

Stage 1 Landscape Screening Methodology for Sites Located within the Cotswolds National Landscape

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COTSWOLD
District Council

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1. Purpose

- 1.1 To identify sites at an early stage where landscape designations and significant landscape sensitivity indicate that development would be highly unlikely to conserve and enhance the landscape and scenic beauty of the Cotswolds National Landscape. This enables a proportionate assessment of sites by identifying those that are highly likely to be unsuitable for development from the outset, even before undertaking a detailed sensitivity assessment (Stage 2).

2. Justification

- 2.1 Sites being deemed to be unsuitable for development due to significant harm to the Cotswolds National Landscape is justified by national policy and guidance.
- 2.2 Paragraph 189 of the National Planning Policy Framework (December 2024) (NPPF) confirms that National Landscapes (formerly Areas of Outstanding Natural Beauty) must be given the highest status of protection, with a duty to conserve and enhance landscape and scenic beauty. Discounting sites that clearly would not conserve or enhance landscape and scenic beauty of the National Landscape supports paragraph 61, which requires Local Plans to be underpinned by relevant and up-to-date evidence, and helps demonstrate a sound strategy that is justified, effective, and consistent with national policy.
- 2.3 Similarly, Paragraph 190 states that major development in National Landscapes should be refused except in exceptional circumstances and where it is demonstrably in the public interest.
- 2.4 Planning Practice Guidance (PPG) reinforces this approach:
 - i. Paragraph 014 (Ref ID: 3-014-20190722) confirms that constraints, including landscape impact, should be considered early and that sites may be excluded where designations render them unsuitable.
 - ii. Paragraph 041 (Ref ID: 8-041-20190721) notes that development in National Landscapes should be limited, and such areas are generally unsuitable for meeting unmet needs from adjoining non-designated areas.
- 2.5 This policy framework is now underpinned by a strengthened statutory duty introduced by Section 245 of the Levelling-up and Regeneration Act 2023. This replaces the previous requirement for relevant authorities to merely “have regard to” the statutory purposes of National Landscapes with a new duty to

actively “seek to further” those purposes. The accompanying statutory guidance (Defra, January 2024) makes clear that this duty applies to the preparation of Development Plans and associated assessments and documents, and that relevant authorities must act in a way that furthers the conservation and enhancement of the natural beauty of Protected Landscapes. This significantly raises the bar for how landscape impacts are considered in Local Plans.

- 2.6 Natural England’s 2023 position statement aligns with this direction, advising that Local Plans should avoid allocating sites where development would harm the character or special qualities of a National Landscape. Major development should only be considered suitable where exceptional circumstances can be demonstrated.
- 2.7 This is further reinforced by the Cotswolds National Landscape Management Plan (2025-2030), specifically Outcome 11 – Development and Infrastructure, which states that development should be avoided in prominent or sensitive locations where it would harm landscape character or the setting of settlements. The plan also emphasises the need for development to be landscape-led and to positively contribute to the character and special qualities of the National Landscape.
- 2.8 In this context, early-stage site filtering based on likely significant harm to the Cotswolds National Landscape, and thereby failure to conserve and enhance landscape and scenic beauty of the National Landscape, is not only appropriate but essential to fulfil statutory duties and to accord with national planning policy.

3. Screening Process

- 3.1 The following criteria have been used to screen sites:

1. Screening Criteria

Each site is reviewed against the following queries:

- i. **Has this site previously been found unsuitable due to landscape harm (e.g. in past appeals, assessments, or Local Plan work) and does the reasoning still provide a strong justification for a site being unsuitable?**
 - Assessed to have an overall 'High' landscape sensitivity in previous Council-led landscape assessments (e.g. White Reports 2000, 2014, 2015) due to harm to the National

Landscape, and where there has been little or no change in landscape conditions near or within the site (e.g. no additional substantial development has occurred near to the site).

- The site was refused planning permission due to harm to the National Landscape, and the currently proposed development is similar in scale and type to the refused proposal and there has been little or no change in landscape conditions near or within the site (e.g. no additional substantial development has occurred near to the site).

ii. Would development result in significant harm to the character of the National Landscape?

Sites located within the National Landscape will be discounted where three or more additional 'High' judgements are recorded in the Stage 1 assessment against High Sensitivity Indicators. These indicators closely align with the Special Qualities of the Cotswolds National Landscape, reflecting the area's sensitivity to change in relation to its scenic beauty, settlement form, and cultural heritage. They recognise the importance of protecting the Cotswolds' distinctive landform and skylines, visual openness and rural character. The focus on heritage features, settlement pattern, and separation between villages also supports the conservation of the area's historic environment and traditional landscape structure, both of which are integral to the Cotswolds' identity and sense of place.

High Sensitivity Indicators include:

- Adjacent to/designated heritage features (e.g. Conservation Areas or Scheduled Monuments) and could have a significant adverse impact
- Located on or close to prominent ridgelines, escarpments, or high ground
- Falls within clear views from public vantage points (roads, PRowS, hills)
- Would extend the settlement in an uncharacteristic direction or weaken its structure/form
- Introduces a significant area of built form into a rural or visually sensitive landscape
- Would not be attached or adjacent to existing development
- Risks coalescence or erosion of settlement separation

If yes, the site has been assessed as being of 'High' sensitivity, therefore the site should be discounted. If uncertain, or criteria are marginal, flag for caution and review at Stage 2.

2. Categorise

Based on the questions above, categorise the site based on the following outcomes:

Outcome	Criteria Met	Action
Discount	Site is within the National Landscape and is deemed to have 'High' sensitivity to development.	Exclude from Stage 2 assessment
Flag for Caution	Site within the National Landscape and has a level of sensitivity. However, further assessment is required to determine overall sensitivity rating.	Carry forward for Stage 2 assessment with caveat
No Constraint	Site within the National Landscape and has limited sensitivity to development.	Carry forward for Stage 2 assessment

3. Brief Justification Note

A short 1–2 sentence note is then provided to summarise the reason for the decision. These will read similar to the following:

"Site lies within the Cotswolds National Landscape and occupies an elevated, exposed position highly visible from public viewpoints. Development would harm the nationally valued landscape character and setting and therefore the site has been discounted."

Or:

"Site was previously dismissed at appeal/discounted due to significant landscape harm to the National Landscape. The proposed development is similar in scale and type to that which is currently proposed. Therefore, the site has been discounted."

4. Stage 2 Assessments

- 4.1 The Stage 2 landscape assessments of sites will follow a standard five point scale of: Low; Low / Medium; Medium; Medium / High; and High. The full methodology will be provided in the final report.