COTSWOLD
District Council

Supplement for

PLANNING AND LICENSING COMMITTEE - WEDNESDAY, 12 NOVEMBER 2025

Schedule of Applications

To consider and determine the applications contained within the enclosed schedule:

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PLANNING AND LICENSING COMMITTEE
12 November 2025
ADDITIONAL PAGES *(Published 10.11.2025)*

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ADDITIONAL REPRESENTATIONS ON AGENDA ITEMS : Pages 1 - 32		
Agenda No:	**Ref No:**	**Content:**
8	**25/02458/FUL** *(Brook Close Rodmarton)*	**Case Officer Update:** The applicant's agent, Montagu Evans LLP, has requested that a response provided to the Conservation Officer's comments, received on 6th October 2025, is brought to the attention of Members. This is attached in full. Also submitted is a 'High Level Comparative Whole Life-Cycle Carbon Assessment', received on Monday 10th November 2025. This is also submitted for the attention of Members.

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06 October 2025

FAO Andrew Moody
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By email only to: andrew.moody@cotswold.gov.uk

Dear Andrew,

BROOK CLOSE, RODMARTON, GL7 6PE

We write further to the comments made by the Conservation Officer ('CO') in relation to planning application ref. 25/02458/FUL at Brook Close, Rodmarton, GL7 6PE.

Having considered these comments in detail and the suggested reasons for refusal, we set out the following observations and comments.

LOSS OF A NON-DESIGNATED HERITAGE ASSET

Reviewing the response, as a whole, it appears that the CO's assessment is strongly influenced by a desire to protect the existing building (Brook Close / "the Property").

The CO begins their response by asserting that the demolition of the Property, as a non-designated heritage asset, is not justified.

This word, 'justified', must refer to Paragraph 215 of the NPPF which states that harm to a designated heritage asset must be justified on the balance of public benefits, taking into account that harm to a designated asset is a matter of considerable importance and weight.

The policy consideration in relation to a non-designated heritage asset of some heritage interest, not listed and not in a conservation area, is to take the impact of its demolition into account, weighing it up alongside other considerations, but not giving that impact of its loss considerable importance and weight.

The CO's assessment proceeds on the basis that the major alterations to the Property are of no real consequence for its architectural and historic interest. This is, in our view, unreasonable in the circumstances.

The building when first constructed was a small, single-storey cottage, designed by a well-known architect. The original plans of Brook Close show it to be a thatched worker's cottage with two chimneys and wood panelled porch to the principal elevation. It was a modest size, formed of two bedrooms, a living room and shed to the rear[1].

A subsequent fire led to significant alterations, followed by the building being extended and then extended again pursuant to a 1976 consent. The Property is, today, more than double its original size, and those changes have altered its architectural form and proportions. This is a matter of fact.

The original setting to the Property is heavily altered too. When the Property was first constructed, the garden was very different. That garden was limited, comprising a square plot, with the Property at the centre and agricultural land to the north, east and west[2]. In 1966 a garage was built. Subsequent alterations post-1976 then extended the original garden, with the land to the west used for the construction of a small housing development (Barnsley Place). The trees, including a number of non-native species, were planted in 1976.

[1] Since the application was submitted, the Applicant has provided the original plans for the Property which confirm our understanding that the original cottage was a small, single-storey cottage and so has been heavily altered since. These plans are provided at **Appendix 1.0**.

[2] **Appendix 1.0** includes a site plan showing the extent of the original garden.

Figures 4.2-4.8 of the ***Heritage Impact Assessment*** demonstrate these changes.

Essentially, the Site bears no resemblance to how it appeared in the 1930s.

The Rodmarton Conservation Area boundary comes close to the Site but does not include it.

The few features that survive from the first phase of construction – wavy weatherboards, joinery and ironmongery – may be altered without planning permission under Permitted Development Rights.

To assert, as the CO appears to, that these significant changes have very limited impact on the interest of the Property is surprising and, as we observe, unreasonable.

WEIGHING UP THE LOSS OF THE NDHA AGAINST THE REPLACEMENT PROPOSALS

NPPF Paragraph 216 treats non-designated heritage assets ('NDHA'):

> "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."*

Thus, the demolition of an NDHA is not weighted harm, unlike a presumption in favour of preservation which requires a justification, similar to that required to justify harm to a designated asset (conservation area or listed building).

The local plan policy relevant to the loss of NDHA's, Policy EN12, aligns with the requirements set out at Paragraph 216, requiring only a balanced assessment where demolition of a NDHA is proposed.

Policy EN12 does not require the decision-maker to go beyond the requirements set out under Paragraph 216.

Even if the site were in a conservation area, there would be no presumption against demolition. Rather a requirement to consider the completed development's impacts.

CARBON

The CO alleges that the demolition of the Property results in *"the loss of 'whole life carbon'.* This is an inaccurate use of the term. We presume the CO means 'embodied carbon'.

A whole lifecycle carbon analysis looks at the net carbon position having regard to the loss of embodied carbon against the carbon gained in the operational phase (operational carbon) for the lifetime of the development.

Cotswold District Council have no policy requiring the demonstration of a net positive carbon outcome, and there is no national policy requiring the retention of a building for carbon purposes (which was the point in the M&S Oxford Street case).

The CO cites Historic England's Advice Note 18 *'Adapting Historic Buildings for Energy and Carbon Efficiency'*, but this is not policy either.

We have not provided a whole lifecycle carbon analysis because we are not required to. A new structure will be more energy efficient than an old one with thermal upgrades, and more adaptable over the lifetime of its occupants. The Sustainability and Energy Performance Statement, submitted with the application, sets this out together with the sustainability measures which will be delivered by the Proposed Development.

THE LISTED BUILDINGS AT LITTLE TARLTON

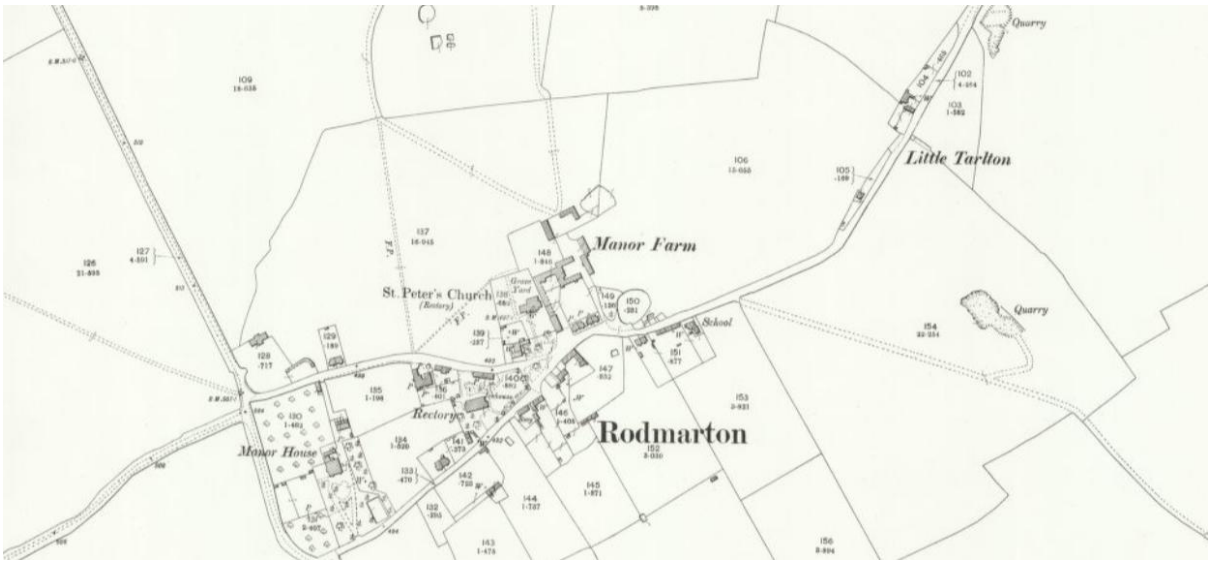
The CO asserts that the Property has group value with the listed buildings at Little Tarlton.

Little Tarlton is not part of Rodmarton Village. Little Tarlton has a distinct identity and is, in effect, a hamlet or outlying group of buildings in Rodmarton parish.

The distinction between Rodmarton Village and Little Tarlton is described by Pevsner in his *Buildings of England Guide*, who notes that *"The hamlet of Little Tarlton, some distance further NE (north-east) consists entirely of a group of seven cottages by Ernest Barnsley, 1925."*

Moreover, the earliest OS map, surveyed 1882 (show below), and prior to the construction of Brook Close, clearly shows Little Tarlton as a separate hamlet east of Rodmarton.

The 1903 OS map (shown below) shows the present plot of Brook Close as forming part of the property of Manor Farm. The boundary of this land stops short of development in Little Tarlton.



From the earliest OS maps, Little Tarlton is clearly distinguished as a distinct hamlet with its own name. Its name is a derivative of the nearby village of Tarlton.

Of the buildings within Little Tarlton, the nearest of the listed buildings to the Property is No. 5 Little Tarlton, some 85 metres distant. It is prominent in the streetscene because of its position next to the road (unlike the Property which is set back and not prominent).

The rest of the listed buildings are still further away, the next nearest being some 175 metres distant.

If there was any meaningful and relevant relationship between Rodmarton and Little Tarlton then the Rodmarton Conservation Area could have been extended to take in these listed buildings.

Characteristically, Brook Close was not designed to be similar to the cottages at Little Tarlton. Little Tarlton is a set piece of seven cottages designed by the same architect, Ernest Barnsley. This is noted by Historic England and repeated on each individual list description of the cottages: *"Between c1909 and 1926, part of a group of 7 cottages by Ernest Barnsley. All in similar style, of coursed and dressed stone, stone slate roof, stone stacks with offset and moulded cornice, all single storey and attic."*

The original plans of Brook Close show it to be a thatched worker's cottage with a large chimney and wood panelled porch to the principal elevation. It was a modest size and single storey, formed of two bedrooms, a living room and shed to the rear.

In its original form Brook Close would have appeared distinct from the cottages of Little Tarlton, not only in separating distance but through the differences in materiality (Brook Close's thatched roof in comparison with the tall pitched slate roofs of Little Tarlton) and form (Brook Close as a single storey, small cottage whilst the Little Tarlton cottages were of two storeys and larger in footprint).

There is no architectural resemblance between these buildings and the Property.

There is no intervisibility as between the Property, existing and proposed, and the more distant group.

There is some intervisibility between No. 5 Little Tarlton and the Property. The visual impact work done by Adam Architecture (see page 31 of the ***Design and Access Statement*** ('DAS') and in full-page spread at Appendix 7.0 of the ***Heritage Impact Assessment***) identified only a single potential viewpoint in which the two may be seen together, over a back garden. This is an incidental view, and the Property is not readily noticeable (you have to look for it).

The parts of the Property which are visible are not the remains of the original 1930's cottage, but later extensions comprising the first floor and roof.

There is no possibility of other views, from the street or any Public Rights of Way as a consequence of separating distance and landscape features.

The visualisations prepared with the planning application (provided at Appendix 7.0 of the ***Heritage Impact Assessment***) demonstrate that the three staggered gables and tall chimneys on the east side of the new building reflects the architectural characteristics of the listed building (No. 5) and, to the extent one would even notice the impact, the effect could not reasonably be described as harmful to the setting of this single building. The proposition that the proposals harm the listed cottages at Little Tarlton is unreasonable.

The CO seeks to diminish the importance of intervisibility by saying that views along the road are kinetic. However, the existing and proposed buildings are not easily visible from the road because of landscape, (and walking between the two takes a couple of minutes). It is unreasonable to suggest that a glimpsed view of one is held in the mind and then compared with the other leading to harm.

Even if there were a noticeable visual interaction, the design and materials of the proposals are complementary and not, therefore, harmful to the ability to appreciate the listed building.

The CO asserts harm by reason of some plot ratio variation between the listed buildings and the proposals. This is not perceptible and even if it were, it is hard to see on what basis some difference diminishes appreciation of the listed buildings.

We draw to your attention a recent SoS case in which a similarly tenuous setting relationship was asserted (the Brighton Gasworks site for Berkeley). There, the SoS and Inspector found the formulation without any merit, and the Council's pursuit of this approach was taken into account in the Inspector's award of full costs against the Council. The appeal reference is APP/Q1445/W/24/3353409.

The CO seeks to dismiss the filtering/occluding effect of vegetation on the basis that all the vegetation might be removed. This is not credible. Both No. 5 Little Tarlton and the Site are single family dwellings whose occupiers want landscape on their boundaries and within their land for reasons of amenity and privacy. The suggestion is hypothetical, to which no weight may reasonably be given.

GROUP VALUE WITH OTHER ARTS AND CRAFTS BUILDINGS WITHIN RODMARTON VILLAGE

Cotswold District Council have no adopted conservation area appraisal for the Rodmarton Conservation Area ('RCA').

The RCA includes the Arts and Crafts house, Rodmarton Manor, which lies on the edge of the village. It is listed Grade I. However, there are no other listed building in the Arts and Crafts manner in the village by a known architect. Whilst the village school and village hall date from this period and were constructed in an Arts and Crafts style, the village character is varied in nature, owing to buildings of varying ages and architectural periods. As described above, the listed Arts and Crafts cottages at Little Tarlton form their own hamlet, separate to Rodmarton and its conservation area.

Thus, any attempt to draw the heavily altered Property into the ambit of the RCA, by reason of some asserted Arts and Crafts linkage, is simply not evidenced. Assuming to the contrary, for the sake of argument, that there was some connection, then Brook Close would be in the RCA. It is not.

RELATIONSHIP WITH THE RODMARTON CONSERVATION AREA

The exclusion of the Property from the RCA puts paid to the assertions of some Arts and Crafts legacy connection. There is none.

The boundary of the RCA was drawn, it appears, to include the village hall to the south, and it comes to the edge of the plot of Brook Close but stops near the drive to the Property, and does not take in its vegetated frontage.

There is no material intervisibility from the RCA to the Property, from within the RCA, and there would be none either in the proposed state (again as evidenced by the visualisations at Appendix 7.0 of the ***Heritage Impact Assessment***).

From outside the CA, looking back at it from the Public Right of Way to the south, one would see the proposals' first floor, set in vegetation, and demonstrating entirely typical vernacular materials and characteristics.

The CO seeks to identify harm to the CA by reason of the proportion of the Site which the proposed building occupies; however, as the DAS documents, the plot ratio of the building to the Site as proposed is generous and in fact greater than that of other buildings of similar footprint. Neither the footprint of the proposals nor the grain of the building and Site are at odds with the RCA, which is itself very mixed in nature.

The point is moot, however, since one would never experience and appreciate either the footprint of the proposals or the grain of the Site from within the RCA or from outside, looking into it.

The Site does contribute to the setting of the RCA by reason of its verdancy, and particular the hedge along the frontage. This hedge is currently unmanaged, and, as per the landscape proposals submitted with the planning application, it is proposed to manage and lay that hedge in a traditional way, which is more appropriate than the current situation.

SCALE, HEIGHT, FORM AND DESIGN

The CO asserts that the proposed scale, height, form and design of the Proposed Development would provide a *"development of formal and high status appearance, resulting in a prominent uncharacteristic house and outbuilding."* We consider that the visualisations presented within this application demonstrate this not to be the case.

The position of the building on the plot and its boundary vegetation, mean that there would be limited awareness of the scale of the building from any public vantage point. Entering the Site, and seeing the building, it would not be incongruous, since its scale is comparable to other houses and buildings in the RCA and in other villages nearby.

Furthermore, the proposed building would be appreciated in a large plot. The layout and arrangement of the proposed building are not cramped, as demonstrated by the plot ratio analysis undertaken by ADAM Architecture (see page 51 of the ***DAS***). Neither is there any objection from neighbouring occupiers.

The design of the proposals, as explained in the ***DAS*** at page 34, conform to the design requirements of the Cotswold Design Code, supporting the development plan's design policies.

The scale and mass of the Proposed Development are similar to other buildings within the village, and smaller than the Victorian villa property which similarly bookends the villa to the west. This is demonstrated by the plan at page 48 of the ***DAS***.

The work Adam Architecture has done ensures that the design is fully contextual, also meeting the design requirements of the National Design Guide.

For example, the principal material proposed for the house is distinctive Cotswold limestone, in keeping with local precedent. The characteristic golden stone and slate roof make reference to the existing cottage on the Site and the materiality of the neighbouring listed building, referencing the existing context of the area. The proposed dwelling will appear complementary when seen in conjunction with No. 5, Little Tarlton.

Where visible in glimpsed views, the dimensions, scale, massing, materiality and architectural style of the Proposed Development will ensure it appears as a high quality, contextual and appropriate home.

The position of the building on the Site, taken together with its heavily modelled design and new landscape, ensures it provides an appropriate response to the edge of the settlement, presenting traditional gabled forms and materials to incidental views of it, set within greenery, from public vantage points.

The impact is, again as a matter of fact, very limited.

In respect of the scale of development on the plot, taking the criticisms of the garage into account, we note that the Council has previously advised the Applicant (via pre-application feedback ref. 22/02890/PAYPRE) that the principle of building a new house and retaining the Property could be supported, which would lead to a greater percentage of footprint on the site. The position now being taken on plot ratio and grain is inconsistent with previous advice.

The scale and form of the garage takes precedent from, and is proportionate with, other garage forms in the village which share the characteristic of steeply pitched roofs, gabled ends and projecting bays. The orientation also considers views looking south from public footpaths across open fields to the north of the Site within the National Landscape, albeit over a substantial distance. Where visible, the gable end of the garage will be seen which reduces the profile of built form on the Site. Any visibility will be of the gable ends, a typical feature of the Cotswolds vernacular, constructed in Cotswold stone and will seem entirely in keeping and appropriate to the local character of the area.

With respect to the landscape, the garden design retains existing trees of amenity value and plants new native tree and hedge species, to provide an appropriate setting for the house and build on the locally distinctive edge of village character. The garden is designed to be functional for a modern family. It is not of formal design.

At **Appendix 2.0**, we replicate the analysis undertaken by Adam Architecture, which demonstrates that the scale and form of the Proposed Development is appropriate for its context.

THE DIRECTION TO REFUSE

The CO's role is to advise you on impact and effect.

It is our view that the CO's analysis is not balanced nor fair in weighing up the benefits and, as noted earlier, imposes a policy test that is not correct.

The relevant design consideration in this case is simply whether the replacement building is of a high standard of design, at least consistent with the character and appearance of the area and meeting the terms of the Cotswold Design Code.

The demolition of the building is simply a planning consideration and cannot be given great weight. Any weight you may chose to give has to take into account the considerable changes to the Property and its location outside the RCA.

There is no objection locally to the proposals, with letters of support from local residents and a councillor.

For example, there are the following observations:

> *"The new house will be proportionate in scale, footprint and size, given the overall size of the site. The house is not listed and is not within the conservation area. The new house will have minimal visual impact and will fit into the landscape seamlessly."*
>
> *"The new house has been designed with much thought: it is in proportion to the site, has taken many sustainability measures on board, includes native tree planting and has minimal visual impact from outside the site."*
>
> *"I find the design very acceptable and in keeping with the other buildings nearby. My view from home and walking the Kings path with dog will be very pleasant."*

We suggest the views of local people, on the appropriateness of the new house, are highly material. They have a good understanding of what is in keeping and appropriate.

The Proposed Development has been designed by eminent architects, ADAM Architecture, and landscape designers, Colvin & Moggridge. This demonstrates the Applicant's commitment to design quality and integration with the surrounding area.

We are in no doubt that the proposals meet the policies of the development plan. Our analysis of the CO's response demonstrates a closed mind and is in many respects unreasonable.

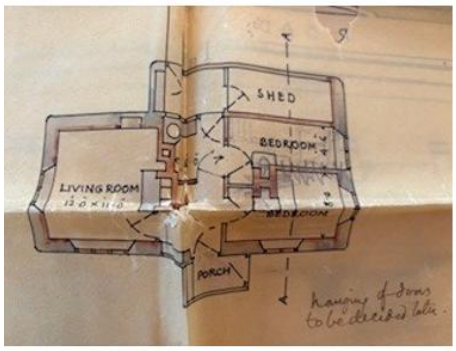
Yours truly,

MONTAGU EVANS LLP

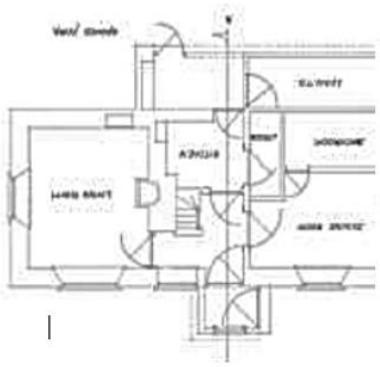
Enc.

- Appendix 1.0 – Plans of the original 1930's house, the house in 1975 and 2025
- Appendix 2.0 – Site analysis and study

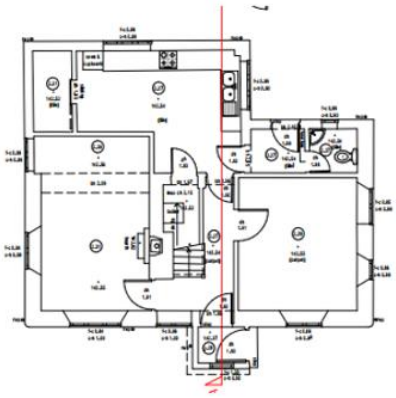
APPENDIX 1.0 – PLANS OF THE ORIGINAL 1930'S HOUSE, THE HOUSE IN 1975 AND 2025



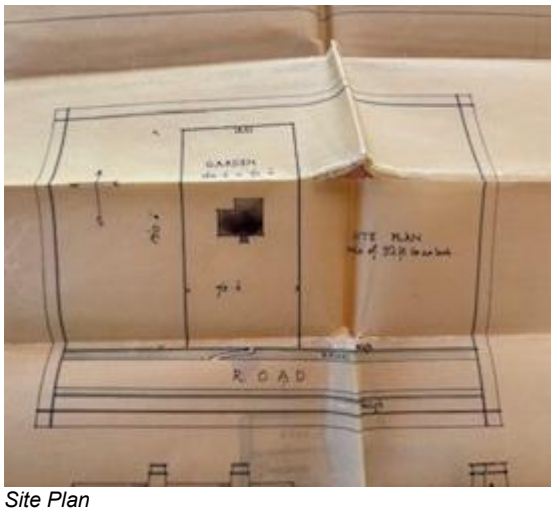
original



1975 as existing



2025 as existing



Site Plan

APPENDIX 2.0 – SITE ANALYSIS AND STUDY

SITE ANALYSIS - OCCUPANCY CALCULATIONS

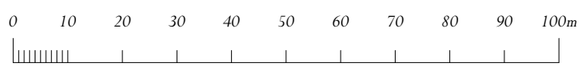
BARNSLEY PLACE - PREVIOUS	SITE AREA (m^2)	BUILT AREA (m^2)	Occupancy of building on site (%)
Garage 01	2619.0	67.7	*2.6%*
Garage 02	""	38.5	*1.5%*
Total	**2619.0**	**106.2**	***4.1%***

BARNSLEY PLACE - CURRENT	SITE AREA (m^2)	BUILT AREA (m^2)	Occupancy of building on site (%)
Dwelling 01 *(including garage)*	2619.0	139.9	*5.3%*
Dwelling 02	""	54.0	*2.1%*
Dwelling 03	""	69.9	*2.7%*
Dwelling 04	""	94.3	*3.6%*
Dwelling 05	""	96.5	*3.7%*
Parking and shared site	""	43.5	*1.7%*
Total	**2619.0**	**498.1**	***19.0%***

BROOK CLOSE - EXISTING	SITE AREA (m^2)	BUILT AREA (m^2)	Occupancy of building on site (%)
Existing Main House	4313.6	83.1	*1.9%*
Existing Garage	""	19.9	*0.5%*
Existing Outbuilding A	""	9.8	*0.2%*
Existing Outbuilding B	""	9.2	*0.2%*
Existing Total	**4313.6**	**122.0**	***2.8%***

BROOK CLOSE - PROPOSED	SITE AREA (m^2)	BUILT AREA (m^2)	Occupancy of building on site (%)
Proposed Main House	4314.6	219.3	*5.1%*
Proposed Garage	""	61.4	*1.4%*
Existing Total	**4314.6**	**280.7**	***6.5%***

SITE	INCREASE IN BUILT AREA
BARNSLEY PLACE	469%
BROOK CLOSE	230.1%



Site Analysis - Occupancy Calculations

Brook Close - Rodmarton Replacement House

Scale:1:1000 @ A3

Drawing Number: 6503-PL09 Rev | April 2025 | Drawn By: AB

ADAM ARCHITECTURE

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SITE ANALYSIS - NEIGHBOURING BUILDING MASS

Residential Buildings <120m²

Residential Buildings >250m²

Non Residential Buildings

Residential Buildings <250m²

GOOGLE MAPS EXTRACT OF RODMARTON SOUTH-WEST EDGE

(OS MAP DOES NOT CAPTURE THIS AREA)

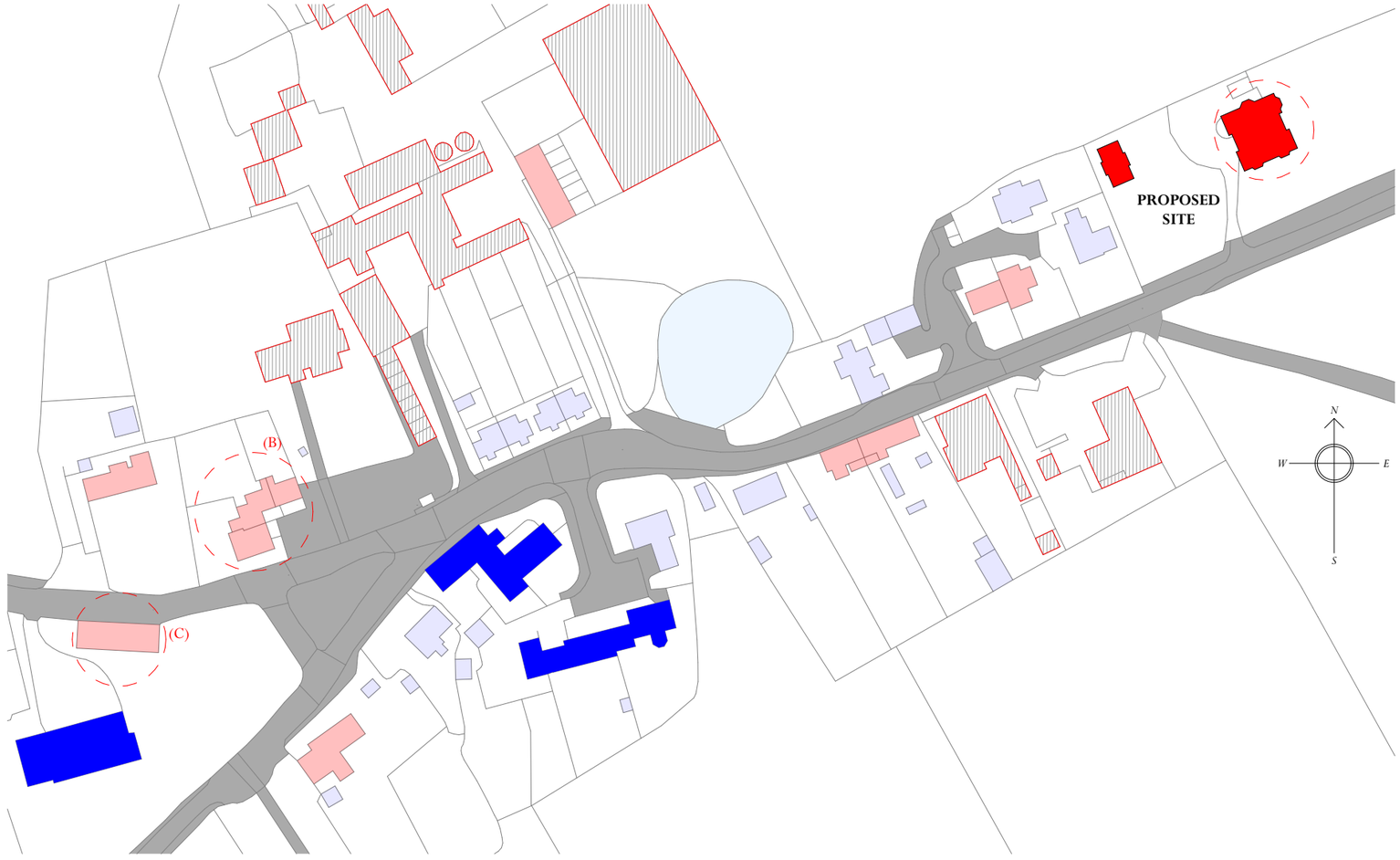
THIS AREA HAS BEEN INCLUDED DUE TO THE CLOSE PROXIMITY IN RELATIVE SCALE OF DEVELOPMENT AND SIZE OF PLOT.

0 10 50m

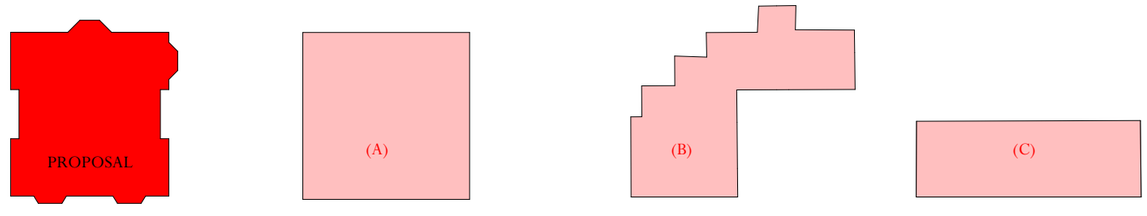
Scale 1:500

0 10 20 30 40 50 60 70 80 90 100 110 120 130m

Scale 1:1250



SITE PLAN (1:1250)



219 m2 233.5 m2 185 m2 143 m2

SIMILAR MASSING IN PROXIMITY TO PROPOSED SITE (1:500)

Site Analysis - Neighbouring Building Mass

Brook Close - Rodmarton Replacement House

Scale:1:1250, 1:500 @ A3

Drawing Number: 6503-PL33 Rev | January 2025 | Drawn By: TF

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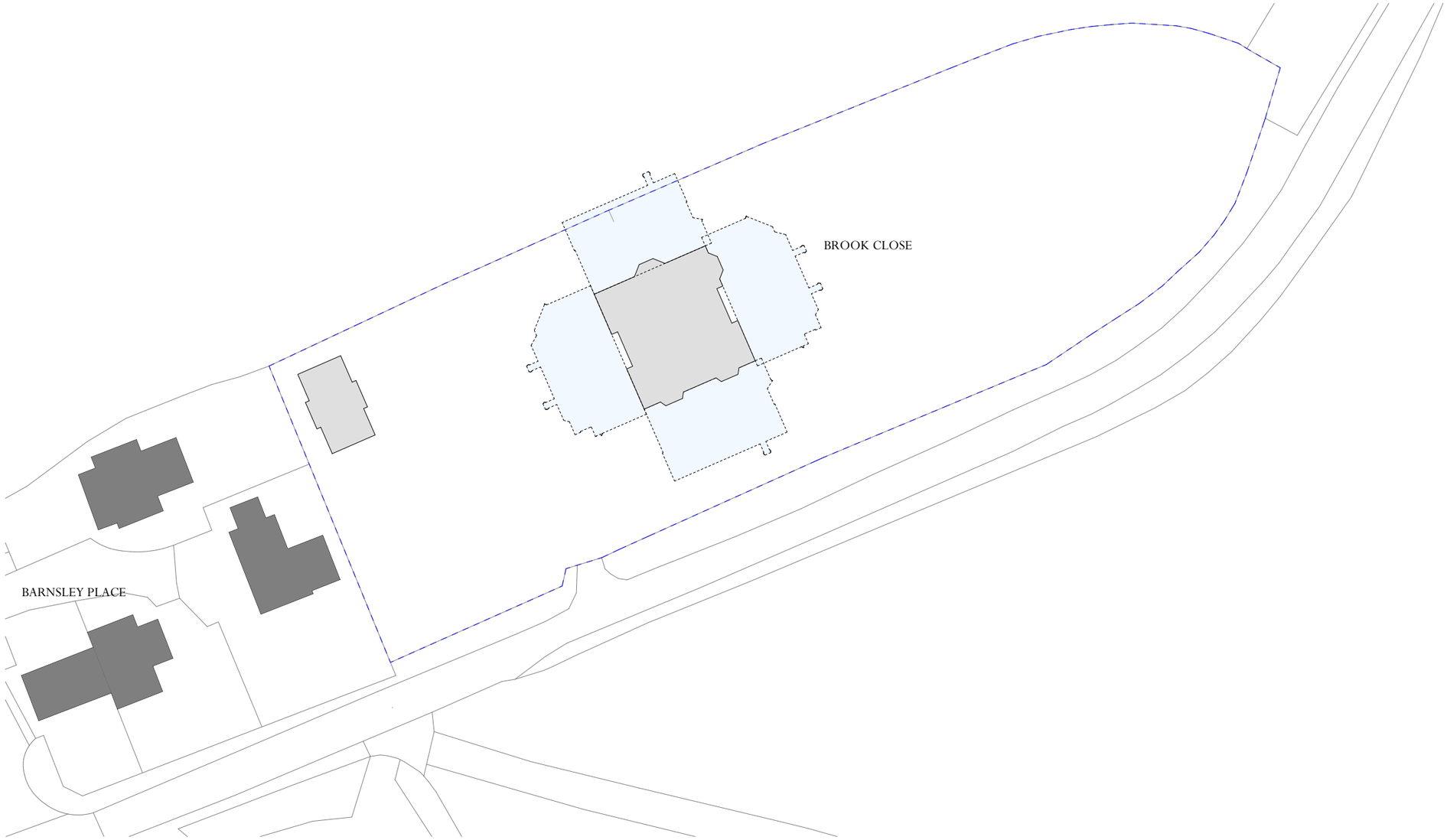
SITE ANALYSIS - EXTRAPOLATED ELEVATIONS



PROPOSED UNFOLDED ELEVATIONS

Site Analysis - Extrapolated Elevations

Brook Close - Rodmarton Replacement House

Scale:1:500 @ A3
Drawing Number: 6503-PL34 Rev | April 2025 | Drawn By: AB

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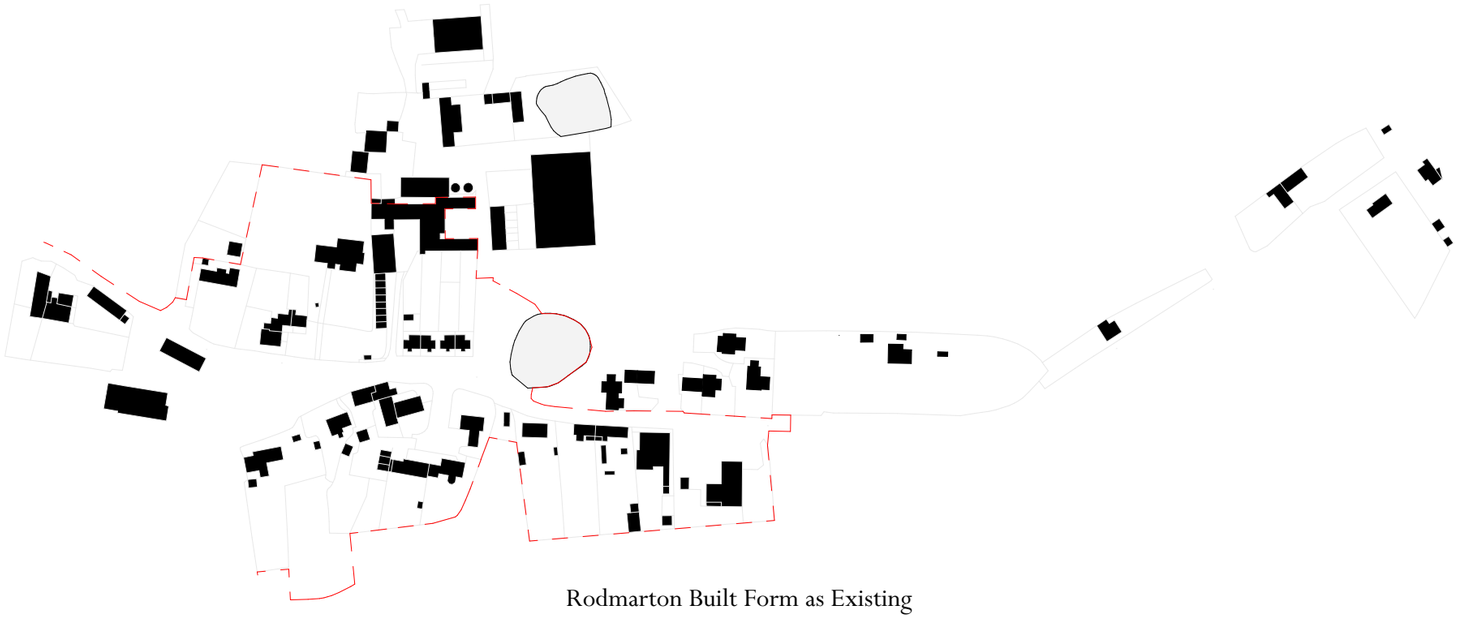
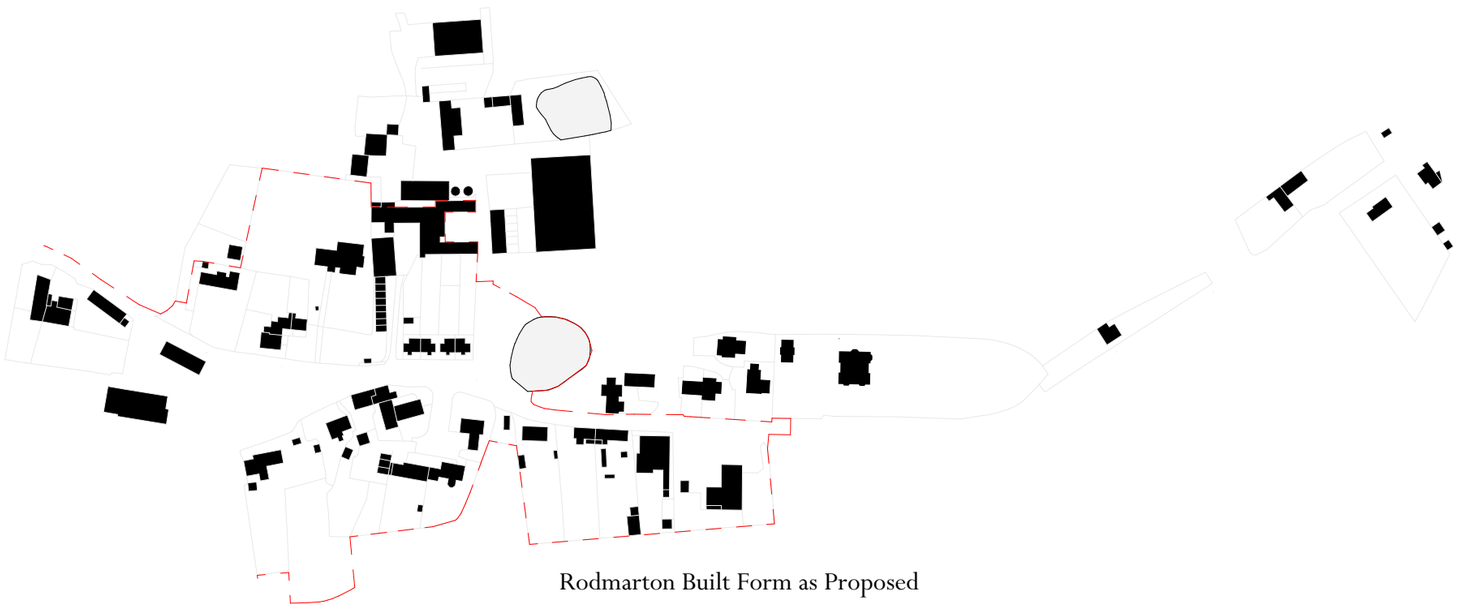
SITE ANALYSIS - RODMARTON BUILT FORM



Rodmarton Built Form as Existing



Rodmarton Built Form as Proposed

Outline of Conservation Area

0 50 100 150 200 250m

Scale 1:2500

Site Analysis - Rodmarton Built Form

Brook Close - Rodmarton Replacement House

Scale:1:2500 @ A3

Drawing Number: 6503-PL35 Rev | April 2025 | Drawn By: TF

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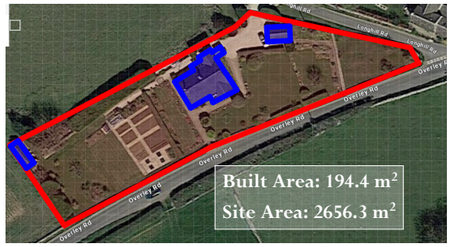
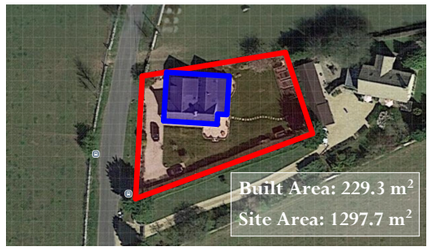
SITE ANALYSIS - COMPARATIVE OCCUPANCY PROPORTIONS

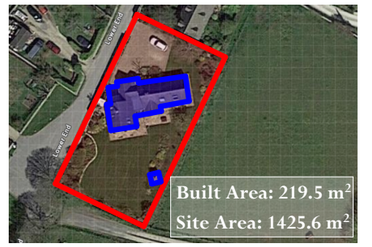
1. 11.7% - Nr. Daglingworth, within Daglingworth Conservation Area



2. 7.3% - Nr. Daglingworth, c.102m west of Daglingworth Conservation Area boundary



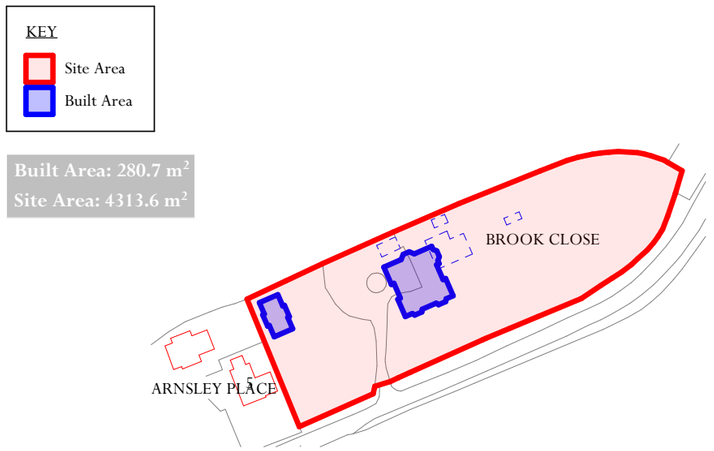
3. 17.7% - Nr. Frampton Mansell, sits directly south of Frampton Mansell Conservation Area boundary



4. 15.4% - Nr. Daglingworth, within Daglingworth Conservation Area

5. 4.1% - Nr. Tarlton, within the Talrton Conservation Area

6. 6.5% - Nr. Coates



0. 6.5% Brook Close

No.	What3Words	Site Area (m^2)	Built Area (m^2)	Occupancy of Building on Site (%)
1.	///shutting.sanded.innocence	1889.6	221.1	11.7
2.	///campus.corrosive.year	2656.3	194.4	7.3
3.	///slouched.boxer.moisture	1297.7	229.3	17.7
4.	///tonal.crisp.starting	1425.6	219.5	15.4
5.	///cave.etchings.boomer	9411.0	384.0	4.1
6.	///vanilla.helpful.snuck	5971.9	370.8	6.2
0.	**Brook Close Proposed**	4314.6	280.7	6.5

Site Analysis - Comparative Occupancy Proportions

Brook Close - Rodmarton Replacement House

Scale:1:1500 @ A3
Drawing Number: 6503-PL36 Rev | April 2025| Drawn By: UB

ADAM ARCHITECTURE
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Brook Close Rodmarton

High Level Comparative Whole Life-Cycle Carbon Assessment

ADAM ARCHITECTURE

October 2025

Contents

Project Name:	Brook Close, Rodmarton
Job no:	HP/6503
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Service group: Sustainability & Carbon Consultancy
Service: Sustainability Review & Whole Life Carbon Assessment

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1.0
Executive Summary

1.0 Executive Summary

1.1 Key Findings

In order to provide evidence on the carbon impact of development, this report presents a high-level assessment of whole life-cycle carbon (WLC) emissions associated with two development options for Rodmarton:

1. Retention and Retrofit: Retaining the existing dwelling and constructing an energy-efficient extension to meet the functional needs of the client's family
2. Demolition and New Build: Demolishing the existing dwelling and replacing it with a highly sustainable new home.

The assessment evaluates both embodied carbon (associated with construction materials, transport, and processes) and operational carbon (energy use over the building's lifetime), in alignment with the RICS Whole Life Carbon Assessment guidance. A projected lifespan of 60 years was adopted, consistent with early-stage design assumptions and standard benchmarking practice.

KEY FINDINGS:

1. Embodied Carbon Impact: As would be expected with a new-build, the demolition and new-build scenario results in higher upfront embodied carbon compared with the retrofit option, due to the carbon associated with new materials and construction activities.
2. Operational Carbon Savings: The new-build option is expected to deliver lower operational energy use through its up to data building design. Over the building's lifetime, these operational savings progressively offset the higher embodied carbon from new construction.
3. Whole Life Carbon Comparison: Preliminary analysis indicates that, over a 60-year lifecycle, the demolition and new-build option can achieve a net reduction in total carbon emissions compared with the retention and retrofit scenario. In its abition to meet a higher design standard of LETI 2030, the project should achieve an enhanced performance.
4. Carbon Payback Period: Results suggest a carbon payback period of approximately 16–34 years, after which the cumulative carbon emissions of the demolition and new-build option become lower than those of the retention and retrofit scenario. In meeting a higher design standard, the project should achieve a payback period of much closer to 16 years. This would be within a generation or less of a family living at the house.
5. Sustainability Alignment: The new-build approach aligns with the client's aspiration to achieve a higher level of environmental performance and long-term energy efficiency.

CONCLUSION:

The WLC assessment demonstrates that, despite higher initial embodied carbon, the proposed demolition and new-build option deliver superior carbon performance over the building's lifecycle when compared to retaining and retrofitting the existing structure. This supports the planning application's sustainability credentials and provides confidence that the proposed development achieves efficiency in both carbon and energy.

2.0
Context

2.0 Context

2.1 Legislative Context

In August 2025 a planning application for the demolition of existing dwelling and outbuildings and re-placement with a self-build dwelling, garage outbuilding, landscaping and associated ancillary works at Brook Close Rodmarton Cirencester Gloucestershire was submitted. This application was supported by a sustainability statement which set out the alignment of the proposal with:

- The National Planning Policy Framework's advice and requirements on sustainable development,
- The Cotswold District Local Plan (2011-2031) and its strategic vision for sustainable growth
- The Sustainability Appraisal Adoption Statement for the Cotswold District Local Plan (2011-2031),
- And the draft policies of the Cotswold District Local Plan.

The Sustainability Statement considers existing ulations, as well as the Future Homes Standard draft information.

It also sets out the ambitious alignment of the project with the targets set out in the LETI Climate Emergency Design Guide. These targets include limits on both operational and embodied energy.

Following the submission of the application, the Senior Conservation and Design Officer, Eleanor Ward, has submitted a formal response to the application which includes the following comment:

'The new development could bring planning benefits in mitigating climate change; however, the supporting information appears to rely on energy savings rather than energy and carbon efficiency. There would also be a loss of 'whole life carbon' through the demolition of the existing building, which if retained and energy and carbon efficiency adaptions made could achieve a similar or better result, whilst also avoiding its total loss of significance as a non-designated heritage asset. As Section 1.5 of Adapting Historic Buildings for Energy and Carbon Efficiency, Historic England's Advice Note 18 states 'The most sustainable building is one that already exists, because continued repair, maintenance, use and reuse of historic buildings voids unnecessary release of embodied carbon associated with materials, transport and processes required for demolition and new build'.

This report assesses the whole-life carbon emissions of two scenarios:

1. A first design option in which the existing building is retained and extended to create a home of a comparable scale which meets the needs of their family.
2. A second design option in which the existing building is demolished and replaced with a new low-carbon family home of exceptional design quality.

In so doing, the report aims to provide committee members with comfort that the proposal provides an overall carbon saving across the lifespan of the building when measured against a comparable alternative which includes the retention of the existing building.

In lieu of sufficient design strategy or evidence into the existing building condition, this report has assumed that within the first design option, any works done to the existing building are cosmetic, and would not affect the floor area or the historic features of the exisiting building, and therefore do not include any substantial works to the building fabric.

2.2 Scope of the WLC assessment

In order to better understand the comparative carbon emissions for either a retention of the existing dwelling within a new development, or the demolition of the existing dwelling to build a new development, an early-stage whole life-cycle carbon assessment has been undertaken with the ambition of understanding a range of time in which the new build development would outperform a retrofit option based on two different scenarios.

The existing house at Brook Close is two storeys, was originally built in the late 1930s and then fundamentally rebuilt in 1976. The overall gross internal floor area (GIA) of the dwelling is 137m². The current proposal seeks to demolish the existing dwelling and rebuild an exemplary sustainable new home based on the fact that this building has had its architectural merits eroded by the degree of extension and modification, not least that the present roof is in its third

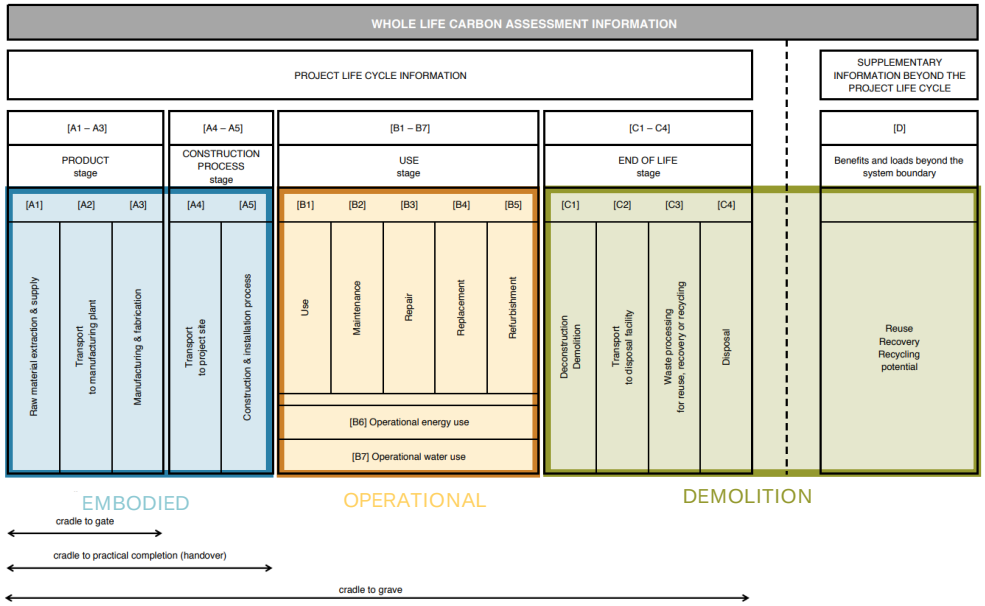


Figure 1. RICS Life cycle stages

configuration and although it has the sense of familiarity, it falls short of real merit and should not be considered to be a building of any great historic value.

The purpose of this WLC assessment is to explore the carbon impact of the proposed demolition and redevelopment, alongside testing alternative design approaches (Retrofit) which could result in being less carbon intensive. Ultimately, our aim is to provide the results from whole life carbon assessments for two design options at Brook Close under two different scenarios.

The main steps of the analysis can be summarised in the following list:

- Define the scenarios or design options to test
- Search for data and information to support calculations
- Account for operational and embodied carbon emissions
- Merge results in a Whole Life-Cycle Carbon chart which will provide a comparison between all design options and discuss alignment to RIBA and LETI benchmarks

The analysis adopts the Royal Institution of Chartered Surveyors (RICS) framework, covering stages A1 to D2 (Figure 3), and uses the recommended sixty (60) years as a typical projected lifespan. The study has been conducted in accordance with the 'LETI Unpicker Retrofit vs. rebuild: Unpicking the carbon argument' guidance, released in March 2023, and according to the 'RICS Whole life carbon assessment for the built environment' 2017 guidance. On a whole life basis, the assessment is complex and relies on many assumptions. Given the early stage of the project, benchmarks, case studies and typical figures from reliable guides have been used where data was missing and these have been set out in pages 13-14. The analysis can be refined as soon as more detailed information is available.

2.3 Physical & historic building characterisation

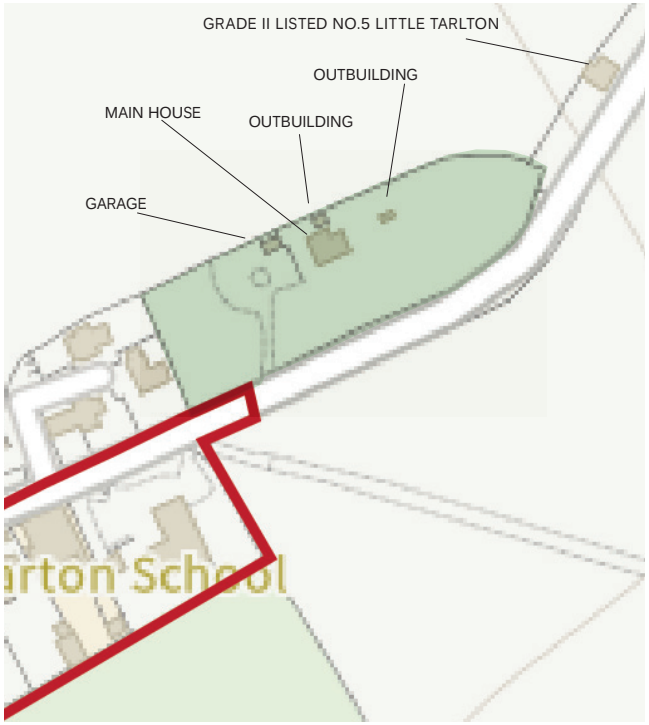


Figure 2. The Brook Close site highlighted in green, with the Conservation Area outlined in red.

Figure 3. View of the southern elevation of the main house

Brook Close is a detached, two-storey dwelling located on the eastern edge of the rural village of Rodmarton. Positioned centrally towards the rear of an approximately two-acre plot, the property is surrounded by gardens to the front and sides. The plot also contains a stone-built single garage and two outbuildings.

A gravelled parking area is situated to the west of the house, with vehicular access positioned towards the western end of the southern boundary. The plot is long and narrow, directly adjoining the main road that connects Rodmarton to the nearby village of Tarlton.

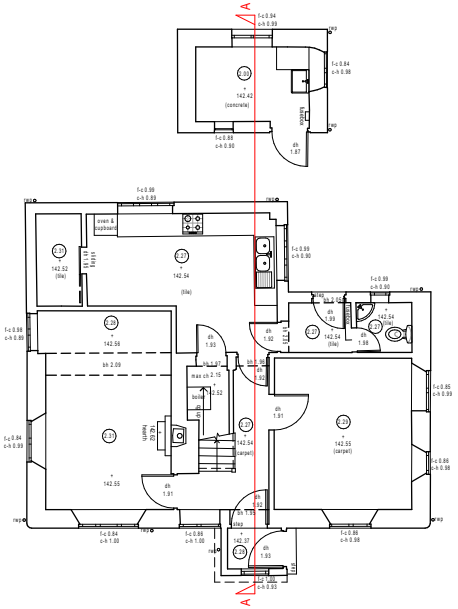
To the west, the site borders a development of five modern houses, while open countryside, including fields belonging to the Rodmarton Estate, extends to the north. Scattered dwellings lie to the east along the road, gradually giving way to open countryside.

The site is located within the Cotswolds National Landscape Area (formerly the Cotswolds AONB) and falls within the identified zone of influence for the Cotswold Beechwoods Special Area of Conservation (SAC) highlighted in red opposite. Additionally, the site is within the red impact zone for Great Crested Newts, highlighting its ecological sensitivity.

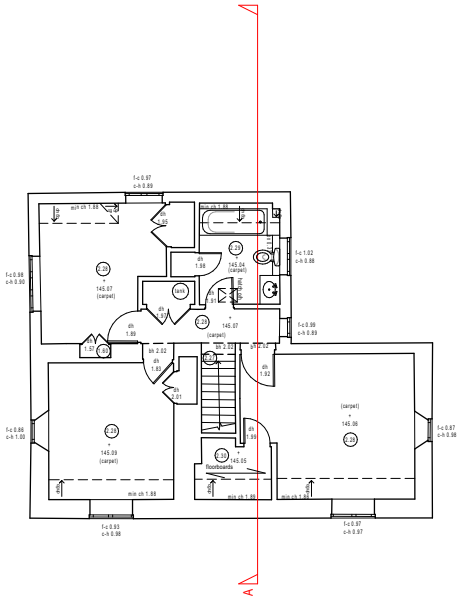
The property has been recognised as a non-designated heritage asset by the local council. While it is situated outside the Rodmarton Conservation Area, the boundary of the Conservation Area runs close to the site's vehicular access, southwest of the property. The closest Grade II listed buildings, including No. 5 Little Tarlton, are located approximately 83m and 174m to the northeast.

2.4 Floor plans and elevations - existing

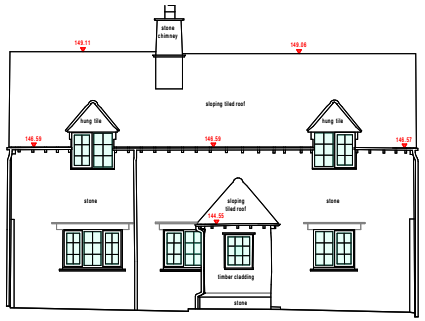
Ground Floor



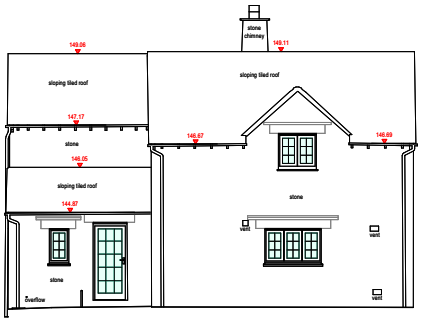
First floor



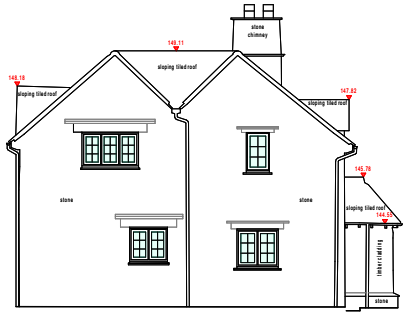
South Elevation



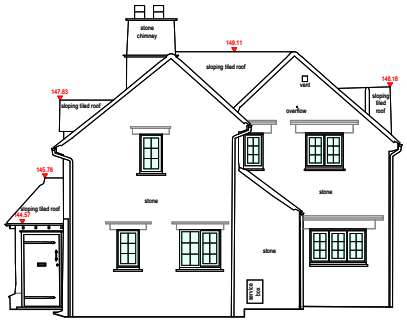
North Elevation



West Elevation

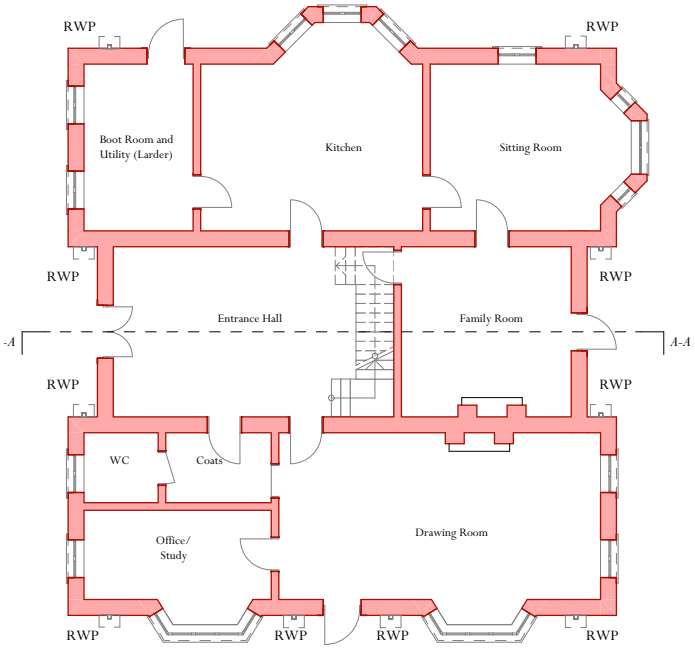


East Elevation

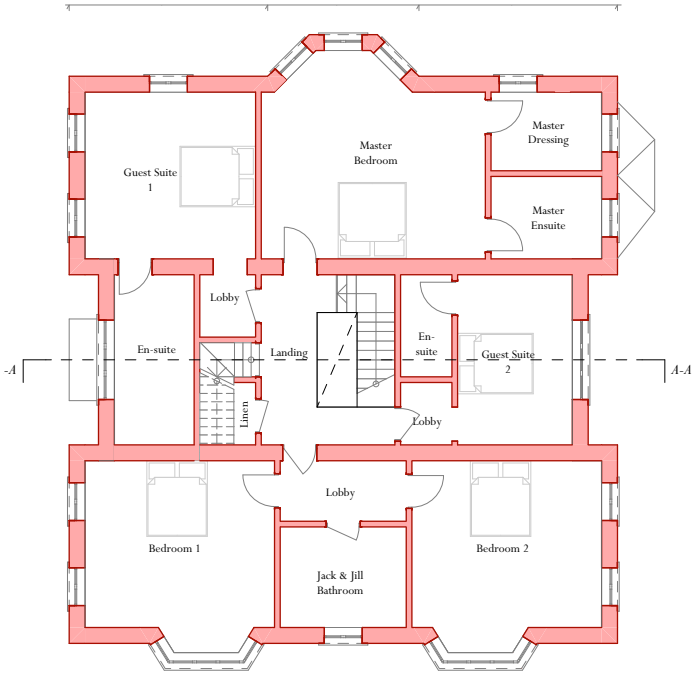


2.5 Floor plans and elevations - proposed

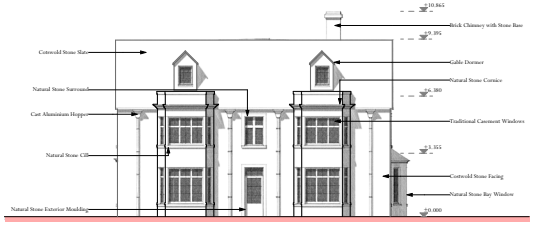
Ground Floor



First floor

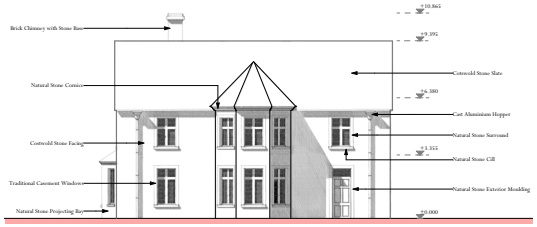


South Elevation



West Elevation

North Elevation



East Elevation

3.0
Whole Life-Cycle Carbon assessment (by ADAM Architecture)

3.0 Whole Life-Cycle Carbon assessment

3.1 Design options

Figure 4. Option 1 - Retention of existing, with minor interventions which preserve existing proportions, and,
- Notional extension which accomodates client's needs for a funtional family home.

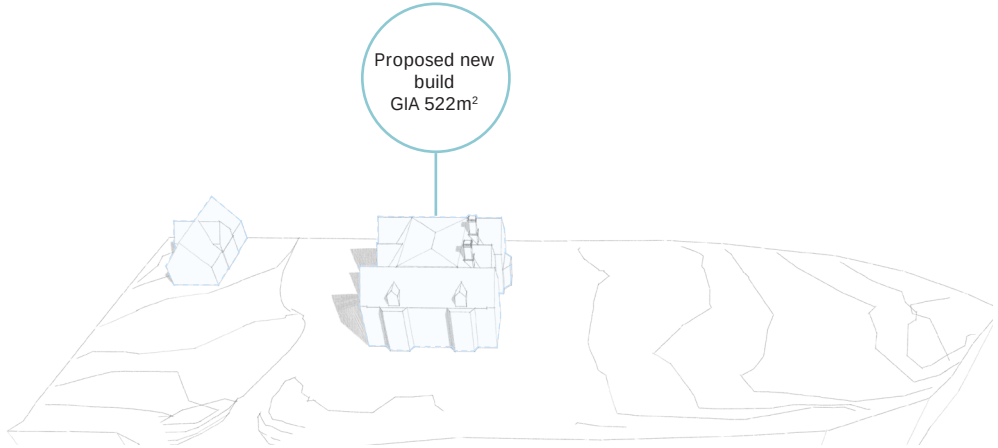


Figure 5. Option 2 - Proposed new build as described in application ref. 25/02458/FUL.

Two design options have been assessed: The ŬVWRSWLRQs a study which includes the retention of the existing building. In order to provide a comparable alternative to the proposal set out in this application, a notional extension is included which ensures that this option preserves the embodied carbon within the existing structure while accommodating future functional needs. The second option calculates the performance of the design proposed within application ref. 25/02458/FUL and therefore involves the demolition of the existing building and the construction of a new replacement building designed to meet higher performance targets. The total Gross Internal Areas (GIA) associated with both options are equal in order to provide a reasonable comparison.

In order to provide a likely range of time in which the new dwelling would reach its payback period, two performance scenarios have been evaluated for each design option:

- Scenario 1 represents compliance with current ulations, referencing the RIBA 2025 operational energy and carbon targets as a benchmark. This is the minimum standard required to be achieved by any new-build.
- Scenario 2 aspires to achieve a higher performance level, aligned with the LETI 2030 standards, reflecting the client's ambition to deliver a low-carbon, future-proof development. This higher-performance scenario is consistent with the sustainability objectives outlined in the project's Sustainability Statement and demonstrates a proactive approach towards meeting long-term net zero carbon goals.

3.2 Embodied carbon - model inputs

Given the early design stage, embodied carbon figures have been estimated on a complex set of assumptions. RIBA's 'Business as usual' benchmark (1200 $kgCO_2$ e/m^2) has been used to round the embodied carbon of the existing building, while the RIBA '2025 Target' benchmark (800 $kgCO_2$ e/m^2) and LETI '2030 Target' benchmark (450 $kgCO_2$ e/m^2) to estimate the new build embodied carbon. The breakdown of the total embodied carbon at different stages has been based on Figure 9 of the LETI Carbon Primer guide. Tables 1 & 2 summarise below the full set of assumptions.

		Demolition	Upfront (A1-A5)	In use (B1-B5)	End of Life (C1-C4)
Scenario 1 (meeting RIBA 2025 benchmark)	Option 1 (retain existing)	N.A	Repair and maintenance carried out in the existing based on the RIBA '2025 Target' (592$kgCO_2$ e/m^2) New extension built based on same benchmark (RIBA 2025)	Based on the RIBA '2025 Target' (200$kgCO_2$ e/m^2)	Based on the business-as-usual benchmark (12 $kgCO_2$ e/m^2)
	Option 2 (new build)	Based on the business-as-usual benchmark (12 $kgCO_2$ e/m^2)	Based on the RIBA '2025 Target' (800 $kgCO_2$ e/m^2), including Upfront, In-Use and End of Life		
Scenario 2 (Achieving LETI standard)	Option 1 (retain existing)	N.A	Repair and maintenance carried out in the existing using low carbon materials based on the LETI '2030 Target' (333 $kgCO_2$ e/m^2) New extension built following same benchmark (LETI 2030)	Based on the LETI '2030 Target' (112.5 $kgCO_2$ e/m^2)	Based on the business-as-usual benchmark (12 $kgCO_2$ e/m^2)
	Option 2 (new build)	Based on the business-as-usual benchmark (12 $kgCO_2$ e/m^2)	Based on the LETI '2030 Target' (450$kgCO_2$ e/m^2), including Upfront, In-Use and End of Life		

Table 1 Assumptions explained

		Demolition	Upfront (A1-A5)	In use (B1-B5)	End of Life (C1-C4)	Total
Scenario 1	Option 1	N.A.	487	200	9	696
	Option 2	3.1	592	200	8	803
Scenario 2	Option 1	N.A.	274	113	6	392
	Option 2	3.1	333	113	5	451

Table 2. Summary of inputs for embodied carbon

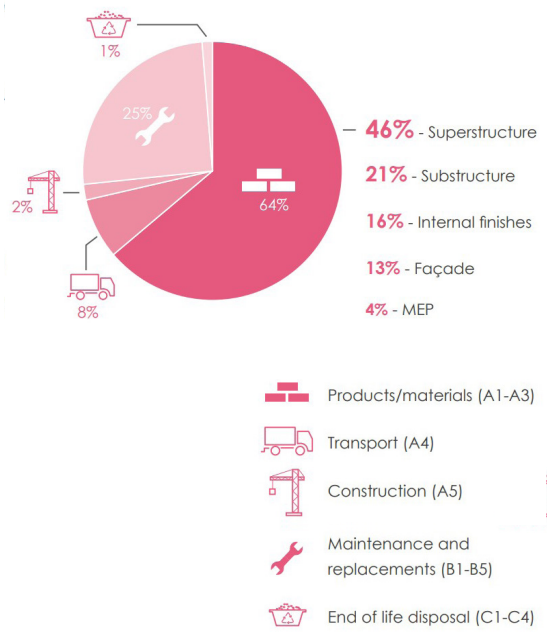


Figure 6. Breakdown of embodied carbon by stages

3.3 Operational energy - model inputs

Scenario 1 : Meeting s

Option 1

The annual operational energy for the existing building follows the LETI Retrofit Guide for existing detached buildings (165 kWh/m²), assuming only minor fabric upgrades due to heritage constraints. The notional extension is assumed to meet current ulations, with an estimated energy use of 60 kWh/m² (RIBA 2025 benchmark for residential buildings).

Option 2

The new replacement building is assumed to meet current ulations, with an estimated energy use of 60 kWh/m² (RIBA 2025 benchmark for residential buildings).

Scenario 2: achieving higher industry standard (LETI 2030)

Option1

The annual operational energy for the existing building follows the LETI Retrofit Guide for existing detached buildings (165 kWh/m²). The extension is assumed to meet LETI 2030 performance targets for residential buildings, with an estimated energy use of 35 kWh/m².

Option 2

The new replacement building is assumed to meet LETI 2030 performance targets for residential buildings, with an estimated energy use of 35 kWh/m².

Annual operational Energy (kWh/m²)					
			Benchmark	Energy use	Energy use on overall GIA
Scenario 1 (meeting RIBA 2025 benchmark)	Option 1 (retain existing)	Retained	LETI Retrofit existing Detached	165	87.5
		Extension	RIBA 2025	60	
	Option 2 (new build)	New build		60	60
Scenario 2 (achieving LETI Standard)	Option 1 (retain existing)	Retained	LETI Retrofit existing Detached	165	69
		Extension	LETI 2030	35	
	Option 2 (new build)	New build		35	35

Table 3. Summary of inputs for operation energy emission

PV Generation

The client has expressed a strong aspiration to integrate photovoltaic (PV) panels wherever feasible as part of the project's sustainability strategy. In response, the design team has optimised the roof configuration to maximise the available area for roof-mounted PV installations without compromising aesthetic aspects. The inclusion of PV systems supports the project's objective of reducing operational carbon emissions and enhancing on-site renewable energy generation. However, in accordance with the RICS Whole Life Carbon Assessment for the Built Environment methodology, the energy generation from PV panels is not included within the Whole Life Carbon (WLC) calculation. This approach ensures that the assessment reflects only the embodied and operational impacts of the building itself, independent of potential renewable energy offsets.

3.4 Embodied carbon - calculations

The following graph summarises the overall embodied carbon emissions ($kgCO_2e$) for the two design options under the two assessed scenarios. These graphs represent the carbon emissions produced in the acquisition and use of materials to build, maintain and eventually demolish the buildings. This does not include the emissions produced in the use of the building.

Under both scenarios, **Option 2 (Demolish and New Build)** demonstrates **higher** embodied carbon emissions compared to **Option 1 (Retain and Extend)**. This is primarily due to the carbon impact associated with new construction materials and processes, whereas the retention strategy preserves much of the existing building's embodied carbon.

When comparing the two performance scenarios, the results indicate that adopting higher standards such as LETI 2030 can lead to a reduction of over 40% in total embodied carbon emissions. This improvement is observed in both design options, highlighting the substantial benefits of low-carbon materials in achieving long-term carbon reduction goals.

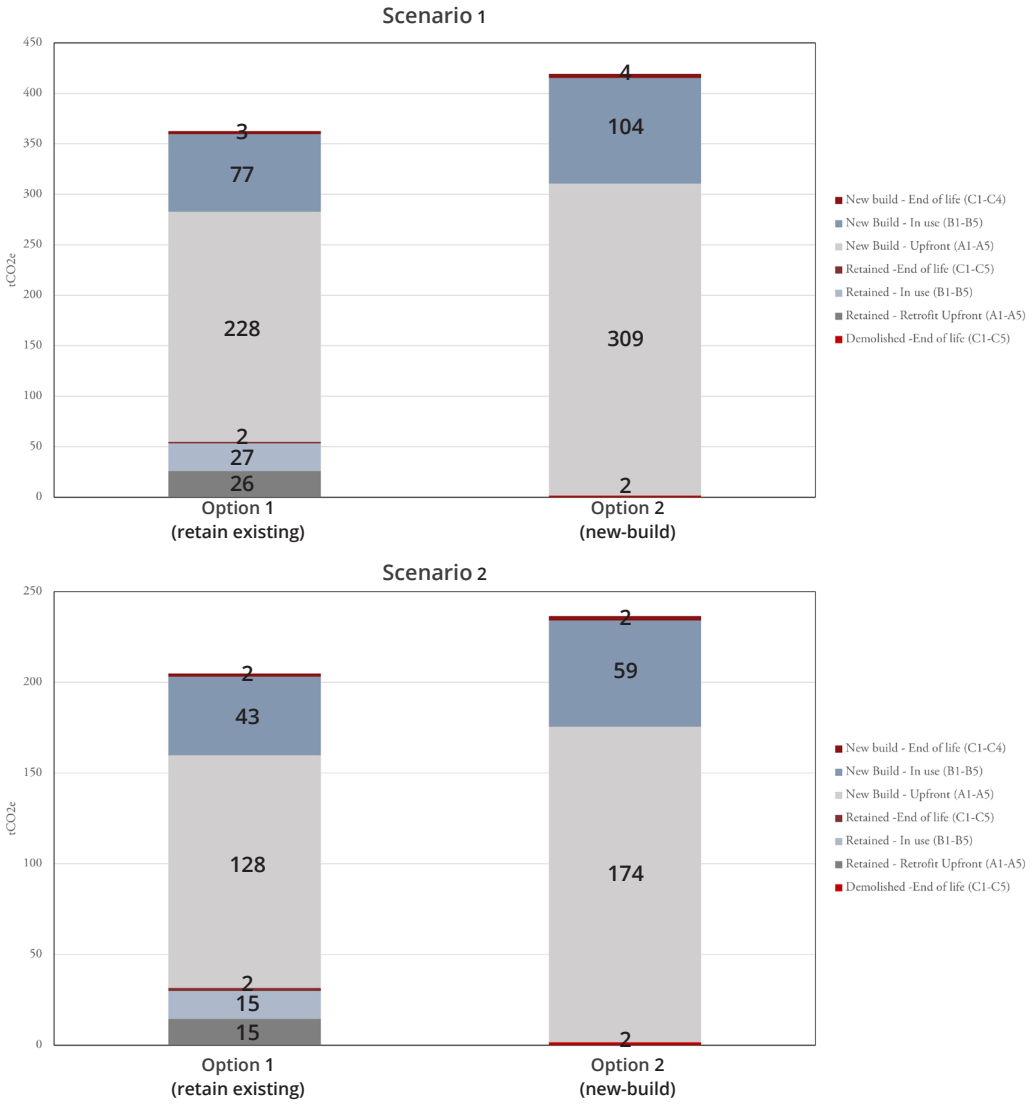
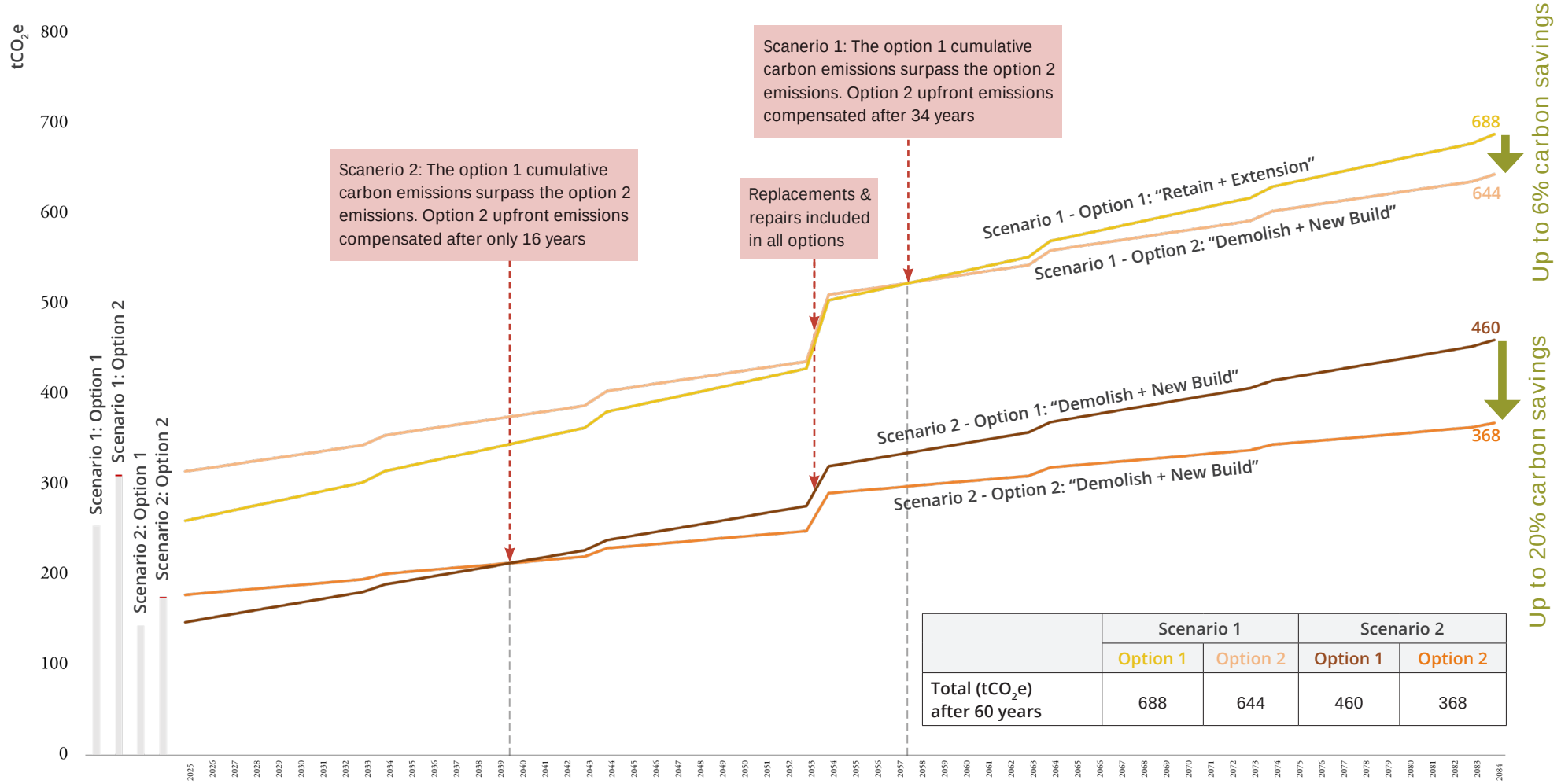


Figure 7. Whole Life Embodied carbon results for the two scenarios

3.5 Whole Life-Cycle Carbon chart - Embodied & Operational

The following chart summarises the overall whole life-cycle carbon emissions (tCO_2e) of two design options under the two scenarios:



	Scenario 1		Scenario 2	
	Option 1	Option 2	Option 1	Option 2
Total (tCO_2e) after 60 years	688	644	460	368

3.6 Discussion of Results

The **Whole Life-Cycle Carbon chart** provides a concise summary on the carbon assessment of two options during a 60 years life cycle. It serves as an illustrative tool that enables a direct comparison between the two design options: Option 1 – "Retain + extension" and Option 2 – "Demolish + New Build." On the left-hand side of the chart, the vertical bars represent the embodied carbon associated with materials, construction, and replacements, while the slanted line illustrates the operational carbon emissions over the building's lifespan, including repairs and maintenance.

This visual representation allows for a clear comparison of the overall carbon impact of both options under the two assessed design scenarios. The results provide evidence that the proposed application delivers an **overall carbon saving** across the building's **life cycle** when measured against the alternative, while demonstrating the carbon advantage of complete demolition and reconstruction over retaining and upgrading the existing structure.

The results demonstrate that although the **Demolish and New Build** option exhibits a **higher** level of **upfront embodied carbon**, this difference can be gradually offset by the **operational carbon savings** achieved through improved energy efficiency. The analysis indicates a carbon **payback period** of approximately **16–34 years**, with the shorter end of this range (around 16 years) being more likely given the project's aspirations to achieve higher energy performance standards.

It is important to note that the benefits of **photovoltaic (PV) generation** have not been included in this Whole Life Carbon assessment, as the study focuses solely on the building itself in accordance with RICS methodology. However, with the integration of PV systems, additional operational carbon reductions would be realised, meaning that the embodied carbon payback period could occur **earlier than projected**, further strengthening the case for enhanced energy performance measures.

When we look at the end-of-life total emissions emitted by the two options, demolish + new build (**Option 2**) is projected to emit carbon emissions at lower rate, estimated between **705-1233 tCO_2e** at the end of life. This result suggests that the carbon and energy savings associated with the efficient operational energy of the new build are sufficient to offset the high upfront carbon emissions due to demolition works and new build.

In summary, the Whole Life Carbon assessment demonstrates the trade-off between embodied and operational carbon across the two design options and performance scenarios. **Option 1 – Retain and Retrofit** performs **better** in terms of **upfront embodied carbon** due to the reuse of existing structures and materials, while **Option 2 – Demolish and New Build** delivers **superior operational energy performance**. Over the building's lifespan, the **enhanced energy efficiency** of the new build is projected to **offset** its **higher upfront carbon** impact, achieving a **carbon payback period** of approximately 16–34 **years**. With the project's commitment to **higher standards,** it is highly likely this will result in a **shorter payback period** - far closer to 16 years - and **larger carbon saving** protential. Although photovoltaic **(PV) generation** has not been included in the assessment, its integration would further **shorten the payback period** and strengthen the project's long-term carbon performance. Overall, the results highlight the **carbon benefits** of the **Demolish and New Build option** compared to the Retain and Extend option.

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