

Davies, Rebecca S

From: Davies, Rebecca S
Sent: 01 July 2021 00:34
To: Sarah Melton
Subject: New Mill, Inkpen - 21/00164/FUL

Dear Sarah

Thank you for consulting with the AONB on the above application for which the AONB would object.

Firstly the proposed description should be altered to make clear that the proposed boiler and tennis court changes are at New Mill and that the gas tanks and access track are on parcel of land adjacent to New Mill and Bridlepath cottage, the original makes the suggestion that the area covered by the redline of the application is the residential curtilage when this is not the case, it may be within the same ownership but it is a parcel of agricultural land and not an extension of the gardens.

The primary purpose of the AONB designation is to conserve and enhance the natural beauty of the area, as confirmed by Section 82 of the Countryside and Rights of Way Act 2000 (CRoW Act). Section 85 of that Act confirms that there is a duty on all relevant authorities to have regard to this purpose in exercising or performing any functions in relation to, or so as to affect land in AONB's.

The North Wessex Downs is particularly sensitive to developments that are visually prominent, of an urban, suburban or industrial nature or are noisy.

The NPPF is clear that "great weight" should be given to conserving the landscape and scenic beauty of an AONB. A core principle of the NPPF is that the planning system should contribute to conserving and enhancing the natural environment. It has not been demonstrated that the proposed development would conserve or enhance the AONB.

New Mill has had numerous applications and approvals to the extent that the sites character has shifted from a rural country home set in open countryside which is reflective of Inkpen to an urbanised character which unbalances the harmonious character of this part of the AONB, this is a result of cumulative developments on the site. The state of the site and what was an agricultural parcel of land but now akin to a construction depot is very disappointing and disheartening.

Historic maps demonstrate the property which was formerly known as the willows existed on the site in the early 1900s and that there was either a walled garden or structure to the south of the dwelling, the reason for us is that the area between the two was previously a wooded landscape and therefore the market garden would have needed to be located in an area open to light, pressures have resulted in the loss of trees and the boundary hedgerow which separated the market walled garden and the house. The land around the walled garden continued to be used as arable, the loss of the hedge has resulted in blurred lines as such in terms of the residential curtilage, since 2017 the domestic curtilage has been extended as a result of development which has seen continuous creep into open countryside. I would disagree with a statement in the D and A that the applicants aim is to create a home in the country in harmony with nature and its surroundings, the continuous creep of development and continuation of development without the relevant consents demonstrates otherwise, there is a common threat throughout all applications which is a lack on understating of the purpose of the AONB and its nationally designated status and a drive for the applicants to build what they want/desire rather than what is needed. The applicants should change to fit to the property and the environment rather than the landscape being changed to fit them. The applications submitted for the site have not shown any interest in ecology or conservation which does not accord with the statement made in the opening paragraphs of the D&A. It must be noted that this protected landscape is the North Wessex **Downs** AONB and not the North Wessex as referred to in the D&A.

The application site is located within character area type 8E: Highclere lowlands and Heath. This landscape is a mix of clay, gravel and sand and streams are notable in this landscape where the spring line flows out from the chalk

meeting the clay. The area is progressively wooded with woodlands linked by linear belts and hedges that form a matrix across the area. Within this wooded framework there is a considerable diversity with the light sands and gravels creating a heathy character in places (a rare habitat in the NWD AONB). This is illustrated by commons of birch and bracken, heathy rides through woodlands, and areas of poorer acid pasture. There are also important small areas of remnant heath such as Inkpen common where the damp heathland is designated as a SSSI. Inkpen Crocus fields again a SSSI is a nationally important grassland and is very important site for the Red Data Book spring Crocus (*Crocus vernus*), which is an alien species known to have been present at this site since 1800. Inkpen forms a small dispersed linear settlement, despite the complexity and variety of landform and landcover, the landscape has a coherent character, with a consistent framework provided by the strong structure of woodlands, hedgerows and trees (a number of which have been lost over the last 20 years from within and surrounding the site). This creates a small scale enclosed and even secretive character, as a result the landscape has a high sensitivity to localised change. Development pressures are evident with increasing suburbanising elements in the forms of fences, lighting and paddocks. This landscape character type is rich in biodiversity and contains a number of grassland and woodland sites with nature conservation value, in total there are 4 SSSI's (2 of which are in Inkpen) and 75 sites with non-statutory designations.

The agents address the site as an estate, again a term new owners of country houses (which has a small amount of land associated with) seem to be increasingly associating their property with. This is not an estate, it's a country home in open countryside. An estate comprises the houses, outbuildings, supporting farmland, and woods that surround the gardens and grounds of a very large property, such as a country house or mansion, and that the profits from its produce and rents are sufficient to support the household in the house at its centre. This is not the case for the site, the arable land/paddocks associated with the site is currently best described as a builders compound and the keeping of some animals is verging on a small holding but is insufficient enough to support the upkeep and running of a country house and its staff quarters. An example of a local estate would be the Eddington estate which has considerably more land which is used for arable production, grazing of livestock and field sports activities such as shooting are run to provide additional income.

The existing application (part retrospective) involves engineering works for the undergrounding of 6 gas tanks and retention (permanence) of a temporary access to Bridlepath Cottage, the tanks have been located some distance from the property which are to provide gas for the heating of the pool boiler and the dwelling. It is unclear why they are sited so far away, a minimum of 15metre is required between a gas tank installation of this size and a building, therefore the gas tanks could have been located closer to the dwelling and pool to avoid unnecessary engineering works and further disruption to the landscape. The agents have provided no evidence as to why the tanks have to be located in the far corner of the paddock nor provided any justification. I'm astounded that the D&A suggests the tanks will have to be refilled 3x a year if the house is at full capacity. From experience a single 4600L tank providing central heating, water and hob for a 5 bedroom property with 3 bathrooms (was not well insulated) would on average use 3500L of gas and so only required an annual refill. The majority of houses in Inkpen due to there being no mains gas run on cylinders rather than tanks which is easier to accommodate and maintain, I'd be interested to know where and what the original gas source was, if it was a tank then refills would have been managed via the established access off Knitbury Road, originally the house would have also be served by a septic tank as mains sewage didn't come to Inkpen until just over 20 years ago and again the existing well established access would have been the route for maintenance/collection vehicles which are a similar size to the domestic fuel trucks. Furthermore the applicants/agents have stated that other alternative locations were considered yet they have provided no evidence of this or the reasoning for rejecting them.

The gravelled track is proposed for use for maintenance of the gas tanks (filling) and for use by a vehicle to ferry guests to and from Bridlepath Cottage, considering the site as it was and as it should be returned too, an agricultural field and paddocks (it is not part of the residential curtilage) the introduction of a hard surface and a pale coloured one would completely alter the character of the site to that of a domestic one, which would irreversibly harm the landscape and scenic beauty of the AONB due to the suburbanising affect which would be contrary to the AONBs Management Plan, West Berkshires Area Delivery Plan Policy 5, Core policy CS14 and CS19 and para 7, 170 and 172 of the NPPF. There is an established access from the house to the road and access off the road to Bridlepath cottage, again there is no evidence or justification for the works proposed.

The agent states that the existing access off the corner of Pebble Hill/Knitbury Rd is insufficient to accommodate the vehicles, the track is more that efficient to accommodate a gas refilling vehicle (these are not large lorries) and

require a minimum access of 2.75 metres, there appears to be appropriate height beneath the tree canopies, the only area that may be a squeeze is the gateway which is approximately 3 metres, however a shift of one of the bricked piers is significantly less work and harm than that of a new track. The existing access is a long serving entrance and would have been used by fuel vehicles and removal vehicles in the past.

The agent suggests that because the track is not readily visible it will not have an affect of the AONB landscape. There will be glimpsed views of the track and vehicles from both the Bridleway and Rooksnest Lane, this would become more apparent during the winter months when the wooded landscape dramatically opens as the leave cover is lost. However change doesn't have to be visible to be harmful, they are more noticeable but not necessarily more harmful. The site forms part of a complex of post medieval enclosure and 19th century enclosure field patterns which were in agricultural use and more recently paddocks, a character which is strongly rural and prior to temporary construction access/storage) was detached from the nearby properties, the proposed access track (part retention) would result in a material change to the character of the field and would have a suburbanising effect due to the domestic extension between New Mill and Bridlepath cottage, which would fail to either conserve or enhance the natural landscape and scenic beauty of the AONB. Furthermore the works involved in the creation of the track and the metal sheeting, a farm track would not have timber edging,.

I note yet another folly building is being proposed for the site, yet this has been simplified and positioned within the walled garden, the description is inaccurate and should be described as a boiler house or plant room. A folly is *a costly ornamental building with no practical purpose*, especially a tower or mock-Gothic ruin built in a large garden or park. The proposed building does not match the definition, it is proposed to store the boilers required for the heating of the pool, although it is still unclear why these cannot be situated within the pool complex. The building proposed still requires some alterations to ensure it fits within the simplicity of the walled garden, therefore we would encourage the applicants to remove the chimney (as per the boiler specs it can be accommodated within a sealed room) and reduce the height to ensure it sits within the walls and not above, a lean to design would be more appropriate as garden buildings (potting sheds and greenhouses)in walled gardens are traditionally built against the wall.

The last paragraph in the D&A statement demonstrates the lack of understanding of this protected landscape in that it states; *as the majority of works are taking place underground there will be no impact to the natural environment*. The varied landscapes which make up this protected landscape were created as a result of the underlying geology, therefore any underground works has the potential to cause significant harm to the AONB. I note that no biodiversity net gain is proposed at all which is disappointing given the applicants interest in ecology.

Overall, the encroachment of a hard surfaced track and associated use would suburbanise the site and creep into open countryside, which fails to conserve and enhance the landscape and scenic beauty of the AONB. There are no overriding benefits to the proposed retention and development involved on this site.

Kind regards

Rebecca Davies

Principal Landscape and Planning Officer

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