16/00383/FUL Lilleybrook Golf Club 313 Cirencester Road Charlton Kings Cheltenham Gloucestershire GL53 8EG.

Engineering works to re-profile and re-contour the existing practice facility to create a mini 9-hole course by importing 100,000 cubic metres of inert fill material.

The Cotswolds Conservation Board wishes to raise an **objection**. Many of the issues covered in the current application for 100,000 cubic metres of inert fill material were covered in the last application (15/00328/FUL).

The Board considers the importation of 100,000 cubic metres of inert landfill material into the nationally protected AONB to be a form of "major development" and therefore paragraphs 115 and 116 of the NPPF are relevant in this case. Accordingly the Board considers the proposal does not meet the exceptional circumstances tests of Paragraph 116. The landscaping proposals, at the scale of 100,000 cubic metres, seems to be a figure derived at based on a waste operation rather than what is actually needed (if at all) to re-profile the golf course? The Board continues to question whether the predominant purpose of the development actually involves profiting from waste disposal rather than engineering for the benefit of the golf course. The Board also questions, given the location in the "sensitive" AONB landscape (as stated within the EIA guidelines), whether this proposal has been screened for the need for an EIA. The proposal will result in a substantial level of HGV movements which will erode the rural road network and result in the importation of waste into the AONB. Although in landscape terms the scheme offers restoration of the landscape, the short term harm and wider impacts of this development on the environment of the AONB, have not been adequately assessed.

Concerns in respect of this form of development specific to golf courses were originally raised in a letter from the DCLG to Chief Planning Officers in 2009 (see attached together with the Board's Waste Position Statement). The Council are therefore requested to fully consider these issues before forming a decision on this application.