

OBJECTION TO PLANNING APPLICATION 25/02583/FUL

Application Reference: 25/02583/FUL

Proposal: Wetland enhancement works upstream of Sherborne Broadwater to reconnect river with floodplain, manage silt, preserve open water, improve biodiversity, and mitigate flood risk.

Objector: Sherborne Parish Council

Address: c/o Brook Cottage, Sherborne, Cheltenham GL54 3DU

Date: 21st November 2025

Sherborne Parish Council objects to Planning Application 25/02583/FUL and respectfully request that Cotswold District Council refuses permission for the proposed development.

Sherborne Parish Council would in principle support a scheme which establishes new wetlands, enhances biodiversity, mitigates flood risk, and minimises silt deposition within the Sherborne Broadwaters. However, the Parish Council feels that this application is significantly flawed, and the scheme would fail to achieve its stated objectives.

The Parish Council has major reservations about the proposed location for this project and its efficacy. The scheme is situated within a Grade II Registered Park and Garden (Sherborne House), and within the Sherborne Conservation Area, which make the site wholly unsuitable for this development. Our concerns also extend beyond the proposed location, as we question the effectiveness of the scheme. Specifically, we are not convinced that it will result in a meaningful reduction in the continued accumulation of silt within the Broadwaters, nor are we confident that it will succeed in preserving the currently diminished areas of open water. The proposals will certainly not result in the re-establishment of extensive areas of open water, nor the restoration of the Broadwaters to their historic pre-eminence within the Sherborne Park landscape.

The Parish Council objects to the application for the following reasons:

- i. The proposed wetland scheme is inappropriately located within a Grade II Registered Park and Garden and a Conservation Area, and we contend that the proposals will cause significant and irreversible harm to these important heritage assets.
- ii. The scheme will have significant adverse visual impacts upon local residents, public rights of way and listed buildings, and there will be the loss of historic views which define the character and identity of Sherborne Village.
- iii. We believe that the proposed silt reduction and flood risk mitigation measures are unlikely to achieve their objectives and may on the contrary lead to conflicting outcomes.
- iv. There is no long-term management plan provided with the scheme to ensure that the desired outcomes remain effective into the future.

- v. The scheme is non-compliant with a number of local and national planning policies.
- vi. The application documents are deficient and are not supported by thorough and accurate environmental and heritage assessments.
- vii. The scheme does not have the support of the majority of people within the local community.
- viii. There has been no meaningful pre-application consultation with the community or other stakeholders, in order to seek opinion and to work with the community in shaping a scheme for the benefit of all.
- ix. The scheme fails to offer a holistic approach to tackle the primary source of silt entering Sherborne Brook, nor the restoration of open water areas within the Broadwaters through the effective removal of silt and vegetation by mechanical means.
- x. The scheme takes no account of domestic and commercial water supply services which are known by the Applicant to cross the proposed areas of excavation.

In developing its response, the Parish Council has:

- i. Commissioned an independent Hydrological Review Report to assess the scheme's effectiveness and the validity of the submitted Flood Risk Analysis.
- ii. Consulted with qualified and respected landscape historians.
- iii. Distributed a questionnaire to all parish households to obtain and accurately reflect the views of the village community.
- iv. Examined other comments and objections relating to the planning application as published on Cotswold District Council's planning website.
- v. Carefully reviewed statutory consultee submissions as published on Cotswold District Council's planning website.

Details of the Parish Council's concerns, and the evidence gathered in support of its objection are presented below in Sections 1 - 4. Several appendices containing supplementary information are also referenced. These appendices will be submitted to the District Council as individual documents and include the following:

- Appendix 1 – Community Questionnaire
- Appendix 2 – Hydrological Review Report
- Appendix 3 – Statement of Community Heritage Significance
- Appendix 4 - District Council Consultation
- Appendix 5 – Minutes of Meeting, 9 July 2025

In addition, the Parish Council offers recommendations for alternative proposals as outlined in Section 5 below.

1. DEFICIENCIES IN THE APPLICATION DOCUMENTS

1.1 Heritage Assessment

- 1.1.1 The Parish Council is concerned that the Heritage Assessment and the Design and Access Statement (DAS) provide very little substantive evidence about the history, provenance, and heritage value of the Old Park (within the Grade II Registered Park and Garden), and especially the two lakes known as the Broadwaters. The Parish Council considers that the application documents are ambiguous and fail to adequately recognise the age and cultural heritage significance of both the Old Park and the Broadwaters.
- 1.1.2 The DAS claims the lakes were *"likely constructed in the late 1700's / early 1800's" for "amenity purposes"*, whereas the Heritage Assessment suggests that the Upper and Lower Pools [the Broadwaters] were formed in circa 1820. The Heritage Assessment also states that *"there is no evidence to indicate that the pools were deliberately excavated, instead utilising the natural contours of the land, it has been suggested the pools were intended to act as reservoirs."* The Assessment goes on to suggest that *"The intended benefactors of these reservoirs were three mills depicted on the 1815 Two-Inch Ordnance Survey map, which were located downstream to the east near the village of Windrush"*.
- 1.1.3 The Parish Council challenges these assertions, maintaining that strong topographical and LIDAR evidence supports the view that the Broadwaters were deliberately excavated and constructed. Moreover, the Council finds it highly implausible that the lakes served as reservoirs for mills located approximately **three miles away** on the River Windrush, a separate river system. Historical research by local individuals, including input from two eminent landscape historians, leads the Parish Council to suggest that the Broadwaters were constructed as ornamental lakes in the style of the English Landscape Movement during the mid to late 18th century. Indeed, the National Trust's own Curator, Dr Alden Gregory, referred to *"an 18th century formal landscape of lakes and cascades"* in the National Trust's 'Statement of Significance' document, dated April 2013 (see paragraph 1.1.5 below). Historic England also suggest that the Broadwaters might date from the 18th century. In the official list entry for the 'Sherborne House' Registered Park and Garden, Historic England state that the date when the Sherborne Brook was broadened into a lake is not known, but they go on to say that *'Isaac Taylor's county map of 1777 appears to show the lake.'*
- 1.1.4 The Heritage Assessment references a Conservation Management Plan (CMP) prepared by Chris Gallagher et al. in 2023. The Parish Council was aware of this document's existence and had been informed by the National Trust that the CMP would be shared with both the Parish Council and the local community. However, two years after its completion, the CMP has not been published and, more importantly, has not been shared with Historic England or the Gardens Trust. It is concerning that the National Trust cites the CMP within the Heritage Assessment without making the document available for examination by the public or statutory consultees.
- 1.1.5 The Heritage Assessment fails to reference an earlier National Trust assessment entitled 'The Sherborne Park Estate: Statement of Significance' written by Dr Alden Gregory (a

former National Trust Curator) and dated April 2013. This document includes the following important statement in respect of the Grade II Registered Park & Garden: *“The designed landscapes that surround village invest it with its special character. Views into and out of the village, especially those that take in the Sherborne Brook - an 18th century formal landscape of lakes and cascades - should be considered especially significant.”* It would appear that the National Trust is essentially ignoring its own assessment.

- 1.1.6 Within the final paragraph of the Design and Access Statement, the Applicant concludes that the proposed scheme *“will have a beneficial long-term effect on the heritage of the site”*. It states that *“at present the Upper and Lower Pools in the Registered Park and Garden have a large accumulation of sediment within them, which is resulting in the growth of wet scrub, young trees and reeds, and is narrowing the pools. The proposed river channel restoration will have the beneficial effect of limiting the extent of this detrimental sedimentation and will contribute towards keeping the pools clear of encroaching vegetation, thus maintaining the important intervisibility between the pools and Sherborne Village which is identified as a key view in the estate landscape and maintaining the character of the Park and Garden.”*
- 1.1.7 The Parish Council strongly disagrees with this assessment. We contend that the Grade II Park & Garden is already significantly degraded through a complete lack of maintenance over many years (particularly within the last 15 years), with the Broadwaters being allowed to silt-up, and drainage ditches not being maintained. Approximately 80-90% of the original open water in the Upper Broadwater and 50-60% in the Lower Broadwater has now been lost. Little or no open water is currently visible from the iconic viewpoint on the village road and from Sherborne House and Stables to the south. The proposed scheme will not reinstate areas of open water, but on the contrary, it will extend areas of wetland and scrub within the Park which will cause additional significant harm to the registered heritage asset. *‘The important intervisibility between the pools and Sherborne Village’* will not be retained or restored, and the inherent special character of the parkland and Conservation Area will be further degraded.
- 1.1.8 In addition, the Heritage Assessment fails to recognise the special cultural heritage value of the Broadwaters and Old Park for the local community and the fact that the Broadwaters have defined the village identity for well over 200 years. The Sherborne community produced its own ‘Statement of Community Heritage Significance’ in respect of the Sherborne Brook in 2023, a document which has been endorsed by the Parish Council and printed copies supplied to the National Trust (both local and national leadership teams), but has never been acknowledged by the Trust. The ‘Statement of Community Heritage Significance’ has been submitted to Cotswold District Council in support of the Parish Council’s objection and is referenced as ‘Appendix 3 - Statement of Community Heritage Significance’.
- 1.1.9 The Parish Council is dismayed by the National Trust's disingenuous assessment of the heritage value of the Old Park and the Broadwaters and its inaccurate and somewhat scant assessment of the likely landscape and heritage impacts of the proposed development.

1.2 Ecological Assessment

- 1.2.1 The submitted ecological assessment is considered to be unsound for several reasons. Firstly, the ecological survey of the site was carried out almost two and a half years prior to the submission of the application. Moreover, the survey was undertaken at a suboptimal time of year, specifically in early March. These timings do not accord with best practice guidelines set out by the Chartered Institute of Ecology and Environmental Management, which recommends that ecological surveys should be recent and conducted during appropriate seasons to ensure up-to-date and accurate results.
- 1.2.2 In addition, the application is not accompanied by appropriate Protected Species Assessments, yet the Parish Council is aware that there are otters and water voles within the Sherborne Brook at the application site and there are numerous badger setts in the local area. The application site also includes remnant trees within the former poplar plantation, which are scheduled for removal as part of the proposed scheme. These trees may provide potential roosting habitats for bats.
- 1.2.3 The application documents fail to provide any details regarding construction methodologies. As a result, there is no information on how the proposed construction works will affect the existing habitats or species present within the site. This omission is a significant concern.
- 1.2.4 We also note the response provided by CDC's Senior Biodiversity Officer which recommends that the scheme should be Refused.

1.3 Flood Risk Assessment

- 1.3.1 Due to the size of the development area and its location within Flood Zone 3, a full Flood Risk Assessment (FRA) must be submitted with the planning application. However, having taken advice from an independent hydrological consultant, the Parish Council has been informed that the submitted 'Flood Risk Analysis' does not constitute an appropriate Flood Risk Assessment as it fails to address criteria cited in the checklist for a site-specific FRA in the Government's National Planning Practice Guidance.
- 1.3.2 The 'Flood Risk Appraisal' lacks detailed topographical survey data, historic river level monitoring data and historic flood information, including details of the extreme flood events which occurred within the garden of Sherbrooke House (immediately north of the proposed development area) on four occasions between September 2024 and January 2025. Each of these flood events reached the predicted extent of the 1 in 100-year flood event (including an extra 43% margin for climate change). These recent flood events and the omissions in the flood risk appraisal are of concern to the Parish Council and the owner of Sherbrooke House.

1.4 Landscape and Visual Impact Assessment

- 1.4.1 The Parish Council was surprised that a comprehensive Landscape and Visual Impact Assessment was not included with the application, especially since the proposed development is within a Registered Park and Garden, a Conservation Area, and the

Cotswolds National Landscape. We feel that the application fails to adequately address the landscape and visual impacts of the scheme and that a proper assessment should be carried out in accordance with the *Guidelines for Landscape and Visual Impact Assessment* published by the Landscape Institute and the Institute of Environmental Management & Assessment.

- 1.4.2 There are numerous sensitive visual receptors in the locality, including listed buildings, residential properties and public rights of way which directly overlook the site, as well as the iconic views across the parkland and Broadwaters from the village road and from Sherborne House and Sherborne Church (both listed Grade II*) and from the adjacent Stable Block (Grade II).
- 1.4.3 We have already seen significant negative visual impact upon these receptors caused by the silting up and degradation of the Broadwaters over the past 15 years, in addition to the adverse landscape impact this has caused upon the special character of Sherborne village and its Conservation Area. The scheme's objective of creating additional areas of marshland will only serve to further degrade the inherent beauty of this historic landscape and will have further significant adverse visual impact upon nearby residents and other visual receptors.
- 1.4.4 We note that a landscape consultant response has been prepared and submitted by Planscape Consultants Ltd on behalf of the District Council (dated 31/10/2025). This response recommends that additional visual material should be submitted and reviewed in order to understand the residual effects of the works and the potential change to the parkland setting, particularly affecting key views between the Upper and Lower Pools and Sherborne Village.

1.5 Arboricultural Impact Assessment

- 1.5.1 We note that an Arboricultural Impact Assessment did not form part of the original planning application but appreciate that an Assessment and Method Statement have been subsequently submitted post validation.
- 1.5.2 However, the Parish Council considers that the submitted Arboricultural Impact Assessment and Method Statement are deficient due to the following omissions:
- i. The documents do not assess the potential physical impact of placing woody material for the "leaky dam" and baffles within the Brook. The proposed work involves excavation at the brook edge, along with access for plant and machinery, which is likely to affect the Root Protection Areas (RPAs) of trees T3, T5, T6, T7, T8, and T9 on the north bank. Additionally, no arboricultural method statement has been provided for these activities.
 - ii. The Impact Assessment fails to address the possible adverse effects upon trees on the north bank, resulting from elevated water levels due to the installation of the proposed dam and baffles. The trees on the north bank include a veteran oak tree (T3), which is particularly sensitive.

- iii. The remaining trees in the former poplar plantation to the south have not been surveyed and the potential impact of the development upon these trees has not been assessed.

2. TECHNICAL REVIEW

2.1 Independent Hydrological Review

2.1.1 The Parish Council, along with a significant number of people within the community, have reservations regarding the effectiveness of the proposed scheme in removing silt from the Brook and whether it will have any significant effect in reducing the continued build-up of silt and weed growth within the Broadwaters. In addition, concerns have been raised in respect of increased water levels within the Brook and flood risk to nearby properties due to the introduction of the proposed baffles and “leaky dam”.

2.1.2 Because the Parish Council lacks the necessary expertise to judge the efficacy of the scheme and the potential for additional flood risk, we have commissioned a Hydrological Review report in order to fully understand the technical details of the scheme and to make an informed consultation response. The report has been undertaken by Dr Paul Webster (Principal Hydrologist at Corylus Planning & Environmental Ltd) and has been submitted to Cotswold District Council in support of the Parish Council’s objection (See Appendix 2 – Hydrological Review Report’).

2.1.3 The key findings of the report are:

- i. Lack of evidence or modelling: No hydrological performance analysis has been provided to demonstrate how the scheme would function or deliver benefits under normal or flood conditions.
- ii. Ineffective silt control: Only a small fraction of total flow would enter the proposed wetland, meaning most silt would continue downstream into the Broadwaters, undermining a core objective.
- iii. Loss of clean inflow: Blocking the southern, spring-fed ditch would divert clear water away from the Brook, raising groundwater levels and reducing open water.
- iv. Increased flood risk: Proposed baffles and a “leaky dam” could cause in-channel siltation, reduce conveyance capacity, and potentially heighten flood risk - particularly in the absence of maintenance.
- v. No maintenance strategy: The scheme will require long-term management, yet no maintenance plan is included.
- vi. Non-compliant works: Depositing excavated material in Flood Zone 3b near the Narrowwater conflicts with NPPF policy and risks reducing flood storage.

- vii. Invalid flood risk documentation: The submitted “Flood Risk Analysis” fails to meet national guidance for a site-specific Flood Risk Assessment and lacks calibration against historic flood data.

2.1.4 The key recommendations of the report are:

- i. The Applicant should go back to the beginning. They should seek an improved understanding of the mechanisms utilising baseline information. This should include reference to the silt concentrations in time and space.
- ii. Having established a sound conceptual model, the Applicant should then undertake an Options Appraisal. This should be supported by relevant hydrological and hydraulic analysis. The Options to be considered should include the proposed scheme as well as a range of conventional vegetation maintenance strategies.
- iii. Engagement should be undertaken with the local Community, who are likely to be supportive in making observations, gathering data, providing labour and generally contributing to the development of a viable, sustainable scheme for the Broadwaters.

2.1.5 Having reviewed the expert report and considered local opinion, Sherborne Parish Council finds the scheme is technically unsound, inadequately evidenced, and inconsistent with planning and flood-risk policy, failing to meet its intended environmental or flood management objectives.

2.1.6 The application also lacks measurable performance indicators or monitoring criteria to assess whether objectives are achieved. This is an especially serious omission given the permanent alteration of a Grade II Registered Park and Garden.

2.1.7 The closing comment in the Hydrological Review report reads: *“this is an ill-conceived scheme which, in its current form, should be rejected.”*

3. PLANNING POLICY NON-COMPLIANCE

3.1 Cotswold District Local Plan Policies

3.1.1 The Parish Council contends that the proposed development does not comply with the following policies within the extant Cotswold District Local Plan:

- *POLICY EN1 - BUILT, NATURAL AND HISTORIC ENVIRONMENT*: requires the protection, conservation & enhancement of the historic and natural environment.

The Parish Council considers that the scheme fails to enhance or restore the Broadwaters and the historic parkland.

- *POLICY EN4 - WIDER NATURAL AND HISTORIC LANDSCAPE*: only permits development where it does not have a significant detrimental impact on the natural and historic landscape.

The proposals fail to take account of the historic landscape character, visual quality and local distinctiveness of the site. The scheme does not restore nor better manage the historic landscape.

- **POLICY EN5 - COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY (AONB):** states that *“In determining development proposals within the AONB or its setting, the conservation and enhancement of the natural beauty of the landscape, its character and special qualities will be given great weight.”*

It is considered that the scheme will not conserve or enhance the natural beauty of the existing historic landscape, nor will it enhance the character and special qualities of the AONB (Cotswold National Landscape) within the locality of the site.

- **POLICY EN10 - HISTORIC ENVIRONMENT: DESIGNATED HERITAGE ASSETS:** states that *‘great weight will be given to the asset’s conservation’ and ‘proposals that would lead to harm to the significance of a designated heritage asset will not be permitted.’*

The proposed scheme will not succeed in conserving the heritage asset but, instead, it is likely to result in significant harm.

- **POLICY EN11 - HISTORIC ENVIRONMENT: CONSERVATION AREAS:** states that *“development proposals will be permitted provided they preserve and enhance the special character and appearance of the Conservation Area.”*

The proposals submitted by the National Trust will not preserve and enhance the character and appearance of the Sherborne Conservation Area, the heart of which is the historic parkland and open water bodies within the river valley. The 'Sherborne Conservation Area - Statement of Policy' (written by Cotswold District Council in 1983) states that *“Every effort will be made to preserve the best buildings, groups of buildings, walls, open areas, natural features and trees upon which the character of the Conservation Area depends.”*

3.2 The National Planning Policy Framework (NPPF)

3.2.1 The Parish Council considers that the development proposals do not meet the requirements of NPPF paragraphs 212 and 213 (regarding heritage) and paragraph 189 (in respect of National Landscapes).

- Para. 212 - states that *“Great weight should be given to the asset’s conservation”:*

The Parish Council believes that the Registered Park & Garden is likely to suffer a loss of significance due to the harm which would result from the visual intrusion of the proposals into key views, and presumption that the area can subsequently be managed as wetland.

- Para. 213 – states that *“Any harm to, or loss of, the significance of a designated heritage asset requires clear and convincing justification”*:

The Parish Council does not consider that the justification for the harm in this case has been adequately demonstrated.

- Para. 189 – requires that *“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.”*

The scheme will not conserve and enhance the Cotswolds National Landscape within the site and surrounding area.

4. COMMUNITY CONSULTATION AND OPINION

4.1 Community Questionnaire

- 4.1.1 Recognising the importance of the National Trust’s wetland scheme and its potential impact upon Sherborne’s historic landscape and the local community, Sherborne Parish Council conducted a local consultation to ensure its formal response to Cotswold District Council accurately reflected community views.
- 4.1.2 During October 2025, Sherborne residents were invited to complete a questionnaire on the proposed wetland scheme and the National Trust’s planning application. The questionnaire was concise and accessible, available as a paper copy (returnable to the Village Shop) or as an online version.
- 4.1.3 The consultation produced 41 written responses - representing circa 30% of Sherborne households - and reflecting strong local interest in the proposed wetland habitat scheme. In several cases, respondents indicated that their answers reflected the shared views of their spouse, household, or family members, suggesting that the total number of individuals represented is somewhat higher than the number of formal submissions received.
- 4.1.4 The overall sentiment of the responses was that approximately 75% of the respondents opposed or expressed significant reservations about the proposal; 15% indicated conditional support; and around 10% were broadly supportive.
- 4.1.5 The key concerns identified were:
 - Heritage and landscape impact (70%) – Widespread concern that the scheme would harm the Grade II Registered Park and Garden’s historic and visual character.
 - Effectiveness and design (65%) – Many questioned whether the scheme would effectively reduce siltation without complementary dredging or upstream interventions.

- Flood risk and maintenance (55%) – Over half feared the project could increase local flood risk or require ongoing maintenance without clear funding.
- Ecological evidence (40%) – Several respondents doubted the adequacy and accuracy of ecological surveys, especially regarding protected species.
- Consultation and transparency (60%) – Numerous comments criticised the National Trust’s engagement process as late, limited, and insufficiently transparent.

4.1.6 Despite these concerns, most residents supported the principle of improving water quality and biodiversity, provided that the proposal:

- i. Protects Sherborne’s historic landscape and open water views;
- ii. Includes independent, up-to-date evidence;
- iii. Offers a clear and funded maintenance plan; and
- iv. Involves genuine collaboration with the community.

4.1.7 Below is a summary of the written comments provided by respondents:

i. Community Confidence and Consultation:

There is a widespread lack of confidence that residents’ views were genuinely considered by the NT. Many felt that meetings were poorly managed, communication was unclear, and the process was a formality with decisions already made. Residents reported that engagement was late, superficial, and dismissive, with a sense of being “talked down to” and managed rather than involved. Several comments highlighted that questions went unanswered, important staff were absent, and information was withheld. There was a strong call for early, transparent dialogue and meaningful involvement of locals and experts in decision-making.

ii. Quality and Accessibility of Information:

The published information was widely regarded as overly technical, confusing, and difficult for laypersons to understand. Key details were buried in lengthy documents, and some information was seen as ambiguous, contradictory, or misleading. Residents noted the lack of clear, concise summaries and the absence of up-to-date ecological assessments and heritage information relevant to the Broadwaters.

iii. Support for the Proposed Scheme:

The overwhelming majority do not support the scheme as described. Residents are concerned that the project will degrade the historic landscape, fail to restore open water, and worsen the area’s appearance and ecological value. There is significant distrust towards the NT, with repeated references to neglect, broken commitments, and a lack of maintenance. While some support the principle of reducing silt and enhancing biodiversity, they question the chosen methods, location (within a Grade II Listed Park and Conservation Area), and the lack of evidence for effectiveness. The need for dredging and traditional maintenance was emphasised repeatedly.

iv. Environmental Impact and Effectiveness:

Residents are highly sceptical that the scheme will successfully reduce silt, manage flooding, or improve biodiversity. Many believe silt problems stem from a lack of historic dredging and suggest that simple interventions, such as maintaining drainage and removing silt, would be more effective and less damaging. There are fears that the scheme could lead to increased flooding, further silt build-up, loss of open water, and a decline in wildlife, particularly waterbirds. Some call for independent expert assessment and reference the lack of convincing examples or data to support the NT's approach.

v. Impact on Landscape and Heritage:

The proposed works are seen as highly inappropriate for a designated historic landscape. There is widespread concern that the scheme will result in a permanent loss of valued views, open water, and wildlife, further degrading the area's character and contravening conservation policies. The NT is perceived as failing in its duty to preserve the estate's heritage, with some residents expressing a sense of personal loss, anger, and betrayal.

vi. Overall Tone and Relationship:

The relationship between the NT and the Sherborne community is described as being in crisis, marked by anger, disillusionment, and calls for accountability. Many residents have lost trust in the NT and express deep resentment at being excluded from meaningful participation. The NT's engagement is overwhelmingly seen as inadequate, high-handed, and lacking in honesty and openness. There are frequent calls for a reset in approach, genuine collaboration, and restoration of both the landscape and trust.

- 4.1.8 The full questionnaire, with an analysis and summary of all of the answers received will be submitted to Cotswold District Council as an appendix to the Parish Councils consultation response. This is referenced as 'PC Appendix 1 – Community Questionnaire'.

4.2 Planning Application Objections

- 4.2.1 At the time of submission of the Parish Council's consultation response, there are 50 objections to Planning Application 25/02583/FUL published on Cotswold District Council's website.
- 4.2.2 The overwhelming sentiment expressed by Sherborne residents, local stakeholders, and other objectors to the National Trust's planning application for the creation of a wetland adjacent to the Sherborne Broadwaters and the Grade II registered parkland is one of strong opposition. The following summary of key themes and arguments are consistently raised across the detailed objections:

i. Heritage and Landscape Impact:

- The Broadwater and parkland are cited as significant 18th-century designed landscapes, integral to Sherborne's identity and village character, and protected by multiple local and national planning policies.
- Objectors argue the proposed wetland scheme would irreversibly alter and damage the historic open water landscape, changing it from cherished once open water to marsh or swamp, undermining its aesthetic, cultural, and ecological value.
- Many references are made to the NT's neglect since acquiring the estate, with former maintenance such as periodic clearing abandoned, resulting in silted and overgrown waters.
- The NT is accused of failing to appreciate or thoroughly research the area's true historical significance, with assertions that the Broadwater's origins are earlier than suggested in the application, and that the heritage assessments lack rigour and consultation with relevant experts or statutory bodies.

ii. Ecological and Environmental Concerns:

- The ecological surveys underpinning the proposal are described as outdated, incomplete, or seasonally inadequate, with no robust evidence that the scheme will achieve the promised biodiversity uplift.
- Claims of increased biodiversity and habitat improvement are challenged, both on the grounds of insufficient evidence and because the loss of open water is believed to be detrimental to existing species, especially waterfowl.
- Objectors stress that existing water meadows and wetland features within the estate, which could be restored or extended, are more suitable for such interventions.

iii. Flood Risk and Technical Flaws:

- Significant doubts are raised regarding the technical soundness of the Flood Risk Assessment, with claims that recent changes to the site (e.g., fallen trees, silt management upstream) render modelled scenarios obsolete.
- There are concerns that the proposed scheme could increase flood risk to properties and land adjacent to the Brook, and that key legal infrastructure (e.g., water supply easements) have been ignored.
- Many objectors point out that the main sources of silt (road runoff and upstream sources) have recently been addressed or could be managed more effectively and cheaply through traditional interventions such as ditch and gully maintenance, without altering the historic landscape.

iv. Lack of Consultation and Procedural Failures

- Numerous objections highlight insufficient community involvement, with the planning process described as a *fait accompli* rather than a genuine consultation. Promised sharing of key documents (like the Conservation Management Plan) and meaningful engagement with statutory consultees and local heritage organisations has not occurred.

- Key appendices and technical documents referenced in the application are missing, and local knowledge, including community-commissioned heritage statements, has been disregarded.
- v. Financial and Management Concerns:
- The scheme is widely criticised as an expensive experiment (with an estimated cost of £200,000) without a clear maintenance or management plan, and no defined or measurable criteria for success.
 - Objectors fear the NT lacks the funds, commitment, or track record to ensure the long-term stewardship of the site, referencing previous failures (such as the water meadows project) where restored features were subsequently neglected.
- vi. Policy Non-Compliance:
- It is repeatedly asserted that the proposals conflict with multiple local plan policies (EN1, EN4, EN5, EN10, EN11) and the National Planning Policy Framework, all of which require the conservation and enhancement of heritage and landscape assets, and the prevention of harm to designated historic environments.
- vii. Suggested Alternatives and Conclusion:
- Objectors broadly support environmental enhancement in principle but urge that the NT should prioritise restoring and maintaining the Broadwater and its landscape to its historic open water state, using traditional management (dredging, silt traps, proper drainage).
 - There is a call for collaborative, evidence-based approaches involving local expertise, and for any future proposals to be rooted in robust data, with transparency and genuine consultation.
 - Many recommend that the Council refuse or defer the current application until a comprehensive heritage and hydrological assessment, clear management plan, and meaningful community engagement are undertaken.

4.2.3 In summary, the objections reflect deep concern for the heritage, landscape, and community of Sherborne, with a strong consensus that the current planning application is fundamentally flawed, both in process and substance, and should not proceed in its current form. See Appendix 4 – District Council Consultation for further detail.

4.3 National Trust Consultation

4.3.1 Sherborne Parish Council feels that the National Trust has failed to conduct a transparent, inclusive, or good-faith consultation in relation to the proposed Wetland Enhancement scheme. The process has been marked by withheld information, broken commitments, and a lack of meaningful community involvement and consultation. The National Trust seemingly confuse ‘inform’ with ‘consult’. The words are not the same and are not interchangeable.

4.3.2 Key evidence within the application not published

- The National Trust’s application confirms that a Conservation Management Plan (CMP), which underpins the heritage impact assessment, has informed the proposal but the document has not been shared with Cotswold District Council (CDC), the community, or relevant agencies like The Gardens Trust and Historic England.
- Contradictory statements about the CMP’s publication timing and content further undermine confidence. The planning application dates the CMP as “2023” and NT have suggested to the community that the CMP’s public release was imminent since Autumn 2023. Ever since, publication of the CMP, has always been ‘imminent’. The latest guidance (November 2025) from the NT is that the CMP will be published before the end of the year.
- Without sharing the CMP, the NT has relied on evidence that others could not review. Its exclusion means that the consultation for this application is incomplete.

4.3.3 Broken National Trust commitments on engagement

- The NT met with concerned local riparian landowners regarding outline plans for the Broadwaters in September 2023, promising minutes and ongoing engagement, but neither were delivered.
- No follow-up consultation on the proposal occurred for 21 months, until a fully formed plan was presented to the Sherborne community in June 2025 (two weeks before the NT’s original date for planning application submission). Describing this as ‘community consultation’ is disingenuous.
- In parallel, during a public meeting attended by CDC, the NT had agreed in March 2024 to create a joint working group, endorsed by Cotswold District Council, with the Parish Council and local community towards its “Big Nature, Better Access” project (of which this application is described as being part), but since then, the NT have consistently rejected the formation of the group.

4.3.4 Tokenistic public consultation

- The two June 2025 public sessions were ‘for information’ briefings, not consultations.
- Plans were presented as a “fait accompli”, with little opportunity for influence or feedback.
- Following strong community concern at the public sessions, an escalation meeting was held on 9th July 2025 with the NT, JBA Consulting, riparian owners, and the Parish Council, but it also produced no changes to the scheme or timeline. The Parish Council’s minutes of this meeting is provided as part of its submission and is referenced as ‘Appendix 5 – Minutes of Meeting, 9th July 2025’.

- The National Trust’s characterisation of these sessions as “consultation” is misleading and fails to meet accepted standards of public engagement for a project of this sensitivity and scale.

4.3.5 Confusing and selective information presented in the planning application

- Documentation was overly technical, incomplete, and inaccessible to residents.
- Key reports (e.g. Heritage and Ecology) lacked essential details and up-to-date data.
- Excessive jargon and poor presentation limited public understanding.

4.3.6 Community Sentiment (see Sections 4.1 and 4.2 above)

- Residents reported feeling ignored, patronised, and excluded from decisions affecting Sherborne. See relevant appendices.
- Many accused NT of withholding information. There has been a severe breakdown of trust, with widespread frustration and calls for accountability.

4.3.7 In conclusion, the Parish Council feels that the consultation process:

- Failed to meet basic standards of transparency and inclusivity.
- Lacks core evidence (CMP).
- Ignored prior commitments for collaborative working.
- Presented a predetermined scheme under the guise of community engagement.

4.3.8 The Parish Council therefore concludes that the National Trust’s consultation cannot be considered valid and urges that:

- i. The Conservation Management Plan is released in full;
- ii. A genuine consultation process is undertaken with the Parish Council, the local community, and statutory consultees;
- iii. The community working group for “Big Nature, Better Access” is formally established.

4.4 **Community Petition**

4.4.1 A community petition has been instigated by a number of village residents, independent of the Parish Council.

4.4.2 The petition reads as follows:

‘We the residents of Sherborne village and neighbouring villages vehemently object to the proposed wetland scheme, reference number 25/02583/FUL. We, the residents,

are at the heart of the Sherborne Estate and the National Trust has a duty to listen to our views.

We believe the Sherborne Broadwater / Ornamental Waters are very likely part of the “picturesque” movement of the late 18th century and or the early 19th century and should not be altered but instead should have been maintained in the spirit of ‘continuity’ as Lord Sherborne requested.

The lack of maintenance of the whole estate and particularly the Broadwater has caused personal anxiety to many of the residents as well as having devalued their homes. We feel the National Trust should act in the interest of the community and return the Broadwater back to its former glory.’

4.4.3 At the time of the submission of the PC’s consultation response, the petition has received 112 signatures in support of its motion.

4.4.4 The full petition with signatures can be supplied by the Parish Council on request.

4.5 Statement of Community Heritage Significance

4.5.1 As previously mentioned in paragraph 1.1.8, the Sherborne community has produced its own ‘Statement of Community Heritage Significance’ in respect of the Sherborne Brook and its associated landscape. The Statement assesses the history, landscape significance, and ecology of the Brook, and its intrinsic value to the community’s heritage. The document has been endorsed by the Parish Council but has never been acknowledged by the National Trust.

4.5.2 The ‘Statement of Community Heritage Significance’ forms an appendix to the Parish Council’s consultation response and had been submitted to Cotswold District Council as supplementary information. The document reference is ‘Appendix 3 - Statement of Community Heritage Significance’.

5. PARISH COUNCIL RECOMMENDATIONS

5.1.1 The Parish Council recommends that the currently proposed scheme by the National Trust is abandoned and that a more holistic approach is adopted to:

- minimise the volumes of silt entering Sherborne Brook and the Broadwaters,
- reinstate significant areas of open water within the Broadwaters to restore the highly valued 18th century landscape, and
- create alternative areas of wetland within the estate where biodiversity can be significantly enhanced and flood risk can be more comprehensively mitigated over a larger area.

5.1.2 We suggest that the NT should work collaboratively with the village community, local riparian landowners, the Windrush Catchment Partnership and the Highways Authority to tackle silt deposition within the Sherborne Brook catchment area and more specifically to

minimise the amount of silt entering the Brook as run-off from local roads. It is believed that the latter can be achieved by implementing a relatively simple project employing the principles of Sustainable Drainage Schemes (SuDS), whereby drainage grips are dug and maintained at regular intervals along local roads within the river catchment, and the run-off is managed through a series of swales and small retention basins / silt traps which could be constructed within adjacent fields and woodland owned by the National Trust and others. This intervention would have very minimal landscape and visual impact and would not cause harm to the Registered parkland. Moreover, the provision of localised wet basins and ponds would create additional habitats to promote biodiversity.

- 5.1.3 In respect of restoring the Broadwaters, the only practical and effective way of doing this is by mechanically removing the silt and emergent vegetation which has accumulated over the past 20 – 30 years. The Parish Council accepts that this is a significant financial and environmental undertaking and will require the input of specialist consultants and contractors to achieve a long-term sustainable scheme which minimises any adverse environmental impacts. But this type of intervention can be successfully and sustainably achieved, as has been recently demonstrated at Blenheim Palace and at a number of National Trust properties (including Croome Court, Berrington Hall and Claremont).
- 5.1.4 The National Trust have recently discussed the intention for mechanical removal of some vegetation and silt from the Broadwaters to restore a level of open water, and the Parish Council would support this approach, provided it is guided by robust historical and ecological assessment. The Parish Council emphasises that this intervention is entirely viable as a standalone measure and should not be dependent on, or conditional upon, the currently proposed wetland scheme.
- 5.1.5 From a flood risk perspective, it is recommended that the sluice gates and by-pass channels within the Broadwaters are properly restored to manage periodic high-water levels and to prevent uncontrolled spillage. The National Trust is also urged to remove fallen trees and other debris within the Sherborne Brook upstream of the Broadwaters, where this is causing river levels to rise and flooding on adjacent land not owned by the National Trust.
- 5.1.6 Furthermore, there is considerable potential to implement a major habitat creation and flood alleviation project on the former water meadows and adjacent land located in the lower reaches of Sherborne Brook and adjoining the River Windrush (outside of the Registered Park & Garden and Conservation Area). The floodplain in this area offers tens of hectares of low-lying land that could be seasonally flooded by reinstating the historic sluice and ditch network, alongside other green engineering and nature-based solutions. This initiative would not only deliver significant biodiversity gains and substantial flood storage capacity but would also restore another important segment of Sherborne's historic landscape.