



The Planning Inspectorate

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Your Ref: P232851/F
Our Ref: APP/W1850/W/25/3360896

Mr M Tansley
Herefordshire Council
P O Box 230
Blueschool House
Blueschool Street
Hereford
HR1 2ZB

30 April 2025

Dear Mr M Tansley,

Town and Country Planning Act 1990
Appeal by Ms Caroline Gardner
Site Address: Aubreys, Mountain Road, Llanveynoe, LONGTOWN, Herefordshire,
HR2 0NJ

I enclose third party correspondence relating to the above appeal(s).

If you have any comments on the points raised, please send them to me no later than 14 May 2025.

You should comment solely on the representations enclosed with this letter.

You cannot introduce new material or put forward arguments that should have been included in your earlier full statement of case. If you do, your comments will not be accepted and will be returned to you.

Comments submitted after the above deadline will not be seen by the Inspector unless there are extraordinary circumstances for the late submission.

Yours sincerely,

Sean Ernsting
Sean Ernsting

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notice>

Where applicable, you can use the internet to submit documents, to see information and to check the progress of cases through the Planning Portal. The address of our search page is - www.planningportal.gov.uk/planning/appeals/online/search

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/W1850/W/25/3360896

DETAILS OF THE CASE

Appeal Reference APP/W1850/W/25/3360896

Appeal By MS CAROLINE GARDNER

Site Address
Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MRS JULIA BEGLEY

Address
Papillon Cottage
Llanveynoe, Longtown
HEREFORD
HR2 0NQ

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

Further to my previous representation to P223196/F on 8 Dec 2022 I would like to re-iterate my previous concerns:

- The size and scale of the proposed buildings are not in keeping with the original dwelling and will result in a substantial visual impact from the surrounding hills
- In particular the very large workshop/barn which is not part of the current footprint and is very large and tall and will have a considerable visual impact
- Policies LPCS RA5 and neighbourhood Plan LGPC 4 do NOT support rebuilding of derelict traditional buildings and Aubreys is completely derelict at this current time
- The cited similar applications are not in fact similar
 - o Neither 233737 or 240880 proposed building any new extensions or link-structures, they preserved the footprint, shape and character of the extant buildings.
 - o Neither case 233737 nor case 240880 are visible from a public highway or from footpaths and both are screened from view by mature trees.

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DETAILS OF THE CASE

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Appeal By MS CAROLINE GARDNER

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Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MISS CHRISTY CROUCH

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HR2 0LS

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

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YOUR COMMENTS ON THE CASE

Firstly I would like to make it clear that I object to this application. Having read the appellant's statement I have the following comments to make:-

I believe that the current proposal will cause harm because it is not in keeping with the local settlement pattern of small groups of buildings nestled together. The proposal requires buildings to be spaced across two fields - currently untouched pasture. The additions to the existing derelict buildings seem unjustifiably excessive in size. The buildings themselves will be very obvious from popular, if not iconic viewpoints above and across the valley. Having had a proposal myself slapped with numerous conditions because of the effect on a view from the same hills, it would be inconsistent to now allow something of this scale, impossible to hide or disguise, when mine was purely for a tennis court, virtually invisible from above.

I believe the appellant argues that this will contribute towards the Council's housing target requirements. Surely not. In what way will a large unaffordable dwelling tucked away on the side of a slope in the upper reaches of a pretty inaccessible valley contribute to local housing stock? It takes 15-20 minutes just to reach the village road, let alone the road itself. How is that helping housing stock locally, particularly when the owner lives in London? There is an argument locally against more high value executive housing which has been proven not to be needed in this area by the fact that many such houses which have come up for sale remain unsold, in some cases for years.

I understand that the appellant claims 2 other local planning applications - Case 233737 (Upper House Farm/ Holywell Cottage in Craswall) and 240880 (barn at Brook Farm, Longtown) - are similar to Aubreys and have been passed which should add weight to this appeal. I would beg to differ as follows:-

Aubreys, the current application site, is derelict and will require substantial rebuilding - I have been there myself - I know. This is contrary to LPCS RA5 and LGPC4 and 13. Both the Craswall property and barn at Brook Farm had walls that were capable of repair and renovation and so the proposals were not in conflict with these policies.

In addition, the current proposal requires extensions; roof height changes (larger not smaller) and links between buildings that would completely change the current appearance and character of what is there now - an historic site. Neither of the previously quoted cases required extensions or links and kept to the original footprint of what was there. The current proposal also includes a large garage building set apart and on its own. This is entirely out of keeping with anything in the valley at present and entirely unnecessary to the living accommodation in the house.

I would reiterate that this is a highly visible site in a popular tourist area and is completely out of keeping with the ancient and historic character of the valley. The other two properties were not visible from public viewpoints and were also hidden behind mature vegetation.

This is not the place for a modern monstrosity - it would be lovely to have Aubreys back up and lived in but in a style that blends and melds into this historic and traditional part of the world. This is not the place for a statement house. It is not suburbia. People come to this part of the world to escape all that. Respect for the environment would be appreciated.

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Appeal By MS CAROLINE GARDNER

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Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MRS CATHERINE DOWNIE

Address
Chapel Farm
Llanveynoe
Longtown Hereford
Herefordshire
HR2 0NL

ABOUT YOUR COMMENTS

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- ☐ Appellant
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YOUR COMMENTS ON THE CASE

Aubreys - appeal comments and reiteration in summary of my original objection (Aubreys P232851/F 18-06-2024

I am writing to restate my objection to the proposed development of Aubreys. The proposal for an excessive expansion of the original footprint and additional buildings is not in character with other structures in the Olchon valley and surrounding areas. In addition the proposed plans do not align with local and national planning policies which have been put in place in order to safeguard areas like the Olchon Valley that have a unique landscape and important heritage.

The scale of the proposed development in comparison to the original footprint of the existing derelict farmhouse and the traditional placing of further out buildings is excessive and out of proportion. The plan is also overwhelming with the proposed use of non traditional building materials.

An adverse and detrimental impact on the local environment and natural habitats during and post building works is a significant factor. The proposed plans outline further encroachment of the land with additional structures and an extensive driveway spreading over several fields. Again not sympathetically following the original layout and cluster formation of buildings and access to the property. All potentially detrimental to what is a fragile and ancient landscape.

The current property is lacking in an infrastructure that could sustainably cope with the new proposed level of household waste water and sewage drainage. this would lead to a serious risk to public health and wildlife. In addition the current infrastructure of the one-car-width public highway, which is already in a shocking state, is not suitable for additional occupancy, large construction vehicles and courier traffic.

Aubreys can not only be seen prominently from multiple path/bridle ways in and around the valley and hillsides but from the public highway as well. The new proposed style and architecture that is incongruous with the rest of the valley will visually be in stark contrast and very prominent.

In conclusion I want to reiterate and confirm that I stand by my previous objections to the proposed plans of the building work at Aubreys. Whilst I have no objections to the RESTORATION of existing buildings that make up the current layout of an old farmstead that is in keeping with the valley this new structure and reinvention of Aubreys is out of form and character of the original buildings set in a unique valley - it does not meet key Planning Policy requirements.

I hope with all due respect that the Planning Inspectorate will stand by the original decision to refuse the proposed application.

Catherine Downie

Chapel Farm, Llanveynoe HR2 0NL

The Planning Inspectorate

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Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MR IAN DRAYCOTT

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White Rocks, The Doward
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Herefordshire
HR9 6DZ

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

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YOUR COMMENTS ON THE CASE

I have checked my own comments submitted originally in the planning process and examined other documentation regarding this application and wish to reaffirm my objection to this type of development in an area of Herefordshire, and indeed England. The Olchon Valley must be given the protection it deserves because from a landscape and biodiversity point of view it is still very special and is in more need of enhancement than uncontrolled land and building development.

I believe the context is crucial to this issue so please bear with me. The beautiful south-west corner of Herefordshire, the Golden Valley, has long been a candidate for greater protection from piecemeal development. In the 50s, much of it was originally due to be included in the Brecon Beacons National Park (now Bannau Brycheiniog) but this was apparently vetoed in Whitehall because it crossed a national boundary.

Later a plan to give the area AONB status was abandoned after opposition from the farming community who then formed the majority of the valley's population. Since then farms have been amalgamated and many farmers now run sidelines in hospitality to tourism. There has long been a dormant plan to raise it to National Landscape status but the process is arduous and it has not been a priority for Herefordshire Council.

The Olchon Valley, tucked away between the Black Hill (locally known as The Cat's Back) and the eastern ridge of the Black Mountains, is the most remote and untouched part of the area, so much so it was used on the cover of the current Herefordshire Local Plan. It is a massive amphitheatre which has entranced travel writers: "The views are sublime... wild grey



and brown moorlands where bleating sheep are looked down upon by scudding clouds swept along on endless winds." (Sunday Times). "The views from the top are cosmic. You climb into Lord of the Rings country, with gorse, heather and mysterious riders." (The Times). A 1946 book, *English County: A Planning Survey of Herefordshire* described it as "One of the most beautiful, most inaccessible and most thinly peopled corners of the West Midlands region." That would be only more true nearly 80 years later. Many people, even some living in the Golden Valley itself, have never heard of it.

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Aubreys is 1300 feet above sea level, much higher than anything ever built on the Olchon Valley's western slopes. In midwinter, the sun disappears behind the mountain at noon. The last tenants left around 1970 to farm in a more forgiving spot. And the house gradually decayed.

More than 50 years later the remains of the house and 25 acres of land were bought by the applicants, and they drew up their plans to live there, at least some of the time. They surely would have never got permission to build on a virgin hillside but Policy RA5 of the Herefordshire core strategy offered a glimmer because the cottage was, in a manner of speaking, still there.

The first version submitted by the applicants was on a massive scale and was formally rejected by the case officer, but they were informally encouraged to try again. After I was elected to become ward councillor, I was told that the officer was minded to accept the second, smaller version, on the basis that repurposing old buildings was important. However, after that officer left, there was a long silence before the third and so far final version emerged, now only twice the size of the old cottage.

And it came to the planning committee with one significant argument in its favour Herefordshire's core strategy's RA5 – re-use of rural buildings. However, RA5. Page 114, Requirement no. 4 “the existing buildings must be “of permanent and substantial construction capable of conversion without major or complete reconstruction.”

And the rider below: *“Policy RA5 is not intended to support the rebuilding of rural buildings which have fallen into a **derelict** state. .. Buildings should therefore be structurally sound and capable of bona fide conversion for the proposed use without **major reconstruction**.”*

Even when it was sold nearly four years ago potential buyers were warned not to go into the building because it was dangerous. The planning committee, on its site visit, were warned to go nowhere near. A favourable structural survey appeared 48 hours before the planning committee meeting in September 2024. Derelict, according to the Oxford English Dictionary, means: *Forsaken, abandoned, left by the possessor or guardian.*

I cannot believe any reasonable person, looking at this ruined farmhouse and the acro-props holding up several parts of it, could argue against that.

The planning report's conclusion rests on only one other policy. LGPC4 from the parish group plan issued by Longtown – the nearest large village in whose domain the Olchon Valley survives. Pamela Tribe, one of the authors of that plan, was adamant that their intentions were being misconstrued.

Longtown has already expanded considerably and its council is anxious to do its bit in providing the new homes the government want and our community desperately needs: small and affordable for the benefit of local people, especially the young and aged. Yet since the 1990s developers have insisted on building larger, expensive houses which have proved extremely hard to sell.

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Even if the farmhouse structure was not derelict, this would still be to be a building totally out of place. The other houses nearby are located discreetly on the valley floor. The additions proposed will shout across the countryside, sprawling across three fields in a place where the field patterns have been maintained for centuries. The most prominent home for miles around.

Aubreys' owners would have a fantastic view of the Cat's Back opposite; the people walking the beloved Cat's Back will have a view of this odd-looking construction. It will also be seen jarringly from the edges of the national park.

No independent person in the valley, the vicinity and beyond has offered support. In four separate votes the parish council has been unanimously opposed.

Increasingly, the whole of the Golden Valley depends as much on tourism as farming and the two are symbiotic. An assault on its most precious scenery is an assault on its economy. And however many changes are made to this application, the beauty of the Olchon Valley, this miraculous survival, will be tarnished, for the benefit of a single family with no local connection and to the detriment of everyone else.

The planning officer's report to the committee brushed aside the landscape officer, who has said again and again that every version was damaging and in breach of Herefordshire's LD1 and LD4; and the heritage officer's horror has been palpable.

There would be upheaval to the landscape caused by construction of the building and the track to the multi-car garage; damage to the narrow and fragile road, often more like a canal in winter, by the vehicles required for the earth-moving. And there is evidence produced by Mr Stones that the plans for drainage are based on incorrect information. None of the many thousands of words the applicants have commissioned and submitted to back the case has changed the almost unanimous opinion in the community that this would be the wrong house in the wrong place.

I am absolutely not against repurposing old buildings and I am acutely aware of the housing we need across this ward. I even know one or two abandoned buildings in the Olchon Valley where this might work without detriment to the environment. But I also know that other potential developers are watching this case believing that a go-

ahead would signal open house in the Olchon Valley -- and not for homes for people who need them.

The Olchon Valley is not an easy place to live. It is remote; it has rough weather, poor communications, terrible roads. But it is magical, thrilling, beautiful, tranquil, a triumph of nature.

This matter has been going on for years already. The project has already caused much bitterness in this idyllic setting. The council's committee's decision was taken fairly and democratically on the balance of planning advantages and I would urge that be allowed to stand.

Matthew Engel, Ward Councillor for Golden Valley South

Mr Sean Ernsting
Room 3D
Temple Quay House
2 The Square
Bristol
BS1 6PN

29 April 2025

Dear Planning Inspector

RE: PLANNING APPEAL AT AUBREYS, TO THE WEST OF MOUNTAIN ROAD,
LLANVEYNOE, LONGTOWN, HR2 0NL – REF: APP/W1850/W/25/3360896

Thank you for reading my appeal representation and my previous objections to planning application P232851. My Objections are dated 28.06.24; 23.04.24; 5.12.23 (jointly with Miriam Griffiths) and 6.11.23.

I have read the Appellant's Statement of Case and the Landscape and the Heritage appeal documents. The arguments put forward have not persuaded me to alter the strength of my views. I disagree with many of the statements in the documents – 2 examples: What the Appellant describes as "modest new build" is a new barn (larger than farmhouse) separated from the farm cluster with disturbance to the historic field/settlement pattern. Their term "faithful restoration" of Hay barn is inaccurate as it involves heightening walls for a crog loft for which there is no historic and structural evidence.

I mention only three of the essential planning policies where the proposals do not comply: the appellant's planning application contravene RA5 criterion 5 and RA3 criterion 4. The proposed plans for Aubreys do "not comply with or without the criteria not separated by a conjunction" of LGPC4 as attested by the long serving Parish Councillor who spoke at the Planning committee meeting and who had played a part in producing the neighbourhood plan.

Paragraph 208 of the NPPF (para 5.7.5 appellant's appeal statement) I observed no evidence that the Planning committee "did not have proper regard of the appellants' Heritage Impact statement and Heritage statement."

Under the Environmental benefits summary in the appeal statement (para 9.1) the appellant claims that there is "net enhancement to the natural

environment.” I disagree. First avoid causing damage, minimise the damage if unavoidable and lastly mitigate harm appropriately if first two options impossible. Appropriate mitigation would in this case mean the (almost impossible) recreation of upland acid wet meadow.

All my previous objections remain valid, and I ask that they form part of this representation. There are no Supporters of the two planning applications, and I know of no Objectors who have changed their minds in the light of the Appeal Statements.

Additional points:

- I have attended several Herefordshire Council Planning and Regulatory committee meetings, site meetings and attended the meeting where this application was determined. Herefordshire Planning meetings are professionally run, fair, considerate and follow correct procedure. I do not agree with the appellant that the planning committee “failed to apply policies or process fairly or consistently.” The appellant is incorrect in concluding that the committee undermined “public confidence in decision making.” (see Herefordshire Council YouTube live stream on 04.09.24)
- The Appellant’s Statement of Case includes a section on their first unsuccessful planning application 223196/F. As the appellant has made statements about this planning application in their statement of case, I hope that you can include their initial application in your assessment. I note that the Objections submitted to their initial application no longer appear on the Planning portal and trust that you can request them.
- The appellant puts forward no evidence for original first floor extensions to the Threshing & Hay barns and no references to show the existence of lofted barns in the local area. The cow house is a single storey building. Gable end walls of the Threshing barn (now covered with plastic sheeting) show it was a single storey building. The east facing wall of the Hay barn shows the full height of the original wall on top of which would have been a roof.
- I have not seen a detailed biodiversity survey of the Local Wildlife Site (LWS) – an area of ancient upland acid wet meadow grassland. The appellant’s claim that the LWS is degraded is not a factor in favour of this development. Careful management can repair any deficiency, as demonstrated in successful local meadows management schemes in the

locality and a less-than-optimal management of a LWS hitherto does not mean that this LWS is valueless and can be built over.

- The beneficial “impacts” of “proposed works” in the Heritage statement are exaggerated and distorted. E.g. changes to the farmhouse cannot be “major beneficial” whereas construction of a single-storey block to the rear of the farmhouse, which is two times larger than the farmhouse’s footprint, cannot be “neutral” when a retaining stone wall is removed and a major excavation would be necessary. In addition, no mention is made in the heritage Appeal statement of the heritage and landscape damage caused to the cluster of this non-designated heritage site by building a new barn, the course of the track and a hard standing car compound.
- The appellant in their statement of appeal details planning applications where they claim that the LHA showed inconsistency in applying planning policies. I give a few reasons why in the planning applications alluded to by the appellant that this was not the case.

P211365 Barlands. “Small scale” Survey report “walls surprisingly good condition” and “reasonably plumb”— not the case with Aubreys.

P233737 & P240880 Holywell cottage & Brooks farm. Parish council support for renovation. No extensions proposed. Built and Natural Environment conservation officer not consulted – both unlike Aubreys.

P3323592 contributes to National Housing Stock – a doubtful conclusion to make at Aubreys given the high-end value of the Appellant’s plans.

- **Non-material considerations:**
 - a. I urge that the importance of the Local (Special) Wildlife Site at Aubreys, and its continuity with the SSSI on the Bannau Brycheiniog National Park, is given due weight.
 - b. The excavation necessary for the proposed rear extension, into the boundary bank of the LWS, to the farmhouse would be huge. A modest rear extension linked to the threshing barn with retention of the retaining stone wall is an option and would negate the need for earth removal from the landscape. The appellant’s choice for the course of the track traversing a steep slope within the LWS would

result in extensive earth works. There are alternatives. Mitigation does not replace lost habitat.

- c. One motivation for my objections to this planning application is because the beauty of the Olchon valley and the rarity of many of the species of fauna and flora that live here.

Other considerations:

Like many former properties in this area Aubreys is no longer a viable working farm. There is no requirement for a large new barn (the footprint of which is larger than the original farmhouse) to house a tractor, a workshop and an unlabelled room.

In conclusion:

The appellant's desire for an additional large-sized home and a particular sized rural homestead for their family to visit is valid. However, inserting a large out of character development onto a small prominently positioned upland ancient historic farmstead site and into the exceptional landscape of the Olchon valley is not possible without causing significant irreversible harm. The unique and treasured views from the high ground surrounding the valley experienced by many local people and visitors will be permanently changed for the worse. Ecological destruction to ancient habitat will result from the appellant's choice of rear extensions, parking compounds, a new barn, and the course of the track.

I support the LPA decision reached on 04.09.24 that this application conflicts with policies LGPC4, 10 and 13 in the Longtown Group NDP; policies RA3, RA5, LD1, LD4, SS1, SS6 and SD1 in the Herefordshire Local Plan – Core Strategy and with Chapter 15 in the NPPF.

The NPPF, the Herefordshire Local Plan - Core strategy and the Neighbourhood Plan policies are explicit in their meaning and intention. The appellant's contention that the LPA has not interpreted these policies in their favour is without foundation.

Anthony Furness

Olchon Court Farm

Llanveynoe. Hereford. HR2 0NL

Aubreys Planning Appeal Case 3360896. (Herefordshire Planning Case 232851)

27 April 2025.

Dear Mr Ernsting

Please find below my Representation regarding the above Appeal case.

Yours sincerely

Miriam Griffiths. Olchon Court Farm, Llanveynoe, HR20NL.

Introduction:

I have lived and farmed in the Olchon valley for 16 years. As Chair of the Longtown & District Historical Society (established 1971) I am involved in local history research.

The Olchon Valley directly abuts the Bannau Brycheiniog (Brecon Beacons) National Park (BBNP) and the valley's landscape is a continuation of the BBNP's Black Mountains area. Before living here I was for 10 years on of the 'Friends of BBNP' Committee, involved in projects and policy-development, eg in a BBNP/Herefordshire Partnership. Last year I was invited by the BBNP Authority to contribute to the 5-year Plan for the Park and its fringes.

The Olchon Valley's iconic landscape status within Herefordshire is indicated by the aerial photo on Herefordshire's Local Plan Core Strategy (LPCS) front cover.

I Objected to this Aubreys Planning Application (case 232851) which is now subject to Appeal; my representations (Mrs M Griffiths) were dated 07/11/23; 21/04/24; 25/06/24. All my Objections still stand as they have not been addressed by the Appellant's three Statements of Appeal. I will not reiterate all my Objections but will focus on some material points, some of which are newly analysed for this Appeal, all of which are crucial to this case. These points are set out under three topic headings:-

1. Dereliction& Rebuilding/Extensions & Additions.
2. Harm to landscape and settlement character.
3. Housing policy.

1. Dereliction & Rebuilding/Extensions & Additions

1 (a) Dereliction & Rebuilding of extant walls

Aubreys is derelict, much of it skeletal, as can be observed at a site visit. [NB. Many of the walls are currently covered in anchored plastic sheeting which will impede essential on-site inspection of the state of the walls]

LPCS RA5 clause 4 (p114) only permits re-use of rural buildings where they "*are of permanent and substantial construction capable of conversion **without major or complete reconstruction***" (my emphasis). LGPC Neighbourhood Plan's Policy

LGPC 4 (P11) is predicated on “retention”, “repair”, “reinstatement” of redundant farmsteads – not on rebuilding and structural enlargements.

When considering the extant stone walls and the extent to which they are repairable without major reconstruction, there are crucial specific factors to consider. Most of the extant buildings at Aubreys (and indeed all the derelict stone structures in the Olchon Valley and E'n Black Mountains) are of dry stone wall construction of a localised vernacular character. The cottage at Aubreys has had some lime mortar added when it was 'Georgianised' – ie reshaped from its original probably 18th century format - in around 1830 (cf. date stone on front elevation). But the other Aubreys outbuildings are built in the original dry-stone walling. The structural character and history of this vernacular dry-stone walling is the subject of a scholarly book by specialist Dr Christopher Hodges, *'Derelict Stone Buildings of the Black Mountains Massif'*, 2015, Archeopress, which highlights the special, unusual heritage characteristics of the walls of these old buildings and their resulting significance in social history and the local landscape's heritage characteristics.

Anything other than keeping that dry stone walling methodology when repairing/restoring the walls would seriously harm the extant heritage value of the ruined buildings. To make a modern, ambitious dwelling of the type proposed (ie compliant with building regulations, able to bear a modern insulated roof and to support height extensions, capable of damp-proofing to modern standards, etc), substantial mortar would have to be introduced (building, filling, pointing), thus destroying or at the very least severely harming the intrinsic heritage value of the dry-stone entity/cluster as it stands.

But to what extent are the extant walls at Aubreys actually capable of restoration and conservation without significant rebuilding? The Structural Survey commissioned by the Applicant did not analyse how much of the extant dry-stone walling could actually be conserved as such during a process of modernisation; nor did it specify how much would need to be knocked down and rebuilt because walls are too crumbling, loose, cracked, leaning or bulging to conserve. Local dry stone wallers will attest to the impossibility of working on these sandstone dry-stone walls without extensive knocking-back and rebuilding: slightly adjust one crooked or loose stone and many more will slip, move or fall. Concrete underpinning of extant walls to provide foundations on which to build this modernising proposal would be harmful to heritage value; but without underpinning the walls would not be capable of what's proposed. (The extent of underpinning needed is rarely discernible without undertaking excavation, an action harmful to heritage value.)

The Applicant's Structural Survey did not demonstrate understanding or assurance that in order to limit harm to heritage value, traditional dry stone walling methods should be utilised, rather than an inappropriate reliance on mortar and modern techniques. This assurance is probably impossible because the intention to enable the walls to reach a specification needed for the proposed modernising enlargement and change of use is itself an intention incompatible with retaining the extant heritage value. I suggest that this is a major harm resulting from the proposal.

The Appellant suggests that planning cases 233737 and 240880 – both concerning disused rural stone buildings in the locality - are comparable in that they were permitted under RA5; but it was demonstrated that those properties were not in an advanced state of dereliction as is Aubreys and in those cases the Parish Council *et al* had no objections on that basis. The Appellant also cites an Appeal decision based on RA5 situated further away within the County(3308408) as a putative comparator; but equally, another comparator Appeal case (3304980) dismissed the Appeal against LPA Refusal on grounds of RA5 and obvious dereliction. Cases need to be assessed individually in terms of how skeletal and derelict each building is in relation to LPCS RA5.

1 (b) Extensions & Additions In order to comply with Herefordshire's LPCS RA5, clause 5 (p114), a rural building must be "*capable of accommodating the proposed new use **without** (my emphasis) the need for substantial alteration or extension, ancillary buildings, areas of hard standing....*".

The Longtown Group Parish Council Neighbourhood Plan (LGPC 4, p 11) similarly states that local rural farmsteads must be capable of 'retention', 'repair', 're-instatement', terms which, as noted above, do not encompass additions, extensions and new build.

The Aubreys Proposal entails numerous and disproportionately large alterations (including to roof heights), new extensions, joining structures onto the extant buildings and also a new-build ancillary building with hard standing and a track: all those features disqualify Aubreys under RA5 clause 5. Although there was some reduction of initially proposed sizes of new-build portions during the applicant's iterative discussions with Planning Officers during consideration of cases 223196 and then of 232851, those modest reductions do not rectify the inappropriate introduction of new-build elements which I and others cannot find a material Policy reason to accept. The rear (west) and side (south) extensions to the cottage inappropriately enlarge the proposed footprint and mass over that of the extant house; the footprint of the new ancillary building – garage, hard standing etc – is larger than the footprint of the extant house, thus causing it to compete in prominence with the extant buildings cluster.

With regard to joining-structures between a cottage and a nearby barn, it is unusual locally for this to be allowed and many such applications have been refused; it's not clear why at Aubreys this was not in that category.

2. Harm to landscape setting and traditional local settlement character.

The 2023 Herefordshire Landscape Characterisation report (informing the Local Plan) assesses the Olchon Valley's landscape, farming and settlement patterns on pages 158 ff, Chapter 7. (This report is an update to an earlier, much more detailed Landscape Characterisation Report undertaken in 2004). Herefordshire Council's Landscape Officer, in her comments on the application that;s now subject to Appeal, analyses the Aubreys proposal's negative impact upon all three of these patterns.

LPCS Policy RA5 states that it cannot be used to support *any "development(s) which individually or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting."*

The Aubreys proposal is for additions and enlargements which would bring serious harm to its setting and would be very detrimental to local landscape character and settlement patterns in the valley – crucial aspects of local heritage.

Paras 7.105/106 (P164) of the Landscape Characterization report highlight the small, irregular ancient field shapes in a landscape where traditional small hillside farmsteads (such as Aubreys) are sparsely dotted across the landscape, with each traditional farmstead forming a tightly-grouped, self-contained cluster of small buildings. This report calls this space settlement pattern *"unique to this part of the county"* while *"The organic, small scale enclosure pattern is particularly evident in the Olchon Valley where the steeply sloping topography throws it into sharp relief."* Aubreys is particularly visible and prominent, being the highest derelict farmstead in the valley, visible from many viewpoints, including from the roads below and opposite, from the popular Cats Back ridge path to the east, from valley farmland and ROW footpaths below.

By enlarging the extant buildings cluster with proposed extensions, joining structures and raised rooflines (these latter based on some apparently speculative assumptions about former rooflines long since disappeared), the proposal for enlarging the extant Aubreys farmstead significantly harms its local heritage value. Equally inappropriate and out-of-character is the introduction of the new ancillary building, hard-standing, paving etc in a different field from that in which the extant farmstead stands: this harmfully and harshly disrupts the traditional settlement pattern within the ancient field pattern. While this is exacerbated by the large (proportionately) size of the proposed new- build structures in comparison with what is already there, in essence any new ancillary building of whatever size would cause harm to valued and rare landscape and settlement patterns; Aubrey's prominent position makes the adverse effects particularly noticeable.

The Appellant suggests that planning cases 233737 and 240880 in the locality (which received permission) are comparable; but these 2 properties did not propose

substantial extensions or enlargement of footprint and those cases are not visible from public roads/footpaths, being screened from view by trees and topographical setting.

3. Housing Policy

In the Herefordshire LPCS and the LPGC Neighbourhood Plan much emphasis is placed on affordable housing. For example, in the LPCS, p30: para 3.35 – *“affordable housing is a priority for the county”* while para 3.33 emphasises the priority of *“affordability”* of rural housing; policy RA3 specifically caters for meeting rural affordable housing needs. The Aubreys proposal, which would require high levels of expenditure and a lot of heavy construction work, is not for an affordable dwelling (as defined by low market and rental value in relation to local need for small family homes). Nor does the proposal fit with the various points in LGPC 4 about appropriate residential use of restored redundant farmhouses for local, multi-generation families or small-scale local businesses. In the local area there is an abundance of high-end holiday homes in converted farmhouses and barns, of second homes for people based elsewhere, and plenty of high quality, high-priced modernised rural retirement properties; but the local housing need is for affordable family homes. Since the local neighbourhood and county Plans were published, the need for affordable homes has increased.

Final comments: the above representation focusses on some of the central determining issues with the aim of providing information and context that is vital to a consideration of this case. But in order to achieve a Planning Balance it is also useful and proper to weigh into the balance some other policy implications which, whilst perhaps not in themselves pivotal according to planning methodology’s hierarchy of determining factors, nonetheless do add very important and relevant weight to the considerations for determination. There are, for example, issues related to a number of LPCS environmental and sustainability policies such as SS6 which requires environmental quality to be enhanced. There are concerns regarding foul water drainage into a seasonally dry watercourse. Another example is Aubreys location on a Local (Special) Wildlife Site and immediately abutting a SSSI, which designations are mainly valuable here as non-improved, acid upland grassland and wet rough alder coppice and scrub and are very difficult to mitigate, create or replace. Factors like these will hopefully influence the making of the Appeal decision.

Thanking you
Yours sincerely
Miriam Griffiths

The Planning Inspectorate

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Appeal Reference: APP/W1850/W/25/3360896

DETAILS OF THE CASE

Appeal Reference APP/W1850/W/25/3360896

Appeal By MS CAROLINE GARDNER

Site Address
Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

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HR2 0PX

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

I would like to urge that this appeal is rejected as the, modestly revised, plans do not address the serious concerns previous raised. The proposed buildings would be out of character with the sensitive location and are still significantly too large and out of scale with houses in the valley.

The environmental impact of this work is not addressed, despite the sensitivity of the site.

The proposed major development would be a blight on a beautiful location and visible from a great distance.

I believe that this proposal is non compliant with planning policy on multiple levels and so do not understand why there are grounds for appeal.

As a local resident with a long and deep affection for the Olchon Valley I believe we must be very careful about developments if we are not to destroy what makes the valley so special.

The Planning Inspectorate

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HR2 0PD

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
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YOUR COMMENTS ON THE CASE

It is clear from the detailed list of grounds given for refusal of this application at its last submission that it fails as a result of breaking, or running counter to, local and national guidelines. I have no reason to believe that resubmission or appeal changes any of the material facts set out in Kelly Gibbons HDC's Refusal letter of 5 Sept 2024. I have in the past objected to this proposal on several grounds: it's impact on the immediate environment in terms, for example, of drainage and the proposed laying of a road across the fields around Aubrey's, on light pollution of the night sky, and the visibility of the proposed structures. This is clearly not a renovation: it is a new build masquerading as a rebuild. Something that would never be allowed in this, the most fragile of fragile places, the construction of which would severely impact the fragile local infrastructure. It meets no local need or purpose. The decision to refuse permission was soundly based, and made partly as the consequence of significant, well-informed, local representations, including that of the local councillor. It commanded the support of the majority of the relevant committee. I can see no reason why that decision should be reversed. Please help protect this precious wild space by upholding the decision.

Aubreys, Mountain Road, Llanveynoe, LONGTOWN, Herefordshire, HR2 0NJ

I would be grateful if the Inspector would take into account my previous objections when reviewing this appeal.

I am not against the careful restoration of Aubreys. In my own work I have repeatedly shown in the valley, and at nearby Craswall, that it is eminently possible to do this without compromising the existing buildings and site. However, the revised application fails to comply with adopted policies, and Appellants have failed to address valid objections raised by many people.

Despite the attempts by the Appellants (or their Agents) to denigrate the Conservation Officer's consultation submission, his document remains entirely apposite, but the well-reasoned advice tendered appears to have been ignored.

It is only thanks to Herefordshire Council's Conservation Officer that a last-minute structural survey was commissioned. This document was hurriedly assembled in a very late attempt to justify the proposals, and to minimise the potential harm which would follow, and it shows.

I will note below comments on the Appellants' Statement of Case:

Criterion 4

5.3.12 The buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction.

5.3.13 This criterion is not relevant to the harm alleged in the reason for refusal. There is no allegation that the buildings aren't capable of conversion without major or complete reconstruction. For clarity, the buildings are recognisable structures requiring varying degrees of repair and intervention. Some elements of the hay barn and threshing barn have been lost over time, such as roof structures and tops of the walls of the hay barn. The Structural Report confirms that the buildings remain permanent and substantial buildings. The required restorative actions are considered in the Structural Report too. It is confirmed that the cumulative works would not comprise major or complete reconstruction...

This is simply not the case. I inspected all the buildings comprising the farmstead at Aubreys when the property was for sale. I maintain that contrary to what the Appellant's suggest, none of the buildings, particularly the farmhouse, are capable of conversion without major or complete reconstruction.

Criterion 5

5.3.14 The building is capable of accommodating the proposed new use without the need for substantial alteration or extension, ancillary buildings, areas of hard standing or development which individually or taken together would adversely affect the character or appearance of the building or have a detrimental impact on its surroundings and landscape setting.

The proposals fail to meet this requirement.

5.3.16 The scheme includes some alteration and extensions to the buildings. However, they are significantly smaller in scale when compared with the original planning application. The proposal also includes an ancillary building which is significantly reduced in size and scale. Every request by the case officer to amend the design has been acceded.

But the valid concerns of the Conservation Officer have not been addressed, and the proposed new separate building, away from the farmstead is not in proportion to, and does not relate to, the existing cluster of traditional buildings.

5.3.19 Overall, the proposed development complies with the headline provision and five design criteria whereby it wholly complies with Core Strategy Policy RA5.

It does not.

I respectfully urge the Inspector to reject the Appeal, in the hope that more sympathetic proposals may be submitted.

Yours faithfully,

Nicholas Keeble B Arch Dip Arch

28th April 2025

The Planning Inspectorate

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HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

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ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

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☐ Other

YOUR COMMENTS ON THE CASE

This appeal does not in any way meet the objections that led to the initial refusal of the planning permission. The project is in no way a restoration, but a complete rebuild, using the presence of derelict buildings as a pretext for the construction of link structures and new spaces that will result in a McMansion that will be visible (unlike 233737 or 240880, which were allowed) from the public highway and the very popular Cat's Back walk. The proposed edifice and its huge, brand-new 'garage' building will materially alter the character of an area of extraordinary peace and beauty. It is hard not to see this as an attempt by big money to trample a democratic decision taken by people who live in a remote rural area and supported by the local planning authority. It should be rejected.

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SENDER DETAILS

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HR4 9PR

Company/Group/Organisation Name Longtown Group Parish Council

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

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- ☐ Agent
- ☒ Interested Party / Person
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☐ Other

YOUR COMMENTS ON THE CASE

Longtown Group Parish Council (LGPC) will say that it:

- Upholds all previous objections made in Nov 2023
- Disagrees with comparison made to Brook Farm (240880) and a Craswall barn (233737) which was not derelict, did not require substantial rebuilding and was not going to be made taller, bigger or linked to another building. It was not going to be overdeveloped as in the case of Aubrey's. These two do not conflict with LPCS RA5 and LGPC4
- A successful appeal is not in the interests of the area as Aubrey's is in a prominent position, clearly visible from the highway and both sides of the Olchon Valley. The cases cited are screened by mature trees.
- The two cases referred to did not include additional modern buildings conflicting with the character of the heritage. Neither did they involve large unsuitable link buildings significantly increasing the size of the footprint, shape and character of the original buildings.

LGPC stand by the original evidence produced by Councillor Pamela Tribe:

"1. Does it meet the local need for affordable housing? There is no evidence for this.

2. Does the development ensure the retention or repair of any heritage asset? It is in such a derelict state that it is unclear how much of the heritage building would remain. The Neighbourhood Plan categorically stated that a building should be restored and not be a new-build.

3. Is this a live-work development? There are no plans for commercial units, it is planned to be a large family dwelling.

4. Does it maintain the integrity of the building? The main extension behind the farmhouse would dominate it, being over twice its size. The Hay barn roof would be raised disproportionately to the size of the farmhouse, thus also dominating it. The Farmhouse would not maintain its integrity.

It is abundantly clear that the applicant is looking to build a new dwelling under the guise of restoring an ancient and historic farmstead. It does not comply with the Neighbourhood Plan in any of the criteria, either in fact or even in the spirit of the Plan.

The Herefordshire Local Plan Core Strategy is even more specific. RA5 makes it clear that it is not intended to support the rebuilding of rural buildings which have fallen into a derelict state. Buildings should be structurally sound and capable of bona fide conversion without major reconstruction or extension.

Last November our Parish Council objected to the proposal. I quote: Our objection is based on these considerations: they include the layout and density of the application, scale and dominance, the impact on trees, on wild life and nature conservation, the relevant provisions of the Neighbourhood Plan, as well as previous planning objections".

The Planning Inspectorate

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HR2 0NJ
Grid Ref Easting: 327355
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SENDER DETAILS

Name MRS ELIZABETH MAURICE-WILLIAMS

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ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☐ Interested Party / Person
- ☒ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
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- ☒ Statement
- ☐ Statement of Common Ground
- ☐ Interested Party/Person Correspondence
- ☐ Other

YOUR COMMENTS ON THE CASE

I wish to maintain my objections to this planning application which has already been refused twice by the Herefordshire planning committee. My reason for this is it will not only involve rebuilding of a ruined farmhouse but also very extensive further development around it. It will be situated in a very beautiful and unspoilt part of the beautiful Olchon valley and will be clearly visible from the surrounding hills, thus disfiguring the view.

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SENDER DETAILS

Name DR. ROBERT MAURICE-WILLIAMS

Address
Llanveynoe
Longtown
Herefordshire
HR2 0LL

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
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☐ Other

YOUR COMMENTS ON THE CASE

I wish to maintain my objection to this proposed development at Aubreys Farm. I note that the appellant has quoted 2 other local buildings where permission to renovate was granted (ref 233737 and 240880).

These cases are quite different to what is proposed for Aubreys. The Aubreys proposal does not just involve renovating a single ruined building but much wider further building which will disfigure the very fine surrounding landscape of the Olchon Valley.

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HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MRS ELIZABETH MAY

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Newton St margaret
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ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

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YOUR COMMENTS ON THE CASE

I read the documents submitted by the Appellant, with unjustified criticism of the professional opinion of the County Conservationist, but find her points not pertinent. The exemplars of other projects being given permission are only superficially similar in that they restore decrepit non heritage assets but neither Hollywell Cottage nor Broad Oak Barn extend beyond the original footprint and their geographical location is not prominent. Aubreys is at 390 m contour, and the extension both into the hillside and to the South are well beyond the footprint whilst the link to the original farm buildings would shed a lot of light and be very visible, as would the new barn. Despite amendments this is not restoring but developing.

Jeremy Milln FSA
43 Villa Street,
Hereford, HR2 7AU

FAO: Sean Ernsting,, Case Officer
The Planning Inspectorate,
Room 3D, Temple Quay House,
2, The Square,
Bristol BS1 6PN

Appeal Reference: APP/W1850/W/25/3360896
Date: 23rd April, 2025

Dear Sir,

Town and Country Planning Act 1990: Appeal by Ms Caroline Gardner

Aubreys, to the west of the Mountain Road, Llanveynoe, Longtown, Herefordshire, HR2 0NJ

Proposed restoration and residential use of the farmstead at Aubreys including: the conversion of and extension of the existing farmstead, proposed detached building for garaging, workshop and plant storage, extensive landscaping and rewilding of the wider site, the installation of an access track and associated works.

STATEMENT OF CASE

Introduction

I am Jeremy Milln, currently an elected member with Hereford City Council and chair of the Hereford Civic Society. I have forty years professional experience in archaeology and curatorship of the historic environment, much of it with the National Trust, and four as a serving member of Herefordshire Council Planning Committee 2019-23 (not the period of the determination of this application). I am a Fellow of the Society of Antiquaries and a member of Herefordshire's Woolhope Club. I am a member of the Dry Stone Walling Association of Great Britain and hold its Intermediate Level professional qualification.

Comments made in respect of this application and appeal are, however, my own freely given and not made representative of any of the above interests.

Planning Application

I refer to my submission dated 27th November 2023 published with the representations to planning application 232851 and appended to the end of this submission.

It is considered that the points made there remain relevant and merely require reiteration, not repetition for the purpose of my submission to this Appeal. I ask the Inspector that they be considered along with the following additional statement.

Support of Reasons for Refusal

The Appellant's Landscape Statement by Paul Harris seeks to rebut the identified conflict with Policies LGCP4 and LGPC13 of the Longtown Group Neighbourhood Development Plan, Policies RA3, RA5 and LD4 of the Herefordshire Local Plan – Core Strategy. These deal with the impact of

the harm to the existing building remains and their setting caused by the introduction of new and inappropriately scaled elements such as the 'new barn' associated with the creation of a contemporary style home.

It also seeks to rebut the identified conflict with Policy LGPC10 of the Longtown Group Neighbourhood Development Plan, Policies SS1, SS6, LD1 and SD1 of the Herefordshire Local Plan Core Strategy and Chapter 15 of the National Planning Policy Framework which deal with harm to the distinctive landscape character of the Olchon Valley caused by the introduction of elements such as car parking, hardstanding, retaining structures and access driveway associated with the servicing of a new home by motor vehicle.

No new changes have been made to the scheme, which would allay the identified harms, nor evidence provided which might suggest either such harms not to be material or that they are not in conflict with policy. It remains therefore a judgement as to whether such harms are outweighed by public benefit to be obtained in the creation of a new home at this location and the extent to whether such benefit might be better provided by a new home at another, more sustainable location.

It is a judgement which may consider the need to which any future occupants may have to live at such a location in terms of its functional and economic relationship with the land and whether such need, if it exists, is strong enough to outweigh the advice of NPPF 84 (Dec 2024) for the refusal of applications for isolated homes in the countryside.

It would also be a judgement as to whether a dwelling at such an isolated location not provided by public transport or by any accessible shop or service would satisfy Local Plan Core Strategy Policies MT1 and SS7 for the promotion of active and sustainable means of travel over dependence on the private car.

Historic Environment considerations

Application of Policy RA5 on reconstruction

Historic England, following the guiding principles of the Society for the Protection of Ancient Buildings, sets out a hierarchy of approach to the care of historic buildings, where *de minimis* conservation sits at the top, and speculative reconstruction, the bottom¹. At Aubreys, given the condition of most of the structures, they would be expected to require substantial reconstruction for structural integrity and energy efficiency in a modern home.

It is this level of reconstruction, coupled by alteration and extension, which is considered places the project at the lower end of the hierarchy. Historic England advises that intervention of this kind adversely impacts significance, as defined by the evidential, communal, aesthetic and associative values of the site. The works proposed at Aubreys would not be defined as conservation or even restoration, such as could be considered acceptable under Local Plan Core Strategy Policy RA5.

The applicant's *Statement of Heritage Significance* (J. Lake, January 2025) assesses the works to be neutral to beneficial. It is a judgement, the accuracy of which would depend on three factors, all of which would need to be satisfied:

- Objective and use. It is considered that it would only be beneficial in heritage terms to restore and use the buildings broadly for their designed purposes rather than rebuilding and conversion to a contemporary home. If construction is for contemporary uses of low

¹ Historic England *Advisory Note on the Reconstruction of Heritage Assets* (2016)

intensity, such as for basic bunkhouse accommodation for hill-walkers, then it is arguable the level of public benefit take precedence.

- Scholarship. The Historic England advice does allow for exceptions where reconstruction may be done in a scholarly manner, such as for archaeological research or in the case of structures of truly exceptional significance whose loss has been precipitated by accident or war. However these exceptions would not seem to apply at Aubreys. The scheme proposal is not one of informed conservation such as would satisfy the applicant's *Heritage Assessment* by Sam Hale (June 2024).
- Skill. Heritage skills in the building industry are in short supply. Many forms claim to offer them, but there is a real risk that, without the right skills and understanding of traditional materials, both in specification and implementation, the result becomes an overworked pastiche. The caveat here is where optimism bias leads to a false heritage assessment of 'beneficial'.

Dry stone walling

It has been noted that the predominant form of construction at Aubreys, as in the Olchon generally, is dry stone walling. The use of mortar, produced from the burning of lime, is not seen before the 19th century, much later than elsewhere due to the scarcity of limestone and fuel and the difficulties of transport. In response, local people became extremely skilled in the use of the distinctive, finely bedded and fissile sandstones of the St Maughan's formation of the area² and almost uniquely were able to construct tall sheer-sided walling without mortar.

The applicant's structural report from Kytex Ltd, in citing advice from the Dry Stone Walling Association at page 16, fails to appreciate that this is given in the context of the technique as it is usually applied, ie, in field walls and only very exceptionally, as in the Olchon, for roofed buildings. The DSWA's advice should not be relied upon in respect of the technique for buildings intended for modern domestic accommodation. It cannot be agreed that, given the behaviour of shallow-founded walls without mortar or with only fibre & clay earth fillings, which depend for their performance on their permeability and flexibility, that they can be satisfactorily repurposed domestically, given the need for impermeability and rigidity. This explains why the conversion of farm buildings in the Olchon, particularly roofless farm buildings in extremely poor condition as at Aubreys, cannot be achieved without breach of Local Plan Policy RA5 given the level of reconstruction and new construction and the impracticality of 'flexible ties' between indigenous and modern mortar-bound leafs of walling.

Landscape and Setting

The Aubreys site is visible from numerous receptors on the opposite side of the Valley and from almost the entire length of the popular 'Cat's Back' walking route along the Black Hill ridge. In terms of texture and form its buildings presently contribute positively to the landscape and their recessive colouration and dark tones add interest. The proposal includes extensions, new linking structures, new detached garage, increases in roof heights, external driveway and hardstanding works which, unlike the approach being taken elsewhere in the Olchon where grain and footprint are respected, would be injurious to the special character of this part of the Black Mountains.

As already noted, this conflicts with Local Plan Policy LD1 and, in the planning balance, it cannot be agreed that the quantum of public benefit suffices to outweigh the harms to landscape and setting by the introduction of discordant notes so extensively apparent.

² Historic England, *The Building Stones of England: Herefordshire* (2012, rev 2023)

Aubreys (centre of view) from the Cat's Back ridge, the
Hatterall Ridge behind, 20th April, 2025



Yours sincerely,

Jeremy Milln FSA

Comments of J. Milln made on 27th November 2023 as published with Application 232851.

- 1) It is doubted that the majority of buildings on the site are capable of re-use without the need for major reconstruction (**RA5(4)**), 'or extension, ancillary buildings, areas of hard standing or development' (**RA5(5)**). The exception under under Policy **RA3** is therefore not considered to apply.
- 2) The application is contrary to Herefordshire Local Plan – Core Strategy Policies **H2** and **RA3** which seek to direct rural exception housing to locations that offer reasonable access to a range of services and facilities found normally in a settlement identified at Policy **RA2**. The site is in excess of 5km (3.1m) from the nearest settlement listed in Policy **RA2**, a journey that would place reliance on the private motor car. The site is beyond what can be considered reasonable accessibility to the services and facilities offered and is thus in a location that is unsustainable and incapable of being made so, which is also contrary to Core Strategy Policies **SS4**, **MT1** and **RA3**. This fundamental issue represents significant and demonstrable harm that must be weighed against the modest social and economic benefits which accrue from the provision of a single dwelling. In conducting the planning balance, it is considered that the adverse impacts associated a dwelling in this remote, rural location, especially as it does not meet affordability criteria, significantly and demonstrably outweigh the benefits such that planning permission should be refused.
- 3) The proposed 'new barn', although smaller than the previous scheme (223196) is not considered to be a subservient and ancillary addition to the function of the main farmstead, by virtue of its scale and proposed use. The unit would conflict with Policy **E4** of the Herefordshire Local Plan - Core Strategy. Additionally, the structure would still represent a substantial addition of new build form and associated hardstanding to the dwelling house and barn conversions beyond what would be accepted under Policy **RA5** of the Herefordshire Local Plan - Core Strategy. This is exacerbated by the cumulative impact of the proposed extensions and increased roofline of the barns which would result in substantial extension and additional built form to the modest farmstead as existing. Therefore, the proposal conflicts with the requirements of the aforementioned policies as well as Policy **SD1** of the Herefordshire Local Plan - Core Strategy and **LGPC4** of the Longtown Group Neighbourhood Development Plan with regards to inappropriate scale and subservience.
- 4) The proposed plate glass exterior walls are uncharacteristic of the local vernacular. They are not considered to reflect and enhance the character and interest of the non-listed heritage asset or of the sensitive landscape setting and are contrary to policy **RA5(1)**. In addition – by spilling artificial light - would threaten the NDP dark skies policy.
- 5) The proposed development, by virtue of the scale of the new built form and the introduction of a new driveway, would fail, by reason of its suburban form, to respond to the landscape character and key features of the Ancient Border Farmlands landscape type appearing out of keeping within the setting. The proposal would not have a positive impact on the landscape and does not conserve or enhance the natural, historic or scenic beauty of the Olchon Valley or the important, adjacent, Brecon Beacons National Park. Therefore, the proposal is in conflict with Policy **LGPC 12** of the Longtown Group Neighbourhood Development Plan, Policies **SS1**, **SS6** and **LD1** of the Herefordshire Local Plan Core Strategy and Chapter 15 of the National Planning Policy Framework.
- 6) The proposal is located within and directly impacts a Local Wildlife Site, the Risk Impact Zone for the Black Mountains SSSI, the Olchon Farm Meadows SSSIs, and partially in the Black Mountains Woodland SWS. In the absence of appropriate supporting information to evidence that there is no alternative solution or appropriate mitigation and/or compensation can be secured, the application fails to meet the requirements of Policies **LD2** and **SS6** of the Herefordshire Local Plan – Core Strategy, and Chapter 15 of the National Planning Policy Framework.

Trelachddu Farm
Mountain Road
Llanveynoe

To the Planning Inspector considering the appeal against the refusal to grant permission for the redevelopment of Aubreys, Llanveynoe - Reference: APP/W1850/W/25/3360896

29th April 2025

Dear Sir / Madame,

I am writing to urge you to reject the appeal against the refusal of permission for the redevelopment of Aubrey's, Llanveynoe.

I made a representation on the 3 September 2024 ahead of the planning committee meeting which refused permission on 6th September and I stand by the points I made then.

The Appellant's Statement of Case is essentially organised under two headings – Landscape and Heritage. Under both the Appellant argues that the harm caused by the proposed development is minor and that it is more than offset by the benefits. This is plainly not the case.

Of the many representations made in the run-up to the 6th September planning committee meeting, there were three submitted by the Council's Senior Landscape Officer, Mandy Niell, and two by the Council's Senior Historic Buildings Officer, Conor Rutledge. I believe these are among the most considered and relevant of the representations made. Both point to very significant harm to a special landscape and to a heritage asset, while neither considers the benefits to be meaningful.

Further, in considering the requirement of RA5, that "the buildings are of permanent and substantial construction capable of conversion without major or complete reconstruction" the HBO writes that "this application lacks a structural survey to demonstrate the buildings are capable of the specific conversion proposed without need for major or complete re-construction". He goes on to conclude that "it is clear from the submitted design package that the site and buildings – with a more modest degree of extension and linkage accepted - are not capable of providing for the applicant's specific needs within the parameters of that recommended philosophy as both schemes have garnered the same heritage responses from the outset, and these were not 'initial reservations' as suggested within the Heritage Impact Assessment, but

consistent and fundamental concerns.” Looking at the pictures provided in the HBO’s second submission on 27th of June 2024, it is clear that the existing ruins are not capable of conversion without major or complete reconstruction and that a dwelling capable of providing what the Appellant requires can only be achieved with significant extension, new building and other infrastructure and landscaping. This is not restoration of a heritage asset, rather its loss. As Mandy Neill points out: “in fact the derelict stone structures make a positive historic reference in the wider setting”. It would be much better if they were left as they are.

It is also worth pointing out that, were the appeal to succeed, it would open the way for the redevelopment of other historic ruins in the upper Olchon Valley – Town House, The Place, Fords, Blaen, Penywylod - to the very considerable detriment of a very special place.

Yours faithfully,

Bill Mills

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/W1850/W/25/3360896

DETAILS OF THE CASE

Appeal Reference APP/W1850/W/25/3360896

Appeal By MS CAROLINE GARDNER

Site Address
Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MRS EMMA MILLS

Address
Trelachddu Farm
Llanveynoe
Longtown
Herefordshire
HR2 0NF

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground

☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

Having spent a considerable amount of time going through the plethora of documentation provided by the Appellants and the reports commissioned by them, I write to reiterate my original objections for the Aubrey's proposal; it does not meet planning policy requirements (in particular RA5, LPGC4, LGPC 13, LGPC10 and that on balance, the disadvantages of this scheme outweigh the advantages.

Aubreys is derelict, a ruin. Whilst the Appellants argue that their proposal is sensitive, the fact remains that the proposed development is markedly different from the loose grouping of original buildings which are a prominent characteristic of farmsteads in the area, and the use of glass links, a significant separate new build and the linking of the various buildings will make that characteristic hard to read and will be of negative value to the non designated historic asset. In addition, I feel that the proposal contravenes both LGPC 10 and the Brecon Beacons Dark Skies National Park Policy; the glass links would be very visible, affecting views not only from the road below Aubreys and also on the other side of the valley, but perhaps more importantly from the Cat's Back and from Offas Dyke Path, the latter being the eastern most edge of the Brecon Beacons National Park and running just up hill from Aubreys. Given the Wildlife Site Designation, there are ecological concerns to do with light pollution. So whilst the Appellants have been at pains to point out the landscape benefits, it is my view that on balance, rather than an enhancement of landscape value, it detracts from it, and I agree with the HC Landscape Officers objections.

As someone who has followed this case closely, researched it thoroughly and observed the Planning Committee meeting I find it somewhat shocking that the Appellant implied that the Planning Committee didn't do its job properly. Whilst a bystander, it appears very obvious to me how much time and resources the relevant planning people have put into this.

The Appellants have brought forward what they obviously see as 'precedents' in two local cases, perhaps to imply further a lack of consistency. However, it is my view that neither Hollywater or the Barn at Brook Farm are remotely comparable; both of them involved renovation and alteration within the original footprint of the buildings. The Appellants have also cited Garland's, won on appeal. This again I feel, offers no comparison. It involved the renovation and repair of the existing cottage building with only the addition of a single storey side extension; in other words a modest, non complex proposal which preserved character of the extant building. Aubreys does not have this simple, small scale nature of development. It should also be pointed out that Barland's is in woodland; Aubreys as explained above, is visible both from ground level and from above, from paths which are very popular with walkers and a strong rationale for visiting the valley.

The Appellants have flagged up this case mainly it seems to me because it draws on Framework 80, being physically separated from any settlement and resulting in an isolated home in the countryside. In my view that is an erroneous argument as Aubreys is part of a pattern of historic settlement in the defined community that is the Olchon Valley, and it creates an expensive, relatively large dwelling that is far removed from providing affordable local housing which is a tenet of local housing policy.

It is also of concern that the Aubreys proposal - if allowed - will set a precedent for the other ruins in

the valley, now selling for exorbitant prices well beyond the budget of locals.

So for all these reasons, I strongly feel that the benefits of the scheme are outweighed by the various disadvantages outlined above, and I must remain as a firm objector to the scheme. Thank you for taking the time to read this.

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

Please note that comments about this case need to be made within the timetable. This can be found in the notification letter sent by the local planning authority or the start date letter. Comments submitted after the deadline may be considered invalid and returned to sender.

Appeal Reference: APP/W1850/W/25/3360896

DETAILS OF THE CASE

Appeal Reference APP/W1850/W/25/3360896

Appeal By MS CAROLINE GARDNER

Site Address
Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MR COLIN MOREL

Address
Betty Howells
Llanveynoe, Longtown
HEREFORD
HR2 0NG

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

I have previously commented on this application and would like it noted that I stand by the comments already made.

In brief: Whilst I am in favour of the proposed property being brought back into use, I feel that the scale of the proposed works is not in keeping with the valleys scattered small building heritage. The property is as such derelict, and allowing the scale of development to go ahead is tantamount to allowing a new build in a very visible rural landscape with noted heritage. The site is, and always has been, part of a farm small holding as is the nature of the properties in the valley, and should remain as close to such as is possible. The proposed development would seem to be contrary to RA5 in scope and condition.

The appellant notes that other building projects in the area have been allowed, but as far as I can see none of their quoted examples are of such a size and scope, both 233737 & 240880 had sound walls capable of renovation, neither had large linking structures and outbuildings outside of the original buildings footprint. Also, none of them are in such an area of visibility high in the head of a valley.

I therefore stand by my original comments and feel that for this to proceed the scale of building must be much reduced and any outbuildings sited maybe nearer to the road access which would be more appropriate for any farm/workshop based building.

With respect,
Colin.



jjp planning

www.jjpplanning.co.uk

Mr Sean Ernsting
Room 3D
Temple Quay House
2 The Square
Bristol
BS1 6PN

28 April 2025

Dear Mr Ernsting

RE: PLANNING APPEAL AT AUBREYS, TO THE WEST OF MOUNTAIN ROAD , LLANVEYNOE , LONGTOWN, HR2 0NL – REF: APP/W1850/W/25/3360896

I act on behalf of a group of local objectors and have been commissioned by Dr A Furness to submit an objection on their behalf to the above planning appeal.

This submission follows representations submitted on 30 June 2024 during the course of the planning application. We would like to confirm that those representations still stand and should be considered by the Inspector. These representations have sought to respond directly to the planning appeal submission and the appellant's Statement of Case, and should be considered in addition to the earlier representations.

My client's main concerns are outlined below.

Planning Context

The appeal site comprises a former farmstead that stands in a ruinous state. The poor state of all buildings on site are detailed within the appellant's structural inspection report. The Haybarn and Threshing barn are in particularly poor condition.

It is not known when the farmstead was last occupied, no evidence has been provided of this. It is clear, however, that the use of the site was abandoned long ago and that the residential use of the former farmhouse would fail the established tests of abandonment set out in planning caselaw. In this context, it should be acknowledged that the scheme does not propose the resurrection or restoration of a dormant residential use but instead the introduction of an entirely

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new residential use in open countryside where there is an established policy of development restraint.

The site is considered a non-designated heritage asset, a relic of small-scale 19th century hill farming and evidence of the changing nature of agriculture. The remnants of the buildings have heritage value as they currently stand and can be readily appreciated and interpreted within the landscape. Through this planning appeal the Inspector is invited to consider to what extent the proposed development would deliver heritage benefits and whether this alone could justify the introduction of a new residential use in an unsustainable location which itself is likely to cause harm to the heritage asset (that it is seeking to protect) and the wider landscape as a whole.

We respectfully request that the Inspector is mindful of this context in determining the appeal.

Assessment against relevant planning policies

Section 38 (6) of the Planning and Compulsory Purchase Act, 2004 requires that in making any determination under the Planning Acts, Local Authorities shall make the determination in accordance with the policies of the Development Plan unless material considerations indicate otherwise.

The appellant has sought to justify the principle of the proposed development with reference to policies RA3 and RA5 of the adopted Core Strategy and LGPC4 of the Longtown Group Neighbourhood Development Plan (LGNDP). Landscape and Heritage aspects of the scheme have been primarily justified with reference to LD1, LD4, SS6 of the Core Strategy and LGPC 10 and LGPC 13 of the LGNDP.

It is considered that the appeal scheme does not accord with these policies. An assessment of the proposal against the most relevant aspects of these policies has been undertaken below.

Policies concerning the Principle of Development

Policy RA3

The appellant has attempted to justify the proposal under criterion 4 of Policy RA3, which is permissive of proposals that would result *‘in the sustainable re-use of a redundant or disused building(s) where it complies with Policy RA5 and leads to an enhancement of its immediate setting’*.

Although compliance with Policy RA3 relies heavily on compliance with Policy RA5, there are two requirements that should also be satisfied, namely:

1. The re-use of redundant or disused buildings should be sustainable, and
2. The proposal should lead to an enhancement of its immediate setting.

It is not considered that the proposal is capable of meeting either of these two requirements. With reference to the first requirement, the proposal would undeniably result in an isolated new dwelling within the countryside, which is unsustainable. For the second requirement, the appellant has put forward the case that the proposed development with the introduction of a new residential use and the construction of a new building, new extensions and a new vehicular access would enhance the existing buildings and their settings.

The appellant's case is not accepted. There is already inherent value in the buildings as they currently stand. Their current tranquil setting is by no means degraded and has significant value in its present untouched state. The 'enhancements' proposed may tidy up the site, but landscape value will be lost in this process. The conversion of the former farmstead to a large dwelling with a new vehicular access and garaging will have a pronounced domesticating effect on the character of the landscape. The introduction of gardens, patios, bbqs and other paraphernalia will undoubtedly have an adverse impact. Consequently, for this reason alone and irrespective of Policy RA5, the proposals fail to comply with Policy RA3.

Policy RA5

The appellant has provided a detailed response to the relevant criteria of Policy RA5. Criteria 1, 3, 4 and 5 are considered below.

In respect of criterion 1, whilst it is accepted that effort has been taken to assess the historic significance of the farmstead, the appellant has not demonstrated that the proposed scheme represents the '*most viable option for the long-term conservation and enhancement of the former farmstead*' because no other options have been presented or considered.

A spectrum of options might include:

- Leaving the site as it stands.
- Modest repair works.

- Modest scheme focussed on the reuse of the house only, with no additions.
- Repair and reuse of all structures, but no demolition or introduction of new structures; extensions or linkages and,
- The present scheme.

No consideration has been given to alternative options. Justification for the appeal scheme and the proposed level of intervention and development is entirely lacking. Given that the principle of development appears to rest heavily on the proposal being the optimal viable use to secure the preservation of the (undesigned) heritage asset, there appears to be scant evidence to justify this, and in particular the most intrusive elements, namely:

- The large rear extension the dwarfs the original cottage.
- The large new domestic parking compound and new garage building to the north.
- Significant alterations to collapsed structures to make them suitable for the purposes of living accommodation (including increasing the height of the original walls and inserting lofts), and
- The need to link up the outbuildings into a larger block of development, thus eroding their heritage value.

Accordingly, it is not considered that the proposed scheme accords with criterion 1.

Turning to criterion 3; whilst the domestic use of the site has the potential to be compatible with neighbouring uses, it is considered that the amount of development and landscape intervention would not be. The large garage and car parking compound to the north of the site would, in particular, appear out of keeping with the surrounding use of the land. Historically this has always been an agricultural landscape with small scale ancillary residential uses associated with it. The proposed scheme would introduce domestic use of a scale and nature never before seen in this location. Given this, it is considered that the appeal site fails to comply with criterion 3.

The appellants claim compliance with criterion 4, stating that the buildings are of permanent and substantial construction, capable of conversion without major or complete reconstruction. For this assertion the appellant has relied upon a 'structural inspection' report. Whilst the professional opinion of Kytex Ltd is respected, we consider the final conclusions of the report to be at odds with the observations made.

This is particularly the case for the Haybarn and Threshing Barn, which are so dilapidated that the precise design of the original structures remains unknown. In the case of these buildings, entirely new walls, roofs, openings and floors are proposed. This stretches the definition of the term 'repair' to the point of absurdity. The former buildings will provide little more than a footprint with which to base new structures upon. Accordingly, it is not considered that the proposed scheme meets the requirements of criterion 4.

The proposal clearly does not accord with criterion 5. In addition to the substantial rebuilding of some existing structures, substantial alternations and new buildings are proposed including:

- New vehicular access track.
- New garage compound and carparking area.
- Substantial new extension to the rear of the original dwelling, and
- Linking extension between structures.

Both individually and cumulatively these will adversely affect the character and appearance of the original buildings and wider area.

Policy LGPC4

In addition to the above, it is not considered that the proposal would accord with Policy LGPC 4 set out within the Neighbourhood Plan. Taking each criterion in turn

- a) The proposal is not intended to meet a local need for affordable housing.
- b) Whilst the appellant has implied that the scheme constitutes 'enabling development' no formal assessment or costings have been provided to justify this.
- c) The appellant has also indicated the scheme would include a live/work element, but in reality, this would mean little more than the provision of a study.
- d) As stated above, through the introduction of new elements, the proposed scheme will do more to disrupt the original form and layout of the farmstead than reinstate it.

Taking the above into account, it is considered that the proposal would not comply with Policy LGPC4.

Heritage and Landscape Policies

LD4 and LGPC 13

Policies LD4 and LGPC13 are similar in nature and are supportive of sensitive proposals which conserve the character of historic farmsteads. In this case, for the reasons set out above, it is not considered that the proposal meets this policy objective.

In the case of the Threshing Barn and Haybarn, the proposal would involve rebuilding the structures 'in the style' of their former selves. This will entirely defeat the conservation objectives of the proposed scheme. Furthermore, the level of intervention and quantum of entirely new development will harm the character of the original farmstead, breaking up its historic structure, and having an adverse impact upon the character of the wider landscape.

The conclusions reached about the net impact of the proposal within the appellant's Heritage Appeal Statement appear inconsistently weighted. The restoration of the farmhouse is considered to have a 'Major Beneficial' impact whereas the very large rear extension to the farmhouse is not considered to have an adverse impact at all. We note that no assessment has been made about the heritage impact of the proposed track, parking and compound on the historic setting of the former farmstead. We urge the Inspector to make independent judgements as to the impacts of the proposed development.

Policies LD1, SS6 and LGPC 10

The introduction of a new residential use, new domestic features and buildings including the access track, compound, large extension and linking extension shows a poor understanding of 'local distinctiveness' and a failure to meet the objectives of Policy SS6 and LD1. The site already contributes positively to the area's rural character, the introduction of these elements will only erode this rural character contrary to the objectives of Policy LGPC10.

Other Material Considerations

Other relevant material considerations raised by the appellant in this instance include the provisions of the National Planning Policy Framework (NPPF) and other planning decisions made.

NPPF

Para. 84

As stated above, no evidence has been provided to demonstrate that the proposed scheme would represent the optimal viable use of the undesignated heritage asset. To enable a considered assessment to be undertaken the appellant would need to provide alternative proposals and full costings for these. Notwithstanding this, even if the present scheme could be demonstrated as 'most viable' it is not considered that the proposal will enhance its immediate setting, which is in no need of enhancement.

Para. 207

Whilst it is considered that the appellant has adequately described the significance of the heritage asset in accordance with para, 207, they have failed to acknowledge the practical difficulties of attempting to preserve buildings in such a poor state. In this instance it is considered that the scheme would damage the assets that they are claiming to preserve.

Para. 208

The appellant's commentary under para. 208 appears to read as more as a procedural complaint. There is no reason to suggest that the LPA did not read and take on board the findings or the Heritage information submitted with the application whilst also making good use of their own in-house expertise.

Para.210

All three matters raised in para. 210 were considered by the LPA as a whole, but in this case members did not agree that the new development would make a positive contribution to local character and distinctiveness.

Para. 216

Para. 216 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application, with a balanced judgement required having regard to the scale of any harm or loss. Members appeared to have undertaken this balanced judgement and it is reflected in the reasons for refusal. In this case it is considered that the harm arising from the proposed scheme on the heritage assets, their immediate setting and the wider landscape would outweigh any benefits arising from their preservation.

In addition to the above, the appellant has sought to justify the proposal with reference to the Council's housing land supply deficit. The appellant has demonstrated a poor understanding of the presumption in favour of sustainable development, and how it should be applied.

If the presumption in favour of sustainable development is engaged, **it does not** automatically mean that the most important development plan policies are out-of-date for the purposes of decision making. The courts have established that the most important policies are deemed to be out-of-date **only** for the purposes of engaging the presumption in favour of development, the weight given to individual policies remains a matter for the decision maker. This subject is discussed extensively in *Suffolk Coastal District Council v Hopkins Homes Ltd* [2017] (para.s 54-61) and *NH Hallam Land Management v SSCLG and Eastleigh Borough Council* [2018] (para.s 44-48).

'The NPPF does not state that the decision-maker must reduce the weight to be given to restrictive policies according to some notional scale derived from the extent of the shortfall against the five-year supply of housing land.' *NH Hallam Land Management v SSCLG and Eastleigh Borough Council* [2018] – para. 47.

As set out above, determining whether the presumption in favour of sustainable development should be engaged, considering the weight that can be attributed to development plan policies and then undertaking the final balancing exercise is a multi-stage process. The LPAs lack of five year housing land supply does not mean the decision maker is compelled to set aside every policy relevant to housing. The applicant's conclusions in para. 8.2.9 of the Statement of Case are incorrect. Each and every policy can still be attributed weight for the purposes of decision making and the level of weight is a matter for the decision maker.

Irrespective of the above, it should be acknowledged that the proposal is for a single, large open market dwelling and therefore the contribution that it would make to addressing the LPAs housing land supply deficit would be negligible.

Other Planning Cases

The appellant alleges that the LPA has been inconsistent in their decision making with similar cases and have cited a number of applications that have been approved. We consider that very limited weight should be given to these cases as they differ materially from the current appeal scheme.

On two of the cases presented: 233737 (Upper House Farm/ Holywell Cottage in Craswall) and 240880 (barn at Brook Farm, Longtown), we note the following differences with the appeal scheme:

- The appeal property is derelict and ruinous, with walls that require substantial rebuilding. The examples given were of sound construction, capable of renovation and repair.
- The appeal scheme proposes the addition of extensions, link-structures and raised roofs whilst the other two local cases retain the footprint (in one case, demolished certain modern additions) and basic configuration.
- The appeal scheme proposes a large new garage/workshop building and ancillary structures (hard-standing) divorced from the farmstead. Neither of the other 2 local cases proposed large new buildings etc to be added to the sites, and
- The appeal property is in a very prominent, visible, high, open position, clearly visible from the public highway around the Olchon valley and overlooked by the Cats Back ridge walk to the east. Neither case 233737 nor case 240880 are visible from a public highway or from footpaths by nature of the immediate landscape; and both are screened by mature trees from public view.

Planning Balance

As stated above, it is considered that the structures are not capable of conversion to residential use without the need for substantial rebuilding work. This issue alone, however, is not determinative of this case. In reaching a conclusion on this planning appeal it will be necessary to weigh any benefits of the scheme against the adverse impacts.

It is acknowledged that the scheme would deliver biodiversity benefits, although any planning application on this site would have to deliver statutory 10% Biodiversity Net Gain in any event. Other benefits cited by appellant include the provision of live/ work arrangements and the new self-build housing, these benefits appear marginal. The only substantial benefit listed by the appellant is the preservation and enhancement of the heritage asset, this, in turn, has been double counted as a landscape benefit.

As previously stated, it is considered that the level of intervention and development proposed would generate harm sufficient to outweigh any benefits arising from the preservation of the farmstead. The farmstead is situated within a highly valued landscape where almost any form of

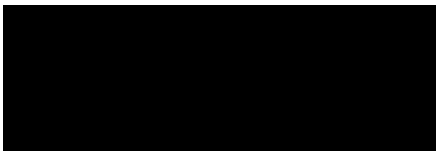
development or intervention would have an adverse impact. In this case most damaging will be the insertion of the access track and parking compound with garage. This combined with the large extension and reconstruction of the outbuildings (not to their original design) would render the ambition of 'preserving' the farmstead almost meaningless.

Accordingly, for these reasons, we consider the balance to weigh heavily in favour of **dismissing** this appeal.

We trust that you will take this submission into account when determining this appeal.

Kind regards

Yours faithfully



Justin Packman

MPlan (Hons) MRTPI

Town Planning Consultant

The Planning Inspectorate

COMMENTS ON CASE (Online Version)

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Appeal Reference: APP/W1850/W/25/3360896

DETAILS OF THE CASE

Appeal Reference APP/W1850/W/25/3360896

Appeal By MS CAROLINE GARDNER

Site Address
Aubreys, Mountain Road
Llanveynoe
LONGTOWN
Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MR ALAN PICTON

Address
1 Great Brampton Park
Madley
HEREFORD
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ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
- ☐ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☐ Statement
- ☐ Statement of Common Ground
- ☒ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

My previous objections were submitted on 29th April and 13th July 2024 and I stand by both of those objections.

In addition, with reference to pages 33/34 of the "Statement of Appeal", cases 233737 & 240880 are cited in support of the Appellant's submission.

However in both cases the walls were still sound, whereas at Aubreys the walls have deteriorated substantially and require rebuilding to attain structural integrity, and therefore do not comply with clause LPCSRA5 or neighbourhood plan clause LGPC4.

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SENDER DETAILS

Name MR STUART PROFFITT

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HR2 0PP

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YOUR COMMENTS ON THE CASE

The proposal to enlarge Aubreys well beyond its current footprint and in an manner unsympathetic to the original building remains deeply objectional to pretty much all local people. It would be a blot on a precious landscape and the reasons for which planning permission was rejected remain completely valid.

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Grid Ref Easting: 327355
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SENDER DETAILS

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ABOUT YOUR COMMENTS

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YOUR COMMENTS ON THE CASE

The appellant claims that similar planning applications in this area have been approved citing applications 233737 & 240880. These are in no way similar - Aubreys is derelict and would require considerable rebuilding, not just repair whereas both the foregoing cases were for relatively sound buildings. Policies LPCS RA5 and neighbourhood Plan LGPC 4 do not support rebuilding of derelict traditional buildings.

In addition, the proposed plan for Aubreys includes considerable further building, raising of roof levels, etc. none of which applied to the other applications, neither did they include a major new structure (in Aubrey's case a disproportionately large garage/workshop) The appellant's claim is therefore irrelevant.

I would further reiterate objections I made to the initial planning application that this proposed development would create a new and highly visible structure entirely out of keeping with the surrounding landscape.

Please reject this appeal.

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SENDER DETAILS

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HR2 0LE

ABOUT YOUR COMMENTS

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- ☐ Appellant
- ☐ Agent
- ☒ Interested Party / Person
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YOUR COMMENTS ON THE CASE

As a local resident, I feel that the proposals at Aubreys is an overdevelopment of the site. This is a unique and beautiful part of Herefordshire and the UK, and this house with its other buildings is going to be completely out of character and spoil the valley.

The 2 houses in question which the appeal refers to do not have any comparisons. They are in very different settings and their renovations were built on their original footprint. Aubreys is going to extend the original dwelling enormously and this is why I feel the original decision to refuse the planning should stand.

The Planning Inspectorate

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SENDER DETAILS

Name MR DAVID STONES

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Llanveynoe
HR2 0NH

ABOUT YOUR COMMENTS

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YOUR COMMENTS ON THE CASE

H&S Concern

I would be grateful if you could pass this message on to the Appeal Officer, Mr Sean Ernsting.

While reviewing the Appellant's Appeal Form, I noticed that the section regarding the presence of any Health & Safety issues was marked "No." I am concerned that this could lead to a potential safety risk during the site inspection, if the Inspector may rely solely on this information.

In my professional capacity as a Construction Manager, I must highlight that—despite the appellant's Structural Engineer's report—the buildings at Aubreys present a significant risk of collapse. It would be unwise to enter to these buildings without undertaking a detailed risk assessment and an independent structural analysis.

This risk may well be apparent to the Inspector upon arrival, but I felt it important to flag it in advance—better safe than sorry.

Formal Objection to Appeal Ref: APP/W1850/W/25/3360896 – Aubrey's, Longtown

To: The Planning Inspectorate

Appeal Ref: APP/W1850/W/25/3360896

Site Address: Land known as Aubrey's, Longtown, Herefordshire

Date: Monday 28 April 2025

From: David Stones

Dear Mr Earnsting,

I write to object in the strongest possible terms to the appeal lodged for the proposed residential development at Aubrey's, Longtown.

This scheme fails to meet multiple key policies in the Herefordshire Core Strategy. I will focus specifically on the failures of the drainage strategy, as there are significant technical shortcomings that are not subjective. These failures provide clear, objective, and irrefutable reasoning why this proposal must be refused. Further in-depth details can be found in my representations on the planning portal.

1. Non-Compliance with Core Planning Policies

The proposal fails to meet several key planning policies within the Herefordshire Local Plan Core Strategy:

Policy	Description	How It Fails
SD3 – Sustainable Water Management	Requires developments to demonstrate no increase in runoff and to incorporate sustainable drainage.	Surface water runoff calculations massively underestimate the true contributing area. The applicant incorrectly calculates runoff based only on proposed impermeable areas. EA guidance clearly states that the entire site area must be used unless robust infiltration or capture measures exist. Additionally, the drainage survey admits the site is largely impermeable, meaning almost all rainfall will ultimately enter the surface water system and increase flood risk. There is already local flooding at this site and surrounding area, as demonstrated during consultation. No flood risk assessment has been provided as required.

Policy	Description	How It Fails
SD4 – Wastewater Treatment and River Water Quality	Requires no adverse impact on water quality and compliance with environmental standards.	<p>The foul water drainage strategy proposes discharge into a seasonally dry ditch, which is a clear breach of General Binding Rule 19, and risks unmitigated nutrient pollution entering the River Wye SAC catchment.</p> <p>The drainage strategy has not been updated to reflect the seasonal nature of the ditch, meaning there is currently no valid drainage solution before the Inspectorate.</p> <p>The seasonal ditch has been witnessed on site by the Planning Committee and evidenced during the consultation process. It is common knowledge that the ditches on the south slopes of the Olchon Valley are seasonal and are typically dry from April to November.</p> <p>BR19 is ultimately the technical support to SD4.</p>
LD2 – Biodiversity and Geodiversity	Protects biodiversity, particularly in designated areas like SACs.	The development would increase phosphate loads into the already failing River Wye SAC catchment.
SS6 – Environmental Quality and Local Distinctiveness	Protects rural landscapes, watercourses, and historic character.	<p>The development threatens the fragile landscape character and unique environmental quality of the Olchon Valley.</p> <p>The Olchon River has many precious species that are sensitive to pollution. It has a precious population of Dippers and Grey Wagtails, otters, water voles and shrews, trout etc. These animals are dependent on the fresh water creatures e.g shrimp, stonefly larvae, mayfly nymphs and small fish to survive and these food sources are very sensitive to pollution from sewage.</p> <p>We are seeing the lower river catchments in the Wye being decimated of all life by pollution. Legislation requires these upper catchments to be protected.</p>

Thus, the appeal scheme conflicts with multiple fundamental planning policies and cannot be considered sustainable development under the National Planning Policy Framework (NPPF).

2. Failure to Comply with General Binding Rules

The development breaches the following General Binding Rules (GBRs):

- BR4: Must not cause pollution: ***Aubreys will cause pollution due to discharging to a seasonal dry ditch.***
- BR7: Must not be within 50m of a spring: ***Aubreys is within 50m of a spring. NB springs can be polluted even if they are above the effluent discharge point. This is raised as the Appellants drainage consultant argues otherwise.***
- BR16: Must meet necessary planning policies (SD3, SD4, LGPC14). ***Aubreys does not comply with these core planning policies as laid out in this document.***
- BR17: Must not be within 500m of an SSSI. ***Aubreys is within 200m of The Black Mountains SSSI, and its is within the SSSI Impact Risk Zone for planning applications.***
- BR18: Must not be within 50m of a SAC, SPA, or ancient woodland. ***Aubreys is within the Wye Valley SAC.***
- BR19: Must not discharge to a seasonal ditch. ***Aubreys will discharge into a seasonal dry ditch. The dry ditch has been witnessed by the Planning Committee.***

NB: Allowing the applicant to "apply for a EA permit" as suggested by the Councils drainage advisor cannot solve these binding rule breaches. Planning permission must not be granted where breaches are already evident as the development could not lawfully proceed.

3. Fundamental Defect: No Valid Drainage Strategy

- The drainage strategy has not been updated following clear evidence that the receiving watercourse is seasonally dry.
 - The submitted drainage proposals are therefore invalid.
 - There is no lawful or viable surface water or foul water strategy before the Inspectorate.
 - Granting permission without a valid drainage strategy would contravene both planning law and environmental law.
-

4. Historical Context and Unsuitability for Modern Occupation

Although Aubrey's may have been minimally occupied over 100 years ago, environmental and societal conditions were vastly different:

- There was no detergent or chemical pollution.
- Effluent volumes were tiny compared to today's domestic volumes of several thousand litres a day.
- The small amounts of waste would have been composted not discharged to ditches.
- Modern residential use generates massive volumes of polluted runoff and foul water, fundamentally incompatible with the site's limited drainage capacity.

Historic occupation cannot and should not be used to justify unviable, harmful modern residential development.

5. Other Heartfelt Concerns

- The Olchon Valley is a rare and fragile natural environment, treasured by local communities and visitors.
 - Granting this development would irreversibly degrade the landscape, encourage further unsuitable development, and harm biodiversity.
 - Wildlife, including species dependent on clean, low-nutrient streams, would suffer from cumulative pollution.
 - Local residents' deep-rooted care for this landscape would be disregarded by allowing unsuitable development that clearly cannot comply with modern environmental standards.
-

6. Conclusion

Given:

- Objective technical failures in the surface and foul water drainage strategies increasing the flood and pollutions risks,
- Breaches of Core Strategy Policies SD3, SD4, LD2, and SS6,
- Multiple breaches of General Binding Rules,
- A total absence of a valid, updated drainage solution,
- Serious risks to the River Wye SAC and local landscape integrity,
- Other planning policy failure. The scheme fails planning policies: LGCP4, LGPC10 and LGPC13 of the Longtown Group Neighbourhood Development Plan, Policies LD1, LD4, RA3, RA5 SS1, SS6, of the Herefordshire Local Plan – Core Strategy and Chapters 15 & 16 of the National Planning Policy Framework, because of the inappropriate scale of the development and failure to respect its landscape, character, significance and setting accordingly.

I respectfully urge the Planning Inspectorate to dismiss the appeal in its entirety.

Thank you for considering this representation.

Yours sincerely,

David Stones

Glandwr, Olchon Valley Road, HR2 0NH

Aubreys - appeal comment and reiteration of some of my earlier objections, all of which still stand.

The Aubreys proposal would transform the humble harmony of the site, imposing extensions, new link structures, and raised rooflines that would radically distort the scale and spirit of the existing buildings. In stark contrast, applications 233737 and 240880 respected the historical footprint, preserving both the form and character of their original structures without encroaching further upon the land.

Where the old buildings once nestled together in a traditional cluster, Aubreys now proposes a large garage and workshop, set apart and out of scale—an intrusion that fractures the integrity of the historic grouping. This new structure looms large beside the modest originals, disrupting not only their proportions but the deep-rooted heritage they quietly uphold. Neither of the previous applications introduced such disproportionate additions, nor did they stray so far from the architectural language of the past.

Perhaps most jarring is the setting itself. Aubreys site occupies a high, open slope, fully exposed to the eye—visible from the public highway that winds through the Olchon valley and from the celebrated Cat's Back ridge walk, a vantage loved by many. The earlier cases, by contrast, were discreet: tucked away, screened by mature trees, and invisible from road or path. Aubrey's proposal, if approved, would leave a lasting scar on a cherished landscape—where others trod lightly, this plan presses heavily.

The Appellant now draws attention to two other planning applications—233737 at Upper House Farm/Holywell Cottage in Craswall, and 240880 for a barn at Brook Farm, Longtown—suggesting these approved developments mirror their own and imply inconsistency in the Local Planning Authority's decisions. These comparisons, found on pages 33 and 34 of the Statement of Appeal, attempt to cast doubt on the planning process itself, despite an acknowledgment that each case must be judged on its own merit.

But these two cited examples bear little true resemblance to the proposal at Aubreys, and the comparison dissolves under scrutiny.

Unlike the Aubreys application, neither 233737 nor 240880 stands in direct conflict with the core policies designed to safeguard the landscape and heritage of this area—namely LPCS RA5, and Neighbourhood Plan policies LGPC 4 and LGPC 13. The buildings in those cases were structurally sound, with intact walls capable of renovation. They whispered of the past, and were gently restored without departing from the form or footprint of what once stood.

In stark contrast, Aubreys is a ruin. Substantial rebuilding—not simply repair or sensitive renovation—would be required to resurrect it. But RA5, particularly Clause 5, is unequivocal: the building must be capable of accommodating its proposed new use without major alteration or extension, without the imposition of ancillary buildings or hardstanding, and without harm to its character or its landscape setting.

The Aubreys proposal fails this test. It is not a revival—it is a reinvention. Where the other two cases worked with what remained, Aubreys would rebuild and expand upon what has already been lost, in ways policy explicitly warns against. The attempt to liken these cases may be rhetorically convenient, but it is both misleading and unfounded.

The Aubreys proposal gives scant regard to one of the site's most fundamental limitations: the absence of adequate drainage for proper sewage treatment. It appears to press forward without securing the necessary oversight or approval from the Environment Agency, raising serious concerns about both process and consequence.

Even more troubling is the proposed discharge of waste into nearby dingles—seasonal channels that run dry for much of the year. These are not reliable watercourses, but fragile hollows in the landscape, ill-equipped to handle the burden of untreated effluent. The implications are stark: a threat not only to the delicate balance of local wildlife and ecosystems, but to public health and hygiene.

Such a disregard for environmental integrity undermines any claim of sustainability. What should be a careful stewardship of land risks becoming a source of pollution and ecological harm.

Summary relating to Planning Policies and their Application

1. Core Strategy Policy RA5 – Re-use of Rural Buildings

This policy governs the sustainable re-use of redundant or disused buildings in rural areas.

Clause 5 is particularly significant:

- The building must be capable of accommodating the proposed new use without substantial alteration or extension;
- It must not require ancillary buildings or large areas of hardstanding;
- The proposal must not adversely affect the character or appearance of the building or its surroundings and landscape setting.

Application:

The Aubreys proposal conflicts with RA5 as the structure is derelict and requires substantial rebuilding and additional buildings, whereas cases 233737 and 240880 involved structurally sound buildings and minimal interventions.

2. Neighbourhood Development Plan (Longtown Group) – Policies LGPC 4 and LGPC 13

LGPC 4 – Conversion and Re-use of Rural Buildings

- Supports conversion only where buildings are of sufficient historic or architectural merit and structurally capable of conversion without major reconstruction.
- Emphasises preservation of form, scale, and setting.

LGPC 13 – Landscape and Visual Impact

- Requires that development proposals respect and conserve the distinctive landscape character, views, and natural features of the area.
- Discourages visual intrusion or disruption of historic rural clusters or skylines.

Application:

The Aubreys proposal fails LGPC 4 due to the derelict state of the building and the scale of reconstruction needed. It also breaches LGPC 13 by introducing large, conspicuous structures in an elevated, highly visible location, undermining the historic rural cluster.

3. Environmental Regulations and Wastewater Management

The proposal appears to lack proper drainage infrastructure and proposes discharge into local dingles, which are dry for much of the year.

Relevant requirements include:

- Environment Agency guidance on foul drainage in non-mains areas;
- General Binding Rules for small sewage discharges;
- Need for sustainable drainage systems (SuDS) that avoid contamination of land and watercourses;
- Protection of local ecosystems under the Water Framework Directive and UK biodiversity obligations.

Application:

By failing to secure proper Environment Agency approval and planning for effective sewage treatment, the proposal presents significant risk to wildlife, public health, and environmental sustainability.

Summary of Comment on Appeal: Objection to Aubreys Proposal

Dear Sir / Madam,

I wish to reiterate my strong objection to the proposed development at Aubreys. This application stands in stark contrast to relevant local and national planning policies, and to the precedent set by comparable applications in the area. It poses clear risks to the heritage character of the site, the surrounding landscape, and the local environment.

1. Scale, Character, and Design Conflicts

The proposal introduces substantial new extensions, link structures, and increased roof heights which would radically alter the size, shape, and traditional character of the original buildings. This represents a significant overdevelopment. Unlike approved cases 233737 (Upper House Farm/Holywell Cottage) and 240880 (Barn at Brook Farm), which preserved the original footprint and respected the integrity of existing structures, the Aubreys scheme reimagines the site rather than conserving it.

Additionally, the inclusion of a large garage/workshop building—set apart from the existing cluster and disproportionate in scale—undermines the coherent, historic grouping of the site. This proposal does not tread lightly on the land; it imposes itself, with lasting and detrimental effect.

2. Visual and Landscape Impact

The site sits in a conspicuous, elevated position, open to public view from the Olchon Valley road and from the well-trodden Cat's Back ridge walk. This visual prominence exacerbates the impact of the proposed development. In contrast, the cited comparator cases were both screened by mature trees and hidden from public highways and footpaths.

This is a clear conflict with Neighbourhood Development Plan policy LGPC 13, which seeks to preserve visual amenity and protect the area's distinctive upland landscape.

3. Inappropriate Comparisons with Other Applications

The appeal makes reference to cases 233737 and 240880 as evidence of inconsistency in decision-making. However, these cases differ fundamentally:

- The buildings involved were structurally sound and suitable for renovation without major reconstruction;
- They complied with Core Strategy policy RA5 Clause 5 and Neighbourhood Plan policy LGPC 4, which allow conversion only when buildings can accommodate new use without substantial alteration or extension.

By contrast, Aubreys is derelict. It would require extensive rebuilding and new ancillary structures—precisely what these policies are designed to resist.

4. Environmental and Drainage Concerns

The application provides no robust solution for sewage treatment. It proposes discharging waste into local dingles which are dry for much of the year—unsuitable for effective wastewater dispersal. This raises significant public health and ecological concerns.

This apparent disregard for Environment Agency guidance, the General Binding Rules for non-mains drainage, and sustainability principles, poses a serious threat to the local environment and biodiversity.

Conclusion

The Aubreys proposal is fundamentally at odds with planning policy and good environmental stewardship. It represents overdevelopment, disregards the character and setting of the site, misrepresents precedent, and fails to provide adequate infrastructure for safe habitation.

In light of these material considerations, I respectfully urge the Planning Inspectorate to uphold the original decision to refuse the application.

Katharine Stones

Glandwr, Llanveynoe, HR2 0NH

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Herefordshire
HR2 0NJ
Grid Ref Easting: 327355
Grid Ref Northing: 233031

SENDER DETAILS

Name MR CRISPIN THORNTON JONES

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HR2 0JW

ABOUT YOUR COMMENTS

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- ☐ Appellant
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YOUR COMMENTS ON THE CASE

I see that the planning application has been resubmitted, largely unaltered, since being rejected on the grounds of it being inappropriate in 2024.

South Herefordshire is one of the ostensibly unique areas of Britain. The Olchon Valley, adjoining the Bannau Brycheiniog national park, remains miraculously unspoilt.

It is surely the job of the local council to preserve this special corner of England, and not to allow over elaborate development. Aubrey's is one of a number of derelict cottages in the Olchon Valley that could be developed if allowed. At present the Olchon is much loved by visitors, the Catsback providing good access to the Offa's Dyke path.

The overdevelopment at Aubrey's, if permitted, would create an unwanted precedent, and the whole nature of the valley will be inevitably altered. Rather than being an unspoilt wildlife haven it will become a rich man's enclave, and be increasingly inaccessible to the general public.

A more modest plan for Aubrey's could be made, using the existing footprint as a guide. The local stone salvaged from the existing walls could be used to create a more modest house and a new precedent created for future development.

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SENDER DETAILS

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HR2 0ND

ABOUT YOUR COMMENTS

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YOUR COMMENTS ON THE CASE

I reiterate my earlier objections to this appeal...completely out of character with the landscape , far too extensive and complex proposal, when the ruined barn should either be restored without additions or extensions or left as it is. Claims that this sort of holiday development is no different from others already granted are spurious and exaggerated. I am also very worried about foul water contamination of the soil and the Olchon stream below...the small brooks nearby routinely dry during summer spells, so where is run off etc to go? Local employment depends to a significant degree on the tourists who come to admire the largely unspoilt scenery and enjoy high level walking, staying locally...the proposal would contribute significantly to undermining their enjoyment. Finally, it's not in accordance with a number of planning regulations nor needed to support housing needs in the area.

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ABOUT YOUR COMMENTS

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YOUR COMMENTS ON THE CASE

I objected to the original proposal because I felt that the planned development was totally inappropriate in the Olchon Valley, a place of great landscape and natural beauty and which I have known well for more than 40 years and where I have carried out research on river birds and also on the flora of the valley. I do not feel that the new documents allay my concerns and I wish to re=iterate all my original objections and vehemently oppose this proposed development. It will damage the special landscape and cause damage to the valley's flora and fauna.

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HR2 0PH

ABOUT YOUR COMMENTS

In what capacity do you wish to make representations on this case?

- ☐ Appellant
- ☐ Agent
- ☐ Interested Party / Person
- ☒ Land Owner
- ☐ Rule 6 (6)

What kind of representation are you making?

- ☐ Final Comments
- ☐ Proof of Evidence
- ☒ Statement
- ☐ Statement of Common Ground
- ☐ Interested Party/Person Correspondence

☐ Other

YOUR COMMENTS ON THE CASE

The Appellant's Statements of Appeal do not significantly alter the application thus my previous Objections to this development remain relevant:

This proposal is too big, distorting the character of a small traditional farmstead & environs to grossness.

Whatever use it's put to, artistic, commercial, domestic, the prominence of the site from the road, from across the valley, from the mountain itself, will look inappropriate. It is an inappropriate enlargement. It is unsuited to the local landscape setting. The buildings are derelict and therefore it will not be possible to repair and renovate the stone walls as they will need extensive rebuilding; this goes against policies such as RA5 in the Herefordshire Local Plan, and LGPC4 in the Neighbourhood Plan.