

Mr Wayne Campbell
Planning and Development
Cherwell District Council
Bodicote House
Bodicote
Banbury
OX15 4AA

14 September 2021
Our Reference: 2145

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

Further to my letter dated 15 June 2021, Hylton Planning Ltd has been instructed by Mr Goulden of Ashwell Cottage, and Mrs Campbell of Ashwell House, Stone Hill, Bloxham to prepare this further letter of objection in connection with the revised drawings and documents, received by Cherwell District Council on 26 August 2021, associated with the above planning and listed building applications.

My previous letter brought to your attention that, despite being situated directly opposite the application site, neither of my clients were directly notified by letter about the submission of the applications, and whilst the Council's online register for application 21/01505/F states that Mrs Campbell was notified about the amended plans on 31 August 2021, Mr Goulden of Ashwell Cottage has still not been consulted. Mr Goulden is particularly anxious about the impact that the proposed development would have upon the amenity of his property and is very concerned that he is not being kept fully informed about the proposals, which as previously stated, does not accord with the Council's Statement of Community Involvement 2016.

Prior to examining the merits of the revised plans, Mr Goulden would like to express his concern that neither the Heritage Statement, or the Heritage Addendum prepared by HCUK identify Ashwell Cottage as a listed building, or the impact of the proposed development upon its setting. Ashwell Cottage is an extension adjoined to the Grade II listed Ashwell House. Cherwell District Council identifies Ashwell Cottage as a listed building by virtue of registering listed buildings applications in association with it, including application 95/00203/LB for internal and external alterations, and most recently application 20/01154/LB for replacement windows. Ashwell Cottage is also identified in the Council's Draft Conservation Area Appraisal (2020) as a Grade II listed building (p78). It is Mr Goulden's strong opinion therefore that the Heritage Statement and Addendum should afford Ashwell Cottage the same importance and consideration that the Council does.

Turning to the impact of the revised scheme, this letter should be read in conjunction with my letter dated 15 June 2021 and James Edgar's Heritage Report dated June 2021, both of which still stand, unless otherwise stated in this letter. Again, the starting point for the consideration and determination of the applications is Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), and the Planning (Listed building and Conservation Area) Act, 1990. s 66 (1) and s 72. The Development Plan remains the same together with other relevant material considerations.

Mr Goulden and Mrs Campbell recognise that revised drawings have been submitted, however they strongly feel that the revisions do not address their original objections. They remain to have serious reservations about the scale and the

appearance of the development as a whole and the impact that it would have upon this very sensitive part of Bloxham which will harmfully affect both listed buildings and non-designated heritage assets, and the Bloxham Conservation Area. Mr Goulden and Mrs Campbell also remain concerned about the impact that the proposed development would have upon highway safety and residential amenity, neither of which have been addressed by the revised scheme.

Having reviewed the revised scheme against the Development Plan, together with examining my clients' continued concerns in discussion with James Edgar of Historic Buildings Consultants Ltd, it is my professional opinion that the proposed development is contrary to the relevant Development Plan policies for the same bulleted reasons which are set out in my previous letter, and which are expanded upon in more detail below.

IMPACT ON STONE HILL HOUSE, BOUNDARY WALL AND OUTBUILDINGS

Demolition

It should be noted that the demolition plan ref: 20-050-27 209 has not been updated to reflect the revised drawings and is therefore incorrect. Whilst it is noted that the extent of demolition has been reduced, the revised proposal will still result in the irreplaceable loss of listed, historic fabric which would diminish significance rather than preserve and enhance it, as required by the Act and the relevant Development Plan Policies. The demolition still relates to the loss of boundary walls which is contrary to guidance contained within the Bloxham Conservation Area Appraisal (2007) which promotes the retention of boundary walls and gateways, and contrary to the Management Plan within the draft Bloxham Conservation Area Appraisal (2020) which sets out that the traditional stone boundary walls surrounding properties make a valuable contribution to the character of the settlement, and the demolition of these features will be resisted.

Link Building

Whilst the revised drawings show that the new link building has been reduced in footprint, the physical link continues to represent a harmful alteration to the historic detached relationship between Stone Hill House and its associated outbuildings. It is James Edgar's professional opinion that the entrance is an important feature of the site as it defines the difference between the house and yard. This is a fundamental characteristic of the character and setting of Stone Hill House. This part of the proposal would harmfully remove the historic legibility of the main house and its associated ancillary areas. It is James Edgar's further opinion that good conservation practice would be to retain the separation between the individual elements of the historic environment. Given the clear harm that would still be caused by the revised scheme, 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

The revised drawings indicate that instead of a standing seam zinc roof covering, slate would be used for the roof covering of the reinstated coach house. This does not however reflect the photograph that HCUK included within the Heritage Addendum (a sharper version of which is attached below at Figure 1), which clearly shows the former building with a thatched hipped roof. If the building is to be reinstated, it is my clients' strong view that this should be carried out in accordance with the clear evidence of its former design and materials.



Figure 1: Evidence of the former outbuildings (1934)
(Historic England Archive ref: EPWO44971)

New Build

The revised drawings show that the common room and dormitory block would continue to result in a loss of the historic boundary wall between Stone Hill House and Old Park Farm. It is James Edgar's professional opinion that this part of the revised proposal would have the same harmful impact as referred to above on the historic legibility between Stone Hill House and its ancillary areas and Old Park Farm. Again, good conservation practice would be to retain the separation between the individual elements of the historic environment. Furthermore, the large footprint and scale of the new building would continue to compete unacceptably with the scale of the host house. The impact of this part of the proposal remains the same as set out in my previous letter, which is contrary to the relevant Development Plan policies and guidance contained within both the Bloxham Conservation Area Appraisal 2007 and, in particular the Management Plan contained within the draft Bloxham Conservation Area Appraisal (2020).

Overall, the proposed development would remain to be 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 AND OTHER HERITAGE ASSETS

Whilst the amendments to the scheme are noted, the presence of the proposed common room and dormitory block, in particular, due to its large scale, siting and proposed discordant design, materials and finishes as referred to in detail in my previous letter, and again below, will not resolve the particularly harmful impact that the development would have upon the setting of nearby listed buildings, including Ashwell House and Ashwell Cottage. Despite HCUK identifying that the front elevation of Ashwell House faces south (away from the application site), it is James Edgar's professional opinion that this is inconsequential. For the previously stated reasons, and those contained within this further letter of objection, the setting of the entrance elevations of Ashwell House and Ashwell Cottage, and the building (which incorporates both dwellings) as a whole, would be harmed.

The revised scheme would also be harmful to all non-designated assets within the vicinity of the site. To clarify, James Edgar further states that Old Park Farm, in particular, is a C17 building that makes a major contribution to Stone Hill and the Bloxham Conservation Area. It enjoys uninterrupted views of Stone Hill House and vice versa. This is an important aspect of the setting of all the heritage assets as they are experienced today. This setting and its relationship with the surrounding heritages assets would be harmed by the proposed new structure which would not accord with the Council exercising a presumption in favour of new alterations and extensions that are sympathetic to the existing buildings in scale, materials and design as set out in the Bloxham Conservation Area Appraisal 2007, or that 'any proposed extensions or infill must respect the scale, design, proportions and materials of the immediately surrounding architecture to strengthen the cohesions of the street scene' as required by the Management Plan in the draft Bloxham Conservation Area Appraisal (2020). For these reasons, the revised scheme remains contrary to 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

The character of the whole of Stone Hill is identified within my previous letter as being of particular significance within the Bloxham Conservation Area, with all buildings on Stone Hill being recognised for their special or local interest and that, furthermore, the simple palette of materials used along Stone Hill contributes to the distinctiveness of the street. The revised scheme will continue to cause harm to the significance of the Bloxham Conservation Area and visual amenity for the following reasons:

Scale, Mass, and Siting

Although the amended drawings indicate that the ridge of the common room and dormitory block would be reduced, the fact remains that its footprint would still be as long and as wide as Stone Hill House, as identified in James Edgar's report, therefore still competing with its scale and representing harmful overdevelopment of the site 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), and the Management Plan contained within the draft Bloxham Conservation Area Appraisal (2020).

Materials and Design

The revised drawings do nothing to address my clients' strong objections to the materials and design of the proposed development. The complex mix of materials remains, together with a wide range of fenestration styles, including within the historic wall which faces Stone Hill, that would appear highly discordant and which would have a damaging, urbanising affect within this sensitive part of the Bloxham Conservation Area, contrary to Local Plan Policy ESD 15 which requires all new development to be designed to improve the quality and appearance of an area and 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. The revised scheme is also contrary to 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. Nor do the revised drawings recognise 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).

Important View

As identified in my previous letter, a valuable view of Stone Hill and Stone Hill House, is the view looking east from the identified 'pinch point' in the Bloxham Conservation Area Appraisal (2007), between Ashwell House and Old Park Farm, which takes in the rear elevation of Stone Hill House (Figure 2).

The revised drawings demonstrate that the proposed development, due to its siting, scale, design and materials would severely harm views of the rear of Stone Hill House, therefore interrupting the recognised view 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 ESD 15 which requires development to be designed to integrate with existing streets and public spaces.



Figure 2: View of the rear elevation of Stone Hill House, looking east along Stone Hill.

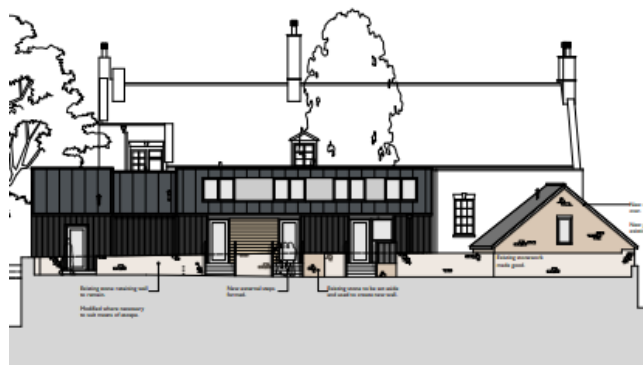


Figure 3: The proposed Common Room and Dormer Block of discordant materials and design which would cause significant harm to the recognised view.

HARM VERSUS PUBLIC BENEFITS

Based on the revised drawings and documents, it is James Edgar's professional opinion that the proposal to develop Stone Hill House will still 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. In further considering the identified high level of harm, James Edgar states that a key conservation issue flows from the school's aspiration to amalgamate three individual heritage assets; the house, the former yard, and Old Park Farm. It is this aspiration that is driving harmful physical change to the character of the conservation area. The degree of connection with the consequent erosion varies but the aim is to integrate the site and maximise the development opportunities. Good conservation practice would be to maintain boundaries (all listed structures and important elements of the conservation area) and the discrete nature of

the individual assets or plots. It matters not whether they are listed, non-designated heritage assets or just an important element in the conservation area. Nor does it matter that the outbuildings were and are ancillary, in some way, to Stone Hill House. It is the maintenance of separateness and distinct identity that is important.

For these reasons, it is James Edgar's opinion that the revised scheme would continue to lead to a high level of less than substantial harm by way of resulting in an unacceptable impact upon the character and historic interest of Stone Hill House and the significance of its setting, an unacceptable impact upon the setting of nearby listed buildings and an unacceptable impact upon the significance of the Bloxham Conservation Area for the reasons set out in the James Edgar's Heritage Report and this letter. This high level of less than substantial harm is not outweighed by the identified public benefits (as referred to in my previous letter), and therefore does not meet the requirement of the NPPF or Local Plan Policy ESD 15.

IMPACT ON HIGHWAY SAFETY

The revised plans and documents make no changes to the parking arrangements for the site, nor do they address my clients' experience of vehicles parked within the site and on Stone Hill by school related vehicles which is not in accordance with the School's parking policy. There is no mention of where the vehicles which currently park within the site and which will be displaced from it, will be accommodated.

Figures 4 and 5, below, are photographs taken on 03 September 2021, believed to be of vehicles which are all on school business, which demonstrate how unsuitable Stone Hill is for the parking of vehicles and which has a significant impact upon highway safety and convenience.



Figures 4 and 5: Any vehicle parked on this narrow section of Stone Hill has a significant impact upon highway safety and convenience.

The serious impact that the proposed development would have upon highway safety, as set out in detail in my previous letter, is not resolved, in direct conflict with 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.

IMPACT ON RESIDENTIAL AMENITY

Whilst a small change has been made to the design of the access door to the Matron's Room from Stone Hill, the revised drawings do not resolve the limited separation that will result between the restored Coach House and Ashwell Cottage. Therefore the impact that the proposed development will have upon impact that the proposed development would have upon Ashwell Cottage in terms of loss of privacy and outlook and by overshadowing, as explained in detail in my previous letter, is not resolved and the development remains to be 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.

SUMMARY

For all of the reasons set out in my previous letter, and 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



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