

Date of Meeting	31 st January
Application Number	18/10206/FUL
Site Address	Harestone House, Church Lane, East Kennett SN8 4EY
Proposal	Proposed development of four dwellings, and the extension and alterations to the existing property known as Harestone House, with associated change of use of equine yard, removal of modern barn & stables, and the introduction of car parking and WC facilities for church visitors.
Applicant	Mr & Mrs P Jones
Town/Parish Council	EAST KENNETT
Electoral Division	WEST SELKLEY – Cllr Davies
Grid Ref	411666 167455
Type of application	Full Planning
Case Officer	Ruaridh O'Donoghue

Reason for the application being considered by Committee:

This application is brought to committee at the request of Divisional Member, Cllr Davies, to consider the community benefits this development would bring to the Church which has resulted in local support for the scheme.

1. Purpose of Report

To consider the detail of the application against the policies of the development plan and other material considerations, and the recommendation that the application be refused.

2. Report Summary

The main issues to be considered are:

- Whether the proposal constitutes infill development as defined with CP 2;
- Whether the proposal is considered to be in a sustainable location (CP 48);
- Whether the scheme constitutes high quality design (CP 57);
- Whether the scheme would preserve or enhance the character and appearance of the Conservation Area (CP 58 & Section 72 of Planning (Listed Building and Conservation Areas Act) 1990)
- Whether the scheme would preserve or enhance the setting of the listed buildings (CP 58 & Section 66 of Planning (Listed Building and Conservation Areas Act) 1990)
- Whether the proposal would protect, conserve or enhance landscape character (CP 51);

- Whether the proposal would have a negative effect upon highway safety including if there is sufficient parking for the proposed use (CP 61 and 64); and
- Whether the proposal would have a harmful impact upon ecology (CP 50).

3. Site Description

The proposal concerns land at Harestone House in East Kennett, near Marlborough, which forms part of an historic farmyard known as East Kennet Farm. In the Wiltshire Core Strategy, East Kennett is identified as a small village suitable for infill development only.

The historic farmstead survives in part, with the original stables identified as significant unlisted buildings within the adopted Conservation Area Statement as, part of the site lies within the East Kennett Conservation Area. The original farmhouse appears, from the historic OS maps, to have been Foxtwitchen: the house still surviving and is also a significant unlisted building, which forms the visual terminus of the lane from the village into the adjacent fields and open countryside.

The site is adjacent to Christ Church, which is grade II listed.

EKEN5, a public right of way (PRoW) runs to the South Eastern boundary of the site.

The settlement of East Kennet is washed over by the North Wessex Downs AONB.

The village of East Kennett is bordered to the North, South and West by the Avebury World Heritage Site. The site is considered to fall within the setting of this.

The site is in a groundwater vulnerability zone according to EA mapping.

There are no other planning constraints listed for the site.

Below is a location map with photographs that show the context of the site.

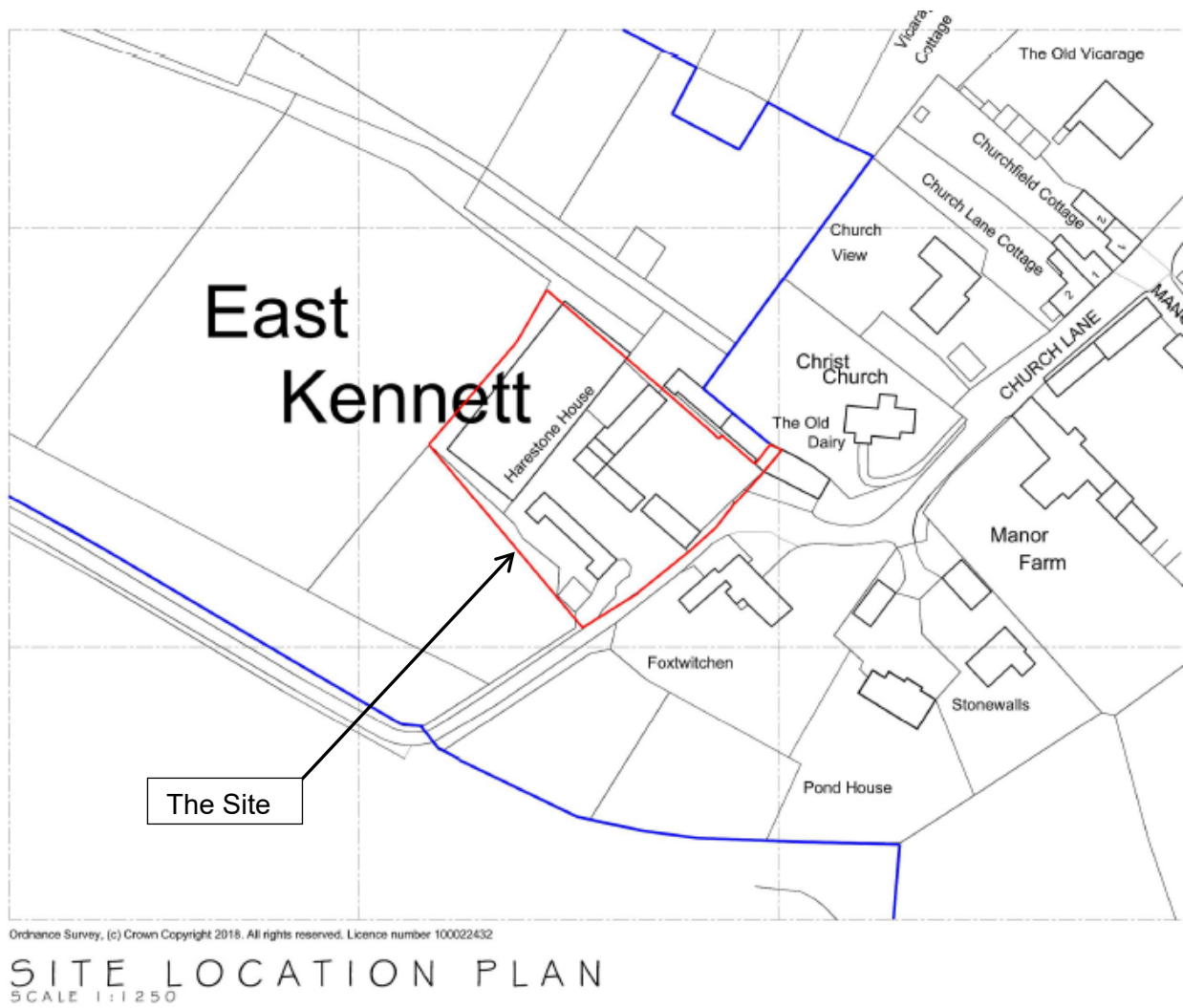


Photo 1: View of part of site looking North West



Photo 2: View to the West of the site



Photo 3: View to the West of the site showing open AONB landscape



Photo 4: View from Church Lane looking South West across the site



Photo 5: View of existing farm courtyard looking North West across the site



Photo 6: View of existing farm courtyard looking North East across the site



Photo 7: View looking to the South East of the site



Photo 8: View looking North East Across the site

4. Relevant Planning History

There have been several applications on the site in the past but none are relevant to the residential scheme that is put before this committee.

5. The Proposal

The application proposes the development of four dwellings, and the extension and alterations to the existing property known as Harestone House, with associated change of use of equine yard, removal of modern barn & stables, and the introduction of car parking and WC facilities for church visitors.

Plots 1-3 form a terrace. Plots 1 & 2 will occupy a footprint of 99m² with Plot 2 having a footprint of 90m². All 3 of the dwellings will have a ridge height of 6.5m.

Plot 4 will occupy a footprint of 202m² with a ridge height that varies from 6.5 – 7.4 metres.

Harestone house is to be extended significantly. The existing dwelling has a footprint of 119m² with the proposed scheme taking it up to 234m². The ridge height will not be increased as a result of the works and will thus remain at 6.8m.

All dwellings will be served by a shared access coming off Church Lane and branching into private driveways / parking areas.

Included within the application is the redevelopment of the existing courtyard into a parking area to serve the Church. 10 spaces are to be provided. The development will also include a passageway through to the Church from this proposed car park. To achieve this, a small section on the South East elevation of the existing stable block on the Eastern side of the site is to be removed. Part of this stable block will then be converted into a WC to serve the Church.

A landscaping scheme for the site has been provided as part of the LVIA.

Below are the existing and proposed plans and elevations of the scheme.



North East Elevation Barn 1



Plots 1-3 North East (Front) Elevations



Plots 1-3 South West (Rear) Elevations



Plots 1-3 South East (End) Elevation



Plots 1-3 North West (End) Elevation



Plots 1-3: Floor plan

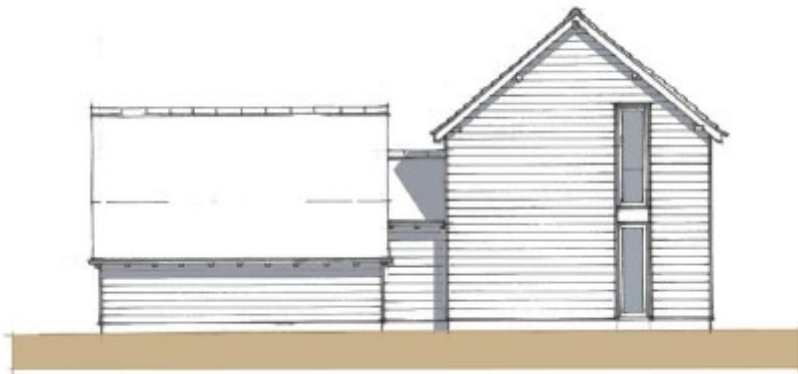
Plots 1-3 Floor Plan



Plot 4 South East (Front) Elevation



Plot 4 North West (Rear) Elevation



Plot 4 North East (End) Elevation



Plot 4 South West (End) Elevation

1ST FLOOR PLAN



GROUND FLOOR PLAN



Plot 4 – Floor Plans

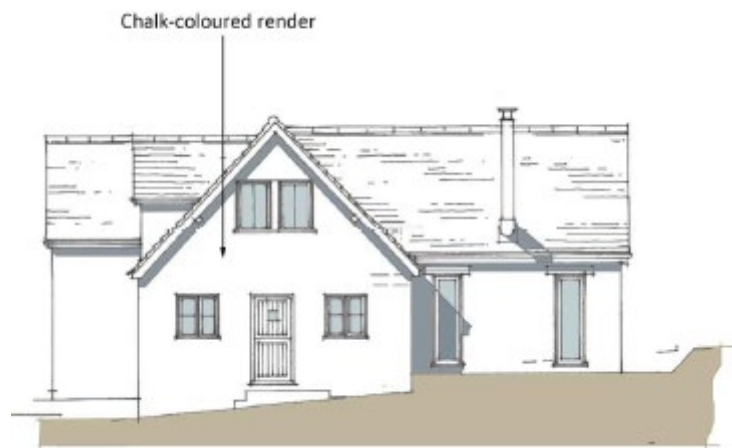
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Harestone House Proposed South East (Front) Elevation



Harestone House – Proposed North West (Rear) Elevation



Harestone House Proposed North East (Side) Elevation



Harestone House Proposed South West (Side) Elevation

POSED FIRST FLOOR



PROPOSED GROUND FLOOR



Harestone House Proposed Floor Plans

6. Planning Policy

Wiltshire Core Strategy 2015 (WCS):

- CP 1 – Settlement Strategy
- CP 2 – Delivery Strategy
- CP 14 – Marlborough Community Area
- CP 45 – Meeting Wiltshire’s housing needs
- CP 51 – Landscape
- CP 57 – Ensuring high quality design and place shaping
- CP 58 – Ensuring the conservation of the historic environment
- CP 59 – The Stonehenge, Avebury and Associated Sites World Heritage Site and its Setting
- CP 60 – Sustainable Transport
- CP 61 – Transport and new development
- CP 64 – Demand Management

National Planning Policy Framework 2012 (NPPF)

Section 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990

Supplementary Planning Guidance:

- Local Transport Plan 2011-2026 Car Parking Strategy (March 2011) – Minimum residential parking standards.
- Local Transport Plan 2011-2026 Cycling Strategy (March 2015) – Appendix 4
- Wiltshire Landscape Character Assessment 2005
- East Kennet Conservation Area Statement June 2004

7. Consultations

Local Highways Authority

They note that location of the proposal and the road network in the vicinity but they are minded that the likely vehicle movements associated with the residential use will not result in a significant detrimental impact.

They are happy to accept the layout for the site in regards to parking and it should be provided as per the layout drawing.

They suggest that a Construction Management Statement should also be conditioned to include pre-construction photographs and details of types and size of vehicles, working hours, site staff parking, mud mitigation etc.

Savernake Parish Council

Overall the Parish Meeting is in favour of this development, recognising the regeneration of the site and communal benefits for the Church, with the expectation that it be done in a manner sympathetic with its setting in an AONB and in keeping with the village vernacular.

Wiltshire Council Drainage Engineer

Supportive in principle of the scheme but they require more information to be supplied – notably, an outline surface water disposal plan, including infiltration testing results to BRE

365 standards and evidence that any proposed soakaway has a clearance of at least 1m from the groundwater level, allowing for seasonal variations.

Wiltshire Council Landscape Officer

They have looked at the information submitted for the Harestone House application, including the LVIA report.

The site lies within the setting of the World Heritage Site and within the East Kennett Conservation Area next to the listed Christ Church. It is also an historic farmstead.

They have noted the Case Officers in principle objection at the pre-app stage. In design terms they consider the heritage aspects to be main issues for this site – they request that consultation with the Conservation/ Heritage Officer is carried out.

Wiltshire Council Conservation Officer

Harestone House is a dwelling located within an historic farmstead on the edge of the rural village of East Kennett. The historic farmstead survives in part although the original stables have been identified as significant unlisted buildings within the adopted Conservation Area Statement. The original farmhouse appears, from the historic OS maps, to have been Fox Twitchen: the house still surviving and is also a significant unlisted building, which forms the visual terminus of the lane from the village into the adjacent fields and open countryside. The site is adjacent to Christ Church, which is grade II listed.

The provision of car parking and WC facilities for the church is an obvious benefit of the proposals, as is the removal of redundant, modern format farm buildings from the site, however the design of the proposed dwellings and the spilling of residential development into the fields beyond the Conservation Area and village boundary raise various concerns.

Guidance that really is the primary consideration in this case is *Wiltshire Council's Farmsteads Guidance*. This guidance was produced for the Council by Historic England to aid the understanding and development of proposals that preserve and enhance the farmstead character that is a strong presence in so many of Wiltshire's villages and East Kennett is no exception. It emphasises that traditional farmsteads make a positive contribution to local character and distinctiveness, by means of their architectural form, use of materials and how historic farm buildings, houses and spaces all relate with each other. The suite of documents that form the *Wiltshire Farmsteads Guidance* aims to inform and achieve the sustainable development of historic farmsteads, including their conservation and enhancement and therefore proposals to develop or redevelop historic farmsteads within Wiltshire should refer to this document. Unfortunately, the current application does not appear to have consulted this extremely important and informative document in drafting its proposals as I see no reference within the supporting information that this document has been referenced.

The first consideration in forming proposals to redevelop this site should be the *Farmsteads Guidance* given the history, form and character of the site. The proposed dwellings do not illustrate the farmstead character that is important to this part of the village's heritage and character. Indeed, although the submitted Planning Statement states that the linear range of houses have modest ridge heights that reflect 'the ides of a traditional brick agricultural or equine building', the ridge heights is about where the agricultural character of these buildings ends, as their design appears more akin to later Victorian almshouses rather than something reflecting the historic farmstead character of the site. On Page 9 of the *Farmsteads Guidance Assessment Framework*, it states the following in relation to design and siting:

Getting the design right is essential on such sensitive sites, and the understanding gained from Stages 1 and 2 will help to prepare a scheme that conserves and

enhances the historic character and significance of the whole site. New development might include new buildings, the demolition of modern or insignificant buildings and the opening of spaces to better reveal the significance of heritage assets.

New buildings and their siting

Consider how the understanding of the whole site and its historic plan form, as created in Stage 1, could:

- *Secure the future of highly significant or traditional buildings which have low potential for adaptive reuse.*
- *Inform the siting of new buildings so that they are on the footprint of lost buildings or so that they are sensitive to the historic plan form of the site.*
- *Make use of materials and building techniques of appropriate quality.*
- *Minimise fuel costs and reduce carbon emissions at source through careful consideration of site layout, building design and materials.*
- *Maximise orientation of buildings to take advantage of the sun's energy: many historic farmyards faced south.*
- *Help to consider whether the site requires enabling development, in order to secure the future of heritage assets.*

This is not to say that pastiche farm buildings should be proposed, but the character of the site and this form of buildings should be a starting point to influence the character and design of any development proposals, even if this is taken to be a modern interpretation of more ancillary building types.

This is important to emphasise, as the buildings within the village have an established hierarchy of building type, which peters out at the end of Church Lane: from church to dwelling to farmstead to open fields. This architectural hierarchy of buildings forms the character of the village and defines its setting. East Kennett is an agricultural settlement yet there is a clear hierarchy of building types evidenced in the village, from the formal Manor to larger gentleman farmer dwellings and then more humble vernacular farmworker cottages to converted farm buildings. 20th century development has generally respected this hierarchy of buildings within the Conservation Area and although there is a substantial proportion of 20th century development, for the most part the new housing is relatively unobtrusive. This has mostly, although not wholly, preserved the historic social stratum and development of the village that forms part of its character and appearance: any redevelopment of the proposal site will have an impact on this character and appearance of the conservation area and thereby it is vital that proposals respect its immediate and wider surroundings.

The provision of 3 rear gable extensions, front dormer windows and rooflights on the existing Harestone House (plot 5) are not respectful of the overall character and appearance of the conservation area, and the adopted statement has the following on these architectural features within the village: *Over-extension of existing buildings and the insertion of rooflights, or inserted dormers on prominent roof slopes, would be inappropriate in relation to the architecture of the village.*

In addition, Wiltshire Council's adopted *Householder Design Guide* has the following on dormer windows for all buildings, not just those within or adjacent to conservation areas:

A dormer window is a vertical window or opening in a sloping roof, having its own roof, either flat, pitched or curved. Since it can have a significant effect on the appearance of a house, its design needs careful consideration in line with the following principles

Design – The design of a dormer window should:

- reflect the style, proportion and shape of the existing house and roof design

- be designed to provide light to existing spaces and not as an opportunity to create an enlarged floor area
- always be located at the rear of the property unless dormer windows are a particular feature of the surrounding streetscape
- work on the principle that small is beautiful – two smaller dormer windows will always be preferable to one larger structure
- minimise overlooking of adjoining properties; where this is not possible, rooflights may have to be considered as an alternative

Position – Dormer windows should

- line up with the existing windows below
- be set well back from the front or rear wall of the property and below the existing ridge line
- neither wrap around existing roof slopes, nor match nor exceed the ridge line
- on semi-detached or terraced properties, be set in approximately 1m from the party wall, flank wall or chimney

Proportion and scale – To retain a proper balance

- the window and the dormer frame to each side of the window, including cheeks, should be smaller than the window below it
- the entire dormer structure should be subordinate in the roof and should not occupy more than one third of the width or half the depth of the roof slope.
- dormer cheeks should be the minimum necessary to simply frame and support the window opening
- the pitch of the roof to the dormer should match that of the principal roof
- the window itself should reflect the style and design of those below.

Those dormers that are proposed are overly large, making the roof appear rather top-heavy and introduce a feature that is not in keeping with the village's established character and appearance.

Policy reasons regarding the acceptability of redeveloping the site, the proposals are not considered to preserve or enhance the character and appearance of the Conservation Area. From the point of view of the historic environment, the redevelopment could be considered acceptable if an appropriately and sensitively designed scheme came forward that reflected and took influence from the historic farmstead and form and style of agricultural buildings. As it stands, the proposals offer limited community benefits that does not outweigh the harm caused by the density and design of the development: this community benefit could still be provided with a revised scheme that is more appropriate in style, design, siting and density. Therefore the proposals are considered to be contrary to current planning policy, in particular:

Wiltshire Council's Core Strategy

CP57 states that 'development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality' and this is not considered to be the case with this proposal. The policy promotes good design, and 'good design helps to provide a sense of place, creates or reinforces local distinctiveness, and promotes community cohesiveness and social wellbeing. Wiltshire has a rich built heritage and its vibrant towns and villages are set within large expanses of open countryside which is valued for its tranquility and beauty as well as its environmental value. Enhancing the character of Wiltshire's countryside and settlements is of the utmost importance and, in order to do this, development must be informed by a thorough understanding of the locality and the development site' – none of the aspirations for design set out in this Core Policy are adhered to in the proposal.

CP58 'Ensuring the conservation of the historic environment' requires that the '*distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance with Core Policy 57 (Ensuring High Quality Design and Place Shaping)*'. The designs of the proposed dwellings, which include the introduction of non-traditional architectural elements that are not evidenced in the village, are considered to have a negative impact on the setting of the designated heritage asset, namely the East Kennett Conservation Area, causing it harm.

NPPF

Paragraph 193 states that '*when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance*'.

Paragraph 196 states that '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*'. Although considered less-than substantial, this is still harm to the heritage asset and a sensitive redesign of the dwellings that respect the farmstead character of the site and removes controversial elements could significantly reduce this harm. Although the redevelopment of the site could benefit the village, the design, style, density and form of development causes harm and this is not outweighed by the limited public benefit that is proposed as part of the proposal: this benefit could still be achieved with a revised scheme that addresses these concerns.

Paragraph 200 states that '*local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*' The development fails to preserve the character and appearance of the conservation area and therefore causes harm to its setting.

Wiltshire Council Public Protection Officer

No objection subject to conditions to control hours of working and that no waste is burnt on the site during the demolition and construction phase of the development.

Wiltshire Council Archaeology

The Wiltshire and Swindon Historic Environment Record shows that the proposed development affects a heritage asset, known as Foxtwitchen, a historic farmstead which dates back to at least the 19th century. The Wiltshire and Swindon Farmsteads Project states the site consists of three sides of loose courtyard formed by working agricultural buildings with additional detached elements to the main plan. It goes on to state that the farmhouse is set away from the yard and there has been less than 50% loss of traditional buildings. The site is also situated within an area of settlement which dates back to the Saxon period, known as Cynetan in AD 939. The development site is situated on the periphery of the Avebury World Heritage Site and there is a high potential for prehistoric remains, with a group of possible barrows recorded only 80m to the south.

The Desk Based Assessment submitted with the application states that the development site is situated within the westernmost edge of the area suspected to be the site of the Saxon settlement, where an extensive series of earthworks forming small rectangular enclosures have been recorded, with building platforms, banks and hollow way. The Desk Based Assessment concludes that there is a moderate to high potential for prehistoric and medieval

archaeological remains within the areas proposed for development. It goes on to state that the remains may have been truncated by previous activity associated with building and construction of the barn, stables and Harestone House, or by activity associated with the farm.

In light of the conclusions of the Desk Based Assessment they recommend that a programme of archaeological investigation can be made a condition of planning approval. Following demolition of buildings on site, trial trench evaluation will need to be carried out and depending on the results further mitigation may be required.

There may be a requirement for building recording and on this matter they urge the Case Officer to discuss the necessity and appropriate level with the relevant Conservation Officer. On its impact on the World Heritage Site they urge the Case Officer to discuss this matter with the Stonehenge and Avebury World Heritage Site Partnership Manager.

World Heritage Site Officer

As set out in Policy 59 evidence is required to demonstrate that the development will have no individual, cumulative or consequential adverse effect upon the WHS and its OUV. This includes the physical fabric, character and appearance, setting or views into or out of the WHS.

It is disappointing to note that nowhere in the application is there specific evidence and explicit analysis of impacts on the World Heritage Site and its OUV. The Planning Statement does not mention Policy 59 or provide evidence to demonstrate impacts on the WHS even though the proposed development is within the setting of the WHS and pre-application advice was provided on the requirement for this. The Archaeological Desk based assessment does not refer to Policy 59 and in its bibliography, includes only the Consultation Draft of the WHS Management Plan (2014) despite the 2015 Management Plan having been available being on line for over 3 years.

The LVIA does mention the WHS and provide some relevant viewpoints although it is not designed specifically to discuss impact on the WHS as, in line with accepted LVIA methodology, it limits itself to “predicting possible effects from PRowS, roads, publicly accessible areas and residential properties within the study area.” In discussion with the WHSCU viewpoints could have been identified and agreed to specifically assess impacts on the WHS and its OUV. These would have included East Kennet Long Barrow and Bronze Age barrows to north and closer to the development.

The most relevant viewpoints included appear to be 6, 7 and 8. The development would be visible in these viewpoints. In order to assess its impacts more accurately photomontages would have been helpful with indications of the palette. This would have helped with ensuring the scale and layout are the least intrusive in sustained views from and into the WHS. It would also have assisted in identifying where mitigation in terms of choice of materials and palette would have been appropriate. Choice of an appropriate, muted minimally intrusive palette and non-reflective materials will be important in minimising intrusion.

Currently the limited evidence provided by the viewpoints do not indicate significant harm but further evidence will be needed to better assess impacts on the WHS and its OUV and ensure that the most appropriate and effective mitigation can be identified and agreed. Filtering by tree cover should not be accepted as effective mitigation if development is not demonstrated to be appropriate. Trees are not permanent features in the landscape setting.

I am very happy to advise on further evidence to assist in assessing impact and effective mitigation measures as required to protect the WHS and its OUV.

The proposed dwellings in this area are likely to increase light in the wider landscape extending the domestic footprint of the village. A scheme for limiting additional light pollution needs to be provided.

The Archaeological Desk based Assessment concludes that “there is moderate to high potential for prehistoric and medieval archaeological remains within the areas of the Site selected for development, within this proposal.” My colleague the County Archaeologist has advised on necessary archaeological assessment and mitigation.

8. Publicity

The application has been advertised by way of a site notice and neighbour notification letters. Around 10 letters of support have been submitted for the application as a response to this consultation process. The following is a summary of the main comments made:

- It will visually enhance the site with the removal of the large agricultural buildings and dilapidated sheds / stables.
- It will provide much needed facilities for the church – the only meeting place in the village
- It will provide much needed housing for the community and wider area
- It will reduce the amount of traffic down Church Lane
- It will reduce the amount of parking on Church Lane caused by visitors to the Church
- There is community support for the proposal
- Support for the scheme provided there is adequate drainage for the development and that the road can take the traffic associated with it
- Support provided there is good landscaping and materials for the dwellings

9. Planning Considerations

The starting point for the determination of this application under section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the decision be made in accordance with the development plan, unless material considerations indicate otherwise i.e. and for the purpose of Section 54a of the Town and Country Planning Act, the proposal must comply with the development plan as whole.

Principle of Development

East Kennett is defined as a Small Village where under Core Policy 1 and 2 new residential proposals are only acceptable in the form of infill development. For the purposes of Core Policy 2, infill is defined as a small gap within the village that is only large enough for not more than a few dwellings, generally only one (page 52 of the WCS). If a site is considered to be infill then a proposal will be supported where it seeks to meet the housing needs of settlements or provide employment, services and facilities provided that it:

- i. Respects the existing character and form of the settlement
- ii. Does not elongate the village or impose development in sensitive landscape areas
- iii. Does not consolidate an existing sporadic loose knit areas of development related to the settlement.

Looking at the definition of infill development, there are 3 questions to take from it that must be answered. They are as follows.

Does the site constitute a small gap?

The site contains a range of former farm buildings that have since been converted to stables and 2 no. dwellings. The site also contains a modern stable block on the western side. It is therefore not considered to be a small gap but rather a developed site; a site for that matter proposed to be redeveloped.

Is the site within the village?

The site is considered to be on the edge of the built up area of East Kennett. It is surrounded on two and half sides by open countryside / paddocks. Development on the edge of a village cannot be said to be development within it. For a site to be considered infill it should be sandwiched between groups of housing or other forms of development.

Is it only large enough for not more than a few dwellings (generally only one)?

The site is approximately 0.33 ha and can, as the plans demonstrate, accommodate more than a few dwellings. It therefore does not meet this part of the definition.

Setting aside the definition of infill to look at other parts of the policy, no evidence has been submitted to demonstrate that this development is required to meet the housing needs of the settlement. However, it is acknowledged that the provision of car parking facilities for the church and a WC would be providing a community facility for the benefit of the church. Support in principle for this part of the proposal is recognised. That said, it is unclear from the evidence provided why this benefit needs to be delivered alongside 4 new dwellings and substantial additions to another. A more muted scheme could achieve the same benefit.

With regard to the three Roman numeral points above, the scheme is not considered to respect the existing character and form of the settlement and would consolidate an existing sporadic loose knit area of development. These points will be covered in more detail in further sections of the report. It is accepted that the development would not elongate the village. Although it is clear that non-conformity with these points further exacerbates the conflict with Core Policy 2.

Whilst it is appreciated that equestrian development can be considered as 'brownfield land', it must be noted that this is not a trump card. Indeed, there is a preference for development of brownfield land over greenfield but this should not come at the expense of other local plan policy.

Design / Heritage Impact

The size of the site is fairly small for the comparatively different forms of development that are proposed on it. There is a range of architectural styles, materials, buildings heights and detailing employed across the site. The architecture of a farmstead would be one of much simpler form with less fussy design and a humbler palette of materials – as displayed within the existing historic buildings on the site and to a degree in the newer build elements. As the design rationale for the scheme appears to have been to create a development that reflected well the history of the site this seems to have been somewhat lost in translation.

Although now in equestrian use (the informal builders yard use being unauthorised and therefore forming no part of the considerations), the site retains its agrarian character and the proposed layout and design of the new dwellings and the alterations to the existing one, will erode this through a scheme that does not reflect well the history of the site as a former farmstead. East Kennett is very much influenced by agriculture as seen in Manor Farmhouse, Orchard Farmhouse and farmyards within the village and this makes up one of the key characteristics of the Conservation Area. Removal of these agricultural influences

erodes the historic value of the Conservation Area to a harmful degree. This would be contrary to the aims of CP 57 with regards to the developments response to the historic environment and the need for it to be sympathetic to and conserve historic buildings and landscapes. Ergo, it would also conflict with Core Policy 58 as it fails to protect or conserve the historic environment.

Furthermore, the density of development in relation to the sites immediate environs is notably higher. The neighbouring properties of Foxtwitchen, Pond House, Stonewalls, Manor Farm, Church View and Christ Church take the form of sporadic loose knit development. The introduction of higher density housing will consolidate this area of existing sporadic loose knit development that exists in this part of the village. By way of an example, the curtilage of Foxtwitchen is more or less the same size as the total for the 4 new dwellings. This will have a harmful character change to this part of East Kennett contrary to the designs principles set out in CP 57 – notably, point i (responding to the existing pattern of development) and point vi (appropriate development which relates effectively to the immediate setting...of the area).

The high density also results in a rather cramped form of development. Plot sizes are not in keeping with the surrounding area and thus the development overall, does not positively respond to the existing built form, a requirement of point iii of CP 57. The lack of planting in the site (as indicated on the plan entitled Mitigation Strategy in the LVIA) highlights the fact that the development is cramped as there is little space left to provide planting throughout the development. It is worth noting that the Conservation Area Statement states that a potential threat to the character and appearance of the Conservation Area is an excess of paved surfaces, including formal driveways – something which this development through its lack of planting and soft surfacing fails to prevent. It is evident therefore that the density of development negatively impacts upon the character and appearance of the Conservation Area.

Turning to the detailed design issues with each of the plots, the following comments are noted.

Plots 1-3 form a terrace. Whilst it is acknowledged that they have been designed to reflect the idea of a traditional brick agricultural or equine building, they will still appear overtly domestic in character, and, as the Conservation Officer has stated, more like Alms Houses than agricultural buildings. Furthermore, traditional agricultural or equine buildings do not typically contain rear projecting gables and / or porches. In addition, the enclosed amenity spaces and domestic paraphernalia will obviously add to the domestic character of the site.

Plot 4 is a large dwelling of differing form, materials and height. It is somewhat larger than the surrounding properties and thus sits out of character with the immediate environs. Whilst it is appreciate that it replaces a large modern shed it will domesticate this part of the site in the same manner as with Plots 1-3 (garden, domestic paraphernalia etc.)

The extensions to Harestone House are large and will add considerably to the footprint of the building. As an historic agricultural building its current form still retains this character to a reasonable degree. The addition of non-traditional elements such as the large dormer windows, rear projecting gables and attached garage will alter the character of this building significantly such that the ability to read the building as a former agricultural one will be all but lost. This will further erode the agrarian character of the site. Furthermore, the East Kennett Conservation Area Statement states that *“the insertion of rooflights, or inserted dormers on prominent roof slopes, would be inappropriate in relation to the architecture of the village”* (page 9). The design approach taken for the extension and alteration of Harestone House will therefore have a negative impact on the East Kennett Conservation Area.

The design approach taken for the dwellings is considered not to reflect the history of the site and the wider agricultural influences of the village. The Conservation Officer has stated that no reference has been made to Wiltshire's Historic Farmstead Guidance which is something that was brought to the applicant's attention at pre-application stage – with none of the dwellings reflecting any agricultural style. Whilst the Conservation Officer and the Case Officer are in agreement that a pastiche of the old is not necessarily the appropriate way forward for the site, the character of the site and this form of buildings should be a starting point to influence the character and design of any development proposals, even if this is taken to be a modern interpretation of more ancillary building types. At present, the design of the dwellings conflicts with the design principles set out in CP 57, which in turn causes harm to the character and appearance of the East Kennett Conservation Area contrary to CP 58 and policy within the NPPF.

Visual Impact

Core Policy 51 of the WCS requires development to protect, conserve and where possible enhance landscape character. It must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as practically possible.

The site takes advantage of some existing boundary screening in the form of mature hedging and trees. Nevertheless, there are still open elements to the site that border the agricultural fields. It is accepted that the existing modern buildings on the site are not of aesthetic quality within the landscape. However, this is not uncommon with agricultural buildings as they are designed to be functional buildings that are there to meet the needs of the farm, usually storage. It does not mean that they are appropriate in the landscape and are often erected under permitted development rights without the same controls by the LPA.

Furthermore, these buildings were erected when the site was in use as a farm or equestrian enterprise and as such tied in with these uses and the more historic farmstead buildings. Although it can be argued that they are not of any architectural merit they have never looked out of character by reason of this point. The former farmstead offers an important transition between the main built form of the village and the countryside beyond which is, a common arrangement throughout many villages in Wiltshire and the countryside alike (indeed East Kennett, rich in its farming history reflects this tradition well with the former farmsteads petering out the village out at the end of the lanes). It gives a sense order to the architecture and a degree of ranking to the importance of the buildings - the 'urban' core of the village, with its more formalised housing and being of higher importance to the informal and simpler formed agricultural buildings that surround it. This provides the appropriate transition between the settlement and countryside beyond, offering a softer and more appropriate transition to the more modern, harsh urban edge, formed by close boarded fencing and estate style dwellings that is unfortunately, all too often seen these days. The proposed development would upset this balance.

Landscape Character

The introduction of housing where currently there lies former agricultural /equestrian buildings would change the landscape character of the site introducing urbanising features into what is currently a very rural landscape. It would in a sense extend the residential element of the village outwards to the south west. East Kennett Lies on the boundary between Type: 1A Horton Downs and Type: 5A Kennet Chalk River Valley of the Wiltshire Landscape Character Assessment. One of the main conservation aims within these landscapes, as set out in their Character Assessments, is to prevent urban sprawl. Extending the residential element of the village outwards at a density that is not in keeping with the site environs would very much constitute urban sprawl. This would have a harmful and permanent character change to the landscape and would create a more defined and harsher urban edge. Even the proposed planting will bring a degree of formality to the garden edges and thus will not be able to truly combat the issue. Given the sensitivity of the landscape

(part of the site is within the Conservation Area and the whole of it is within the AONB and setting of the Avebury World Heritage Site) the susceptibility to change is something that should be very carefully managed to avoid insensitive and harmful character changes. It worth noting that paragraph 172 of the NPPF states that great weight should be afforded to conserving the landscape and scenic beauty of AONBs as they have the highest status of protection.

Visual effects

Officers consider the main landscape harm to derive from character change. However, the knock-on effect of this harmful character change is on the visual receptors that run past the site or near to it. The existing former farm complex offers a visual transition from village to countryside and a much softer developed edge for those walking along the PRow to the south west of the site. The introduction of 4 additional houses, car parking, extensions to the existing dwelling and an overall domestic feel to the site would have a pronounced visual effect on this part of the village; both from views obtained when leaving the village along EKEN5 and when approaching the village on it. Mitigation against some of these impacts through landscaping is proposed but this does not make the visual effects acceptable. As mentioned above, the site being within the AONB with much of the surrounding landscaping designated as World Heritage Site means these visual receptors are of elevated importance. Certainly given the fact that much of the villages is surrounded by higher ground affording more distance views of the site.

It is clear from the above points that there is conflict with Core Policy 51 of the WCS as the development would not be considered to conserve landscape character. Whilst, it is appreciated that the site is currently vacant, and without maintenance or upkeep, this in itself should not be reason alone to sweep aside the visual impacts the proposed development would have. Furthermore, the elements of the site considered untidy by virtue of the informal storage of building materials are not something which should influence this decision. This use is unauthorised and therefore, is not the fallback use of the site. The matter can be addressed separately through the Council's Planning Enforcement Team.

Highways Safety / Parking

The likely vehicle movements associated with the residential use will not result in a significant detrimental impact on the surrounding road network.

The Local Highways Authority (LHA) accept the layout for the site in regards to parking. They request that it should be provided as per the layout drawing, which, in the event the application was being recommended for approval could have formed one of the conditions.

The LHA also think a Construction Management Statement should be conditioned to include pre-construction photographs and details of types and size of vehicles, working hours, site staff parking, mud mitigation etc. Your officers would have considered this condition necessary to protect the amenities of the surrounding area if the application was being recommended for approval.

Neighbour Amenity

The nearest dwellings to the proposed development are Foxtwitchen and The Old Dairy (excluding Harestone house as it forms part of the development scheme). The proposed dwellings have been designed to ensure that there will be no loss of privacy to these dwellings as no windows are positioned in close enough proximity to cause overlooking. The dwellings also sit a sufficient distance away such that they will not cause any loss of light or have an overbearing impact upon the occupiers of these properties. No other dwellings stand to be affected by the development.

With regard to the amenity of future occupiers of the development itself, Core Policy 57 requires a reasonable standard to be achieved. As noted previously, the development appears somewhat cramped and this is likely to give rise to amenity issues. Such issues are symptomatic of high density developments

This is evident when looking at Plot No. 4. It contains a window at first floor level in the North East (End) Elevation that directly looks out on the rear garden of Harestone House with a separation distance between the two entities of just 4.7m (acceptable standards are usually 10.5m). It also contains a window at first floor level in the South East (Gable) Elevation that faces directly towards Plot No. 3 at a distance of just 6.8m to the boundary. This window will look across the rear garden of Plot No. 3 and directly down to the corner window serving bedroom 2 of this property.

Further evidence is seen when assessing the proposed parking for the development. Each property within the terrace (Plots 1-3) requires two off road parking spaces to be provided to meet Council standards. When looking at Plot 2, it appears that parking for this property is in part provided on Plot 1. This is an unsatisfactory arrangement that will cause noise and disturbance issues to Plot 1 - notably as it is a single storey dwelling and this parking space is right outside a bedroom window.

Whilst it may be possible to design out some of these issues, this is likely to come about from a reduced scheme. Whilst officers accept that there may be a certain degree of buyers beware (as these are new dwellings), at present, it is not considered that an appropriate standard of amenity is achieved for future occupiers of the development site that would accord with the high design requirements of CP 57.

Archaeology / World Heritage Site

In light of the conclusions of the Desk Based Assessment they recommend that a programme of archaeological investigation is made a condition of planning approval. Following demolition of buildings on site, trial trench evaluation will need to be carried out and depending on the results further mitigation may be required. In the event the application was being recommended for approval, your officers conclude that this matter could have been conditioned accordingly.

The World Heritage Site Officer has supported the scheme subject to conditions. They have concluded that despite no reference being made to the WHS in the applicants submission, the limited evidence provided suggests it is unlikely to have a significant impact upon any attributes of Outstanding Universal Value. The design issues raised by the World Heritage Site Officer are concerns raised by the Case Officer through other policies (CP 51, 57 and 58) of the local plan. It is therefore not necessary to replicate them here.

Impact to Ecology

The buildings were inspected for the presence of bats. To a large extent the buildings provide suboptimal conditions for bats and therefore, their presence was unlikely. The report however confirms that no bats species were found to be present on the site. Provision of a bat box or bat tiles on the site to provide a suitable roosting place for crevice dwelling bats is to be provided. It is suggested by the applicant that this can be provided via a planning condition.

Nesting birds were found on the site, predominately under the eaves of the buildings. The Ecology Report outlines measures to provide suitable replacement habitats for nesting birds. The applicants have stated that the type and number of these can be controlled via planning condition.

In the event the application was being recommended for approval, these conditions could have been imposed to ensure adequate compensatory habitat is provided for nesting birds and that biodiversity enhancement is secured for bat species.

On this basis, there are no ecology objections on the site.

Drainage

The original information submitted to cover surface water drainage on the site was considered inadequate by the Drainage Officer. Further details were supplied by the applicant but still do not contain the level of information that the Drainage Officer was after.

The area is shown at risk of groundwater flooding on EA mapping, and is not much higher in elevation than the River Kennet, which is a known winterbourne (groundwater fed) watercourse. It is therefore likely that while the local chalk does have good drainage properties, this will not work if the local groundwater levels inhibit infiltration.

Infiltration testing results to BRE 365 standards and evidence that any proposed soakaway has a clearance of at least 1m from the groundwater level, allowing for seasonal variations would need to be supplied to demonstrate soakaways would work on the site. In spite of the latest comments from the Drainage Officer, your officers are satisfied that this could be dealt with via a suitably worded planning condition to ensure no work commenced until a scheme for the discharge of surface water from the site was submitted to the LPA for approval. Such a condition would have been added in the event the application was being recommended for approval.

In any event, the applicants will require land drainage consent from the Lead Local Flood Authority (the Council).

10. Planning Balance / Conclusion

Harms

The proposed development would be contrary to Core Policy 2 of the WCS as the proposal does not constitute infill development. It is therefore not considered to be acceptable in principle.

The design does not meet the high standards required by Core Policy 57 of the WCS as it fails to respond positively to the history of the site, the surrounding area and the pattern of development for this part of East Kennett. Furthermore, by virtue of the cramped form of development, it fails to achieve appropriate levels of amenity for future occupiers of the site.

As a result of the loss of the agrarian character of the site, and the suburban influences introduced by a high density residential scheme, the character of the landscape will undergo a permanent and harmful change where the soft transition between urban and rural is lost by the breaking down of the hierarchy of buildings – the farm buildings on the edge of the village, functional and associated more with the surrounding countryside and the dwellings associated with the built form of the village. The result is the creation of a form of development that is unacceptable within this sensitive AONB landscape. This is contrary to Core Policy 51 of the WCS that seeks to preserve or enhance landscape character.

Less than substantial harm is caused to the character and appearance of the East Kennett Conservation Area. Paragraph 196 of the NPPF states that “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*” See paragraph below for an appropriate assessment of this.

Benefits

The scheme will provide dedicated car parking facilities for the church, removing the current demands on Church Lane. It will also provide a WC for the Church. As the only meeting space within the village, these facilities will make it a more attractive venue for events beyond the regular church services. For the purposes of paragraph 196 of the NPPF this would be considered a public benefit. However, it has not been made clear why a scheme of 4 houses is required to deliver these benefits. This somewhat tempers with the weight that is therefore attributed to this benefit. Furthermore, the harm arising from the redevelopment of the former farmyard upon the Conservation Area is not outweighed by these public benefits as it seems these could be delivered without causing the level of harm that this scheme does.

The removal of the large agricultural building and stable blocks would open up the site, providing enhanced views of the Church from the EKEN5 and would improve the setting of the villages Conservation Area. A conservation benefit results here which, is a public benefit in its own right. It would also be beneficial to the landscape as these buildings are not of architectural merit. However, this benefit is all but cancelled out by the introduction of 4 No. dwellings which in themselves cause harm to the historic environment. As such, this public benefit is not considered to outweigh the harm.

The scheme has not accrued any technical objections from the Local Highways Authority, the Council's Public Protection Team and the County Archaeologist. The LPA is also satisfied that matters relating to surface water drainage and ecology on the site can be controlled via the use of planning conditions. These points obviously weigh in favour of the scheme.

Conclusion

The benefits of the scheme are indeed noted and weight is given to the positive impacts this may have on the village. However, the clear and evidential conflict with development plan policy (CP 2, 51, 57 and 58) carries with it sufficient weight such as to greatly outweigh the benefits of the scheme. As a result, the scheme cannot be considered to comply with the development plan as a whole. Material considerations, including the policies contained within the NPPF do not indicate a decision should be made otherwise. Accordingly, your officers request that the scheme be refused in line with the recommendations raised below.

RECOMMENDATION:

That planning permission be refused for the following reasons:

1. The proposed development is not considered to be infill development as it is not a small gap within the village that is large enough for not more than a few dwellings, generally only one. Furthermore, it does not respect the existing character and form of the settlement and would consolidate an existing area of sporadic loose knit development. As such, it fails to comply with the criteria of Core Policy 2 of the Wiltshire Core Strategy that pertains to development at Small Villages.
2. The proposed development by virtue of its design, layout and density would conflict with Wiltshire Core Strategy Core Policy 57 point i which requires development to enhance local distinctiveness by relating positively to the existing pattern of development, to point iii which requires development to respond positively to the existing townscape in terms of building layout, form, height, mass, scale, plot size and materials, to point iv, which requires development to be sympathetic to the historic environment and to point vi, which requires development to be appropriate to the immediate setting of the site and

the wider character of the area.

3. The proposed development would cause harm to the character and appearance of the Conservation Area by virtue of its poor design which erodes the agrarian character of the village and fails to respect the historic value of the East Kennett Conservation Area. Whilst this harm is considered to amount to less than substantial harm in the context of the NPPF (requiring there to be public benefits to outweigh this harm in order to grant planning permission), no public benefits have been identified which are considered to outweigh the harm to the heritage assets (NPPF paragraph 196).

The proposal is therefore considered to be contrary to Core Policy 58 of the Wiltshire Core Strategy; guidance within the PPG and NPPF (especially paragraph 196), and the duty placed on the Council under sections 72 of the Planning (Listed Building and Conservation Areas) Act 1990, to have special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

4. The proposed development would harm the amenity of existing occupants by virtue of overlooking from first floor windows, and would not ensure that appropriate levels of amenity are achievable within the development itself by reason of noise and disturbance from the proposed parking areas and through overlooking of private amenity spaces and a bedroom window. As such, the proposal is contrary to Core Policy 57 point vii of the Wiltshire Core Strategy 2015.
5. By virtue of the loss of the agrarian character of the site, the suburban influences introduced by a high density housing scheme, and by extending the residential element of the village outwards, the character of the landscape will undergo a permanent and harmful change. The scheme is not considered to protect, conserve or enhance landscape character and is therefore contrary to Core Policy 51 of the Wiltshire Core Strategy 2015 and to central government policy contained within the National Planning Policy Framework 2018, notably, paragraph 172 that places great weight on the importance of conserving AONB landscapes.