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By email only to: Isobella.Howell@teewkesbury.gov.uk

8 March 2022

Dear Issy,

APPLICATION NO: 21/01544/FUL

DESCRIPTION: Provision of cricket pitch for ancillary use as part of Dumbleton Cricket Club

LOCATION: Dumbleton Cricket Club, Dairy Lane, Dumbleton, Evesham, Gloucestershire, WR11 7TP

The above planning application, which is for a development that would be located within the Cotswolds National Landscape¹, 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.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) 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 Types (LCT) 19, Unwooded Vale, which it lies within and LCT 1, Escarpment Outlier, which it lies adjacent to;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCTs 19 ([link](#)), in particular Section 19.11, and 1 ([link](#)), in particular Section 1.14;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#)); and
- Cotswolds Conservation Board Position Statements ([link](#)).

The Board notes the Council's pre-application response (ref. 21/00057/PRE, May 2021), within which the Case Officer stated that there was no 'in principle' objection to the proposal from the Council's Landscape or Conservation Officers and concluded that 'based upon the information provided, officers are of the view that the principle of the provision of a cricket pitch within the grounds of Dumbleton Hall, for ancillary use as part of the existing cricket club, would be acceptable in planning and heritage asset terms.' The Board also acknowledges the fact that temporary cricket pitches of this nature are found in the landscaped grounds of other country houses and it is also noted that the physical elements of the scheme are temporary, that no buildings or permanent structures are proposed and that in particular, the electric fence is removable.

Whilst the site is not part of a designated Registered Park and Garden, it is landscaped parkland that forms part of the setting of the Grade II* listed Dumbleton Hall and Grade I listed Church of St Peter

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

and lies within a Conservation Area and forms part of an 'important view' identified within the Conservation Area appraisal. Section 19.11 of the Cotswolds AONB Landscape Strategy and Guidelines concerns changes in land use and management within historic parks and gardens and cites the 'weakening of the integrity of designed landscapes, parks and gardens' and 'loss of or damage to elements of designed landscapes, parks and gardens' as potential adverse landscape implications of development proposals.

Bearing this advice in mind, the Board recommends that, without prejudice, if the Council is minded to approve this application, appropriately worded planning conditions are imposed to strictly limit the amount of time the electric fence is erected, to ensure that the portable scoreboard is removed from the area when not in use and also that the erection of future further additional buildings and structures, either permanent or temporary, on the site is prevented in the interest of conserving and enhancing the natural beauty of the AONB.

The Board also supports the advice given by the Council's Conservation Officer at pre-application stage that officers should satisfy themselves that adequate parking, changing and other facilities can be provided on matchdays at the main cricket club in light of many claims to the contrary from residents and Dumbleton Parish Council which have been submitted during the consultation process for this application.

DEFRA's Magic Map application shows the site as comprising 'Wood-pasture and Parkland' Priority Habitat; this is one of the priority habitats for the Cotswolds National Landscape, listed in Appendix 8 of the Cotswolds AONB Management Plan 2018-2023. The conservation and enhancement of such priority habitats is a key element in conserving and enhancing the natural beauty of the National Landscape. Policy CE7 of the AONB Management Plan states that proposals that are likely to impact on the biodiversity of the Cotswolds AONB should provide a significant net-gain in biodiversity, particularly with regard to the species and habitats listed in Appendix 8. The Board notes that the applicant has provided no biodiversity assessment as part of this application and, in line with the advice of the Council's Planning Ecological Adviser, it is recommended that the applicant provides an Ecological Appraisal of the site and the proposal along with provisions for a significant net gain in biodiversity.

The Board therefore **objects** to the application in its current form and requests that the applicant addresses the concerns in respect of biodiversity and priority habitat impact outlined above before the application is determined.

Please do not 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
- 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
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2