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By email only to: [gemma.smith@wychavon.gov.uk](mailto:gemma.smith@wychavon.gov.uk)

18 October 2022

Dear Gemma,

**APPLICATION NO:** W/22/00685/FUL

**DESCRIPTION:** Change of use of field for clay pigeon shooting.

**LOCATION:** Land at (OS 1160 3742) Farncombe Drive, Broadway

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the additional information submitted by the applicant for this proposed development that would be located within the Cotswolds National Landscape<sup>1</sup>.

For the reasons outlined below, we wish to maintain our **holding objection** and request the applicant's further response.

In our previous response dated 21 April 2022 we raised a holding objection on the basis that the applicant had not, in our view, adequately assessed the impact of the proposed development in line with requirements of Policy 23 of the South Worcestershire Development Plan (SWDP), Policy CE4 of the Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 and paragraph 176 of the NPPF, particularly in relation to potential impacts upon the tranquillity of the National Landscape. We welcome the submission of a Noise Assessment by the applicant (Sharps Redmore, June 2022) in this regard.

The Board's Tranquillity Position Statement recommends that proposals which have the potential to impact on the tranquillity of the AONB accord with Policy CE4 of the AONB Management Plan. This policy states that proposals that are likely to impact on the tranquillity of the AONB should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance. Measures should also be taken to enhance the tranquillity of the AONB by i) removing and ii) reducing existing sources of noise pollution and other aural and visual disturbance.

In our response we specifically requested that any Noise Impact Assessment should demonstrate that the proposal would not adversely impact the tranquillity of the National Landscape, particularly that enjoyed by walkers on public rights of way including the Cotswold Way National Trail and Public Rights of Way 557(c), 618(c) and 650(c). However, none of these locations are either mentioned or assessed within the submitted assessment which only took noise measurements from a test shoot at one location at High Street, Broadway, which is located on the opposite side of the A44 (Fish Hill) from the shoot. Whilst the assessment comments that the noise of the shoot in this location was to a large extent masked by traffic on Fish Hill, this would probably not be the case for walkers on the paths mentioned above which all lie to the east and north of the A44 and in particular, for those

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

*Chairman:*  
**Brendan McCarthy**

*Vice Chair:*  
**Rebecca Charley**

walking footpath 557(C) which passes a short distance from the shoot location. Figure 4 of the assessment shows modelled shooting noise levels across an area which the assessment states is *“representative of objections received in relation to the planning applications”*. We note it does not include the Cotswold Way National Trail as it runs from the A44 northeast to Buckle Street. Notwithstanding this, Figure 4 shows LAmax levels in excess of the 60dB(A) target level outlined in Section 2 of the assessment across an area covering stretches of footpaths 557(c), 618(c) and 650(c). Therefore, it appears likely that walkers would experience noise levels in excess of this target level in these locations. As such, we continue to hold the view that the application does not accord with Policy CE4 of the AONB Management Plan, and by extension Policy 23 of the SWDP.

We recognise that the Tranquillity Position Statement recommends that relevant stakeholders should assess the potential impacts of planning proposals on tranquillity, particularly with regards to noise. We note that Worcestershire Regulatory Services (Nuisance) commented on 19 July 2022 concluding that the *“submitted noise assessment is acceptable, representative of expected shooting activities and concludes that shooting noise should not adversely impact the nearest identified sensitive receptor(s)”*. We would welcome the WRS team’s assessment of the potential impacts on receptors along the public rights of way mentioned above.

In our initial consultation response we also requested an Ecological Assessment to demonstrate that there would be no undue disturbance to wildlife from the increased shooting activity on site. From a review of the online planning register this has not been provided to date.

Without prejudice, if the Council is minded to approve this application, we would support the Regulatory Services team’s request of conditioning the Noise Management Plan detailed in Table 3 of the submitted noise assessment.

Please don’t hesitate to contact me if you wish to discuss this response further.

Yours sincerely,



Simon Joyce

Planning Officer

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## 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.  
[www.legislation.gov.uk/ukpga/2000/37/section/85](http://www.legislation.gov.uk/ukpga/2000/37/section/85)
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
  - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023  
[www.cotswoldsaonb.org.uk/management-plan](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)