



Sam Grant  
Bath & North East Somerset Council  
Lewis House  
Manvers Street  
Bath  
BA1 1JG

By email only to: [Sam\\_Grant@BATHNES.GOV.UK](mailto:Sam_Grant@BATHNES.GOV.UK) and [development\\_management@bathnes.gov.uk](mailto:development_management@bathnes.gov.uk)

18 June 2021

Dear Sam

**APPLICATION NO:** 20/03392/FUL

**DESCRIPTION:** Convert a redundant farm building into an agriculturally tied dwelling to house a farm worker.

**LOCATION:** Barn North of Village Hall, Langridge Lane, Langridge, Bath

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, which is for a proposed development within the Cotswolds National Landscape.

The Board recognizes the contribution that farming makes to conserving and enhancing the natural beauty of the Cotswolds National Landscape. We also recognise that providing appropriate accommodation for farm workers is an important component of ensuring the viability of farm businesses. Furthermore, we acknowledge that the need for a farm worker's dwelling has been accepted by Bath and North East Somerset Council in this instance.

However, it is important that the provision of such accommodation is delivered in a way that is compatible with – and positively contributes to – the purpose of AONB designation. In this instance, for the reasons outlined below, we do not consider this to be the case. In addition, we consider that there may be scope for identifying more suitable, alternative locations for the farm workers dwelling.

On this basis, we object to the proposed development and recommend that planning permission should be refused.

#### Landscape and visual impact

The building is located in an open and exposed setting on Lansdown plateau and is clearly visible from multiple, publically accessible locations, appearing on the skyline in many of these views. As such, changes to the building have the potential to adversely affect the natural beauty of the Cotswolds National Landscape in this locality.

Two key issues are:

- Domestication of the agricultural landscape and existing agricultural character.
- Introduction of 'lit elements' into characteristically dark, night-time landscapes.

With regards to 'domestication', we consider that the proposed retention of agricultural form and appearance would help to reduce the magnitude of change, with these adverse effects being

#### **Cotswolds Conservation Board**

The Old Prison, Fosse Way, Northleach  
Gloucestershire GL54 3JH  
01451 862000  
[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

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

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

relatively localised. Overall, we consider that the proposed development would have a 'minor adverse' landscape and visual impact in this regard.

However, we consider that the appearance of the building, in its current state, detracts from the natural beauty of the area. If a suitable, alternative location was found for the farm worker's dwelling, we would recommend that this redundant building should be removed.

With regards to the introduction of lit elements, we consider that the extensive glazing on the east elevation and the sky lights would allow a considerable amount of light to be emitted from the proposed dwelling. Combined with the exposed and elevated setting of the site, we consider that this would result in a significant adverse effect in this regard.

#### Implications of proposed mitigation measures

We consider that the proposed tree planting would not be appropriate as it would not be consistent with the local landscape character and would adversely affect the characteristic open, panoramic and long distance views.

With regards to the proposed hedge planting along the footpath adjacent to the building, we consider that the potential benefits would be outweighed by the benefits of retaining the eastward views from the footpath. We therefore recommend that the proposed hedge planting along the footpath should not be implemented (or, alternatively, should be implemented at a much reduced scale, such as just between Langridge Lane and the building).

#### Location

A potentially over-riding consideration is the policy requirement for essential dwellings for rural workers to be sited within a hamlet or existing group of buildings. This aligns well with the guidance in the Cotswolds AONB Landscape Strategy & Guidelines, which states '*avoid conversion of isolated farm buildings*'.

We disagree with the applicant's presumption that building a new farm worker's dwelling elsewhere would have more significant adverse impacts than the proposed development. We consider that building a new well-designed dwelling, in the local Cotswold vernacular, in a less exposed and prominent location within a hamlet or existing group of buildings, could potentially provide a more appropriate option.

If you have any queries regarding this response, please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

John Mills  
**Planning & Landscape Lead**  
[john.mills@cotswoldsaonb.org.uk](mailto:john.mills@cotswoldsaonb.org.uk) | 07808 391227

## APPENDIX 1. SUPPORTING INFORMATION

### Impacts on landscape and scenic beauty

#### Context

The farm building is located in Landscape Character Type (LCT) 9 (High Wold Dip Slope).<sup>1</sup> More specifically, it is located in Landscape Character Area (LCA) 9C (High Wold Dip Slope – Lansdown). The vicinity of the building exhibits a number of characteristic features of this LCT / LCA including: the gently undulating plateau; large, open arable fields with little tree cover and few hedgerow trees; open, panoramic and long distance views; and a sense of elevation and exposure. The high degree of inter-visibility makes it a landscape that is particularly sensitive to development.

The farm building is the only noticeable building in the local vicinity. It is in a very exposed position and is seen on the skyline from multiple publically accessible viewpoints.<sup>2</sup> Combined with the expansive views that are characteristic of this landscape, this means that the building is highly conspicuous and prominent. We therefore strongly disagree with the applicant's assertion to the contrary. Any changes to the building could *potentially* have significant adverse impacts.

However, we acknowledge the applicant's 'fundamental design objective' of adopting a design approach that retains the agricultural form and appearance of the existing building. We also acknowledge the applicant's assertion that the proposal involves no extension of the building beyond its existing footprint or physical fabric.<sup>3</sup>

These measures should help to reduce the magnitude of change and reduce potential adverse effects. However, it is worth noting that the building is arguably a detracting feature in the landscape, particularly given the rusty appearance of the roof (when viewed on Street View on Google Earth). As such, having an objective that, in effect, seeks to maintain the status quo, in terms of the appearance of the building, can hardly be classed as conserving the natural beauty of the locality and certainly not enhancing it.

The Cotswolds AONB Landscape Strategy & Guidelines<sup>4</sup> for LCT 9<sup>5</sup> identifies potential adverse landscape implications associated with isolated development (Section 9.2) and the conversion of farm buildings to new uses (Section 9.3). Relevant landscape implications include:

- Domestication of the agricultural landscape and existing agricultural character.
- Introduction of 'lit' elements to characteristically dark landscapes.

These issues are addressed in more detail below.

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<sup>1</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>.

<sup>2</sup> These viewpoints include along a 800m+ length of the adjacent footpath, the footpath approximately 200m to the north-east, the Cotswold Way approximately 800m to the north, a 1.5km+ length of Lansdown Road approximately 150m to the west, and the west end of Langridge Lane approximately 250m to the south.

<sup>3</sup> It would be helpful if the applicant could provide 'plans and elevations' that include the dimensions of the current and proposed buildings.

<sup>4</sup> <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-strategy-guidelines/>

<sup>5</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>

## Domestication

Section 7.3.3 of the applicant's Planning, Design and Access Statement (PDAS) asserts that the building will continue to read as an agrarian structure and the residential use will not become apparent until users of the adjacent footpath are very close to the site.

Based on the information provided in Section 3.2 of the PDAS and in the Proposed Plans and Elevations, we are inclined to agree with this statement, although the south elevation potentially has an overly 'domesticated' appearance. There is also a risk that the glazing on this south elevation might result in the reflection of sunlight off these surfaces, known as the 'heliographic effect', which could intrude into views looking towards the building from the south.<sup>6</sup>

It is unlikely that the domesticated appearance would be discernable by users of Lansdown Road or Langridge Lane, who would predominantly be passing at relatively high speed in motor vehicles.

The only other location where the domestication of the building might be apparent to a significant degree is the footpath to the east of the building, with Figure 4 of the PDAS showing clear inter-visibility between the building and the footpath. However, given that the footpath is at a lower elevation than the building, the proposed hedging would potentially mitigate this impact to a satisfactory degree. The key issue, with regards to the east elevation would potentially be the extensive glazing. This could result in the reflection of sunlight of these surfaces, on sunny mornings, which could potentially intrude into views a considerable distance away.

There are a number of potential features that could add to the domestication of the property, including ornamental features, planting and washing lines, for which the likely impact is hard to predict.

Overall, we consider that the conversion would result in a degree of domestication of an agricultural building, which we would consider to be an adverse effect. However, the extent to which this domestication would be experienced by receptors in the locality would mainly be limited to the close vicinity of the barn. As such, we consider this to be a minor adverse effect.

## Introduction of lit elements into characteristically dark landscapes

The dark skies of the Cotswolds National Landscape are one of the area's 'special qualities'. In other words, these dark skies are one of the key attributes on which the priorities for the area's conservation, enhancement and management should be based. The issue of dark skies is addressed in Policy CE5 of the Cotswolds AONB Management Plan and in the Board's Dark Skies & Artificial Light Position Statement.<sup>7</sup>

A key consideration, with regards to the issue of dark skies, is the introduction of 'lit elements' into characteristically dark (night-time) landscapes (i.e. new lighting that would be visible from a considerable distance, even if it is not necessarily causing light pollution, per se).

The building is in a relatively isolated location with no other sources of lit elements in the immediate vicinity. The building is also in an open, exposed and elevated location. As such, any light that is emitted from within the building and from external lighting on the property would appear as an incongruous lit element from considerable distances away.

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<sup>6</sup> The issue of the 'heliographic effect' is addressed in Section 5.2 of the Board's Tranquillity Position Statement ([link](#)), which specifies that measures should be taken to avoid or minimise the reflection of sunlight off surfaces.

<sup>7</sup> Cotswolds Conservation Board (2019) *Dark Skies & Artificial Light Position Statement* ([link](#)).

This is demonstrated by the visual panorama software image in Appendix 2, which shows that light emitted from the property could, theoretically, be seen from up to 75km away. More locally, this lighting would appear prominently as an incongruous lit element for users of the A46 and residents of the local hamlets, for example.

The issue of lighting from the property appearing as an incongruous lit element in the dark night-time landscape is a significant cause for concern for the Board.

The issue of 'sky glow' is also an issue of potential concern. The Proposed Plans and Elevations indicate that the converted building would have sky lights. These would potentially allow light from within the building to be emitted directly into the night sky. This light pollution would be exacerbated by the open, exposed and elevated position of the building. From the Proposed Plans and Elevations it appears that the windows would allow sufficient sunlight into the rooms. This calls into question the need for the sky lights.

For these reasons (and without prejudice), we recommend that, if planning permission is granted, the design should be changed such that:

- the area of glazing on the east elevation should be substantially reduced;
- the design should not include sky lights.

### **Implications of the proposed mitigation measures**

The applicant proposes a number of landscaping measures to provide additional screening to the application site and additional visual enhancement. This includes pockets of broadleaved tree planting in the immediate vicinity of the building as well as 622m of hedgerow planting.

As outlined above, the characteristic features of LCT 9 include: large, open arable fields with little tree cover and few hedgerow trees; wide, panoramic and long distance views; and a sense of elevation and exposure. The lack of tree cover is a significant, positive contributing factor to these views and to the sense of exposure.

As such, the proposed tree planting would not be compatible with these characteristic features. Not only would it be contrary to the characteristic feature of 'little tree cover', it would also: (i) reduce the sense of openness and exposure; and (ii) restrict the wide, panoramic and long distance views.

For these reasons we do not think that the proposed tree planting would be appropriate.

Hedgerows are a characteristic feature of LCT 9. However, the extent of hedgerows in the immediate vicinity of the building is currently quite limited. As such it could potentially be argued that the planting of 622m of hedgerows would provide a beneficial effect for the landscape character (and biodiversity) of the area.

However, the proposed hedgerow planting is directly adjacent to – and on the east side of – the footpath that runs alongside the building. People using this footpath currently have open, extensive and panoramic views looking eastward across Lam Brook Valley towards Charmy Down. If the hedgerow planting is implemented, it is highly likely that these views would be blocked by the new hedgerow, along the 500m+ of this path where hedgerow planting is proposed.

The hedgerows could potentially be intensively managed in order to keep these views open. However, this intensive management would significantly reduce the potential biodiversity benefits of the hedges.<sup>8</sup>

Furthermore, the north-south alignment of the proposed hedge means that the extent to which it would screen the development from publically accessible viewpoints would be minimal.

On balance, in the context of this landscape setting and the proposed development, we consider that the potential benefits provided by hedge planting alongside the footpath would be outweighed by the benefits of retaining the unimpeded eastward views from the footpath. As such, we recommend that the proposed hedge planting should not be implemented. Alternatively, it should be implemented at a much reduced scale (for example, just along the section of the footpath between Langridge Lane and the building).

## Location

A requirement of Policy RE4 of the Bath & North East Somerset Core Strategy & Placemaking Plan is that '*essential dwellings for rural workers*' must be sited within a hamlet or existing group of buildings.<sup>9</sup> This aligns well with the guidance in the Cotswolds AONB Landscape Strategy & Guidelines, which states '*avoid conversion of isolated farm buildings*'.<sup>10</sup>

These are potentially an over-riding considerations that weigh the planning balance heavily in favour of refusing planning permission. It is worth noting that development that is not consistent with the Cotswolds AONB Landscape Strategy & Guidelines is, by extension, not consistent with the policies of the Cotswolds AONB Management Plan 2018-2023.

The applicant asserts that Policy RE4 criteria, referred to above, does not apply in this case '*as the dwelling is to be provided through the conversion of an existing farm building*'.<sup>11</sup> We do not consider that this provides an adequate reason for not fulfilling the criteria. The criteria is not dis-applied just because the applicant wants to provide a dwelling somewhere else.

The applicant also asserts that '*development involving the construction of a new house on greenfield land would inevitably cause greater visual intrusion*' than the proposed conversion of the agricultural building. However, we do not necessarily think that this is the case. For example, a new dwelling that is located within a hamlet or existing group of buildings in a less visually intrusive location (for example, off Lansdown plateau) and which is designed in the local Cotswold vernacular with high architectural quality and integrity, could potentially have a less harmful effect than the proposed conversion.

This is a particularly important consideration with regards to the introduction of lit elements into the dark, night-time landscape. The visual impact (and the impact on dark skies) of a new dwelling in a more sheltered location would be significantly less than for the proposed development, in this context.

The planning application states that the building is a redundant farm building. Presumably, given this redundant status, if a suitable site for the dwelling was found elsewhere, there would no longer be a

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<sup>8</sup> To manage a hedgerow for wildlife, the hedge should only be trimmed every two or three years, in rotation, and should not be cut during peak bird nesting season, which runs from March to September. Any maintenance work should, ideally, be delayed until January or February to allow autumn berries to fruit. ([Link](#)).

<sup>9</sup> [https://beta.bathnes.gov.uk/sites/default/files/2020-02/cs\\_pmp\\_vol\\_1\\_district-wide\\_compressed.pdf](https://beta.bathnes.gov.uk/sites/default/files/2020-02/cs_pmp_vol_1_district-wide_compressed.pdf)

<sup>10</sup> <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-9-high-wold-dip-slope-2016.pdf>.

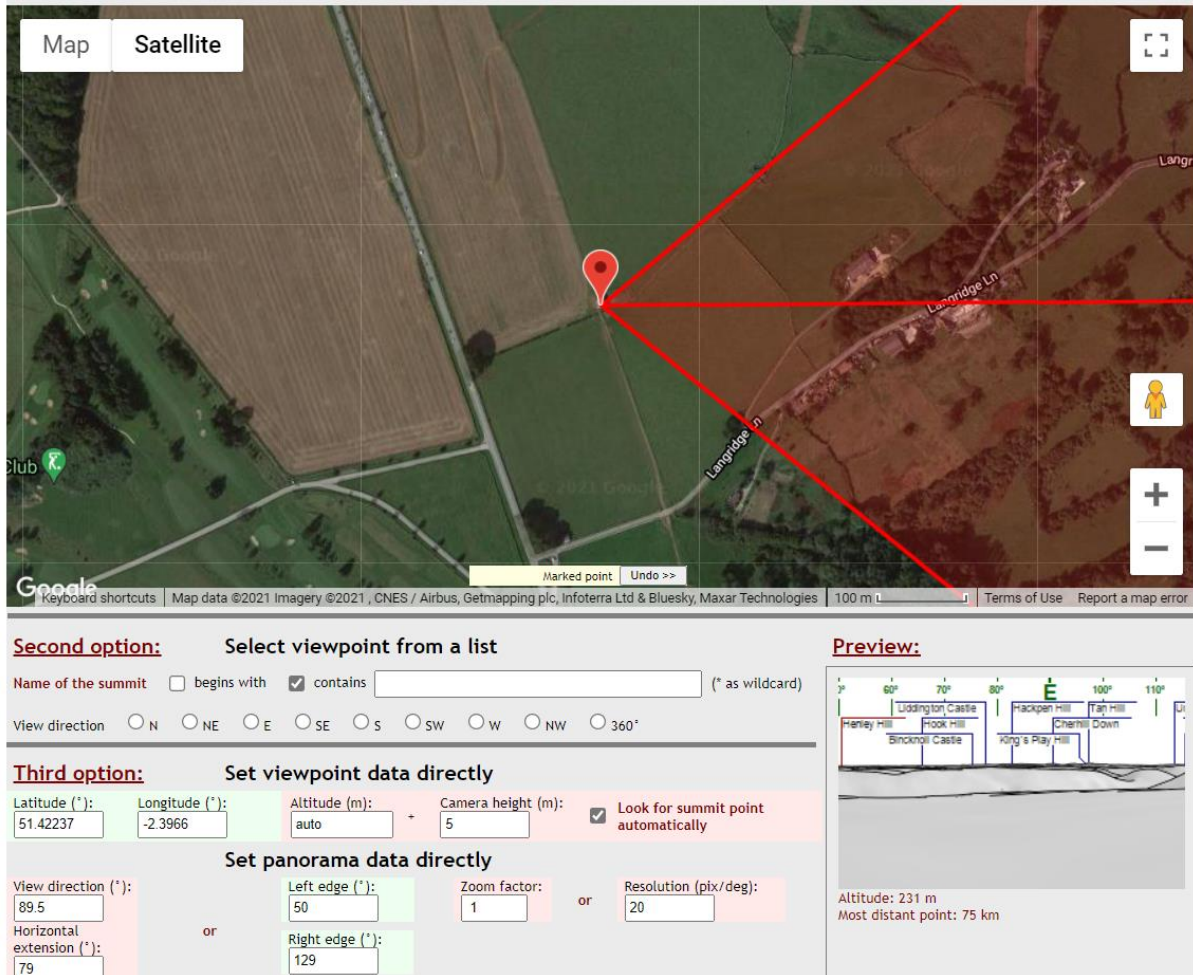
Section 9.2.

<sup>11</sup> Planning, Design & Access Statement. The table under paragraph 7.1.2.

need for the building. If this was the case, we would recommend that the building should be demolished and the land reinstated to agriculture. This would enhance the open views that are characteristic of this setting

## APPENDIX 2. DISTANCE FROM WHICH THE PROPOSED DEVELOPMENT COULD POTENTIALLY BE SEEN

The information presented below uses visual panorama software from the Ulrich Deuschle website ([https://udeuschle.de/panoramas/makepanoramas\\_en.htm](https://udeuschle.de/panoramas/makepanoramas_en.htm)). This indicates that light emitted through windows in the east elevation of the building, for example, could, in theory, be seen up to approximately 75km away (i.e. in the North Wessex Downs AONB, well beyond the boundary of the Cotswolds National Landscape).



The screenshot shows a Google Maps interface with a satellite view. A red pin is placed on a building, and a red line extends from it towards the right, indicating a view direction. The map shows a rural area with fields and roads. Below the map is a control panel with three options for setting viewpoint data.

**Second option: Select viewpoint from a list**

Name of the summit  begins with  contains  (\* as wildcard)

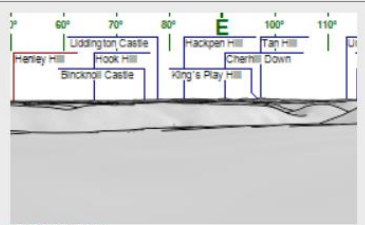
View direction  N  NE  E  SE  S  SW  W  NW  360°

**Third option: Set viewpoint data directly**

Latitude (°):  Longitude (°):  Altitude (m):  + Camera height (m):   Look for summit point automatically

View direction (°):  or Left edge (°):  Right edge (°):  Zoom factor:  or Resolution (pix./deg):  Horizontal extension (°):

**Preview:**



Altitude: 231 m  
Most distant point: 75 km