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

21 April 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

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 (LCT) 2 Escarpment which the site lies within and LCT 7 High Wold, which lies within close proximity to the site;
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 2 ([link](#)) and LCT 7 ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)), in particular the Tranquillity Position Statement ([link](#)).

Policy 23 of the South Worcestershire Development Plan (SWDP) states that development that would have a detrimental impact on the natural beauty of an AONB will not be permitted (part A), that any development proposal within an AONB must conserve and enhance the special qualities of the landscape (part B) and that development proposals should have regard to the most up-to-date approved AONB Management Plans (part C).

Relative tranquillity is recognised as one of the factors that contributes to natural beauty. Natural England's 'Guidance for assessing landscapes for designation as National Park or Areas of Outstanding Natural Beauty in England' ([link](#)) lists relative tranquillity at Table 3 and Appendix 1. The Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023, which is a material

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

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

consideration in planning decisions, states that tranquillity is one of the 'special qualities' of the Cotswolds National Landscape, along with the Cotswold escarpment (upon which the application site is located) and the high wold (which lies in close proximity to the application site) areas of the National Landscape. In other words, these are features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard them.

The Board's Tranquillity Position Statement referenced above 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.

The Tranquillity Position Statement also recommends that Local Planning Authorities give great weight to conserving and enhancing the tranquillity of the AONB and that relevant stakeholders should assess the potential impacts of planning proposals on tranquillity, particularly with regards to noise.

The Board acknowledges that the applicant currently offers clay pigeon shooting on this site for up to 28 days a year through permitted development rights. However, we are concerned at the potential intensification of this activity proposed by this application and its potential impact upon tranquillity of this part of the National Landscape, particularly due to the intermittent nature of the shots being fired in an otherwise largely tranquil environment. In their covering letter, the applicant describes how up to 6 participants would take up to 50 shots each over the course of an hour's clay pigeon shoot. In theory, this could result in up to 300 shots being fired over the course of an hour, or on average, up to one shot fired every 12 seconds for an unspecified, but unrestricted number of sessions between 10am and 5pm Monday to Saturday throughout the year.

Given the proposed intensification of shooting activity, we are also concerned that the applicant has provided no information on how the shoot would operate within the site, where the equipment would be located, where participants would stand and in which direction shots would be fired. We also request that the applicant provides a Noise Impact Assessment to demonstrate that the proposal would not adversely impact the tranquillity of the National Landscape, particularly that enjoyed by local residents and walkers on public rights of way including the Cotswold Way National Trail and Public Rights of Way 557(c), 618(c) and 650(c) and also an Ecological Assessment to demonstrate that there would be no undue disturbance to wildlife.

In light of the above, the Board wishes to raise a **holding objection** on the basis that the applicant has not adequately assessed the impact of the proposed development and as such has not demonstrated that the proposal accords with SWDP23, Policy CE4 of the Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 and paragraph 176 of the NPPF.

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)