
WEST BERKSHIRE COUNCIL

PLANNING APPLICATION: 23/00815/FULL

PART RETROSPECTIVE. CHANGE OF USE OF LAND FOR THE FORMATION OF 5 GYPSY/TRAVELLER PITCHES COMPRISING OF 1 MOBILE HOME, 1 TOURING CARAVAN, AND 1 UTILITY BUILDING PER PITCH

1.0 INTRODUCTION

1.1 As a registered Chartered Member of the Landscape Institute, I was asked by West Berkshire Council to review the submitted LVIA (Landscape and Visual Impact Assessment) by Draffin Associates as part of the above application.

2.0 SUBMISSIONS

- LVIA (Landscape and Visual Impact Assessment) by Draffin Associates 30th August 2023
- Landscape Strategy by Draffin Associates. Drwg No 877/01, August 2023
- As Proposed Site Plan, by WS Planning Architecture Drwg J004472-DD-05 Rev E, August 2023
- Tree protection Plan by David Archer Associates. February 2024

2.2 On the 22nd of November 2023, the North Wessex Downs AONB changed its name to the North Wessex Downs National Landscape.

3.0 ASSESSMENT AND REVIEW OF DRAFFIN'S LVIA

3.1 When undertaking a review of a LVIA, the guidance: Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020) can be followed. This guidance forms the basis of my review, alongside my own assessment and observations. A visit to surrounding public areas was undertaken on the 1st of August 2024.

3.2 Draffin Associates also used the baseline for their assessment as the partly built site, as this is a retrospective application the baseline for this assessment should be the site as it was before any work associated with this application was undertaken. The site previously was a partly hedged grass field as shown on Draffin's aerial photograph (Appendix B).

Undertaking the review

3.3 There are three main components of a review of a LVIA, in respect of the completeness, competency and reliability of the LVIA. They are as follows:

1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
2. Checking the baseline, content and findings of the assessment;

3. Checking the presentation of the assessment findings.

Review of the Methodology:

- 3.4 The LVIA included their own methodology as set out within their Appendix C. Overall, the methodology was incomplete and also did not follow the GLVIA 3rd Ed guidance explicitly to identify the sensitivity of the landscape and visual receptors (their value and susceptibility to harm) and how the magnitude of change and overall significance of effects on the identified receptors has been assessed. Due to the lack of clear definitions, subjective wording was then used and relied upon throughout the LVIA; for one example, with regard to the effectiveness of the mitigation measures, it was not clear when in time when the author was referring to. The author frequently used the terms... *short term, eventually, temporary*. It must be clear at each stage of an assessment the time the author is referring to, this is usually stated in years, Year 1 – day one of opening, and Year 15, when any proposed mitigation measures (planting) might have matured. Note: the scope and methodology hadn't been agreed with West Berkshire Council.

Review of the baseline, content and findings of the assessment:

- 3.5 Site Context: The site is located within the North Wessex Downs National Landscape, within open countryside, 64m north from the settlement boundary of the village of Hermitage. Located in-between linear residential development to the south (outside the settlement boundary) and the detached property Sandhill House to the north. To the east is a linear woodland which covers the now redundant cutting/embankments of the ex-railway line (Didcot Newbury & Southampton Railway line) which is also covered by a blanket TPO. This ex-railway line is now a pathway known as the Eling Way. To the west, the roadside hedgerow marks the site boundary, with open fields further to the west of the road, permitting long open views to wooded skylines, a feature of this area of the National Landscape.
- 3.6 Site Description: The LVIA provided two descriptions of the site, the first under land use described the original character (pre works) of the site as an open field enclosed by a mature hedgerow to Hampstead Norreys Road (LVIA para 3.2) and the second description: the site in its current state, which Draffin described as .. *mature broken field hedgerow boundaries with the inner site consisting of grassland and recently deposited permeable hardstanding parking and static caravans and low pitch division fencing*. The LVIA also provided 6 site photos (viewpoints 17-22) which show the condition of the current site. A plan produced by WS Planning Architecture also illustrated the extent of tree canopies from the roadside hedgerow and adjacent TPO woodland, which shows how these tree canopies extend from the western and eastern edge into the site.

Reporting on landscape character and referencing National and local Landscape Character Area Assessments:

- 3.7 North Wessex Downs National Landscape (AONB): The LVIA references the NWD National Landscape (para 4.1) however does not consider the NWD AONB Integrated Landscape Character Assessment Technical Report (LUC, March 2002) or the NWD AONB Management Plan 2019-2024. As stated within the NWD AONB Integrated Landscape Technical Report, the site is located within *Character Area 8A: Hermitage Wooded Commons*. Described as a lowland area with variable land cover forming an intricate mosaic of woodland and pasture and small areas of remnant heathland, large interconnected woodland blocks and a strong hedgerow pattern with mature trees. A key issue for this character area due to the comparative accessibility is development pressure particularly for new residential development including suburbanising influence of built development (e.g. Fencing, lighting and paddocks). Key management requirements include conservation and enhancement of key assets, namely: ancient and semi-natural woodlands, pasture, field patterns and hedgerows. There are also opportunities to enhance the landscape through restoration of the hedgerow network.

- 3.8 The NWD AONB Management Plan then provides further guidance and states... (LA06) *Ensure that all development in or effecting the setting of the AONB conserves and enhances the character, qualities and heritage of the North Wessex Downs landscape.*
- 3.9 West Berkshire Landscape Character Assessment 2019 (WBLCA 2019): Draffin's LVIA referenced the WBLCA 2019. The site is located within LCA WH4: *Cold Ash Woodland and Heathland Mosaic*. LCA WH4 is described under a number of headings within the WBLCA 2019 as follows: Key characteristics, The evidence of past and cultural evolution, Natural landscape and priority habitats, Valued features and qualities, Detractors and finalising with a Landscape strategy.
- 3.10 In summary, LCA WH4 is described as a varied, complex and attractive land cover mosaic, with a varied field pattern with strong hedgerows and dominated by woodland with remnant heaths. The LCA WH4 is also described as relatively densely settled with woodland containment. Valued features and qualities for this area (WBLCA 2019 page 180) include the North Wessex Downs AONB, where the mosaic of ancient semi-natural woodlands, plantations, remnant heathland and open farmland are noted as special qualities relating to this character area. The varied landcover mosaic with its varied field pattern is further described within the WBLCA 2019 as an interesting and intimate landscape, where heathland, ancient woodland and grassland habitats add to landscape interest.
- 3.11 A listed Detractor for LCA WH4, states, as follows: *7) Loss of gradation between settlement and countryside: Farm buildings and small pasture fields adjacent to settlements have proved vulnerable to development (typically of small residential clusters), due in the former case to presence of existing structures and in the latter to the screening/containment provided by boundary features.*
- 3.12 The Landscape strategy for LCA WH4 lists and includes the following requirements (my underlining which would be relevant to the site):
- 1) **Conserve and enhance the special qualities of the nationally designated landscape of the North Wessex Downs AONB** Conserve and enhance the valued features of the North Wessex Downs AONB, including its varied landscape of woodland, heathland and farmland. Restore and enhance any features which have been lost or degraded. Ensure that changes in the landscape including land use change and development are sensitively sited and designed so as not to detract from the special qualities of the landscape.
 - 4) **Conserve and strengthen existing boundary elements** Seek to prevent further loss or decline in the quality of boundary hedgerows, and encourage restoration/reinstatement of hedgerows within expansive arable fields and around horse paddocks. Preserve the wooded context of settlements, to contain and filter the impact of built form.
 - 5) **Retain the distinction between and individual identity of settlements** Retain a sense of distinction between individual settlements through a clear understanding of the role of landform, tree cover and rural buildings in characterising settings and in forming boundaries that conserve and enhance distinctions in character – e.g. the historic farmstead at Henwick, along a rural lane, contained by tree cover and on rising ground, marks a rapid change to a rural landscape from the nearby edge of Thatcham. Avoid extended linear development along roads, which creates a more developed character resulting in the loss of individual settlement identity. More small-scale focused development set back from main routes often has less impact on character and can be more readily contained by landscape.
 - 6) **Conserve elements that mark a transition between settlement and countryside** Where possible retain small, enclosed fields around villages, and farm buildings which contribute positively to rural character.

- 3.13 As part of the suitability of this site for development, the proposals will need to adhere to the WBLCA 2019 landscape strategy for the *LCA WH4: Cold Ash Woodland and Heathland Mosaic*. As I have underlined, the site is located within the National Landscape, where fields form part of the varied landscape. Located on the edge of settlements, small fields are valued as part of the adjacent undeveloped landscape character and mark the transition between settlement and countryside.

Review of the visual receptors and visual assessment:

- 3.14 The LVIA identified 16 viewpoints for their visual assessment. These covered a variety of locations and visual receptors, as follows:
- Views from Hampstead Norreys Road (B4009 (Viewpoints 1-12)
 - Views from the Eling Way (Viewpoints 13-16)
- 3.15 As the LVIA did not include a clear recognised methodology, it wasn't transparent how the visual assessment had been undertaken. The LVIA should have clearly defined the existing view, the change in view at Year 1 (pre-mature mitigation measures) and then after 15 years. Summer and winter views should also have been assessed and referenced. Tables setting out each stage would also have provided a clear assessment; these were not included.
- 3.16 I agree that there are no long views and the views of the site are from the adjacent road and the Eling Way. Norreys Hampstead Road is a relatively busy road and a northern approach road to Hermitage, where the proposals will be potentially visible to a high volume of people. A few comments on these views are set out below:
- 3.17 Views from the adjacent Hampstead Norreys Road: Even within the summer months there are views into the site through the roadside hedgerow; within the winter months due to the deciduous nature of this hedgerow, these views will be more open. The existing view (pre any works on the site) would have included some filtered views of an existing grass field, this will change to a view of post and rail fencing, mobile homes, caravans, vehicles and small buildings. The sensitivity of users (receptors) of the road, as a road within the National Landscape wasn't included as part of the LVIA visual assessment. The LVIA stated views from this road would result in a slightly adverse effect, which within the LVIA's methodology means...*where the scheme would cause a barely perceptible deterioration in the existing view*. I disagree with this; the visual impact will be higher and at least a moderate adverse impact – where the scheme would cause a noticeable deterioration in the existing view. The proposed mitigation measures include new native hedgerow planting within the site, which when established could filter some views, however it will be difficult to plant within the existing roadside hedgerow, due to its narrow width, available space and planting under existing trees.
- 3.18 Views from Eling Way: The existing view, is looking up to the eastern edge of the site, as an open edge of field view. As on my site visit the view is now dominated by works associated with the application, including caravans and vehicles. The sensitivity of users (receptors) of this recreational route will be high, as set within the National Landscape and more sensitive to change than the Hampstead Norreys Road. The LVIA stated this would result in a slightly adverse effect, which within the LVIA's methodology means...*where the scheme would cause a barely perceptible deterioration in the existing view*. I disagree with this; the visual impact will be higher and potentially a substantial adverse effect – where the scheme would cause a significant deterioration in the existing view. The proposed mitigation measures include new native hedgerow planting along the eastern boundary, which if this can be established could further filter some views, however will also be difficult to establish under the existing TPO trees.

3.19 Overall, the visibility of the proposals will be as follows:

- The western hedgerow is narrow and deciduous, permitting views into the site from along the adjacent Hampstead Norreys Road, which within the winter months will become more open
- There are some filtered views from the Eling Way as shown within the LVIA's photos. Again, within the winter months these views will be far more open, permitting views of the eastern edge of the site and the development proposals
- As stated by WBC Highways, the design of the entrance has not been finalised. Potentially sight lines will require more of the site to be open to the Hampstead Norreys Road with increased open views of the development proposals.

3.20 Quality and suitability of submitted photographs: The photographs used within the LVIA do not comply with the...Visual representation of Development Proposals Technical Guidance Note 06/19 17th September 2019. The LVIA should have also stated what type of camera was used and the date they were taken. For photographs for an LVIA, a full frame camera should be used, with the photos easily printed out at A3, which can then be held at arm's length which would reproduce the existing view as close as possible for the reader. The presentation is also too small, and of poor-quality reproduction. All these aspects are unacceptable for a visual assessment to inform decision makers.

Review of the Landscape receptors:

3.21 To assess the impact of the development on the landscape, the assessment should cover the direct impact on the landscape features of the site (trees, scrub grass etc) and the original landscape character, and then the resulting indirect impact on the surrounding landscape character. This should have been clearly provided following the guidance as set out within the GLVIA 2013 3rd Ed. As set out as part of the application, the development proposals include the following:

- New access driveway constructed from macadam along the complete length of the western boundary (width circa 4m)
- Post and rail fencing 1.2m high with trellis
- 5 No Individual pitches constructed from a permeable hard standing, each pitch will contain the following:
 - Mobile home (10m long)
 - Touring caravan, and
 - Permanent shower room, including toilet (plan:3x2m and circa 2.7m high)

3.22 Mitigation Measures: Proposed mitigation measure are shown on the Landscape Strategy by Draffin and within the text of the LVIA (para 6.4.) No detailed planting plans were provided.

- 2m min width division strips between pitches, to include native tree groups, meadow margin and 1m wide hedgerow
- Western roadside – existing hedgerow to be managed, infill gaps with native trees and mixed hedging, meadow margin
- Eastern site boundary: Meadow margin, min width 5m, mixed tree groups, mixed hedgerow

3.23 The landscape impact of the proposals will result in an open field of grassland being replaced with development including over 80% hardstanding with 15 new buildings and structures and extensive post and rail fencing across the site. Collectively this will result in a substantial adverse landscape

effect on the valued landscape features of the site, its open grassland field character which will be highly significant especially within a site within the National Landscape. The proposed mitigation measures will not significantly reduce the effect to a level of impact as stated within Draffin's LVIA to a slightly beneficial landscape impact (para 8.8). Again, Draffin's assessment is misguided as their assessment was based on the baseline of a partially built site, not the original site as an open grass field.

- 3.24 The LVIA provided no assessment against the landscape character of the site, surrounding area and overall, its impact on the North Wessex Downs National Landscape. As stated within the published documents for the National Landscape and the WBLCA 2019, small fields with strong hedgerows on the edge of settlements are important and contribute to the landscape character of this area of the National landscape.

Review of Mitigation:

- 3.25 The proposed mitigation measures (LVIA: section 9) were presented as a strategy on Draffin's Landscape Strategy Plan, with no detailed planting plans supporting these proposals. As the LVIA relies on the mitigation planting within their assessment to reduce the overall landscape and visual adverse effect, they should have been presented in more detail. Whilst these measures might well, in time, reduce the level of harm to the appearance of the countryside from public viewpoints they would not address the harm to the intrinsic landscape character of the site. Even if visual harm is considered manageable, there is still material harm to the character of the countryside in this location through the siting of inappropriate development in a sensitive location.
- 3.26 Draffin's landscape strategy drawing compared to WS Planning Architecture Site Plan has not acknowledged how extensive the existing tree canopies are and how they intrude across the site. Generally. As shown on the Tree Protection Plan (David Archer Associates) the areas under the tree canopies on the western side of the site are proposed to be protected and enclosed by protective fencing, however on Draffin's Plan these areas are proposed as permeable hard standings. The encroachment of hard standings under these trees will affect their long-term health. Additionally, Draffin have proposed new tree planting under these tree canopies and also a hedge along the eastern site boundary, both will be difficult to establish.

Overall conclusion on the accuracy of the LVIA as supporting the planning application 23/00815/FUL

- 3.27 The LVIA was incomplete, contained subjective opinions and overall did not provide an objective assessment of the development proposals, for the reasons as follows:
- Inadequate methodology: The LVIA did not follow a recognised landscape and visual assessment methodology. Therefore, the judgements can only be the subjective opinion of the assessor
 - Inaccurate baseline: The assessment used the baseline as the presently semi-constructed proposals, then concluded the mitigation measures would therefore offer an improvement, this is a misguided form of assessment. The baseline should have been the existing undeveloped grass field.
 - Review of the baseline, content and findings of the assessment: The LVIA omitted relevant adopted evidence, in particular the NWD AONB Integrated Landscape Character Assessment Technical Report (LUC, March 2002) and the NWD AONB Management Plan 2019-2024. Not fully referencing these documents shows a lack of understanding of the baseline, what is of value and the proposed landscape strategy for this area and how the

open undeveloped character of the proposed site contributes to the landscape character and special qualities of the National Landscape.

- Lack of planning policy reference: The LVIA made no reference to the West Berkshire Local Plan 2006-2026 and in particular policies ADPP5, Policy CS7, CS14, CS19. Housing site allocations and the detailed planning considerations for travellers' sites.
- Presentation including plans and tables: The LVIA did not include any Visual and Landscape assessment tables, although not a requirement, there is a requirement to show a clear, methodical transparent assessment. The LVIA also contained
 - generalised plans not acknowledging tree canopies and the location of trees of value
 - Inadequate and poor-quality photos for the visual assessment

4.0 WEST BERKS CORE STRATEGY (2006-2026) DPD

- 4.1 **Policy ADPP5** recognises the area as a national landscape designation, where development will need to conserve and enhance the local distinctiveness, sense of place and setting of the National Landscape. Development should respond positively to the local context, and respect identified landscape features and components of natural beauty. As shown the site originally as a small grass field would have contributed to the rural edge of settlement character of Hermitage. The proposals have already resulted in an adverse effect on the landscape character of the site and adjacent area. Furthermore, the location of the site aligns an approach road into Hermitage, where there are views into the site, which will increase especially within the leafless winter months and will be visible by a large number of people.
- 4.2 **Policy CS7** states that for the purpose of considering planning applications relating to Gypsies, Travellers and Travelling Showpeople; sites which are not identified in the relevant DPD, are assessed against a list of criteria, with the last two as follows: *Will not materially harm the physical and visual character of the area; and where applicable have regard for the character and policies affecting the North Wessex Downs AONB.* As detailed within my review, the proposals will harm the physical and visual character of the area and will not conserve and enhance the National Landscape.
- 4.3 **Policy CS14** considers design principles, stating that... *new development must demonstrate high quality and sustainable design that respects and enhances the character of the area.* The proposed development includes features which are not only suburban in character but are also not characteristic to the area. Also due to the site's visible location and lack of adequate and available space along the western boundary, it will not be possible to provide any effective mitigation measures, leaving permanent views of the development from the adjacent Hampstead Norreys Road. As stated within this policy ... *Development shall contribute positively to local distinctiveness and sense of place.* The proposed development will not achieve this objective.
- 4.4 **Policy CS19** has, as its purpose, the conservation and enhancement of the local landscape character areas of West Berkshire. The appeal site is located within the National Landscape and within *Character Area 8A: Hermitage Wooded Commons.* As stated within this policy ... *in order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced particular regard will be given to ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.* The site due to the adverse effect on valued landscape features, its visible location, use of non-vernacular style, detailing and materials will not conserve and/or enhance the landscape character of this area of the National Landscape. The development proposals have also not met the requirements of the AONB Management Plan or the Landscape Strategy of the West Berkshire Landscape Character Assessment. The proposal is therefore in conflict with Policy CS19.

Housing Site Allocations DPD (2006-2026) Adopted May 2017

- 4.5 **CI: Housing in the Countryside:** This policy recognises new development must *contribute to the character and distinctiveness of a rural area, including the natural beauty of the AONB*. As I have highlighted within this review, the development proposals do not achieve this objective.
- 4.6 **TS3: Detailed Planning Considerations for Traveller Sites:** This policy states that proposals for development will need to: include appropriate landscape proposals, retaining and incorporating key elements of landscape character into the design; and provide a Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual Impact Assessment 3rd. 2013. This should then inform the development design and layout of the site and requirements for green infrastructure. Although a LVIA was submitted, it used the half-built site as its baseline, rather than the original grass field therefore its conclusion that the proposals will result in a slight beneficial impact are very misguided.

NPPF (2023)

- 4.7 As stated within the NPPF (December 2023) for achieving sustainable development (para 8): *an environmental objective - to protect and enhance our natural, built and historic environment*. The development proposals have not met any of the guidance as set out within the North Wessex Downs Management Plan. As stated within Chapter 12 (para 135) – achieving well-designed places... *decisions should ensure developments are ... a) will function well and add to the overall quality of the area; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping c) are sympathetic to local character and history*. Chapter 15 (para 180) which states decisions should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes. The site is set within the North Wessex Downs National Landscape, where great weight should be given to conserving and enhancing landscape and scenic beauty. As shown the proposed development will not comply with the NPPF with a proposed development which will result in significant and demonstrable harm as follows:
- The introduction of development including suburbanising elements and non-vernacular architecture on the rural landscape character of the North Wessex Downs AONB.
 - The loss of valued features and special qualities of the AONB, including a well hedged field of grassland on the settlement edge of Hermitage, which contributes to its rural character and transition to open countryside

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