



# **DOWN AMPNEY NEIGHBOURHOOD PLAN**

## **REGULATION 14 CONSULTATION REPRESENTATIONS**

**ON BEHALF OF THE CO-OPERATIVE GROUP**

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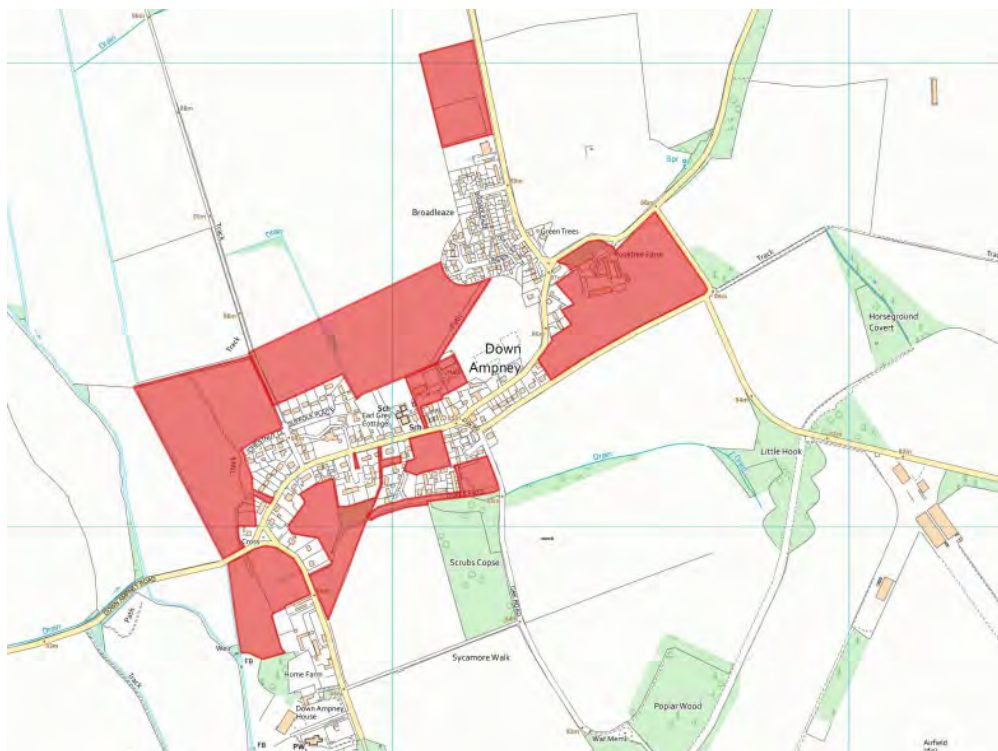
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## 1. INTRODUCTION

- 1.1 Pegasus Group is instructed by the Co-operative Group (Co-op) to submit representations to the Down Ampney Neighbourhood Plan (NP), Regulation 14 Consultation. Whilst the Co-op (referred to in the NP as the Co-operative Wholesale Society (CWS)) sold much of its farming interests in 2015, it has retained control of significant amounts of land around and within the village. As some of these may form potential future development sites, the Co-op has a keen interest in the Neighbourhood Plan. The current substantive land interests are highlighted in dark red below.



**FIGURE 1: CO-OP LAND INTERESTS AT DOWN AMPNEY**

- 1.2 The Co-op has secured planning permission for residential development in Down Ampney at Broadway Farm (44no. dwellings – reference 15/01567/OUT), a Site which has now been sold to Sanctuary Homes.
- 1.3 Two of the three sites allocated for residential development in the adopted Local Plan (Rooktree Farm and Duke's Field) are controlled by the Co-op. Cotswold Homes were recently refused planning permission for 10no. dwellings on Dukes Field (21/00949/FUL). A planning application on Rooktree Farm will be coming

forward for residential development in accordance with the Local Plan allocation in due course.

- 1.4 The Co-op also control a number of sites within the Settlement Boundary of the village where the principle of development and redevelopment is acceptable (subject to compliance with other relevant Development Plan policies). An outline planning application is currently being progressed for 8no. dwellings on land south of Charlham Way (21/04185/OUT).
- 1.5 The Co-op also owns several fields which lie outside of the Settlement Boundary for Down Ampney that is identified in the adopted Local Plan.
- 1.6 These representations are structured around the Chapters presented in the Neighbourhood Plan document. Below we provide a summary of the points raised in response to each chapter.

### ***Chapter 3 - Landscape***

- A detailed Landscape Statement has been prepared to assess Vista 2 and has shown that there is no justification for its identification. Policy LP1 should delete reference to this vista accordingly.
- We are also concerned that the other identified Vistas have not been justified. We would recommend a thorough Landscape Visual Assessment/Appraisal (LVA) is prepared to support the identification of other vistas. Otherwise, Policy LP1 and its supporting text are not based on or underpinned by relevant and up-to-date evidence, contrary to the requirements of paragraph 31 of the NPPF. The failure to comply with National Policy in this regard means that the NP fails the basic conditions. In the absence of this evidence, Policy LP1 should be deleted accordingly.
- Similarly, the identification of areas of Local Green Space (LGS) has not been justified. The supporting Landscape Statement provides a detailed analysis of LGS Site 1 and demonstrates that it fails to meet the tests set out in paragraph 102, criterion (b) of the NPPF. Again, the failure to comply with National Policy in this regard means that the NP fails the basic conditions. LGS Site 1 should be deleted accordingly from the NP.



#### ***Chapter 4 – Infrastructure: Roads, Transport and Drainage***

- Whilst we support the aspiration to improve public transport opportunities within the village, the NP needs to acknowledge that this can only be facilitated and sustained by increasing the number of users. This will necessitate increasing the population to achieve a sufficient critical mass to sustain a more frequent bus service.

#### ***Chapter 5 – Infrastructure: Community and Leisure***

- We note that there are a number of important services and facilities within the village used by residents. It is important that these are supported and facilitating further growth at the village can sustain a critical mass to ensure these continue to serve the community (e.g. the Village Shop and Primary School).
- We note that there is an aspiration to deliver additional services (primarily a village pub). However, to do so will require a sufficient critical mass to sustain them over the longer term.

#### ***Chapter 6 – Economy, Employment and Tourism***

- We agree with the supportive approach toward economic and tourist development within the village as this can potentially assist in delivering additional services and facilities.
- However, we feel that the NP could be more ambitious with its strategy to make Down Ampney a destination (e.g. for walkers and cyclists). We would encourage the NP to consider how facilitating an appropriate level of development could deliver on these aspirations.

#### ***Chapter 7 - Housing***

- The NP does not currently allocate any land for housing within it. This is something that we would strongly urge the Neighbourhood Forum to reconsider given that:
  - It is likely that Down Ampney, as a Principal Settlement, will be required to accommodate further housing to support the delivery of the district's wider housing needs;

- As the Council are proposing a partial update to the Local Plan, it is likely that, as a minimum, the village will be a need to deliver somewhere in the region of 10-15 additional dwellings before the end of 2031;
  - The NP's questionnaire demonstrates that there is a reasonable level of support for further housing in the village and this needs to be explored in detail through a local housing needs survey;
  - Small scale development (sub 10 homes or sub 1000 sqm) will not deliver any affordable housing and so schemes of 10 or more dwellings could be considered to meet identified affordable needs;
  - The NP needs to allocate sites to meet an identified local need in order to benefit fully from the protections afforded by Paragraph 14 of the NPPF.
- On this basis, we would suggest that a Local Housing Needs Assessment is prepared and the NP delayed until the Local Plan Partial Update has progressed further. This will provide a clearer idea of the future housing needs that the NP should positively plan for and whether additional allocations in the village are necessary.
- This will also ensure that the NP is soundly prepared on a robust evidence base and avoid the need to review it as soon as the Local Plan Partial Update is adopted.
- It is inappropriate for the NP to identify areas of Green Infrastructure for a number of potential development sites. Instead, this should be done through a review of the constraints and opportunities of specific sites through the Local Plan process or the development management process. We would suggest these designations are deleted from the plan, with an expression of in principle support for high quality Green Infrastructure to be delivered as part of new development .
- We do not believe that Policy H1 it has been properly justified or how it will effectively deliver bungalows that are purportedly needed. Again, this highlights the need for LHNS to be prepared to properly identify the needs of the community and inform the strategy on how

to address them. This policy is, at present, not underpinned by relevant and up-to-date evidence and so conflicts with Paragraph 31 of the NPPF, thus failing the basic conditions.

- 1.7 In addition to the above, we have also provided an overview of land around the village which could be considered for future development in this Neighbourhood Plan, or a subsequent review, following the completion of the Cotswold Local Plan Partial Update or its subsequent Local Plan Review.

## **2. CHAPTER 3 – LANDSCAPE**

- 2.1 This section of the Plan initially provides a summary of the landscape designations and character areas within which the village and surrounding parish sit. Whilst not strictly landscape designations, the NP provides an overview of the geology of the surrounding area and identifies areas of Grade 2, 3a and 3b Agricultural Land. It also summarises the scheduled monuments within the parish alongside other important non-designated assets. Listed buildings within the parish are identified in Section 7 and Appendix 2 of the NP.
- 2.2 Neither the NP, nor the supporting documents on the Parish Council websites, suggest that the Landscape Chapter is supported by any recent technical work, such as a Landscape Visual Appraisal.
- 2.3 Section 3.4 of the NP then provides an overview of the responses to Question 2 of the survey which asked residents to identify the strengths and positive features of the village.
- 2.4 Regarding landscape related qualities, over 80% of respondents identified the rural nature of the parish, local wildlife and habitats and access to the countryside as important strengths and positive features. It is clear that the rural nature of the village and access to nature and the surrounding countryside are important to residents.
- 2.5 The NP then goes on to note that a defining characteristic of Down Ampney is:

*"...a traditional Cotswold settlement located in open countryside, with the majority of households enjoying views across fields and all households having easy access to footpaths."*

### **Identification of Important Vistas and Policy LP1**

- 2.6 After setting out the above background information, the Landscape Chapter identifies vistas of particular significance in Figure 3.6. This figure is provided below for reference. Proposed Policy LP1 states that development which would have an unacceptable impact on these identified vistas will not be supported.



**FIGURE 2: NOTABLE VISTAS (FIGURE 3.6) EXTRACT**

- 2.7 However, there is little justification or technical analysis behind the identification of these vistas. If important vistas are to be identified, this should be done through a robust Landscape Visual Assessment (LVA). However, no such assessment has been undertaken.
- 2.8 In the absence of such an assessment, one would at least expect to see some analysis of a particular view, identifying why it has been identified. For example, a vista may be considered important if it frames a keynote building, includes a landscape feature (e.g. Cotswolds AONB) or contributes to the setting of a

designated historic asset. However, the level of detail in support of these views is severely lacking. A robust justification for the identification of these views is considered to be essential, given that they will pose a significant constraint on potential future development.

- 2.9 **Vista 1** appears to be a view toward All Saints Church, a designated heritage asset and so this may be the reason for its inclusion. However, this is not stated anywhere. Furthermore, the church is likely visible from multiple locations within the village so it is not clear why this particular vista has been identified.
- 2.10 Similarly, **Vista 3**'s brief description suggests that it is a view toward a Cedar Tree which makes it important. However, it is not clear why this Cedar Tree is important or why this particular view is significant to the extent that it warrant protection. As with Vista 1, the tree is likely to be visible from multiple locations around the village and so an explanation of why this specific view is significant is required.
- 2.11 For the other views, the justification is even more sparse. It is clear from the subsequent chapter that the field opposite the school is valued by the community; however, it is not obvious why the identified view (**Vista 2**) is important.
- 2.12 Pegasus Group have undertaken their own analysis of the identified Vista 2 within a Landscape Statement to understand its significance. The conclusion of that analysis set out at paragraphs 3.18-3.21 is provided below and the detailed Landscape Statement is appended to these representations for reference.

*"No justification, technical analysis or criteria that identifies the distinctive features of the site, historic significance and/or interrelationship between the school and the site, or other merit of the particular significance of the view have been presented in the NP. The reasoning as to why the proposed origin point for the 'key view' is not stated, i.e. why this particular location is significant or why it was selected.*

*Primary access to the school has migrated to the north and east following the establishment of the village hub. Incidental views from limited areas of the school's southern playground have therefore been diluted further by the new access.*

*Reference to the site being a 'Green' is misleading as it comprises an unremarkable and undesignated private parcel of farmland*

*surrounded by 20<sup>th</sup> century housing. Views from the school playground are limited by neighbouring development and boundary treatments to localised areas. Such views are drawn to the housing that surrounds and encloses the site, rather than of the site itself, and are frequently viewed across a foreground of parked cars and other vehicles that occupy the immediate foreground adjacent to the boundary of the playground.*

*In conclusion, the importance and value of the school playground and views from it toward and of the site are unfounded and so there is no reasoned justification for the designation of a 'Notable Vista' from the school playground to the site and it should be removed from the NP."*

- 2.13 **Vista 4** appears to be nothing more than a view across an agricultural field towards a cluster of trees. Again, one would imagine that such views are fairly common along the footpaths in and around the village. As such, it is unclear why this particular view is demonstrably special and requiring protection.
- 2.14 Furthermore, the vistas do not appear to have been derived from the responses from residents to the questionnaire which was circulated to residents. Residents did not express any views on the vistas identified nor were they given the opportunity to suggest important vistas in their responses. As such, it is not clear whether the views identified are indeed supported by the community, or simply an opinion expressed by the author(s) of the Plan.
- 2.15 In the absence of a robust evidence base to support the identification of these vistas, Policy LP1 and the relevant supporting text should be removed from the Plan. Alternatively, we would suggest that a Landscape Visual Appraisal/Assessment is prepared to identify important vistas within the village that are genuinely worthy of protection. The NP could then identify these and set out policies to secure their protection based upon evidence.

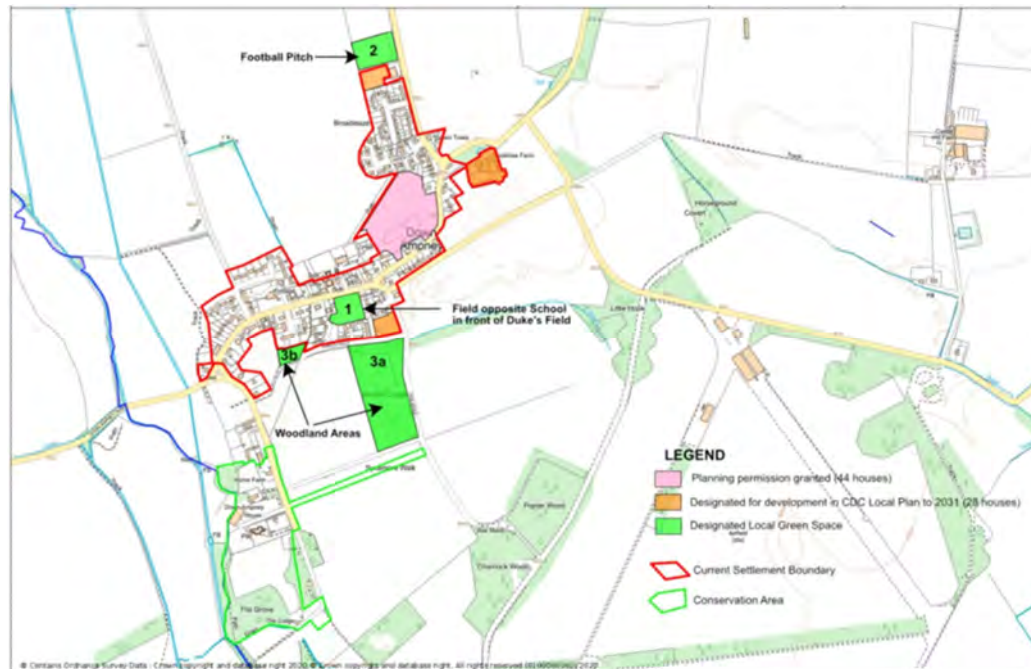
### **Proposed Local Green Space Designations**

- 2.16 The Landscape Chapter then proceeds to identify four areas to be designated as Local Green Space. The proposed areas are:
- Area 1 - The field opposite the village school (Land south of Charlham Way)
  - Area 2 - The local football pitch on the north-east edge of the village



- Areas 3a and 3b - Two areas of woodland on the southern edge of the village.

2.17 These are highlighted at Figure 3.7 of the NP, an extract of which is provided below:



**FIGURE 3: PROPOSED LOCAL GREEN SPACE DESIGNATIONS**

2.18 Paragraph 101 of the NPPF establishes the right of communities to protect green areas of particular importance to them through Local and Neighbourhood Plans. This essentially places a level of protection on said land, akin to that afforded to land designated as Green Belt (Paragraph 103).

2.19 However, paragraph 101 indicates that the designation of Local Green Space (LGS) needs to contribute to the delivery of sustainable development and complement investment in sufficient homes, jobs and other essential services. In other words, the designation of land as LGS should not hinder the wider objectives of delivering sustainable development, meeting housing needs, facilitating economic growth and delivering important services and facilities.

2.20 To this end, Paragraph 102 seeks to ensure that LGS designations are used appropriately by ensuring it meets the following criteria:

- a) The LGS is in reasonably close proximity to the community it serves;



b) The LGS is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) The LGS is local in character and is not an extensive tract of land.

2.21 For all four areas identified in the Plan, it is considered that criterion a) and c) are satisfied. All of the areas are in close proximity to the community they serve, and none would be considered an extensive tract of land.

2.22 However, the NP has not shown that any of the land identified is demonstrably special to the local community and holds a particular local significance. This is because the decision to designate this land is derived from the results of the survey circulated to residents in September 2019 ('the survey'). However, neither the framing of the question nor the responses from residents show that any of the sites identified are **demonstrably significant** to the local community.

2.23 Question 5 of the survey asked three questions as follows:

Our Natural Environment					
5	Are you satisfied with the amount and quality of open green spaces in the village?			Yes	No
	Thinking about our green spaces and open areas, please respond to the following statements	Strongly Agree	Agree	Disagree	Strongly Disagree
A	All green spaces and open areas should be protected from development				
B	Some green spaces and open areas should be protected from development				
C	If you agreed or strongly agreed with B above, please tell us which areas you feel should be protected:				

**FIGURE 4: EXTRACT FROM 'THE SURVEY'**

2.24 We note that the NP has concluded that the responses to the survey indicate strong levels of support for the proposed LGS designations. However, we consider this to be somewhat premature. The NP has based this conclusion partly on the basis that 90% of residents indicated that they were happy with the 'current green spaces'

and expressed a desire for these to be protected from development. However, 78% of these responses simply stated that all green spaces should be protected. As the NP indicates, the definition of 'open green space' in this context had a very broad definition and could have easily applied to all undeveloped land within and around the fringes of the village. It does not assist in the identification of specific areas which are valued by the community.

- 2.25 Indeed, only around 43% of respondents identified specific sites they would like to see protected. Unfortunately, the detailed comments identifying these sites are not provided within the Excel spreadsheet summarising the results of the survey.<sup>1</sup> As such, it is not clear what level of support there was for the proposed LGS sites or why the sites identified are considered to be important.
- 2.26 In any event, one can reasonably assume that not all responses supported every potential site and with only 43% of respondents identifying one or more sites, it does not suggest that there is overwhelming support for the LGS designation on any of the proposed sites.
- 2.27 Turning to the specific sites identified, there is no in principle objection to the playing pitches being designated as LGS (**Site 2**). The football club performs an important role within the community and so is of some recreational value (albeit we would note that almost 80% of residents never use the facility)<sup>2</sup>. However, Policy INF2 provides protection against the loss of public open space and other community facilities, as does Paragraph 99 of the NPPF. As such, it is not clear why an added level of protection (LGS) is required in this instance.
- 2.28 **Sites 3a and 3b** are identified in the Plan as worthy of protection on the basis that they provide a recreational value to the community and are frequently used by walkers. This may be supported in the responses to the survey that we requested; however, in the absence of this information, it would be premature to conclude that an LGS designation would be appropriate. We reserve the right to comment further once this information is presented.
- 2.29 We strongly object to the designation of **Site 1** as Local Green Space. The NP is attempting to justify the inclusion of this land based on:

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<sup>1</sup> These were requested from the Parish Council on 4th January and at the time of submitting these representations had not been received.

<sup>2</sup> See 5.2.1 of NP.

- The Survey responses suggested it be protected (which we are unable to verify); and
- It is akin to a 'village green' which is daily visible to all as a tranquil spot very often containing grazing livestock.

2.30 Our supporting Landscape Statement (paragraph 3.49) considers whether the proposed LGS designation meets the tests set out in Paragraph 102 of the NPPF. It concludes that the site fails to meet the criteria of bullet b) on the basis that:

- It is unremarkable and has unremarkable inherent natural beauty;
- Is recent in origin being enclosed and defined by neighbouring 20th Century developments and has no historic significance;
- Is in private ownership and so has no recreational value to the community;
- Reference to the site as a 'village green' is misleading as it comprises an unremarkable and undesignated private parcel of farmland surrounded by 20th century housing;
- Is subject to disturbance from neighbouring developments and traffic and cannot be considered tranquil; and
- Possesses habitats of limited ecological interest and biodiversity.

#### **APPENDIX 1: LANDSCAPE STATEMENT**

2.31 The proposed designation of the site does not accord with paragraph 102 of the NPPF and so Policy LP2 should remove LGS Site 1 accordingly. Otherwise, the NP does not accord with National Policy and fails the basic conditions test as a result.

### 3. CHAPTER 4 – INFRASTRUCTURE: ROADS, TRANSPORT AND DRAINAGE

- 3.1 Chapters 4 and 5 seek to address local infrastructure needs. Chapter 4 is specifically focussed on transport and drainage matters.
- 3.2 **Section 4.2** supports the provision of greater levels of public transport. A key reason for this is to provide residents (particularly those in affordable housing) with a viable and realistic alternative to the private motor vehicle to access jobs, services and facilities in Cirencester, Lechlade and Fairford.
- 3.3 We support the aspiration to improve public transport connectivity between the village and other settlements. However, the parish needs to note that this will require a significant increase in the number of users to make any increased frequencies sustainable over the longer term. In simple terms, this will necessitate an increase in the number of residents within the villages served by specific routes and this will require additional development.
- 3.4 We appreciate that Recommendation IR2 is just a recommendation; however, there is an element of putting the cart before the horse in encouraging public transport use without delivering the critical mass required to support it. If the NP is serious about improving local public transport services, then it needs to support additional development at the village to deliver the requisite critical mass to deliver this.
- 3.5 At **Section 4.3**, we note residents' concerns regarding drainage infrastructure within the village; however, it is important to note that this should not preclude development. Indeed, it is a requirement of new development to ensure that there is a betterment in terms of surface water drainage within the site and to ensure that there is no adverse impact on the surrounding area. New development would actually address surface water drainage issues, rather than exacerbate them.
- 3.6 The same principle applies to foul water drainage and additional development can help to facilitate improvements to the network, assuming it is demonstrated that this would be necessary to mitigate the impacts of new development.

#### **4. CHAPTER 5 – INFRASTRUCTURE: COMMUNITY AND LEISURE**

- 4.1 Chapter 5 begins by identifying the various services and facilities within the village and summarising their level of use by those who responded to the survey.
- 4.2 We note that the village hall, village shop and post office were the most used facilities, with the parish church also well used. It is important to ensure that these services continue to be supported. Growth in the village and the overall population can ensure that the requisite critical mass is maintained to support these services, particularly the village shop.
- 4.3 This principle also applies to the local primary school which will need to continue to enrol a minimum number of pupils to justify its operation, or face the risk of closure.
- 4.4 Paragraph 5.2.2 also notes the strong desire for a village pub. Again, the village needs to develop a sufficient critical mass and/or develop a strategy to bring in external trade to support this service if this is to be delivered and sustained over the long-term.
- 4.5 Facilitating new development can both support existing services and deliver others as the overall population expands and local expenditure increases.
- 4.6 At paragraphs 5.4.2-5.4.3, the NP confirms that the majority of residents (68%) are broadly satisfied with their access to the countryside. However, concerns have been raised regarding signage, the condition of footpaths, lack of cycle appropriate routes, lack of circular routes and accessibility issues due to styles or gates.
- 4.7 Many of these issues could be addressed through the provision of well-designed and thoughtfully planned public open space in any new development which, depending on its scale, could deliver improved opportunities for walking/cycling by creating new footpaths and connectivity between established routes as pieces of a jigsaw to ultimately provide circular walks around the village.
- 4.8 Land around the north and north-west of the village where a permissive path already exists could be a potential candidate for improvement and facilitated by additional development in this location (e.g. as an extension to the Broadway Farm scheme and/or Chestnut Close development).

## **5. CHAPTER 6 - ECONOMY, EMPLOYMENT AND TOURISM**

- 5.1 We agree with the supportive approach to new employment and tourism development within the village. Indeed, improving the number of visitors to the village (both frequent and infrequent) could help support the delivery of additional facilities and services within it (e.g. a destination pub).
- 5.2 As suggested above, the delivery of additional open space and walking routes could draw visitors to the village (e.g. dog walkers, young families) who may then use the village shop or a public house afterward.
- 5.3 Whilst efforts to improve the information available to visitors about Down Ampney's history are supported, the NP could be more ambitious in its efforts to boost tourism and businesses within the village.
- 5.4 The Parish should consider the potential benefits of additional housing development of varying scales in helping to deliver additional services and facilities which can have knock on benefits for the local community.

## **6. CHAPTER 7 - HOUSING**

6.1 The NPPF (Footnote 18) and Planning Practice Guidance (PPG) confirm that NPs must be in general conformity with the strategic policies contained in any development plan that covers their geographical area. This principle extends to the delivery of housing and the purpose of NPs is not to arbitrarily constrain the supply of housing. In fact, their purpose is to help facilitate the delivery of additional housing to meet local and district wide needs, whilst steering it to the most appropriate locations.

6.2 In addressing housing needs through the NP, the starting point is to assess whether existing commitments support the district's needs and if local needs are being met. These are considered in turn below.

### **Meeting district-wide housing needs**

6.3 The adopted Local Plan identifies an annual requirement of 420 dwellings per annum (8,400 dwellings over the plan period to 2031). This requirement will be largely met through development at the 'Principal Settlements', of which Down Ampney is one. Development beyond the Principal Settlements is supported in certain specific circumstances but is not to be relied upon to deliver this overall housing requirement.

6.4 Policy S4 of the adopted Local Plan identifies three site allocations to deliver 28 dwellings at Down Ampney (Dukes Field, Rooktree Farm and Land adjacent to Broadleaze). In addition to this, 44 dwellings were previously approved on Land at Broadway Farm. This means that there are commitments to deliver 72 dwellings within the village over the plan period. This will be supplemented through further windfall development, residential conversions and subdivisions etc. At present, it is likely that somewhere in the region of 75-90 dwellings will be completed within the village and surrounding parish before the end of the plan period (2031). This equates to around 1% of the housing requirement expected to be delivered at the Principal Settlements over the plan period.

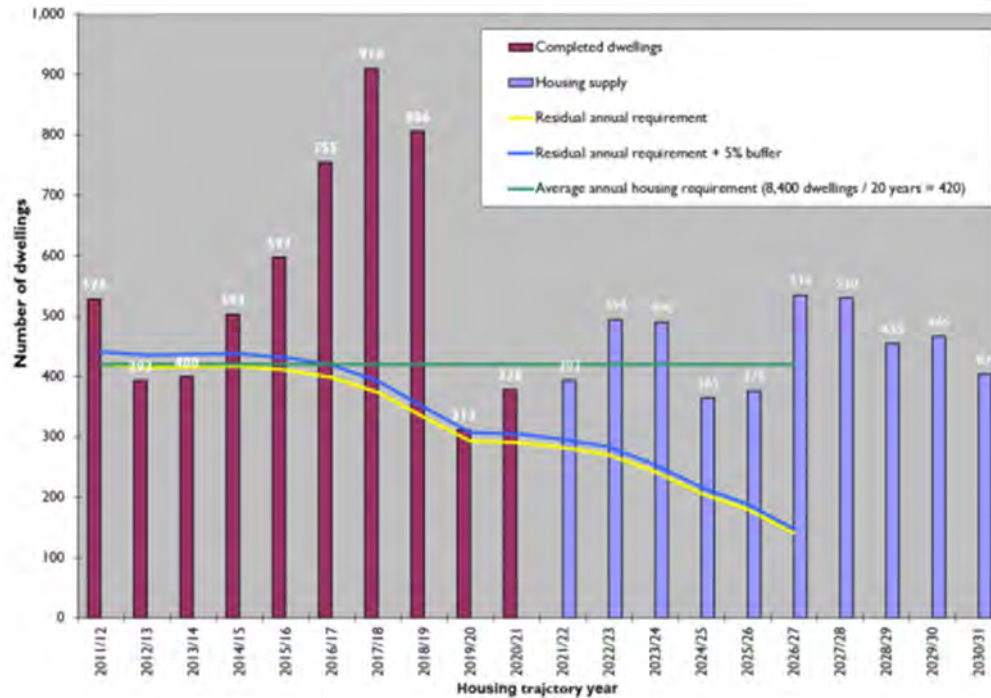
6.5 As the NP notes, Down Ampney contributes only around 1.4% of the population of all principal settlements. As such, the NP considers that Down Ampney has largely met its housing requirement under the adopted Local Plan and significant growth beyond this is not required.

- 6.6 Furthermore, the District Council can currently demonstrate an up-to-date supply of housing land and, when one considers the supply of housing at the Principal Settlements as a whole, there appears to be no immediate need to allocate additional land in the NP to meet the Local Plan target. To summarise, the Council's housing trajectory indicates that there is a supply of 10,115 dwellings over the plan period, against a requirement of 8,400 dwellings.
- 6.7 However, the Council are progressing a Partial Update to the Local Plan, consultation on which started in February 2022 (Regulation 18: Issues and Options). In this consultation, the Council has identified a need to deliver a further 900 dwellings to ensure a five-year housing land supply is maintained over the remainder of the plan period to 2031. The Topic Paper on Housing Need, Requirement, Land Supply and Delivery confirms that sites will be allocated from a shortlist of potential development sites from the SHELAA in line with the adopted Local Plan's spatial strategy which distributed this among the Principal Settlements.
- 6.8 Furthermore, given the shift upwards in the Council's annual housing requirement, it is possible that an Local Plan Inspector will no longer allow the Council to 'bank' its past oversupply to reduce its housing requirement for the purposes of five-year housing land supply calculations.<sup>3</sup> This could uplift the residual requirement that would need to be planned for under the Local Plan Partial Update still higher.

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<sup>3</sup> See relevant appeal decisions APP/G1630/W/17/3184272, APP/J0405/W/16/3158833 and APP/F4410/W/16/3158500





**FIGURE 5: COTSWOLD DISTRICT COUNCIL HOUSING TRAJECTORY  
(OCTOBER 2021)**

- 6.9 Regardless of what the residual requirement will be, Down Ampney is a Principal Settlement and will need to contribute toward housing delivery. On the basis that Down Ampney makes up around 1.4% of the population of the Principal Settlements, this could require it to contribute at least 10-15<sup>4</sup> additional dwellings beyond its current Local Plan allocations and commitments to 2031.
- 6.10 Taken together, it is considered that Down Ampney will still need to deliver further development beyond that allocated in the adopted Local Plan and with planning permission to meet the District's wider housing needs up until the end of the current Plan period in 2031. The current NP should, therefore, look to allocate land for development at this scale **as a minimum**.

### Meeting local housing needs

- 6.11 In preparing a NP, one would typically expect a Local Housing Needs Survey (LHNS) to be prepared to understand the level of need and demand for housing within the locality of the Plan area. This can also identify specific types of housing that may

<sup>4</sup>  $900 \times 0.014 = 12.6$ . This is expressed as a range on the basis that there is an element of judgement in the distribution of housing.

be required which would, in turn, inform housing mix policies. A LHNS has not been prepared in support of the NP. However, residents were asked their thoughts on the principle of additional development, the type of homes they would like to see delivered and where this should be delivered. This provides a useful starting point in identifying potential demand for housing but does not constitute a comprehensive LHNS as one would typically expect to support a NP.

- 6.12 47% of respondents (96 in total) supported the delivery of new housing whilst 46% opposed it. Whilst respondents were admittedly divided, this is a strong indication that there is a need/demand for additional housing in the village from a number of residents.
- 6.13 Question 9 of the survey asked respondents what type of housing is required within the village. In response to this question there was more than 50% support for affordable housing, housing for key workers and small houses for purchase. Whilst this is not stated explicitly, those supporting additional development within the village are likely to be those who are unable to afford to currently buy/rent a property in the locality, or those who can afford to live in the area, but are in unsuitable accommodation (e.g. elderly residents looking to downsize or families wanting larger accommodation).
- 6.14 There was also strong support for rental properties in the village in the survey as well as specialist housing for older people and some larger houses for purchase. Whilst we note that there were a greater number of respondents actively opposing these types of housing, there was still considerable support for these types of housing. One can reasonably assume that some of these respondents are in need of this type of housing.
- 6.15 Whilst the survey has fallen short in terms of properly identifying Local Housing Needs, it is clear that there are housing needs among residents that are not being met by existing development. This is reflected in the broader support for more housing and the type that residents are suggesting is needed.
- 6.16 However, this current evidence base is insufficient to understand the actual needs of residents within the parish. We would strongly encourage the preparation of a Local Housing Needs survey to establish the full needs of residents, what impact committed development will have on meeting those needs and what additional development may be required.

### Affordable Housing Needs

- 6.17 As noted above, there was strong support for the delivery of affordable housing for people with a local connection (70% of respondents). The most effective way of delivering affordable housing is through major development schemes (10+ dwellings). The NPPF is clear in that affordable housing and other planning obligations should not be sought for minor development.
- 6.18 Whilst lower thresholds can be applied in rural areas (e.g. 5 dwellings or less), this only applies to rural areas with a population of **at least 3,000 residents**. Down Ampney falls short of this threshold by some distance and so a lower threshold cannot be applied.
- 6.19 The site at Duke's Field allocated in the Local Plan for 10 units would have delivered 4 units of affordable housing. However, this was refused planning permission in January 2022 (ref: 21/00949/FUL) on the grounds of causing harm to the character and appearance of the locality and the setting of the village. It is questionable therefore whether this site will deliver the affordable housing it was intended to.
- 6.20 For developments delivering 9 dwellings or less, there is no obligation to deliver affordable housing. As such, if the NP is to deliver affordable housing, this will require the identification of additional sites for the development of 10 dwellings or more.
- 6.21 Further to this, establishing the need for affordable housing could be a good way of identifying an overall housing requirement for the parish. For example, if there was a need for 8 affordable dwellings within the parish, then a site for 20 dwellings (with a 40% affordable housing contribution) could be identified on the basis that this would deliver housing to meet local affordable needs.

### Protection under Paragraph 14 of the NPPF

- 6.22 Paragraph 14 of the NPPF provides additional protection against speculative development in the event that the tilted balance applies (e.g. where the Housing Land Supply position is below 5 years, or relevant policies are considered to be out of date). The paragraph confirms that where there is a conflict with the Neighbourhood Plan, this will likely significantly and demonstrably outweigh the benefits of development provided ***all of the following apply***:

- a) *the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;*
- b) ***the neighbourhood plan contains policies and allocations to meet its identified housing requirement;***
- c) *the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and*
- d) *the local planning authority's housing delivery was at least 45% of that required<sup>10</sup> over the previous three years*

6.23 If the NP wishes to benefit from this added layer of protection, then it needs to allocate land for further housing to meet an identified need. Again, this is why we would encourage the NP to prepare a detailed LHNS to identify any additional needs not met by current commitments and allocate land accordingly.

#### **Summary on Housing Needs**

6.24 The NP does not currently allocate any land for housing within it. This is something that we would strongly urge the parish to reconsider given that:

- As part of the District Council's Partial Update of its Local Plan, it is likely that Down Ampney as a Principal Settlement will be required to support the delivery of the district's wider housing needs;
- It is likely that, as a minimum, there will be a need to deliver somewhere in the region of 10-15 additional dwellings at the village by the end of 2031;
- There is a good level of support for further housing in the village and this needs to be explored in detail through a local housing needs survey;
- Small scale development is unlikely to deliver any affordable housing and so schemes of 10 or more dwellings should be considered to meet any identified affordable needs;

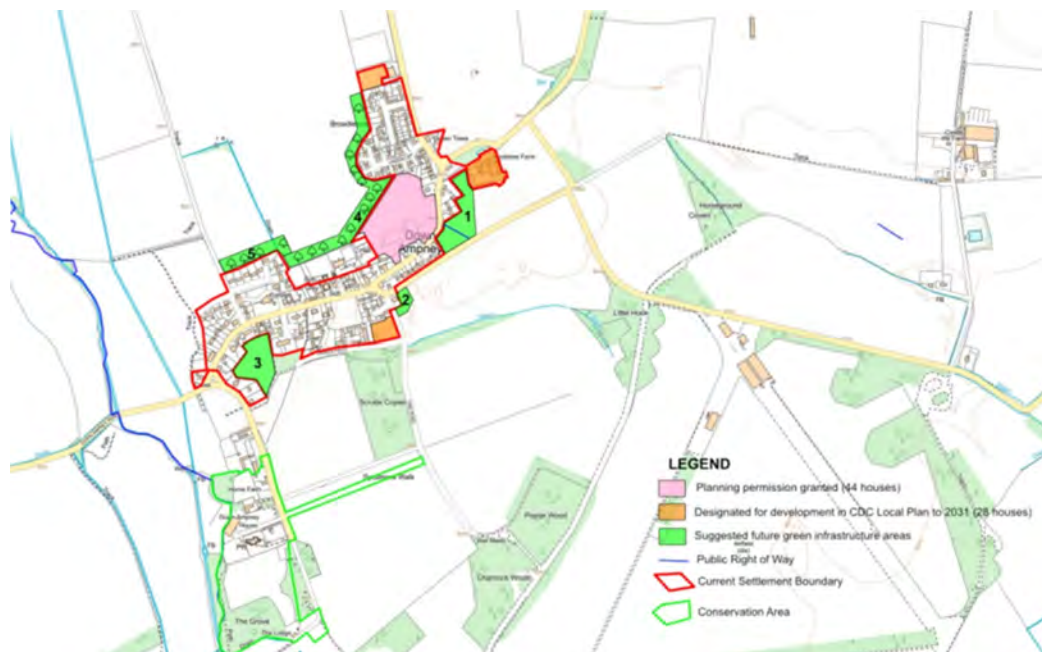
- The NP needs to allocate sites to meet an identified local need in order to benefit fully from the protections afforded by Paragraph 14 of the NPPF.

6.25 On this basis, we would suggest that a Local Housing Needs Assessment is prepared and the NP delayed until the Local Plan Partial Update has set out the scale of additional housing required within the Regulation 19 consultation on the Local Plan. This will provide a clearer idea of the housing needs that the NP should plan for and whether additional allocations are necessary.

6.26 This will also ensure that the NP is prepared on a robust evidence base and avoid the need to immediately review it once the Local Plan Partial Update is adopted.

### Green Infrastructure

6.27 Within the Housing Chapter, there is some commentary on the need for Green Infrastructure to be delivered within the village. Suggestions on where this should be provided are presented in Figure 7.9. This figure is provided below for reference.



**FIGURE 6: SUGGESTED AREAS FOR GREEN INFRASTRUCTURE**

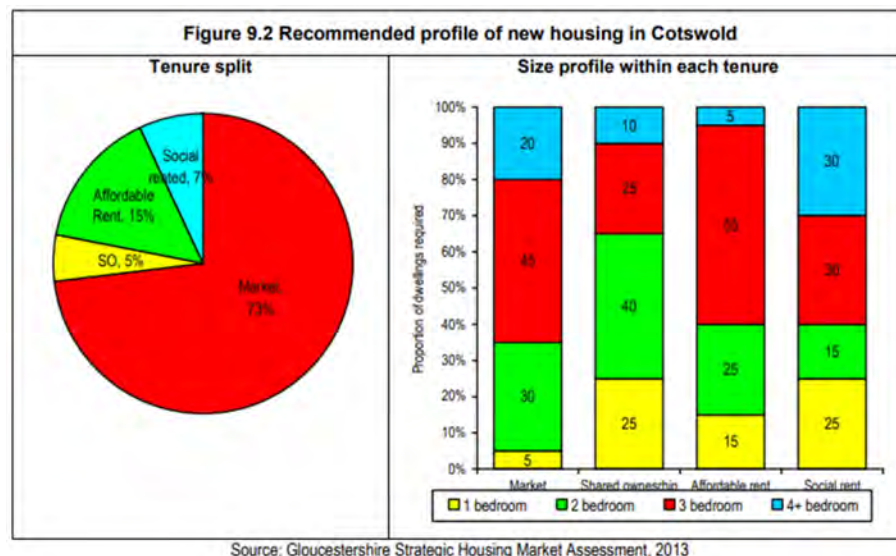
6.28 Whilst we support the delivery of high-quality Green Infrastructure within new development as a general principle, attempting to guide where this should be located in the NP is not appropriate. The location of Green Infrastructure within

new development needs to be determined based on a review of site-specific constraints and opportunities.

- 6.29 The identification of the location and extent of these specific areas has not been supported by any technical work and so it would not be justified to enshrine it in any formal policy. Indeed, we note that the NP does not seek to do this, with Policy HP5 confirming that the provision of Green Infrastructure will be addressed at the planning application stage. In the absence of any supporting technical work, we consider that the NP should not go beyond expressing support for the provision of high-quality Green Infrastructure in new development and not identify any particular parcels of land.

### Policy HP1

- 6.30 Policy HP1 seeks to control the type of housing delivered within the village. The two key elements are that at least 65% of the housing delivered is comprised of 1-3 bedroom properties and that 5% of dwellings be provided as bungalows.
- 6.31 Regarding the former, there is no objection to this threshold as it broadly aligns with the evidence set out in the Council's SHMA, and Policy H1 of the Local Plan requires proposals to take account of this evidence when proposing housing mixes. The SHMA recommends that between 70% and 95% of all new homes should be 1-3 bedrooms, depending on their tenure. The NP is, therefore, taking a more flexible approach.



**FIGURE 7: GLOUCESTERSHIRE SHMA EXTRACT**

- 6.32 However, the assumption is that this threshold has been derived from the responses to the survey. Whilst the survey has provided a useful starting point, it has fallen short in obtaining up to date evidence about the actual need for certain types of housing within the district. There needs to be an assessment of need at the individual level. Evidence needs to be obtained in relation to an individual's current circumstances, their desire to move, their need to move, what they can afford to move to, whether they would need to rent etc. This would then determine exactly what type of housing is required within the village and provide a more robust evidence base from which to develop a housing mix policy.
- 6.33 This same issue applies to the 5% bungalow target. In short, it is not clear what the basis is for this. Whilst 82 respondents supported the provision of bungalows, it does not follow that there are 82 households or individuals in need of bungalows. However, how this has translated into the 5% requirement is not explained or justified either.
- 6.34 Paragraph 31 of the NPPF is clear in that all policies should be underpinned by relevant and up-to-date evidence.
- 6.35 Furthermore, it is unclear how the policy will be applied to developments for less than 20 dwellings, or where only part of a bungalow would be required. The policy should provide some clarity on this.
- 6.36 Finally, it is difficult to see how this approach will deliver any bungalows, given that the NP does not allocate any sites for development, all allocated/committed sites are set to deliver 10 dwellings or less and the Broadway Farm scheme has already had its housing mix agreed.
- 6.37 Again, this policy is not considered to be justified by the evidence and a Local Housing Needs survey should be prepared to inform any housing mix aspirations or guidance in the NP.

#### **Paragraph 7.6.2**

- 6.38 Paragraph 7.6.2 states that no more than 15 dwellings should be constructed in any year. Whilst this is not a formal policy, it is beyond the remit of a NP to control the release of housing to the market and attempting to limit it runs counter to the Government's policy to significantly boost the supply of housing (Paragraph 60 of the NPPF). This sentence should be deleted accordingly.



## 7. POTENTIAL HOUSING DEVELOPMENT SITES

- 7.1 For the reasons stated above, the NP should consider additional residential development and a number of parcels of land which are within the Co-op's ownership are set out below for consideration for allocation, in whole or in part, to meet future housing requirements in the shorter term to 2031. Site location plans for the individual sites are appended to these representations.

### APPENDIX 2: SITE LOCATION PLANS

#### Site 1 – Land Adjacent to Chestnut Close



**FIGURE 8: LAND ADJACENT TO CHESTNUT CLOSE SITE LOCATION**

- 7.2 The Co-op control a large field which wraps around the north-western edge of Down Ampney, adjoining Down Ampney Road and Chestnut Close. The majority of this field lies in Flood Zone 2/3; however, around 2.29ha immediately adjacent to Chestnut Close lies in Flood Zone 1.
- 7.3 A review of the relevant planning designations in the adopted Local Plan indicates that there are no obvious constraints to development. The site would be suitable for residential development with an estimated capacity of up to 40 homes based



upon a density of 30 dph on 60% of the site area. However, smaller scale development could be delivered within the southern half if the Local Plan Partial Update context dictated.

- 7.4 This site would be an excellent candidate for allocation in the event that only a modest amount of extra housing was required in the village in the short term (i.e. in line with the 10-15 dwelling target we have identified in Section 6 of these representations).

#### **Site 2 – Little Jim's Paddock and adjoining land**

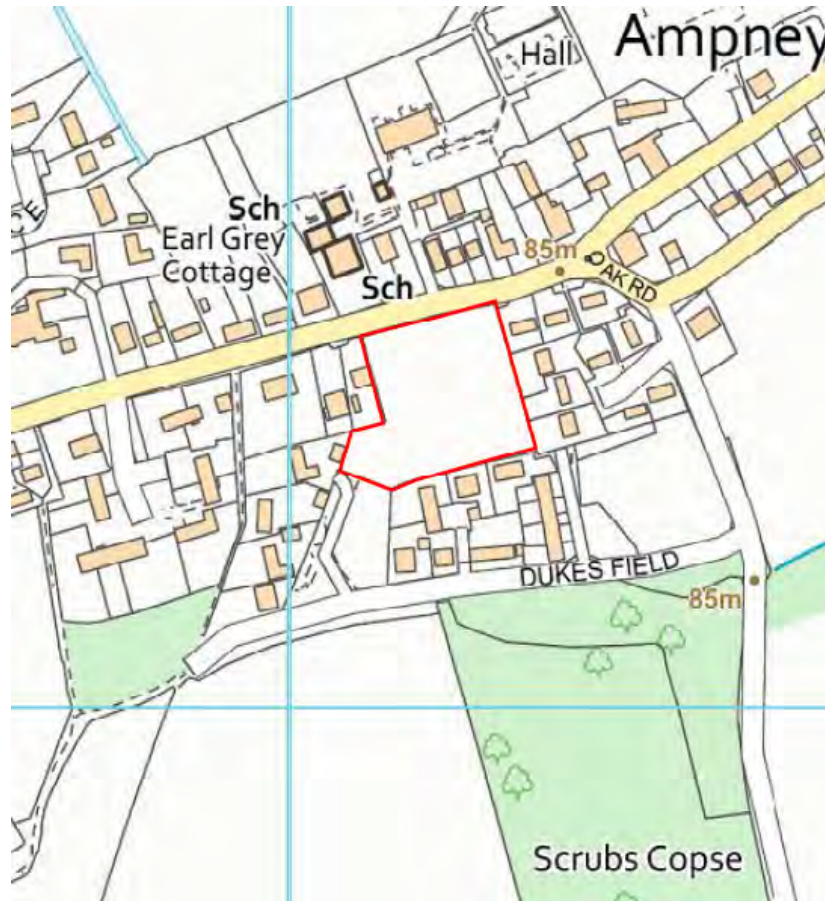


**FIGURE 9: LITTLE JIM'S PADDOCK SITE LOCATION**

- 7.5 The Co-op control around 2.4ha of land on the south-western edge of Down Ampney. This comprises the field known as 'Little Jim's' and some additional land beyond it to the south and east. The woodland area within the eastern part of the site is proposed to be designated as Local Green Space in the draft NP.

- 7.6 Vehicular access could be taken from the south-west whilst pedestrian connectivity to the main village can be provided via the existing footpath network in the surrounding area. There are a handful of trees on site which pose a minor constraint to development but it is otherwise unaffected by any substantive planning designations.
- 7.7 We also note that the site is affected by an 'important vista' in the NP, however, it is not considered that this policy has been justified (see above). Regardless, we still consider the site to have some potential for development.
- 7.8 The site could also potentially deliver some Green Infrastructure, as part of a carefully designed layout.
- 7.9 Depending on the outcome of further technical work, the site could likely accommodate up to 40 dwellings. This assumes 30dph on 60% of the net developable area.
- 7.10 Again, this site would be an excellent candidate for allocation in the event that only a modest amount of extra housing was required in the village in the short term (i.e. in line with the 10-15 dwelling target we have identified in Section 6 of these representations).

### Site 3 – Charlham Way



**FIGURE 10: LAND AT CHARLHAM WAY SITE LOCATION**

- 7.11 The land at Charlham Way is currently subject to an undetermined outline planning application for up to 8 homes (ref: 21/04185/OUT). Its sustainable location, close to the village school, shop, village hall and recreation facilities and its status free of any adopted Local Plan designations makes it a worthy candidate for allocation.
- 7.12 We note that in the draft NP it is designated as Local Green Space and close to a notable vista but for the reasons we state in section 2 and the appended Landscape Statement, we do not believe that designation is justified.

## **APPENDIX 1**

### **LANDSCAPE STATEMENT**

## DOWN AMPNEY NEIGHBOURHOOD PLAN

# LAND SOUTH OF CHARLHAM WAY, DOWN AMPNEY

## LANDSCAPE STATEMENT

ON BEHALF OF THE CO-OPERATIVE GROUP

**Prepared by:** Alison Smith CMLI

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## 1. INTRODUCTION

- 1.1 This Landscape Statement presents a landscape and visual analysis that has been prepared on behalf of the Co-operative Group (hereafter the 'Co-op') relating to both its representations to the draft Down Ampney Neighbourhood Development Plan (December 2021, Regulation 14 Issue) (hereafter referred to as the NHP) prepared by Down Ampney Parish Council Steering Group and the pending planning application for up to 8 dwellings at land south of Charlham Way (planning application reference 21/04182/OUT).
- 1.2 The purpose of this analysis is to inform the consultation process regarding landscape and visual sensitivities of land in Co-op's ownership to the south of Charlham Way ('the site') that is the subject of the pending planning application, in relation to proposals within the NHP for the proposed designation of:
- Policy LP1 (Figure 3.6) - A Notable Vista comprising the view from the school playground toward the site;
  - Policy LP2 (Figure 3.7) - The site as Local Green Space; and
  - Policy HP5 (Figure 7.9) - Green Infrastructure within the village of Down Ampney.
- 1.3 The analysis will also review the appropriateness of the proposed development with regard to the landscape and townscape character of the village context. In relation to the pending planning application, it assesses the proposed development and its accordancy with paragraphs 6.2.4 to 6.2.6 of the Local Plan.
- 1.4 An initial desk-top study was carried out to review a range of published information relating to the site and the surrounding area, including planning policy of relevance to landscape matters, landscape designations, landscape character assessments and the accompanying guidance. The planning application and relevant information submitted with it have been reviewed including the Heritage Desk Based Assessment ('**Heritage DBA**') and Tree Drawings, Arboricultural Method Statement, Tree Report and Tree Schedule ('**Tree Survey package**'). Site visits were carried out in January 2022 to review the findings of the desk-top study and to inform this Landscape Statement.
- 1.5 This report has been prepared by a Chartered Member of the Landscape Institute, with reference to best practice guidance, including Guidelines for Landscape and Visual Impact Assessment Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (GLVIA3). The analysis carried out considers a range of factors, including *inter alia*:



- topography;
- landcover;
- tree cover;
- land use;
- settlement pattern and human influence;
- boundaries and enclosure pattern;
- General visibility – landform influences; tree and woodland cover; inter-visibility; and
- Landscape designations.

## 2. THE SITE AND ITS SURROUNDING CONTEXT

### Location

- 2.1 With reference to the **Environmental Designations Plan** at **Appendix 1**, the site lies to the south of Charlham Way, which forms the main road through Down Ampney village, to the south/southeast of Down Ampney Primary School, opposite the access to Down Ampney Village Hall. The site is generally square in shape (c.71m x c.69m) with a small broadly pentagon-shaped western extension toward the southwest corner. The site is currently laid to undulating sheep-grazed pasture with mature and semi-mature specimen trees along the north and eastern edges; trees identified as T1 – T7 in the documents that comprise **Tree Survey** package are subject to a Tree Preservation Order (Ref: TPO 443). A short metal post set into a low concrete plinth lies slightly off-centre within the site. Overhead telephone lines criss-cross the site supported by wooden poles.
- 2.2 Residential properties and the school surround the site. To the north lies the school and a pair of cottages contemporary with the school (numbers 16 and 17 Charlham Way) and one bungalow and two detached houses that date from the late 20<sup>th</sup> century. To the east lies one house that fronts Charlham Way and three houses that occupy a cul-de-sac called The Pheasantry. To the south and southwest are the two-storey houses of a development called Duke's Field, built c.2002. To the west lies two mid- to late-20<sup>th</sup> century bungalows ('Wychwood' and 'Wansley').
- 2.3 The site is bound along the northern edge by a stone wall; access is via a timber 5-bar gate set about mid-way along this wall. A tarmac footway lies between the southern edge of Charlham Way and the stone boundary wall. The eastern site boundary is formed by a taller stone wall (and integrated small stone structure) enclosing the rear gardens of The Pheasantry (sections of this wall pre-date properties at The Pheasantry and may be remnants of building(s) that formerly abutted the site, see Heritage DBA, paragraph 5.27. The southern boundary adjacent to the rear gardens of Duke's Field is defined by a timber post and rail fence reinforced in part by a well-maintained hedge. The western boundary is defined by a post and wire fence, backed by tall (c.18m/6ft) wooden fence panels and a short length of evergreen hedge of the adjacent bungalow known as Wychwood. Each of the neighbouring dwellings to the east, south and west present rear or side elevations to the site. Boundaries to these properties as described screen ground level views toward the site.

## Designations

2.4 The site is not subject to any landscape, ecological or heritage designations (**Appendix 1**).

2.5 Ten Grade II Listed Buildings are located along Charlham Way, which was historically referred to as 'Down Ampney'. Listed buildings closest to the site include the village school, numbers 42 and 43, 16 and 17 and number 20 ('East House') Down Ampney; a further seven Grade II Listed Buildings and two Grade I Listed Buildings (the Church of All Saints and Down Ampney House) are located within Down Ampney Conservation Area, c. 365m southwest of the site at its closest point (see **Heritage DBA**). The Heritage DBA notes at paragraph 6.7:

**"No specific associations or designed views were identified for the Grade II Listed Down, and 20 Down Ampney, all situated within close proximity of the site along the road through the village...The site does not contribute through setting to the significance of any of these assets. Direct intervisibility was, however, identified for 16 & 17 Down Ampney: a pair of cottages located on the north side of the road opposite the site..."**

2.6 A tithe map, dated 1843, shows several buildings within the site (see Appendix 2, with tithe map reproduced from Heritage DBA). Further, the Heritage DBA notes at paragraph 6.11 that numbers 16 and 17 Down Ampney are not shown on the 1843 tithe map, but both they, the school, and other new cottages were built around the same time and appear on the 1875 OS map. During this period, buildings within the site as shown on the tithe map, which were incrementally removed by 1903 with one structure remaining in the northeast corner. Paragraph 6.13 of the Heritage DBA concludes:

**"There are only glimpsed views of the front elevations of the cottages (no.s 16 and 17) from the site, due to the screening provided by trees within the northern part of the site and vegetation within the front gardens...These are not considered key views of the asset."**

## Historic Development Context

2.7 The Heritage DBA describes the village during the Early Medieval (410AD – 1066) and Medieval (1066 – 1539) periods, and states at paragraph 5.21:

**"The manor house, described as 'old' in 1270 AD, is believed to have stood on the site now occupied by Down Ampney House, a hall-house built in 1470 AD for the Hungerford family...The original medieval settlement was focussed on the manor house and the adjacent**

**Church of All Saints, consecrated in 1265 AD, but apparently shifted north following an outbreak of the plague in 1349 AD."**

- 2.8 Post-medieval (1540 – 1800) and Modern (1801 to present) periods are described in the Heritage DBA with reference to the 1843 tithe map and various Ordnance Survey (OS) maps (1903, 1921 and 1972-74). The Heritage DBA states at paragraphs 5.25 and 5.26:

**"5.25 The 1843 tithe map of Down Ampney...shows the medieval settlement core(s) around the church to the south, a second cluster of buildings around the junction of Down Ampney Road with Oak Road, and a third cluster further to the north that included Rooktree Farm.**

**5.26 The tithe map depicts several buildings within the site; a large building composed of two offset, linked, parallel ranges in the north-western corner; a small, square outbuilding in the north-eastern corner; and three or possibly four small, rectangular outbuildings in the centre. Abutting the outside of the eastern boundary of the site was another dwelling. The southern area of the site formed part of a larger paddock that included what is now the housing of Duke's Field."**

- 2.9 It is noted at paragraph 5.28 of the Heritage DBA that only the northern and central parts of the building in the northwest corner of the site, and a pair of cottages with an outhouse and two wells in the north-eastern corner of the site were depicted by the time of the first edition OS map of 1875.
- 2.10 The building in the north-eastern corner of the site appears on the 1889-90 and 1903 OS maps but seems to have been demolished by the time of the 1921 OS map (reproduced from the Heritage DBA at **Appendix 2**).
- 2.11 Publicly available current and historic aerial photography (Google Earth Pro accessed January 2022, <https://earth.google.com>) has been reviewed. Aerial photography dated 1999 shows that the site formed part of a larger reversed 'L' shaped parcel that included an egg packing plant at its southeast corner. Redevelopment of the egg packing plant and development at the southwest corner of this larger parcel, to what is now housing at Duke's Field, appears to be well advanced on the aerial photography dated 2003; at this point the current site boundary is established.
- 2.12 Down Ampney Airfield and scores of associated blast shelters were established during the Second World War to the southeast of the village; the airfield

boundary was about 510m from the southern boundary of the site at its closest point.

2.13 Comparison of the 1921 and 1972-74 OS maps (reproduced from the Heritage DBA at **Appendix 2: Historic Maps**) and recent site survey show incremental developments occurring along Charlham Way and around the site principally from the 1950's to present day. From north to south, this includes the Broadleaze/Linden Lea estate to the west of the Poulton road; a detached house and detached chalet bungalow (Grey Gables and Stoney Stile) to the south of Hampton Cottage near Rooktree Farm; semi-detached houses and bungalows that back onto the southern edge of Charlham Way to the east of the War Memorial/East House (Roystone, Kilkenny, Greystones, the Bungalow etc.); detached houses at The Pheasantry to the east of the site; detached houses at Duke's Field to the south and southwest of the site; bungalows Wychwood and Wansley to the east of the site; a bungalow and detached houses (including The Old Bakery, Bakery House and The Brambles), the village hall/shop, sports court, sports pitches and community garden to the north of the site; detached houses at The Old Forge Estate Yard, Cedar Close bungalows and two further bungalows to the west of the site; detached houses and bungalows to the north (Suffolk Place), east (fronting Charlham Way) and west of The Old Vicarage (fronting Charlham Lane), and detached houses to the west of the lane off Chestnut Close; a terrace of houses opposite the memorial cross at the junction of Charlham Way and Down Ampney Road, plus a pair of detached houses (Cherry Trees and Cranleigh) to the south of the junction.

2.14 Land toward the northern end of the village to the north of Little Court through to Linden Lea has planning permission for 44 houses.

2.15 Whilst the medieval buildings originally formed clusters around the manor/hall-house, church and key road junctions, today's built-form is principally that of a linear, ribbon, settlement of mixed building ages and styles along the frontages of Charlham Way; with the hall-house and church retained as outliers to the southwest.

### **Ecology/Biodiversity**

2.16 The site is not subject to any ecological or nature conservation designations. A Preliminary Ecological Appraisal (PEA) accompanies the planning application,

which identifies habitats that are of limited ecological interest and biodiversity.

The PEA Non-technical Summary states:

**“...At the time of the survey, the site comprised flat and level ground bordered by a stone wall to the north and east and a post and rail fence along the remainder of the boundary. The site was dominated by sheep-grazed improved grassland. Some small pockets of tall ruderal vegetation were present where the sheep had not grazed. To the north and west of the site stood seven mature trees comprising sycamore, horse chestnut and walnut. One was a dead specimen, but the others were in moderate to good condition with some damage to the canopy.”**

- 2.17 In addition, a Preliminary Ground Level Bat Roost Assessment was prepared by Middlemarch dated January 2022 which concluded that whilst 6 of the 7 trees have high bat roosting potential, as no pruning to those trees is proposed, no further surveys are required.

### 3. DRAFT NHP POLICIES RELATING TO THE SITE

#### Overview

3.1 The following sections of the Landscape Statement set out an analysis and critique of issues relating to proposed NHP policies:

- LP1: Notable Vistas,
- LP2: Local Green Spaces; and
- HP5: Green Infrastructure that affect the site. The critique considers:

3.2 Policy context is also considered in relation to Local Green Spaces.

#### Draft NHP Policy LP1: Notable Vistas

##### Notable Vista 2: Green from the School Playground

3.3 Section 3.4 of the NHP discusses 'Villagers' Views (The Questionnaire)'. Sub section 3.4.1 presents villagers' responses to the "strengths or positive features" relating to landscape as a vertical bar chart.

3.4 The second part of sub section 3.4.1 states:

**"Visual quality of the landscape and historic landscape character that defines the local distinctiveness is protected by CDC's Local Plan 2011-2031 Policy EN4 clause 2. One of the defining characteristics of Down Ampney is of a traditional Cotswold settlement located in open countryside, with the majority of households enjoying views across fields and all households having easy access to footpaths. Vistas of particular significance in Down Ampney building on this policy are shown on Figure 3.6 overleaf."**

3.5 Neighbourhood Plan Figure 3.6 is reproduced below and includes identified 'Notable Vista 2 – Green from the school playground'.





**Neighbourhood Plan - Figure 3.6 Notable Vistas**

3.6 Draft Policy LP1 states:

**"Policy LP1**

**Development proposals should take account of the identified key vistas (Figure 3.6) and be designed and located to safeguard their integrity. Any proposal which would have an unacceptable impact on an identified key vista will not be supported."**

---

### Evolution of School and Site

- 3.7 The site comprises an undulating agricultural parcel of land that is still used for sheep grazing. It is private land and has no public access.
- 3.8 Reference to historic mapping (1843 tithe map) demonstrates that the site was developed prior to construction of the school. The original school building (built 1853, enlarged 1880's) is set parallel to the road and perpendicular to the land boundaries (see historic maps) and so has a south-southwest aspect, as do buildings to the east and west of it. The historic maps also show the school building was sited centrally east-west within the school parcel thus maximising use of the land, and in so doing lay opposite existing buildings within the site that were extant at that time but subsequently demolished. The southern façade of the school has high-set windows typical of that period which permit light into the interior whilst being deliberately positioned to restrict pupils' views out.
- 3.9 As noted at paragraph 6.7 of the Heritage DBA, no specific associations or designed views were identified for the Grade II Listed school (see paragraph 2.5 above), and so in heritage terms the site does not contribute to the setting of the school. In conclusion, at the time of construction, the school was positioned in relation to existing boundaries and the road to efficiently use land that defined its then land holding without designed regard to aspect and view, and with no historic relationship between the school and the site, either when it had built development, or as an area of open farm land.
- 3.10 Current and historic mapping and aerial photography record the incremental enclosure of the site by residential developments to the north at the Old Bakehouse etc., to the east at The Pheasantry, to the west by Wychavon, and most recently (c.2003) to the south at Duke's Field as part of the redevelopment of an egg packing plant; this latter development completed the enclosure of the site and in so doing defined its current boundary, and in doing so removed mature trees and vegetation to the north of the egg packing plant. The housing developments to the east, south and west do not have designed connectivity with the site as they each present rear or side elevations; ground floor views are prevented by intervening boundaries that enclose those developments.
- 3.11 Since its original construction, the school has also been subject to ongoing development with additional buildings/classrooms to the north and a grassed play

space; the hard surfaced playground with netball court markings is retained to the south of the original school building.

- 3.12 Land to the east and north of the school has also been developed including the construction of the village 'hub' comprising village hall, village shop/post office, two tennis courts, community garden, children's play area, and MUGA. A vehicular access from Charlham Way (opposite the site) and generous car park is also provided. A surfaced pedestrian/cycle route extends north-eastward from the village hub to connect the village hub and school with Linden Lea and Broadleaze at the northern edge of the village without the need for car travel; a gate along the eastern boundary of the school allows pedestrian access from the village hub/car park.

#### Visual Relationship and Influences

- 3.13 Receptors that would experience the proposed 'key view' from the school toward the site are limited as the school and playground is not publicly accessible, being restricted to school staff, pupils, parents and authorised visitors.
- 3.14 A pedestrian access is now provided directly from the car park to the north and east of the school following the establishment of the village hub. Use of this pedestrian access directly from the village hub car park reduces the potential number of receptors that approach or leave the school via the southern playground, thus further reducing the potential number of receptors that would experience the proposed 'key view'.
- 3.15 The opportunity to gain views from the school's southern playground toward the site is also influenced by neighbouring land uses and intervening boundary walls and is interrupted by moving traffic and stationary vehicles on Charlham Way; views may only be gained from limited areas of the southern playground.
- 3.16 Wychavon, to the west of the site, lies opposite the southwest corner of the school grounds, thus shortening the length of school boundary opposite the site to c.15m, and narrowing the gap for direct south-facing views into the western portion of the site.
- 3.17 Oblique south-eastward views toward the site are controlled by the boundary hedge between the playground and No. 16 Down Ampney to the east, hedging between No. 16 and 17 and along the southern boundary of No.17, thus limiting the potential viewing area to the south west corner of the playground.

- 3.18 A layby lies along the northern carriageway of Charlham Way, extending beyond the school frontage to the east and west. All views from the playground to the site are therefore seen in the context of, and are interrupted or partly obscured by parked vehicles, looking between or over them (**Appendix 3: View from school towards site**).
- 3.19 The features of the site that are experienced in the limited views gained from the school playground are of an agricultural, grassed, field with mature trees (one of which is dead), and criss-crossed by overhead lines. These features are seen against the backdrop of houses and bungalows and varying boundary treatments that enclose it, and to which the eye is drawn. The site displays unremarkable inherent landscape beauty, historic importance or significance, is not recognised or designated for landscape quality or value, nor ecological or biodiversity interest. There is no evidence of any designed visual relationship between the school and the site, and those limited and incidental views that are gained lack distinctive features and are unremarkable in terms of visual or aesthetic quality.

#### Conclusions

- 3.20 No justification, technical analysis or criteria that identifies the distinctive features of the site, historic significance and/or interrelationship between the school and the site, or other merit of the particular significance of the view have been presented in the NHP. The reasoning as to why the proposed origin point for the 'key view' is not stated, i.e. why this particular location is significant or why it was selected.
- 3.21 Receptors that would experience the proposed 'key view' from the school toward the site are limited as the school and playground is not publicly accessible, being restricted to school staff, pupils, parents and authorised visitors.
- 3.22 A pedestrian access is now provided directly from the car park to the north and east of the school, reducing the potential number of receptors that approach or leave the school via the southern playground, thus further reducing the potential number of receptors that would experience the proposed 'key view'.
- 3.23 Reference to the site being a 'Green' is misleading as it comprises an unremarkable and undesignated private parcel of farmland surrounded by 20<sup>th</sup> century housing. Views from the school playground are limited by neighbouring development and boundary treatments to localised areas. Such views are drawn

to the housing that surrounds and encloses the site, rather than of the site itself, and are frequently viewed across a foreground of parked cars and road traffic that occupy the immediate foreground adjacent to the boundary of the playground.

- 3.24 In conclusion, the importance and value of the school playground and views gained by a limited number of receptors from it toward and of the site are unfounded and so there is no reasoned justification for the designation of a 'key view' or 'Notable Vista' from the school playground to the site and it should be removed from the NHP.

### **Draft NHP Policy LP2: Local Green Spaces**

#### **National Planning Policy Framework**

- 3.25 The National Planning Policy Framework (NPPF) aims to provide one concise document which sets out the Government's planning policies for England. The NPPF promotes a presumption in favour of sustainable development, which is defined as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*", providing it is in accordance with the relevant up-to-date Local Plan, as well as policies set out in the NPPF.
- 3.26 Section 8 of the NPPF, paragraphs 92 to 103, sets out guidance in relation to planning policies and decisions that should aim to achieve healthy, inclusive and safe places.
- 3.27 Paragraph 101 of the NPPF introduces Local Green Space (LGS) designation:
- "The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period."**
- 3.28 Paragraph 102 of the NPPF sets out three criteria that must all be met when designating LGS:

**"102. The Local Green Space designation should only be used where the green space is:**

(a) in reasonably close proximity to the community it serves;

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

(c) local in character and is not an extensive tract of land."

- 3.29 The site falls within the village and is surrounded by residential properties and the school and so criterion (a) is fulfilled.
- 3.30 With respect to criterion (c), the site does not form an extensive tract of land and so that part of the criterion is also fulfilled.
- 3.31 The character of the site and its features and particular significance as required by criterion (b) including local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife are described and assessed in Section 5: Landscape Character Appraisal below.

#### Cotswold District Local Plan

- 3.32 The Cotswold District Local Plan 2011 – 2031 was adopted in August 2018.
- 3.33 Section 10 of the Local Plan sets out policy relating to 'Built, Natural and Historic Environment (Policy EN1)'. Paragraph notes that the District is renowned for the exceptional quality of its natural, built and historic environment, and states:

**"...The "Cotswold character" is key to the area's sense of place, its local distinctiveness and the quality of life of residents and visitors. The value of these assets to the area is evident in providing a strong local identity, enhancing the overall quality of life and contributing to the area's economy. For the avoidance of doubt the assessment of "significant detrimental impact" includes a judgement on whether any adverse impacts of a proposal would significantly and demonstrably outweigh its benefits."**

- 3.34 Policy EN3 Local Green Spaces (LGS) identifies 12 areas that are designated in the Local Plan as LGS; the list does not include any area or areas within Down Ampney. Paragraph 10.3.2 states:



**"Local Green Spaces identified in Policy EN3 are the result of extensive work with local communities. The supporting evidence is available on the Council's website Evidence Paper: Local Green Spaces."**

3.35 Policy EN4 The Wider Natural and Historic Landscape states:

**"1. Development will be permitted where it does not have a significant detrimental impact on the natural and historic landscape (including the tranquillity of the countryside) of Cotswold District or neighbouring areas.**

**2. Proposals will take account of landscape and historic landscape character, visual quality and local distinctiveness. They will be expected to enhance, restore and better manage the natural and historic landscape, and any significant landscape features and elements, including key views, the setting of settlements, settlement patterns and heritage assets."**

3.36 Paragraph 10.4.11 states:

**"Some aspects of landscape quality, such as the tranquillity of an area, are difficult to define but important to protect as a key element of the character of the District. The PPG says that tranquil areas are those that are "relatively undisturbed by noise from human caused sources that undermine the intrinsic character of the area. Such areas are likely to be already valued for their tranquillity, including the ability to perceive and enjoy natural soundscape, and are quite likely to be seen as special for other reasons including their landscape. Lighting can also have major impacts on landscape quality, particularly in areas of "Dark Skies" where there currently is little artificial light pollution..." (Author's emphasis)**

3.37 Section 10.7 sets out policy EN7 Trees, Hedgerows and Woodlands:

**"1. Where such natural assets are likely to be affected, development will not be permitted that fails to conserve and enhance:**

- a. trees of high landscape, amenity, ecological or historical value;**
- b. veteran trees;**
- c. hedgerows of high landscape, amenity, ecological or historical value; and/or**
- d. woodland of high landscape, amenity, ecological or historical value.**

**2. Where trees, woodland or hedgerows are proposed to be removed as part of development, compensatory planting will be required.**



**3. Development proposals affected by (2) above should, where appropriate, have regard to the potential for new or extended woodland to assist in carbon storage and to be a potential local source of biomass or biofuel."**

3.38 Explanatory paragraph 10.7.3 states:

**"For the avoidance of doubt, clause (a) of part one of the policy includes trees protected by a Tree Preservation Order or located within a conservation area; clause (c) includes those meeting the criteria of "important hedgerow" in the Hedgerow Regulations; and clause (d) includes ancient semi-natural or ancient replanted woodland."**

3.39 Trees T1 – T7 identified within the Tree Survey are subject to TPO and so are subject to category 1(a) of Policy EN7. The proposed development fulfils the requirements of policy EN7 by establishing suitable protection zones around the trees during construction and operation, with one dead tree proposed to be removed and replaced subject to agreement of tree species with CDC. Where appropriate, further survey and necessary tree surgery is proposed for retained trees, with the objective of fulfilling policy EN7 requirement to conserve and enhance trees subject to TPO.

#### Down Ampney Neighbourhood Development Plan

3.40 The Regulation 14 Issue of the Down Ampney Neighbourhood Development Plan (the 'NHP') was published in December 2021.

3.41 The NHP notes that the site comprises Grade 3b Agricultural land (NHP Figure 3.3 Agricultural Land Classification), and so does not form 'best and most versatile land'.

3.42 Section 3.3 of the NHP notes that there are no nature conservation statutory protected sites in the parish, that the parish lies outside of the Cotswolds Area of Outstanding Natural Beauty (AONB), and that there are no Scheduled Monuments or other historic sites or undesignated heritage assets within the settlement boundary of the village.

3.43 Draft Policy LP2 states:

#### **"Policy LP2**

**The areas denoted on Figure 3.7 shall be denoted as Local Green Spaces.**

**Note should be made of the Policies under Housing and Design dealing with green infrastructure and the recommendations in Infrastructure – Community and Leisure.”**

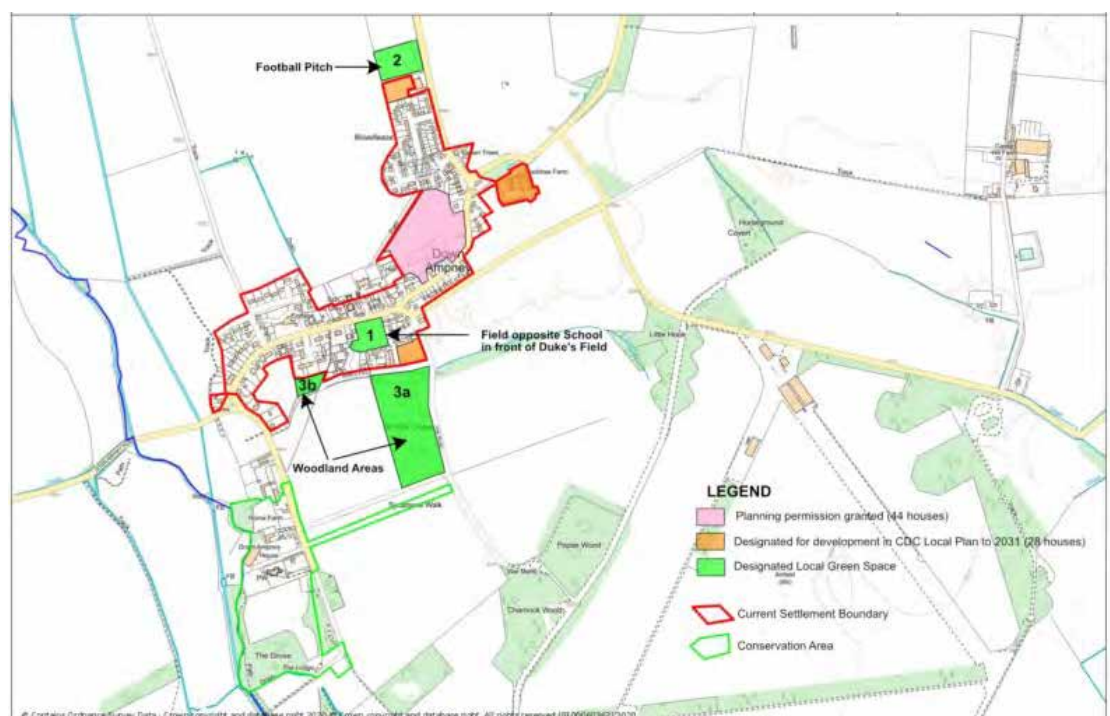
3.44 Responses to “Question 5 – Green Spaces”, where in this context green spaces do not comprise Local Green Spaces “as defined by the National Planning Policy Framework (NPPF), but general open areas within the village such as the field between the main street and Duke’s Field opposite the village school” is presented at sub section 3.4.2. It continues:

**“This field and two other areas should be designated as Local Green Spaces. These are indicated on Figure 3.7 overleaf.**

**Area 1 is the already-noted field opposite the village school between the main road and Duke’s Field. This field meets the criteria in paragraph 101 of the NPPF in that it is:**

- **in the very centre of the village;**
- **a special place to the local community as is demonstrated in the questionnaire because it is akin to a village green which is daily visible to all as a tranquil spot very often containing livestock gently grazing;**
- **approximately 6250 m<sup>2</sup> in size, not an extensive tract of land.”**

3.45 Neighbourhood Plan Figure 3.7 is reproduced below.



**Neighbourhood Plan - Figure 3.7 Local Green Spaces**

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### Discussion

- 3.46 An analysis of the landscape and visual context of the village and the site has been conducted in the preparation of this Landscape Statement, with reference to criteria that must all be met as set out in NPPF paragraph 102 (a), (b) and (c).
- 3.47 The site meets criteria at both paragraph 102 (a) is in reasonably close proximity to the community and (c) is not an extensive tract of land. However, to be worthy of designation as LGS it must also meet the requirements of 102 (b) demonstrably special to the community and holds a particular local significance for example because of its 'beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.'
- 3.48 As described at paragraph 3.17 above, the site displays unremarkable inherent landscape beauty, historic importance or significance, is not recognised or designated for landscape quality or value, nor ecological or biodiversity interest.
- 3.49 The site is in private ownership and is not publicly accessible; it therefore has no recreational value to the community.
- 3.50 With reference to NPPF paragraph 102 (b) and Cotswold Local Plan policy EN4 (1), the site is located within the settlement boundary of Down Ampney, surrounded on all sides by built development, to the south of Charlham Way which forms the principal vehicular route through the settlement. Further, it lies opposite the village school with on-road parking layby and vehicular access to the village hub comprising village hall, village shop/post office, two tennis courts, community garden, children's play area and multi-use games area (MUGA), and associated car park that serves the village hub. The site is therefore subject to noise and light disturbance from neighbouring properties, road traffic movements, and activities within the school and village hub including frequent vehicular movements and so cannot be considered 'tranquil', as defined by the nationally stated Planning Policy Guidance (PPG).
- 3.51 As described at paragraph 2.16 above, the site is not subject to any ecological or nature conservation designations. A Preliminary Ecological Appraisal accompanies the planning application, which identifies habitats that are of limited ecological interest and biodiversity; it lacks 'a richness of (its) wildlife.'

### Conclusions

3.52 In conclusion, the site fails to meet the stated criteria of NPPF paragraph 102 (b) required for LGS designation. It:

- Is unremarkable in terms of inherent natural beauty;
- Is recent in origin being enclosed and defined by neighbouring 20<sup>th</sup> Century developments and has no historic significance;
- Is in private ownership and so has no recreational value to the community;
- Is subject to disturbance from neighbouring developments and traffic and cannot be considered tranquil; and
- Possesses habitats of limited ecological interest and biodiversity.

3.53 The proposed designation of the site as Local Green Space should therefore be removed from the NHP.

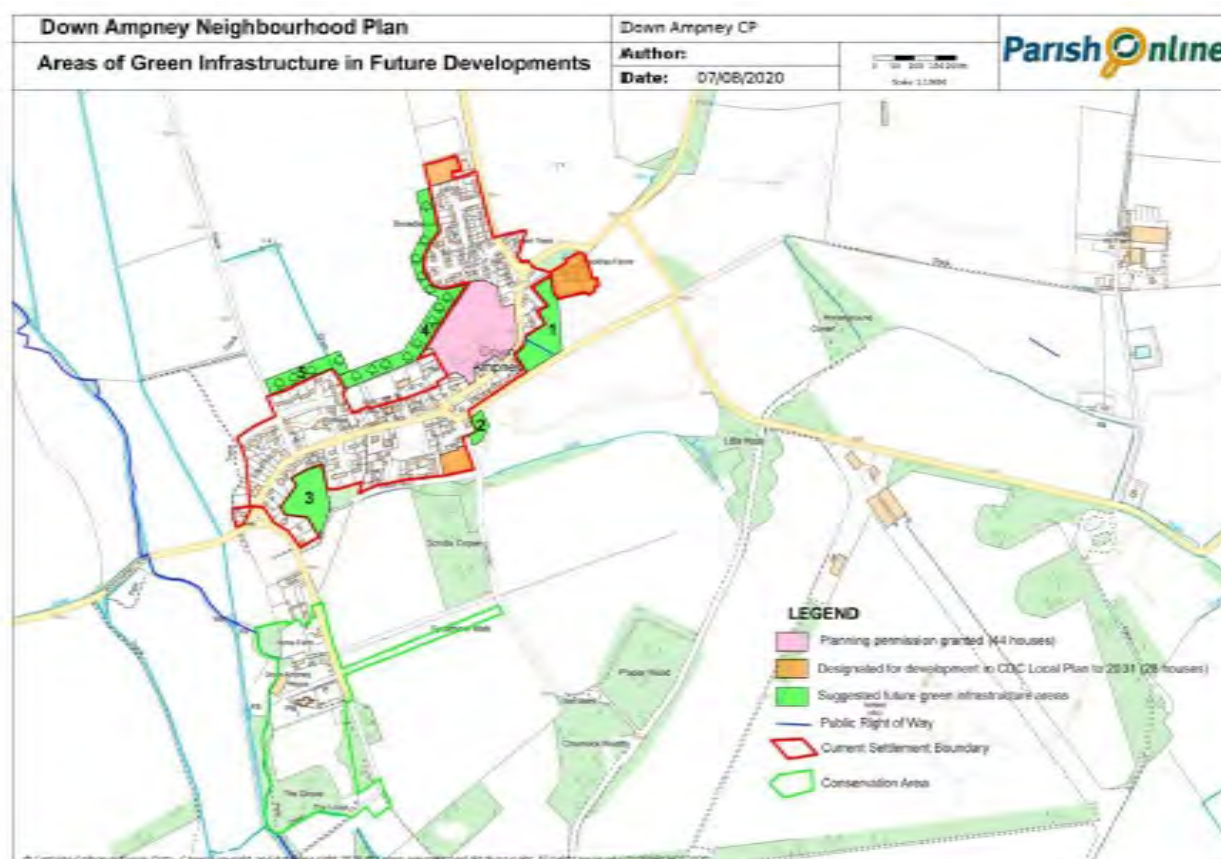
### Draft NHP Policy HP5: Green Infrastructure

3.54 Housing and Design is set out at Neighbourhood Plan Section 7, under the heading of Constraints on Development to Achieve Sustainable Growth at section 7.7, sub section 7.7.1 Green Infrastructure states:

**“Green infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as wildlife corridors, water purification, air quality, space for recreation and climate mitigation and adaptation.**

**Suggestions for areas that would be suitable for incorporation of green infrastructure into possible future development are shown on Figure 7.9 overleaf.”**

3.55 Neighbourhood Plan Figure 7.9 is reproduced below.



**Neighbourhood Plan - Figure 3.9 Possible green infrastructure in future developments**

3.56 Draft policy HP5 states:

**“Policy HP5**

**Green infrastructure shall be confirmed at development planning stage and shall not be amended after planning permission is granted.”**

3.57 Cotswold District Local Plan section 11.7 sets out Green Infrastructure and reiterates the NPPF definition of green (or blue) infrastructure. Paragraph 11.7.2 states:

**“The purpose of this policy is to ensure that individual assets and the integrity and connectivity of the Green Infrastructure network are planned, created, protected and enhanced, whilst recognising that the network extends beyond the District.”**

3.58 Policy INF7 Green Infrastructure seeks to ensure that development proposals make positive and proportionate contribution (either financially or through works undertaken) to green infrastructure (paragraphs 11.7.3 and 11.7.6).

3.59 The supporting explanatory paragraph 11.7.5 states:

**“Development proposals are required to protect as well as contribute to new and existing GI at a level that is proportionate to the scale, type and location of the development. For example it is unlikely that a contribution to GI would be required for the insertion of a dormer window, but a substantial level of GI would be expected as part of a major housing scheme. The key issue is that all GI should be considered together to ensure that they deliver multi-functional and networking benefits. This integrated approach is reflected through the Local Plan, for example GI is referred to in several policies including INF3, EN1, EN3, EN8 and S2.”**

3.60 In accordance with paragraph 11.7.5, the scale, nature, and location of development proposals therefore needs to be known along with the existing green infrastructure context before a proportionate level of green infrastructure that can deliver multi-functional and networking benefits can be established.

3.61 The selection of the proposed allocations is not set out or supported in the NHP with reasoned justification and/or technical analysis to provide a robust case as to the need for, location, nature or extent of possible green infrastructure parcels or the additional benefits that would be delivered over and above existing green infrastructure in and around Down Ampney.

3.62 Varied and high-quality recreational and amenity facilities are provided in the village hub comprising two tennis courts, children’s play area, multi-use games area, and community garden, all in proximity to the school playing field.

3.63 The village has a linear form and as such enjoys an extensive interface with neighbouring agricultural land, local and wider landscape features, and associated amenities including woodland, hedgerows, public rights of way, permissive paths, Ampney Brook, the River Thames, and the Cotswold Water Park. These features provide an extensive green infrastructure with existing recreational opportunities, ecological habitats and interconnected wildlife networks.

3.64 In this context, the need for the proposed possible green infrastructure parcels as set out in the NHP is, in landscape, recreational and biodiversity terms unfounded, arbitrary, and overly prescriptive; it is premature to identify such



features and would be overly constraining in relation to any development that would be necessary to enable its delivery.

### **Conclusions**

- 3.65 In conclusion, the need for such extensive areas of possible green infrastructure in the context of the village and its local and wider rural setting has not been adequately and transparently tested. The proposed allocation of land within the NHP for the purposes of green infrastructure delivery is premature and overly constraining in relation to any development that would be necessary to enable its delivery.



#### 4. PROPOSED DEVELOPMENT

- 4.1 An outline planning application is pending determination (CDC Ref: 21/04185/OUT) which seeks outline planning permission for the low-density development of 8no. dwellings, and associated infrastructure comprising a small pumping station, associated access and landscape (green infrastructure) areas. The proposed development is shown on the planning application drawings (presented at **Appendix 4: Planning Application Drawings**). The planning application Parameters Plan defines those zones within the site that would and would not be developed.
- 4.2 An Illustrative Block Plan and an Illustrative Masterplan have also been submitted, showing how the dwellings could be arranged within the spatial constraints of the Parameters Plan. The dwellings would be restricted to two storeys in height.
- 4.3 As the planning application is in outline, the layout, materials, design and appearance of the proposed development and green infrastructure would be subject to detailed design and agreement with Cotswold District Council. However, it is reasonable to assume that materials design and appearance would be in keeping with the architecture of the village.
- 4.4 The existing Charlham Way field gate entrance would be widened to create a new surfaced vehicular and pedestrian access suitable for service and emergency vehicles; the length of the existing stone wall that would be removed to accommodate a wider access is to be minimised. It is envisaged that each property would have a garage and off-road parking space(s), and a small layby would be provided along the access road for visitor parking.
- 4.5 A dead sycamore tree (see **Tree Survey** that accompanies the planning application, reference T3) that lies immediately to the southwest of the field gate would be removed in the interest of safety and to create the residential access; a replacement tree of a size and species to be agreed with CDC would be planted in the northwest corner of the site.
- 4.6 Each of the remaining mature trees (Tree Survey references T1, T2 – T7) along the northern and eastern edges of the site would be retained and protected throughout construction of the proposed development (see **Tree Survey** package that accompanies the planning application). The proposed dwellings would be set back from the northern boundary of the site to maintain a semi-private amenity

area around the retained northern boundary Sycamore trees (T1, T2 and T4) and mature Horse Chestnut tree (T5); this amenity area would be planted and managed to promote enhanced biodiversity. A mature Sycamore (T6) and mature Walnut tree (T7) along the eastern edge of the site would be retained and incorporated into residential gardens. Trees on neighbouring third-party land that overhand the site boundary would not be affected by the proposed development.

- 4.7 The semi-private amenity area would maintain a buffer approximately 13 to 30m wide between Charlham Way and the proposed low-density housing.

## 5. LANDSCAPE CHARACTER APPRAISAL

- 5.1 The site and proposed development lies within the built context of Down Ampney village, being surrounded on all sides by residential development and the school as described above at Section 2: Site Context.

### Existing Landscape Elements and Character

- 5.2 The existing landscape elements, features and character of the village are described below.

#### Topography/Landform

- 5.3 Down Ampney lies between a tributary of Ampney Brook c.430m west of the site, and a tributary of the River Thames c.2km east of the site. Land within the site lies at c.87m AOD; land in and around the village reflects the relatively flat landform influenced by the Ampney Brook and River Thames, varying between c.83m AOD and c. 89m AOD.

#### Boundaries, Vegetation and Enclosure

- 5.4 The highway land of Charlham Way is broadly uniform for much of its length, with the two-way single carriageway flanked by footways; two short laybys occur, the first on the northern side of the carriageway adjacent to the school, and the second on the southern side adjacent to Cedar Close bungalows. Precast concrete kerbs prevail with occasional runs of granite setts at dropped kerbs/vehicular accesses.
- 5.5 Coursed natural rubble stone and/or squared reconstituted stone walls define the highway boundary/gardens of neighbouring properties through the village, with short sections of tall, close-boarded timber fences. The heights of walls and finishes vary (i.e. copings to natural rubble stone walls comprise dressed stone flags, rubble stone Jack-and-Jill copings, or concrete haunch; copings to the reconstituted stone copings also include a castellated top course – see **Appendix 5: Enclosure and Boundary Treatments**), and reinforcement with native or ornamental and evergreen hedges occur. Pedestrian and vehicular gates vary with a variety of timber styles including picket, framed with panels, or bar and brace and a variety of metal styles including agricultural horizontal bar and gate, different ornate metal designs, and vertical hooped-top railings around the school (see **Appendix 5**).

- 5.6 Building lines along Charlham Way vary, with houses set back from the road with garden frontages of varying depths; only one property, Little Court, directly fronts onto the pavement. The school is also set back from the road with intervening land comprising hard surfacing with painted netball court markings. Overall, building frontages that flank Charlham Way address the road with exceptions including a property at the corner of Charlham Lane (side elevation), and properties off Castle Hill Farm lane where the rear elevations face Charlham Way.
- 5.7 The highway land is characteristically 'hard' with no street trees or grassed verges (other than around the village Cross) occurring. Trees, hedging and ornamental garden vegetation of flanking properties provides an intermittent 'softening' of the route, including mature and semi-mature trees within the site.
- 5.8 Down Ampney comprises a linear, ribbon development where the rhythm of enclosure and variety in the streetscene is established by the massing of properties, gardens and associated boundary treatments that line the route of Charlham Way. Enclosure along the majority of Charlham Way is therefore medium, with buildings, garden walls and trees/hedging restricting lateral views to the north and south to the relatively narrow gaps between houses or vegetation; locally occurring very tall hedges and trees create high enclosure in the vicinity of Hampton Cottage.
- 5.9 Vacant land east of No.4 Down Ampney/Charlham Way and farmland south of Rooktree Farm create localised openness allowing views out beyond the confines of the village. Land south of Broadleaze is currently open but has planning permission for residential development. The site forms a semi-open area enclosed by the rear or side elevations of neighbouring buildings which restrict wider lateral views from Charlham Way.

#### Massing and Scale

- 5.10 Built form within the village reflects the small domestic scale of predominantly residential land use. Properties comprise bungalows or two storey cottages and houses that are either semi-detached or detached with varying footprint sizes although all retain a human scale. Variation in mass and scale is limited to two three-storey properties (No.1 Charlham Way/The Red House and No. 20 Charlham Way/East House) and two terraces comprising no.2 – 4 Down Ampney/Charlham Way, and at the junction of Charlham Way and Down Ampney Road opposite the village Cross.

- 5.11 Community buildings, including the recently developed village hall, and extensions to the school are slightly larger in footprint which reflects their function, but they maintain a human scale. The original school house is similar in scale and mass to the older, contemporary cottages.

#### Movement and Grain

- 5.12 As noted above, the main form of the village is that of linear development flanking Charlham Way. This development, other than the school and village hall, is residential, with Rooktree Farm being the only other non-residential development.
- 5.13 Charlham Way follows a sinuous route, extending east from Down Ampney Road in a generally west-southwest to east-northeast direction through to Rooktree Farm. Long-established (pre-20<sup>th</sup> century) routes connect to Charlham Way, several of which are unnamed, they include the Church/Down Ampney House lane, and Oak Road to the south; and Charlham Lane and Poulton lane to the north. A further unnamed lane extends from Oak Road in an east-northeast direction toward Castle Hill Farm.
- 5.14 More recent roads (early 20<sup>th</sup> century to early 21<sup>st</sup> century) have been constructed to provide access to housing developments and include Chestnut Close, Suffolk Place, The Old Forge Estate Yard, Duke's Field, The Pheasantry, Linden Lea and Broadleaze. Each new road forms a cul-de-sac and so the principal movement and grain of the village remains east-west with secondary connectivity to the north and south; the cul-de-sacs are rectilinear or curvilinear in form.

#### Materials and Style

- 5.15 The style and materials of individual and groups of buildings reflect changing architectural periods (refer to **Appendix 6: Built Character** for photographs of examples).
- 5.16 Older late 17<sup>th</sup> century (e.g. Hampton Cottage) and mid-19<sup>th</sup> century Listed cottages are built with buff-coloured natural, coursed rubble stone with stone slate roofs, small roof gables, stone or timber lintels and stone mullions, with original white-painted iron lattice or iron glazing bar casements, and gabled porches with plank doors (e.g. No's. 42 and 43, and 51 and 52 Down Ampney/Charlham Way). The school also dates from this period and comprises

coursed and squared stone, stone slate roof with coped verges, and a gabled entrance door. No.20/East House is 2/3 storeys including 4 roof gables, built with coursed, squared stone with stone slate roof. The larger-scale former vicarage, the birthplace of Ralph Vaughan Williams (b.1872), is now divided into two separate houses and was built in 1865 of course rubble stone with flush quoins, stone slate roof with hipped dormers, octagonal bell tower, a canted bay and larger-scale white painted windows compared to the earlier or contemporary cottages and houses within the village.

- 5.17 Mid-20<sup>th</sup> to early 21<sup>st</sup>-century houses and bungalows are built from natural buff-coloured squared stone or reconstituted stone blocks. Roofing comprises dark brown clay tiles or pantiles with small and/or large gables, windows are formed with concrete lintels and have white-finished, large wooden or uPVC casements (occasionally with glazing bars), doors are timber or uPVC and often feature a glazed section and side panels. Houses frequently incorporate an integral or adjoining garage (e.g. Charlham House, Hollyfield House, houses at The Pheasantry). A series of individual detached, and semi-detached houses and bungalows lie to the east of the war memorial along the Castle Hill Farm lane, with rear gardens facing onto Charlham Way. Each of these properties displays a unique style, but use of reconstituted stone with clay tile roofs and white-finished windows prevail; one property has cream-painted render with slate roof, and several of the bungalows have roof conversions featuring extensive flat-roofed rear (north) facing dormers visible from Charlham Way.
- 5.18 At the eastern end of the village, recent detached and semi-detached houses off Linden Lea comprise buff-coloured, rough-faced reconstituted stone with squared quoins, and slate or clay tile roofs, some with gabled dormers, smaller double or triple white casements and gabled porches interpreting the architecture and style of the mid-19<sup>th</sup> century (and earlier) cottages within Down Ampney. Late 20<sup>th</sup>/Early 21<sup>st</sup> century semi-detached and terraced housing at Broadleaze contrasts sharply with the materials and styles elsewhere within the village and comprises buff or red brick with clay tiles and hung pent door canopies; casements are generally dark wood effect uPVC.
- 5.19 In terms of the character of the village, individual, historic (pre-20<sup>th</sup> century) buildings along Charlham Way within the village are of high architectural quality and are representative of the 'Cotswold vernacular' which is recognised through Listed building status. The historic buildings tend to be isolated or are clustered in

very small groups, with intervening land developed during later periods, occupied by buildings that whilst they include similar-coloured materials, display a less distinctive style, scale, features and detailing that cannot generally be considered representative of the 'Cotswold vernacular'. Overall, housing within the village displays mixed form that lacks coherence, and later developments dilute the distinctiveness, coherence and unity of the built environment within the spirit and meaning of the Cotswold District Local Plan's "Cotswold Character". However, the most recent developments in the village (Duke's Field and Linden Lea) have more sympathetically and closely re-interpreted the vernacular established by the pre-20<sup>th</sup> Century buildings.

#### Physical and Visual Connectivity

- 5.20 Physical connectivity between the site and neighbouring areas is limited to the agricultural access on Charlham Way; the site is in private ownership used for sheep grazing and so is not publicly accessible.

#### Appraisal of the Proposed Development

- 5.21 Topography and landform within the site would be largely retained by the proposed development, maintaining the relationship with neighbouring parcels. Wider topography beyond the site boundary would not be affected. The nature of effect resulting from the proposed development would be neutral.
- 5.22 There is a general continuity in roadside enclosure along Charlham Way comprising different types and heights of stone walling, although materials and details vary. The proposed development would retain the northern boundary wall with only minimal intervention, and so would be in keeping with the general pattern of highway enclosure through the village with neutral effect.
- 5.23 In terms of vegetation, one dead tree would be replaced as part of the proposed development; all other mature trees within the site would be retained and managed in accordance with good arboricultural practice to ensure their continued health and longevity. A swathe of land below and around the retained trees would be planted and managed to enhance biodiversity within the site, leading to a minor beneficial effect.
- 5.24 The proposed development would be limited to two storeys in height in keeping with the established scale and massing of existing village properties. The nature of effect resulting from the proposed development would be neutral.



- 5.25 The landscape appraisal has shown that incremental residential and community development within the village has occurred along and parallel to Charlham Way. Each development has reflected the architectural style and materials prevailing at the time of its construction and/or status/function (i.e. The Old Vicarage and Village Hall).
- 5.26 The planning application seeks outline permission for the proposed development of the site within the constraints of the Parameters Plan, and so detailed design including materials selection, would be subject to consultation and agreement with CDC. It is therefore reasonable to assume that the proposed development would be in keeping with the prevailing scale and massing of existing buildings, and that an appropriate and sympathetic palette of materials and detailing would be delivered. On that basis, the nature of effect arising from the proposed development would be no more than a neutral on the character of the village.
- 5.27 Cotswold District Council Local Plan 'Policy DS2: Development within Development Boundaries' states a presumption in principle to planning applications within defined development boundaries; the site is wholly within the development boundary of Down Ampney being enclosed on all sides by existing dwellings and the school.
- 5.28 Explanatory paragraphs 6.2.4 – 6.2.6 that relate to Policy DS2 and against which the proposed development should also be considered state:

**"6.2.4 Most of the Principal Settlements have Conservation Areas and historic buildings, while Cirencester in particular includes large areas covered by scheduled archaeological sites. These make important contributions towards the area's heritage, for which the Cotswolds are internationally renowned. Evidence shows that inappropriate development can cause irreparable damage to the sensitive historic environment. In some instances, this has resulted from poorly designed development while, in others, infilling of visually important spaces has harmed the traditional character of settlements. A settlement's historic, incremental pattern of development should not be materially harmed by incongruous, out-of-scale, or inappropriate development.**

**6.2.5 In order to meet future housing and employment needs in the most sustainable locations, some larger-scale developments will have to take place. In such cases, direct impact on designated heritage and/or landscape assets should be minimised as far as possible. Good design principles will be important in helping to ensure that new development assimilates well with existing settlements.**

**6.2.6 Open spaces, gardens, gaps, 'green wedges' and 'green corridors' all make important contributions to the built environment. They can provide settings for buildings, variety in the street scene, vistas, and buffers between developed areas. Cotswold settlements derive much of their character from open spaces within the built-up area and it is important that they are protected from inappropriate development."**

- 5.29 With regard to Local Plan paragraph 6.2.4, neither the extent of the village that forms the context of the proposed development nor the site comprise a sensitive historic environment, with the Down Ampney Conservation Area lying physically and visually distanced to the south-southwest. The Heritage DBA has studied the setting of nearby Listed buildings, including the school and numbers 16 and 17 Down Ampney, and concludes that the site does not comprise the setting of those buildings; there would not be any adverse heritage effects arising from the proposed development in accordance with the Parameters Plan.
- 5.30 The landscape character appraisal notes that housing within the village displays mixed form that lacks coherence, and that later developments dilute the distinctiveness, coherence and unity of the built environment within the spirit and meaning of the Cotswold District Local Plan's "Cotswold Character". Further, both the Heritage DBA and this Landscape Statement demonstrate that the site is not visually important space either historically or currently. The proposed development would not be incongruous, out-of-scale or inappropriate; it would be low density and in keeping with the prevailing nature, scale, massing, density and form of the village context and so would be in accordance with the objectives of paragraph 6.2.4.
- 5.31 With regard to paragraph 6.2.5, no designated heritage and/or landscape assets occur within or immediately adjacent to the site and so the proposed small-scale development would not lead to any direct impacts. The layout of the proposed development would be in accordance with the submitted Parameters Plan with layout and detailed design to be agreed with Cotswold District Council. An Illustrative Masterplan, submitted with the planning application, demonstrates by means of good design principles that the proposed development can be successfully and sympathetically assimilated into the settlement in accordance with paragraph 6.2.5.
- 5.32 The site is completely enclosed by neighbouring developments and so does not form a green wedge' or 'green corridor' within the meaning of paragraph 6.2.6 or

in accepted planning terms whereby green wedges are defined by the government's Planning Portal as *'open areas around and between parts of settlements, which maintain the distinction between the countryside and built-up areas, prevent coalescence (merging) of adjacent places and can also provide recreational opportunities.'*

- 5.33 The site does not form a buffer between developed areas and/or the countryside, being fully surrounded by housing and the school and it is not required to prevent coalescence of Down Ampney with nearby settlements.
- 5.34 As previously demonstrated by the Heritage DBA, the landscape character appraisal and the Preliminary Ecological Assessment, the site does not form the setting for neighbouring buildings, has no designed function, no established relationship with surrounding land uses, is not publicly accessible, and is of low ecological interest. The site could be considered an incidental open space, but it is one of recent origin being defined and demarcated by enclosing late 20<sup>th</sup> century/early 21<sup>st</sup> century development on neighbouring land. It is an area of remnant grazing land that has historically been developed.
- 5.35 Down Ampney comprises a linear, ribbon development where the rhythm of enclosure and variety in the streetscene is established by the massing of properties, gardens and associated boundary treatments that line the route of Charlham Way. This variety and rhythm would be maintained with the proposed development in place through retention of mature trees and a broad landscape buffer between the northern boundary of the proposed low-density houses and the road. As demonstrated, no vistas or focal points of interest have been recorded, with the rear or side facades of late 20<sup>th</sup>/early 21<sup>st</sup> century housing to the east, south, and west of the site drawing the viewer's eye when seen from the Charlham Way to the north. The proposed low-density housing would be set back from the road and would be in keeping with and wholly appropriate in this location in accordance with paragraph 6.2.6.

## 6. SUMMARY AND CONCLUSIONS

- 6.1 This Landscape Statement presents a landscape and visual analysis prepared on behalf of the Co-operative Group relating to the draft Down Ampney Neighbourhood Development Plan (December 2021, Regulation 14 Issue) prepared by Down Ampney Parish Council Steering Group.
- 6.2 The purpose of Landscape Statement is to inform the consultation process regarding landscape and visual sensitivities of land to the south of Charlham Way ('the site') that is the subject of a pending planning application, in relation to proposals within the NHP for the proposed designation of:
- Policy LP1 (Figure 3.6) - A Notable Vista comprising the view from the school playground toward the site;
  - Policy LP2 (Figure 3.7) - The site as Local Green Space; and
  - Policy HP5 (Figure 7.9) - Green Infrastructure within the village of Down Ampney.
- 6.3 The analysis has reviewed the appropriateness of the proposed development with regard to the landscape and townscape character of the village context.
- 6.4 With regard to policy LP2, the proposed Neighbourhood Development Plan designation of Notable Vista 2: Green from the school playground, no evidence that identifies distinctive features of the site, historic significance and/or interrelationship between the school and the site, or other merit of the particular significance of the view have been presented in the Neighbourhood Development Plan. The reasoning as to why the proposed origin point for the 'key view' is not stated.
- 6.5 Reference to the site being a 'Green' is misleading as it comprises an unremarkable and undesignated parcel of private farmland surrounded by 20<sup>th</sup> century housing. Views from the school playground are limited by neighbouring development and boundary treatments to localised areas. Such views are drawn to the housing that surrounds and encloses the site, rather than of the site itself, and are frequently viewed across a foreground of parked cars and other vehicles that occupy the immediate foreground adjacent to the boundary of the playground.
- 6.6 The importance and value of the school playground and views from it toward and of the site are unfounded and so there is no reasoned justification for the

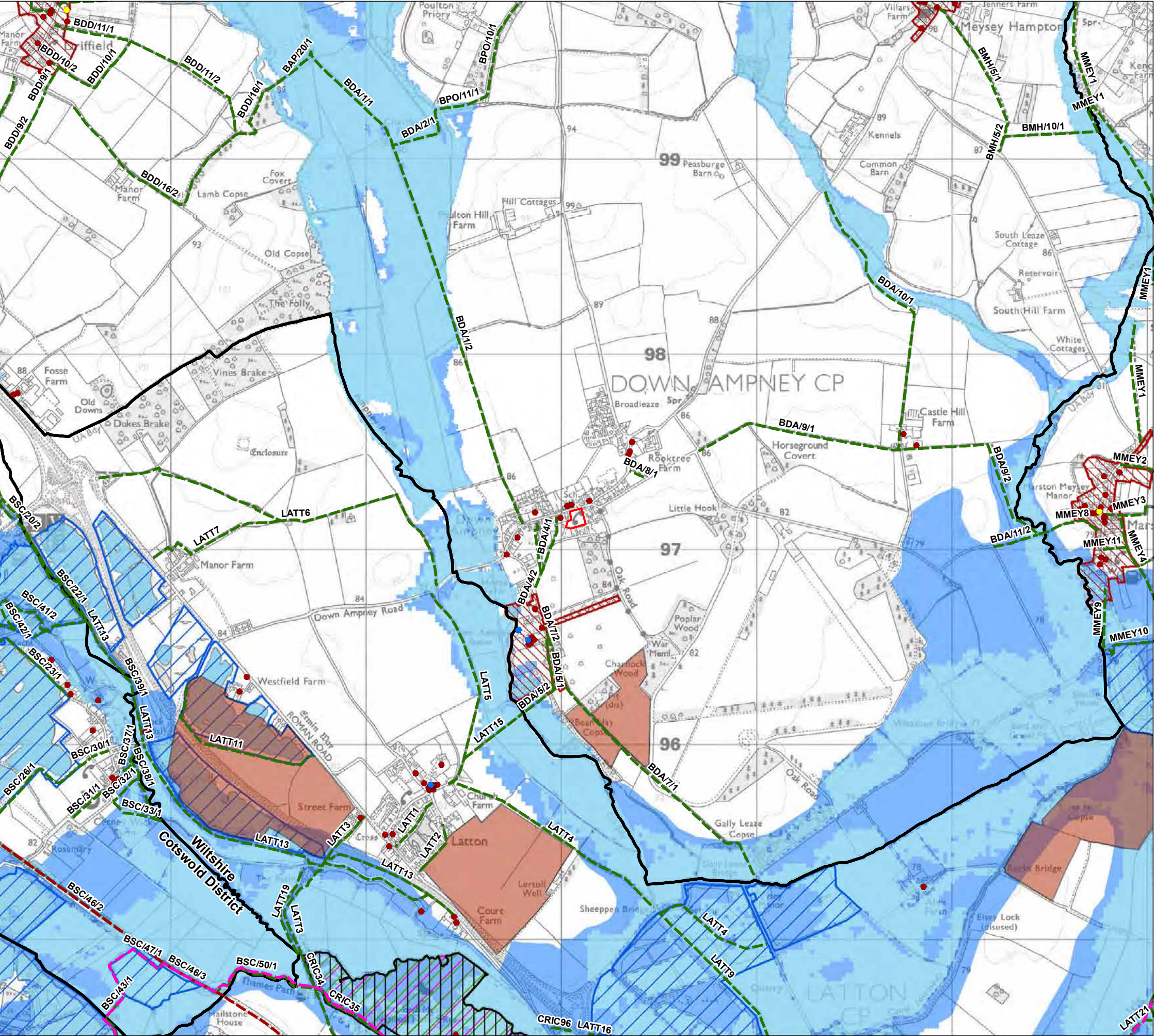
- designation of a 'Notable Vista' from the school playground to the site and so it should be removed from the Neighbourhood Development Plan.
- 6.7 With regard to the proposed Neighbourhood Development Plan policy LP3, designation of Local Green Space, prospective sites must meet all of the stated criteria of NPPF paragraph 102. The site meets 102 (a) and 102 (c) but fails to meet 102 (b) in terms of beauty, historic significance, recreational value, tranquillity and richness of wildlife and so cannot fulfil the requirements of NPPF paragraph 102. The proposed designation of the site as Local Green Space should therefore be removed from the Neighbourhood Development Plan.
- 6.8 The need for extensive areas of possible green infrastructure in the context of the village and its local and wider rural setting has not been adequately and transparently tested. The proposed allocation of land within the NHP for the purposes of green infrastructure delivery is premature and overly constraining in relation to any development that would be necessary to enable its delivery.
- 6.9 A landscape character appraisal has studied the existing features, elements and character that prevail within the village including topography/landform; boundaries, vegetation and enclosure; massing and scale; movement and grain; materials and style; and physical and visual connectivity with the site.
- 6.10 The nature of effect resulting from the proposed development with regard to topography/landform; boundaries, enclosure; massing and scale; movement and grain; materials and style; and physical and visual connectivity would be neutral. The nature of effect resulting from the proposed development with regard to vegetation (and biodiversity) would be minor beneficial.
- 6.11 Cotswold District Council Local Plan 'Policy DS2: Development within Development Boundaries' states a presumption in principle to planning applications within defined development boundaries; the site is wholly within the development boundary of Down Ampney being enclosed on all sides by existing dwellings and the school. The proposed low-density housing would be in keeping with and wholly appropriate in this location in accordance with paragraphs 6.2.4, 6.2.5 and 6.2.6 that relate to Policy DS2.
- 6.12 In conclusion, it is therefore considered that the proposed designation of the site as Local Green Space and the subject of a Notable Vista is unfounded and contrary to national policy. The landscape character appraisal has demonstrated

that the proposed low-density development would be appropriate in this location, in keeping with the characteristics of the village and Charlham Lane and would result in neutral or minor beneficial nature of effects.

## **APPENDIX 1**

### **ENVIRONMENTAL DESIGNATIONS PLAN**





KEY

Site Boundary

Grade I Listed Building

Grade II\* Listed Building

Grade II Listed Building

National Trail

SUSTRANS National Route

Public Right of Way

Local Authority Boundary

Open Access Land /  
Registered Common Land

Scheduled Monument

National Nature Reserve (NNR)

Special Area of Conservation (SAC)

Site of Special Scientific Interest (SSSI)

Conservation Area

EA Flood Zone 3

EA Flood Zone 2

Revisions:  
First Issue- 31/01/2022 AD

Environmental Designations Plan

Millennium Fields, Charlham Way,  
Down Ampney

Client: The Co-operative Group

DRWG No: **P21-2860\_01** Sheet No: - REV: -

Drawn by: AD Approved by: AS

Date: 31/01/2022

Scale: 1:20,000 @ A3

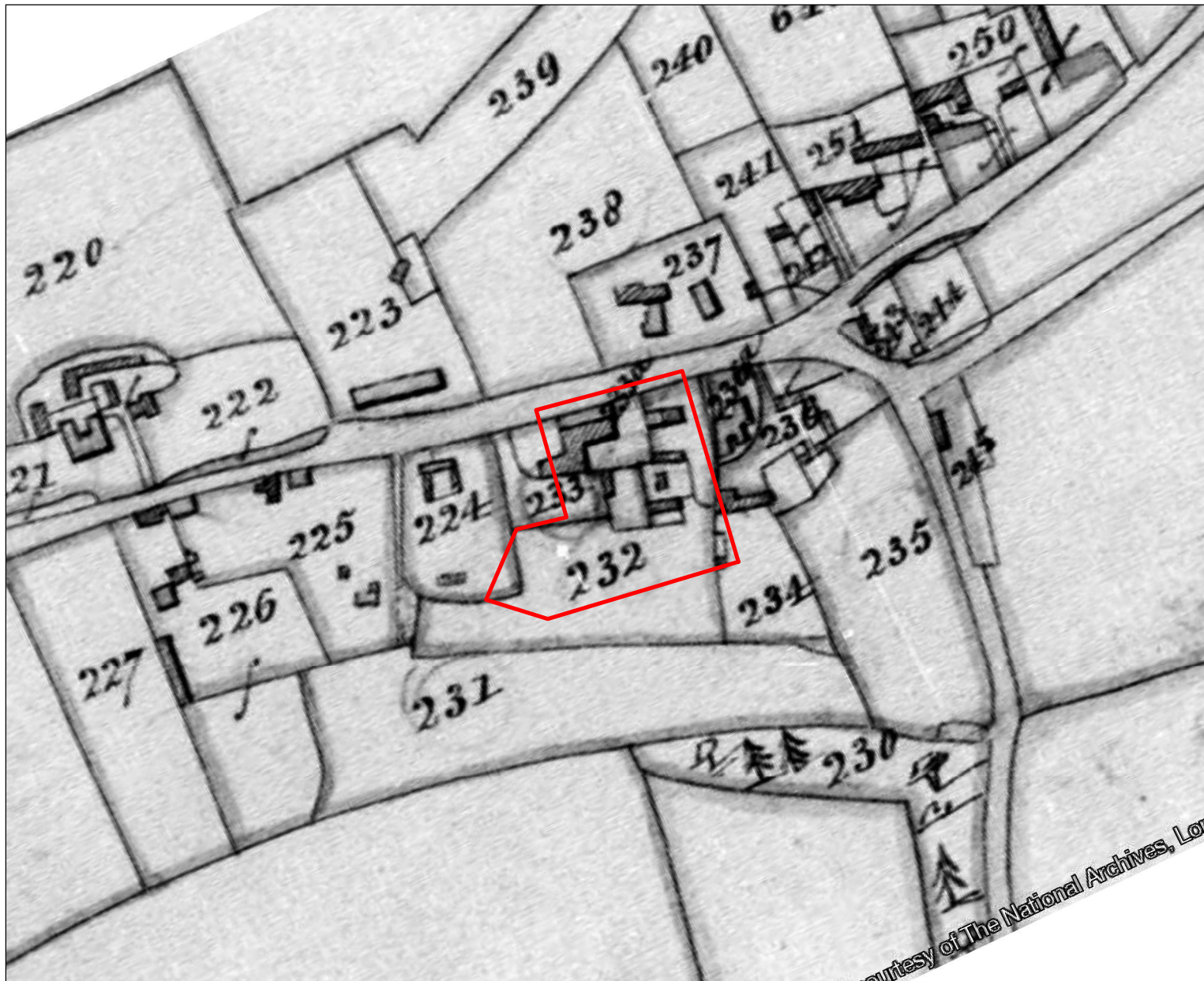
Pegasus  
Environment



**APPENDIX 2:**

**HISTORIC MAPS**

**(Abstract from Heritage DBA)**

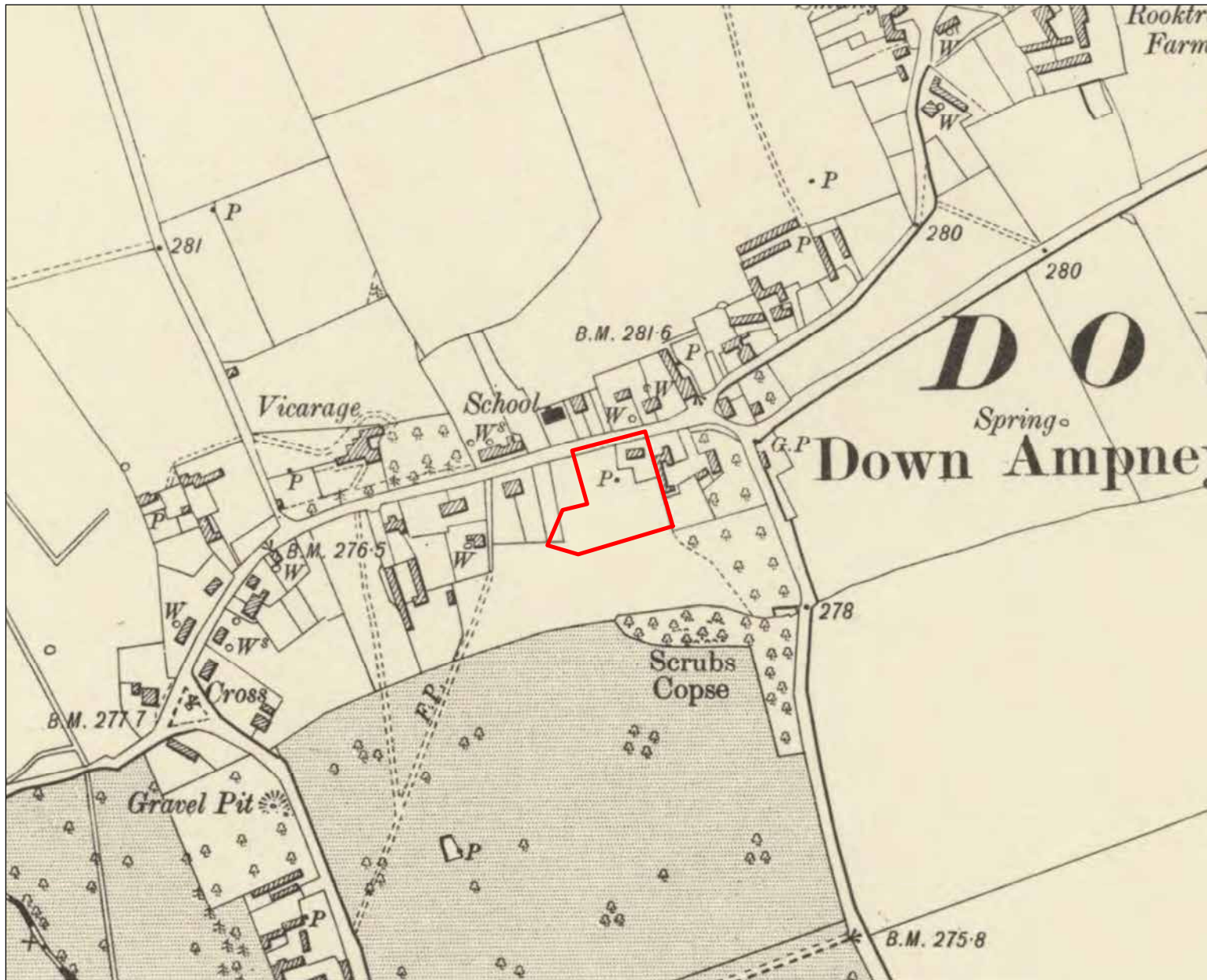


**KEY**  
 Site

Image courtesy of The Genealogist.

**Figure 4: 1843 Tithe Map**  
 Land South of Charlham Way,  
 Down Ampney

Client: The Co-operative Group  
 DRWG No: P21-2860 Sheet No: - REV: -  
 Drawn by: EP Approved by: GS  
 Date: 22/10/2021  
 Scale: 1:2,500 @ A4



# KEY

Site

**Figure 5: 1903 OS Map**

Land South of Charlham Way,  
Down Ampney

Client: The Co-operative Group

DRWG No: P21-2860 Sheet No: - REV: -

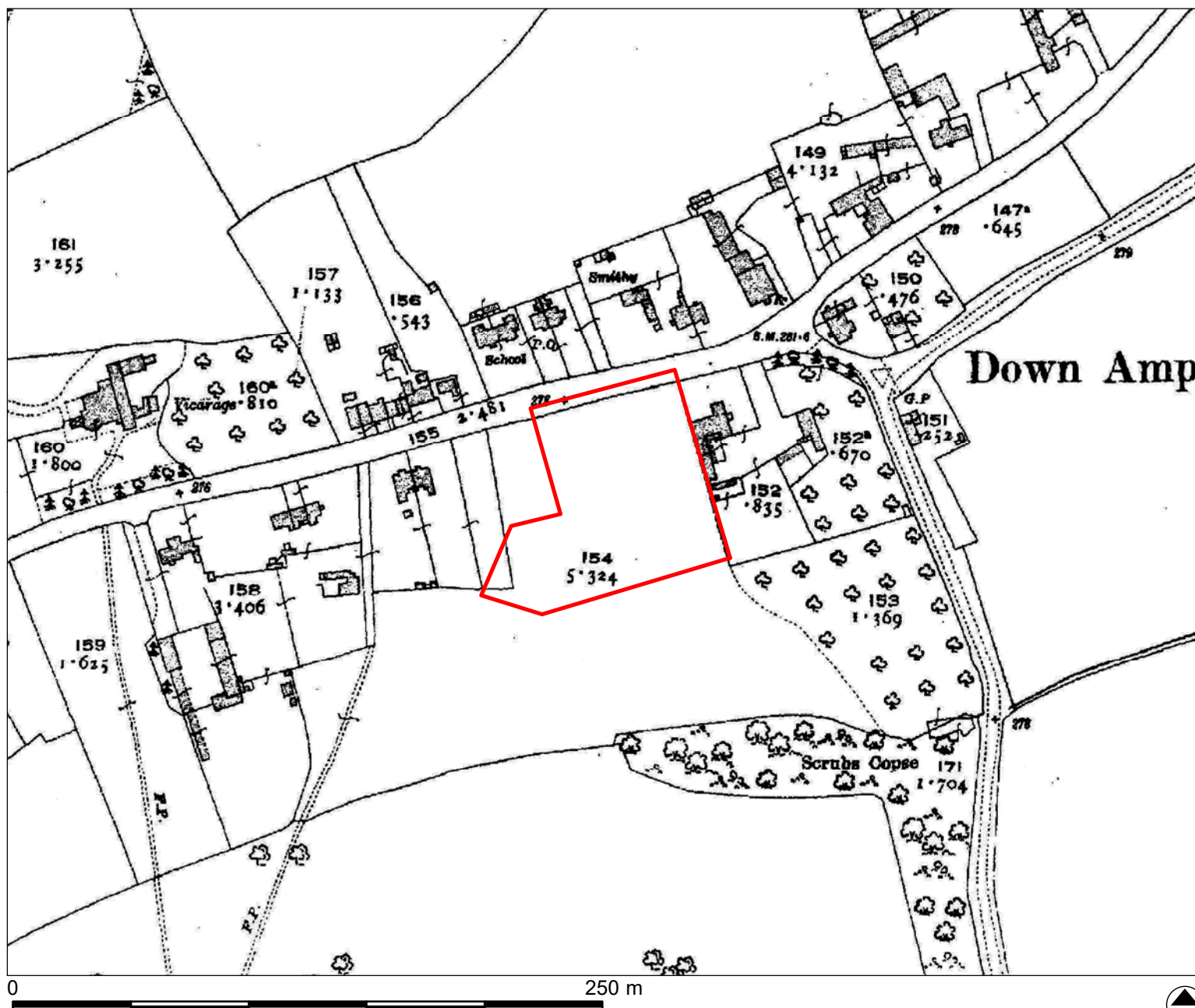
Drawn by: EP Approved by: GS

Date: 22/10/2021

Scale: 1:5,000 @ A4







## KEY

Site

Image courtesy of Promap.

## Figure 6: 1921 OS Map

Land South of Charlham Way,  
Down Ampney

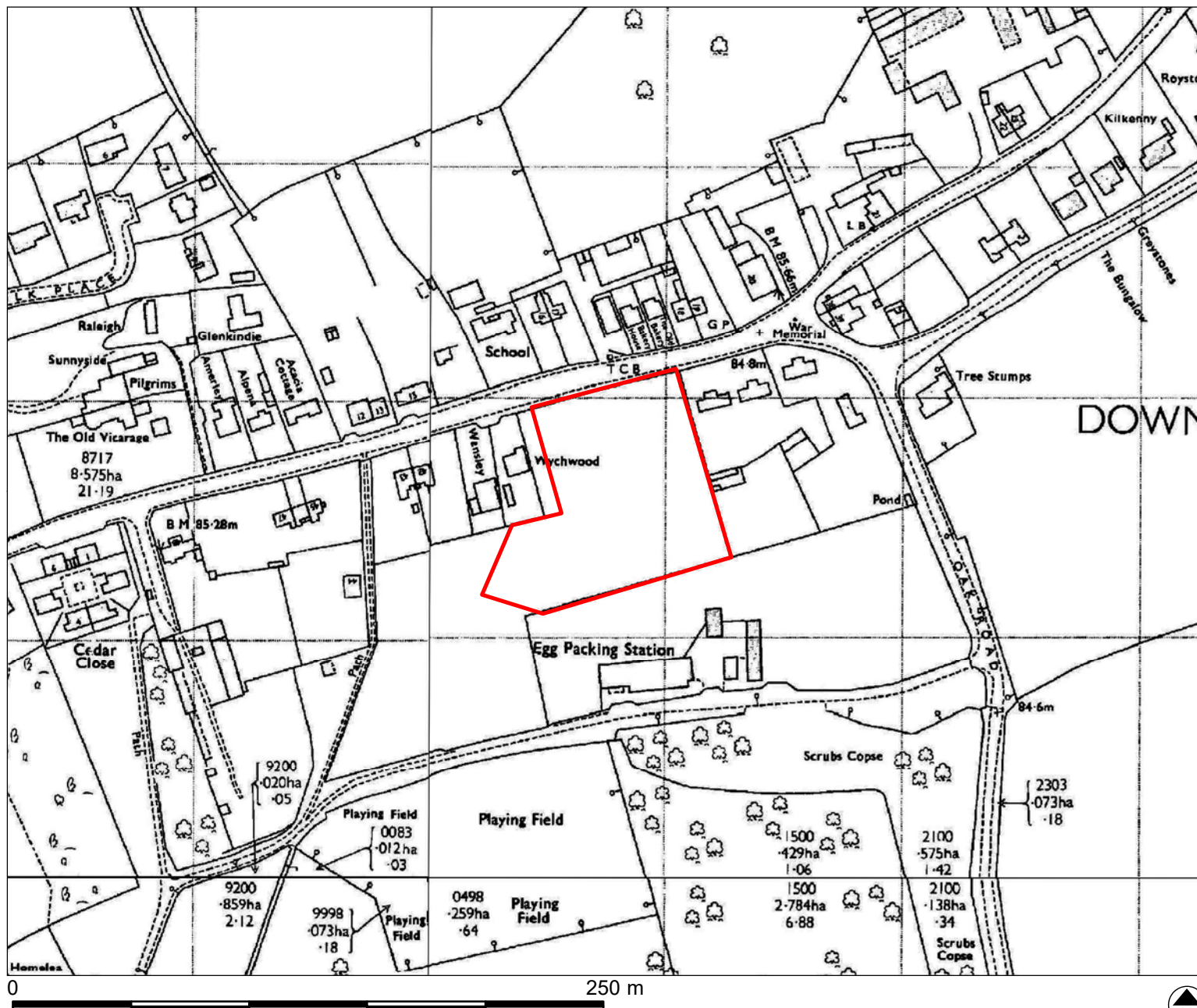
Client: The Co-operative Group

DRWG No: P21-2860 Sheet No: - REV: -

Drawn by: EP Approved by: GS

Date: 22/10/2021

Scale: 1:2,500 @ A4



## KEY

Site

Image courtesy of Promap.

## Figure 7: 1972-74 OS Map

Land South of Charlham Way,  
Down Ampney

Client: The Co-operative Group

DRWG No: P21-2860 Sheet No: - REV: -

Drawn by: EP Approved by: GS

Date: 22/10/2021

Scale: 1:2,500 @ A4

## **APPENDIX 3:**

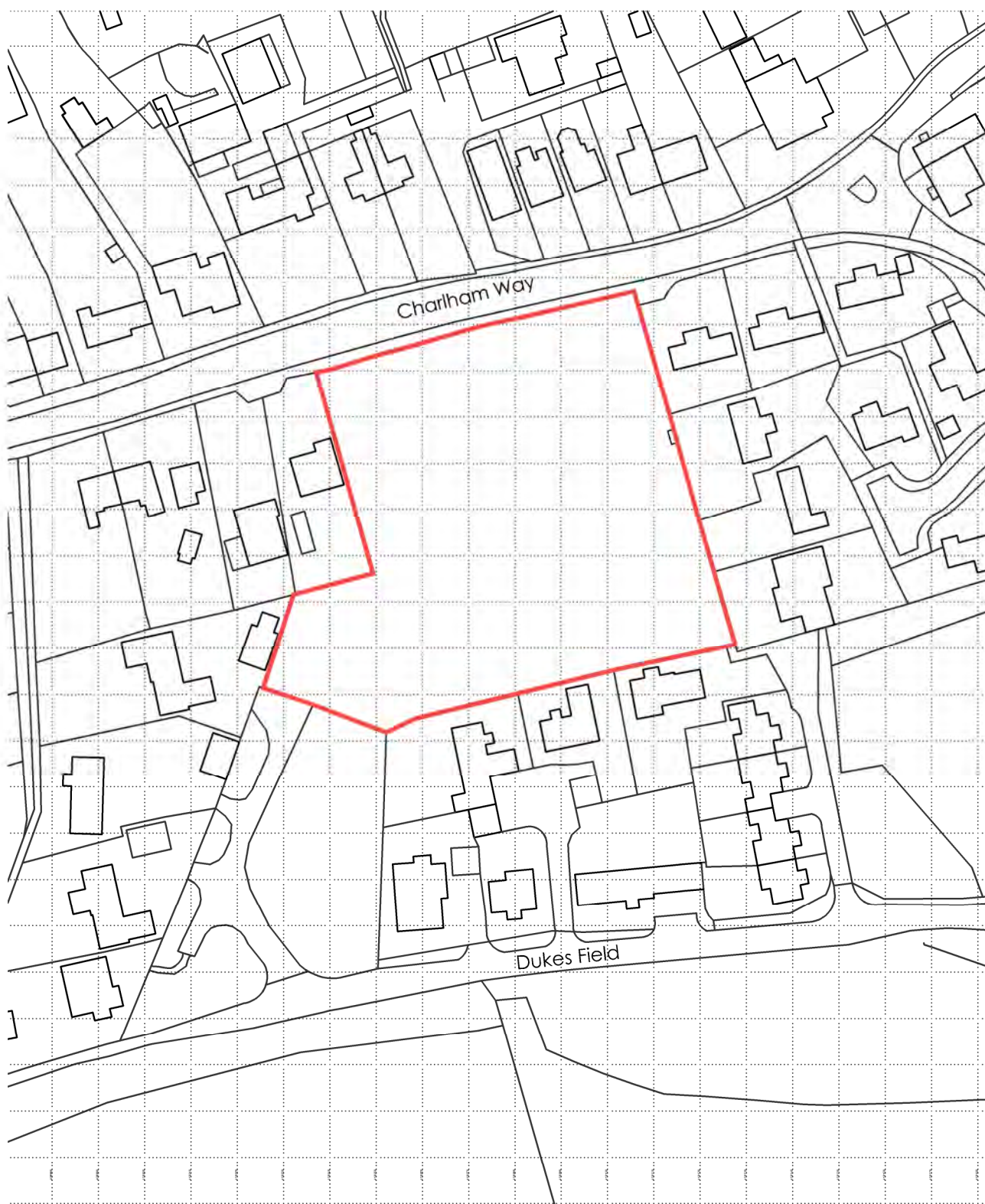
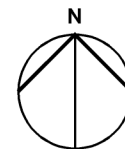
### **VIEW FROM SCHOOL LOOKING TOWARDS SITE**



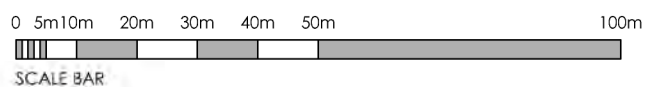


## **APPENDIX 4:**

### **PLANNING APPLICATION DRAWINGS**



Ordnance Survey, (c) Crown Copyright 2021. All rights reserved. Licence number 100022432



Date: 20.10.21

Checked by: CB

Sheet Name: Location Plan

Project No: 8617

Revision: P2

Drawn by: BB

Scale @ A4: 1:1250

Purpose of issue: Planning

Status:

Drawing No: 8617-BOW-A0-XX-DR-A-0001

Do not scale from this drawing  
This drawing is the copyright of Bowman Riley  
Architects Limited. ©

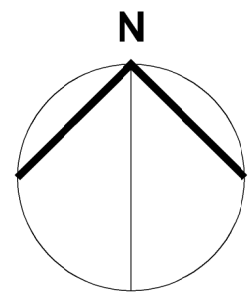
Co-op Property  
Land South of Charlham Way, Down Ampney



P2 Stone structure added 20.12.21 cb cb

Revision	Date	By	Chk





Site Information

Total Site Area: 1.50 Acres / 0.60 Hectares  
Total Developable Area: 1.20 Acres / 0.48 Hectares

Key

- Area to be Developed
- Area not to be Developed

P6	Development zone amended.	17.12.21	CB	CB
P5	Annotation amended.	17.12.21	CB	CB
P4	Existing bread oven added.	16.12.21	BB	CB
P3	Hedge and trees to southern boundary amended.	08.12.21	BB	CB
P2	Site boundary amended.	22.11.21	CB	CB
P1	Issued for planning.	20.10.21	BB	CB
Revision		Date	By	Chk

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.



Co-op Property  
Proposed Residential Development  
Land South of Charlham Way, Down Ampney  
Sheet Name:Parameters Plan

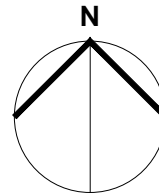
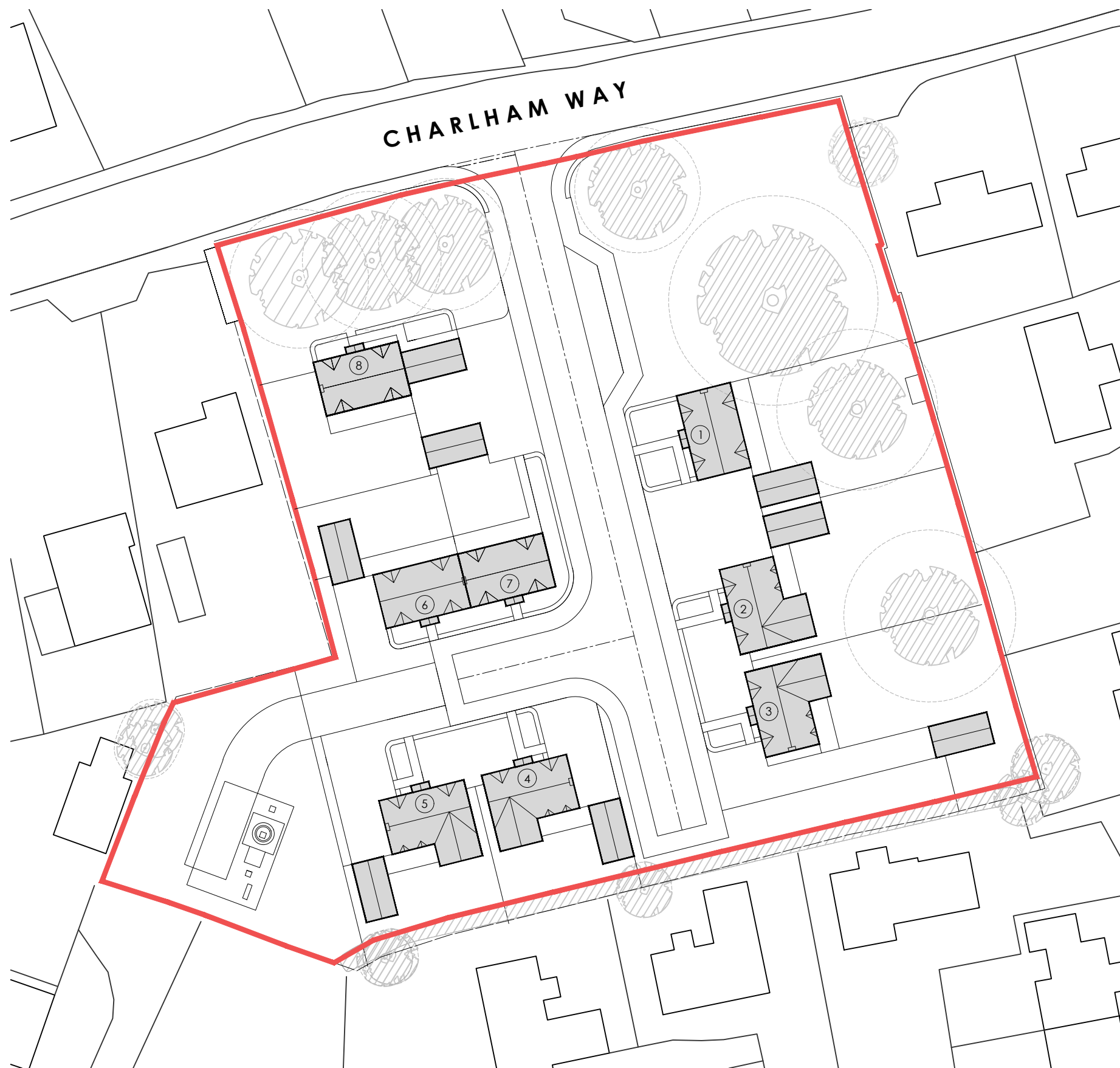
Purpose of issue:Planning  
Status:  
Date:20.10.21  
Checked by: CB  
Drawn by:BB  
Scale @ A1: 1:200  
Project No: 8617  
Revision: P6  
Drawing No: 8671-BOW-A0-XX-DR-A-0003



Parameters Plan  
Scale 1:200 @ A1

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**Illustrative Block Plan**  
Scale 1:500 @ A3

P4	Plot 8 set back from Tree T1.	12.01.22	CB	CB
P3	Existing stone structure added.	16.12.21	CB	CB
P2	Site boundary amended.	22.11.21	CB	CB
P1	Issued for planning.	20.10.21	BB	CB
Revision		Date	By	Chk

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.



Co-op Property  
Proposed Residential Development  
Land South of Charlham Way, Down Ampney

Sheet Name: Illustrative Block Plan

Purpose of issue: Planning Status:

Date: 20.10.21 Checked by : CB

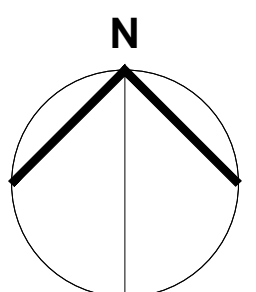
Drawn by: BB Scale @ A3 : 1:500

Project No: 8617 Revision: P4

Drawing No: 8617-BOW-A0-XX-DR-A-0002







Site Information

Total Site Area: 1.50 Acres / 0.60 Hectares  
Total Developable Area: 1.20 Acres / 0.48 Hectares

Key

- Existing Tree and Root Protection Area
- Proposed Tree and Root Protection Area (Indicative)
- Existing Hedgerow
- Proposed Hedgerow (Indicative)
- Proposed SuDS/Biodiversity Enhancement Zone (Indicative)
- Proposed 5.5m (w) Estate Road and 2m (w) Footpath
- Proposed 4.8m (w) Private Driveway

Accommodation Schedule

House Type	Area (m <sup>2</sup> )	Quantity	Area (m <sup>2</sup> )
1.5-2 storey/3 bed	97	4	388
1.5-2 storey/4 bed	118	4	471
Garages	17	8	137
<b>Total</b>		<b>8</b>	<b>996</b>

P7	Plot 8 set back from Tree T1.	12.01.22	BB	CB
P6	Hatching amended.	17.12.21	CB	CB
P5	Annotation amended.	17.12.21	CB	CB
P4	Existing bread oven added.	16.12.21	BB	CB
P3	Hedge and trees to southern boundary amended.	08.12.21	BB	CB
P2	Site boundary amended.	22.11.21	CB	CB
P1	Issued for planning.	20.10.21	BB	CB
Revision		Date	By	Chk

All dimensions to be verified on site, and the Architect informed of any discrepancy. All drawings and specifications should be read in conjunction with the Health and Safety Plan; all conflicts should be reported to the appointed Principal Designer.



Co-op Property  
Proposed Residential Development  
Land South of Charlham Way, Down Ampney  
Sheet Name: Illustrative Masterplan

Purpose of issue: Planning Status:   
Date: 20.10.21 Checked by: CB  
Drawn by: BB Scale @ A1: 1:200  
Project No: 8617 Revision: P7  
Drawing No: 8671-BOW-A0-XX-DR-A-0004



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## **APPENDIX 5:**

### **ENCLOSURE AND BOUNDARY TREATMENTS**



WALLING/FENCING



PEDESTRIAN GATES



VEHICULAR GATES





## **APPENDIX 6:**

### **BUILT CHARACTER**





5. No 51 and 52 Charlham Way



4. Charlham House



1. No.1 The Red House



2. New terrace adjacent to cross



3. Nos 2 to 4





6. Suffolk Place



10. Cedar Close



11. The Old Vicarage



7. Chestnut Close



8. Charlham Lane



9. No 49 Charlham Way



12. The Old Forge Estate Yard





16. No 42 and 43 Charlham Way



17. Wychwood adjacent to site



13. Alpena



18. School



14. Acacia Cottage



15. Long Acre



19. No 16 and 17 Charlham Way

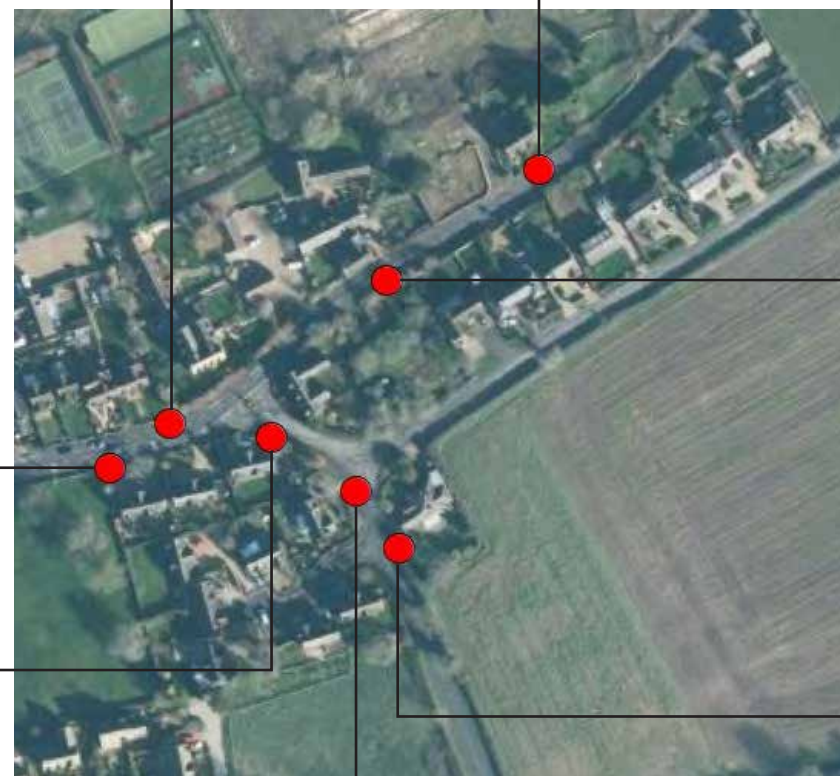




22. The Pheantry fronting Charlham Way



26. Backing onto Charlham Way



20. Old Bakery



24. Little Court



21. East House



25. Towards Kneelers Villa



23. The Pheantry, towards site





28. Broadleaze



27. Linden Lea



## **APPENDIX 2**

### **SITE LOCATION PLANS**



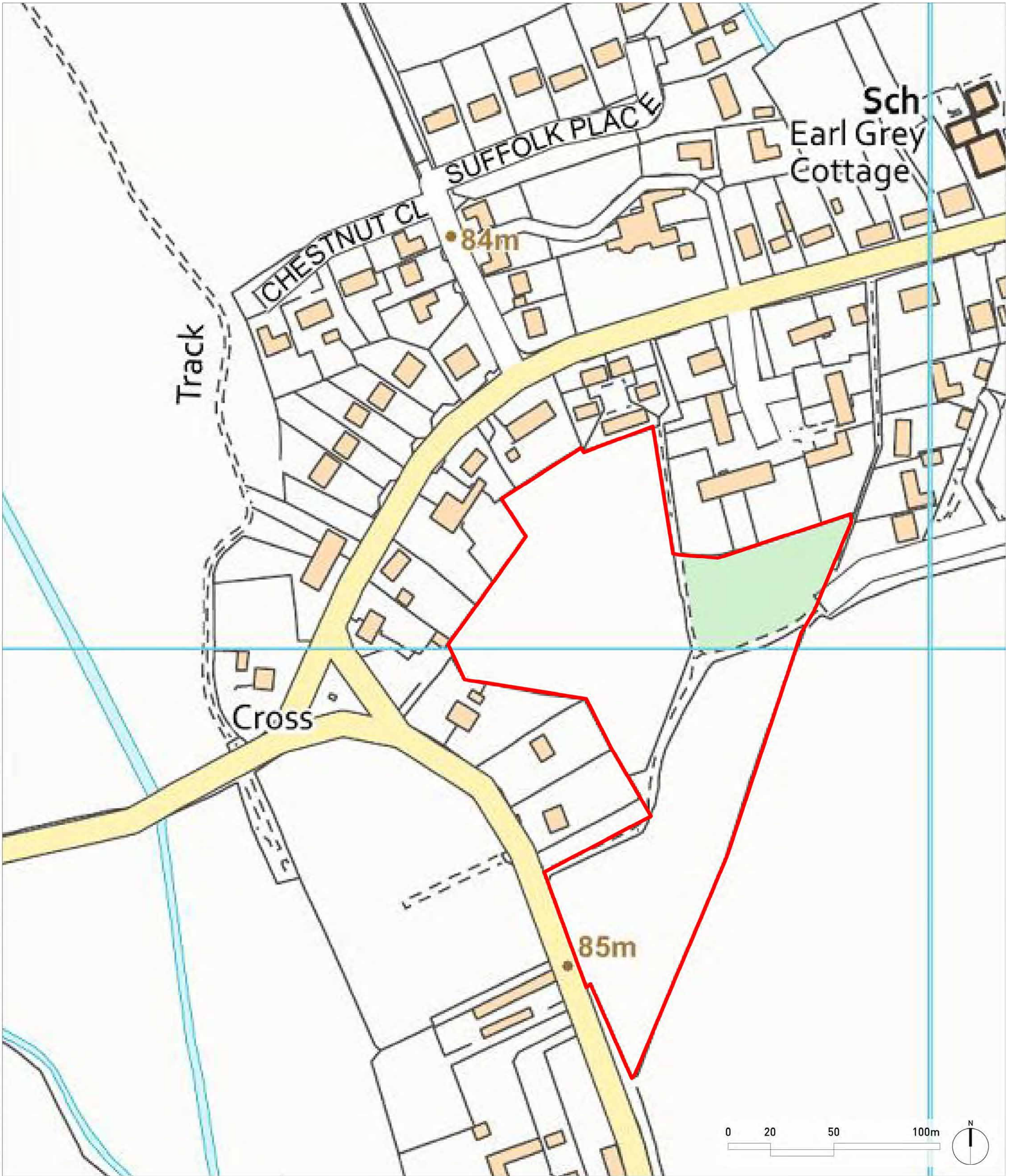


KEY: SITE LOCATION PLAN 10F3



SITE BOUNDARY [2.23HA]



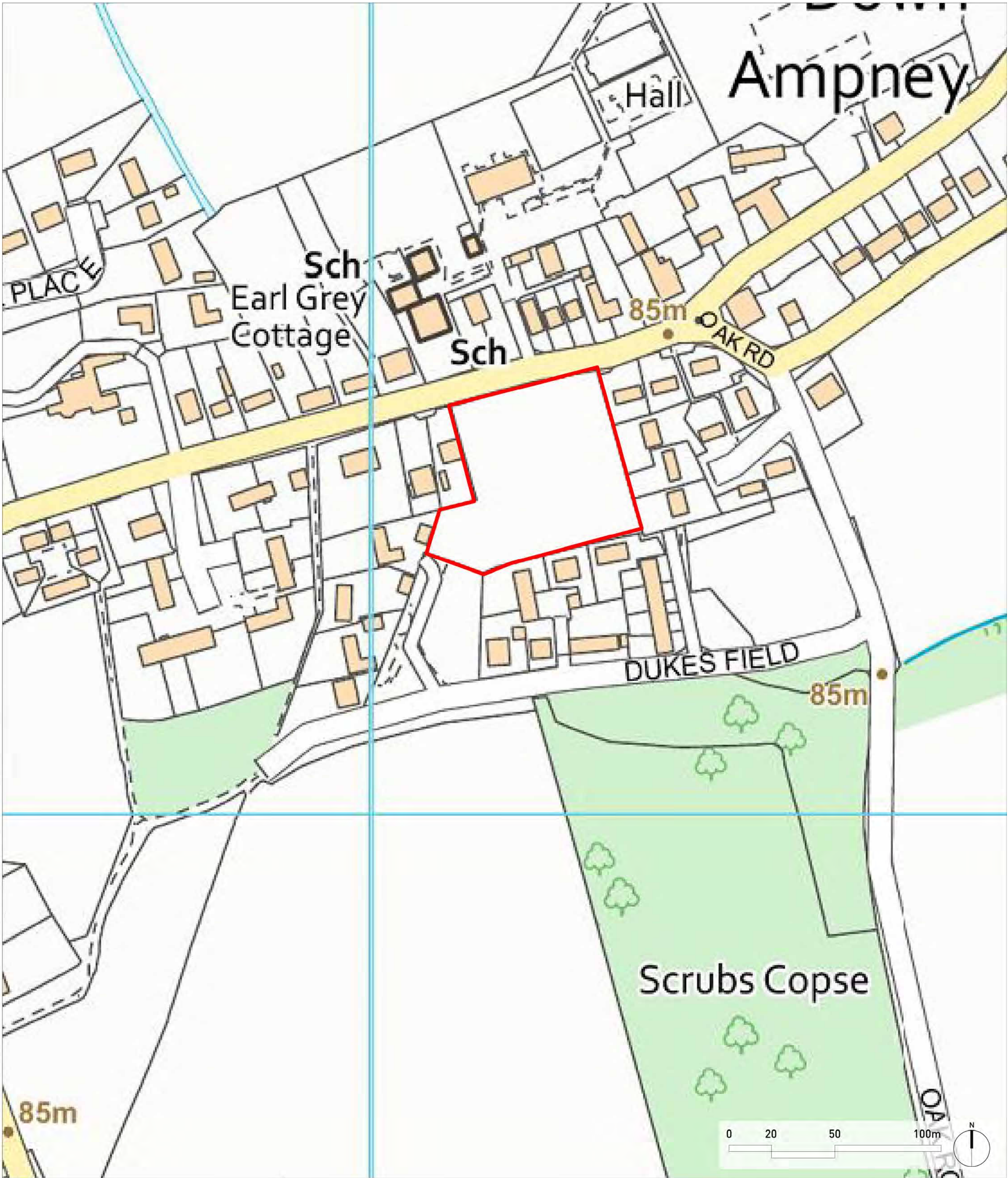


KEY: SITE LOCATION PLAN 20F3



SITE BOUNDARY [2.45HA]





KEY: SITE LOCATION PLAN 30F3



SITE BOUNDARY [0.643HA]