



Martin Perks  
Cotswold District Council  
Trinity Road  
Cirencester GL7 1PX

By email only to: [martin.perks@publicagroup.uk](mailto:martin.perks@publicagroup.uk) and [planning@cotswold.gov.uk](mailto:planning@cotswold.gov.uk)

11 June 2021

Dear Martin,

**APPLICATION NO:** 21/01699/FUL

**DESCRIPTION:** Formation of new gallops.

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

The above planning application, which is for a development that would be located within the Cotswolds National Landscape<sup>1</sup>, has been brought to the attention of the Cotswolds Conservation Board.

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.<sup>2</sup> 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) take into account 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 8 (High Wold Valley);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 8 ([link](#)), including Section 8.9;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to the Keeping of Horses and Ponies Position Statement ([link](#)) and the associated leaflet on 'The keeping of horses and ponies in the Cotswolds AONB' ([link](#)), as well as the Tranquillity Position Statement ([link](#)).

We acknowledge that equestrian facilities are quite common in the Cotswolds National Landscape and that these facilities make a valuable contribution to the local economy. However, such facilities also have the potential to have an adverse impact on the character and quality of the area's special landscape. We consider this to be the case for the proposed gallops, particularly with regards to the southern section of the gallops that extend beyond the golf club.

For this reason (and for the additional reasons outlined below) we object to the proposed development and recommend that planning permission should be refused.

### Landscape Character

The southern section of the gallops would extend into the Upper Windrush Valley Landscape Character Area, which forms part of the High Wold Landscape Character Type (LCT) – LCT 8. The High

#### **Cotswolds Conservation Board**

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

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](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**  
*Vice Chair:*  
**Rebecca Charley**

Wold Valleys are sheltered and visually contained, giving a general impression of intimacy. They are sensitive to developments that might interrupt the sense of seclusion within them.

The introduction of the gallops (including the associated paraphernalia and usage) would introduce an incongruous and visually intrusive feature, which would not be compatible with the intimate and secluded setting of the valley. This adverse impact on landscape character should be given great weight in the planning decision.

The river valleys of the Cotswolds National Landscape are one of the area's 'special qualities'. In other words, they are a key attribute on which the priorities for the area's conservation, enhancement and management should be based. Given that the proposed gallops would have an adverse impact on landscape character, as outlined above, it follows that they would also have an adverse impact on this special quality of the Cotswolds National Landscape.

### Tranquillity

The introduction of the gallops into the Upper Windrush Valleys would also have an adverse impact on the relative tranquillity of the area, which is another of the special qualities of the Cotswolds National Landscape.

As outlined in the Board's Tranquillity Position Statement, '*tranquillity can be defined as a state of calm and quietude associated with peace, experience in places with mainly natural features and / or historic character, free from man-made noise and other aural and visual disturbance*'. The gallops and their associated use would reduce this sense of calm, quietude and peace and would increase visual and aural disturbance.

Given that the gallops would adversely affect the tranquillity of the area they would also not be compatible with Policy CE4 of the Cotswolds AONB Management Plan 2018-2023, which specifies that proposals should (i) avoid and (ii) minimise aural and visual disturbance

Although tranquillity is a special quality of the Cotswolds National Landscape in its own right, it is also an integral component of the area's landscape character. As such, the adverse impact on tranquillity should be given great weight in the planning decision.

### Visual impact

The southern section of the gallops would directly overlap with one named, recreational route (the Diamond Way) and would be in very close proximity to another named, recreational route (the Windrush Way). The applicant's own Landscape and Visual Impact Assessment (LVIA) indicates that the Zone of Theoretical Visibility (ZTV) extends along a 900m long section of the Windrush Way.

This section of the gallops would also be in close proximity to several other Public Rights of Way (PROW), including Naunton Footpath 11, Naunton Footpath 12 and Naunton Bridleway 18. Whilst these PROW overlap with the Windrush Way and / or the Diamond Way, they also have sections, in close proximity to the proposed gallops, that are separate from the named routes. In addition, the gallops would also be in close proximity to an area of publically-accessible access land at the south end of the field.

Overall, the incongruous feature of the gallops would be clearly seen from multiple, publically accessible locations, including a substantial length of the popular Windrush Way. The gallops would therefore have a significant adverse visual impact. As such, it would not be compatible with Policy CE1 of the Cotswolds AONB Management Plan 2018-2023, which states that proposals should ensure that views and visual amenity are conserved and enhanced.

### Quiet recreation

Another 'special quality' of the Cotswolds National Landscape is 'an accessible landscape for quiet recreation' (N.B. Underlining added for emphasis). Given the adverse impacts outlined above, it follows that the gallops would also have an adverse impact on this special quality.

The proposed overlap of the gallops with the Diamond Way / Naunton Bridleway 8 would have a particularly adverse impact on this 'quiet recreation'.

### Biodiversity

The Defra MAGIC map identifies that the field in which the southern section of the gallops would be located is lowland calcareous grassland priority habitat.

Appendix 8 of the Cotswolds AONB Management Plan 2018-2023 identifies that lowland calcareous grassland is a particular priority for the Cotswolds National Landscape. This is because lowland calcareous habitat is characteristic of the Cotswolds and because the Cotswolds is a stronghold for this habitat.

This site forms an important 'stepping stone' in the ecological network of lowland calcareous grassland across the Cotswolds National Landscape. This network, in turn, plays an important role in supporting the internationally important limestone grasslands, which are another of the special qualities of the Cotswolds National Landscape.

We acknowledge the applicant's assertion that the grassland in the northern section of the field, in which the gallops would be located, is not as high quality as the grassland in the rest of the field. However, this does not provide an excuse for permitting a development (i.e. the gallops) that would have a further detrimental impact on this precious habitat.

Instead, the emphasis should be on conserving and *enhancing* this habitat and establishing a coherent and resilient ecological network, as specified in Policy CE7 of the Cotswolds AONB Management Plan 2018-2023. The gallops would not be compatible with this policy.

### Conditions if Cotswold District Council is minded to permit the proposed development

Without prejudice, if Cotswold District Council is minded to permit the proposed development we recommend that the gallops should only be permitted to extend as far south as the boundary of the golf club and not into the Upper Windrush Valleys Landscape Character Area.

If you have any queries regarding our comments, please do not hesitate to get in touch.

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](mailto: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](#)).