

Mr Wayne Campbell
Planning and Development
Cherwell District Council
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15 June 2021
Our Reference: 2123

Dear Mr Campbell

Planning and Listed Building Applications 21/01505/F and 21/01476/LB – Extension of existing boarding house through the reinstatement of part of the existing ruined coach house, the demolition of outbuildings, the erection of an extension and link structure (with associated alterations to Stone Hill House), insertion of internal wall, and associated works, at Stone Hill House, Stone Hill, Bloxham

Hylton Planning Ltd has been instructed by Mr Goulden of Ashwell Cottage, and Mrs Campbell of Ashwell House, Stone Hill, Bloxham to prepare this letter of objection to the above planning and listed building applications.

In preparing this letter, the submitted application documents have been examined and reviewed and, prior to addressing the impact of the proposed development, I would like to bring to your attention the fact that neither of my clients were directly notified by letter about the submission of the applications. I appreciate that neither property shares a boundary with the application site, however, the proposed development would directly face Ashwell Cottage with a separation distance of approximately 12m. Whilst Ashwell House is slightly offset, the proposed development would only be separated from the front elevation of this property by approximately 14m. In contrast, Hill House and The Old Bakery were notified by letter, and although these properties share boundaries with the application site, the dwellings themselves are respectively sited approximately 40m from the proposed development. The exercise in notifying neighbours by letter in this instance, does not sit comfortably with the Council's approach to consulting people in buildings that are likely to be affected by a planning application as set out in the Council's Statement of Community involvement 2016.

I also note Historic England's online guidance which sets out that it must be consulted about development which affects the character or appearance of a Conservation Area, and which involves the erection of a new building or the extension of an existing building where the area of land in respect of which the application is made is more than 1,000 square metres. Historic England has not been consulted on the applications, and whilst the application form states that the site area is 0.1ha, this is on the cusp of the requirement and therefore, my feeling is that, for the avoidance of doubt, Historic England should have been consulted on the application, as they have been on other CDC applications of 0.1ha in conservation areas, that I am aware of.

Turning to the impact of the proposed development, the starting point for the consideration and determination of any planning application such as this is Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), which requires planning applications to be determined in accordance with the statutory Development Plan unless materials considerations indicate otherwise.

Additionally, given the nature of the proposed development, affecting a listed building, the setting of nearby listed buildings and the character and the appearance of a conservation area, the Planning (Listed building and Conservation Area) Act, 1990. S 66 (1) and s 72 sets out that the Secretary of State shall have special regard to the desirability of

preserving the building or its setting or any features of special architectural or historic interest which it possesses, and that special attention shall be paid to the desirability of preserving or enhancing the character or the appearance of any buildings or land in a conservation area.

The Development Plan for the Cherwell District comprises the Cherwell Local Plan 2011-2031, Part 1 (adopted 20 July 2015), the 'saved' Policies from the Cherwell Local Plan 1996, and, due to the fact that the site lies within Bloxham, the Bloxham Neighbourhood Plan 2015-2031 ('made' 19 December 2016). Material considerations relevant to the proposed development include the National Planning Policy Framework (2019), the Bloxham Conservation Area Appraisal (2007), the Cherwell Residential Design Guide (2018), the Home Extensions and Alterations Design Guide (2007) and the Draft Bloxham Conservation Area Appraisal 2020 which carries less weight than the adopted documents.

I would like to point out that my clients recognise the weight that is given to supporting alterations to schools to ensure sufficient choice both through national and local policy and guidance. They also recognise that, in this case, there is merit in removing the modern buildings from the site and sensitively restoring the historic outbuilding together with securing the future maintenance of Stone Hill House as a Grade II listed building, together with its listed boundary walls, curtilage and outbuildings, which contribute significantly to the character of Stone Hill.

However, Mr Goulden and Mrs Campbell have serious reservations, about the scale and the appearance of the development proposed in this very sensitive part of the Bloxham which will harmfully affect both listed buildings and the conservation area. Mr Goulden and Mrs Campbell are also particularly concerned about the impact of the proposed development upon highway safety and residential amenity.

As a number of their objections relate to heritage issues, Mr Goulden and Mrs Campbell have also commissioned Heritage Consultant James Edgar, BA, MSc, MA, Dip Archaeol, MRTPI, IHBC, of Historic Buildings Consultants Ltd (hereafter referred to as HBC), to identify the significance of the heritage assets affected by the proposed development and to assess its impact on the heritage assets in the area and on their settings (contained within the enclosed Heritage Report). HBC's report, which should be read in conjunction with this letter of objection, sets out the law and policy framework, within which the application must be determined, it identifies the heritage assets that would be affected by the proposal and concludes by assessing the level of harm that would be inflicted upon them should the applications be approved.

Having reviewed HBC's Heritage Report, and subsequently the submitted planning and listed building applications against the Development Plan, together with examining my clients' concerns, it is my professional opinion that the proposed development is contrary to the relevant development plan policies for the following summarised reasons:

- By virtue of the extent of demolition and their scale, design, materials and siting the proposed extensions would harm the listed structures at Stone Hill House which is a Grade II listed building.
- By virtue of their scale, design, materials and siting the proposed extensions would cause harm to the setting of nearby listed buildings,
- By virtue of their scale, design, materials and siting, the proposed extensions would cause harm to the significance of the Bloxham Conservation Area and visual amenity,
- By virtue of the loss of the existing off-street parking provision, the proposed development would result in adversely affecting highway safety and convenience, and
- By virtue of their scale, siting and proximity to Ashwell Cottage and location of proposed fenestration, the proposed extensions would cause harm to the amount of light, privacy and outlook currently enjoyed by Mr Goulden.

My professional opinion is based on the following detailed reasons, and where these reasons are based on heritage matters, reference is made to HBC's Heritage Report, which provides a more detailed specialist opinion.

IMPACT ON STONE HILL HOUSE, BOUNDARY WALL AND OUTBUILDINGS

HBC's report identifies Stone Hill House and the attached wall with elliptical keystone arch to rear as being structures of special architectural interest and explains that the designation also includes the boundary wall to Old Park Farm, and all remaining sections of historic wall in the yard.

Demolition

The Demolition Plan indicates the extent of fabric to be demolished, albeit that two elements of demolition are omitted from the plan. HBC's report states that a considerable amount of significant and listed fabric would be demolished which

HBC considers to be harmful as historic fabric is irreplaceable. The HBC report goes into further detail about the elements of demolition (see paragraphs 3.8 – 3.12), concluding that it would cause harm because listed, historic fabric would be removed or altered in ways that would diminish significance. It is also noted that much of the historic fabric to be removed is walling within the site, the removal of which is contrary to guidance contained within the Bloxham Conservation Area Appraisal (2007) which promotes the retention of boundary walls and gateways.

Separation

The relationship between Stone Hill House and its associated outbuildings is considered at paragraphs 2.7 – 2.10 of the HBC report, which notes the indication of the arrangement of the buildings on the 1801 enclosure map, but identifies the importance of the plan form of the site at the time of the first edition of the Ordnance Survey Map 1881. HBC considers the later phase of alteration to be significant as it produced the relationship between the buildings that is experienced today. A key element in that relationship was, and remains, the separation between the house and the outbuildings.

Link Building

HBC describes how the proposed glazed link between Stone Hill House and the restored coach house/stable would remove a section of the important dividing wall between the house and the yard and block up the historic entrance into the yard (paragraph 3.13), resulting in a loss of fabric, confusing the historic plan form of the site and the relationship between the house and the former outbuildings. The essential (pastoral) need for the link is understood, but as it amounts to harmful alterations, clear and convincing justification is required to demonstrate that there are no other options on the School's campus, which would result in less harm, to achieve the brief.

Coach House

While HBC accepts that there is some heritage benefit to the repair and consolidation of the coach house structure (paragraph 3.17), it is not considered that enough analysis has been carried out to inform the proposed design. The application proposes a standing seam zinc roof which HBC states would contrast strongly with the traditional features and structures in the street; they would stand out and present an inharmonious appearance. For these reasons, HBC considers the roofing material to be inappropriate for, and harmful to, the listed building at Stone Hill House contrary to the Council's guidance (paragraph 3.18).

New Build

The new dormitory and common room block would result in the loss of fabric as set out in the HBC report (paragraph 3.24) which also states that it is not just the loss of fabric that would be lost but also the very boundary line [between Stone Hill House and Old Park Farm] . . . the proposed features would do more than 'blur' the property division, they would make it almost unintelligible, therefore eroding the historic legibility between the sites.

Despite the HCUK claim (paragraph 5.24) that the proposed new build would reinstate former buildings in their proposed location, HBC identifies that no evidence has yet been provided to illustrate their form (paragraph 3.25). The 1881 OS plan indicates footprint and HBC suggest that any historic outbuildings are likely to have been no more than single storey in height. In clear contrast, the proposed building would occupy a much larger footprint than depicted on the 1881 OS plan and at two storey height with the inclusion of the second glazed link would be almost as long and wide as Stone Hill House itself. The HBC report continues by describing the plethora of modern building materials and styles that are proposed (paragraph 3.26) and questions how the form, size, features, details and materials accord with the Council's guidance contained within the Bloxham Conservation Area Appraisal (2007).

Overall, the proposed development would harm the listed building by virtue of the extent of demolition of historic fabric (the significance of which has not been fully examined), by eroding the historic legibility between Stone Hill House, its associated outbuildings and Old Park Farm, by introducing a new building which would be significantly greater in scale than what evidence suggests was formerly on the site, and by introducing a plethora of modern building materials and style which would starkly contrast with the traditional and simple elevations of Stone Hill House, for these reasons, the development is contrary to Local Plan Policy ESD 15 which requires development to conserve, sustain and enhance designated heritage assets and ensure that new development is sensitively sited and integrated in accordance with advice in the NPPF and saved Policy C18 which gives special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest, and continues by stating that the Council will normally only approve internal and external alterations or extensions to a listed building which are minor and sympathetic to the architectural and historic character of the building.

IMPACT UPON THE SETTING OF NEARBY LISTED BUILDINGS

In its heritage report, HCUK only recognises one building as a designated heritage asset; Stone Hill House itself, that has the potential to be affected by the proposals (HCUK paragraph 4.2). However, Historic England's records show four other listed properties within the immediate setting of the site which have the potential to be affected. These include Ashwell House (and Ashwell Cottage) immediately opposite the site to the south, Stone Hill Cottage, immediately to the north of the site and attached to Stone Hill House, Hill House to the north of the site and The Old Bakery to the east. Furthermore, Old Park Farm and Culross which face the application site from the west and south respectively, are identified in the draft Bloxham Conservation Area (2020) as Local Heritage Assets, recognised by Cherwell District Council as regionally or locally significant either for their architectural detail or for their part of the social history of Bloxham. HBC's report highlights reference to paragraph 189 of the NPPF which requires any affected assets and their setting to be assessed. As the other buildings referred to above have not been taken into account, the requirements of the NPPF have not been met by the HCUK statement which accompanies the applications.

The Old Bakery is located on the eastern side of the Stone Hill House, and therefore the proposed development, being sited to the west of Stone Hill House, is unlikely to have a detrimental impact upon the setting of this listed building. Hill House is separated by 40m from the proposed development and therefore unlikely to be significantly affected.

The other listed buildings referred to above, however, have a direct relationship with the site, either adjoining it or immediately opposite on the south side of Stone Hill. Given their proximity to the proposed development and their importance as individual listed buildings, particularly Ashwell House as identified in the Bloxham Conservation Area Appraisal (2007), the proposed development has the potential to affect their settings. The presence of the proposed development, due to its large scale, siting adjacent to the road frontage and proposed discordant materials and finishes as referred to above and described fully in HBC's report, together with its proximity to the nearby listed buildings would adversely affect the setting of those listed buildings, particularly Ashwell House and adjoining Ashwell Cottage.

Furthermore, HBC's report recognises the importance of Old Park Farmhouse as described in the Victoria County History records (paragraph 2.5) and that the building is recognised as a 'local heritage asset' in the draft revised Conservation Area Appraisal. For these reasons, it is reasonable to identify the building as a non-designated heritage asset, and therefore, in line with ESD 15, its setting should be conserved, sustained and enhanced.

To the contrary, HBC's report explains that the existing historic boundary line between Stone Hill House and Old Park Farm would be lost, and that more than one full storey and a high ridge would face directly onto the garden of Old Park Farm. The elevation to Old Park Farm will be adorned with four full-height glazed doors and one full-height window. Based on the modern choice of materials and finishes together with the unusual relationship that would result from a two storey buildings located along an altered boundary line with pedestrian access opening out over the curtilage of Old Park Farm, it is considered that the setting of Old Park Farm would be adversely affected.

It is also reasonable to identify Culross as a non-designated heritage asset, the setting of which, given its location opposite the application site, should also be conserved, sustained and enhanced. However, for the same reasons, as set out above, the application would have a similar adverse impact upon the setting of Culross as it would have upon Ashwell House and Cottage.

For the above reasons, the proposed development is in direct conflict with Local Plan Policy ESD 15 which seeks to conserve, sustain and enhance the setting of designated and non-designated heritage assets, and saved Local Plan Policy C18 which gives special regard to the desirability of preserving a building or its setting.

IMPACT ON SIGNIFICANCE OF CONSERVATION AREA AND VISUAL AMENITY

Stone Hill lies within the Hill Lanes character zone of the Bloxham Conservation Area as identified within the adopted Bloxham Conservation Area Appraisal 2007. The character zone is identified as consisting of short, winding and narrow lanes which produce some of the most important and scenic views of the village. The visual analysis of Stone Hill identifies a positive view from its junction with High Street up past Stone Hill House together with a strong building line on either side. Stone Hill House, itself is identified as a three storey house with Georgian façade and likely more ancient core, set in a large garden. The Conservation Area Appraisal explains how the topography of the character zone distorts the scale of many buildings, making houses such as Stone Hill House appear monumental.

Whilst the draft (revised) version of the Bloxham Conservation Area Appraisal 2020 identifies Stone Hill House as now lying within the School character zone, this change to the character zone appears to be based on use alone. Paragraph 2.12 of the HBC report explains that the dividing line between the two suggested areas is drawn at the back of the

pavement on the north side of Stone Hill, which is seen as a very strange suggestion given the common history and characteristics shared by both sides on Stone Hill. Indeed, neither Stone Hill House nor Stone Hill are mentioned in the analysis of the School character zone, instead their importance and significance are still referred to within the Hill Lanes character zone analysis, which clearly suggests that the contribution that they make to the significance of the Bloxham Conservation Area as buildings, regardless of their use, remains to be particularly important. The draft version of the Conservation Area Appraisal can be given some weight, but it is not the adopted version, and therefore greater reliance should be placed on the 2007 version.

HBC's report identifies Stone Hill as a 'wonderful street comprising a strong group of important historic buildings, all constructed in traditional forms and with traditional materials there are no discordant features or modern materials' (paragraph 3.4), see photographs 1 and 2.



Photographs 1 and 2: Stone Hill is characterised by a simple palette of traditional building materials (Photograph 2 - Source: Google Streetview).

It is also noted that together with the listed buildings identified earlier in this letter, that the remaining buildings along Stone Hill; Treadwell House, Forge Cottage, Culross and Old Park Farm are identified in the draft Bloxham Conservation Area (2020) as Local Heritage Assets, recognised by Cherwell District Council as regionally or locally significant either for their architectural detail or for their part of the social history of Bloxham.

It is clear therefore that the character of the whole of Stone Hill is of particular significance within the Bloxham Conservation Area, with all buildings on Stone Hill being recognised for their special or local interest and that the simple palette of materials used along Stone Hill contributes to the distinctiveness of the street.

The following paragraphs identify the harm that the proposed development would cause to the character, significance and distinctiveness of the Bloxham Conservation Area and the visual amenities of the area, by virtue of its scale, mass, siting, materials and design.

Scale, Mass and Siting

Both the Heritage Statement and Design Statement explain that the location of the proposed development along the western boundary is based on evidence of previous, ancillary buildings in this location, which would have served the main House. This appears to be a logical conclusion for the siting of new buildings, however aside from the coach house/stable to be restored, neither statement seeks to establish the likely scale of the previous ancillary buildings with the view to informing a suitable approach to the scale/massing now proposed. It seems that the applicant has recognised the need to achieve subservience through the design of the new buildings, however this is only attempted through the use of 'diminutive' materials rather than the scale and massing, particularly for the new build block.

HBC's report notes that 'the proposed new dormitory and common room block would be a large, two storey structure which, if Glazed Link 2 is included, would be almost as long and wide as Stone Hill House and that the ridge of the building would rise above the eaves line of Stone Hill House'. A two-storey building of the proposed span, length and height, located on higher ground, would compete significantly with the scale of Stone Hill House and would not therefore appear as ancillary to the host building in direct conflict with Local Plan Policy ESD 15 which requires all new development to be designed to improve the quality and appearance of an area and respect the form, scale and mass of buildings, Neighbourhood Plan Policy BL11 which requires all development to relate in scale, massing and layout to neighbouring properties, and the Council's support for new buildings which are sympathetic to the intrinsic character of the area in terms of scale, design and materials as set out in the adopted Bloxham Conservation Area Appraisal (2007).

Materials and Design

The predominant building material along the whole of Stone Hill is ironstone with slate or plain tiled roofs. There are some minor ancillary instances of red brick in the form of walling and chimney stacks (see photographs 1 and 2), all of which are traditional materials which is confirmed by paragraph 3.4 of HBC's report. Stone Hill House itself is constructed from dressed ironstone under a tiled roof. The boundary wall is constructed from ironstone, all of which create a strong distinctive appearance.

Whilst the former coach house/stable would be restored using ironstone to its elevations, it is proposed that the new pitched roof, which would run parallel to Stone Hill above the existing boundary wall would be covered in Aluzinc standing seam zinc roof sheeting. The same would be applied to the new two-storey block to the west, together with vertical and horizontal timber boarding and powder coated aluminium windows and doors. Paragraph 5.16 of HCUK's statement suggests that the use of zinc for the roofs will be in keeping with the slate on the main house (the roof is however covered in tiles as confirmed in the list description) but would have a more diminutive character, to maintain subservience (paragraph 5.27) and to retain a sense of primary and secondary spaces and structures, preserving historic hierarchy (paragraph 5.24). The Design Statement claims that the approach is to use traditional materials and form but with contemporary detailing, avoiding a pastiche aesthetic and enhancing the visual legibility between new and historic (paragraph 8.0).

Achieving subservience and preserving historic hierarchy is welcomed, and clearly necessary, in terms of preserving the setting of the listed building, however my clients believe that the proposed development fails in its attempt to achieve this. As set out above, the scale and massing of the new building is not subservient, and the proposed materials would do nothing to achieve the same. Traditionally within the District's historic ironstone villages, subservience has been achieved through reduced scale and the use of red brick, for example, under traditional roofing materials such as slate or tile. Neither Heritage or Design Statement explore the use of materials on subservient or ancillary historic buildings within the vicinity of the site, or how traditional building materials could be successfully and sensitively integrated into the Conservation Area and the setting of nearby listed buildings.

In direct contrast, the standing seam zinc roof sheeting, timber boarding and aluminium windows which would be extremely prominent within the street scene, would appear as highly discordant and urbanising features which pay no attention to the simple palette of materials which is distinctive of Stone Hill. The development's approach to materials and detailing would be in direct conflict with saved Local Plan Policy C28 which requires the choice of external finish materials to be sympathetic to the character of the urban or rural context and that in sensitive areas, such as conservation areas, the use of traditional local building materials will normally be required, Local Plan Policy ESD15 which requires development to reflect or, in a contemporary design response, re-interpret local distinctiveness,

including elements of construction, elevational detailing, windows and doors, building and surfacing materials, mass, scale and colour palette, and Bloxham Neighbourhood Plan Policy BL11 which sets out that the design and materials chosen should preserve or enhance rural heritage, should be in keeping with local distinctiveness and characteristics of the historic form of the village, make a positive contribution to the character of Bloxham and its rural feel, and use materials in keeping with the distinctive character of our local brick or ironstone.

In support of using locally appropriate materials, the Council's Residential Design Guide (2018) sets out that the use of a simple consistent palette of walling materials is one of the most distinctive characteristics of Cherwell's historic towns and villages. It continues by stating that wood cladding and substitutes for natural materials are not acceptable. The proposed development does not comply with this guidance.

Turning to the design of the proposed development, aside from the zinc roofing already discussed, the building would be designed both with pitched and flat roofs, instances of vertical and timber cladding, glazed screens of varying sizes and windows of varying sizes and alignment, including a large projecting window which breaches the eaves of the roof, a window which wraps around the north eastern corner of the proposed building, a smaller window with horizontal emphasis, large rooflights on the western roofslope and glazed screens and doors with vision panels to the street elevation. Whilst the accompanying Design Statement addresses Visual Appearance and Massing at Paragraph 7.0, it does not explore or justify why the proposed visual appearance and treatment of the buildings are suitable within their context. Furthermore, HBC states that the design chosen for the gates is inappropriate for the listed building and conservation area; historic gates and doors do not have tall 'vision panels' (paragraph 3.14).

As proposed, the elevations appear as a complex mix of materials and treatments; the fenestration in particular introducing a wide range of styles, both on the building and within the historic wall facing Stone Hill, which does not reflect the distinctive simplicity and rhythm of Stone Hill House or the notation contained within paragraph 8.9 of the Draft Conservation Area Appraisal which states that houses [within the conservation area] are of substantial build and have simple detailing, based on medieval traditional and architecture. HBC states that the [proposed development] would be fully visible from the street and it would become an assertive modern intervention drawing attention to itself in the elevated topography of Old Park Farm and Stone Hill House (paragraph 3.28). It could not therefore be concluded that the development would be sympathetic to its rural context, contrary to saved Local Plan Policy C28. Furthermore, the design of the development would not contribute positively to the area's character or identity by creating or reinforcing local distinctiveness, nor would it integrate with the existing street in conflict with Local plan Policy ESD15. Stone Hill Views

The Bloxham Conservation Area Appraisal states that the characteristics of the Hill Lanes Character Zone produce some of the most important and scenic views of the village and identifies a positive view from the east end of Stone Hill looking west (photographs 1 and 2), which takes in the front elevation of Stone Hill House, and which is characterised by ironstone buildings of simple appearance. A further valuable view from Stone Hill is the view looking east from the identified 'pinch point' between Ashwell House and Old Park Farm, which takes in the rear elevation of Stone Hill House (photograph 3).



Photograph 3: View of the rear elevation of Stone Hill House, looking east along Stone Hill.

HBC's report recognises that the group [of buildings surrounding the site] including Old Park Farm, makes an important contribution to the character and appearance of the Conservation Area (paragraph 3.21). Furthermore, HCUK states that the characteristics of the setting of Stone Hill 'enable and allow visual means to experience it as part of an important group of period properties within the heart of Bloxham' (HCUK, p 21, para 4.13), which HBC describes more succinctly as; the present-day setting contributes to the heritage significance of the site and to the character and appearance of this part of the conservation area.

The proposed development, due to its siting and scale, as previously described, would harmfully mask the rear of Stone Hill House, therefore interrupting the recognised views and the contribution that the group of buildings makes to the conservation area in conflict with Neighbourhood Plan Policy BL12 which requires development to ensure that key views can continue to be enjoyed and an acceptable impact in relation to the visual qualities of those views, or Local Plan Policy ESD15 which requires development to be designed to integrate with existing street and public spaces. Whilst HCUK explains that the proposed development is based on reflecting the previous enclosure of the site that the former outbuildings might have once provided, HBC continues by stating that it is important to give due weight to present-day characteristics of setting and appearance (paragraphs 2.7 – 2.10), therefore it is questionable as to whether the reinstatement of the sense of enclosure as suggested by HCUK is of major benefit and therefore this does not outweigh the recognised conflict with the development plan policies.

Overall, based on the scale, massing, siting, design and materials, my clients are of the very strong opinion that the proposed development would not be sensitively sited or integrated into Stone Hill, for these reasons, it would not respect local character, would harm the enjoyment of views, cause harm to visual amenity, damage the heritage interest of this part of the village including the existing archway, and would not therefore conserve, sustain or enhance the character and significance of the Bloxham Conservation Area, contrary to Local Plan Policy ESD15, saved local Plan policy and Neighbourhood Plan Policies BL10, BL11 and BL12, and would therefore result in harm. The level of this harm and the extent to which it is justified and/or outweighed by public benefit is discussed below.

HARM VERSES PUBLIC BENEFITS

The NPPF at paragraph 194 requires any harm, or loss of, the significance of a designated heritage asset to be clearly and convincingly justified. Paragraph 196 requires any level of less than substantial harm [to the significance of a designated heritage asset] to be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.

The NPPF gives great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications (paragraph 94). It also gives great weight to conserving a heritage asset when considering the impact of a proposed development upon its significance (paragraph 193).

HBC's report concludes that the proposed development would, if approved in its current form, lead to less than substantial harm to the identified designated heritage assets, namely, Stone Hill House and its curtilage boundary walls and features, the setting of Ashwell House and Cottage as a listed building, the setting of Old Park Farm as a non-designated heritage assets and the Bloxham Conservation Area. In spite of HCUK's conclusions that the level of harm would be at its lowest end (paragraph 6.4), it is HBC's professional opinion that the harm that would be caused would be serious and therefore must be set at a high level (paragraph 3.32).

As the proposed development causes harm, to the significance of heritage assets, this harm must be clearly and convincingly justified. The justification submitted with the application is not convincing as the Heritage Opportunities and Constraints Overview prepared by HCUK within the School's Master Plan (September 2020) identifies Stone Hill House as a constraint stating that 'Stonehill, Stonehill cottage and curtilage are an important group, prominent within the town. Quality garden spaces and associated walls limit development opportunities'. In contrast opportunities are identified across the School's campus, which are not expanded upon with the application documents as to why these sites have been dismissed in favour of the harm that would be caused at Stone Hill House. Arguments put forward in the planning statement prepared by Edgars Ltd in support of the proposed development are that the extension of existing boarding houses is the most sustainable and logical solution to the increased demand, rather than building a brand new boarding house that would be beyond the scale required and the cost that would be appropriate and that Stone Hill House is the smallest of all the boarding houses and would therefore benefit most from extending (paragraph 4.5).

The application documents do not clearly and convincingly expand upon these arguments in order to justify the harm that would be caused by the development. There is no clear evidence that a purpose built boarding house cannot be built elsewhere or other school building reconfigured to avoid the harm that would be caused. The fact that Stone Hill

House is the smallest boarding house does not justify its extension or the harm, identified by HBC, that the proposed development would cause. Furthermore, if Stone Hill House became surplus to the School's requirement, it is not considered that this would put the building at risk given the clear value of the property, the strength of the housing market and the extent to which Bloxham is a sought after village in which to live. Furthermore, the building's use as a residential property is considered to be its most optimum (and historic) viable use, which would result in less development pressure.

Turning to public benefit, the alteration and expansion to the School to provide increased and improved boarding space, improving the School's offer and the subsequent impact that this would have upon the economic outlook for the School is positive, and in accordance with the NPPF should be afforded great weight with regard to decision making. The principle of the development to expand the School's existing estate, therefore can be considered as a clear public benefit of the proposal.

It is also recognised that the proposed development would generate increased staffing opportunities which is a public benefit, however relatively modest in this instance, given that is unlikely that a significant number of additional staff would be required in relation to the increase in the number boarders (25). There may also be some recognition of public benefit in providing employment opportunities during the build process if the applications were approved, however this would amount to modest and temporary benefits. These identified public benefits must be weighed against the high level of less than substantial harm that the HBC report identifies.

The planning statement suggests that a number of heritage benefits can be brought forward in the proposal (Edgars Ltd paragraph 6.8), including reflecting the historic layout with the new buildings, restoration of the former coach house and the archway, removing the non-historic outbuildings and maintaining a future viable use of the site.

HBC's report only recognises the potential heritage benefit to the repair and consolidation of the coach house, together with the removal of the non-historic buildings within the courtyard, however these benefits are limited in their current form, particularly given the proposed treatment of the coach house which does not appear to be based on a clear understanding of its previous form, therefore amounting to modest public benefit. As discussed above, the proposed buildings are not based on any evidence of the former footprint and scale of the former outbuildings, therefore it cannot be concluded that these are being reinstated and in their current form would cause clear harm to the identified heritage assets, amounting to no public benefit. Furthermore, as set out above, it is not considered that the future use of the site is at risk if it became surplus to the School's requirements, therefore the weight given to securing the buildings future via the proposed application can only reasonably amount to modest public benefit.

Overall, it is HBC's professional opinion that the proposal to develop Stone Hill House will lead to a high level of less than substantial harm to the identified designated heritage assets; harm which has not been clearly and convincingly justified. Furthermore, while the public benefits arising from the development of the school are recognised, the proposed development would otherwise lead to a high level of harm by way of unacceptable impact upon the character and historic interest of Stone Hill House and the significance of its setting, unacceptable impact upon the setting of nearby listed buildings and unacceptable impact upon the significance of the Bloxham Conservation Area for the reasons set out in the HBC report and this letter. This high level of less than substantial harm is not outweighed by the identified public benefits, and therefore does not meet the requirement of the NPPF of Local Plan Policy ESD 15.

IMPACT ON HIGHWAY SAFETY

As described in the Bloxham Conservation Area Appraisal, Stone Hill is a narrow lane, and whilst at its east end, the lane is wide enough to accommodate on street parking adjacent to the northern footpath, which reduces the remainder of the lane to a single carriageway, the lane reduces to just 4.05m where it runs adjacent to Stone Hill House and its associated boundary wall. The narrowness of the carriageway at this point, together with a particularly narrow footway on the northern side only, and the strong building line on both sides of the carriageway means that there is not enough space for vehicles to park alongside Stone Hill House and its boundary wall without obstructing either the road or the footway. Such occurrences relating to the use of Stone Hill House result in a dangerous highway safety concern, particularly for pedestrians, and an inconvenience for other vehicles using the lane including those associated with, in particular, Ashwell Cottage, whose vehicular access is immediately opposite the site. In addition to this, there is the ongoing risk of obstructing emergency vehicles.

The Planning Statement prepared by Edgars Ltd which accompanies the submitted applications clearly states at paragraph 6.25 that it is the school's internal policy that parking should not occur at Stone Hill House directly and that as the property acts as a satellite site, within walkable distance to the main school campus, pupils, parents and staff currently use the existing main car park for parking and for dropping off and picking up pupils.

If this policy were strictly adhered to there would be little or no impact upon Stone Hill in terms of highway safety and convenience, however, my clients report that this is not the case and that the site is currently used every term day for parking by staff members as is demonstrated by the photographs below (photographs 4 and 5) which were taken on 09.06.21. This does not comply with the School's parking policy and, if approved, the proposed development, would result in the blocking up of both existing vehicular accesses to the site and therefore the loss of the existing parking arrangement for staff. My clients must therefore be reassured that the development will not result in displacing parked staff vehicles onto the carriageway.



Photographs 4 and 5: Staff vehicles parked within the grounds of Stone Hill House

My clients also report that parents drop off and pick up their children outside Stone Hill House on a regular basis, which, at the beginning and end of term increases significantly, resulting in numerous vehicles parked within the highway for extended periods of time due to the loading and unloading of belongings at each end of each term. This exacerbates the highway safety and convenience concerns, particularly for Ashwell Cottage, as referred to in the preceding paragraphs of this letter.

There is added concern, that, although beyond the application site boundary, the proposed two storey dormitory building and its intended access arrangements from the first floor into the curtilage of Old Park Farm, which is also a school property, would mean that staff and parents would be encouraged to park at Old Park Farm, therefore resulting in highway safety and convenience concerns associated with the increased use the the Old Park Farm access which is of poor alignment with this very narrow section of the highway and has reduced visibility at its junction with Stone Hill, particularly to the west given the siting of Old Park Farm immediately adjacent to the narrow highway.

In addition to severe highway safety concerns, an increased number of vehicular movements and vehicles parking on, and obstructing, the highway, the proposed development involves inserting double doors in the existing archway, which would open out across the narrow footway. This arrangement would not only significantly impact upon intervisibility between pedestrians and drivers but would also obstruct the footway for pedestrians, therefore resulting in a detriment to the safety of the highway.

In clear support of these concerns, the Bloxham Neighbourhood Plan reports that residents have repeatedly highlighted safety concerns about walking Bloxham's narrow streets and medieval pavements to reach local services and facilities. Their frustrations are amplified by parking on pavements, the ever-increasing traffic on the A361, and particularly by HGVs, which often overhang the narrow pavements.

In the absence of the school's parking policy being strictly adhered to, the proposed development, which would see an increase in approximately 25 pupils and the associated increase in staff and parent vehicular movements, together with the arrangement of the new archway doors, would, for the above outlined reasons, be contrary to Local Plan Policy ESD 15 which requires all new development to be designed to deliver safe places to live and work in, Local Plan Policy SLE 4, which does not support development which is not suitable for the roads that serve the development, and Neighbourhood Plan Policy BL 9 which requires all development to ensure that the impact of any additional traffic likely to be generated by the development has been satisfactorily mitigated and will not adversely affect the highway network. For these reasons, my client objects to the development as proposed. In the event that the Council sees fit to approve

the applications, my client urges the Council to impose a planning condition which firmly restricts vehicular movements associated with the site.

IMPACT ON RESIDENTIAL AMENITY

Edgar Ltd's Planning Statement refers to residential properties on the south side of the road, but does not identify them. It concludes by stating that the proposal does not harm the living conditions of residents, however none of the application documents demonstrate the proximity of my clients' properties to the proposed development nor do they discuss the relationship that would result between the two.

As previously set out, the restoration of the former coach house/stable includes a pitched roof, the eaves of which would begin at the height of the existing boundary wall which ranges from 3m to 3.5m in height from the existing level of the footway, to a ridge height of approximately 7m. A glazed screen and glazed double doors are also proposed in the place of the existing timber gates which would serve the matrons room, also to be used as the internal access from Stone Hill House to the proposed common room and additional dormitory space. This new element of the proposed development would be located within approximately 12m of Mr Goulden's sitting room window, which directly faces the location of the proposed building to be restored (see photograph 6).



Photograph 6: Outlook from Mr Goulden's sitting room window.

Privacy

Although it is understood that the front elevation of Ashwell Cottage can be viewed from passers by on Stone Hill, this elevation is not currently directly overlooked by any existing neighbouring windows. The proposed development would introduce a large glazed opening which would serve an active space within the restored coach house within 12m of Mr Goulden's three light sitting room window, and it is his opinion that its location, and the use that it would serve, would result in unacceptably reducing the amount of privacy currently enjoyed in the sitting room of Ashwell Cottage, contrary to Neighbourhood Plan Policy BL9 which seeks to ensure that the living conditions of neighbouring residents are not materially harmed and Local Plan Policy ESD15 which requires new development to consider matters of residential amenity including privacy.

Overshadowing and Outlook

The Cherwell Home Extensions and Alterations Design Guide states that a windowless elevation should normally be at least 14m from a window of a neighbour's habitable room to prevent over shadowing. As set out above, the restored building including its new roof would be sited within 12m of the front elevation of Ashwell Cottage and as such would not comply with the Council's separation standards with regard to outlook. For this reason, it is Mr Goulden's opinion that the proposed development would result in overshadowing his sitting room, particularly given the fact that the window affected is north facing and that the outlook from his sitting room would be unacceptably diminished, contrary to Neighbourhood Plan Policy BL9 which seeks to ensure that the living condition of neighbouring residents are not materially harmed and Local Plan Policy ESD15 which requires new development to consider matters of residential amenity including privacy.

SUMMARY

The new extensions proposed, due to their scale, mass and siting given the surrounding topography, would not appear as subservient or ancillary buildings to Stone Hill House therefore distorting the distinction between primary and secondary functions and consequently causing harm to the status of Stone Hill House as a Grade II listed building.

The proposed alterations and extensions would result in the loss of a significant amount of historic fabric which has not been fully justified therefore causing harm to the historic interest and fabric of the listed building.

The development due to its design and proposed materials would appear as a prominent and discordant feature within all public views of the site, which would be strikingly at odds with the distinctive character of Stone Hill, therefore resulting in undue harm within the setting of the nearby listed buildings and neither preserving nor enhancing the significance of the Bloxham Conservation Area. The harm caused by the proposed development, amounting to a high level of less than substantial harm, has not been sufficiently justified and would not be outweighed by any identified public benefit resulting from the proposed development.

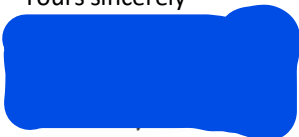
In the absence of adherence to the School's parking policy, the proposed development would cause harm to highway safety and would result in inconvenience by way of obstruction to other road users. Additionally, the already difficult vehicular access to Ashwell Cottage will be further compromised.

The proposed extensions by virtue of their scale, siting, and proximity to Ashwell Cottage and the location of the new glazed screen and doors would result in significantly reduced privacy, unacceptably affect outlook enjoyed and overshadow the principle habitable room within this dwelling.

For all of the reasons set out above, the proposed development is wholly unacceptable, it does not meet the statutory tests to preserve or enhance as set out in the Planning (Listed Buildings and Conservation Areas) Act, 1990. S 66 (1) and s 72 and does not accord with the Development Plan. Furthermore, there are no material considerations to suggest that the application should be determined other than in accordance with the Development Plan. The application should therefore be refused by the Council pursuant to section 38(6) of the Planning Compulsory Purchase Act, 2004 (as amended). The proposed development conflicts with Local Plan Policies ESD15 and SLE4 of the Cherwell Local Plan 2011-2031 Part 1, 'saved' Policies C18 and C28 of the Cherwell Local Plan 1996 and Policies BL9, BL10, BL11 and BL12 of the Bloxham Neighbourhood Plan 2015-2031 and is therefore considered to represent unsustainable development.

I therefore request that you take these strong objections into account before determining the application, and furthermore, conclude that the application should be refused for the reasons set out.

Yours sincerely



Jane Papenfus



Encs: Heritage Report prepared by James Edgar, BA, MSc, MA, Dip Archaeol, MRTPI, IHBC, of Historic Buildings Consultants Ltd.

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