p>
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