

# **THE COTSWOLD WATER PARK: IMPLEMENTING THE MASTER PLAN**



## **Green Balance**

for

**CPRE Gloucestershire and Cotswold Water Park Trust**



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Cover image:

Match fishing area at Lake Pochard, near South Cerney, Cotswold Water Park

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## **SUMMARY**

S1. This report considers the future of the Cotswold Water Park. This 40 square mile area in the upper reaches of the River Thames lies mainly in Gloucestershire and Wiltshire and continues to provide a significant source of sand and gravel for the construction industry. Mineral working drives change to the landscape of the area, often creating lakes due to the high water table. This generates opportunities for new activities in, on and around the water, mainly for a variety of recreational uses ranging from watersports and angling to walking and birdwatching. A Master Plan for the Cotswold Water Park was published in 2008 with the support of local authorities and numerous local interests across the area. For various reasons there has been little implementation of the Master Plan since, so a primary task of this report is to establish how fit for purpose the Plan remains. The report then identifies those of its objectives which should be prioritised for implementation.

S2. Reinvigorating the strategic vision for the Cotswold Water Park will depend in large measure on the degree of support for the Master Plan's objectives amongst local interests. To establish this, twenty face-to-face interviews were held with a cross-section of local authorities (officers and councillors), parish councils, landowners, mineral companies, developers of after-uses and special interest organisations. The report finds many of the Master Plan's objectives to remain appropriate in full or in part and the priorities for obtaining better outcomes for everyone from the process of change also clear. Practical works on the ground to implement a landscape strategy across the Water Park, a landscape-scale biodiversity strategy and an access and public rights of way strategy are key. A good practice guide to the restoration and after-use of mineral sites would help to achieve these.

S3. The report reviews how local authorities with responsibilities in the area could better co-ordinate their activities, especially their land use planning functions, in the interests of the Cotswold Water Park as a whole, in line with the commitments they made in 2008. It evaluates the scope in principle for using Supplementary Planning Documents for this purpose. Integrated land use planning across the area would probably be achieved best by a joint Local Plan or an Area Action Plan, which would take considerable time to put in place. However, a good start to integration could be made by local authorities adopting each of the proposed three strategies and good practice guide as Supplementary Planning Documents (SPDs). The existing boundaries of the designated Cotswold Water Park area are reviewed and found unsuitable for SPD purposes; they should therefore be reviewed.

S4. Neighbourhood Plans did not exist in 2008 when the Master Plan was issued. The report considers the role these might take individually in furthering the wider interests of the Cotswold Water Park. Considerable scope for alignment with the proposed strategies (SPDs) is identified, together with a role for the Cotswold Water Park Trust in showing how Parish Councils could use Neighbourhood Plans to create benefits after mineral working.

S5. The interviews show widespread support for the Cotswold Water Park having its own distinct identity. Much more could be done to create a sense of place with practical support from all parties. There is enthusiasm for the funding of much improved internal and external communications, promotional materials, branding and marketing.

## 1. INTRODUCTION

1.1 The Cotswold Water Park is an area of 40 square miles, with more than 150 lakes, set across the countryside of Wiltshire and Gloucestershire, extending into Swindon and West Oxfordshire. It lies in the upper reaches of the River Thames and has been shaped since the Second World War primarily by the pattern of sand and gravel working locally. The high water table in the area has left lakes after mineral extraction, only a few of which have been filled with waste materials. The lakes and their surroundings have created a new landscape and opportunities for a wide range of new land uses and activities, ranging from water sports and holiday homes through to angling and the quiet enjoyment of wildlife habitats.

1.2 During 2007-08 the consultancy firm Scott Wilson carried out a three-stage *Strategic Review and Implementation Plan for the Cotswold Water Park*. The concluding stage in July 2008 was a *Vision and Implementation Plan*, commonly referred to as the Master Plan. The review was carried out for the Cotswold Water Park Joint Committee, a partnership body at the time which provided a forum for all the major interests in the area to promote the sound management of the area. The Master Plan was funded principally by the local authorities covering the Water Park area. It was widely supported, notably with local planning authorities making commitments in their statutory development plans to promote the objectives identified for the area. The Master Plan still represents the most recent and thorough democratically agreed statement of intent for the Cotswold Water Park. However, for various reasons including the loss of some local authority funding during the cutbacks in public sector expenditure, the Implementation Plan proposed by Scott Wilson for the five years following its publication have largely not been carried forward.

1.3 The Cotswold Water Park Trust is the charitable body which champions the area, manages projects throughout the Water Park and on sites under its control, and works to maintain the special character of the area for future generations. A selection of land assets within the Water Park has been vested in the Trust by local authorities and are now managed for public benefit. It has eight staff and an annual turnover typically around £450,000, funded primarily by grant aid and bids for projects to grant-giving bodies (plus other smaller sources such as trading activities, donations and membership subscriptions). The Trust acts as a focus for Cotswold Water Park-related activities and discussions, but inevitably lacks the capacity to promote the *Vision and Implementation Plan* as much as it would like, and does not have formal powers to ensure the intended outcomes.

1.4 CPRE Gloucestershire is the Gloucestershire Branch of the Campaign to Protect Rural England, an independent charity funded by membership and public donations. CPRE believes that the Cotswold Water Park is a unique and valuable landscape but due to a lack of a co-ordinated approach is in danger of failing to meet its full potential as a treasured environment, a recreational area and a coherent landscape. CPRE believed that through an informal partnership with the Cotswold Water Park Trust it could help by providing funding for a revitalising review of the Master Plan. It could also see that there was an urgent need to gather objective evidence for the local plans being prepared by both Cotswold DC and Gloucestershire CC, to influence their development policies for the Water Park.

1.5 Both organisations are keen to reinvigorate the strategic vision for the Cotswold Water Park expressed in the Master Plan where this remains relevant. The opportunities created by mineral working and new investment in after-uses are inherently capable of achieving substantial public benefit for visitors and residents alike. New challenges are opening up as sand and gravel working moves increasingly to the central area of the Water Park as existing concentrations of operations west of the A419 (around Cricklade, South Cerney, Ashton Keynes and Somerford Keynes) and in the east between Fairford and Lechlade are worked out. Mineral working is a long term activity, but decisions taken now will shape the character of the Water Park for years to come. Visitors are important to the local economy, but more could be done to link this contribution to benefits for residents. This report is an initial contribution to directing this enthusiasm towards practical achievements.

### Aims and objectives

1.6 The aim of the study is to identify a course of action to implement the key objective for the Cotswold Water Park outlined in the Master Plan: “...to create a distinctive and sustainable countryside of high environmental value for the benefit of local residents and people working in and visiting the area.”

1.7 The main objectives are to identify:

- achievable medium term (next five years) actions;
- what needs to be done to extract from the Master Plan material for a useable Supplementary Planning Document to support water park/ gravel extraction policies in Local Plans (Cotswold District Local Plan, Gloucestershire County Council Minerals Local Plan and Wiltshire Council’s Local Plan); and
- how the Cotswold Water Park Trust can establish itself in an accepted leadership role for the implementation of the Master Plan.

1.8 The Brief advises that the following specific issues will need to be addressed:

- (i) Review the Master Plan and report on ways in which it is or is not ‘fit for purpose’ as a planning document to support the achievement of the Plan’s objectives, in terms of both planning efficacy and harnessing the support of stakeholders.
- (ii) Advise on which parts of the Master Plan are most susceptible to delivery and where initial focus could be brought to achieve the greatest impact.
- (iii) Suggest which parts of the Master Plan have the content which could form the basis for a workable Supplementary Planning Document for adoption by planning authorities in support of Local Plan/mineral plan policies on development in the Water Park. Suggest the format of such an SPD and how it might be used to support emerging neighbourhood plans.

## The Master Plan

1.9 The Master Plan offers an integrated set of programmes for the promotion of public benefits across the Cotswold Water Park area. The breadth of its objectives is inspiring but also daunting. As a vision it demonstrates a great aspiration for the achievement of its objectives to be tied into each other, though in that complexity its priorities are not so clear. Then as now the expectation was that the Cotswold Water Park Trust would lead the implementation but could not possibly achieve everything by itself. The Trust's role is just as much to persuade others to play their part to achieve tangible results. The more this happens, the stronger the partnership, the greater the collective buy-in and the more that can be achieved.

1.10 The Master Plan is 7-8 years old and the context for its implementation has changed in some important respects. Neighbourhood Plans and the localism agenda are wholly new since the Master Plan was drafted, for instance, and are beginning to take an important role in shaping local planning practice, while North Wiltshire DC's functions have been taken over by Wiltshire Council. The content of the Master Plan may well have faded in people's memories over the intervening years, while new participants, such as newly elected Councillors and new senior staff in local government, may well have little knowledge or appreciation of its contents or sophistication – expectations amply borne out in our discussions with interested parties. None of these points necessarily invalidate the vision, but they do indicate a need to refresh the priorities and consider adjusting the means of implementation.

## This Review

1.11 Implementation of the Master Plan is primarily an exercise in carrying people along with the principles and proposals, just as the preparation of the Plan was similarly an exercise in participation and partnership. The local people, businesses, public bodies and interest groups who all have a commitment to the area are those who will decide whether achievement of the Master Plan's objectives is a prize they can win. Our initial task as consultants from outside the Cotswold Water Park has therefore been to identify the hopes, fears and priorities of those local bodies in a position to give the Master Plan its wings. We therefore visited as many and as wide a range of people as resources for the project allowed (the twenty meetings are listed in Appendix 1). As our clients were more familiar with local organisations than ourselves, they chose the interviewees on our behalf based on categories we proposed.

1.12 In our meetings we raised as many issues as practicable from the Master Plan. Some questions were asked of almost all interviewees, while additional questions on special issues were put to those closely involved with them (for example, the Royal Society for the Protection of Birds (RSPB), Natural England and the Farming and Wildlife Advisory Group (FWAG) were asked in more detail about issues raised in the Biodiversity Objectives of the Master Plan). The scope of the Master Plan is so large that we decided at the outset not to investigate at all objectives for the historic environment, the arts or climate change, and some of the other objectives could only be covered in part. Our meetings all ran to at least an hour, but even so could not always cover all the intended questions. Nonetheless, by

using semi-structured interviews we were able to explore issues of particular interest and gain a valuable insight into participants' broader aims, opinions and concerns. The limited sample size both of interviewees and for many points raised was therefore to some extent compensated by a greater depth of understanding, and far superior to a questionnaire survey. We investigated issues raised in the Master Plan, and heard additional matters raised in discussion, but have not introduced any wholly new ideas of our own. Our findings are therefore strongly rooted in the discussions we held.

## 2. THE MASTER PLAN'S FITNESS FOR PURPOSE

2.1 Chapter 4 of the Master Plan, the longest, sets out the 'Key Objectives' under a series of fourteen headings, all but three of which this review has included to some degree (see paragraph 1.12). Objectives are the centrepiece of the Master Plan and are listed in boxes under each of the Master Plan's headings (though items barely pursued are indicated by square brackets). Inviting comment on the issues raised by the objectives was central to our interviews. The findings below summarise the results from these, supplemented by a commentary. Continued support for objectives in the Master Plan amongst interested local parties is not the only criterion for establishing that these objectives remain 'fit for purpose', but it is an important consideration. Objectives with wide support are much more likely to be capable of implementation, especially within the next five years, than those without it. This is especially important given the lack of direct implementation powers available to the Cotswold Water Park Trust, and therefore its reliance on persuading those with the necessary powers to use them. The commentaries provide a brief reality check on objectives' fitness for purpose. These take into account as necessary whether circumstances have changed since 2008, alternative means of achieving the objectives, and whether the objectives need updating for any reason.

### Countryside, Communities and Settlements Objectives

<u>Countryside, Communities and Settlements Objectives</u>	
i	Establish a defined Landscape Strategy for the CWP in order to facilitate more appropriate landscape design to changes in the past, present and future.
ii	Through constructive stakeholder involvement, identify development and land use change that is designed to complement and enhance the landscape, countryside and settlement character of the CWP, which will engender improved well-being, vitality and prosperity for the area as a whole.
iii	Establish actual links between the countryside and settlements of the CWP using strong landscape features; the establishment of key settlements as CWP centres of activity; securing the provision of open public spaces close to settlements; and the development of an integrated leisure infrastructure network.
iv	Encourage stronger ties between the CWP as a defined place and the residents that live there by promoting resident participation in the full range of activities that can be undertaken; adopting a consistent branding strategy to be incorporated into the marketing, information and promotion; and establishing a programme of cultural events.

2.2 Interviewees across the spectrum considered that the landscape of the Cotswold Water Park was a valuable resource worthy of protection and improvement. Almost everyone who was asked whether a Water Park-wide landscape strategy would be of interest, focussing on landscape design and landscape enhancement, agreed this. Both the mineral companies interviewed supported this strategic approach and there was strong support from the Parish Councils. Some interviewees were mindful that the need was not for a vision but for a detailed practical guide which could be implemented by the Mineral Planning Authorities (MPAs), Local Planning Authorities (LPAs), landowners, developers and mineral companies. This would mean setting down clearly the kind of landscape residents and other parties wanted to see across the whole area likely to be worked for minerals, while allowing flexibility to accommodate individual schemes. Of the Mineral Planning Authorities, Gloucestershire County Council opposed the idea as not realistic, while Wiltshire Council wanted to look into the benefits and compare them with current

arrangements. A Landscape Character Assessment was initially prepared for the Cotswold Water Park in 2006-07 by LDA Design, commissioned by Wiltshire County Council. This was extended in 2008-09 to provide the evidence base for informing strategic and landscape management guidance in an *Integrated Landscape Character Assessment* (August 2009). There is clear support for preparing that guidance now to achieve objective (i). The process of doing this can also be expected to assist the implementation of objective (ii). The only uncertainty or resistance is coming from local government – the authorities who signed their agreement to the Master Plan in 2008. Part of the task will be to win them back.

2.3 The case for a leisure infrastructure network (objective (iii)) was widely shared, for the benefit of both residents and visitors. The Public Rights of Way network provides many opportunities for walking and in some cases cycling and horse-riding, but has its limitations. Examples were presented of limitations such as:

- missing links which would open up much improved opportunities if resolved, including footpaths and a cycle track beside a dangerous section of the Spine Road;
- rights of way stopped up when mineral working took place, never to be reinstated;
- temporary closures of rights of way during mineral working which are not reinstated or this is greatly delayed;
- unjustified closure of rights of way around lakes by after-use developers;
- inadequate maintenance of the vital cycle track alongside the Spine Road.

2.4 The legitimate frustrations of residents, expressed by Parish Councils, were shared at a more strategic scale by other parties. There is widespread support for low-key public enjoyment spread throughout the Cotswold Water Park, and this depends on a reliable network of rights of way, small public car parks and upkeep. At present the local authorities (as highways authorities or planning authorities) are not pursuing a public access strategy and are not giving the reinstatement of rights of way the attention which the significance of the issue to the parties would indicate. In one case, a footpath officer faced with the apparent unauthorised closure of a right of way is alleged to have advised residents themselves to negotiate with the landowner, rather than the highways authority take responsibility to enforce the law.

2.5 The Master Plan access objective (iii) remains fit for purpose. There is a clear need for a detailed plan to identify the rights of way network required across the Water Park. This would specify gaps that should be remedied, particularly following mineral working (ideally identified and resolved in advance of permission being granted), and highlight rights of way awaiting reinstatement following mineral working. At present, opportunities for improving the rights of way network are being lost and the perception is that this is not a priority for local authorities. This could readily be resolved by more assertively using the legislation to protect rights of way and by the authorities taking a network-based approach to the issue rather than treating each planning application as a one-off. Landowners have understandable misgivings about being responsible for any more rights of way than necessary, in view of their public safety liabilities and notably where this is close to lakes. Nonetheless, the mineral companies interviewed accept the case for access (and one promotes it), and would welcome more co-ordination from the Cotswold Water Park Trust. The matter is so important to the future of the Water Park that building on this sympathy and overcoming any difficulties should be prioritised.

2.6 Objective (iv) encouraging stronger ties between residents and the Cotswold Water Park as a defined place suggests an unhealthy degree of disengagement of residents at present. Certainly none of the Parish Councils felt that residents identified with the CWP as a place where they came from, lived and worked in. Parish Councils were nonetheless as passionate about their localities as others elsewhere. The inevitability in principle of mineral working in the area is widely understood, and therefore landscape change and the scope for new land uses afterwards has a level of acceptance locally. The problem of lack of identity was not the insufficiency of branding – though there was support for better signage, landscape improvement and promotion – but the weakness of the Cotswold Water Park as an entity.

2.7 The public realm in the more intensively used parts of the Water Park is poorly maintained and there has been an urbanising impact west of the A419. Indicators of gravel working remain with former site accesses, dust in the verges and hedgerows, and gravel on roadside paths – though much reduced mud on the roads. The environment has been transformed but too many benefits have gone missing. Examples are:

- lakes treated individually without regard to vistas;
- trees allowed to take the wind from the adjacent sailing lake; and
- weight restrictions placed on roads without sufficient attention to routes which mineral lorries will then follow.

Development continues to be allowed (both mineral working and after uses) in a piecemeal fashion rather than in a way which would demonstrably lead to improvements and new public benefits in due course according to a clear plan. The local authorities do not take enforcement seriously (staff cutbacks were clearly an issue here, though attitudes matter too), so inevitably landowners and occupiers have not always pursued conditions on planning permissions with the vigour that residents hoped for. The lack of engagement of residents with the Cotswold Water Park is not a measure of the spirit of the residents but of the spirit of the place. Residents felt that no-one in a position of authority was taking responsibility for raising standards in the Water Park, and our discussions with local authorities reinforced this.

2.8 Our finding is that marketing, information and branding will not by themselves achieve the greater engagement of residents with the Cotswold Water Park. Objective (iv) for greater community engagement depends not on this and cultural events but on a more fiery commitment and positive attitude to achieve the potential of the Water Park. We found this strikingly more prevalent amongst private sector interviewees involved in after-uses than in the public sector: that is a good start, but decisions on the best interests of the Water Park are properly matters of public choice and duty of care rather than commercial advantage. Local government needs to raise its game, massively. The ambition which surrounded the Master Plan in 2008 and which all the local authorities signed up to needs to be recaptured.

2.9 Despite this conclusion, the element of objective (iv) on ‘adopting a consistent branding strategy to be incorporated into the marketing, information and promotion’ should not be overlooked. It remains relevant to the achievement of other features in the Master Plan. Chapter 6 on ‘Management and Governance’ identifies four ‘requirements’ of

which one is a 'Profile Requirement' to raise the profile of the Cotswold Water Park. The Master Plan proposes handing to the Cotswold Water Park Trust "the political task of building up the profile of the CWP in order to raise it as a priority regionally and within the local authorities and to ensure that it matches the competing calls on their time and resources" (paragraph 6.1).

2.10 Stronger branding of the Cotswold Water Park was enthusiastically supported by the private and voluntary sectors. The mineral companies saw the area as a success story and wished to promote what mineral working could achieve. Developers of after-uses considered that a marketing strategy for the area was lacking and that the area should be promoted, as Tourist Boards do elsewhere. Landowners pointed out that the area had little identity, but that with a better sense of place it could become a superb destination. RSPB and FWAG foresaw a virtuous circle from promotion, with more people and money being brought into the area enabling improvements to the biodiversity network and water quality management. Parish Councils were more cautious, with most seeing benefits if branding was carried out in the right way, e.g. supporting quiet recreation rather than theme parks or coach tours. There was some support from local authorities but more muted.

2.11 The interviews show that the reasons for wanting branding varied (fundamentally all the parties primarily wanted marketing), and therefore that pinpointing an agreed brand is unlikely to be straightforward. However, once it is agreed then the promotion required would be much the same. The Master Plan clearly considered that branding was one of the ways to unlock the potential of the Water Park, and that a series of connected benefits would follow. For example, it argued:

- "the aspiration for a landscape scale approach to biodiversity development would provide the CWP with a unique attribute that would raise the profile of the area on a national basis" (paragraph 4.17);
- "There is also scope for innovative development to appeal to niche sectors and to raise the profile of the CWP amongst other market sectors" in respect of sporting opportunities (paragraph 4.21);
- "the profile that the CWP could have by achieving its biodiversity aspirations" would provide market appeal for tourism (paragraph 4.29); and
- "An angling centre of regional and national repute that would raise the profile of the high level of angling provision in the CWP" (paragraph 5.9).

2.12 We conclude that the very limited marketing of the Cotswold Water Park has held back the potential for achieving the Master Plan's objectives. The branding element of objective (iv) could achieve substantial benefits, especially if carefully managed as part of a wider marketing exercise in a package with improved management of the area, more co-ordinated strategic planning, and a visitor pay-back or sponsorship scheme. This objective remains very much fit for purpose even though no action has been taken on it since 2008.

## Biodiversity objectives

<u>Biodiversity objectives</u>	
i	Via the CWP BAP, deliver a landscape-scale conservation approach that traverses the whole of the CWP area, utilising the inherent neutral grasslands, the reedbeds and the floodplain grazing marsh to ensure that the CWP becomes a premier site for conservation in the UK.
ii	Integrate the CWP BAP objectives and principles into the planning framework of the respective local authorities. This will eventually be translated into more specific policy statements in the proposed Area Action Plan for the CWP (see Planning section).
[iii]	Ensure that biodiversity targets and aspirations are integrated within all types of development and activities in the CWP (including agriculture, sports, leisure, recreation, tourism, mineral extraction and even settlements) as a means of delivering the BAP aspirations.]
[iv]	Establish appropriate initiatives that will support the delivery of biodiversity creation and management in the long term, including visitor amenities, local community partnerships and business partnerships.]
v	Secure signature nature sites and reserves with public access associated with appropriate organisations (RSPB, Wiltshire Wildlife Trust, Natural England and the CWPS) that will promote and authenticate the wildlife credentials of the CWP.
vi	Explore innovative projects that seek to capitalise on environmental conservation for mutual benefit (e.g. eco-lodges).
vii	Strengthen the role of the Nature Conservation Forum (NCF) in promoting the development of the area for biodiversity.

2.13 Biodiversity has continued its rise up the priority list since the Master Plan was published. Although implementation of the Master Plan has stalled, this is not true of the *Cotswold Water Park Biodiversity Action Plan 2007-2016* (BAP) also published in 2008 by the (then) Cotswold Water Park Society. A commissioned report in 2013 highlighted “Delivery of the BAP is making good progress; 23.5% of Targets have been delivered or exceeded and a further 50% of Targets have received some progress, with 36.7% being on, or ahead, of schedule.” The BAP strategy is aligned to the Master Plan and remains a key force shaping the activities of the Nature Conservation Forum for the Cotswold Water Park (a partnership body). At the same time, Hanson Aggregates has a contribution to biodiversity at every site as a corporate objective (and Gloucestershire County Council inclines to the same approach in its mineral planning), while Hills Quarry Products usually includes biodiversity in after-uses and has passed completed sites to Wiltshire Wildlife Trust.

2.14 Objective (i) for a landscape-scale programme to create substantial new habitats of considerable wildlife importance was universally supported by interviewees asked, not just by RSPB, Natural England and FWAG. The mineral companies considered they could help to achieve this and would be proud to do so. Many supporters envisaged this as part of a strategy of green infrastructure (also part of the vision of the Master Plan), linking public access and landscape improvement with biodiversity enhancement and compatible new land uses. The maps accompanying the vision in the Master Plan were generally considered by interviewees as difficult to understand, including on green infrastructure. They were indicative rather than Ordnance Survey-based and needed to be fleshed out to be useful. Devising the strategy would need to be co-operative amongst the various parties and allow an element of flexibility in local delivery. Achieving these would open up significant tourism benefits, both by helping to spread visitors around the Water Park and potentially by providing an attraction for wildlife tourists.

2.15 The Master Plan identifies ‘signature nature sites’ in objective (v) as integral to the wider achievement of its vision for the Cotswold Water Park. These would have the capability to generate revenue, business support and conservation ‘champions’, and to integrate nature conservation into other visitor attractions. This is encouraged by the RSPB and would assist Natural England if additional sites in the area can be notified as Sites of Special Scientific Interest – which are prioritised for funding. FWAG and the RSPB were mindful of the benefit of visitor payback schemes, generating revenue for additional investment back into the Cotswold Water Park. Given the public sector financial cutbacks, alternative sources of funding like these can be expected to take on additional significance in future strategies. The economic dimension to premier wildlife sites reinforces the continued fitness for purpose of this Master Plan objective.

2.16 A significant feature in the Master Plan is a biodiversity corridor through the central section of the Cotswold Water Park. As gravel extraction moves into this area, often working only to shallow depth, the opportunity is foreseen to create a substantial area of reedbed and other habitats. This is an important part of the RSPB’s aspiration for the Water Park, and biodiversity is expected to be a significant feature in the evolving proposals for extensive gravel working around Down Ampney. The Master Plan’s strategic biodiversity objective (i) remains very much fit for purpose and a prime candidate for implementation. Funding should not be unduly difficult to find in view of the wide-ranging support for it.

2.17 The local authorities tacitly accept the case for progress with a biodiversity strategy and acknowledge that its implementation will require formal ‘teeth’. The achievement of objective (ii) will require the active and ongoing engagement of staff in future in adopting and applying planning policies, particularly in Wiltshire Council’s and Gloucestershire County Council’s roles as Mineral Planning Authorities. This would be a highly efficient use of local authority staff resources: the biodiversity strategy is linked to tackling numerous objectives for the Cotswold Water Park including access, landscape and tourism. There is some prospect that interested parties supporting the strategy would help the authorities to maintain an enduring staff commitment to the task. Objective (ii) remains fit for purpose.

2.18 There will always be opportunities for innovative projects that seek to capitalise on environmental conservation for mutual benefit, in line with objective (vi). The RSPB pointed out that ‘eco-lodges’ might individually achieve this in varying degrees, but that other aspects of these developments such as density will be important too. Habitat First reported that holiday homes to the rigorously high Passivhaus standards for energy efficiency have been built on the Lower Mill Estate. The objective remains fit for purpose.

2.19 The Nature Conservation Forum (NCF) role in promoting the development of the area for biodiversity appears to have diminished since 2008. Public sector participating bodies such as local authority planners, the Environment Agency and Natural England all increasingly struggle to find sufficient staff to be able to prioritise NCF meetings, alongside the main NGOs and local interest groups, and the body now meets less frequently. There is some potential to reinvigorate its role if it could be at the heart of promoting a biodiversity strategy for the Cotswold Water Park (objectives (i) and (ii)). The Master Plan’s objective (vii) therefore remains fit for purpose, even if achieving it has become more of a challenge.

## Sport, Leisure and Recreation Objectives

<u>Sport, Leisure and Recreation objectives</u>	
i	Establish a series of watersports facilities that collectively present the CWP as a significant destination that could be of regional, if not national, importance for sports such as rowing, sailing, triathlon, canoeing/kayaking and water skiing.
ii	Deliver signature developments that have a significant market fit with other sports, especially for golf, angling and diving.
[iii]	Building upon the success of Keynes Country Park, promote the development of associated leisure and recreation facilities that could act as flagship projects and activities. This could conceivably include a farmbased attraction and an aqua-adventure centre.]
[iv]	Fully integrate other potential projects into the CWP area for the delivery of leisure and recreation amenities, particularly in relation to the regeneration proposals for the canals and the Cricklade-Swindon Railway.
v	Develop a comprehensive and integrated network of leisure and recreation routes, designed to deliver a quality experience for all types of users, including walkers and hikers, dog walkers, cyclists, horse riders, runners and general sightseers; the network is to connect all parts of the CWP area and is to be fully integrated in respect of management and transport with all other components of the CWP to meet sustainability objectives.
vi	Ensure that there is equity of access to sports, leisure and recreational amenities provided across the CWP.

2.20 To explore objective (i), local authorities and Parish Councils were asked an open-ended question about greater provision for a wide range of watersports, perhaps of regional or national significance. Most respondents were open to the idea but not seeking it. Only Cotswold DC supported the idea, as part of its tourism strategy, together with Somerford Keynes PC, while Wiltshire Council was the most clearly dubious. There had been substantial support from North Wiltshire DC for an earlier proposal for an international rowing course, though the opportunity is now limited to a potential 1-1.5km lake which would provide a regional facility. Existing noisy watersports were not matters of major concern, though some considered the scope for new noisy watersports limited. Some interviewees expressed worries about the traffic and logistical problems of providing for major sporting events in the Water Park.

2.21 Cotswold DC has historically been more supportive of watersports in the Cotswold Water Park than have Wiltshire authorities. Nonetheless, there have been remarkably few proposals for new watersports facilities for many years. The reasons for this could not be resolved within the capacity of this study. The lack of effective demand could be due to an underlying weak demand, or lack of suitable lakes<sup>1</sup>, or due to resolvable constraints such as availability of large lakes (e.g. for sailing), or substandard access to the lakes available, or limitations in marketing to potential users. Whatever the explanation, the Cotswold Water Park is in practice not expanding the wide range of water-based activities which shaped the area as a recreation destination in the first place; nor are these becoming of regional or national importance. The stalling of commercial investment compared with earlier years suggests that watersports may need reinvigoration, or that the Water Park may have reached a significant turning point in this respect, which challenges objectives (i) and (ii). Discussions with watersports providers, who were outside our list of interviewees, may well

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<sup>1</sup> We understand that one sailing lake is too shallow and suffers vegetation problems, affecting membership.

be able to explain some of these findings, indicate if there is a latent demand for any watersports, and offer advice.

2.22 There is one exception to the finding of a lack of effective new demand. Angling is especially popular and existing lake angling facilities are generally heavily used. More than any other recreational after-use, angling has the capacity to take on additional lakes. Many angling clubs currently do not have their own lake. The latent demand for day tickets identified in the Master Plan appears to be continuing: angling clubs may be reluctant to offer these for fear of limiting pitch availability to members. Lake Pochard close to the Spine Road near South Cerney currently has the only purpose built match fishing site in the Water Park available on day tickets. Planned expansion of the facilities means that this site will soon be able to accommodate national angling competitions and aspires to the 'signature development' status of objective (ii). Progress is therefore being made towards the vision in the Master Plan (paragraph 4.21), which states "Angling is the predominant sporting activity in the CWP, but this could become even more prominent through the establishment of a dedicated angling centre to host training, competitions and events." There is an increasing demand for overnight accommodation to accompany angling, as well as continuing strong demand for one-day permits. The emphasis of demand is predominantly on carp fishing, and we are advised that two lakes offering trout fishing have recently ceased operations (leaving just one in the Water Park). Consideration would need to be given to minimising potential conflict with biodiversity and access interests if angling capacity expands.

2.23 Angling appears to be the only large scale, formalised recreational activity in the Cotswold Water Park which is currently capable of significant expansion, suggesting that the vision and objectives in the Master Plan have over-reached themselves in other respects. We conclude that, as drafted, objectives (i) and (ii) are not fit for purpose and should be modified to reflect the significance of angling alone. There was greater support for the expansion of low-key and dispersed forms of water-based recreation, such as canoeing, which are not associated with large concentrations of participants or spectators. There was also some feeling that the River Thames and its towpath were an under-used asset.

2.24 A cross-section of interviewees was asked about other types of leisure and recreational facilities they would support, in relation to objective (v). Some support was volunteered for canal restoration: this is not anticipated within the next five years and was therefore not pursued in this study. Others suggested the need for expanded wet-weather activities, which is mentioned but not developed in the Master Plan, and was beyond the study's capacity for investigation. The most frequently-stated preference was for low-key dispersed uses of the Water Park, mostly not directly water-related: walking, cycling, horse riding, picnicking and wildlife observation. The emphasis here was on keeping the area 'unspoilt' through low-intensity quiet recreation, avoiding built development and achieving compatibility with public access, biodiversity and green infrastructure. There was scope to re-use redundant farm buildings, though little farm diversification was so far evident. Taken with the encouragement of access (paragraphs 2.3-5 above) these amount to strong support for the integrated leisure network championed in the Master Plan (objective (v)), which remains fit for purpose.

2.25 Objective (vi) addresses the perception amongst some residents that the Water Park has produced certain facilities which are exclusively available to visitors and not to residents. Paragraph 4.23 of the Master Plan argues that exclusivity in after-use developments might be tackled by means which include more pay-and-play facilities rather than membership, favourable terms for residents, and programmes for non-members. Most of the local concern about equity of access to sports, leisure and recreational amenities was found to focus on public rights of way and access to the lakes themselves (see paragraph 2.3 above), rather than to built facilities (such as spas) or formalised recreation (such as sailing clubs). Our limited investigations suggest that the issue of equity of access for residents may have been significant in the past but appears less so now, though we understand the matter has been raised in one Neighbourhood Plan. An example was given to us of facilities at a holiday home complex being exclusive to occupants and the subject of complaint on this ground: when a proposal was subsequently made to open up the facilities to residents, local people apparently objected on grounds of additional traffic generation and the proposal was withdrawn. We were therefore surprised to see in the emerging Planning Policies from Cotswold DC continued reference to this issue: “The development of the area as a tourist destination has brought issues for some local residents, particularly where they have not been able to access the new facilities” (paragraph 8.35).

2.26 Developers of facilities may wish to operate as a good neighbour by providing favourable terms for residents which would not otherwise make commercial sense. However, that is not an objective peculiar to the Cotswold Water Park, and it does not appear to be a priority for local residents here. On public interest topics, planning authorities have the option to negotiate section 106 agreements on planning applications where necessary to address local planning issues: this can include making compensatory arrangements, for which residents can make suitable requests. The principle of developers’ care for their neighbours is worthwhile, but the status of such an objective in the Master Plan is becoming more questionable in view of the limited demand for it we identified. Objective (vi) is less fit for purpose than it was and could be dropped.

### Tourism Objectives

<u>Tourism objectives</u>	
i	Draw upon the existing character of the CWP and developments in the other core priorities to define the tourism offer of the CWP as a destination that can attract overnight visitors in its own right, with the primary visitor markets being sourced from the wide range of activities under consideration.
[ii]	Tailor tourism development to meet visitor demand resulting from the full range of activities under consideration and to encourage longer lengths of stay by broadening the range of activities in the CWP (e.g. General Sightseeing; Families; Wildlife Tourism; Sports Tourism; Arts and Cultural Tourism).]
[iii]	Establish other gateways across the CWP at strategically defined points to complement the existing Gateway Centre.]
iv	In consultation with community stakeholders in particular, seek to incorporate appropriate settlements (i.e. the main market towns and larger villages) as key visitor hubs within the CWP in order to make visitors feel welcome and encouraging them to utilise local facilities such as pubs, shops and accommodation.

2.27 The starting point for the analysis of views expressed is that tourism is under-developed in the Cotswold Water Park. There is not a coherent view of its economic

potential from existing operators, and organisationally the Cotswold Water Park is not well aligned with the relevant Destination Management Organisations (such as for the Cotswolds). Significant new tourism activity can be expected to result from the process of mineral extraction, lake creation and the new uses and opportunities which arise in, on and around those lakes. The Master Plan, drafted by tourism consultants at Scott Wilson, proposed the substantial expansion of tourism by developing an expanded 'offer', increasing the overnight accommodation available, and encouraging tourism-specific development. However, this is not a package to which the large majority of interviewees subscribed.

2.28 The increase proposed in overnight accommodation, proposed in objective (i), proved an awkward issue, despite the general appreciation of economic benefit brought by staying visitors and the likelihood of an increase in visitor numbers. Private sector interests saw providing additional accommodation as a natural response to taking advantage of the opportunities which the Cotswold Water Park has to offer. Most other interviewees considered that limited small scale schemes at the lower end of the market would be best (lodges, self-catering, caravan sites and bed & breakfast, including on farms), supporting the wildlife tourism and other low-key activities they favoured. Scepticism was expressed about the benefits of hotels, which were feared would become predominantly conference centres. Even Cotswold DC did not reinforce its commitment to tourism through clear support for additional overnight stays, advocating only a limited amount of high quality accommodation, a view shared by just one of the five Parish Councils interviewed. Most parishes had a negative view about the impact which tourism and any but the most limited new accommodation would have on their villages. Lechlade was the exception: already trying to tackle its significant traffic problem (through traffic calming and shared space proposals), the Town Council wanted to increase its available accommodation and the patronage of its shops. This would be linked to its current and possible future events based on the River Thames.

2.29 There is some ambivalence at the heart of local people's vision for the Cotswold Water Park, with reticence about providing the accommodation needed to turn opportunities into reality. Objective (i) seems to us fit for purpose and sufficiently carefully expressed to ensure that inappropriate accommodation is avoided. However, proponents of conforming new schemes may need to work hard to persuade doubtful local people of the benefits.

2.30 One of the most significant after uses of the land around lakes in the Cotswold Water Park is holiday homes. A range of businesses offer a variety of styles and prices of holiday homes at different lakes, with an emphasis on high value properties. The original intention was for these homes to provide holiday accommodation serving a large number of visitors as short-stay breaks, but in practice the majority have been sold to purchasers for their own exclusive use. (Others are rented out as intended, while some owners rent out their properties for short-stay visitors when they do not need them themselves.) Holiday home permissions have historically been accompanied by a condition limiting occupancy to 11 months of the year, to avoid permanent occupancy. However that condition has not always been effective: it is difficult to enforce and a challenge by a business just outside the Water Park in Wiltshire has been successful in having the condition lifted. Many holiday homes remain to be built under existing planning permissions: for example, just 320 of the

575 homes permitted on Lower Mill Estate have been completed so far, with new construction typically adding a dozen annually. All the Parish Council interviewees considered that no further permissions should be granted, and many considered there were more than enough holiday homes already. The local authorities did not wish to see further holiday homes built for sale, and even the private sector was cautious about further permissions on a large scale. The Master Plan only mentions holiday homes briefly, but our findings suggest that its emphasis on short stay and low cost tourist accommodation is the right focus.

2.31 Objective (iv) runs in parallel with objective (iv) of the Countryside, Communities and Settlements objective, this time from the perspective of tourists rather than residents. Giving more emphasis to market towns and large villages as centres from which visitors could explore the Water Park attracted more support than the accommodation objective. The private sector was now joined by Fairford PC, Lechlade Town Council and Cotswold DC in seeing opportunities for tying the visitor economy into settlements, perhaps as ‘gateway’ locations and with visitor centres. Others remained doubtful, even though one Parish Council did recognise that a major development nearby did sustain the local pub, and another tempered its annoyance at congestion with its fear of losing local trade.

2.32 Three factors appeared to underlie the local reticence about tourism. One was the feeling that the Cotswold Water Park was largely for visitors rather than residents, so why should residents wish to integrate? Another was that some areas had already taken their fair share of tourism developments. There was also the more pragmatic issue of traffic, which is reviewed below under Transport and Utilities Objectives. Like objective (i), objective (iv) appears fit for purpose, though the welcome it envisages for visitors is still through gritted teeth in some settlements.

### Agriculture Objectives

<u>Agriculture objectives</u>	
i	To supplement and support the agricultural sector, encourage suitable non-crop diversification of agricultural holdings to support the core priorities for development, particularly nature conservation, tourism and leisure.
ii	Encourage crop diversification into green energy crops, though this must be secured in areas that will not compromise biodiversity objectives.
[iii]	Support the WWT and other stakeholders in utilising livestock grazing as a natural mechanism for habitat management, particularly within the floodplain grazing zone.]
iv	Establish, through the production of local produce, a range of ‘CWP’ branded food products as a means of securing additional funding for projects within the CWP. The sales of this produce should directly and overtly be used to fund environmental conservation projects.

2.33 Questions relating to agriculture could only be asked of a limited number of interviewees (mainly the landowners, Natural England and FWAG) in the time available. Additional study should be carried out before relying on the findings for policy purposes.

2.34 The support for the agricultural sector envisaged in objective (i) comes mainly from the agricultural subsidy system. The tendency is for owners of smaller farms in particular just to want to farm and have little interest in non-crop diversification, whereas others may be more interested in new opportunities. Little diversification is understood to be

happening at present, though that is likely to change on the major Down Ampney estate run by Farmcare (a subsidiary of the Wellcome Trust) which views itself as a rural business rather than simply a farmer. There are steps which could be taken to encourage non-crop diversification, so the Master Plan objective (i) remains fit for purpose even though implementation may at best be patchy.

2.35 Diversification into green energy crops was a popular objective in 2008 but is now viewed with more ambivalence due to its impact on sustainable agriculture and biodiversity. In the Cotswold Water Park, FWAG is discouraging the use of maize as an energy crop as this adversely affects soil quality, soil erosion and run-off. We doubt that objective (ii) remains fit for purpose.

2.36 Enquiries suggested that the branding of products as coming from the Cotswold Water Park had not yet happened, though at least one major landowner had considered the idea. Product branding would follow more readily once the branding of the Water Park itself had made progress. This is discussed in paragraphs 2.9-12. Also relevant is the wider principle of tying economic activity in the Water Park to the generation of funds for recycling back into local environmental conservation projects. Natural England, RSPB and FWAG all cited the need for visitor pay-back schemes with this objective. Branded products could assist this, though other schemes could also be considered. These might include:

- an overnight stay charge, like one used in the Lake District National Park;
- a precept on Council Tax of the kind used by the Lea Valley Regional Park Authority or more generally in Business Improvement Districts (by which means tax raising could be applied to, say, recreational businesses benefitting from the Cotswold Water Park); or
- a local tax on services used predominantly by visitors, such as certain car parks.

Objective (iv) on product branding remains fit for purpose, though other actions would need to be taken first, and this one pursued later in the next five year period.

### Minerals Planning Objectives

#### Minerals Planning objectives

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|-----|---|
| i   | Ensure that considerations for the core priorities (countryside character, communities, settlements; biodiversity; sports, leisure, recreation; and tourism) of the CWP vision are fully integrated into the mineral planning process.                                    |
| ii  | Encourage future mineral extraction sites to become strategically integrated into the wider development objectives of the CWP as well as minerals requirements.   |
| iii | Develop a good practice guide for the restoration and after use of worked-out sites in order to inform developers and planning authorities as to the most appropriate restoration strategies that should be adopted and appropriate development opportunities that exist. |

2.37 Objectives (i) and (ii) are linked and considered together, both encouraging the tying of mineral operations to the wider interests of the Cotswold Water Park. Paragraphs 4.55-58 of the Master Plan set out a very progressive approach to explain the integration envisaged, key aspects of which are:

“The ideal position is for the mineral extraction sites that are granted permission for extraction by the Mineral Planning Authorities (MPAs) to be closely aligned to the wider development priorities for biodiversity, leisure, recreation, sport, and tourism;

and that this is conducted at a CWP-wide scale.... It is essential for the future of the CWP to ensure that the core priorities for development become a fundamental part of the MPA's considerations. This is not only because the minerals resources are finite and will cease in the future, but also the impact the extraction process has over time. A longer-term perspective needs to be taken that has regard to the opportunities that mineral extraction creates in order to secure benefits that will lead to a more sustainable future for the CWP after extraction.... A more integrated and strategic approach to the forward planning of mineral extraction sites is required with stakeholders, aggregate companies, the MPAs and the CWP stakeholders involved. The objective must be to agree to a set of shared principles designed to deliver mutual benefit. In this respect, these principles should seek to organise and programme mineral extraction to locations that offer the best opportunity to assist in realisation of the overall vision for the CWP....." (emphasis added).

2.38 Mineral working is the initial force which drives change in the landscape and character of the Cotswold Water Park, so the anticipated integration of interests is a proposal of the highest order. The implication of not pursuing or achieving this strategy would be the continued reliance on the random proposals of the market to promote sites around the Water Park, and seek to make the best of them from the perspective of other interests. Mineral working would pock-mark the area rather than follow a programme of locations for widest public benefit.

2.39 Mineral companies were somewhat doubtful about the integrated approach. This would have benefits of certainty for the companies, though the pattern of supply would be dictated to some extent by the demand for each type of material. Although there would be advantages, the companies also liked to be able to respond to circumstances when the time came for decision, and phasing would be commercially restrictive.

2.40 Gloucestershire County Council did not consider that the scale of mineral working proposed in the Water Park merited phased working across the landscape with co-operation amongst the landowners and mineral companies. Wiltshire Council highlighted the difficulties rather than the benefits of achieving a planned programme of mineral working for multiple benefits: it was site-specific points which affected outcomes and only if there was an infrastructure issue – a showstopper – could applications be resisted; in any event it would be difficult to get mineral companies to deliver the intended results to a timetable. This is a significant change of position from 2008, when the authorities had agreed to the integrated approach in the Master Plan. It had been put forward at that time because "This remains one of the key criticisms of the past approaches to mineral planning policy, despite active assurances by the MPAs that they have endeavoured to coordinate activities in more recent times" (paragraph 4.55).

2.41 There has clearly been a significant loss of ambition in local government since 2008 towards a landscape strategy and integrated planning. This attitude of viewing planning as a developer-led activity, over which local authorities have little control, we found to be deeply rooted in the authorities interviewed (as answers to other questions demonstrated). Making progress on objectives (i) and (ii) depends on councillors and staff in mineral planning authorities believing in the benefits obtainable, having the desire to make them

happen, and taking the trouble to ensure that they do. None of these pre-requisites currently appears to be available. The mineral companies appreciate this, and do not volunteer regulation upon themselves, but their responses were not dismissive and suggest that they remain amenable to providing wider public benefits if MPAs set about negotiating it carefully. Our own view is that this is currently beyond local government’s capability and that objectives (i) and (ii) and cannot be implemented without greater local planning authority commitment and financial resources. Achieving the objectives would require transformations in local planning authority attitudes and lateral thinking by staff to promote public benefits. Objectives (i) and (ii) remain entirely worthwhile, but after years of erosion of the planning service they are now significantly more remote from being achieved. Reversing this trend in the five years of the new Government seems most unlikely and their implementation will therefore have to be delayed – beyond the period for which this study is suggesting priorities. In the short term the objectives are therefore fit for purpose in that they would achieve the results intended, but not fit for purpose in terms of deliverability.

2.42 The Master Plan envisages in objective (iii) a much stronger set of restoration criteria to deliver against its core objectives, and proposes ‘good practice’ guidance to encapsulate this (explained in detail in paragraphs 4.61-62 of the Plan). This strategic approach attracted widespread support. Both mineral companies interviewed specifically agreed with this proposition, noting that this would help their relationship with landowners and address after-use issues efficiently. If a design strategy had mixed after-uses to fund nature conservation, that would be acceptable.

2.43 All parties asked, except the Mineral Planning Authorities, felt that more strategic guidance was needed on restoration/landscape and after-use. Most thought that planning permissions when granted should specify the after-use so that restoration could be designed for that from the outset within a wider strategy. Parish Councils did not consider that there were clear enough policies and guidance on after-uses. The MPAs did not have restoration strategies within the Cotswold Water Park. Gloucestershire County Council did not favour particular after-uses, leaving the initiative to the applicant and the preferences of Cotswold DC. Wiltshire Council’s approach was more restoration-led, with its Aggregate Minerals Site Allocations Local Plan 2013 setting out a template of acceptable after-uses at each site, and had member-level support for restoration to be managed strategically rather than piecemeal. We conclude that objective (iii) remains fit for purpose. It is important that the good practice guidance is a very practical document rather than a statement of objectives.

Hydrology Objectives

<u>Hydrology objectives</u>	
i	Continually reinforce the role of hydrology both as an enabler and potential constraint on future development in the CWP.
ii	Integrate the evidence provided by the Strategic Flood Risk Assessments being conducted for the MPAs as to the effect and influence that mineral extraction has on flood risk within the CWP.
iii	Investigate with stakeholders the problems of low river flows during dry periods and to identify methods of alleviation in order to ensure continued compliance with the EU Environment Liability Directive 2004 and the UK Water Framework Directive.
iv	Seek to protect and enhance the river corridors throughout the CWP for leisure, recreation, and biodiversity.

2.44 Almost all interviewees were asked for their views on what needed to be done to tackle flood risk and low water flow in the Cotswold Water Park. This briefly addressed all four hydrology objectives at once. The responses made abundantly clear how seriously hydrology is taken throughout the Cotswold Water Park. For Parish Councils the starting point was often the history of flooding in their areas and the serious problems this caused. Many parties had been closely involved in schemes to alleviate flooding and to understand the hydrological regime in their area. FWAG was most closely involved in the subject, primarily through its promotion of a Water Integrated Local Delivery framework (WILD project) in partnership with the Cotswold Water Park Trust and others. This aimed to co-ordinate numerous plans for direct use at the Parish level, and particularly emphasised matters such as ditch management and the removal of soil bunds from areas of mineral working in flood risk zones.

2.45 Difficulties clearly remained, such as:

- the limited resources available to the Environment Agency to address the problems;
- the diversion of ground water flows by clay-lined mineral workings; and
- understanding the complexity of the hydrological regime, particularly to the east of the A419 where substantial mineral working is anticipated.

There were also linked difficulties, notably to:

- water quality and the problem of leak-prone aging foul water infrastructure; and
- housing development and impediments to water infiltration.

Low water flow was only mentioned infrequently.

2.46 The great attention being given to hydrological issues suggests that the objectives remain fit for purpose and are being applied.

### Planning Objectives

<u>Planning objectives</u>	
i	Create a single planning framework across the CWP in the form of an Area Action Plan that reflects a systematic, co-ordinated and collective approach to development control that is to be adopted by the respective local planning authorities.
ii	Prior to the AAP being adopted, and in the interest of moving forward, secure a common commitment to the thrust of the Vision and Implementation Plan in the current LDF policy development as the strategic direction and context for the CWP.

2.47 A single planning framework across the Cotswold Water Park proposed in objective (i) would require the integration of powers currently held by Cotswold District Council and Wiltshire Council as local planning authorities and Gloucestershire County Council and Wiltshire Council as mineral planning authorities. Swindon Borough Council, West Oxfordshire District Council and Oxfordshire County Council might also be involved depending on where the boundaries to the affected area were drawn.

2.48 Almost all interviewees were asked whether a co-ordinated planning approach across the Cotswold Water Park mattered, and all agreed that it did, usually emphasising its importance. The supporters included local authorities, though their intended means of co-ordination was in one case limited to compliance with the Duty to Co-operate under the

Localism Act 2011 and to co-operation on cross-boundary planning applications. Most responses indicated enthusiasm for a much more meaningful level of integration of policy and planning practice throughout the Water Park under a single regime. The benefits of a unified approach were widely appreciated, with consistency of approach and the opportunity to plan the whole area in a unified way strongly valued. The identity of the area would also be enhanced. Many wanted the co-ordination to extend beyond planning, to highways (e.g. the Spine Road crosses the county boundary a number of times and the speed limit changes on each occasion, and see also paragraph 2.7 above) and policing (one interviewee complained that they were on the boundary of three forces 'who don't talk to each other').

2.49 The level of co-ordination of planning across local authority boundaries at present is around the minimum practicable. The best co-operation had probably been the measure of agreement between county mineral planning policies. However, this had worked less well regarding after-uses (as Wiltshire wished to be more restrictive than the Gloucestershire authorities), and there were reports of inconsistencies in implementation having affected other matters too such as the operation of settlement protection boundaries. For the most part it was clear that neither officers nor members met their counterparts in other authorities other than very infrequently. The quarterly meetings which the Cotswold Water Park Trust had formerly held, to which all authorities sent representatives, had been the primary regular meeting point between authorities on Water Park issues. Parish Councils near the county boundary were well aware of the weaknesses of local authority cross-boundary working, to the extent that a group of them established a Parish partnership to improve communication (Kempsford, Castle Eaton, Marston Masey, Latton and Down Ampney plus RAF Fairford). (This followed on from a short-lived Cotswold Water Park Trust 'Parish Panel' initiative.) One outcome from the partnership had been a call for the local planning authorities to provide a strategic planning policy across the area. This was seen as critical: it was of great concern to the eastern parishes of the Water Park that each mineral extraction site is viewed in isolation and that no-one appeared to have an overall view.

2.50 The Master Plan proposed an Area Action Plan as a formal planning document to co-ordinate planning across the authorities. This is a high level document which must pass through significant public consultation and public examination before it can be adopted. The statutory requirements inevitably take time which, coupled with the need for substantial agreement between authorities at the outset, would postpone implementation for at least three years. The Brief therefore invites investigation of the option of a Supplementary Planning Document (SPD) as an alternative statutory document for providing cross-boundary co-ordinated planning. This is more easily consulted upon and adopted but has correspondingly less status in the hierarchy of plans and policies.

2.51 The scope for using an SPD was discussed with selected interviewees. This was presented as a vehicle not just for cross-boundary co-ordinated planning but as the Water Park-wide policy base which could be used to present a landscape strategy, biodiversity strategy and other parts of an integrated plan for the area. Both the mineral companies could see the benefit of this approach and felt that it could be achieved. Other parties supporting the idea included the RSPB, Natural England and Parish Councils. Wiltshire Council and Cotswold District Council in effect recognised the need for closer cross-

boundary working and left open the possibility of an SPD, though Gloucestershire County Council was not keen to pursue this mechanism. With the commitments to the Master Plan in adopted or emerging statutory planning documents (see paragraphs 2.53-56 below), there is some surprise that the authorities endorsement of a formal planning basis for co-operation in the Water Park was not expressed to us more strongly.

2.52 The need for co-ordinated planning in the Cotswold Water Park is widely agreed as necessary and the case for the level of integration proposed in the Master Plan is soundly based. There is substantial support for this, though in local government not to the level of engagement proposed, and a wide appreciation that this co-operation is not happening at present. A Supplementary Planning Document would be much easier to achieve than an Area Action Plan, though weaker in its powers. Policy objective (i), adjusted for an SPD, is fit for purpose.

2.53 Objective (ii) is one of the few in the Master Plan on which tangible progress has already been made. Notably in Wiltshire Council, development plan documents have been adopted which clearly reflect the vision of the Master Plan. The *Wiltshire and Swindon Minerals Core Strategy 2006-2026*, adopted in June 2009 has ‘collaborative working’ as one of its five strategic objectives, part of which is “To address long-term supply issues and environmental concerns, the preparation of joint Local Development Documents will be advocated, where necessary, particularly in the Cotswold Water Park / Upper Thames Valley.” Policy MCS 5 ‘Collaborative Working in the Upper Thames Valley’ then states

“The Councils will pursue and implement collaborative working arrangements to secure a shared vision, objectives and policy framework for minerals development (including restoration and afteruse) in the Cotswold Water Park / Upper Thames Valley, with the following Planning Authorities:

- Gloucestershire County Council;
- Cotswold District Council.”

The Plan also seeks to meet the aims and objectives of the Cotswold Water Park Biodiversity Action Plan (paragraph 5.98).

2.54 The *Wiltshire Core Strategy*, adopted January 2015, includes a specific Core Policy 54 on the ‘Cotswold Water Park’ which formally delivers on the commitment in objective (ii) of the Master Plan’s Planning Objectives. This begins:

“In the Cotswold Water Park, proposals for outdoor or water-based sports, leisure and recreation based development will be supported where they help transform the area to an informal recreation and leisure resource for Wiltshire residents and visitors in line with the key objectives of the Cotswold Water Park Vision and Implementation Plan.”

2.55 In Gloucestershire, the County Council’s *Minerals Local Plan Site Options and Draft Policy Framework* consultation document of June 2014 has a Proposed Strategic Aim for the Cotswold Water Park:

“The County Council will seek to agree with stakeholders and keep under review a collaborative planning mechanism for achieving a landscape scale, holistic approach

to determining appropriate reclamation plans and afteruses for mineral workings in the Cotswolds Water Park.”

2.56 Cotswold DC consulted on a *Development Strategy and Site Allocations* in January 2015, which includes the statement at footnote 24 that on 2 February 2012 “the Council endorses the Cotswold Water Park Strategic Review and Implementation Plan (Master Plan) and uses it to help guide and inform policy development and decision-making.” The Council is currently consulting on a draft policy document, and in 2016 the two documents will be merged in revised form for submission for Examination as the Cotswold Local Plan. The current draft consultation policy document includes a Policy on ‘Post-mineral extraction after use proposals in the Cotswold Water Park (Upper Thames Clay Vales)’, which updates previous policy under the former Local Plan regime. This policy covers a wider area than the designated Cotswold Water Park and its immediate surroundings, and is therefore less precise locationally in its application.

2.57 Objective (ii) remains fit for purpose. Some progress has been made towards achieving the objective, particularly on paper, but more remains to be achieved both in policy and especially in practice.

### Transport and Utilities Objectives

<u>Transport and Utilities objectives</u>	
[i]	In association with the MPAs, encourage sustainable transportation of minerals out of the CWP in order to limit the impact of HGV traffic on the local road network.]
ii	Identify and devise road improvement schemes that reduce the adverse impact of HGV traffic, whilst also retaining the character of the road network for the longer term benefits of the area.
[iii]	Establish a Local Transport Plan for the CWP in order to better integrate public transport connections to the CWP and around the CWP. This should incorporate other potential initiatives that could be used by leisure visitors.]
[iv]	As part of the Transport Plan, devise a Green Infrastructure Network (GIN) that complements and integrates the values of the core components of the Vision (namely providing sustainable links throughout the CWP, encouraging local access to the countryside, and providing access to leisure routes between key assets) and reduces car borne movements on local roads.]
v	Ensure sufficient consideration is given to the additional pressures that could be placed on the utilities infrastructure through development (especially tourism development), including requirements to upgrade and improve the infrastructure as required.
[vi]	In the interests of sustainability and to match the wider ethos of the CWP, encourage the construction of development that surpasses sustainability policy guidelines in relation to design and resource utilisation.]

2.58 Like the Master Plan, our interviews aimed to distinguish separately the transport issues associated with mineral working and with visitors. Currently, most Parish Councils considered the existing road network inadequate to support the existing level of traffic, let alone any increase in that. Traffic volume was particularly acutely felt in Fairford and Lechlade. West of the A419, the Spine Road was felt to work well and serve the activities which had sprung up adjacent to it, though the narrow lanes forming the rest of the network in that area were inadequate for the traffic experienced. In the central section of the Water Park, with relatively little recreational traffic, the mineral lorries were considered the main problem: there were direct differences of view between residents who reported difficulties of passage and damage to verges and hedgerows, and the two Mineral Planning

Authorities who both reported that traffic surveys had shown the road network here to be quite sufficient for the mineral traffic.

2.59 Objective (ii) expresses the principal conundrum: how to improve the road network to alleviate HGV impact while protecting the character of the rural lanes. The solution to these was unclear: a minority of interviewees proposed road widening or construction to connect the villages better or to alleviate mineral traffic, but the majority were more worried by the change in character of the area which would be brought by improved roads and the likelihood of extra traffic and extra development, whether mineral or recreational. The greater likelihood appears to be the continuation of current practice, with small scale road improvements to resolve local access difficulties for mineral workings, funded by the mineral companies, but no new major road investment – for which there is no source of funds in any event. Looking ahead, only Fairford PC reported that it was following Lechlade in investigating the investment needed in roads to enable tourism growth (paragraph 2.28 above). Broadly there was some resignation to the circumstances:

- the modest local road network did provide some protection from additional traffic;
- commuting was sometimes a major source of the problem; and
- gravel restoration in the central area would often be to agriculture rather than lakes, so the problem of recreational traffic would be less intense than west of the A419.

2.60 The scope for minor road improvements will remain topical for years to come and require continual reassessment. Objective (ii) therefore remains fit for purpose. Road improvements are unlikely to involve a major upgrade between the A419 and Fairford. Mineral traffic in the central area should generally be directed west to the A419 rather than north to the A417. With the decline in sand and gravel output from the Cotswold Water Park from around 2 million tonnes p.a. ten years ago to around 1mpta now, the scale of the challenge to the local road system has been reduced. However, additional material for blending with Cotswold gravel may be imported and there is a likelihood of additional HGV movements in future to fill some of the excavated areas in the central section of the Water Park. Effective control over lorry routes and their capacities will therefore continue to be a pressing local issue.

2.61 Objective (v) highlights utilities infrastructure and the impact of new built development upon it. Infrastructure proved controversial. This centred on maintaining water quality and on the adequacy of water-related facilities to secure waste water removal and treatment, noted under Hydrology Objectives above. However, there were other concerns expressed to us, especially by Parish Councils. Particular inadequacies were considered to be in:

- bus services;
- high speed broadband;
- medical facilities and schools in the area around Fairford.

Other than water-related infrastructure limitations, the principal cause of capacity limitations in infrastructure was neither mineral working nor visitors but house building sanctioned by the Government against the will of Cotswold DC, notably around Fairford where a 30% increase in the number of houses was scheduled in just five years. Recent planning appeals had been allowed despite known infrastructure capacity limitations, as the obligation to supply land for housing took precedence. None of these problems are by any

means unique to the Cotswold Water Park, though that does not make them any less keenly felt or less in need of attention. Visitor-related development was broadly expected to supply its own infrastructure requirements, such as sewage treatment and road improvements. On occasion this could improve the facilities for everyone. However, some new facilities, such as sewage treatment, might well serve only the new development, leaving the difficulties in nearby settlements to languish. There is a strong case for new tourism-related development in the Water Park to contribute to wider existing needs for infrastructure improvement rather than only tackle the direct increment. This is because a proportion of tourism will be through pre-existing establishments where infrastructure deficiencies will be made worse (such as bed & breakfasts and farm tourism). The need for objective (v) clearly remains and is fit for purpose.

### Aerodrome Safeguarding Objectives

<u>Aerodrome Safeguarding objectives</u>	
i	Through careful consideration of proposals, ensure that development of the CWP will not increase birdstrike risk to air traffic or otherwise compromise air traffic safety.
[ii	Continue to liaise with the relevant stakeholders (MoD Defence Estates Unit, Kemble Airfield, RSPB, Wiltshire Wildlife Trust, MPAs, LAs) over the risks to aerodrome safeguarding posed by potential development through the existing Birdstrike Technical Working Party.

2.62 There was insufficient time to ask questions of most interviewees about the risk of birdstrike identified in objective (i), but the topic is clearly of considerable importance in shaping the scope for mineral working and the nature of the restoration which follows it in the central area of the Cotswold Water Park around RAF Fairford<sup>2</sup>. The key obligation is to avoid the creation of significant areas of open water, so that large birds do not visit and create a risk of aircraft crashes by being sucked into jet engines. The mineral deposits in the area are generally shallower than already-worked areas to the west and east, though the water table remains very high. This creates various tensions. A larger area of land would be required to obtain a specified amount of gravel, increasing the area at risk of becoming a lake. Shallow deposits may assist restoration to wetland rather than open water, with greater control over the bird species attracted. Furthermore, infilling to allow land to be restored to agriculture (often likely to be a preference of landowners in the area) is likely to be more feasible. However, that infilling could disturb the pattern of water flows in the area, possibly inhibiting the excavation of gravel in the first place. It would also increase traffic flows on the minor roads in the area. In all probability it would also prolong the cycle of operations due to the shortage of suitable inert filling materials available in relation to the scale of gravel extraction anticipated. The already key consideration of hydrology is therefore made more complex by the risk of birdstrike. A full appreciation of water flows through the Cotswold Water Park has not yet been achieved despite considerable study. Objective (i) remains of considerable importance and is likely to be very carefully assessed whenever mineral working is proposed east of the A419. It therefore remains fit for purpose.

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<sup>2</sup> Other airfields that may have an interest in the Cotswold Water Park are Kemble to the west and Brize Norton to the north-east.

## Conclusion

2.63 The large majority of the objectives in the Master Plan remain fit for purpose. Details are set out in the text. To some extent this reflects their broad-brush nature and the scope for 'doing more' even where progress has been made – such as on biodiversity enhancement and the incorporation of suitable statements into some development plans. However, in many cases the objectives remain as important now as in 2008, given the continuing pressures on the Cotswold Water Park and the limited progress with the objectives to date. Objectives involving a strategic local government input usually face more challenges now than seven years ago, due to loss of capacity and reduced ambition. As a result, the achievement of some objectives will need to be postponed, or occasionally dropped for the near future.

### **3. ACHIEVING THE GREATEST IMPACTS ON MASTER PLAN OBJECTIVES**

3.1 The Brief seeks advice on which parts of the Master Plan are most susceptible to delivery and where initial focus could be brought to achieve the greatest impact. Although many of the objectives of the Master Plan remain fit for purpose, the accompanying Implementation Plan from 2008 is out of date and needs revision. We suggest that such a revision particularly develops the priorities identified below. The enquiries which led to conclusions on the fitness for purpose of the Master Plan's many objectives (in section 2) also inform this issue.

3.2 Achieving the greatest impact in the shortest period is largely about selecting the easiest objectives on which to make progress, but without simply choosing the most minor objectives (which would not offer the 'greatest impact'). Actions which can lever additional benefits will also score highly. All the objectives proposed for priority action attracted a reasonable to high level of support from interviewees and, more significantly, encountered few powerful opponents.

3.3 We consider there are seven priority objectives from the Master Plan on which effort should be focused to achieve the greatest possible impact in a short period. These are listed below and then explained. The first four are key items of strategic planning work which we view as critical to creating the fundamental targets and benefits around which other activities can coalesce and which can be promoted:

- (a) a landscape strategy for the Cotswold Water Park, (Countryside, Communities and Settlements Objective (i));
- (b) a landscape-scale biodiversity strategy for the Cotswold Water Park, (Biodiversity Objective (i));
- (c) an access and public rights of way strategy for the Cotswold Water Park (the integrated leisure infrastructure network), (Countryside, Communities and Settlements Objective (iii) and Sport, Leisure and Recreation Objective (v)); and
- (d) a mineral site restoration and after-use good practice guide for the Cotswold Water Park, (Minerals Planning Objective (iii));
- (e) maintaining a commitment to the thrust of the Master Plan in development plans, (Planning Objective (ii));
- (f) a consistent branding strategy to be incorporated into the marketing of the Water Park, (part of Countryside, Communities and Settlements Objective (iv)); and
- (g) strengthening the role of the Nature Conservation Forum, (Biodiversity Objective (vii)).

3.4 The first four priority objectives are items of work which would ideally be commissioned by a partnership of local organisations including the Cotswold Water Park Trust and the local authorities in the area, plus particular interest groups appropriate to each topic. In the short term, not a great deal would be lost if the local authorities did not take part in the commissioning process: these are items of work that might well attract local sponsorship or charitable funding and be carried out at advantageous cost by consultants expert in their fields. There would clearly be merit if the items of work were integrated, with the outputs being compatible. If that cannot be achieved for financial or logistical reasons, then the sequencing of the commissions would need to reflect an order of

priorities. The landscape strategy would come first: it is the local geology, hydrogeology and landscape character which fundamentally shape the future of the area for mineral working and the landscape which can follow afterwards. Biodiversity and access corridors can then dovetail with the landscape objectives. Conceptually, there could be advantage in the landscape, biodiversity and access strategies being combined into a single study, but this runs the risk of creating a document that is too lengthy, complex and overwhelming – it could in effect become the integrated and phased strategy proposed in Minerals Planning Objective (i) which interviewees and especially local authorities found too challenging.

3.5 The four documents from implementing our first four suggested priority objectives would in effect lay down the physical outcomes on the ground which the Cotswold Water Park is seeking to achieve. They should each go through a consultation phase to attract buy-in from residents, landowners, mineral companies, developers of after-uses, interest groups and others. The process of report commissioning should therefore be tied clearly to wider purposes of public engagement and building support. The final reports should amount to a blueprint for the Cotswold Water Park's evolution over the next 15-20 years. Each document might well be able to become a Supplementary Planning Document, locking in a measure of local authority commitment to them.

3.6 Priority objective (e) builds on local authorities' existing commitment to incorporating the thrust of the Master Plan in their development plans. This should continue as a key priority. Section 2 of this report argued that most of the objectives of the Master Plan remain fit for purpose, so there is little reason for authorities to consider that the Master Plan is time-expired. Retaining a full commitment to the democratically agreed Master Plan is an important starting point for the future engagement of local authorities in the implementation phase. This commitment will now need to be incorporated into the local authorities' Local Plans (the latest expression of development plans now that the terminology of Local Development Frameworks has been dropped). The emerging Local Plans in Cotswold DC and Gloucestershire CC provide an opportunity to press for the continuation of the commitment. Full engagement with the policies emerging in these plans is also vital in its own right: such plans are only reviewed periodically, and the opportunity should not be missed to seek the best possible policies now for the Cotswold Water Park. This is a priority task for the next year, while the process is live.

3.7 Priority objective (f) would provide a basis for marketing the Cotswold Water Park, which has been conspicuously missing. There is a priority need to articulate what is special about the area and to identify a brand for promotion. Branding depends first on having something clear to market (the reality must not fall short of the image). Then the businesses, organisations and ideally local authorities with a stake in the area should agree to use the brand within their own activities and marketing. The process of deciding what the brand should be for use across the Water Park will bring people together to discuss the options. This itself will begin a helpful process of cohesion and identification of shared purpose across the area. The chosen branding approach can then be promoted extensively, both locally (e.g. in signage, logos and online) and more widely as an integral part of marketing the Cotswold Water Park as a whole.

3.8 Finally, a simple and inexpensive opportunity in priority objective (g) is to strengthen the role of the Cotswold Water Park's Nature Conservation Forum (NCF) in promoting the enhancement of biodiversity in the area. Substantial benefits have been achieved in implementing the local Biodiversity Action Plan, and more can be done. This is a topic around which much agreement can be found and progress made relatively quickly. The NCF is an established vehicle for taking action and should be given renewed vigour by aiming to attract more participants and greater commitment to action. This should quickly bring knock-on benefits for the Water Park and its brand image. The Nature Conservation Forum could also be expected to be closely involved with promoting the biodiversity strategy (priority objective (b) above).

#### **4. PROMOTING A SUPPLEMENTARY PLANNING DOCUMENT**

4.1 This section responds to the part of the Brief which asks us to ‘suggest which parts of the Master Plan have the content which could form the basis for a workable Supplementary Planning Document for adoption by planning authorities in support of Local Plan/mineral plan policies on development in the Water Park. Suggest the format of such an SPD and how it might be used to support emerging neighbourhood plans.’ In practice we have taken a slightly wider view of the opportunities.

##### The scope of Supplementary Planning Documents

4.2 The legal requirements with which Supplementary Planning Documents must comply are set out in the *Town and Country Planning (Local Planning) (England) Regulations 2012*. Under these Regulations, a Supplementary Planning Document is limited to any document prepared by a local planning authority (individually or in cooperation with one or more other local planning authorities), which contains statements regarding “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in” the local plan. The definition now precludes an SPD from containing statements “regarding the development and use of land which a local planning authority wishes to encourage” and from “the allocation of sites for a particular type of development or use”. Local planning authorities wishing to do those things will need to include their proposals in their Local Plan. Nonetheless, an SPD is likely to be acceptable if the policies themselves are in the Local Plan and the SPD is limited to working out the details of existing policies. This offers hope for SPD in the Cotswold Water Park to have a meaningful role.

4.3 Features of an SPD are that:

- The policies in it must not conflict with the adopted development plan;
- It must contain a reasoned justification of the policies contained in it;
- It is a ‘local development document’ which may need to be accompanied by a Strategic Environmental Assessment;
- The preparation process includes two stages of public consultation.

4.4 Paragraph 153 of the National Planning Policy Framework is clear that SPD should not be used unless necessary: “Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.” Taken together with the Regulations, SPD is confined to a modest role which should not be overstepped.

##### Purposes and practicalities of SPD in the Cotswold Water Park

4.5 We consider here briefly three purposes for which SPD might be promoted:

- a unified cross-boundary planning regime for the Cotswold Water Park;
- application of the strategies and good practice guide priorities in section 3 above;
- zoning of land uses, initially in the Cotswold DC area.

4.6 The primary aspiration for a revised planning regime in the Cotswold Water Park is for a unified cross-boundary planning system for forward planning and development management across the Water Park area. This would have considerable support from many of those we interviewed. Indeed the two developers of after-uses independently and unprompted advocated National Park status for the Cotswold Water Park (which would give the area its own separate local planning authority). The benefits of a unified planning regime are clearly viewed by some parties as outweighing any disadvantages of 'intervention'. Unfortunately, it is clear from the legislation that SPD could not perform the function of providing a new planning regime in the area. That would best be achieved by a Joint Local Plan or, possibly, an Area Action Plan. From the perspective of this project, a unified planning approach to the Cotswold Water Park must therefore be left for another occasion.

4.7 Apart from a unified planning regime for the Cotswold Water Park, the main strategic objectives in the Master Plan which continue to be fit for purpose are the Water Park-wide landscape strategy, biodiversity strategy and access strategy prioritised in paragraph 3.3 above, supplemented by a mineral site restoration and after-use good practice guide similarly prioritised. The legislation appears to allow the preparation of SPD for these purposes, provided there is a parent policy to underpin them in the Local Plan itself. The four documents could be provided as separate SPDs or as a single combined SPD. The evidence from interviews is that there is a greater likelihood of these being accepted individually than combined. We therefore propose the preparation of four SPDs.

4.8 In practice there is a significant procedural difficulty in that the strategies and good practice guidance will be applicable Water Park-wide, i.e. on both sides of the County boundary, and will therefore need to pass through administrative processes tied to parent policies in local plans on both sides. The three strategies would be subsidiary to the Local Plan and the good practice guide subsidiary to the Minerals Local Plan in each county. Opportunities to influence the plans in Cotswold DC and Gloucestershire CC are imminent, whereas Wiltshire Council has a recently adopted suite of Plans. Implementation of the SPDs in the Wiltshire area is therefore likely to be delayed.

4.9 To make the best of the circumstances, we recommend that the Cotswold Water Park Trust moves swiftly to prepare the three strategies and the good practice guide using such partnerships as it can assemble and such finance as it can raise. At the same time it should press Cotswold DC and Gloucestershire CC to include in their Local Plans suitable parent policies for future SPDs. Until such time as these authorities and Wiltshire Council are able and willing to adopt the three strategies and the good practice guide as SPDs, the Trust should press all councils as appropriate to take planning decisions in line with the advice in those documents. The documents would be material considerations and, in the absence of competing advice in the authorities' own plans, should be capable of carrying significant weight in planning decisions.

4.10 A final option for SPD is to carry forward the Supplementary Planning Guidance on the Cotswold Water Park issued by Cotswold DC in November 1999. The principal feature of this SPG is the identification of zones around the Water Park in which different categories of after-use would be allowed or resisted. There were Quiet Zones; Low Intensity Recreation

Zones; Sport, Recreation and Tourism Zones; and a Zone for Agriculture and Forestry. This is problematic for various reasons. First, the allocation of land to particular uses would probably fall foul of the limitations since 2012 on what SPD is allowed to do (paragraph 4.2 above). Second, the Master Plan does not discuss a zoning system for post-mineral land uses in the Water Park, and the matter is therefore technically outside the scope of the project and of the commitments which local planning authorities have made. Third, identifying a zonal use for each lake and its surrounding area would require significant resources to justify, so the SPD would be a significant undertaking. Fourth, Cotswold DC is moving away from a zoning approach to a proposed criteria-based approach, and would have to be persuaded to change its mind. The evidence from interviews was that there were still a few parties who felt this to be the best way to plan the Water Park (though they lamented the breaches of the zoning arrangements which Cotswold DC had allowed), but that most respondents no longer wished to rely on zoning. There were alternate fears that a criteria-based approach would be even more easily overturned by developers than the zoning system (which we share), though that would be the opposite of Cotswold DC's intentions. We must recommend that zoning arrangements are not pursued through an SPD.

#### SPD boundaries

4.11 The Cotswold Water Park covers only a fraction of the area of each of the local authorities in whose areas it lies (e.g. just 6% of Cotswold District). This means that any Supplementary Planning Document will apply only to part of an authority's area and therefore that this area will have to be specified accurately on an Ordnance Survey base. SPD policies need to apply to a clearly defined area. What should that area be? There can be little doubt that the Designated Site Boundary of the existing formal Cotswold Water Park is unfit for this purpose. It is based on Parish Council boundaries yet excludes certain parishes which clearly have significant areas within the commonly understood Water Park area, such as Marston Meysey. The gravel bearing area extends somewhat beyond the confines of the designated area, and there are some worked areas beyond it too (such as to the north-east of Lechlade and towards Siddington); conversely, parts of some parishes rise above the Thames valley floodplain (e.g. south of Cricklade). For practical purposes, the Master Plan applied itself to what it called the 'functional boundary' of the area – a loosely drawn line extending at almost all points somewhat beyond the designated area. The Master Plan advocated a definition of the boundary which removed anomalies and related to the activities and facilities encompassed now and in the future. It put forward some proposals (which do not appear to have been pursued).

4.12 Revision of the boundary to the Cotswold Water Park for SPD purposes is a matter to which the Cotswold Water Park Trust must inevitably return. We share the Master Plan's broad perspective on this: the area to be encompassed must cover the whole landscape to which the proposed strategies and policies are intended to apply. These are based primarily on mineral working and the after-uses of the land affected. Geology should therefore play a significant part in the choice of boundary, perhaps extended where associated landscape, biodiversity or access considerations take the central interests of the Water Park slightly further afield. Other than such limited circumstances, the boundary should extend no further outwards than necessary: that would dilute its purpose, confuse the application of

policy, and unnecessarily draw in parties which need not be involved (such as Parish Councils with land only in the [unnecessarily] extended areas).

4.13 The need for a boundary for SPD purposes should be distinguished from other purposes. For brand and marketing purposes the precise boundary is unlikely to be particularly important and could even be left vague. However, for a number of purposes specific to the Water Park a clear and justified boundary would be valuable, such as to ensure the concentration of funds earmarked for the Cotswold Water Park into priority locations, and to ensure the engagement of all communities likely to be affected. The approach proposed to be adopted by Cotswold DC in its emerging Planning Policies, scheduled for public consultation imminently, is unhelpful to the Cotswold Water Park in terms of boundaries and the application of policy. The new draft Policy SP5 for the area is now proposed to apply to the whole of the 'Upper Thames Clay Vales', which is based on a Landscape Character Area identified by Natural England and far wider than the commonly understood Cotswold Water Park (especially into Wiltshire and Oxfordshire). In effect the Water Park would be diluted as an entity, and policy apply across a broad area instead of a closely defined one. This will make the policies more ubiquitous and the Water Park less special. Under the new policies, whether a proposal needs a lake-based location – arguably a defining feature of the Cotswold Water Park – would no longer be relevant, which risks diminishing the Water Park's identity.

#### Support for Neighbourhood Plans

4.14 Neighbourhood Plans did not exist in 2008 when the Master Plan was drafted. Rapid progress in legislation, policy development and practice around the country has transformed the opportunities available to local organisations like Parish Councils to specify their own development priorities and to control (or at least influence) what kind of development is carried, where and how. Neighbourhood Plans are in a position to specify how mineral working should be carried out in relation to settlements and landscapes, where footpaths and cycle tracks should be put in, where development around lakes should go, design criteria for those new developments, and the nature of access to lakes after mineral working. Even if the future sites for mineral workings are unclear, Neighbourhood Plans can take the initiative to shape the after-uses and the landscape design after working.

4.15 All the Parish and Town Councils we interviewed were actively engaged in local issues. In many cases the Cotswold Water Park was shaping those issues. The preparation of Neighbourhood Plans (in four of the Councils) provided an opportunity actively to tackle problems and derive benefits. However we were often told that the Councils felt weak in the face of wider issues shaping the Water Park (particularly mineral working). The Cotswold Park Master Plan is a vision and had been found too vague for neighbourhood planning purposes. The Supplementary Planning Documents we propose would significantly change this, tipping the balance of power in favour of local benefits, by giving practical expression – teeth in effect – to the vision. Whereas individual Parish Councils currently lack an overview of the Cotswold Water Park and how they fit into a wider scheme of possibilities, the SPDs would provide that framework for local proposals. Neighbourhood Plans would be able to take the proposed patterns of landscape, biodiversity and access improvements as a starting point, and expand upon these.

4.16 We anticipate that the Cotswold Water Park Trust will wish to encourage Parish Councils to prepare Neighbourhood Plans, taking advantage of the SPDs. In effect the Trust could show Parish Councils how improvements could be made to local areas following mineral working. We would expect the Trust to work more closely with Parish Councils generally and with Rural Community Councils, while those Councils preparing Neighbourhood Plans would approach the Trust for advice.

## 5. RECOMMENDATIONS

5.1 Section 2 of this report has argued that much of the Cotswold Water Park Master Plan remains fit for purpose. It sets out a vision of the opportunities for greatly improving the area as a destination especially in environmental and recreational terms, giving it an improved sense of place. It was prepared professionally with an evidence base and with the benefit of public consultation. The local planning authorities in the area have endorsed it and have referred to it in their statutory planning documents. The Master Plan still represents the best available foundation for decision making on development in the Water Park, so it is vital that its value is not lost or undermined. **We recommend that local planning authorities continue to endorse the Master Plan and implement its Planning Objective that they make a commitment to the document in their own Local Plans as the strategic direction and context for the Cotswold Water Park.**

5.2 There is some awareness of the existence of the Master Plan amongst parties involved in the Cotswold Water Park but strikingly little knowledge of its content. **We recommend that a four-page summary of the Master Plan should be prepared and widely circulated as a priority, to begin the process of reinvigorating public, private and institutional interest in the future of the Water Park.**

5.3 Many of the objectives of the Master Plan are not being implemented at present and opportunities are being lost to achieve higher quality mineral workings, better planned after-uses and more green infrastructure subsequently. Residents are missing out, particularly on access around restored lakes, and the pattern of after-uses is becoming more random for want of a strategic approach which fits all interests together. **We recommend that three linked strategies are prepared which clarify the changes needed on the ground to achieve the intentions of the Master Plan, all including maps on an Ordnance Survey base to show what can be achieved. They should be professionally prepared with thorough public consultation to promote collective support. These would be:**

- a landscape strategy;
- a landscape-scale biodiversity strategy;
- an access and public rights of way strategy to create an integrated leisure infrastructure network.

5.4 Each new planning application for mineral working is treated on its own merits as a one-off. There is no information for developers and planning authorities on the most appropriate restoration strategies that should be adopted and appropriate after-use and development opportunities that exist. Operations are not always tailored to appropriate individual or mixed after-uses, so improved restoration criteria would help to achieve the objectives of the Master Plan more effectively. **We recommend that a mineral site restoration and after-use good practice guide should be prepared. This should be a very practical document.**

5.5 The Cotswold Water Park should be an area of optimism about the benefits which change can bring at the landscape scale. Change is led by the minerals industry and rounded off by the after-uses which follow, with both sectors committed to showcasing their achievements. In this area effective town and country planning is not simply about

regulation, but about arranging development to achieve good things for everyone's benefit. Strategies for improvement which all parties can work towards offer added value, not burdens upon developers. Local planning authorities will be able to achieve the greatest possible benefits if the three strategies and the good practice guide noted above are fully implemented. This will best be achieved if these documents are given significant added weight by becoming statutory planning documents. **We recommend that the three strategies and the good practice guide are adopted as Supplementary Planning Documents, the good practice guidance by Gloucestershire County Council and Wiltshire Council as mineral planning authorities and the strategies by Cotswold District Council and Wiltshire Council as local planning authorities. If part of the designated Cotswold Water Park continues to lie within Swindon Borough Council's area, this authority should also adopt these four documents as SPD where this is merited.**

5.6 Cotswold District Council is preparing a Local Plan and Gloucestershire County Council is preparing a Minerals Local Plan. These are important opportunities to include both planning policies sympathetic to the Cotswold Water Park and statements of intent to prepare Supplementary Planning Documents. As Local Plans are prepared only periodically, these opportunities should not be missed. Wiltshire Council has a suite of adopted statutory planning policy documents, though these will need revision in due course. **We recommend that objectives from the Cotswold Water Park Master Plan be incorporated into policies in the emerging Local Plans in Cotswold DC and Gloucestershire CC as a matter of urgency.**

5.7 The Cotswold Water Park could have a much improved sense of place. What it is, what it does and what it aspires to be have not been articulated clearly and communicated to different audiences. There is limited 'buy-in' from residents, while visitors can focus on their specific interests rather than the offer of the Water Park as a whole. The best forum for the interested parties to discuss and agree a marketing strategy for the Water Park is likely to be the Cotswold Water Park Trust, though it appears not to have been used for this purpose. Bringing people together to discuss the options will itself begin a helpful process of cohesion and identification of shared purpose across the area, and this will need to be supported by additional funding. **We recommend that a marketing strategy for the Cotswold Water Park be initiated by the Cotswold Water Park Trust and involve a wide range of local sectors and interests in its preparation. Part of this should include the identification of a brand for the area which can be used across the area and by all parties in their own activities and promotion. Short and easily understandable promotional materials should be included.**

5.8 The Cotswold Water Park Trust has great enthusiasm but very limited resources to pursue the objectives of the Master Plan. At the same time, major public sector cutbacks have reduced the capacity of local government and other state institutions to provide resources for new initiatives. Users of facilities, private businesses, charitable bodies, grant giving funds and public donations are therefore likely to be called upon to secure a greater proportion of the funding which is required to achieve beneficial change. Those likely to benefit most from the improvements and greater attractiveness of the Water Park will hopefully be particularly inclined to support the endeavour. **We recommend that the Cotswold Water Park Trust should lead a fundraising strategy for achieving wider benefit**

**across the area, identifying projects which need funding and working with potential contributors for mutual benefit. This should include sponsorship and visitor pay-back schemes. Part of the strategy should aim to raise the Trust's own core funding to improve its capacity to achieve its charitable objectives.**

5.9 Neighbourhood Plans give local organisations distinctly greater influence over change that happens in their areas. This can be harnessed to help achieve the objectives of the Master Plan and give local organisations like Parish and Town Councils real opportunities to improve their areas. This will be especially beneficial once the proposed landscape, biodiversity and access strategies and the minerals restoration good practice guide are in place. Local initiatives can then more readily fall into place as contributing to wider public objectives in the Water Park. Parish and Town Councils can collectively carry significant weight in their local authorities: the Cotswold Water Park Trust is in a position both to assist them and to benefit from their support if additional funding is found for this work. **We recommend that the Cotswold Water Park Trust encourages Parish and Town Councils within its area to prepare Neighbourhood Plans if they have not already done so, and maintains an improved level of communication with them and with the Rural Community Councils through meetings and newsletters.**

5.10 The boundaries of the designated Cotswold Water Park do not properly encompass the area actually or potentially affected by mineral workings and its effects. This will have to be remedied for the preparation of Supplementary Planning Documents, and would have additional benefits for engaging those most affected by Water Park activities. **We recommend that the Cotswold Water Park Trust reviews the boundary of the designated area for land use planning and other purposes.**

5.11 The Cotswold Water Park Trust will be able to achieve most of the identified objectives only through the assistance and actions of others, including local planning authorities for some of the most significant tasks. The Trust should therefore adapt as necessary so that it can exert the influence required. The Trust has a good image and its greater involvement with people and organisations is likely to be welcomed. More joint working and maximum co-operation with regulatory bodies are desirable. This change is key to tackling the big issues facing the Cotswold Water Park, though it will require additional funding. **We recommend that the Cotswold Water Park Trust expands its level of engagement locally with all sectors, and particularly its focus on strategic issues, to build up its capacity to achieve the major objectives challenging the Water Park.**

## **APPENDIX 1 LIST OF INTERVIEWEES**

Twenty separate interviews were held between 28<sup>th</sup> August and 17<sup>th</sup> September 2015, with each lasting at least one hour, as follows:

<b>Interviewee</b>	<b>Organisation</b>	<b>Interviewer</b>
Christine Gore	Cotswold District Council	Richard Bate, Matthew Millett
Sophia Price	Cotswold District Council	Richard Bate
CLlr Sue Jepson (& Sophia Price)	Cotswold District Council	Richard Bate
Georgina Clampitt-Dix, Jason Day	Wiltshire Council	Richard Bate, Jennifer Bate
CLlr Toby Sturgis	Wiltshire Council	Richard Bate
Kevin Phillips, Robin Drake	Gloucestershire County Council	Richard Bate, Jennifer Bate
Peter Holmes	Natural England	Richard Bate, Jennifer Bate
Steve Trotter	Lechlade Town Council	Richard Bate, Jennifer Bate
Barry Fenby, Richard Harrington, Malcolm Cudler	Fairford Town Council	Richard Bate, Jennifer Bate
Teresa Griffin, Alison Ward, Mark Strange, Sue Griffin	Kempsford Parish Council	Richard Bate, Jennifer Bate
Roger Sleeman, Sarah Powell	Somerford Keynes Parish Council	Richard Bate, Jennifer Bate
Dave Wingrove	Ashton Keynes Parish Council	Richard Bate
Andy Duncan	Hanson Quarry Products	Richard Bate
Peter Andrew	Hills Quarry Products	Richard Bate, Jennifer Bate
Richard Skeates	Bidwells (for Farmcare)	Richard Bate, Jennifer Bate
Nicholas Ford	Ernest Cook Trust	Richard Bate, Jennifer Bate
Will Vickery	Habitat First Group, Lower Mill Estate	Richard Bate
Jim Ridgway	Lake Pochard	Richard Bate
Phil Sheldrake	Royal Society for the Protection of Birds	Richard Bate
Jenny Phelps	Farming and Wildlife Advisory Group	Richard Bate, Jennifer Bate