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[redacted]

30th April 2026

To: Braintree District Council
Causeway House,
Bocking End,
Braintree CM7 9HB

Ref: Revised application to barn conversions at Ferriers Farm

Dear Sir/Madam,

I am writing to submit a statement in support of the re-submission to overcome previous reasons for refusal, for the above proposal, following the Local Planning Authority's decision to refuse the application. I was the landscape consultant that prepared the original report, so have been involved in the project since 2021. I have not amended my previous report- instead I have summarised my response here, and include additional drawings appended to the end of this letter which respond to some of the landscape related comments made in the refusal notice.

I am a Chartered Landscape Architect and member of the Landscape Institute since 2006 (Mem.No. 16639). I have 20 years experience of working as a landscape professional in Suffolk and East Anglia in both multi-disciplinary private practice and, for the last 15 years, as a freelance consultant. I specialise in LVA and LVIA for all types of land use applications as well as character and sensitivity assessment at both district and parish level. I have specialised in landscape and sensitivity assessment to support Neighbourhood Plan groups in Suffolk, Norfolk, and Cambridgeshire in recent years.

In my opinion, the landscape-related conclusions reached in the refusal report do not reflect the evidence provided, or correctly interpret the true nature of the scheme. I consider the proposal is appropriate and policy-compliant in landscape terms and my responses are summarised below.

Braintree District Council's reasons for refusal relating to landscape are set out under two headings in the report. These are section '11.10 Landscape Impacts' and '11.11 Impact on the Stour Valley AONB Project Area'. It's not clear to me why impacts on landscape character have been separated into two sections as, to my mind, they are essential the same issue.

Firstly, I will summarise text from section 11.10 of the report which appears to support my findings. It states:

> 11.10.1 Policy. LPP, 67 of the adopted local plan seeks to ensure that development integrates into the local landscape.

> 11.10.2 A landscape appraisal (prepared by Lucy Batchelor-Wylam, dated May 2021) has been submitted as supporting information with the application which assesses the context of the proposed development on the landscape

11.10.3 The site is situated within the Stour Valley Character area, as defined in the landscape character assessment LCA (an evidence based report commissioned by the council in 2006). The LCA identifies this area is dominated in the north and west by arable farmland. A suggested landscape planning guideline includes considering the visual impact of new residential development and farm buildings on Valley slopes, maintaining cross Valley Views and characteristic views across and along the valley. The landscape appraisal includes a visual appraisal, which refers to publicly accessible viewpoints in the surrounding area towards the site. This includes views from the PRoW to the west of the site. The landscape appraisal concludes that 'the only public receptors that will experience any degree of change are footpaths users within the immediate environs of the site. They would be considered sensitive to visual change as they are engaged with the views and taking advantage of the amenity on offer on the footpath network, although the character of the buildings are being broadly retained, footpath users will perceive that the barns are no longer under agricultural use. Glimpses of window openings parked cars and other visual clues of human domestic activity will be sensed'.

11.10.4 A mitigation proposal is that a planted native hedgerow with trees will help screen visual effects of any human activity or vehicles and enhance biodiversity. The landscape appraisal concludes that, 'whilst the site has sensitivities, the proposal is sympathetic and sensitive to both the local character of the setting and that of the wider Stour Valley, the barns will continue life as residences, ensuring dilapidation and loss if avoided'.

11.10.5 Whilst the proposal has sought to largely retain the rural character of the barns, there will be evidence of their domesticated use from the wider setting, particularly from the public footpath. The landscaping proposed would screen the site to an extent. Officers therefore did not consider harm to the landscape setting to be detrimental to warrant refusal of the application. The proposal would therefore accord with policy LPP 67 of the adopted local plan.

This appears to show agreement with my findings that, whilst some visual impact will result on short range receptors- users of the footpaths in the vicinity - in general, the conversion of the barns, if accompanied by native hedging and tree planting, would not result in a harm that would warrant refusal on landscape grounds. Essentially, and importantly, the proposal is deemed acceptable in relation to policy LP67.

Next I turn to the text under heading 11.11 which goes on to deal with 'Impacts on the Stour Valley AONB Project Area'. This section starts by again making reference to Local Plan policy LP67, (a policy that is has just stated the proposal is compliant with). This text is lengthy so is provided in the appendix.

Section 11.11 appears, for the most part, to repeat general advice given by the AONB officer Beverley McClean. On reviewing this consultation submission directly (her email dated 11th August 2021) it can be seen to state: '***The AONB team broadly concur with the conclusions in the Landscape Appraisal submitted as part of the application about the extent of visual, landscape and residual impacts arising from the proposal. The Landscape Appraisal recognises the visual changes that walkers using the footpath passing south of the site will experience.'*** Ms McClean goes on to state' ***The materials palette being proposed for the barn conversions (facing brickwork, clay pantile roof coverings, black stained feather edge boarding and black fascia boards) are considered appropriate and in keeping with the rural built character locally.***

Whilst initially questioning the principle of development in the countryside, via compliance with LPP1, the tone of the response is generally neutral and accepting of findings and design response in this location. The response advises the council to secure the stated mitigation measures (relating to landscaping and to control of light) by condition to make the proposal acceptable. The response does not suggest the application should be refused and nor does it imply that light spill is likely to be unacceptable and cause harm to the landscape.

In contrast to the position of both myself and the AONB officer, the officer report concludes section 11.11 by taking a contrary approach;

> 'Officers, however, consider that the widening of windows, provision of roof lights as well as large glazed panels on each of the dwellings would have a cumulative light spillage into the rural countryside. While some of these may be required to meet with buildings and fire requirements, a significant portion of the glazing is excessive, in particular those facing outwards to the perimeter, given that the proposed buildings are on the slope, any light spillage would be highly visible. It is not considered that the design of the dwellings have minimized all possible unnecessary light spillage into the AONB Protected Area'.

I would like to deal with two issues in turn. First, the incorrectly referenced 'AONB Protected Area', and highlight the levels of policy protection afforded to different landscapes. Secondly to challenge the assertion that '*a significant portion of the glazing is excessive*'.

The reference in Paragraph 11.11 to the site being in the AONB 'Protected Area' needs clarity. The landscape here should not be considered a 'protected' landscape in that it does not have statutory protection in the way the Dedham Vale AONB/National Landscape does. The site is not in the AONB, only in the Stour valley 'Project Area'- which should be considered at the level of a 'Valued' landscape.

There are key differences between the legal status of a protected landscape and a 'valued' landscape. The Landscape Institute has published guidance (e.g., TGN 02/21: Assessing landscape value outside national designations) to help local planning authorities and inspectors assess landscape value. In short, it is an area defined as having sufficient landscape qualities to elevate it above other more 'everyday' landscapes, and is usually expected to backed up with an evidence base- often a landscape character assessment.

The 'Stour Valley Project Area' is defined by the Dedham Vale National Landscape and Stour Valley Partnership group who have aspirations for it to eventually be included as part of the AONB. Alison Farmer Associates has undertaken assessment work within the Stour Valley Project area to identify the qualities and scenic beauty indicators of the landscape, thus providing the evidence base needed to define the Project Area as a 'Valued' landscape.

The National Planning Policy Framework (NPPF) gives some additional weight to landscape protection in 'Valued' landscapes. It is dealt with under para 187 which states:

> 187. Planning policies and decisions should contribute to and enhance the natural and local environment by:
> a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
> b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; .....

Para 189 goes on to cover the approach to 'protected' landscapes. It states:

> 189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues.

So whilst some weight should be given to landscape protection in valued landscapes, 'great' weight is reserved for the AONB/National Landscape. The AONB Management Plan 2021-26 also deals with the Project Area in relation to planning. It states on page 17: *"It is anticipated that where planning permission is awarded in the Stour Valley project area it will not significantly impact those defined qualities of the area that make it important to residents and visitors."* I would state with confidence that this proposal will not significantly impact the defined qualities of the landscape. The visual impacts will be very limited, as identified in my report. The conversion of barns is an expected part of the rural scene in East Anglia and part of the traditional vernacular of the modern age, as long as conversion is sympathetic.

The conversion of the barns does not seem to be the main issue, however, comments seems to be directed at concerns relating to window size and light spill. The officers consider 'a significant portion of the glazing is excessive'. Studying the elevations I accept that there are large areas of glass on the internal elevations which focus inwards into the courtyards. The AONB Officer Ms McCLean notes this too but states, '*The design of the barn conversions is such that the larger areas of fenestration will generally open into proposed courtyards and not into the surrounding countryside or onto the neighbouring property (The Ferriers). This will help minimise light spill into the Project Area and help protect dark skies and the tranquillity of the area.'*

It seems reasonable then to focus on the external elevations that abut the farmland. On reviewing the images, it is my opinion that the amount of glazing is not excessive and has been limited to only that necessary. Particularly along the footpath, the glazing on Barn 3 adjacent to the footpath is very limited indeed. Looking carefully at the elevations and the floor plans, it is hard to see obvious places where windows could be removed as each bedroom or office has been allocated a single window. Removal of any of the windows here is not really feasible, otherwise rooms will be left windowless.

The Council appear to be of the opinion that removing '***all possible unnecessary light spillage into the AONB Protected Area'*** is necessary. In my view, it is not necessary but, nevertheless, two new measures are now incorporated to reduce light spill as a conciliatory measure.

- The double doors in Bedroom 2 of Barn 1 have been changed to a fixed window to avoid the amount of light that could potentially spill into the arable landscape from this opening.
- Some Brise-Soliel structures have been added externally, at the larger windows on barns 1 and 3, to help partially screen or filter some of the potential light spill.

Also;

- The courtyards of barns 1 and 2 had 1.8m high walls, with flint panels, to provide enclosure, but these were not clearly labelled on the original site plan. These will go a long way to containing any light spill from internal windows in barns 1 and 2.

For reference, the revised outer elevations are shown on the following 2 pages, colour-coded to make it clear which elevation is which. Please also refer to the Architect's drawings.

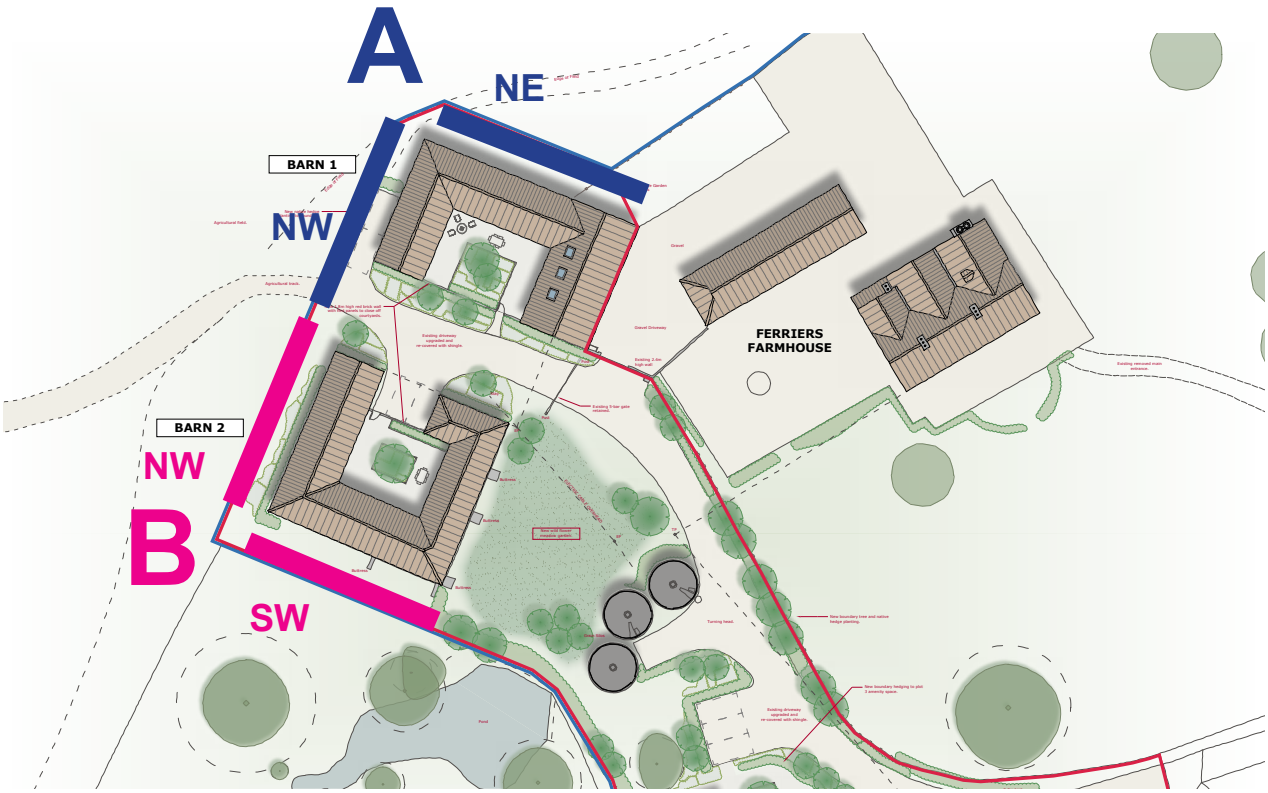
The provision of native hedging and trees as indicated on the site plan, secured by Planning Conditions, remains a good strategy to help the barns and yard assimilate into the landscape. Details can be provided in full at the next stage.

The proposed barn conversion represents the sustainable reuse of an existing rural structure, in alignment with national and local planning objectives that encourage the conservation of rural buildings and support the vitality of countryside communities. I therefore consider that the reasons for refusal are not justified when assessed against the full planning merits of the scheme.

For the reasons outlined above, I respectfully request that the Planning Inspector, on reviewing the evidence in full, should discount the landscape-related reasons for refusal.

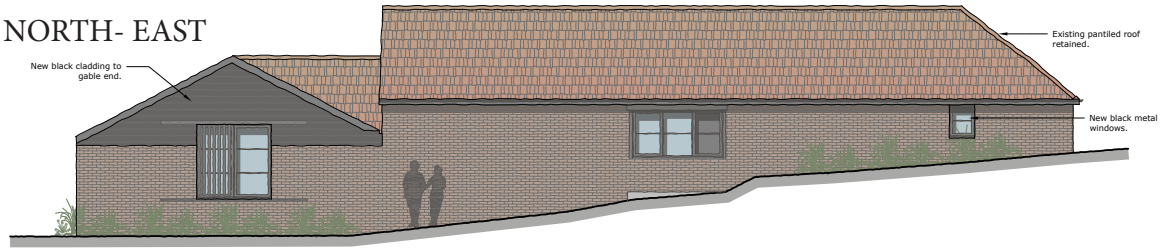
Thank you for your consideration. I remain available to provide any further clarification or information the Inspector may require.

Yours faithfully,
Lucy Batchelor-Wylam

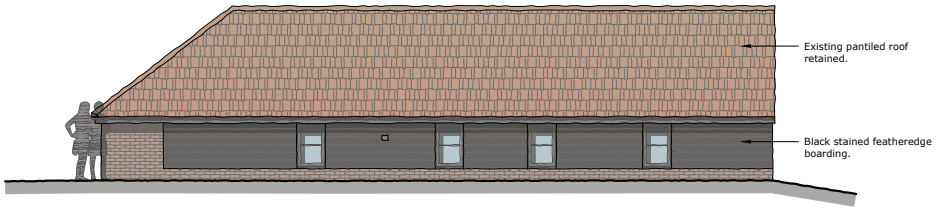


A

NORTH- EAST



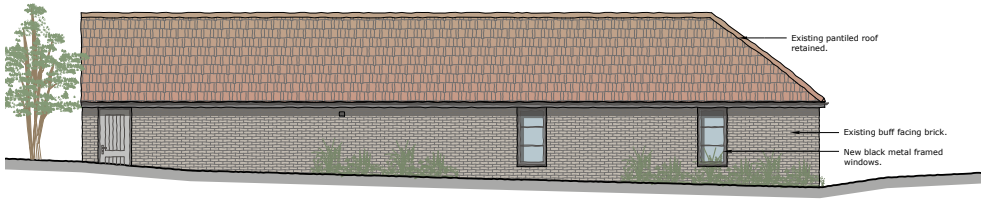
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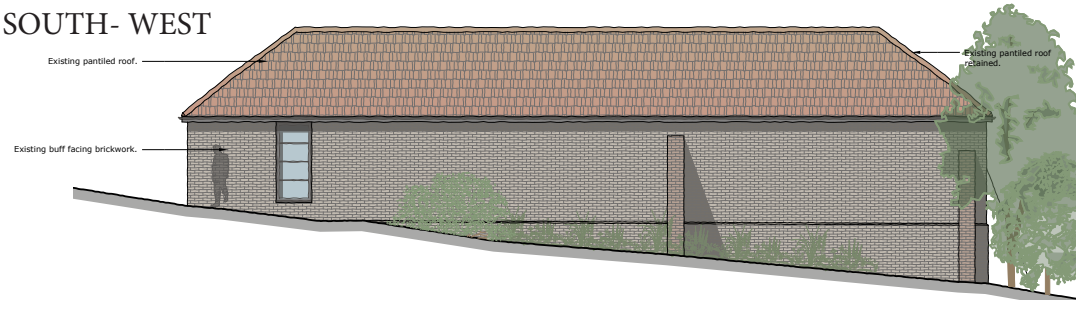
Elevations - updated February 2026

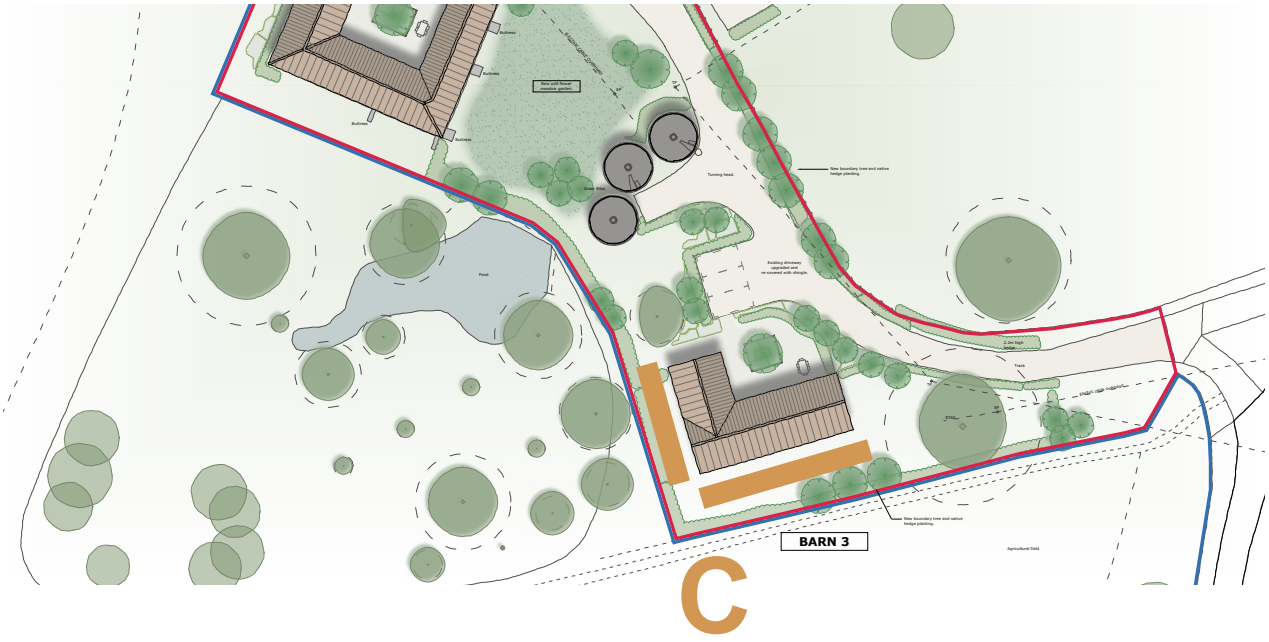
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NORTH- WEST

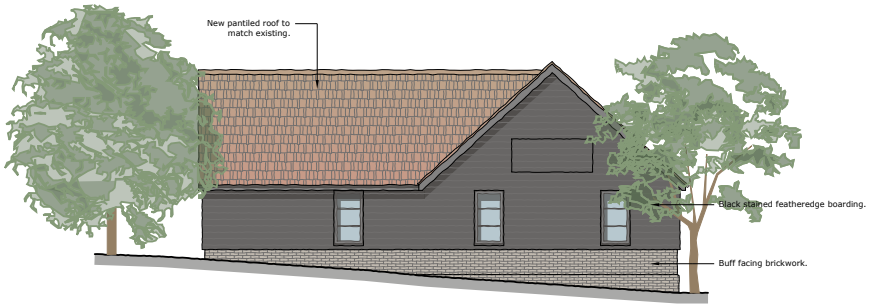


SOUTH- WEST





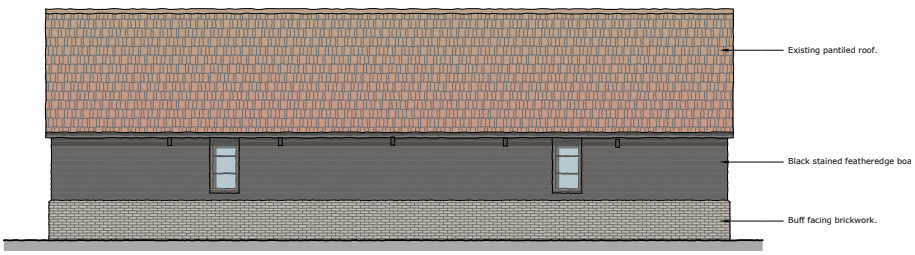
C



Proposed West Elevation
Scale 1:100



Proposed East Elevation
Scale 1:100



Proposed South Elevation
Scale 1:100

Elevations - updated February 2026