

10th January 2020

Patrick Jackson
Case Officer
South Gloucestershire Council

By email only to Patrick.Jackson@southglos.gov.uk

Dear Patrick



P19/15308/F | Relevant demolition of 1 no. modern barn, 2 no. silos and 1 no. outbuilding. Erection of single storey rear extension to 1 no. barn (Short Barn) to facilitate conversion of 4 no. barns to 9 no. dwellings. Erection of 8 no. dwellings, creation of access, with garages, landscaping and associated works | Hollybush Farm Acton Turville Badminton South Gloucestershire GL9 1HJ

P19/15336/LB | Demolition of small outbuilding. Internal and external alterations to include the erection of single storey rear extension to 'short barn', installation of new windows and doors facilitate conversion of 3 no. barns to 7 no. dwellings. | Hollybush Farm Acton Turville Badminton South Gloucestershire GL9 1HJ

Thank you for consulting the Cotswolds Conservation Board on the above planning applications.

The Board has been aware of The Badminton Estate's aspirations for new housing in Acton Turville for some time, having provided pre-application advice in relation to these aspirations in 2018, including a site visit in June 2018.

Whilst the Board acknowledges that there are some beneficial aspects to the proposed development, we object to the proposed development for the following key reasons:

- **Housing need** – the applicant has not demonstrated robust evidence of housing need, particularly with regard to affordable housing need arising within the parish of Acton Turville.
- **Scale** – increasing the number of dwellings in a Conservation Area by 40% is disproportionate and not appropriate within such a designation.
- **Historic environment** – the proposed development (particularly the new dwellings) would fundamentally and adversely change the setting of the affected listed buildings from that of a farm complex to that of a residential development; this, in turn would have an adverse effect on the Conservation Area and on the purpose of AONB designation.

The Board considers that the impacts relating to scale and historic environment, in the context of a Conservation Area setting in the Cotswolds Area of Outstanding Natural Beauty (AONB), are sufficient to merit major development status. As such, there should be a presumption against the development taking place. The Board considers that exceptional circumstances and public interest do not apply in this instance, not least because of the lack of robust evidence of housing need.

These issues are discussed in more detail in Annex 1 below. Annex 1 also outlines a number of additional concerns, including visual impact and impact on the settlement boundary.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk

Website: www.cotswoldsaonb.org.uk

If you have any queries regarding the Board's 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 MRTPI
Planning and Landscape Officer

ANNEX 1. THE CONCERNS OF THE COTSWOLDS CONSERVATION BOARD REGARDING PLANNING APPLICATION P19/15308/F AND P19/15336/LB

Factors to take into consideration

The proposed development is located in the Cotswolds Area of Outstanding Natural Beauty (AONB). The purpose of AONB designation is to conserve and enhance the natural beauty of the AONB. Therefore, a key consideration is the extent to which the proposed development contributes to – or adversely affects – this purpose.

Another key consideration is the need for the proposed development. The National Planning Policy Framework (NPPF) (in particular, paragraph 11 and footnote 6) make it clear that the requirement to meet objectively assessed needs (OAN) for housing, in full, does not apply in Areas of Outstanding Natural Beauty (AONBs), including the Cotswolds AONB.

In AONBs, housing provision should be based on robust evidence of local need arising from within the AONB, with priority being given to the provision of affordable housing, as outlined in policy CE12 (Development Priorities and Evidence of Need) of the Cotswolds AONB Management Plan.

Evidence of need

The Board recommends that the evidence of housing need referred to above should primarily relate to robust evidence of affordable housing need specific to the individual parish where the housing development is being proposed. Ideally, this should be in the form of an up-to-date Housing Needs Survey undertaken by the local authority on behalf of the parish (as indicated in paragraph 10.55 of South Gloucestershire's Core Strategy). With regards to this specific development, officers from South Gloucestershire Council have indicated that they are not aware of any Rural Housing Needs Survey for Acton Turville having been undertaken by South Gloucestershire Council. As such, the proposed development is missing a key piece of evidence of housing need.

The Board recommends that a cautious approach should be taken when considering the extent to which data from choice-based lettings systems, such as HomeChoice South Gloucestershire, contribute to evidence of housing need. Such data can be easily misinterpreted to present an inflated housing need figure. For example, registered households can potentially express multiple preferences for where they would like to live (so housing would not be required in each of these multiple locations in order to meet their needs). These preferences might include locations that the household has no local connection to. As indicated in paragraph 10.44 of South Gloucestershire's Core Strategy, '*a defined local connection to a settlement is a key component of this evidence base*'.

Whilst data relating to objectively assessed needs (e.g. a Strategic Housing Market Assessment) is a relevant consideration, it should not be an over-riding consideration. This is because, as indicated above, the NPPF makes it clear that the requirement to provide for OAN in full does not apply in AONBs. Also, the Government's planning practice guidance (PPG) states that AONBs are '*unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas*'.

It is also worth noting that the Sustainable Access Profile for Acton Turville states that the settlement is not considered to have a frequency and timing of public transport connections that facilitate sustainable access to key services and facilities.

All of these factors undermine the need for – and appropriateness of - the proposed development. Based on this assessment, the Board considers that the applicant has not

provided robust evidence of need, particularly in relation to affordable housing need arising within the parish of Acton Turville.

Impact on the purpose of AONB designation

Scale of development

The Cotswolds AONB Landscape Strategy and Guidelines states that housing development should be proportionate and not overwhelm the existing settlement.

The proposed development of 17 dwellings would represent an 11% increase in the number of dwellings in Acton Turville, compared to the existing 156 dwellings (albeit that 8 of the 17 dwellings would be in converted barns). This is a significant increase. Perhaps more significantly, 17 dwellings would represent a 40% increase in the number of dwellings in the Conservation Area. Whilst there is potentially scope for limited development in Conservation Areas, a 40% increase (or even 20%, if you didn't include the barn conversions) would be disproportionate.

On that basis it would not be consistent with the LSG or the policies set out in the Cotswolds AONB Management Plan. As such, the proposed scale of development would not be appropriate.

Historic Environment

A significant issue for the proposed development, in relation to the purpose of AONB designation, is the potential for adverse effects on historic environment and distinctive settlement character of Acton Turville.

Almost the whole of the proposed development is located in Acton Turville's Conservation Area, apart from the two fields within the eastern end of the development boundary and the first 70m, or so, of the proposed new entry road in the south west corner of the proposed development site. It would directly impact one Grade II listed building within the development boundary (the barn to the south east of Hollybush Farmhouse). There are also three Grade II listed buildings directly adjacent to the development site (Hollybush Farmhouse, Hollybush Cottage and the School House) with several more listed buildings in close vicinity. The impact of the proposed development on the setting of these buildings is a key consideration.

The Board recognises that the proposed development does provide some potential benefits in this regard, such as removing some of the more modern and unsightly structures (such as the silo and modern barn). There are also potential benefits in bringing the existing historical structures into a state of good repair, assuming that appropriate building techniques and materials are used, thereby helping to maintain their historic integrity and character (as is proposed).

However, there is a significant risk that the construction of the new dwellings (for example, those to the east of Hollybush Farm) and the extension of existing structures could have an adverse effect on these listed buildings, including their setting, and on the Conservation Area. In particular, the proposed development would fundamentally and adversely change the setting of the Hollybush Farm complex from that of a farm to that of a residential area.

As such, the Board considers that – even taking into account the potential benefits that the proposed development could provide – there would be a net significant adverse effect on the historic environment.

Settlement Boundary

The proposed extension to the most southerly barn (labelled C on page 13 of the Landscape and Visual Impact Assessment) and part of the new cottages labelled E on page 13 of the LVIA (including part of their gardens) would extend beyond the settlement boundary of Acton Turville. This should be considered to be an adverse effect of the proposed development.

Visual Impact

In its pre-application advice, the Board stated that:

- *The visual impact of the proposed development at Hollybush Farmyard would be relatively small, given that much of this part of the development would use existing buildings. Also, when seen from Burton Road, heading south out of the village, the existing buildings are below the level of Burton Road and, as such, do not obscure the view. The visual impact from Littleton Drew Road would also be minimal as features such as parking and services would be behind the street-front buildings. (N.B. Underlining added for emphasis, in the context of the visual impact of the Hollybush Farm proposal being relatively small compared to the additional development that was being considered at that time).*

Having looked at the development as currently proposed, it is evident that there would, in fact, be some adverse visual impacts, such as visual impact of the proposed new road entrance (for receptors on the B4039 approaching Acton Turville from the south). From the site visit that was undertaken in 2018, the Board also considers that the proposed extension to the most southerly barn would also potentially have a particular adverse visual impact as it would protrude the development beyond the current southern boundary of the built environment of the Hollybush Farm complex.

The Board recognises that there would potentially be some beneficial visual impacts (such as the removal of the silo and modern barn, as outlined above). However, it is far from certain that there would be a net beneficial effect with regards to visual impact. There could, in fact, be a net adverse effect.

Dark skies

The dark skies of the Cotswolds AONB are one of the AONB's special qualities. The Board acknowledges that the applicant is taking measures to minimise the potential adverse impacts of light pollution from the proposed development on these dark skies. For example, no lighting is being proposed in the public domain or on the southern boundary and skylights have been limited to the village-facing roofs. However, having multiple new dwellings with skylights that face towards a village Conservation Area is still likely to have an adverse effect.

Major development

A key consideration is whether the proposed development constitutes major development in the context of paragraph 172 and footnote 55 of the NPPF. This consideration should take into account the nature, scale and setting of the proposed development, and whether it could have a significant adverse impact on the purposes for which the area has been designated (i.e. to conserve and enhance the natural beauty of the Cotswolds AONB).

As indicated above, the Board considers that the scale of the proposed development is excessive, particularly in relation to the existing number of dwellings in the Acton Turville Conservation Area. The Board also considers that the proposed development, particularly

the new dwellings and barn extensions, would fundamentally alter the setting of the affected listed buildings from that of a farm complex to a residential setting. This, in turn, would have a significant adverse effect on the Conservation Area.

These adverse impacts would, in turn, have an adverse impact on the purpose of AONB designation, outweighing any potential benefits that the development might provide.

On this basis, the Board recommends that the proposed development should be considered major development in the context of paragraph 172 and footnote 55 of the NPPF. As such, there should be a presumption against the development being permitted. The Board considers that exceptional circumstances and public interest do not apply in this instance, given the lack of robust evidence of need, particularly with regards to affordable housing need arising within the parish (as outlined above).

Considerations if planning permission is granted

Without prejudice to the points made above, the Board recommends that, if planning permission is granted, this should only be for the conversion of the existing barns (without any extensions) and that the proposed new dwellings should not be permitted.