INDIGO

LANDSCAPE APPEAL STATEMENT

UPPER FARM, WEXCOMBE, WILTSHIRE, SN8 3QS.

MARK GIBBINS, BA (HONS) MLI

LOCAL PLANNING AUTHORITY REFERENCE:

PL/2023/07710

July 2024

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1 INTRODUCTION AND BACKGROUND

1.1 This statement has been undertaken at the request of Atlas Planning Group in response to the refusal of a planning application for a proposed replacement dwelling at Upper Farm, in Wexcombe, Wiltshire (planning authority reference PL/2023/07710).[1]

1.2 The application proposed the replacement of an existing agricultural barn which has extant approval for conversion into a 5 bedroom dwelling, and which was granted permission at an appeal in May 2022 (hereafter referred to as the "extant scheme"). [2]

1.3 The Appeal Site lies falls within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) now referred to as the North Wessex Downs National Landscape, however, both terms remain in use and I have used them interchangeably throughout this Statement.[3]

1.4 The application process included a positive Pre-Application consultation with Wiltshire Council ("the Council");[4] and both the Landscape and Conservation Officers at the Council raised no objections to the scheme;[5] however, the case officer then disregarded the comments of his specialist officers and a refusal notice was issued on the 7th June 2024.

1.5 This appeal has therefore been submitted on behalf of Sherbourne Wexcombe Limited against refusal of the planning application.

1.6 All references to Appendices in this Statement refer to a set of common appendices prepared by the Appellants team.

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1 Decision notice dated 7th June 2024.

2 Application Reference PL/2021/04069 - Appeal reference APP/Y3940/W/21/3284520. Copies in Appendix C.

3 For example, when referring to the North Wessex Downs AONB Management Plan I have tended to refer to it in these terms rather than changing to 'National Landscape'.

4 Refer to Appendix B and the Statement of Case by the Atlas Planning Group for details.

5 Refer to the Landscape and Conservation Officer's comments in Appendix A.3 and A.4 respectively.

2 QUALIFICATIONS, EXPERIENCE, AND SCOPE OF THIS REPORT

Qualifications and Experience

2.1 My name is Mark Gibbins and I am a Director of Indigo Landscape Architects Limited, a landscape architectural consultancy based in Salisbury, Wiltshire. I hold a Bachelor of Arts Honours degree in Landscape Architecture, am a Chartered Member of the Landscape Institute and have been a practicing Landscape Architect since 1992.

2.1 In the course of my professional career I have worked in private practice (for some 31 years) during which time I have been involved in a wide range of development proposals. This work has included a large number of Landscape and Visual Appraisals (LVA) and Landscape and Visual Impact Assessments (LVIA) for planning applications and Environmental Impact Assessments, and I have given evidence at numerous Public Inquiries and planning Appeal Hearings.

2.2 My practice has acted as landscape consultants to Sherbourne Wexcombe Ltd for the Appeal Site for a period of some 16 months. In the course of this work I personally prepared a Landscape Appraisal which formed part of the planning application submitted in July 2023, and which looked at all landscape and visual effects of the development (not just the concerns relied upon by the Council as the basis for its reasons for refusal). [6]

2.3 I am familiar with the Appeal Site (and the surrounding area, having lived near Andover for the past 24 years), and I have visited the Site on numerous occasions in the last 16 months, the most recent being on the 30th of June and the 2nd of July 2024 in order to assess any changes to the baseline situation; and to check on the landscape and visual assessments undertaken.

2.4 I am now instructed in connection with the Section 78 Appeal to provide expert landscape evidence to support the Appellant's case in connection with the Appeal against the refusal of planning permission ref PL/2023/07710. My evidence is given in accordance with the Landscape Institute Code of Practice.

Purpose and Scope of the statement

2.5 My Appeal Statement deals with landscape and visual issues in relation to the Appeal Site proposals, and in particular those aspects of Reasons for Refusal 2 and 3 contained in the Planning Decision Notice submitted by Wiltshire Council in June 2024.

2.6 The planning issues raised in the Council's documents are dealt with in the Statement of Case by Atlas Planning Group; heritage issues raised in the officer's delegated report are dealt with in the Heritage Appeal Note prepared by Mrs Jody O'Reilly of HCUK Group; and a Supplementary Design Statement has also

[6] Refer to the Landscape Appraisal submitted with the Application. (Document Reference: 1072-LVA Rev C 2023-07-17).

been prepared by Mr Nicholas Lowe, the project Architect at Llewellyn Harker Lowe. My evidence should be read in conjunction with the Appellant's Statement of Case and the evidence of my colleagues.

2.7 The following sections of my report are structured as follows:

- Section 3 provides brief details of the Site location and immediate context.
- Section 4 provides details of the planning policy background relevant to the scope of my report.
- Section 5 provides details of changes in the baseline condition of the Application Site and surrounding area.
- Section 6 provides details of the Approved development (the extant scheme).
- Section 7 provides details of the current proposals.
- Section 8 sets out my analysis of the issues arising from the reasons for refusal.
- Section 9 sets out my conclusions.

3 SITE LOCATION AND IMMEDIATE CONTEXT

3.1 The Appeal Site location and a description of the Site are given in the Statement of Case prepared by Atlas Planning Group; in the draft Statement Common Ground prepared for the appeal;[7] and within Section 2 of Landscape Appraisal that accompanied the planning application.[8]

3.2 Following the submission of the application, however, there has been a change to the alignment of the public footpath that crossed the fields immediately south of the Site (ref: GRAF 20). This has been realigned so that it runs along the south side of a small block of woodland to the south-southwest, and then crosses the northern end of the adjacent field as it heads towards Footpath GRAF 13 (just to the south of the group of properties at the southern end of 'Road to Lower Farm').

3.3 As a result the length of footpath with potential views of the Site is some 45m shorter (c.135m now compared to is c.180m previously), and it is now located between approximately 75m (at the eastern end) and 140m (at the western end) further south (further from the Site).

3.4 Ordnance Survey mapping showing both the previous alignment and the new alignment (and an extract of the updated on-line Wiltshire Council Rights of Way Explorer)[9] are contained in Appendix H.

[7] Draft Statement of Common Ground, Section 2.

[8] Document Reference: 1072-LVA Rev C 2023-07-17.

[9] See: https://wiltscouncil.maps.arcgis.com/apps/webappviewer/index.html?id=43d5a86a545046b2b59fd7dd49d89d22

4 PLANNING POLICY BACKGROUND

4.1 Planning policies relevant to the Appeal are set out within Section 5 of the Draft Statement of Common Ground.

4.2 The policy background relevant to the landscape and visual aspects of this application are also set out in Section 3 of the Landscape Appraisal undertaken for the planning application.[10]

4.3 This sets out the national statutory context with reference to the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG); and the local policy context with reference to the Wiltshire Core Strategy (adopted January 2015), The Wiltshire Housing Site Allocations Plan (adopted February 2020), Saved Policies of the Kennet Local Plan 2011, and policies within the Minerals and Waste plans.[11]

4.4 It also considers 'policies' within the North Wessex Downs AONB Management Plan 2019 – 2024 (2019) which supports the development plan, and makes reference to a number of Position Statements and Guidance Notes which have also been published by the AONB Partnership

4.5 Section 4 of the Landscape Appraisal also makes reference to existing Landscape Character Assessments used in the preparation of the Landscape Appraisal, and which were referenced in the preparation of the landscape baseline.

[10] Additional policies are contained within the Planning Statement prepared for the application by Atlas Planning.

[11] There is no Neighbourhood plan covering Wexcombe. The hamlet falls within the Grafton Parish designated Neighbourhood Plan area, but the plan is in its early stages and is not yet 'Made'.

5 BASELINE STUDY

5.1 Visual baseline

5.1.1 The visual baseline for the Appeal Site proposals is described in Section 5 (page 9) of the Landscape Appraisal. It includes a description of the visibility of the Site within the surrounding landscape (supported by a drawing showing the estimated Zone of visual Influence (ZVI) of the proposals) and the potential visual receptors within both the public and private domain.

5.1.2 Generally speaking, the visual baseline has not changed since the writing of this document, however, as noted in paragraphs 3.2 to 3.4 above the length of Footpath GRAF 20 crossing the fields immediately to the south of the Site has been re-aligned, and revised viewpoint assessments (including a description of the existing view) have therefore been prepared for Viewpoints 4, 5 and 6 (referenced as Viewpoints 4a, 5a and 6a) and are included within Appendix I.

5.2 Landscape (or environmental) baseline

5.2.1 The landscape (or environmental) baseline for the proposals is described in Section 6 (pages 11 and 12) of the Landscape Appraisal.

5.2.2 This is a record of the state of the landscape within the Study Area in which 21 key constituent elements of the landscape that contribute to its character have been recorded under three broad headings of Physical Influences, Influences of Human Activity, and Aesthetic and Perceptual Factors.

5.2.3 Other than the relocation of Footpath GRAF 20 mentioned above, the landscape baseline remains current. No other changes have occurred to the Site or surrounding landscape characteristics.

6 THE APPROVED (EXTANT) DEVELOPMENT

6.1 Introduction

6.1.1 A description of the extant scheme is contained within Section 7 (page 13) of the Landscape Appraisal which accompanied the application, and the drawings which were approved are contained within Appendix A to the Appraisal document.

6.1.2 The proposal was essentially for a Class 3 conversion of the existing (modern) agricultural barn that sits on the upper part of the Site into a 5 bedroom dwelling with associated chapel restoration, a double garage, parking and garden areas.

6.1.3 The footprint of the building measures 318m^2 (as taken from the topographical survey of the site). [12]

6.1.4 Heights of the building are not shown on the application drawings prepared by Anne Swift Architects, but the levels of the existing barn are shown on the topographical survey that was submitted with the current application. Using this survey information the essential levels are as follows:

i. Ridge level = 195.26m Above Ordnance Datum (AOD).

ii. Eaves levels (northwest and southeast elevations) = 191.15m / 191.10m AOD.

iii. Threshold level at the entrance doors on the northeast elevation = 187.86m AOD.

iv. Ground levels northwest elevation = between 189.79m AOD (northernmost corner) and 190.02m AOD (westernmost corner).

v. Ground levels southwest elevation = between 190.02m AOD (westernmost corner) and 187.64m AOD (central Threshold).

vi. Ground Level southeast elevation (against the adjacent range of brick barns) = between 187.71m AOD (southernmost corner) and c. 186.90m AOD (easternmost corner).

6.1.5 The building therefore measures approximately 5.36m from adjacent ground level to ridge on the northwest elevation (which is part cut into the adjacent ground), and approximately 7.5m from ground level to ridge on the northeast and southwest elevations, with the finished floor level at approximately 187.80m AOD and the ridge level at 195.26m AOD.

6.1.6 Areas of glazing were proposed on all elevations, and five rooflights were proposed, two each on the northwest and southeast facing roof planes at upper level (close to the ridge), and one large roof light was proposed above the third bedroom on what appears to be an area of flat roof. A significant vertical

[12] Topographical Survey by DANDO surveying ltd.

window also appears in the southeast elevation at roof level (adjacent to the flat roof).

6.1.7 The converted structure was proposed to be built using the existing steel columns, frames and trusses (stripped and painted), with external materials listed as follows:

i. Corrugated grey metal sheet roofing.

ii. Untreated timber vertical cladding to the upper elevations.

iii. Rendered blockwork on the lower elevations.

iv. Steel windows and doors (colour not specified).

6.1.8 No details of the materials were shown on the proposed garage drawing, and other than a note confirming removal of the southern end of the track and reference to the southern end of the site as 'lawn', no further information was provided on the proposals for the garden. For further details refer to Section 7 and Appendix A of the Landscape Appraisal.

7 THE PROPOSED DEVELOPMENT

7.1 Introduction

7.1.1 A description of the proposals is contained within Section 8 (page 15) of the Landscape Appraisal which accompanied the application.

7.1.2 The proposal is for a five bedroom dwelling (plus a guest / staff bedroom) that is deliberately contemporary in character, set into the property away from the road frontage and at a lower level on the Site than the existing barn / extant dwelling.

7.1.3 The building has been carefully sited to avoid encroachment of the dwelling beyond the natural enclosure provided by trees on the northwest and southeast sides of the Site, and consists of two elements in plan; the 'main dwelling' which is two storeys in height and takes the form of an elevated black timber clad, flat roofed, box hovering over a recessed brick base; and a single storey garage wing set at an obtuse angle to the main built element on the northeast side of the main dwelling.

7.1.4 The footprint of the building measures 310m^2 at ground level (361m^2 taking the overhanging first floor into account), and levels are as follows:

i. Roof level (main dwelling) = 190.915m Above Ordnance Datum (AOD).

ii. Ridge level (garage wing) = 189.00m AOD.

iii. Ground Level throughout = 184.415m AOD.

iv. Underside of first floor (overhang level) = 187.33m AOD.

7.1.5 Proposed ground levels in the parking area and on the terrace to the southwest of the main house are at 184.40m AOD, but to the rear of the garage the existing ground drops away and the path is proposed at 183.45m AOD; and the main dwelling is set into the hillside at the northwest end such that it would be cut in nearly a full storey (ground level c.186.40m AOD).

7.1.6 The building therefore measures 6.5m[13] from surrounding ground level to roof level on the southwest, southeast and northeast elevations of the main dwelling (and 4.515m on the northwest elevation where it is part cut into the hill), with the ridge of the garage set 1.915m below this. The roof of main dwelling is also some 1.565m below the ground level at the highest point of the existing access at the northwest corner of the Site (192.48m AOD); approximately 200mm below the eaves of the existing barn (extant dwelling); and only approximately 235mm above the ridge level of the existing chapel which acts as a terminus to the southwest end of the adjacent stable courtyard (average 190.68m AOD).

[13] 7.85m to top of the chimney.

7.1.7 Areas of glazing are limited largely to the northeast and southwest and elevations (where they are significant) but the ground floor sits beneath the overhang of the upper level, the windows of bedrooms 1 and 2 and the hall on the upper level are recessed behind a balcony (and under the overhanging roof), and bathroom windows at the upper level are screened by vertical louvres to restrict light pollution; and where windows do exist on the northwest elevation of the main dwelling and on the southeast elevation they would be screened in the immediate foreground by the trees on both sides of the Site. Rooflights are limited to two small areas in the centre of the main dwelling.

7.1.8 Materials on the dwelling have been chosen to reflect those found within the surrounding landscape and include charred vertical timbers at upper level on the main element of the dwelling (chosen to reflect the materials used on traditional barns within the surrounding landscape) and a long format red brick chosen to reflect those used on the adjacent stable courtyard at the lower level; a green 'sedum' roof with a dark grey zinc trim on the main element of the building; and red brick under a dark grey zinc standing seam roof on the garage wing.

8 ANALYSIS OF THE ISSUES ARISING AND CONSIDERATION OF THE REASONS FOR REFUSAL

8.1 Introduction

8.1.1 This section of my evidence deals specifically with the visual and landscape character issues in relation to the Appeal Site proposals and in particular those issues relevant to the impact on the character of the locality and wider area (including the North Wessex Downs National Landscape) insofar as these are advanced in Reasons 2 and 3 of the Council's decision notice (and as set out in the Officer's delegated Report).

8.1.2 In this section I have set out and responded to the specific issues contained within these Reasons for Refusal. Comments on the alleged policy contraventions and the planning matters raised in the Reason for Refusal 1 are contained within the Statement of Case prepared by Atlas Planning Group.

8.1.3 Heritage matters raised in the Officer's Delegated Report are dealt with by the Heritage Appeal Note of Mrs Jody O'Reilly.

8.2 Reasons for Refusal

8.2.1 Wiltshire Council's Reasons for Refusal 2 and 3 state:

> *"2 The proposal, by reasons of the location, scale, building form and design would result in the creation of a large and overly urban building within the North Wessex Downs National Landscape that would fail to respect the distinctive character of the locality and wider area contrary to the aims of core policies 51 and 57 of the Wiltshire Core Strategy and the planning policy advice of the National Planning Policy Framework.*
>
> *3 The proposal, by reasons of the location, scale and design, incorporating large window openings into the north-west and south-eastern elevations,[14] would fail to protect the special characteristics and dark skies of the North Wessex Downs National Landscape contrary to the aims of core policies 51 and 57 of the Wiltshire Core Strategy and the planning policy advice of the National Planning Policy Framework."*

[14] It is assumed that this should refer to the southwest and northeast elevations.

8.2.2 Breaking down the reasons for refusal, and remembering the extant scheme, the assertions and allegations made are that:

i. **The location of the proposed house on the site is somehow less favourable than the extant scheme and would somehow fail to respond to the distinctive character of the locality and wider area and protect the special characteristics of the North Wessex Downs National Landscape.**

ii. **The scale of the proposed house is greater than the extant scheme and to a degree that is inappropriate in the locality and the wider area, and fails to protect the special characteristics of the North Wessex Downs National Landscape.**

iii. **The building form and design would result in the creation of an overly urban building that would fail to respond to the distinctive character of the locality and wider area and to protect the special characteristics of the North Wessex Downs National Landscape.**

iv. **The building location, scale and design incorporating "large window openings" on the southwest and northeast elevations[15] would fail to protect the dark skies of the North Wessex Downs National Landscape.**

8.2.3 I will deal with each of these items in turn, starting with:

8.3 **Is the location of the proposed house on the site less favourable than the extant scheme and would the location fail to respond to the distinctive character of the locality and wider area and fail to protect the special characteristics of the North Wessex Downs National Landscape?**

8.3.1 Considering the issue of location, it is plainly accepted that the current scheme moves the proposed building from the Site frontage into the centre of the Site.

8.3.2 This has been done (inter alia) to take advantage of the site levels and surrounding trees, and to reduce the potential visual effects of the dwelling.

8.3.3 The resultant scheme creates a building whose roof is at approximately the same topographical level as (in fact slightly lower than) the eaves of the extant dwelling / existing barn, and where the roof of the proposal is some 4.345m below ridge line of the existing building (current scheme at 190.915 / extant scheme at 195.26).

8.3.4 This results in a scheme that, combined with the proposed native hedgerow along the site frontage (a requirement of the landscape officer in his 2021

[15] Elevations referenced have been amended from Reasons for Refusal. See footnote 15 above.

comments on the extant scheme proposals[16] and subsequently referenced in his comments on the current scheme),[17] would be largely screened from the lane passing the Site frontage (the only exception being when looking directly down the proposed driveway), and would improve the views along the lane (see Landscape Appraisal Viewpoints 2 and 3); and compared to the extant scheme there would be no visibility of the proposed building from the centre of Wexcombe.

8.3.5 It would also result in a scheme that (unlike the extant scheme) would be completely hidden from the National Landscape to the north of the Site (a beneficial effect), albeit given the distances to the viewpoints in which the existing building is visible the effects of this benefit were judged to be neutral in the Landscape Appraisal undertaken. (Refer to Viewpoints 15, 16 and 17 of the Landscape Appraisal).[18]

8.3.6 In the Delegated Report whilst acknowledging that "*the application site is set within a depression, with long distance views mainly screened*"[19] and that the "*new building would be less prominent than the existing barn";*[20] and acknowledging that the revised location "*is noted as a positive by the Council's Landscape Officer*";[21] the Planning Officer states that "*the new dwelling would be much more visible within wider views from the southwest obscuring views of the historic farmstead*". [22] [emphasis added]

8.3.7 There is no mention of the pre-application support for the revised location which states that "*the current proposal takes advantage of the topography by sitting at a lower level enabling a better relationship with the listed building, existing built form and the receiving landscape*"[23] [emphasis added]; there is no direct acknowledgement from the Officer himself of the beneficial views from the north (both close up on the lane and from the wider landscape); and there is no discussion or analysis around the lengths of path that the proposals would be seen from to the southwest, or the effects that would be experienced.

8.3.8 In reality there are only two public footpaths within the Zone of Visual Influence to the south of the proposals, GRAF 13 which climbs Wexcombe Down to the south-southeast, and GRAF 20 which crosses the fields to the south of the Site (and which, as noted in Section 3 above, has recently been moved); there was

[16] Copy in Appendix C.4

[17] Landscape Officer's Comments dated14th November 2023. First paragraph. Copy in Appendix A.3.

[18] Landscape Appraisal. Pages 34 to 36.

[19] Officer's Delegated Report, Page 7, Paragraph 6.7, 3rd last line. Copy in Appendix A.2.

[20] Officer's Delegated Report, Page 12, Paragraph 6.33 2nd line. Copy in Appendix A.2.

[21] Officer's Delegated Report, Page 7, Paragraph 6.8, 3rd line. Copy in Appendix A.2.

[22] Officer's Delegated Report, Page 7, Paragraph 6.8, 4th line. Copy in Appendix A.2.

[23] Wiltshire Council's Pre-Application response dated 9th June 2023, Page 3, 5th Paragraph. Copy in Appendix B.1.

only a short stretch (c.150m) of the previous Footpath GRAF 20 (crossing the fields directly to the south of the Site) where the views of the farm courtyard building beyond would have been obscured or partially obscured by the proposal and where there would have been some slight to moderate adverse effects on receptors (see Landscape Appraisal Viewpoints 4 to 6); and only a short (c.250m) stretch of footpath GRAF 13 where it climbs the hill to the south where the proposals would be seen (giving rise to slight adverse effects – see Landscape Appraisal Viewpoints 11 and 13).

8.3.9 From the majority of Footpath GRAF 13 views are either contained by lane-side hedgerows (see Viewpoints 9 and 10) or the form of the hillside (Viewpoint 12), and from the area of the ZVI to the east of the site the current proposals would be screened (and compared to the extant scheme effects would be beneficial – see Viewpoints 7 and 8).

8.3.10 From the relocated length of Footpath GRAF 20, however, at worst effects on receptors would be slight adverse in winter, and in summer effects would be neutral or slightly beneficial.[24] As noted in paragraph 3.2 above the relocated footpath is located between 75m and 140m further south, and the effects of this combined with some additional intervening vegetation and a change in elevation means that effects on receptors using the relocated Footpath would fall (and in addition the length of the path from where views are available is some 45m shorter than the previous Footpath).

8.3.11 The current proposals would not be *"much more visible within wider views from the southwest"* (as set out in the Officers Delegated Report, paragraph 6.8),[25] and there are almost no views of the stable yard that would be obscured (refer to the revised viewpoint sheets in Appendix I.2). The effects of the proposals on visual receptors in the landscape to the south of the Site would, in fact, be very small, and I stand by the judgement set out in the Landscape Appraisal at paragraphs 11.23 to 11.25 as follows:[26]

> "*Overall, the effects of the proposed development on receptors in the surrounding landscape would be very limited. Views of the proposed dwelling are restricted by surrounding vegetation, adjacent built form and the effects of topography to a restricted area; and there would be beneficial effects associated with the removal of the existing barn (extant dwelling) as seen from the adjacent lane and from the centre of Wexcombe to the northeast, and (to a lesser degree) from the Vale of Pewsey further to the north.* [and east]
>
> *Whilst there would be some adverse effects associated with the proposals when seen from the footpaths to the south, these would be appreciated from a few locations by a limited number of receptors, and the majority of effects would only be at slight adverse levels.*

[24] Refer to the revised viewpoint assessment sheets contained within Appendix I.2.

[25] Officer's Delegated Report, Page 7, Paragraph 6.8, 4th line. Copy in Appendix A.2.

[26] Refer to the Landscape Appraisal submitted with the application, Page 40.

*Bearing all this in mind, effects on **overall visual amenity**[27] (taking into account the extent of the ZVI, numbers of potential receptors, and effects across all potential viewpoints (including the beneficial effects discussed above)) are judged to be **NEUTRAL**. The limited adverse effects experienced by receptors to the south of the Site are balanced by the beneficial effects experienced from the lane to the north and the footpaths crossing the fields to the east."*

Effects of location on the character of the locality

8.3.12 In terms of responding to the distinctive character of the locality, as a consequence of the location of the current proposals on the plot, the current proposals would barely be seen from the road passing the site, and would:

i. Reinforce the character of the lane through use of a native lane-side hedgerow (as requested by the Landscape Officer in his response to the proposals).

ii. Remove the large modern agricultural barn from the immediate context of the historic courtyard (refer to Section 4, paragraph 9 of my colleague Jody O-Reilly's Heritage Appeal Note), opening up views of the historic farm courtyard buildings when approaching Wexcombe along the lane from the west and (as noted by the Landscape Officer) "*reducing its impact on the village gateway*".[28]

iii. Open up views towards Wexcombe Down from the lane when passing the Site (Refer to the Landscape Appraisal assessment of Viewpoint 2).[29]

iv. Provide very slight visual benefits as seen from Pewsey Vale to the north. (Refer to Landscape Appraisal Viewpoints 15 to 17).[30]

v. Provide slight visual benefits from Footpath GRAF 20 to the east of the Site. (Refer to Landscape Appraisal Viewpoints 7 and 8).[31]

8.3.13 Whilst there would be some slight adverse visual effects from the footpaths to the south of the Site (as discussed in paragraphs 8.3.8 – 8.3.11 above) it is my judgement (and it appears to be that of the Council's Landscape Officer), that when compared to the extant scheme there would be an overall improvement to the local context as a consequence of the revised location of the proposals further into the Site, a judgement that is also supported by the comments of the pre-application response, which in considering the design of the scheme stated that "*the current proposal takes advantage of the topography by sitting at a lower*

[27] Meaning the overall pleasantness of the views that receptors enjoy of their surroundings.

[28] Landscape Officer's Comments dated 14th November 2023, First paragraph. Copy in Appendix A.3.

[29] Landscape Appraisal, Viewpoint 2, Page 21.

[30] Landscape Appraisal, Viewpoints 15 to 17, Pages 34 - 36.

[31] Landscape Appraisal, Viewpoints 15 to 17, Pages 26 - 27.

level enabling a better relationship with the listed building, existing built form and the receiving landscape."[32]

Effects of location on the character of the wider area and the special characteristics of the North Wessex Downs National Landscape

8.3.14 In terms of responding to the distinctive character of the wider area and the special characteristics of the North Wessex Downs National Landscape, all of the above-mentioned benefits of the location of the current building also apply.

8.3.15 Whilst neither the decision Notice nor the Officer's Report make it clear what is meant by the "*Special Characteristics*" mentioned in the decision notice, 'Special qualities' of the North Wessex Downs AONB are set out in the North Wessex Downs AONB Management Plan at the end of 8 thematic chapters,[33] and these are followed by the Key Issues relating to each theme; Strategic Objectives for the Plan period; and the AONB Policies to support these objectives which are intended to guide and inform the policies and actions of all members of the North Wessex Downs Partnership.

8.3.16 Whilst the 'Special Qualities' identified in the 'Landscape' Chapter of the AONB Management Plan refer to Landscape Character Types (rather than specific elements of the landscape per-se), throughout these chapters references are made to elements of the landscape that contribute to its character including geology, soils, vegetation, landform / topography, drainage / water bodies, heritage assets, land use / management, settlement pattern / character of settlement, character of buildings / built form, lighting, access / movement, landscape pattern, cultural elements, scale, complexity, degree of enclosure / openness, tranquillity, wildness, remoteness and sense of place, all of which have been considered in the Landscape Appraisal submitted with the application under the headings of Physical Influences, Influences of Human Activity, and Aesthetic and Perceptual Factors.[34]

8.3.17 As noted in Section 10 of the Landscape Appraisal (paragraph 10.5),[35] the key issue associated with these proposals is the nature of the built form (which I will deal with below) and there is nothing in the AONB Management Plan to suggest that there is anything detrimental associated with locating the dwelling further into the Site (with all the advantages identified in paragraph 8.3.12 above).

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[32] Wiltshire Council's Pre-Application response dated 9th June 2023, Page 3, 5th Paragraph. Copy in Appendix B.1.

[33] The chapters are Landscape (p23), Rural Land Management (p32), Biodiversity (p46), Historic Environment (p55), Natural Resources (p66), Development (p78), Communities (p86), and Tourism, Leisure and Access (p94). Copy in Appendix J.1.

[34] Landscape Appraisal, Pages 11 – 12 (baseline) and page 38 (assessment of effects on Landscape Character).

[35] IBID. Page 38.

8.3.18 Indeed, there are innumerable examples of buildings set back from a road frontage within the AONB (including within Wexcombe itself),[36] and whilst buildings close to the road are also found this is not uncharacteristic of the AONB landscape.

8.4 **Is the scale of the proposed house greater than the extant scheme and to a degree that is inappropriate in the locality and the wider area, and fails to protect the special characteristics of the North Wessex Downs National Landscape.**

8.4.1 In terms of the scale of the proposed dwelling, although the Landscape Officer's perception of the scheme was clearly one of a "*modern designed residential building of a smaller scale set away and at a lower level than the existing barn reducing the impact on the surrounding landscape";*[37] and the Conservation Officer was clear that in her opinion that "*the proposed buildings feature simple forms and materials which are appropriate to the area and a scale which is not at odds with many agricultural buildings*";[38] at paragraph 6.9 whilst discussing the "*modern reinterpretations of existing buildings"* the Planning Officer makes it clear that in his opinion "*the proposed dwelling is not considered to fall within this design approach due to the scale, form, and use of the proposed materials".*[39] [emphasis added]

8.4.2 At paragraph 6.10 of the Delegated Report the Officer then goes on to say that "*the new building would be seen as a much more prominent building within the backdrop of the historic farmstead and within the setting of the listed farmhouse. The two-storey section would extend above the rear wall (and ridgelines) of the adjacent farmstead and (particularly at night) it would be visible as a large urban form of building, at odds with the form and scales of the traditional buildings that would be seen in very close proximity*"; and at paragraph 6.19 whilst discussing heritage impacts the Officer states that "*officers consider the proposed scale, form and design of the two-storey section of the new building would be harmful in terms of overall design and landscape character impact*"[40] (although at the end of this paragraph he acknowledges that the overall conservation impact is considered to be neutral). [emphasis added]

8.4.3 Whilst I will deal with the issues surrounding materials, lighting, form and design of the property later, the issue of scale is addressed below.

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[36] For example 'Wexcombe House' adjacent to the Site, or the recently built 'Wexcombe Farmhouse' adjacent to Lower Farm.

[37] Landscape Officer's Comments dated 14th November 2023, 2nd paragraph. Copy in Appendix A.3.

[38] Conservation Officer's comments on the proposals dated 30th October 2023, Page 3, 4th paragraph. Copy in Appendix A.4.

[39] Officer's Delegated Report, Page 7, Paragraph 6.9, 9th line. Copy in Appendix A.2.

[40] Officer's Delegated Report, Page 9, Paragraph 6.19, 7th line. Copy in Appendix A.2.

8.4.4 Firstly, as noted in paragraph 8.4.1 above, both the Council's Landscape and Conservation Officer are clearly of the opinion that the proposals are not of a scale that would be of concern in the receiving landscape.

8.4.5 Secondly, at the time the Pre-Application advice was given it was clearly the opinion of the Council's Planning Officer (endorsed by the head of development management in whose name the Pre-Application response was written) that *"The scale appears to be acceptable, helped in part by building into the topography and splitting the dwelling into different forms and levels. Ultimately, the plot is accommodating and likely able to accommodate such scale without the appearance of overdevelopment."* [41]

8.4.6 Thirdly, the extant scheme and the current proposals are very similar in size.

i. As noted in paragraph 6.1.3 above, the existing barn / extant scheme measures approximately 318m^2 in plan area. This compares to a measurement of 310m^2 for the current proposals at ground level (see paragraph 7.1.4 above), and 361m^2 taking the overhanging first floor into account (a 16% increase on the existing barn). The footprint of the properties are therefore similar, albeit taken at the upper floor level the current proposals are slightly larger.

ii. In terms of height, however, the existing barn measures approximately 7.5m from ground level to ridge (paragraph 6.1.5 above) compared to a measurement of 6.5m from ground level to the flat roof of the proposed scheme (paragraph 7.1.6), making the barn / extant scheme some 15% taller. Again, the proposals are similar, although in this case the current proposals are slightly smaller.

iii. Considering the two paragraphs above it can be concluded that in terms of overall scale the two buildings are similar, however, as set out in Section 8.3 above, the reduced level (AOD) of the current proposal is critical in terms of the visibility and therefore the prominence of the proposals in the landscape, leading the Planning Officer to acknowledge that "*the new building would be less prominent than the existing barn*",[42] (and it is no doubt the effect of these reduced levels on the perception of the scale of the building that led the Landscape Officer to conclude that the building was of a "*smaller scale*").

Effects of scale on the character of the locality

8.4.7 Moving on to the issue of local context (in terms of scale), the current proposals would not be out of scale with other buildings in Wexcombe. Wexcombe

[41] Wiltshire Council's Pre-Application response dated 9th June 2023, Page 3, 6th Paragraph. Copy in Appendix B.1.

[42] Officer's Delegated Report, Page 12 Paragraph 6.33, 2nd line. Copy in Appendix A.2.

House and Wexcombe Manor would remain the largest residential properties in the village; and the proposals would be significantly smaller than the barns at Lower Farm (refer to aerial photograph on page 4 of the Landscape Appraisal).

8.4.8 Furthermore, in terms of the relationship of the proposals to the adjacent farm courtyard, the garage wing of the proposed building is deliberately at a smaller scale than the main element of the proposals, and it is deliberately positioned to relate to the buildings of the adjacent stable yard (with its ridge level below that of the chapel and adjacent wing of the stable yard).

8.4.9 It is disingenuous of Officer to make a point of the fact "*the two-storey section would extend above the rear wall (and ridgelines) of the adjacent farmstead*"[43] when the roof is only 60 cm, above the ridge of the nearest part of the main stable yard building,[44] and when the ridge line of the existing barn/extant scheme sits nearly 5 metres above the ridgeline of the main range of the stable yard, and in far closer proximity than the current proposals. Whilst the officer points out what he sees as a negative element of the current proposals in terms of relative levels, not only does he not consider the relationship of the alternative scheme to the stable yard (which is far more imposing), but he also completely fails to give consideration to the benefits of the removal of the existing barn (which is an integral part of the current proposals). Indeed, the removal of the existing barn is explicitly "*welcomed*" in the Pre-Application comments.[45] As set out in paragraph 8.3.12 above, removing the large modern agricultural barn from the immediate context of the historic courtyard and opening up the views of the historic farm courtyard buildings when approaching Wexcombe along the lane from the west should be acknowledged as a positive element of the scheme, not simply ignored.

Effects of scale on the character of the wider area and the special characteristics of the North Wessex Downs National Landscape

8.4.10 As noted in paragraph 8.3.16 above, the Landscape Appraisal submitted with the application has considered the key characteristics of the landscape (including scale) and concluded that "*there would be no effects on scale or complexity* [as] *residential scale buildings are already present as part of the landscape*".[46]

8.4.11 In terms of both the wider area and AONB context this is clearly the case. Not only is the building similar in scale to the extant scheme and compatible with buildings within Wexcombe (as set out above), but the scale of the proposed

[43] Officer's Delegated Report, Page 8, 4th line (Paragraph 6.10). Copy in Appendix A.2.

[44] The roof of the main element of the proposal at 190.915mAOD is only 605mm above the nearest part of the roof of main range of the stable yard = 190.31mAOD.

[45] Wiltshire Council's Pre-Application response dated 9th June 2023, Page 3, 9th Paragraph. In discussing the existing building the comments state that "*Its removal as part of this scheme would be welcomed*". Copy in Appendix B.1.

[46] Landscape Appraisal, Page 38, Paragraph 10.4 final bullet point (top of right column).

building is perfectly in keeping with innumerable buildings throughout the surrounding landscape.

8.4.12 Irrespective of any discussions over the design of the property which uses both the site levels and the different elements of the structure (such as the offset garage wing and recessed ground floor) to break down the scale of the built form, there are many residential properties in the AONB that are of a significantly larger scale than the proposed dwelling.

8.4.13 Furthermore, the proposed property deliberately references the existing and former barns found on the Site (and in the wider landscape) in both its form and materials, and this in itself creates the expectation of a certain scale. As noted by the Conservation Officer, "*the proposed buildings feature simple forms and materials which are appropriate to the area and a scale which is not at odds with many agricultural buildings*".[47]

8.4.14 There is nothing untoward or out of scale with the current proposals (it is not a "*large scale urban extension*"[48] as discussed in the AONB Management Plan), and given the existing barn on Site and other buildings in the area its scale would have no effects on the surrounding landscape character.

8.5 **Would the building form and design result in the creation of an overly urban building that would fail to respond to distinctive character of locality and wider area and to protect the special characteristics of the North Wessex Downs National Landscape?**

8.5.1 In terms of the building form and design, at paragraph 6.8 of the Delegated Report whilst discussing the "*the larger oblong section of the building*" the Planning Officer states the following:

> "*It would appear as a substantial rectilinear structure of an urban type of architecture not expected to be encountered within the NWD landscape. It is acknowledged the footprint would reflect a relatively simple layout akin to many farm buildings but, above ground it's urban appearance (with very large window openings), bulky roof form and overly large massing at first floor level would be at odds with the converted farm buildings (that would sit between it and the public highway) and the listed farmhouse.*" [49]

8.5.2 Paragraph 6.9 of the Delegated Report then goes on to say that *"the new building would involve some use of natural materials with vertical charred timber cladding and a green roof. The lower walls would be red brick to echo the adjacent historic*

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[47] Conservation Officer's comments on the proposals dated 30th October 2023, Page 3, 4th paragraph. Copy in Appendix A.4.

[48] North Wessex Downs AONB Management Plan 2019-2024, Page 76, Paragraph 7.24 Copy in Appendix J.1.

[49] Officer's Delegated Report, Page 7, Paragraph 6.8, 7th line. Copy in Appendix A.2.

farmstead. However, the materials would be used within a large, urban form of building using modern construction techniques"; [50] and paragraph 6.10 States "*it would be visible as a large urban form of building, at odds with the form and scales of the traditional buildings that would be seen in very close proximity*." [emphasis added]

8.5.3 Finally, in considering the fall-back position, the Officer refers to "*the overly suburban architecture of the new building and large domesticated plot comprising its surroundings*",[51] and states that "*whilst the new building would be less prominent than the existing barn, it would introduce an overly urban form of architecture into the landscape and setting of the nearby listed farmhouse and associated structures*".[52] [emphasis added]

8.5.4 Whilst my colleague Mrs Jody O'Reilly deals with the heritage matters raised in these paragraphs (and Mr Nicholas Lowe considers the architecture of the proposals in his statement), numerous other points are included here, and I will deal with them one by one:

8.5.5 Firstly, the current proposals are neither urban nor suburban. They are contemporary:

i. Urban architecture takes many forms and includes everything from (inter alia) commercial buildings, tower blocks and flats, to streets of terraced properties. 'Suburban' relates to the suburbs, and tends to be lower density and contain streets of detached or semi-detached properties on the edges of towns and cities. Rural areas tend to contain detached and semi-detached properties and are lower densities again, although occasional terraces and denser clusters of buildings will be found in villages. All of these (urban, suburban and rural) can contain both traditional architecture as well as contemporary buildings.

ii. There is nothing about a detached property or contemporary architecture (such as is the case with these proposals) that makes it urban, and there is certainly nothing in legislation that says that contemporary architecture is inappropriate in a rural environment. Indeed there are many good examples of award winning contemporary buildings in rural locations, one prominent example being the 'Flint House' on the Rothschild estate in Buckinghamshire which won the 2015 RIBA house of the year award; and a second being the award winning house referenced by Mrs O'Reilly in paragraph 26 of her Heritage Appeal Note.

8.5.6 This leads onto the next issue raised here, which is in relation to the contemporary nature and quality of the proposed architecture.

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[50] Officer's Delegated Report, Page 7, Paragraph 6.9, 4th line . Copy in Appendix A.2.

[51] Officer's Delegated Report, Page 11, Paragraph 6.28, 2nd line. Copy in Appendix A.2.

[52] Officer's Delegated Report, Page 12, Paragraph 6.33, 2nd line. Copy in Appendix A.2.

i. The Delegated Report at paragraph 6.9 states that "*The LPA is not averse to modern reinterpretations of traditional buildings (using traditional materials and building techniques within a modern design approach). However, the proposed dwelling is not considered to fall within this design approach due to the scale, form, and use of the proposed materials. As such, it would be substantially out-of-character when viewed within with surrounding rural environment (which the converted barn would not be).*"[53]

ii. There is no assessment of the quality of the architecture in comparison to the extant scheme despite the acknowledgement in the Pre-Application response that "*the proposed dwelling would be of a higher quality design than the extant permission.*"[54]

iii. In design terms the current proposals are clearly of greater merit than the extant scheme which is restricted by the limitations of converting an existing agricultural building and which, like so many similar conversions, results in a poor-quality design rather than a well thought out and beautifully executed piece of architecture. The current scheme uses the form, materials, and detailing as well as the location on Site and effective landscaping to create an attractive and clearly contemporary building which is sympathetic to its surroundings whilst not shying away from its contemporary approach.

iv. Such an approach is supported by paragraph 135 of the NPPF which, in calling for well-designed and beautiful places, sets out that "*Planning policies and decisions should ensure that developments*:

> *b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
>
> *c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);"* [emphasis added]

v. High standards of design and innovation are also supported by the Council's own planning policies and by the AONB Management Plan which sets out their approach to the provision of new housing in Theme 6, 'Development'. This refers to the AONB Position Statement on housing and includes the statement that "*Good design and siting of all new developments in the North Wessex Downs is essential. They should reflect the local landscape character and architecture and make use of local materials*."[55] [emphasis added]

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[53] Officer's Delegated Report, Page 7, Paragraph 6.9, 7th line. Copy in Appendix A.2.

[54] Pre-Application Response, Page 3, 4th paragraph. Copy in Appendix B.1.

[55] AONB Management Plan 2019-2024, Page 76, paragraph 7.25. Copy in Appendix J.1.

vi. Also, Policy DE02 of the North Wessex Downs AONB Management Plan, whilst encouraging traditional building styles, *"Encourage*(s) *high standards of design, comprehensive landscaping where required, …, energy conservation and innovation that respect historic settlement patterns and the distinctive character of the North Wessex Downs";*[56] and there are numerous references to "*the very best design*",[57] or "*high standards of design as befits a nationally designated landscape*"[58] in the AONB's Position Statement on housing. [emphasis added]

vii. Key to all these statements are the use of the words "*sympathetic*", "*reflect*", "*respect*" and the encouragement of "*innovation*". Good design and innovation is clearly encouraged, and whilst there are references to traditional building styles and local traditions, there is nothing to say that the design of houses has to be the same as those that surround it, or to discourage the use of high quality contemporary architecture.

viii. Indeed Historic England often encourages the use of contemporary architecture as a 'foil' to Listed Buildings and to ensure to a clean break is established between old and new, and as discussed by my colleagues Mr Nicholas Lowe in his Supplementary Design Statement and Mrs Jody O'Reilly in her Heritage Appeal Note,[59] this is precisely why a contemporary scheme has been proposed in this location.

8.5.7 Moving on, the next issue relates to the use of materials and modern construction techniques. As noted in paragraph 8.5.2 above paragraph 6.9 of the Delegated Report states that "*the new building would involve some use of natural materials with vertical charred timber cladding and a green roof. The lower walls would be red brick to echo the adjacent historic farmstead. However, the materials would be used within a large, urban form of building using modern construction techniques*".

i. There seems to be acceptance here that materials would not be out of place in this landscape (which is no great surprise given that the bricks have been specifically chosen to reflect ("*echo*") the adjacent historic stable yard and the black timber cladding has been chosen to reflect the use timber found on barns throughout this landscape); and I can think of no reason to suggest that modern construction techniques are inappropriate in what is a new building after all. There is no listing or heritage reason which might suggest that modern construction techniques would somehow be inappropriate.

[56] AONB Management Plan 2019-2024, Page 81, Policy DE 02. Copy in Appendix J.1.

[57] AONB Position Statement on Housing, Page 3, Paragraph 6. Copy in Appendix J.2.

[58] AONB Position Statement on Housing, Page 9, Paragraph 323 (ii). Copy in Appendix J.2.

[59] Heritage Appeal Note by Mrs Jody O'Reilly. Page 3 Paragraph 11.

ii. Indeed in considering the proposed materials the Pre-Application response stated that "*it is welcomed to see materials that although contemporary in nature, take cues from the site and historic buildings whilst ensuring a clean break is established between old and new*", [60] and the Conservation Officer in considering the application also stated that "*the proposed buildings feature simple forms and materials which are appropriate to the area*".[61] [emphasis added]

8.5.8 Finally, there is no basis on which to criticise the scheme for having a "*large domesticated plot*". [62] There is no difference between the extant scheme and the current proposals in terms of the plot size and intended use. The size of the domestic curtilages are effectively identical, and both would be residential in nature. It is wrong to suggest that the effects of the plot would be any different to those associated with the extant scheme, a point acknowledged by the Conservation Officer who confirms that "*whilst the proposals will result in the domestication of the site, this will have no greater impact than the approved conversion of the remaining agricultural building*".[63] In fact given the location of the dwelling in the current proposals, and the proposed hedges and orchard along the road frontage, the effects of domestication around the building are far more likely to be appreciated with the extant scheme (where the effects of domestication around the building would be clearly visible from the immediately adjacent road).

8.5.9 Overall, as set out in paragraph 10.5 to 10.6 of the Landscape Appraisal which accompanied the application, the key issue with these proposals is one of the nature (and quality) of the built form (permission for a dwelling already exists, and the proposal is within the existing settlement on a previously developed site). As set out in the Landscape Appraisal:

> *"... whilst the proposed dwelling would introduce a 'non-traditional' (or contemporary) style of architecture into the hamlet, this is not a bad thing per-se. The building would be highly sustainable and of a very high quality, would reflect a modern approach to design, and would replace a converted barn of very little architectural merit. The Site (and Wexcombe generally) does not fall within a Conservation Area and sits in a hamlet already made up of varying architectural styles and materials including two storey houses made of brick, brick and flint, and (in one case) painted render under slate, clay, concrete and thatched roofs; and architectural styles already vary from the Manor House and traditional brick / brick and flint*

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[60] Pre-Application Response, Page 3, 6th paragraph. Copy in Appendix B.1.

[61] Conservation Officer's comments on the proposals dated 30th October 2023, Page 3, 4th paragraph. Copy in Appendix A.4.

[62] Officer's Delegated Report, Page 11, Paragraph 6.28, 3rd line. Copy in Appendix A.2.

[63] Conservation Officer's comments on the proposals dated 30th October 2023, Page 3, 4th paragraph. Copy in Appendix A.4.

thatched cottages in the centre of the hamlet to more modern brick and / or rendered properties along the 'Road to Lower Farm'.

Whilst the contemporary design would represent a departure from the established built form found within Wexcombe, and is not 'traditional' either in the sense of it being 'the same as', or trying to copy existing buildings found within the village, its location on the Site means that it would sit back from and barely be noticed from the lane or the wider village, and it avoids any attempt at pastiche. Instead the building reflects a modern approach to sustainable buildings that has the potential to enhance the cultural heritage of the village and (to a small extent) the surrounding AONB."

8.6 **Would the building location, scale and design incorporating "large window openings" on the southwest and northeast elevations fail to protect the dark skies of the North Wessex Downs National Landscape.**

8.6.1 In discussing lighting the Delegated Report notes that "*a number of third-party representations have raised concerns over the design of the new building and potential for light pollution to be caused, adversely affecting the dark skies of the NWD*".[64]

8.6.2 In considering this issue the Officer first quotes part of paragraph 7.15 of the AONB Management Plan, and then in paragraph 6.14 of the Delegated Report states that "*The AONB Management Plan further confirms that a key threat to the AONB landscape (see paragraph 7.37 of the Management Plan) is the impact on dark skies from lighting schemes that are poorly designed and directed where there is usually few planning controls to mitigate.*" He then goes on as follows:

"*The LPA would be unable to reasonably control the spill of lighting from the large windows and skylights that are proposed in the new building. This is of particular concern with regard to the design of the south-eastern[65] rear elevation (facing towards Wexcombe Down and nearby public footpaths) that includes a number of very large windows (indeed much of this elevation would be glazed). These windows (along with others) would face out onto the rural landscape, of Wexcombe Down, resulting in the building being seen as a very prominent addition to the village surroundings within a wide range of views, particularly at night and during winter months when trees would not be in leaf to provide some screening. The large openings within the north-western[66] elevation would be visible within the setting of the nearby listed farmhouse and adjacent historic farmstead creating a greater prominence to the building at night,*

[64] Officer's Delegated Report, Page 8, Paragraph 6.12. Copy in Appendix A.2.

[65] It is assumed that this should refer to the southwestern elevation here.

[66] It is assumed that this should refer to the northeastern elevation.

despite it being set further into the site and at a lower level than the highway." [67]

8.6.3 However, the reference to paragraph 7.37 of the AONB Management Plan is not correctly contexted; there is no comparison here to the extant scheme; and there is no analysis of the extent of the areas over which views of the southwest facing windows would be seen.

8.6.4 Dealing with these in turn, Paragraph 7.37 g) of the AONB Management Plan (in discussing key issues with the potential to have significant influence on the AONB's Development Special Qualities) actually talks about the "*impact on dark skies and tranquillity of high-powered external lighting, especially where poorly directed or in an exposed location (not usually subject to planning control*)".[68] It is not talking about light spill from internal lighting.

8.6.5 Similarly, the 'North Wessex Downs AONB Position Statement on Dark Skies and Artificial Light'[69] specifically discusses external lighting (and again makes no reference to internal lighting); and the additional AONB publication titled 'Dark Skies of the North Wessex Downs - A Guide to Good External Lighting'[70] also majors on external lighting, with only one section on page 12 (and for domestic projects, a graphic on page 13 which mentions tinted glass and auto blackout blinds) encouraging the user of the guide to "*think about windows and internal lights*" in the following terms:

"*Allowing daylight into a building is crucial for our circadian rhythm as, with our busy lives, most of us do not get enough daylight. However, light spilling from inside buildings can add significantly to light pollution. In general, internal lights shine horizontally and, in the case of sky lights, directly upwards.*

In order to reduce light pollution from buildings:

- *Ensure windows have curtains or blinds that stop the light spilling out, and that they are used.*
- *Use electronically timed lighting and blinds/shutters. These can be linked to 'smart home' systems to allow flexible operation.*
- *Face glazing into courtyards or nearby associated buildings, rather than towards green spaces or neighbours.*
- *Try 'smart glass', which is made by passing electrical current through the material to change its transparency.*"

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[67] Officer's Delegated Report, Page 8, Paragraph 6.14. Copy in Appendix A.2.

[68] AONB Management Plan 2019-2024, Page 79, paragraph 7.37 g. Copy in Appendix J.1.

[69] North Wessex Downs AONB Position Statement on Dark Skies and Artificial Light, February 2021. Copy in Appendix J.3.

[70] Dark Skies of the North Wessex Downs – A Guide to Good External Lighting, Published by the North Wessex Downs AONB in 2021. Copy in Appendix J.4.

8.6.6 Whilst clearly any light pollution from windows (and in particular from upward facing skylights) is a concern, given these documents it is clear that for the AONB partnership this is secondary to the effects of external lighting.

8.6.7 Turning to the proposals before us, whilst it is clearly correct to acknowledge that the current proposals have larger areas of glazing on the northeast and southwest elevations than the extant scheme, it is also important to take account of the levels and location of the buildings in the landscape, local context (adjacent trees etc), numbers of roof lights, the effects of any external lighting, and other technologies and design elements used on the proposals to minimise light pollution, none of which can be considered in isolation. Working through this list:

i. As discussed in Section 8.3 above, the levels of the proposed building combined with its location in the centre of the Site means that there will be no visibility of the scheme (and therefore no direct views of any lighting) from the Pewsey Vale to the north of the site; and combined with the proposed hedgerow along the Site frontage almost no views from the lane approaching Wexcombe. Lighting from the northeast facing windows will be almost entirely contained to the Site itself, and to limited views from the adjacent stable courtyard.

ii. The current scheme locates the building further into the Site where it is screened to the northwest by the adjacent copse, and to the southeast by the line of established evergreen trees that separates the Site from Wexcombe House. Whilst windows on these elevations are limited in any event, light pollution from these windows will be largely curtailed by this vegetation.

iii. In terms of roof lights, the current proposals has fewer roof lights than the extant scheme (only two as opposed to five on the extant scheme), and light emissions from those proposed will also be controlled through the use of photocell controlled automatic blackout blinds[71] (a technology not included as part of the extant proposals). Even if this technology was to fail or be turned off as suggested by the Officer in the Delegated Report,[72] upward light pollution from skylights would be less with the current proposals (and with the blinds working there would be no light pollution from the skylights whatsoever).

iv. In terms of external lighting, no up-lighting is proposed within the gardens to the south of the current proposals; and any external lighting on the building or within the parking area to the north would be shielded with appropriate cowls and deflectors, would be dark skies and wildlife friendly, and would be specified and positioned in accordance with the

[71] Refer to the Landscape Appraisal submitted with the application, Page 15, Paragraph 8.3 v.

[72] Delegated Report page 9, Paragraph 6.15. Copy in Appendix A.2.

AONB's published guidance.[73] Whilst external lighting can be controlled by condition, this has not been done for the extant scheme and it is therefore quite possible that significant external lighting would be installed as part of the extant dwelling. Either way, any external lighting associated with the current proposals is unlikely to be worse than with extant scheme (and its implementation can also be conditioned if required).

v. In terms of other technologies and design elements used on the proposals to minimise light pollution, the current scheme includes photocell controlled automatic blackout blinds on the skylights (as noted above); the design deliberately includes an overhanging first floor (which will shield / reduce upward light pollution from the majority of the ground floor windows); most of the southwest facing first floor windows have also been set back from the façade (beneath the overhanging roof) to reduce upward light loss; louvres have been located across the northeast and southwest facing bathroom windows to restrict direct views of light from these windows; and a planning condition is suggested in the Atlas Planning Group Statement of Case which would secure the use of either blackout blinds and / or low transmittance glass.[74]

8.6.8 As a consequence of all of the above, upward light emissions (which effect dark skies) would be limited; and furthermore direct views of windows would be restricted to a small area of the landscape to the south of the Site (see Section 8.3.10 – 8.3.11 above). Compared to the extant scheme whilst lighting would be seen from slightly different places in the landscape (with more lighting seen from the south but less from the east and north), the overall effects on landscape character would (in my judgement) be no worse or better with the current proposals.

[73] Refer to the Landscape Appraisal submitted with the application, Page 15, Paragraph 8.3 ix.

[74] For example 'Pilkington Optifloat'. Refer to the Atlas Planning Group Statement of Case, Section 4, Condition 11.

9 CONCLUSIONS

9.1 In conclusion (as set out in the landscape appraisal that accompanied the application), it is my opinion that in comparison to the extant scheme the proposed dwelling would have a neutral effect on overall visual amenity, and that effects on overall landscape character would be slightly beneficial.

9.2 Considered holistically the location of the building would have positive effects on the character of the locality, allowing improvements to the approach into Wexcombe along the lane as well as benefits in terms of opening up views towards Wexcombe Down and removing the existing barn which currently overshadows the historic stable courtyard (whilst also providing some visual benefits from the north and east); and although there would be some slight adverse visual effects on receptors using short sections of the Footpaths to the south of the Site it is my judgment (and appears to be the judgement of the Council's own Landscape Officer and the officers at the Pre-Application stage) that when compared to the extant scheme there would be an overall improvement to the local context.

9.3 In terms of the design the scale of the proposal is similar to the extant scheme and in keeping with buildings found within Wexcombe and elsewhere within the AONB; the proposals are not 'urban' or 'sub-urban'; the materials proposed 'reflect' and are sympathetic to their surroundings; the building is clearly of a higher quality of architecture than the extant scheme; and there is no reason that contemporary architecture should not be used within a rural environment.

9.4 Furthermore whilst the proposal clearly includes larger areas of glazing on its southwest and northeast elevations, given the location and reduced level of the building on the Site; the extent of surrounding trees; the reduced number of roof lights (and use of automated blinds); the design elements proposed in the architecture; the lack of external lighting (with the potential for control of this by condition); and the proposed planning condition to secure low transmittance glass, upward light emissions with their potential for consequential effects on dark skies would be limited. Whilst lighting would be seen from slightly different places in the landscape (with more lighting seen from the south but less from the east and north), the overall effect of the current proposal on landscape character would (in my judgement) be no worse or better than with the extant scheme.

9.5 I therefore find no conflict with the objectives of NPPF, or with the objectives of Core Policies 51 or 57 of the Wiltshire Core Strategy; and given these findings, I invite the Inspector to allow the Appeal.

10 EXPERT'S DECLARATION

10.1 I confirm that my duty to the Planning Hearing as an expert witness overrides any duty to those instructing or paying me, that I have understood this duty and complied with it in giving my evidence impartially and objectively, and that I will continue to comply with that duty.

10.2 I confirm that my Statement includes all facts which I regard as being relevant to the opinions which I have expressed and that attention has been drawn to any matter which would affect the validity of those opinions.

10.3 My Statement includes or reflects all relevant facts of which I am aware. Where I have made specific or important assumptions these are set out or included as an appendix. If there are material matters of which I am unaware or if the assumptions are incorrect or inappropriate for any reason of which I am currently unaware it could have a material effect upon my stated opinion.

10.4 I confirm that I am not instructed under any conditional fee arrangement nor have I entered into any agreement by way of funding this Appeal either directly or indirectly.

Conflicts of interest:

10.5 I am not aware of any conflicts of interest of any kind other than those already disclosed in my report.

10.6 I do not consider that any of the matters set out affect my suitability to act as an expert in this matter.

10.7 I undertake to advise those instructing me if, between the date of this Statement and the Planning Hearing, there is any change in circumstances which will impact on this declaration.

11 STATEMENT OF TRUTH

11.1 I confirm that I have made clear which facts and matters in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

Date: 19th July 2024

Mark Gibbins BA (Hons), CMLI

Director

Indigo landscape Architects Limited