



Martin Perks
Cotswold District Council
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By email only to: planning@cotswold.gov.uk

27 October 2020

Dear Martin

APPLICATION NO: 20/02934/FUL

DESCRIPTION: Erection of new model stable yard, etc. Temporary siting of 1 mobile home. Use of associated land for keeping and training horses

LOCATION: Naunton Downs Golf Club Ltd, Naunton, Cheltenham, Gloucestershire GL54 3AE

The above planning application has been brought to the attention of the Cotswolds Conservation Board ('the Board'). The proposed development would be located within the Cotswolds National Landscape.¹

The proposed development introduces a significant amount of built development into a location that currently has no built development. For example, the Board estimates that the footprint of the proposed buildings and structures alone would be approximately 4,770m² (i.e. nearly 0.5ha).

This significant scale of development has the potential to interrupt the sense of seclusion that is a feature of the High Wold Valley Landscape Character Type. As such, it also has the potential to adversely affect the tranquillity of the Cotswolds National Landscape, which is one of the area's 'special qualities'. Furthermore, the development would introduce a significant degree of lighting into an area that currently has no such lighting. As such, it has the potential to adversely affect the dark skies of the National Landscape, which are another of the area's special qualities

Given the points outlined above, the Board is surprised that the local planning authority (LPA) has concluded in its Environmental Impact Assessment (EIA) screening opinion that the development would have no significant environmental effects and that it will not require the submission of an EIA.

Regardless of the EIA screening opinion, the Board considers that the development potentially constitutes 'major development' in the context of paragraph 172 of the National Planning Policy Framework (NPPF). If the LPA considers that it is major development, in this context, then there should be a presumption against granting planning permission.

Given the scale of the proposed development and its potential adverse effects on the Cotswolds National Landscape, the Board recommends that the applicant should be required to provide photomontages of the proposed development from key viewpoints in Year 1 and Year 5 in both summer and winter conditions.

Cotswolds Conservation Board

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

In reaching its planning decision, the LPA has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.² The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) give explicit consideration to the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)), particularly, in this instance, with regards to Landscape Character Type (LCT) 8 (High Wold Valley) and LCT 7 (High Wold);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 8 ([link](#)) and LCT 7 ([link](#)), including Sections 8.9 and 7.10 respectively.
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to the Position Statement on 'The Keeping of Horses and Ponies' ([link](#)) and the associated land management advice leaflet on the same topic ([link](#)).

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
Planning & Landscape Lead
john.mills@cotswoldsaonb.org.uk | 07808 391227

NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) Section 85 of the Countryside and Rights of Way Act 2000. ([Link](#)).