

Landscape

Proof of Evidence

**Town and Country Planning Act 1990
Section 78 appeal against the refusal of planning permission**

Witness: Liz Allen CMLI

Subject of Evidence: Landscape

Appeal: APP/W0340/W/24/3356688

**Site: LAND SOUTH OF SANDHILL, HAMPSTEAD NORREYS
ROAD. HERMITAGE**

**Proposal: 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**

Date: APRIL 2025

Council Reference: 23/00815/FUL

Proof of Evidence

Liz Allen CMLI: Landscape

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1. Introduction

Qualifications and Experience

- 1.1 My name is Liz Allen. I have been a Chartered Member of the Landscape Institute since 1993. I have over 30 years' experience in undertaking Landscape and Visual Impact Assessments (LVIA), within both the private and public sectors. I have also been advising the West Berkshire Council on development within the district for the last 8 years. I have also given evidence at a number of Public Inquiries for the Council, including for gypsy and traveller sites.
- 1.2 I confirm that the evidence which I have prepared and provided for this appeal is true to the best of my knowledge and belief and it has been prepared and is given in accordance with the guidance of the Landscape Institute, my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Purpose and Scope of Evidence

- 1.3 This proof of evidence has been prepared in response of the proposed change of use of land for the formation of 5 Gypsy/Traveller pitches, each comprising of 1 mobile home, 1 touring caravan, and 1 utility building per pitch.
- 1.4 My evidence will address the main landscape and visual impacts of the proposed development on the appeal site and the surrounding area. In summary, I will show this will result in significant and demonstrable harm as follows:
 - The introduction of inappropriate development, including suburbanising elements on the rural character of the North Wessex Downs National Landscape in a highly visible location
 - The loss of and degradation of valued features and qualities which contribute to the rural settlement character of Hermitage

Reason for Refusal

- 1.5 Relevant to this proof of evidence, I will consider the following reason for refusal:

1. *The application site lies in the North Wessex Downs National Landscape. This is specially protected landscape as defined in the NPPF. The development of this site for gypsy and traveller accommodation [5 pitches] will harm the visual character of the area, particularly in relation to the soft transition between the built-up area of Hermitage to the south and open countryside to the north. This is considered to be contrary to the advice in policies ADDP5, CS7 and CS19 in the WBCS of 2006 to 2026 and the advice in para 176 of the NPPF of 2023. It is accordingly unacceptable. It is also contrary to the advice in policy TS3 in the HSADPD of 2017.*

Procedural Matters

1.6 As part of the planning application 23/0815/FUL, the following documents were submitted:

- LVIA (Landscape and Visual Impact Assessment) by Draffin Associates 30th August 2023 (CD1.13, CD1.14, CD1.15)
- Landscape Strategy by Draffin Associates. Drwg No 877/01, August 2023 (CD1.16)
- Existing site plan by WS Planning Architecture Drwg J004472-DD-05 Rev E, August 2023 (CD1.18)
- As Proposed Site Plan, by WS Planning Architecture Drwg J004472-DD-05 Rev F, August 2023 (CD1.29)
- As Proposed Site Plan Detail, by WS Planning Architecture Drwg J004472-DD-07 Rev A, August 2023 (CD1.30)
- Tree protection Plan by David Archer Associates. February 2024

1.7 As part of West Berkshire's processing of planning application 23/0815/FUL, I was contracted by West Berkshire Council to review the submitted LVIA by Draffin. My landscape comments for this LVIA were based on the Landscape Institute's Technical Guidance Note (TGN) 1/20 (10 Jan 2020) *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape Appraisals (LVAs)*. These initial landscape comments are available under CD4.2, which forms Appendix A of the LPA Statement of Case. Section 6 of my PoE also summaries these comments alongside my own assessment where information I consider has been omitted or not adequately provided.

1.8 In preparing this evidence I have also considered the appellant's supporting documents as listed in the Core Documents List.

1.9 My evidence is based on current best practice in accordance with the 'Guidelines for Landscape and Visual Impact Assessment'. Third Edition. 2013(GLVIA3) (CD8.15), the Landscape Institute's Technical Guidance Notes: TGN LITGN-2024-01: Notes and

clarification on aspects of guidelines for Landscape and Visual Impact Assessment 3rd Ed (GLVIA3) (CD8.15), the Landscape Institute's Technical Guidance Note (TGN) 1/20 (10 Jan 2020) Reviewing Landscape and Visual Impact Assessments (LVIA's) and Landscape Appraisals (LVAs) (CD8.16) and the Landscape Institute's Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals (CD8.17)

2. Issue

Policy And Guidance

2.1 I will consider the proposed development in the light of the following landscape and visual aspects of government and local guidance and policy:

- National Planning Policy Framework December 2024 (amended February 2025) - para 7, 8(c), 135 (a, b & c) 187 (a) and 189 (CD8.1)
- Applying the CRoW Act section 85 duty to 'seek to further the purpose' in National Landscapes (AONBs) Briefing November 2024 (CD8.18) and the National Landscape Briefing November 2024 (CD8.19)
- National Design Guide 2021 (CD8.20)
- Planning Policy for Traveller Sites (PPTS) December 2024 Para 27 (CD 8.2)
- West Berkshire Core Strategy (2006-2026) July 2012, Policies: ADPP5, CS7, CS14 and CS19 (CD8.3)
- Housing site allocations DPD (2006-2026) Adopted May 2017 Policy: TS3 (CD 8.5)
- WB Emerging Local Plan - SP2 North Wessex Downs AONB, SP7 Design Quality, SP8 Landscape Character, DM15 Trees, Woodland and Hedgerows and DM20 Gypsies, Travellers and Travelling Showpeople (CD8.9)

National Planning Policy Framework (CD8.1)

2.2 The appeal site lies in the North Wessex Downs National Landscape (Previously AONB), which has the highest status of protection in relation to its landscape and natural beauty. NPPF para 189 requires *great weight should be given to conserving and enhancing landscape in... National Landscapes*. The NPPF also provides the following guidance:

- The importance of protecting and enhancing the natural environment in achieving sustainable development (NPPF para 7 & 8)

- The need to protect and enhance valued landscapes (NPPF para 187 (a) in a manner commensurate with their statutory status
- The avoidance of poor design that fails to improve the character and quality of the area (NPPF para 135 and the National Design Guide 2021)

National Landscape Briefing November 2024 (CD8.19)

- 2.3 This briefing note was provided to explain the duty in The CRoW Act 2000 (section 85) for any actions that might affect National Landscapes. For decisions relating to planning applications, the briefing states that consideration on how the natural beauty of the area might be affected were the proposals to go ahead and whether they align with the AONB Management Plan objectives/principles/policies (CD8.12). This should consider whether this would cause harm to the natural beauty of the area. It also recognises that where harm is identified, enhancements themselves, including biodiversity net gain (BNG) provision are unlikely to be sufficient to align with the duty, which has the dual consideration of conserving and enhancing natural beauty.
- 2.4 The briefing also states...*Ensure a clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g. like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the AONB. Natural England have advised that measures that further the purposes are required in addition to mitigation.*
- 2.5 The briefing also highlights as part of the LPA assessment of a planning application, it should be considered how the applicant has articulated the effect on the National Landscape by the way of a LVIA and how this aligns with the National Landscape Management Plan.

Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes December 2024 (CD8.18)

- 2.6 This states how relevant authorities must now 'seek to further' the statutory purposes of Protected Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purposes. The statutory purposes of National Landscapes are – conserving and enhancing the natural beauty of the area.

National Planning Policy for Travellers (NPPT) (December 2024) (CD 8.2)

- 2.7 Policy B: Planning for traveller sites states that local plans must be prepared with the objective of contributing to the achievement of sustainable development which are consistent with the policies within the NPPF.
- 2.8 Paragraph 27 of the NPPT outlines the matters that local planning authorities should attach weight to when considering applications. These are,
- *effective use of previously development (brownfield), untidy or derelict land*
 - *sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness*
 - *promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children*
 - *not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community*

National Design Guide (NDG) 2021 (CD8.20)

- 2.9 The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. The NDG sets out ten characteristics which outline and illustrate the Government's priorities for well-designed places. The first three characteristics: Context, Identity and the Built Form consider how well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. Well designed places are also integrated into their wider surroundings, physically, socially and visually, with an understanding of landscape character and how developments sit within the landscape.

West Berkshire Core Strategy (2006-2026) July 2012 (CD 8.3)

- 2.10 The policies that are relevant to this appeal and to landscape and visual issues are listed below.
- 2.11 ADPP5 North Wessex Downs AONB (National Landscape): As stated within ADPP5 under the heading of environment: *Recognising the area as a national landscape designation, development will conserve and enhance the local distinctiveness, sense of place and setting of the AONB whilst preserving the strong sense of remoteness, tranquillity and dark skies, particularly on the open downland. Development will respond*

positively to the local context and respect identified landscape features and components of natural beauty.

2.12 CS7: Gypsies, Travellers and Travelling Showpeople: In allocating sites, and for the purpose of considering planning applications relating to sites not identified in the relevant Development Plan Document, a list of criteria will need to be satisfied for sites outside settlement boundaries. The relevant ones which relate particularly to landscape are as follows:

- *Will not materially harm the physical and visual character of the area;*
- *Where applicable have regard for the character and policies affecting the North Wessex Downs AONB (National Landscape).*

2.13 CS14: Design Principles: To that extent as it relates to landscape and visual issues, this policy stipulates that new development, *"...must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area, and makes a positive contribution to the quality of life in West Berkshire. Good design relates not only to the appearance of a development, but the way in which it functions. Considerations of design and layout must be informed by the wider context, having regard not just to the immediate area, but to the wider locality. Development shall contribute positively to local distinctiveness and sense of place.* (my underlining)

2.14 CS19 Historic Environment and Landscape Character: This Policy requires that: ... *In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced the natural, cultural and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:*

- (a) *The sensitivity of the area to change*
- (b) *Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character*

Proposals for development should be informed by and respond to:

The distinctive character areas and key characteristics identified in relevant landscape character assessments

2.15 Housing site allocations DPD (2006-2026) Adopted May 2017: Policy TS3: Gypsy, Traveller and Travelling Showpeople accommodation. Additional to all the relevant

policies within the Core Strategy, as stated within TS3, planning applications will need to ...*Provide a Landscape and Visual Impact Assessment (LVIA) in accordance with the Landscape Institute Guidelines for Landscape and Visual impact Assessment 3rd Edition.2013. This will inform the development design and layout of the site and requirements for green infrastructure.*

West Berkshire Emerging Local Plan (2022-2039 (CD8.9)

- 2.16 SP2 North Wessex Downs AONB (National Landscape) states...*The North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.*
- 2.17 SP7 Design Quality, states ... *New development will be required to strengthen a sense of place through high quality locally distinctive design and place shaping. This will enable healthy place making, creating places that are better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.* Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021).
- 2.18 SP8 Landscape Character, states... *Landscape led development which conserves and enhances the diversity and local distinctiveness of the landscape character of the District will be supported. The natural, cultural, and perceptual components of the character of the landscape will be considered as a whole. Particular regard will be given to:*
- *Its valued features and qualities;*
 - *The sensitivity and capacity of the area to change; and*
 - *Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.*

Para 5.43 states... *The policy makes clear that proposals for development should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA. Depending on the scale and nature of the proposals this will either be a formal Landscape and Visual Impact Assessment (LVIA) typically as part of an Environmental Impact Assessment (EIA) or less formally as a Landscape and Visual Appraisal (LVA). Regardless of the scale of the assessment, it should address both the potential landscape effects and also the potential visual effects that may result from the development. Detailed development proposals will then be expected to respond positively to this assessment to ensure*

they conserve and enhance landscape character by strengthening a sense of place in accordance with Policy SP7

- 2.19 DM1 Residential development in the countryside: As stated sites for gypsies and travellers are an exception, however ... *Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not contribute to the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB*
- 2.20 DM15 Trees, Woodland and Hedgerows, states... *Development which conserves and enhances trees, woodland and hedgerows will be supported.*
- 2.21 DM20 Gypsies, Travellers and Travelling Showpeople: This policy states that... *Permanent Gypsy and Traveller sites and sites for Travelling Showpeople will be developed:*
- c. On sites located in, or well related to, existing settlements; or*
- d. When in rural settings, ensuring the scale of the site(s) do not dominate the nearest settled community, whether singly or cumulatively with any other Gypsy and Traveller, and Travelling Show people sites. Isolated locations in the countryside should be avoided.*
- 2.22 Where possible sites will be on previously developed land. Additionally, site planning will be landscape-led and development will be in accordance with Policies SP7 (design quality) and SP8 (landscape character)

3. Landscape Context and Character

- 3.1 The following national and local landscape character assessments and guidance provide information regarding the area where the appeal site is located. These will inform the suitability of the appeal site under government and local policy and guidance.
- 3.2 The relevant landscape character assessments and design guidance is as follows:
- National Character Areas 129: Thames Basin Heaths (CD8.21)
 - The North Wessex Downs Area of Outstanding Natural Beauty Integrated Landscape Character Assessment (2002) (CD8.22)
 - The North Wessex Downs AONB Management Plan 2019-2024 (CD8.10)
 - West Berkshire Landscape Character Assessments 2019 (WBLCA 2019) (CD8.24)

- Hermitage Design Guidelines and Codes September 2022 (CD8.25)
- Hermitage Neighbourhood Plan 2023-2039 (CD8.8)

National Character Areas 129: Thames Basin Heaths (CD8.21)

- 3.3 The objective of a National Character Area is to cover the broad issues, which although valuable at a strategic level, the three documents covering the National Landscape (The North Wessex Downs Area of Outstanding Natural Beauty Integrated Landscape Character Assessment (2002) (CD8.22) and The North Wessex Downs AONB Management Plan 2019-2024 (CD8.10) and the West Berkshire Landscape Character Assessment August 2019(CD8.24) will provide more detail for the local landscape. Overall, the landscape character of NCA 129 has been the result of low-grade agricultural land resulting in a mosaic of wet and dry heathland, woodland and grassland.

The North Wessex Downs Area National Landscape

- 3.4 The appeal site is located within *Landscape Type 8: Lowland Mosaic* and *Character Area 8A: Hermitage Wooded Commons* of the North Wessex Downs Integrated Landscape Character Assessment (2002) (CD.22). Described as containing a 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.
- 3.5 The key landscape issues for *Character Area 8A* as listed within NWD AONB Integrated Landscape Technical Report (2002), include the loss of hedgerow boundaries, mature hedgerow trees and the poor management of remaining hedgerows. Improvements to the lanes including kerbing, widening, signing and visibility splays can also create a more unsuitable urban character and due to the comparative accessibility, there is also development pressure which can include further suburbanising influences of the built development. Key management requirements for Character Area 8A 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.

North Wessex Downs AONB Management Plan 2019-2024 (CD.8.10)

- The review of the current North Wessex Downs Management Plan is under way with a view to publishing a revised Plan in late 2025. As advised by DEFRA, the NWDNL

Partnership has published a “light touch review statement”, explaining its decision to extend the life of the current Management Plan and listing some priorities it expects to guide the preparation of the revised Management Plan 2025-30. (CD8.23)

3.6 The NWD AONB Management Plan provides a vision and long-term ambitions for the National Landscape. Two of the themes covered within the AONB Management Plan include *Landscape* and *Development*. Key issues under the theme of Landscape with regard to the appeal site with the potential to have significant influence on the National Landscape, include the following:

- *The need to conserve and enhance the small scale, secluded and rural character of the lowland mosaic, including the fragile heathland*
- *Intense pressure for development throughout the AONB and its setting that threatens the character and quality of its landscape and risk merging of small settlements, encroachment by larger settlements and changes to the scale and nature of development boundaries*

3.7 The most relevant landscape policy as listed within the Management Plan (2019-2024) is as follows:

- *LA06 Ensure that all development in or affecting the setting of the AONB conserves and enhances the character, qualities and heritage of the North Wessex Downs landscape.*

3.8 The AONB Management Plan also addresses the theme of development, with a number of key issues listed with the potential to have significant influence on the National Landscape, the ones relevant to the appeal site are as follows:

- *The change of use of land to domestic garden use.*
- *The loss of rural character through suburbanising influences from new development (new fencing, lighting, signage, parking areas, paved footpaths, loss of native hedgerows and creation of new garden areas).*
- *New housing developments on greenfield sites.*

3.9 Relevant development policies as listed within the Management Plan (2019-2024) are as follows:

- *DE 01 Encourage all proposals for new development, redevelopment and re-use to conserve and enhance the natural beauty of the North Wessex Downs. Oppose forms of development that fail to conserve and enhance the character and quality of the AONB and its setting and to make reference to the AONB’s published guidance*

- *DE02 Encourage high standards of design, comprehensive landscaping where required, traditional building styles, energy conservation and innovation that respect historic settlement patterns and the distinctive character of the North Wessex Downs*
- *DE 05 Encourage the consideration of landscape, including historic landscape, impacts at the earliest opportunity in the planning process through preparation of Landscape and Visual Impact Assessment, Landscape and Visual Appraisal and Environmental Impact Assessment reports as appropriate to the location.*

West Berkshire Landscape Character Assessment August 2019 (WBLCA 2019) (CD8.24)

- 3.10 West Berkshire Council do not use local landscape designations, but use a landscape character assessment approach to conserve and enhance the distinctive landscapes of the district in line with national policy. At this detailed local level, the West Berkshire Landscape Character Assessment 2019 provides a comprehensive and up to date landscape character assessment for all land outside defined settlement boundaries. The WBLCA 2019 (Chapter 4) recognises that the condition of the landscape has deteriorated or is to be considered at risk due to a number of factors. One of these factors is the pressure for development; where in rural areas the characteristic small villages and dispersed farmsteads are at risk from more piecemeal development. The cumulative impact of development is an important consideration, as incremental changes when viewed collectively can significantly change the character of a landscape (WBLCA 2019 para 4.6).
- 3.11 As stated within paragraph 1.22, of the WBLCA 2019... *In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:* *b) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.* (my underlining)
- 3.12 The appeal site is located within *Landscape Character Type: Woodland and Heathland Mosaic* and *Landscape Character Area WH4: Cold Ash Woodland and Heathland Mosaic (LCA WH4)*. The landscape character of 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 with guidelines on how this character area can be conserved and enhanced, which is particularly relevant as it is located within the National Landscape.

3.13 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 remanent 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 National Landscape, where the mosaic of ancient semi-natural woodlands, plantations, remnant heathland and open farmland are noted as special qualities relating to this character area. Special qualities are derived from The NWD AONB Management Plan, these are also supplemented by the information contained in the North Wessex Downs AONB Landscape Character Assessment (2002) (my PoE 3.4 – 3.5). 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.

3.14 Detractors for LCA WH4 are also listed, providing an overview of the key aspects which would have a negative effect on the landscape character of the area. A relevant listed detractor for this appeal is 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 the presence of existing structures and in the latter to the screening/containment provided by boundary features.*

3.15 The Landscape strategy for LCA WH4 lists and includes the following requirements (my underlining) which are particularly relevant to the appeal 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.

3.16 As part of the suitability of the appeal 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 above, the appeal site is located within the National Landscape, where fields form part of the varied landscape mosaic and in particular when small fields are located on the edge of settlements, they are valued as part of the adjacent undeveloped landscape character and mark the transition between settlement and countryside.

Hermitage Neighbourhood Plan (HNP) 2023-2039 (CD8.8)

3.17 The HNP represents one part of the WB development plan and should be read alongside West Berkshire Core Strategy (2012) and the HAA DP (2017). The HNP lists a number of objectives, which includes and also highlights the importance of views from the village. The HNP also identifies Furze Hill Recreation Ground and Furze Hill Local Wildlife Site, which references the Recreation Ground as a centre for village activities (para 6.24, page 32) and the Eling Way located to the east of the appeal site as ...very popular and well used travel route (para 6.25, page 33).

Hermitage Design Guidelines and Codes September 2022 (CD8.25)

3.18 Hermitage is described as a rural village with long distance views towards the open countryside (para 2.3 page 17). The B4009 is described as possessing characteristics of a countryside lane along the edges of the village where there are no pavements. Views from the B4009 out to the west are also keyed as important views on Figure 23, (page 26), these views can also be appreciated in the winter from the Hermitage recreation ground to the west of the appeal site.

- 3.19 General design principles are set out within chapter 3.3 (page 28) of the HDG 2022, and state considerations of design and layout must be informed by the wider context, considering not only the immediate neighbouring buildings, but also the landscape and rural character of the wider locality. A list of design principles places a strong emphasis on views, with guidelines including: *Respect the existing pattern of the parish to preserve the local character; Respect the heritage, landscape and key views identified in the parish and Preserve views towards the open countryside as well as views from the countryside towards the village settlement.*

4. Site description and landscape context

- 4.1 The appeal site is located within the North Wessex Downs National Landscape, within open countryside, 55m north from the settlement boundary of the village of Hermitage and adjacent to the east of the B4009 (WB Appendix LAA: Figure LA1, Figure LA2 and Figure LA4). To the south of the appeal site (outside the settlement boundary) is the low-lying bungalow Torcove, to the north the appeal site abuts the large garden of Sandhill House, which is then located a further circa 43m to the north. To the east of the appeal site there is a mature linear woodland which covers the now redundant cutting/embankments of the ex-railway line (Didcot Newbury & Southampton Railway line) these mature trees are also covered by a blanket Tree Preservation Order (TPO). This ex-railway alignment is now known as the Eling Way, a joint footway and cycleway. Beyond this and further to the east is Hermitage Village Recreation Ground. To the west of the appeal site, the B4009 roadside hedgerow marks the appeal site boundary, with open fields further to the west, permitting long open views to wooded skylines, a feature of this area of the National Landscape and identified within the Hermitage Design Guide 2022.
- 4.2 Prior to the unauthorised development, the appeal site (WB Appendix LAA: Figure LA4) originally would have been a linear grass field (dimensions circa 160 x 40m), semi-enclosed by the roadside hedgerow and the linear woodland to the east with an existing field gated access from the B4009 at the southern end. To the north, the appeal site boundary would have been marked by the joint field boundary and garden boundary of Sandhill, which is now marked by a new close boarded fence, it is not clear how this was defined before. To the south, the appeal site boundary with Torcove is marked by a thick evergreen hedge. The appeal site is also slightly elevated to the B4009 and then slowly slopes up across the appeal site to the eastern site boundary. There would have

been views from the adjacent B4009, where the appeal site, as a small grassed field would have formed part of Hermitage's rural context. As such, it can be seen that the appeal site formed a key component in those views of the rural character of the area beyond the settlement, indeed it was not a brownfield or derelict site.

- 4.3 **Conclusion:** The area where the appeal site is located has a good fit with the description of the National Landscape and the local WB landscape character area. The appeal site originally a linear field of grassland, forms part of the mixed mosaic forming part of an intimate rural landscape on the settlement edge of Hermitage. Fields on the settlement edge also enhance Hermitage's rural settlement character, while forming a natural transition to a more open agricultural landscape.

5. The proposal

- 5.1 The proposal will include the following:

- 5 traveller/gypsy pitches. Each one including 1No mobile home, 1no touring caravan, 1No utility building
- Widened vehicle access from the B4009, based on the location of the existing field gate access. The new access will include visibility requirements, including the removal of 20m of treed hedgerow to the north and circa 5m of treed hedgerow to the south to accommodate the proposed 1.5m pedestrian footway
- Internal access road along the western edge.
- For each pitch, an acoustic fence will be erected along the northern boundary, with additional lengths wrapping around the corners (see red line on plan below CD...). This will result in circa 115m of 2.3m high acoustic fencing within the appeal site
- Mitigation measures as proposed by Draffin are set out within my 6.23 of my PoE



Figure LA5: Extract from WS Planning and Architecture Drwg No: J004472-DD-05 Rev A. The red line shows the proposed position of the 2.3m high acoustic noise fence (taken from Noise assessment Report 1510.NIA.00) (CD1.22)

6. Assessment of Draffin's LVIA

- 6.1 The following section forms a summary of my initial assessment of Draffin's LVIA which formed part of the planning application 23/00815/FUL (full text can be viewed within CD4.2).
- 6.2 As part of the planning application and as per the Council's Policy TS3 Detailed Planning Considerations for Travellers Sites, there is a requirement to provide a Landscape and Visual Impact Assessment (LVIA). As per my initial assessment I detailed that the LVIA by Draffin was not a comprehensive assessment as it was not in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd Ed 2013. Draffin's LVIA is deficient in a number of ways (but not limited to) as follows.

A methodology which did not comply with industry standards

- 6.3 Draffin's LVIA included their own methodology as set out within their Appendix C. Overall, the methodology was incomplete and 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 (para 8.8)*, *long term (10.14)*, *eventually (12.01)* and *temporary (12.05)*. 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.

- 6.4 Overall Draffin's LVIA does not evaluate judgements on the susceptibility of the landscape (or appeal site) to accommodate the proposed development or combine them with the value of the landscape receptor in order to ascertain the sensitivity of any receptors, as required by GLVIA3 (Figure 5.1, page 71). The LVIA does not combine judgements on the sensitivity of receptors with the magnitude of the effect, in order to understand the significance of that effect as required by the (GLVIA3 (Figure 5.1, page 71).

Insufficient reference to the National Landscape

- 6.5 Draffin's LVIA references the NWD National Landscape in name only (LVIA para 4.1) No reference to the key characteristics, key issues or management requirements as set out within the *NWD AONB Integrated Landscape Character Assessment Technical Report* (LUC, March 2002) or the *NWD AONB Management Plan 2019-2024*. These are important in understanding the landscape context of the appeal site and as stated within the Management Plan, a requirement (policy DE01 – CD8.10)

Limited reference to the WBLCA 2019

- 6.6 The LVIA referenced the WBLCA 2019, but only in part and referencing only three items (out of 7) from the landscape strategy. Valued features and detractors were also omitted. The omitted sections of the landscape strategy are clearly controversial for the appeal site and should have been included within Draffin's LVIA, they are as follows:

6) Increased suburbanisation *Modern housing along main routes and on adjacent cul-de-sacs, together with street lighting and pavements, has introduced suburban characteristics to some places, particularly where there is less tree cover to mask changes e.g. the southern end of Cold Ash and linear development along the B4009 Long Lane just north of Shaw. Incremental development of the countryside settlements*

is also an issue, including the enlargement of curtilages, security lighting, entry gates etc.

- 6.7 As stated, linear development increases suburbanisation, especially where there is a lack of tree cover. The removal of the roadside hedgerow for visibility splays will also make the linear development of the appeal site more open to the wider landscape and views.

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. However, farm buildings, even when development has left them adjacent to settlement edges, contribute to rural character when they retain a relationship with farmland; and small enclosures, even when used as paddocks, form a transition between settlement and countryside that can contribute positively to landscape character, particularly when they retain a relationship with a historic settlement core.*

- 6.8 The appeal site is a small field on the edge of the settlement of Hermitage which provides transition to open countryside. Developing this field will impact on Hermitage's rural settlement character.

8) Increased traffic on the rural lane network *There is pressure on the network of rural lanes, many of which are single track with few passing places. Heavy traffic on narrow lanes has a significant impact on countryside character, but standard highway improvements such as widening, kerbing, signage and broad visibility splays can create a more urban character which is out of context as well as encourage greater usage.*

- 6.9 The need for visibility splays and a pedestrian footpath requiring the removal of over 20m of hedgerow to the north and the complete section of hedgerow to the south, will result in opening up of views into the proposed development from the adjacent B4009.

Baseline conditions of the appeal site for the LVIA

- 6.10 Draffin's LVIA makes no analysis of the value attributes or characteristics of the appeal site (pre-development) as an undeveloped grass field, on the edge of Hermitage and, its overall contribution to the local landscape character within this area of the North Wessex Downs National Landscape. Furthermore, as incorrectly stated within Draffin's LVIA para 7.1 *...physical landscape receptors including vegetation and landform are not directly affected by the proposal and my assessment has thus concentrated on visual receptors.* This is clearly not factually true as the proposed development has already resulted in a direct loss of grassland, hedgerow, trees and will change the landscape character of the field, from a field of grassland to a field dominated by a spine road,

115m of a 2.3m high acoustic fence, mobile homes, caravans, single storey buildings, vehicular parking and general domestic garden paraphernalia. Draffin's LVIA provides a landscape impact assessment (para 8.7 – 8.9) which has to be based on using the current unauthorised development as the baseline, as Draffin states... *The cumulative effect will deliver a proposal of short term slightly adverse landscape impact particularly at the western driveway entrance to the traveller's layout during new caravan installation. This will diminish with the new landscape structure establishment and create a slightly beneficial landscape impact subject to appropriate landscape management (para 8.8).* From this statement it has to be stating that the mitigation measures will deliver landscape improvements from the present situation (containing the unauthorised development) of the appeal site. Based on this approach, I agree the landscape mitigation measures will bring some limited improvements for the current situation but will not compensate for the overall proposal, with the landscape effect remaining adverse which will be significant for this area within the National Landscape.

Comments on Draffin's visual assessment

6.11 The LVIA provided a visual impact assessment (para 8.10), which is flawed as follows:

- The LVIA as part of the visual assessment has not considered the change in views from the baseline (grass field) to the proposed development. As set out within the GLVIA3, Figure 6.1 (page 99) the assessment needs to state the existing view (the baseline), the sensitivity (combining susceptibility and value) of the receptor, the magnitude of change and resulting effect at Year 1, and Year 15
- The visual assessment was undertaken within the summer months, when trees were in full leaf which forms a more enclosed (and screened) landscape; a winter assessment should have also have been provided when the landscape was more open, or if that was not possible, at least acknowledging or predicting winter views
- The photos representing the viewpoints did not comply with the Landscape Institute's Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals
- Missing visual receptors, As the visual assessment was only undertaken within the summer months, more open views within the winter months have now been identified, however within the LVIA these were omitted (from the recreation ground to the east)
- The visual assessment was also undertaken without acknowledging the removal of up to 25m of hedgerow to accommodate the sight lines at the appeal site entrance and the removal of the hedgerow to the south of the entrance to accommodate the 1.5m wide pedestrian pavement. The removal of this length of hedgerow makes the appeal site more open to views from the adjacent B4009
- The visual assessment was also undertaken without acknowledging the required 2.3m high acoustic fence

- The LVIA does not distinguish between the sensitivity of visual receptors, which is a function of its susceptibility to change and the value attached to the view, as set out in GLVIA321, which states, “6.33 *The visual receptors most susceptible to change are generally likely to include:* •
 - *Residents at home (but see Paragraph 6.36);*
 - *People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;*
 - *Communities where views contribute to the landscape setting enjoyed by residents in the area.*
 - *Travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.*
- The visual assessment also relies upon the soft mitigation measures which will not only be difficult to achieve (see comments on Draffin’s mitigation measures within my sections 6.22) but also take an unacceptable time to mature for a site within the National Landscape.

6.12 My Figure LA3 WB Appendix LAA, Zone of Theoretical Visibility (ZTV) and photo viewpoints illustrates the wider area I have identified as having the potential for visual effects. These include additional viewpoints from the adjacent recreation ground and the property to the north: Sandhill. My visual assessment is set out within a table format within my WB Appendix LAB following my Methodology as set out within WB Appendix LAC. Below I have provided a summary of my visual assessment, alongside comments on Draffin’s views with reduced sized photos for reference (the correct sized photos can be viewed within my WB Appendix LAA).

6.13 Viewpoint LA1: Draffin’s Viewpoints 1-4 – Hampstead Norreys Road (B4009) – entrance driveway. I disagree with Draffin’s assessment, as the change in views from this location due to the requirement for sight lines will result in the removal of 20m of roadside hedgerow to the north of the site entrance and the removal of the section of hedgerow to accommodate the pedestrian path to the south. This will result in direct views into the appeal site from the adjacent B4009/Hampstead Norreys Road

6.14 Originally a view of the roadside hedgerow and a narrow field gateway entrance into the grassed field (the appeal site). The B4009 has been assessed as having a medium sensitivity, a higher sensitivity than normal due to its location within the National Landscape. The change in view will result in a major/moderate adverse visual effect with the view now dominated by the 2.3m high acoustic fencing, Mobile homes, caravans,

utility buildings, parked vehicles and garden paraphernalia. The mitigation measures after 15 years will slightly reduce this effect, but not significantly.



Viewpoint LA1: Looking north towards the appeal site and existing site entrance from Hampstead Norreys Road (B4009). (March 2025)

6.15 Viewpoint LA2: Viewpoint 5-8 – Hampstead Norreys Road (B4009) – roadside context.

As shown below with my Viewpoint LA2, the existing boundary hedgerow is particularly intermittent in its form, permitting a view into the appeal site which also forms part of a number of views as a sequence from the B4009. At the northern end section, a close boarded timber fence has recently been installed as part of the recent occupation blocking views into the appeal site (not shown below.)



Viewpoint LA2: Looking east into the appeal site from Hampstead Norreys Road (B4009). The gappy roadside hedgerow would have allowed views into the field, with the mature trees visible beyond. This view is now dominated by the unauthorised development. (March 2025)

6.16 Originally a view of the roadside hedgerow with some views into the grassed field (the appeal site). The B4009 has been assessed as having a medium sensitivity, due to its location within the National Landscape. The change in view will result in a major/moderate adverse visual effect with open views now dominated by the 2.3m high acoustic fencing, mobile homes, caravans, utility buildings, parked vehicles and garden paraphernalia. The mitigation measures after 15 years will slightly reduce this effect but not significantly.

6.17 Viewpoint LA3: Viewpoints 13-16 Eling Way: This recreational path is set in an ex-railway cutting. The section of railway cutting adjacent the appeal site is not as deep at the southern end compared to the northern end. I agree with Draffin's LVIA, that any changes within a certain width along the eastern edge of the appeal site will be visible against the skyline in particular caravans, tall structures as shown within the photo below (Viewpoint 3).



Viewpoint LA3: Looking west towards the appeal site from the multi recreational path: Eling Way. The proposed development within the eastern area of the appeal site will be visible. (March 2025)

6.18 Viewpoint 3 would have originally been a simple rural view through woodland to a skyline with no buildings or structures, adding to the rural character and amenity value of the Eling Way. The sensitivity of the Eling Way would be assessed as high, due to it being a footway and cycleway within the National Landscape, as viewers would have an interest within their surroundings. The magnitude of change would be assessed as medium-high, as the proposed development would result in the introduction of elements considered to be largely uncharacteristic when set within the attributes of the view. This will result in a major/moderate adverse visual effect, reducing to a minor adverse visual effect by Year 15 summer views, mainly due to the intervening woodland being in leaf, rather than the success of any proposed mitigation measures within the appeal site.

6.19 Viewpoint LA4: Draffin did not provide any viewpoints from the Hermitage Village Hall Recreation Ground. This is a well-used area and is referenced within the Hermitage Neighbourhood Plan. As shown below, there are winter views of the unauthorised development within the appeal site, which has replaced the original view of the small grass field.



Viewpoint LA4: Looking west over the Eling Way to the appeal site. The unauthorised development replaces a view of a grass field as shown (March 2025)

6.20 The existing views from the Recreation Ground would have been a series of framed views through trees to the appeal site which would have been visible as a small grass field enclosed by the B4009 roadside hedgerow and the open landscape beyond, all adding to the rural amenity value of the recreational ground. The sensitivity of this receptor would be assessed as high as the viewers would have a proprietary interest and prolonged viewing opportunities of the landscape. The magnitude would be medium, as the change only makes up a small part of the view, however as shown above will still be clearly visible. By Year 1 (winter): this will result in a moderate adverse visual effect and Year 15 (summer) a minor adverse visual effect mainly due to the density of intervening vegetation in leaf within the summer months rather than the proposed mitigation measures.

6.21 Views from Sandhill: From the first-floor windows from the property of Sandhill (north of the appeal site) there are views across the whole of the appeal site. The change in views will be from a grassed field enclosed by trees and hedgerow to an area dominated by the 2.3m high acoustic fencing, caravans, mobile homes, utility buildings, parked cars and garden paraphernalia. The susceptibility of the views from Sandhill would be medium, with the value of these views assessed as high resulting a medium/high sensitivity of this receptor to change. The magnitude of change will be high, resulting in

at least a major/moderate adverse visual effect at year 1. As there are a proposed line of trees and hedgerow along the northern appeal site boundary, by year 15, especially within the summer months, this could provide some screening, however there is also a proposed 2.3m high acoustic fence at this location which would affect the planting conditions and success of these proposed mitigation proposals. This will also result in the loss of this once open rural view.

6.22 **Conclusion:** Although the Zone of Theoretical Visibility is limited to a small area, there are a high number of well used public routes and locations in close proximity where the appeal site and proposed development will be visible from. As these locations are set within the National Landscape, the value of these views will be higher resulting in a major/moderate adverse visual effect on views from the adjacent B4009, Sandhill and the Eling Way. The proposed development would result in changes to this view and the enjoyment of that view, so that the proposed development dominates the view. It would also introduce many intrusive or incongruous elements that would harm the appearance and scenic quality of the view. By Year 15, within the summer months the effect on the views from the Eling Way and Recreation Ground will be reduced, due to the leafing up of the intervening vegetation, not any proposed mitigation measures. However, views of the proposed development from the B4009 will persist due to the loss of hedgerows as the result of sight lines and the proposed pedestrian footpath, which will leave the proposed development openly visible until any of the limited internal planting establishes. Overall, the appeal site is within a visible location on the settlement edge of Hermitage which will also have an adverse landscape effect on Hermitage's settlement rural edge character.

Evaluation of Draffin's mitigation measures

6.23 As stated within the National Landscapes Association Briefing November 2024, there should be a clear differentiation between any proposed measures that seek to mitigate or compensate for harm (e.g. like-for-like replacement), and those that further the conservation and enhancement of the natural beauty of the National landscape. Natural England have advised that measures that further the purposes are required in addition to mitigation. Draffin only proposed mitigation measures, with no clear differentiation from measures to also further the conservation and enhancement of the National Landscape. Draffin's Proposed Landscape Strategy Drwg 877/01 (August 2023) (CD1.16) included the following mitigation measures and are as follows:

- For each pitch, a mixed native hedgerow is proposed, with a band of native meadow grass at the base
- The existing roadside hedgerow will be infilled with mixed native species and with a meadow margin (although as now to accommodate sight lines and the pedestrian path 25m will be removed)
- Groups of three trees are proposed on corner of each pitch
- Tree planting along the eastern boundary, southern and northern boundary

6.24 All the proposed planting will be native, which will include a high percentage of deciduous plant species.

6.25 Essentially, as the change in landscape character of the appeal site will result in the permanent adverse landscape effect on the character of a small grassed field, a key valued feature of this area of *LCA WH4: Cold Ash Woodland and Heathland Mosaic*, it will be fundamentally impossible to mitigate this change.

6.26 The mitigation measures do not reference or comply with the key requirements for the *Character Area 8A: Hermitage Wooded Commons* within the NWD National Landscape or comply with the policies as set out within the NWD National Landscape Management Plan. Additionally, the mitigation measures also do not align with the landscape strategy as set out within the WBLCA 2019 for *LCA WH4... Cold Ash Woodland and Heathland Mosaic*.

6.27 Although the mitigation measures are in part commendable for a generic site, they will not achieve the desired effect as set out within Draffin's LVIA. Furthermore, as required by the National Landscapes Association Briefing November 2024 they do not further the conservation and enhancement of the natural beauty of the National Landscape. More detailed comments are as follows:

- Eastern appeal site boundary: The proposed treatment along the eastern boundary of the appeal site have not taken into account the existing extensive tree canopies, which will create unsuitable growing conditions as being shaded and dry. The extent of these tree canopies is illustrated within David Archer Associates Tree protection Plan and the proposed site plan by WS (CD1.29). This will result in a poorly formed hedgerow which will not significantly reinforce the proposed *boundary screen* as stated within Draffin's LVIA (para 10.10).

- Western appeal site boundary: Again, planting within the existing hedgerow will be difficult to achieve good growth due to the dry and shaded conditions. Plants if they do survive will be slow to grow leaving this hedgerow permanently gappy. Additionally, Draffin's Landscape Plan and the Tree Protection Plan has not taken into account the required sight lines for the appeal site entrance and pedestrian path.
- Northern and southern appeal site boundary: For the proposed trees and hedgerows at the southern end (adjacent Torcove) of the appeal site, if well maintained and managed should grow successfully. However, due to the requirement for a proposed 2.3m high acoustic fence along the northern appeal site boundary, this will make growing conditions difficult, especially if the plants are located to the north of this fence, as this will create very shaded conditions.
- Central appeal site: The hedgerows and individual trees proposed along the individual pitch boundaries will be as shown on Draffin's landscape strategy planted adjacent the proposed 2.3m high acoustic fence (my Figure LA5). It will not be possible for good plant growth to plant on the northern side of the acoustic fence and on the southern side in-between the mobile home and the acoustic fence. Therefore, due to the unsuitable growing conditions as result of the acoustic fence, the internal appeal site mitigation measures as described by Draffin will not be achievable.
- Meadow grassland: Any proposed grassland within the pitches, will be used as a garden area. It is therefore impractical to plant anything except a robust amenity grassland mix, defiantly not a mix which is proposed to be managed fully for conservation or biodiversity and as per Draffin's landscape strategy also only cut twice a year.
- As all the proposed tree and shrub planting will be native, this will mainly be deciduous plants which within the winter will lose their leaves reducing their screening abilities.

6.28 **Conclusion:** As my visual assessment has shown the appeal site will be visible from a number of visual receptors including the adjacent B4009 (Hampstead Norreys Road), Sandhill, the Eling Way and the Recreational Ground. Visible on the settlement edge, where the original appeal site's landscape character contributed to the rural character

of Hermitage. The proposed mitigation measures will not be robust enough to significantly reduce the visual effect on these sensitive visual receptors. Any proposed mitigation planting would also take an unacceptable amount of time to establish, leaving views open to the proposed development for a number of years. Also, it will be impossible to fully mitigate the open access and associated visibility splays required into the appeal site, where the proposed development will continually be visible. The development proposals will result in major/moderate adverse visual effect on a number of users, especially on users of the B4009 a major approach road into Hermitage for locals and visitors to the National Landscape. A major/moderate adverse visual effect would result in changes to the view and the enjoyment of that view by visual receptors so that the proposed development dominates the view. It would introduce many intrusive or incongruous elements that would harm the appearance and scenic quality of the view. Overall, as shown the proposed development will be visually prominent, suburban in character which will be considered significant and important in conjunction with the adverse effects on the Landscape features of the appeal site and surrounding area.

7. Landscape Assessment of the Scheme

- 7.1 As the appeal site is set within the National Landscape, the bench mark for any new development is for it to conserve and enhance the landscape, in other words, protect and maintain the special qualities, valued features and key characteristics of the National Landscape.
- 7.2 The development proposals will be assessed on the following receptors. Detailed comments on the effect on the following receptors can be found within my WB Appendix LAB - Visual Impact and Landscape Impact Tables.
- Landscape features, grass, hedgerow and trees
 - Appeal site character
 - Surrounding landscape character
 - Hermitage settlement edge character
 - North Wessex Downs National Landscape
Landscape Type 8: Lowland Mosaic
Character Area 8A: Hermitage Wooded Commons
 - WBLCA 2019

LCT WH Woodland and Heathland Mosaic

LCA WH4: Cold Ash Woodland and Heathland Mosaic

Direct impacts on landscape features, appeal site landscape character and settlement edge character (see WB Appendix LAB Table 1, 2 & 3)

- 7.3 The development proposals will result in a direct loss of a small field of grassland, a length of hedgerow and a tree, all valued features which contributes to the NWD National Landscape and rural character of the settlement Hermitage. Furthermore, the development proposals will also have a permanent substantial adverse landscape effect on the appeal site's landscape character, changing from an open field to an area dominated by the five pitches including the 2.3m high acoustic fence, mobile homes, static caravans, utility building, hardstanding and garden areas all suburban in character. Overall, as the development proposals cannot be successfully mitigated, this will result in a permanent change to the surrounding rural landscape and settlement edge character of Hermitage, resulting in major adverse landscape effects. The Impact on the National Landscape and local landscape character areas are dealt with separately and as follows:

Impact on the North Wessex Downs National Landscape: Landscape Type 8, Character Area 8A: Hermitage Wooded Commons (CD8.22)

- 7.4 All landscapes within the National Landscape are subject to the same level of protection. The relevant landscape character assessments acknowledge the presence of the M4, but the strategies and guidance still support the need to conserve and enhance the quiet rural character of the area; to avoid localised visual intrusion; to prevent any development not in keeping with the area; and to avoid detractors and suburbanising features extending further into the undeveloped areas of the National Landscape.
- 7.5 The impact on the North Wessex Downs National Landscape was also assessed by whether the development proposals conserve and enhance the landscape and are as follows:
- 7.6 Landscape Type 8: Lowland Mosaic and Character Area 8A: Hermitage Wooded Commons. The development proposals will result in a loss of a small field of grassland and a length of treed hedgerow, as per the NWD AONB Management Plan this will not converse and enhance the small scale, secluded and rural character of the lowland mosaic by the loss of these valued features. The proposed development will also bring suburbanising influences on the settlement edge of Hermitage, extending development

as ribbon development out into the wider open countryside and harming the development boundary at this location. Collectively the development proposal will result in a major adverse landscape effect which will cause permanent harm.

Impact on LCA WH4 Cold Ash Woodland and Heathland Mosaic. (West Berkshire Landscape Character Assessment 2019 (CD8.24))

- 7.7 Following the guidance of the WBLCA 2019, it is recommended that a user's guide (WBLCA 2019 para 1.5, page 1) is followed to assess proposed development within each LCA, see Figure LA6 below. This approach is set out within Appendix 5 of the WBLCA 2019 which states...*The LCA forms a sound evidence base to conserve and enhance the varied character and valued attributes of West Berkshire's landscape when considering new development or land uses – and to pursue opportunities to enhance and strengthen the local distinctiveness of West Berkshire's landscape.*
- 7.8 The user's guide addresses the potential effect of the proposals on the identified landscape character area and its key characteristics, valued features and qualities, whether the proposals exacerbate any identified detractors and whether the proposals comply with the landscape strategy. The findings of this assessment are set out within my Table 5 of the WB Appendix LAB of my PoE.
- 7.9 As detailed within my Table 5, the first question asks whether the development proposals will contribute to the landscape strategy for LCA WH4. As I have shown the development proposals will not conserve and enhance the National Landscape, will cause a further loss and decline in boundary hedgerows and will also have an adverse landscape effect on the rural settlement character of Hermitage, by adding ribbon development on a key access road, within a small field which is also valuable for the transition between settlement and countryside.
- 7.10 The second question asks whether any key characteristics will be affected by the proposals. The appeal site as a small field will have its landscape character adversely effected by suburbanising features. Additionally, as a requirement for sight lines and the pedestrian path, 25m of hedgerow will be required to be removed. Treed hedgerows also contribute to the wooded character of the area, the loss of these hedgerows will, open up the appeal site to the wider landscape and dilute the wooded settlement edge character of Hermitage at this location.

7.11 The third question asks will the proposals adversely affect any of the valued features and qualities or exacerbate any of the detractors? if so which ones. A key valued feature of the appeal site is that it is set within the National landscape. Development on the appeal site will not only extend development out into the wider open countryside, but result in the loss of a key landscape feature of the lowland mosaic landscape character. This will not conserve and enhance the National Landscape. A key landscape detractor listed is the loss of gradation between settlement and countryside, by the loss of a small field located on the settlement edge, will exacerbate an identified detractor.

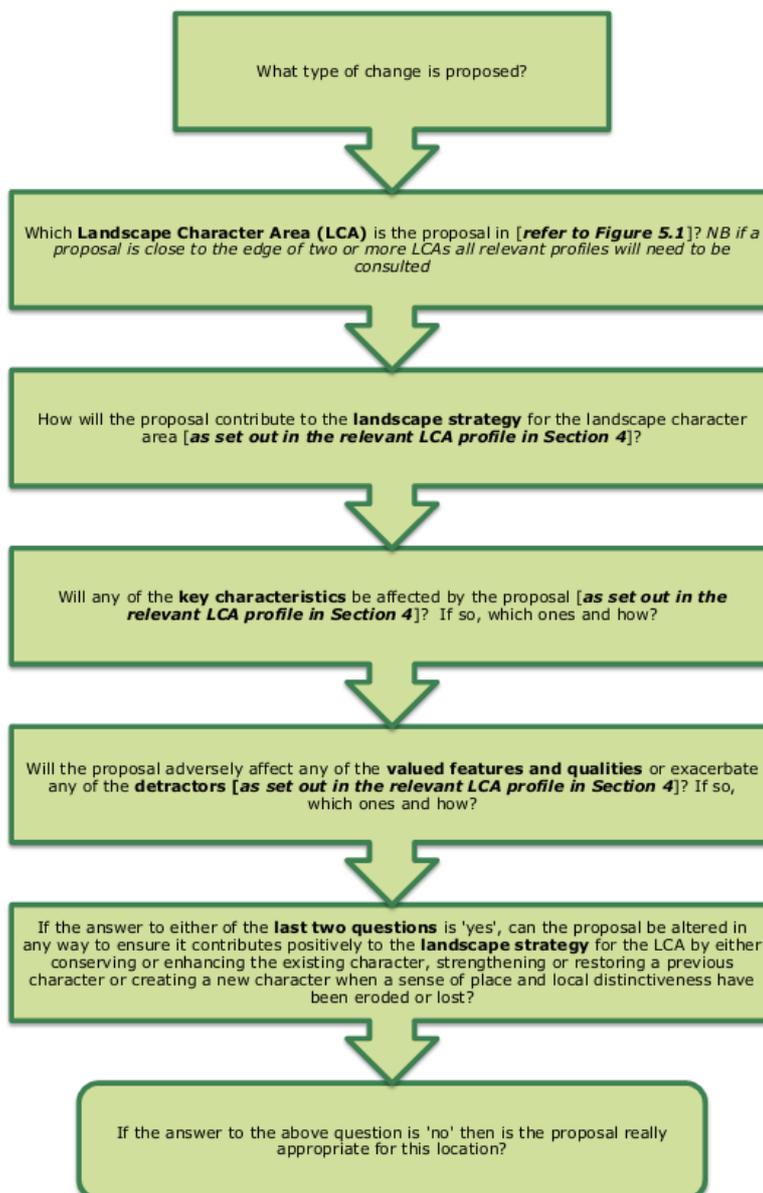


Figure LA6: Extract from WBLCA 2019 Appendix 5 (CD8.24)

- 7.12 The penultimate question of Table 5 asks if the answer to either of the last questions on valued features and qualities and detractors is yes, can the proposals be altered in any way to ensure the proposal contributes positively to the landscape strategy for this LCA? Table 5 then states this can be achieved by either conserving or enhancing the existing character, strengthening or restoring a previous character or creating a new character when a sense of place and local distinctiveness have been eroded or lost. As I have shown within my proof none of these options can be successfully achieved.
- 7.13 As per the assessment, in summary the development proposals will have an adverse landscape effect on the key characteristics of *LCA WH4 Cold Ash Woodland and Heathland Mosaic*. As detailed within the assessment undertaken following Appendix 5 of the WBLCA 2019, the development proposals will not contribute to the landscape strategy, will have an adverse effect on the key characteristics of this area, harm valued features and qualities and exacerbate an identified detractor. This LCA is also an accessible landscape providing direct access to the countryside from Hermitage. The Eling Way which is located to the east of the appeal site provides a well-used multi recreational path, views from this path will be degraded by the proposed development. Overall, the proposed development will have a major adverse landscape effect on *LCA WH4 Cold Ash Woodland and Heathland Mosaic*, which cannot be mitigated.
- 7.14 Lighting: No information has been provided on any lighting proposals. The proposed development will inevitably result in new lighting features forming an obvious presence in the locality, including from the mobile homes, vehicular movements and potential outdoor lighting. Some lighting can be controlled by condition, but it is likely to be visible, even with mitigation in place. Any lighting on the appeal site will extend light pollution further into the countryside of the National Landscape.

8. Assessment against National and Landscape Policy

- 8.1 The purpose of the planning system as stated within the NPPF is to contribute to sustainable development (para 7), with an environmental objective (para 8(c)) to protect and enhance our natural, built and historic environment. Chapter 12 of the NPPF concerns itself with well-designed places, (para 135) stating that decisions should ensure that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; and are also sympathetic to local character

and history, including the surrounding built environment and landscape setting. Chapter 15 of the NPPF states that para 187. *Planning policies and decisions should contribute to and enhance the natural and local environment by: (a) protecting and enhancing valued landscapes.* Para 189 goes on to state *Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues.*

8.2 National Landscapes Association Briefing November 2024 (CD8.19) This new government advice requires all proposed development within the National Landscape to further the conservation and enhancement of the natural beauty of the National Landscape. As I have shown within my PoE the proposed development does neither, and will result in permanent harm.

8.3 Planning Policy for Traveller Sites (December 2024) (CD8.2) Policy C: Sites in rural areas and the countryside state within para 27 that local planning authorities should attach great weight to the following matters:

- *a) effective use of previously developed (brownfield), untidy or derelict land.*
- *b) sites being well planned or soft landscaped in such a way as to positively enhance the environment and increase its openness;*
- *c) promoting opportunities for healthy lifestyles, such as ensuring adequate landscaping and play areas for children; and:*
- *d) not enclosing a site with so much hard landscaping, high walls or fences, that the impression may be given that the site and its occupants are deliberately isolated from the rest of the community.*

8.4 As I have shown, the appeal site was a greenfield site, not untidy or derelict land. The proposed development as I have evidenced will not positively enhance the environment of the appeal site. The proposed development is also visible from the surrounding landscape, which cannot be successfully mitigated to enhance the environment or to increase its openness. The appeal site is also set within the National Landscape which goes beyond just requiring mitigation measures, but also requires all proposals to conserve and enhance the landscape. A stretch of close boarded fencing as part of the unauthorised development has already been erected at the northern end of the appeal site and part of the western boundary. It is possible if this appeal was allowed, other close boarded fencing will be installed along the appeal site. As shown the proposed development has not met the criteria of this policy.

8.5 **The National Design Guide 2021 (8.20)** provides guidance for achieving... *beautiful, enduring and successful places* (NDG front cover). The guidance states that well-designed new development responds positively to the features of the site and the surrounding context by enhancing positive qualities and improving negative ones. Well-designed development proposals are also shaped by an understanding of their landscape context, this understanding can be demonstrated by the developer completing an LVIA or sufficient landscape analysis. As I have shown the accompanying LVIA as part of the planning application, omitted the key issues of addressing sites within the National Landscape. Additionally, under the headings of good design: Context, Identity and the built form, I consider the proposed development will not respond positively to the features of the site itself and the surrounding context partly due to the dimensions of the appeal site, and the fact any proposed development on the appeal site will result in and will be visible as ribbon development, which will result in disproportionately extending development out into the wider National Landscape.

West Berks Core Strategy (2006-2026) DPD (CD8.5)

8.6 **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 proposed development will damage the rural settlement edge character of Hermitage, by introducing elements which are suburban in and encroach into the wider National Landscape. Furthermore, the appeal site is linear in shape, on a main approach road to Hermitage and will therefore be highly visible to a large number of visitors and travellers passing through the National Landscape. The proposed development will not conserve and enhance the special qualities, valued features and key characteristics of the National Landscape, but will cause permanent harm and damage beyond repair. The proposal is therefore in conflict with Policy ADPP5.

8.7 **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 proof, the proposed development will harm the physical and visual

character of the area and in particular will not conserve and enhance the National Landscape. The proposal is therefore in conflict with Policy CS7.

8.8 **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 North Wessex Downs National Landscape *Character Area 8A: Hermitage Wooded Commons and West Berkshire landscape Character 2019: WH4 Cold Ash Woodland and Heathland Mosaic*. 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*. As I have evidenced within my proof, the appeal site due to its location near the edge of a settlement and within a very visible location, will not conserve and/or enhance the landscape character of this area, but will cause irreversible and permanent harm. As I set out within my chapter 7 (para 7.7 - 7.14) the development proposals have also not met the requirements of the landscape strategy for the West Berkshire Landscape Character Assessment 2019. The proposal is therefore in conflict with Policy CS19.

8.9 **Policy 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. A non-compliant LVIA was provided. The proposed scheme will result in over 80% of the appeal site being hard landscaped, the site boundary hedgerow will also be reduced in length; although hedgerows and areas of meadow grass have been proposed as part of the mitigation proposals, these will not be effective in retaining the landscape character of the site from being predominantly suburban.

West Berkshire Emerging Local Plan (2022-2039 (CD8.9)

8.10 SP2 North Wessex Downs AONB (National Landscape) states...*The North Wessex Downs Area of Outstanding Natural Beauty (AONB) will have appropriate and sustainable growth that conserves and enhances its special landscape qualities*. As I have shown the proposed development does not conserve and enhance the National

Landscape's special landscape qualities, but will cause permanent harm, therefore the proposal is in conflict with this policy.

8.11 SP7 Design Quality, states ... *New development will be required to strengthen a sense of place through high quality locally distinctive design and place shaping. This will enable healthy place making, creating places that are better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.* As I have evidenced within my PoE, the proposed development has made no reference to any guidance as set out within the NWD AONB (National Landscape) Management Plan or the NWD AONB Integrated Landscape Character Assessment (2002) and then how the proposals will conserve and enhance the National Landscape. As the proposed development has not responded positively to both national and local design guidance, this has resulted in a proposed development which degrades the landscape and is therefore in conflict with this policy.

8.12 SP8 Landscape Character, requires development to conserve and enhance the diversity and local distinctiveness of the landscape character of the district, where particular regard will be given to:

- *Its valued features and qualities;*
- *The sensitivity and capacity of the area to change; and*
- *Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.*

8.13 As I have evidenced within my proof, the National Landscape is a valued landscape and small fields are a valued feature and quality of this landscape. Due to the appeal site's location close to Hermitage's settlement edge, this is a sensitive landscape, where small fields provide a transition to the wider open countryside. Furthermore, the appeal site is also a sensitive site due to its visibility adjacent one of the main approach roads to Hermitage, whereby due to its linear shape, the proposals will result in ribbon development; which will extend development dis-proportionately into the countryside and the National Landscape.

8.14 As I have shown the appeal site in terms of its location, is not a suitable site for the proposal. Furthermore, due to the site requirements for visibility splays, pedestrian access, acoustic fencing and the 5 pitches each containing a mobile home, caravan and

a utility building will result in permeant harm to Hermitage's settlement form, pattern and character.

- 8.15 As I have detailed within my PoE, the submitted LVIA had not adequately addressed the visual and landscape effects of the proposed development and lacked essential information as an LVIA to make an informed assessment.
- 8.16 Therefore, based on the requirement for proposed development to conserve and enhance the diversity and local distinctiveness of the landscape character of the district, this proposal is in conflict with this policy.
- 8.17 DM1 Residential development in the countryside: As stated sites for gypsies and travellers are an exception, however ... *Planning permission will not be granted where a proposal harms or undermines the existing relationship of a settlement within the open countryside, where it does not contribute to the character and distinctiveness of the rural area, including the special qualities and natural beauty of the landscape of the AONB.* As I have shown the proposal will harm Hermitage's relationship and rural character within the open countryside. Additionally, I have illustrated due to the size, shape, scale, design and requirements of the proposal, this will not contribute to the character and distinctiveness of this area within the National Landscape. The proposal is therefore in conflict with this policy.
- 8.18 DM15 Trees, Woodland and Hedgerows, states... *Development which conserves and enhances trees, woodland and hedgerows will be supported.* As I have illustrated within my POE, the proposal will result in the loss of over 25m of hedgerow. Therefore, the proposal is in conflict with this policy.
- 8.19 DM20 Gypsies, Travellers and Travelling Showpeople: This policy states that... *Permanent Gypsy and Traveller sites will be developed: on sites located in, or well related to, existing settlements; or when in rural settings, ensuring the scale of the site(s) do not dominate the nearest settled community, whether singly or cumulatively with any other Gypsy and Traveller, and Travelling Show people sites. Isolated locations in the countryside should be avoided.* The appeal site is not in an isolated location, but on the settlement edge of Hermitage. The appeal site is also greenfield and not previously developed land. Although the scale of 5 pitches could be considered small it will still need to be in accordance with policies SP7 (design quality) and SP8 (landscape

character). As have shown the proposal does neither, therefore the proposal is in conflict with this policy.

8.20 **NPPF (2024) (CD 8.1)**. As stated for achieving sustainable development (para 8c): *an environmental objective - to protect and enhance our natural, built and historic environment*. As stated within Chapter 12 (para 135) – achieving well-designed places... *decisions should ensure developments are sympathetic to local character and history* and Chapter 15 (para 187) which states... *Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes... (in a manner commensurate with their statutory status or identified quality in the development plan)*. Additionally (para 189) great weight should be given to conserving and enhancing landscape and scenic beauty in... *National Landscapes which have the highest status of protection in relation to these issues*. As shown the proposed development will not comply with the NPPF with a proposed development which will result in significant and demonstrable harm on the following landscape attributes as follows:

- Permanent harm to the National Landscape with development which will not conserve and enhance the special qualities of this designated landscape
- The loss of and degradation of valued features and qualities which contribute to the rural settlement character of Hermitage
- Introduction of ribbon development in an area of open countryside within the National Landscape; along a main road into Hermitage which will be visible for a high number of people and visitors

9. Conclusion

9.1 My Proof of evidence has shown that development on the appeal site will result in significant and demonstrable harm to the character, appearance and landscape value of this area of open countryside. The appellant has also not submitted an adequate landscape assessment or appraisal of the impact the development might have on the landscape and local views. Overall, the proposed development due to its location and proposed suburban character will result in damage to the rural settlement edge character of Hermitage, and will subsequently not conserve or enhance this area within

the North Wessex Downs National Landscape, but will cause permanent harm. The proposals are therefore contrary to the NPPF (December 2024, amended February 2025) paras, 7, 8(c), 135 (a, b & c), 187 (a), 189; National Planning Policy for Travellers (NPPT) para 27; Local Plan Landscape Policies: ADPP5, CS7, CS14 and CS19; Housing Site Allocations DPD (2006-2026) 2017 Policy TS3; WB Local Plan Review Policies, SP2, SP7, SP8, DM15 and DM20.

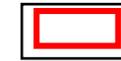
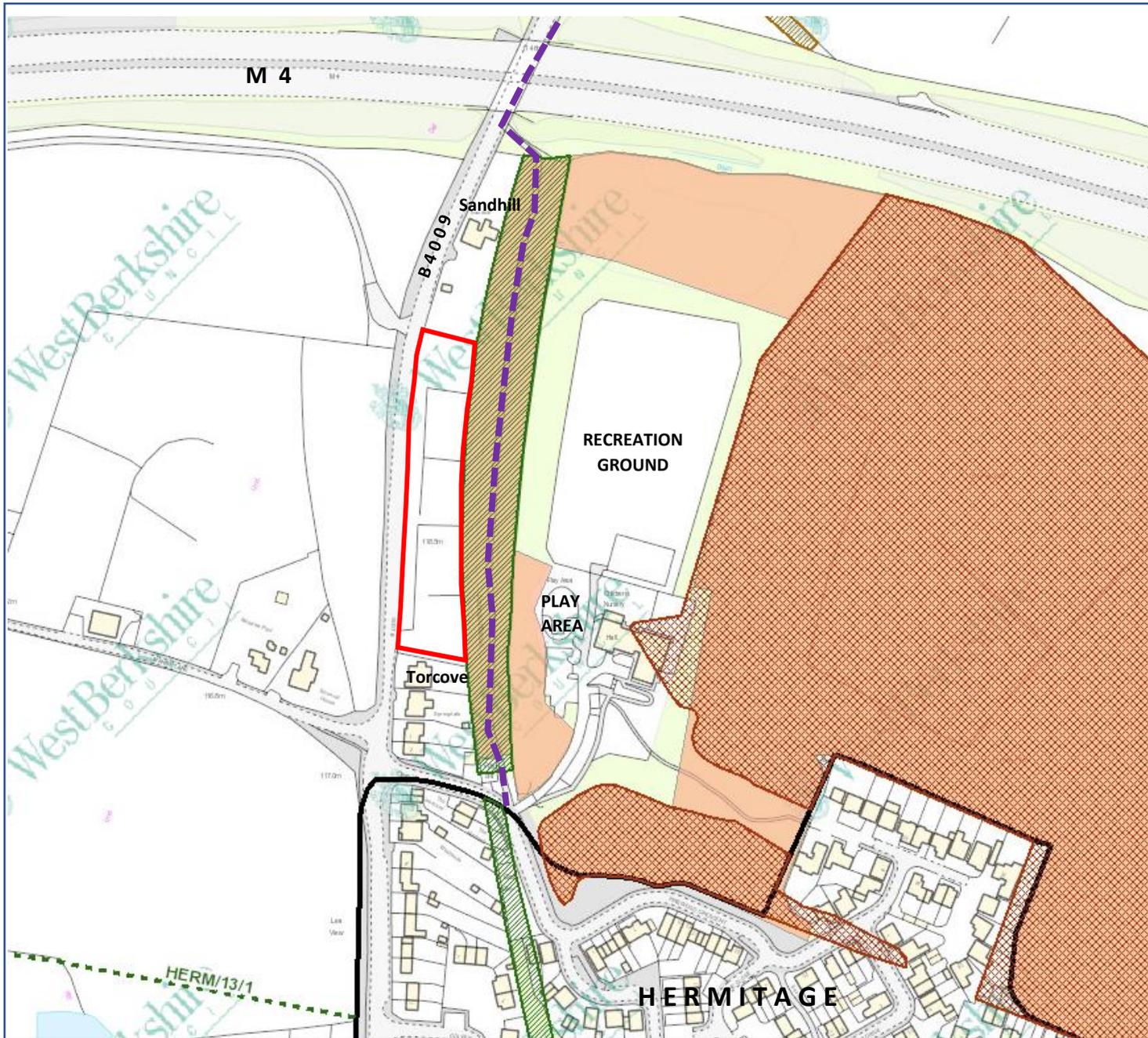
- 9.2 In conclusion, the Inspector and Secretary of State are respectfully requested to dismiss the appeal on unacceptable landscape and visual grounds.

WB APPENDIX LAA: FIGURES AND PHOTOGRAPHS

- **Figure LA1:** WBC Core Strategy and the Eling Way
- **Figure LA2:** Aerial photograph of appeal site and wider context
- **Figure LA3:** Zone of Theoretical Visibility (ZTV) and photo viewpoints
- **Figure LA4:** Original site baseline condition

Photo viewpoints: Locations as set out on Figure LA3 – **Print out at A3**

FIGURE LA1



Appeal site

West Berkshire Core Strategy 2006 - 2026



Hermitage settlement boundary



Local Wildlife Site: Pinewood Pits Furze Hill



Tree Preservation Orders – Woodland



Tree Preservation Orders – Area



Eling Way – footway and cycleway

Project: Land south of Sandhill

Drawing Title: WBC Core Strategy Policy and the Eling Way

Drawing No: 01/2025/LA1

Drawn By: TA **Checked by:** LA

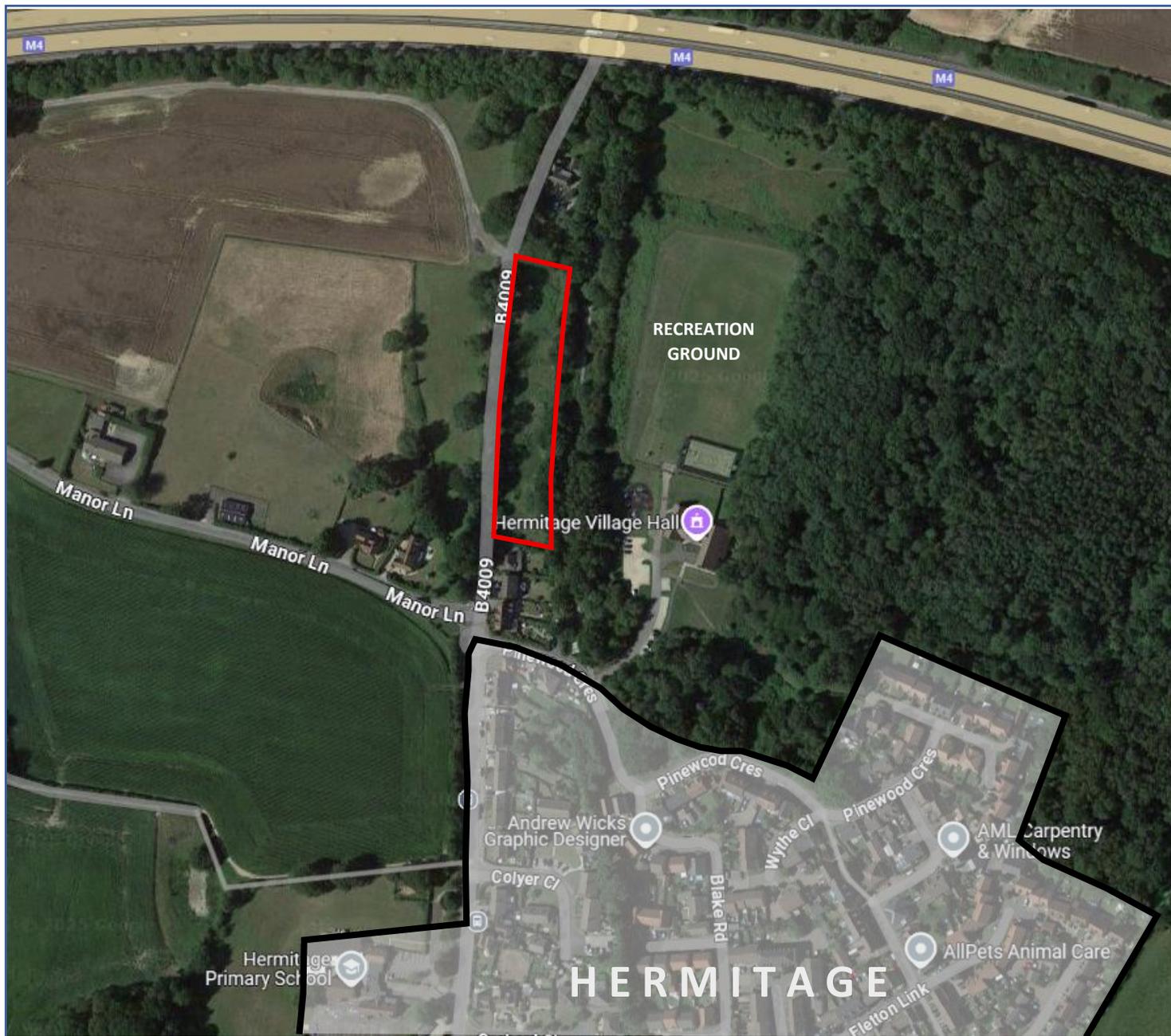
Date: March 2025

Scale: NTS – see scale bar



NORTH

FIGURE LA2



Appeal site boundary



Hermitage settlement boundary



NORTH

0 50m 100m 200m



Project: Land south of Sandhill

Drawing Title: Aerial photo of appeal site and local context

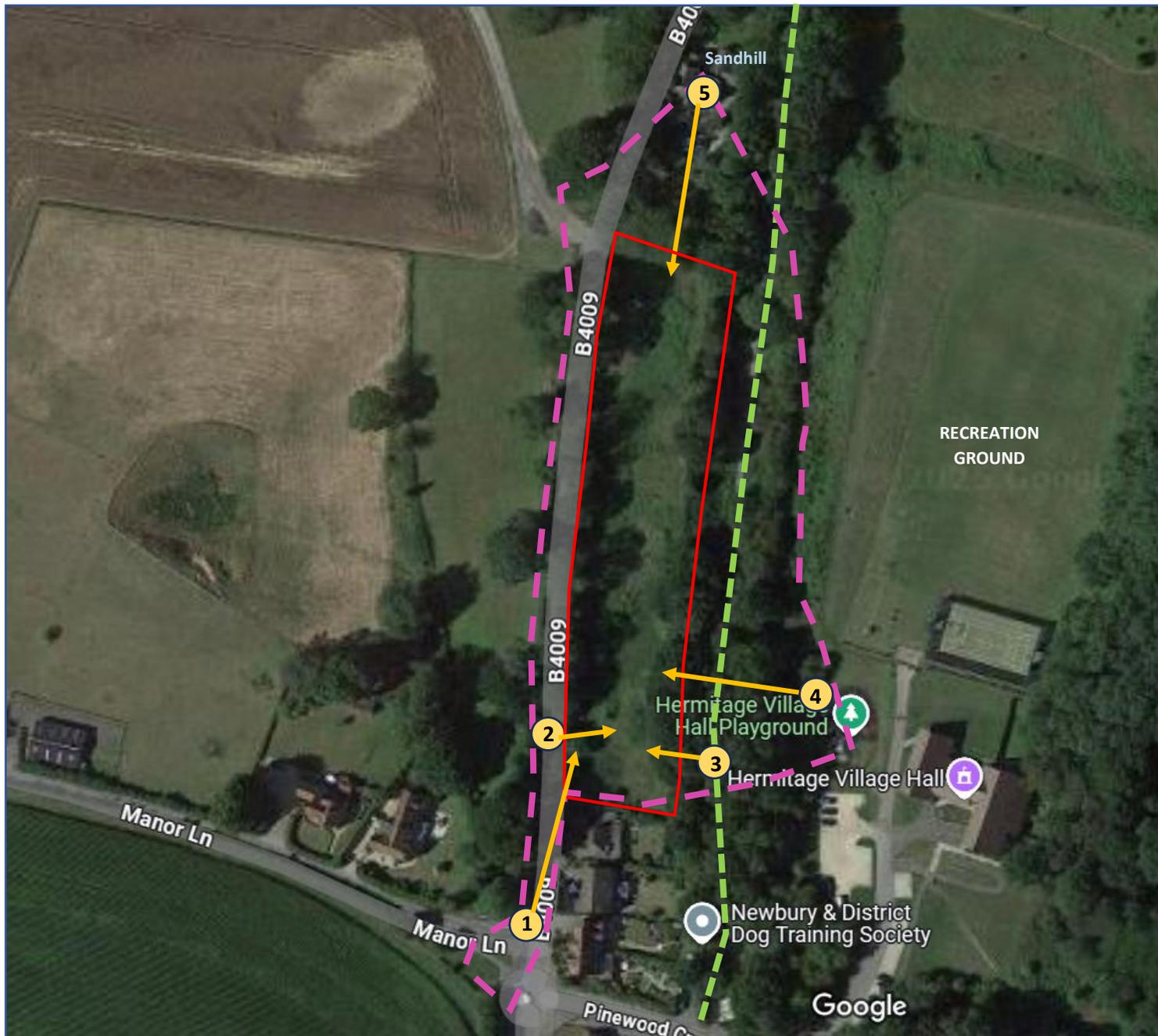
Drawing No: 02/2025/LA2

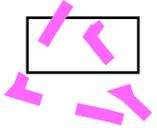
Drawn By: TA **Checked by:** LA

Date: March 2025

Scale: NTS – see scale bar

FIGURE LA3



-  Appeal site boundary
-  Eling Way footway and cycleway
-  Zone of Theoretical Visibility - the boundary of the area where the appeal site and proposed development is and will be theoretically visible from
-  Photo Viewpoints – see WB Appendix LAA: Figures and Photographs and WB Appendix LAB – Visual and Landscape Impact Tables

Project: Land south of Sandhill

Drawing Title: **Zone of Theoretical Visibility and photo viewpoints**

Drawing No: 03/2025/LA3

Drawn By: TA Checked by: LA

Date: March 2025

Scale: NTS – see scale bar

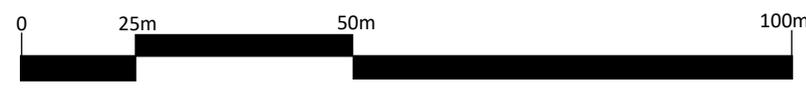
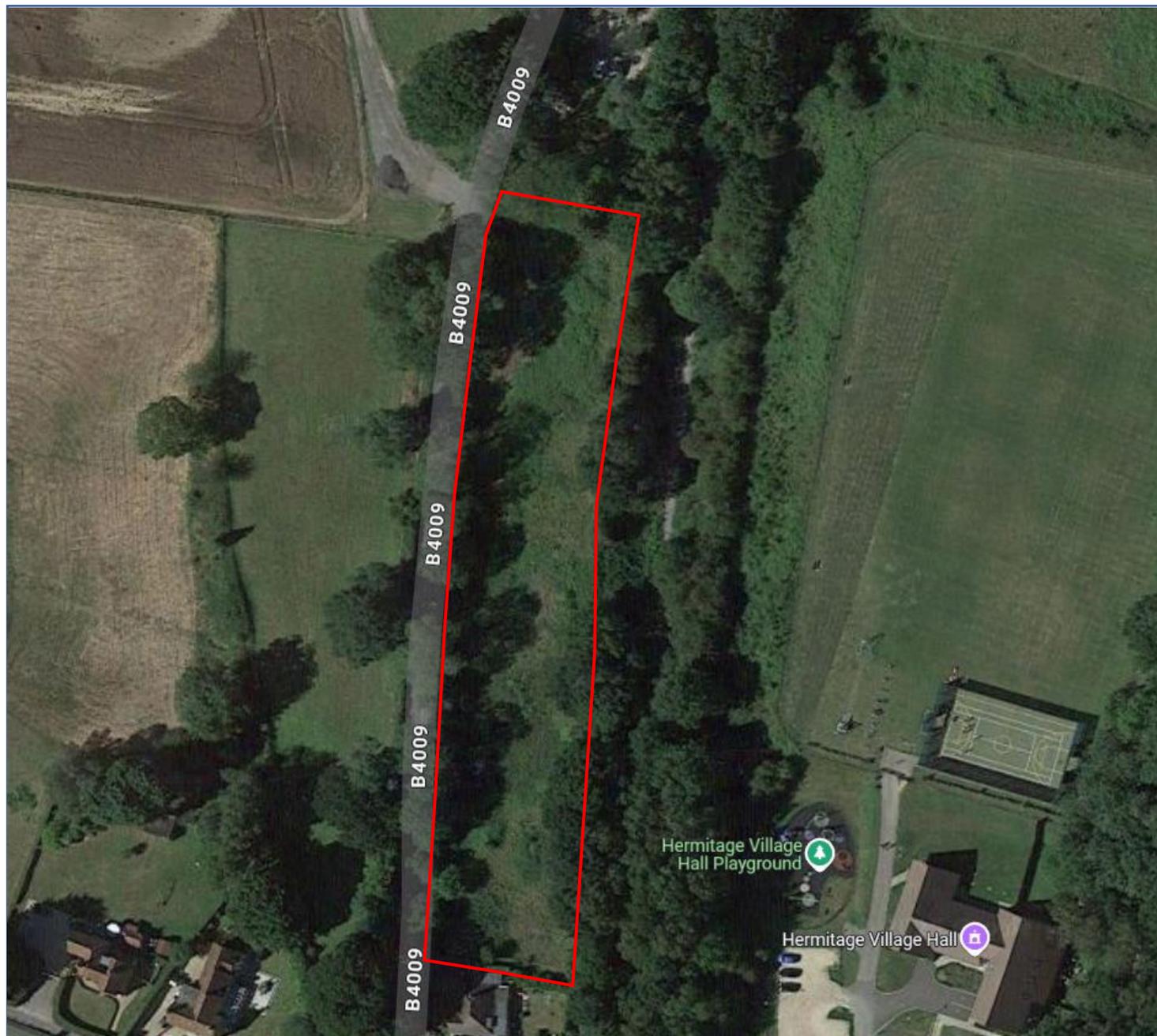


FIGURE LA4



Appeal site boundary



NORTH



Project:	Land south of Sandhill
Drawing Title:	Appeal site baseline condition
Drawing No:	09/2025/LA4
Drawn By:	TA
Checked by:	LA
Date:	March 2025
Scale:	NTS – see scale bar

Photo viewpoints: Locations as set out on WB Appendix LAA Figure LA3 – Print out at A3

Camera: Sony A7 Full Frame: lens FE 1.8/50 **Height of camera:** 1.5m:

Visualisation Type: Type 1, **Projection:** Planar, Horizontal Field of View (HFOV) 39.6 degrees **Image Enlargement/Sheet size:** 100% @ A3 – to be viewed at a comfortable arm's length: **Page size/ Image size** 420 x 297 / 390 x260

Location/Direction of view/Date/Time:

Photo viewpoint LA1: B4009 Looking north east: SU 51033 73076: 5th March 2025/ 1.30pm

Photo viewpoint LA2: B4009 looking east), Looking north west: SU 51036 74028: 5th March 2025 / 1.33pm

Photo viewpoint LA3: Eling Way, Looking west: SU 51089 74042: 5th March 2025/ 10:30am

Photo viewpoint LA4: Hermitage recreational ground, adjacent play area Looking west: SU 51113 74022: 5th March 2025 / 10:40am

No photo for viewpoint 5, from Sandhill

Date/Weather conditions

5th March 2025: Bright and clear

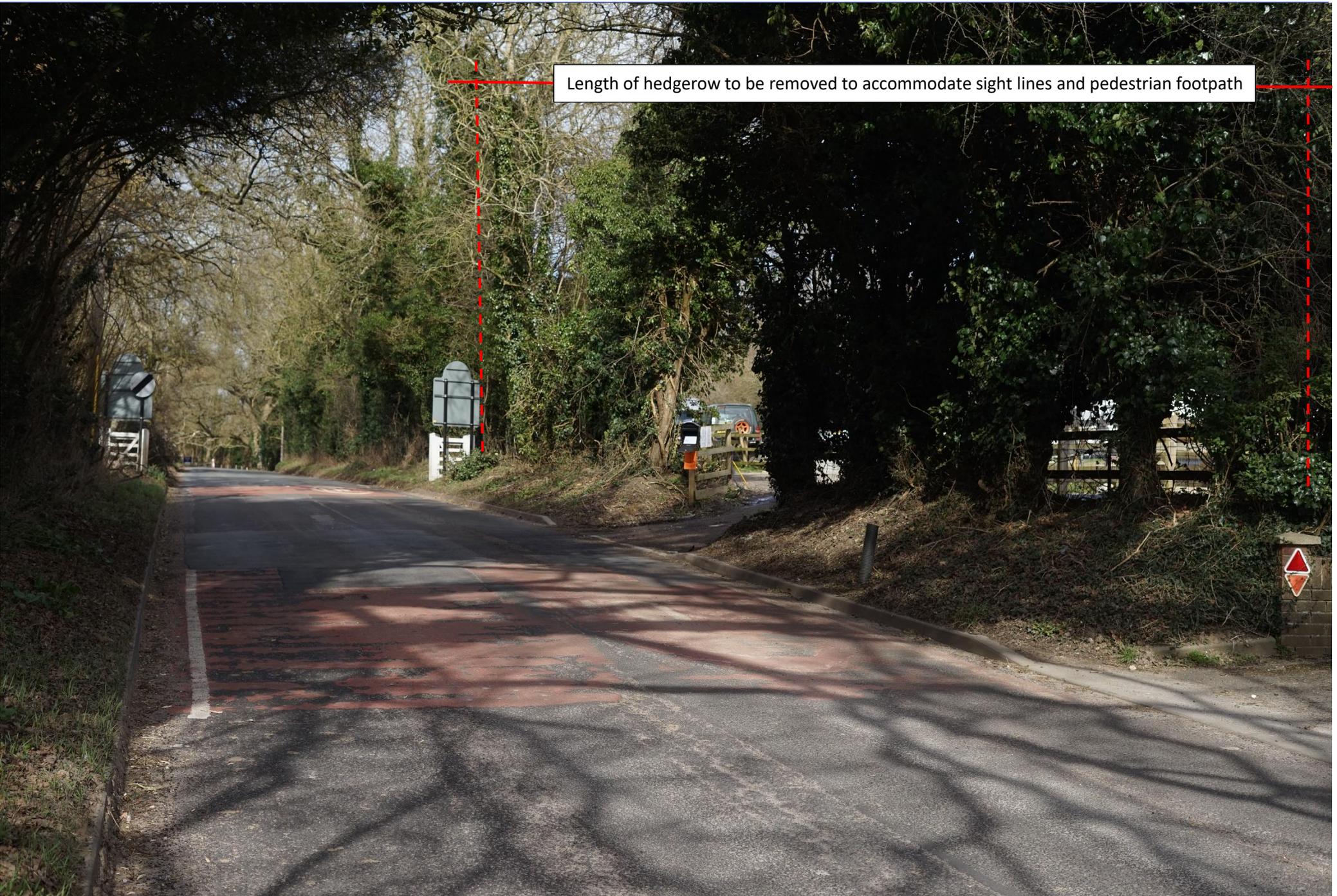


Photo Viewpoint LA1: View from the B4009 towards the appeal site. As shown the existing site boundary hedgerow screens and filters views into the appeal site. To comply with Highway standards, a visibility splay will be required and a pedestrian footpath which will remove a length of hedgerow which will open up views directly into the whole appeal site



Photo Viewpoint LA2: View from the B4009 towards the appeal site. As shown at this location there are direct views into the appeal site of the unauthorised development
WB Landscape Appendix LAA: Photo viewpoints



Photo Viewpoint LA3: Looking west towards the appeal site from the multi recreational path: Eling Way. Activities within the eastern area of the appeal site will be visible as shown by the unauthorised development. March 2025



Photo Viewpoint LA4: Looking west over the Eling Way to the appeal site. The unauthorised development replaces a view of a grass field as shown

WB LANDSCAPE APPENDICES LAB: VISUAL IMPACT AND LANDSCAPE IMPACT TABLES

- **Table 1:** Susceptibility to change of the landscape receptors for this appeal site.
- **Table 2:** Value of the landscape receptors for this appeal site.
- **Table 3:** Landscape Impact Table
- **Table 4:** Visual Impact Table
- **Table 5:** WBLCA 2019, Appendix 5: Assessing the suitability of the development proposals on the appeal site

TABLE 1: SUSCEPTIBILITY TO CHANGE OF THE LANDSCAPE RECEPTORS FOR THIS APPEAL SITE.

Susceptibility to change: GLVIA3 para. 5.40 provides guidance on assessing the susceptibility to change of landscape receptors. In the light of that guidance, Table 1 below sets out the susceptibility to change of the landscape receptors for the appeal site and the type of development proposed, in this instance, 5 pitches each including the following: 1 No mobile home, 1 No touring caravan, 1 No day room, area of hardstanding and access from Hampton Norreys Road (B4009). The baseline for this assessment is based on the original condition of the appeal site, before any unauthorised development took place, although it is still referenced

Landscape receptor	Landscape susceptibility to change	Rational for classification
Land use: Grassland	<i>High</i>	Grassland, contained in a field. Strong landscape structure, good sense of place
Trees	<i>Medium/high</i>	Tree survey undertaken; Trees are part of a continuous hedgerow along the B4009, forming a linear feature and part of the hedgerow structure of this area. Adjacent the eastern appeal site boundary there is a woodland with a blanket TPO. Appeal site provides open setting for trees
Hedgerow – roadside (western appeal site boundary)	<i>High</i>	Mature hedgerow, contributes to network of hedgerows. A highway compliant access will require sight lines, which will require the removal of up to 20m of hedgerow to the north and removal of the hedgerow to the south for construction of the 1.5m pedestrian pavement
Appeal site landscape character	<i>High</i>	The appeal site would have been a small grass field, An open setting for adjacent mature trees. This area will be particularly susceptible to development. Generally strong landscape structure and characteristic patterns
Surrounding landscape character	<i>High</i>	Well defined edge of settlement character, with long views across landscape to the west to wooded hills (listed as important view within Hermitage Design guide.) This is an established landscape with a well-defined character where only well-considered changes could be accommodated without loss of key characteristics. Good sense of place
Hermitage settlement edge	<i>High</i>	The appeal site forms part of and contributes to the rural settlement edge character of Hermitage. Its intact form of a small grassed field, hedgerow with mature trees. There would have also have been views into the appeal site from the B4009, visible as a small field. Overall, a good sense of place with a strong landscape structure, characteristic patterns and balanced combination of landform and landcover
North Wessex Downs National Landscape Landscape Type 8: Lowland Mosaic Character Area 8A: Hermitage Wooded Commons	<i>High</i>	National Landscape. Appeal site forms a key characteristic and part of the special qualities which contribute to the landscape character of the National Landscape, Special qualities which are potentially incompatible with the development
WBLCA 2019 LCT WH Woodland and Heathland Mosaic LCA WH4: Cold Ash Woodland and Heathland Mosaic	<i>High</i>	Recognisable landscape structure, characteristics patterns and combinations of landform and landcover are evident. Distinct features worthy of conservation and are potentially incompatible with the development

TABLE 2: VALUE OF THE LANDSCAPE RECEPTORS FOR THIS APPEAL SITE.

The landscape receptors are set out below with a summary of: (1) their condition: whether they were intact and well maintained and in good health; (2) representativeness: importance to local character; (3) perceptual aspect: whether of cultural or historic significance and considered contributing to the attractive appearance, tranquillity or wildness of an area; and (4) any designations. The baseline for this assessment is based on the original condition of the site, before any unauthorised development took place

Landscape receptor	Condition	Representativeness Importance to local character	Perceptual	Designation	Landscape value
Land use: Grassland	As shown on the most recent aerial photo, the grass could be fallow, but any revised management would improve its condition Overall intact	A characteristic small field often found on the edge of settlements which enhance their rural character and transition to a wider more open agricultural landscape. Part of the key characteristics and valued features and qualities of WBLCA 2019 - LCA WH4	Visible as a small field which forms the rural setting for the settlement edge of Hermitage and the rural character of the B4009 a key approach road into Hermitage	WBLCA listed as valued feature National Landscape	<i>High</i>
Trees	Adjacent trees to appeal site are in a good condition (mainly B category). The trees adjacent the eastern appeal site boundary have TPOs. Appeal site as a grass field provides open setting Overall intact	A key feature within this landscape providing the National Landscape with its woody intimate character	Trees contribute to the woody character for this part of the National Landscape.	TPO National Landscape	<i>High</i>
Hedgerow	Important mature roadside hedgerow. Was in good condition before the unauthorised development. Part of the rural character of B4009 and the edge of settlement character of Hermitage Overall intact, although presently damaged by the unauthorised development	Enhances and maintains established rural character of settlement edge	Part of the rural character of the B4009 and the woody character of the settlement edge. Intact	WBLCA listed as valued feature National Landscape	<i>High</i>
Appeal site character	Would have been in good condition (pre-unauthorised development) as an area of grassland, with intact field hedgerow and open setting for adjacent trees.	Small field on edge of settlement enhances the rural character of Hermitage	A visual and physical link with the wider rural area	National Landscape	<i>High</i>
Surrounding landscape character (Local)	The surrounding landscape character of the appeal site is in a good condition as open countryside within the NL, although traffic noise is apparent from M4; The area west of the B4009 provides long views over open countryside. The area to the east is a woodland with a blanket TPO. To the south, four properties extend residential development beyond the settlement edge boundary. Adjacent property is a low-lying bungalow	Part of the mixed mosaic and variable land cover of woodlands, pasture and heathland with a strong hedgerow pattern. Part of the key characteristics and valued features and qualities of LCA WH4 - WBLCA 2019	Contributes to the rural open character of this area	National Landscape	<i>High</i>

Settlement edge character of Hermitage	The appeal site as a small grass field provides a transition to the adjacent open landscape. Enhances Hermitage's rural settlement edge character	Contributes to Hermitage's rural character	Provides a rural setting. Connection to a rural landscape	National landscape	<i>High</i>
North Wessex Downs National Landscape Landscape Type 8: Lowland Mosaic Character Area 8A: Hermitage Wooded Commons	Good, although traffic noise from M4 is distracting, however due to the wooded character of area, there are only limited views which reduces its overall presence	Good	Mature wooded landscape, with some long views across farmland to wooded horizons	National Landscape	<i>High</i>
WBLCA 2019 LCT WH Woodland and Heathland Mosaic LCA WH4: Cold Ash Woodland and Heathland Mosaic	Physical condition is good, with recognisable landscape structure, characteristics patterns and combinations of landform and landcover are still evident	Contains key characteristic and valued features and qualities of LCA WH5 - WBLCA 2019	Area retains a rural identity on the edge of a settlement. The fields, hedgerows, mature hedgerow trees and woodland areas are retained.	National Landscape	<i>High</i>

TABLE 3 LANDSCAPE IMPACT TABLE

1. My landscape impact assessment methodology is set out in **WB Landscape Appendices Appendix LAC**
2. Development for five pitches each with a mobile home, touring caravan and day room with a remodeled access off the B4009
3. Comments on the suitability and practicality of the proposed mitigation planting see **section 5** of WB Landscape PoE
4. Dark orange represents an effect which is significant and pale pink although not significant on its own, cumulative these effects on a wide range of receptors should be considered important in decision making

Landscape receptor	Susceptibility to change see Table 1	Value see Table 2	Overall sensitivity	Scale of effect	Extent of effect	Duration of effect	Overall magnitude of impact	Significance of effects in Year 1	Significance of effects in Year 15	Landscape mitigation taken into account – see comments within LA PoE on suitability
Land use: grass for grazing	High	High	<i>High</i>	Replaced by compacted surfaces, for mobile homes, touring caravans, utility buildings and access road. Very little identified remaining grass	Loss of circa 90% of the grass in a small field	Permanent	<i>High</i>	Substantial adverse effect	Substantial adverse effect	5m strips around perimeter of pitches proposed as meadow grassland and managed for conservation, which realistically will be used as garden/amenity space. Therefore, not achievable
Trees	Medium/High	High	<i>Medium/High</i>	Loss of tree within sight lines with remaining trees context and character urbanised/compromised	Small scale	Permanent.	<i>Medium</i>	Moderate adverse effect	Minor adverse effect	The 2.3m high acoustic fence will limit the locations for successful tree planting and tree growth
Hedgerow-Western appeal site boundary	High	High	<i>High</i>	Loss of 25m of hedgerow to accommodate sight lines and 1.5m wide pedestrian path	Prominent location on settlement edge	Permanent	<i>Medium/high</i>	Major adverse effect	Major adverse effect	Infill of gaps within hedgerow and limited new hedgerows across appeal site will not reduce the loss of the hedgerows for sight lines

Landscape receptor	Susceptibility to change see Table 1	Value see Table 2	Overall sensitivity	Scale of effect	Extent of effect	Duration of effect	Overall magnitude of impact	Significance of effects in Year 1	Significance of effects in Year 15	Landscape mitigation taken into account – see comments within LA PoE on suitability
Appeal site character	High	High	<i>High</i>	Across complete site, will change from a grass field to an area dominated by 2.3m high acoustic fences, caravans, mobile homes, utility buildings, parked vehicles and garden paraphernalia	Complete change of character to domestic residential site. The extent will be visible to a large number of people travelling on the adjacent B4009 approaching and leaving Hermitage	Permanent	<i>High</i>	Substantial adverse effect	Substantial adverse effect	The appeal site will be urbanised and will not relate to the surrounding countryside.
Surrounding landscape character (Local)	High	High	<i>High</i>	Visible from adjacent local landscape	Dilution of an intact rural character by the introduction of suburban features	Permanent	<i>Medium/high</i>	Major adverse effect	Major adverse effect	The landscape mitigation measures will not compensate for the loss of the field
Settlement edge character of Hermitage	High	High	<i>High</i>	Loss of rural character on settlement edge	On main access route into Hermitage	Permanent	<i>Medium/high</i>	Major adverse effect	Major adverse effect	The landscape mitigation measures will not compensate for the loss of the field
North Wessex Downs National Landscape Landscape Type 8: Lowland Mosaic Character Area 8A: Hermitage Wooded Commons	High	High	<i>High</i>	Localised	Visible location	Permanent	<i>Medium/high</i>	Major adverse effect	Major adverse effect	The landscape mitigation measures will not compensate for the loss of the field and the development proposals will not conserve and enhance the National Landscape

Landscape receptor	Susceptibility to change see Table 1	Value see Table 2	Overall sensitivity	Scale of effect	Extent of effect	Duration of effect	Overall magnitude of impact	Significance of effects in Year 1	Significance of effects in Year 15	Landscape mitigation taken into account – see comments within LA PoE on suitability
WBLCA 2019 LCT WH Woodland and Heathland Mosaic LCA WH4: Cold Ash Woodland and Heathland Mosaic	High	High	<i>High</i>	A small semi contained site, however is a valued landscape feature	The location adjacent a main route into Hermitage is sensitive, visible from a number of locations within immediate landscape.	Permanent	<i>Medium/high</i>	Major adverse effect	Major adverse effect	No mitigation measures or conservation or enhancements in line with landscape strategy for this area

TABLE 4: VISUAL IMPACT TABLE

- References are to photo viewpoints in WB Landscape Appendix LAA. The location of viewpoints are shown on WB Landscape Appendix LAA Figure LA3
- My visual impact assessment methodology is set out in WB Landscape Appendices Appendix LAC
- Dark orange represents an effect which is significant and pale pink although not significant on its own, cumulative these effects on a wide range of receptors should be considered important in decision making

	Visual Receptor Name/Type/Location	Distance from appeal Site (M)	Sensitivity	Views prior to the development	Comments on impact of development	Proposed mitigation	Magnitude of Change	Impacts Year 1 winter	Impacts Year 15 summer
PV LA1	B4009	40m	Medium Sus = L Value = H	Country road with well treed hedgerows and glimpsed view of grass field beyond (Appeal site)	<u>Year 1: Winter views:</u> Due to the required visibility splays and construction of the 1.5m wide pedestrian pavement there will be open views into the appeal site of the acoustic fence, mobile homes, caravans, utility buildings, parked vehicles, post and rail fencing and garden paraphernalia <u>Year 15: Summer views:</u>	New hedgerows/ trees within appeal site and on boundaries	High	Major/ Moderate adverse effect	Major/ Moderate adverse effect
PV LA2	B4009	Adjacent	Medium Sus = L Value = H	Country road with well treed hedgerows and view of grass field beyond (Appeal site), enclosed by woodland	<u>Year 1: Winter views:</u> Framed views into whole of appeal site, with views of acoustic fencing, mobile homes, caravans, utility buildings, garden paraphernalia and parked vehicles. These elements are totally uncharacteristic when set within the attributes of the view <u>Year 15: Summer views:</u> The limited internal hedgerows and trees maturing will not adequately mitigate the proposed development	New hedgerows/ trees within appeal site and on boundaries	High	Major/ Moderate adverse effect	Major/ Moderate adverse effect
PV LA3	Eling Way	8m	High Sus = H Value = H	Winter view up embankment through trees (TPO) to fence line (eastern appeal site boundary) terminating in open sky. This once would have been a simple rural view with no buildings or structures, which would add to the rural character of the Eling Way.	<u>Year 1: Winter views:</u> View up to the appeal site through woodland to eastern area of appeal site, with the proposals visible on the skyline <u>Year 15: Summer views:</u> Intervening woodland will semi screen views within the summer months. It will be difficult to establish a hedgerow under the tree canopy along the appeal site boundary	New hedgerow/ trees on appeal site boundary	Medium/ high	Major/ Moderate adverse effect	Minor adverse effect, due to off-site intervening woodland and not proposed mitigation measures

PV LA4	Adjacent the Play Area	30m	High Sus = H Value = H	Originally before any unauthorised development, the appeal site would have been visible as a small grass field, with open farmland beyond	<u>Year 1: Winter views:</u> numerous framed views through intervening woodland of proposed development including the acoustic fence, caravans, mobile homes, utility buildings, parked cars and garden paraphernalia. <u>Year 15: Summer views:</u> The intervening woodland will screen the views. It will be difficult to establish a hedgerow under the tree canopy along the appeal site boundary	New hedgerow on appeal site boundary	Medium	Moderate adverse effect	Minor adverse effect due to off-site intervening woodland and not proposed mitigation measures
PV LA5	Sandhill - no photo	Garden adjacent House 43m	Medium/ High Sus = M Value = H	Originally before any unauthorised development, the appeal site would have been visible as a small grass field,	<u>Year 1: Winter views:</u> Views from first floor windows across the whole of the appeal site which would include the acoustic fence, caravans, mobile homes, utility buildings, parked cars and garden paraphernalia. <u>Year 15: Summer views:</u> There is proposed tree and hedgerow planting along the northern appeal site boundary. This would need to work with the alignment of the 2.3m high acoustic fence for any plants to grow successfully	New hedgerow and tree planting on appeal site boundary	High	Major/ Moderate adverse effect	Major/ Moderate adverse effect

TABLE 5: AS PER APPENDIX 5 OF THE WBLCA 2019 ASSESSING THE SUITABILITY OF THE DEVELOPMENT PROPOSALS ON THE APPEAL SITE

Landscape Character Area	LCA WH4 Cold Ash Woodland and Heathland Mosaic
How will the proposals contribute to the <u>Landscape Strategy</u> ?	Liz Allen (West Berkshire Council's landscape consultant) Response
<p>1) Conserve and enhance the special qualities of the nationally designated landscape of the North Wessex Downs AONB <i>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.</i></p>	<p>The overall management objective for this Landscape Type is to conserve and enhance the distinctive small scale and enclosed landscape including field patterns and hedgerows. The proposed development will result in the loss of a small grass hedged field which contributes to this mosaic.</p> <p>Non-compliant</p>
<p>4) Conserve and strengthen existing boundary elements <i>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.</i></p>	<p>The appeal scheme will have an adverse landscape effect on the boundary roadside hedgerow due to the requirement for visibility splays and a pedestrian pavement. Proposed mitigation measures include hedgerow planting around the appeal site boundary, which will not compensate for the length of hedgerow permanently lost</p> <p>Non-compliant</p>
<p>5) Retain the distinction between and individual identity of settlements <i>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... 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.</i></p>	<p>Presently the appeal site as a small field contributes to Hermitage's rural character and rural setting within the National Landscape</p> <p>Due to the linear shape of the appeal site, the proposed development will form ribbon development beyond the settlement boundary of Hermitage, extending development out into the open countryside</p> <p>The appeal site is located on a main approach road into Hermitage which due to the required sight lines and requirements for the appeal site, cannot be adequately contained by the proposed landscape mitigation measures</p> <p>Non-compliant</p>
<p>6) Conserve elements that mark a transition between settlement and countryside <i>Where possible retain small, enclosed fields around villages, and farm buildings which contribute positively to rural character.</i></p>	<p>The appeal site as a small grassed field contributes positively to the settlement edge character of Hermitage. The proposed development will result in a change of character of the appeal site from a grass field to a suburban site dominated by acoustic fencing, mobile homes, buildings, caravans, parked cars and garden paraphernalia. The development proposals will not retain the small enclosed field character, which would have contributed positively to Hermitage's rural character</p> <p>Non-compliant</p>

Will any <u>Key Characteristics</u> be affected by the proposal?	Liz Allen (West Berkshire Council's landscape consultant) Response
<p>3) Complex pattern of land cover, dominated by woodland and with remnant heaths <i>The area is distinctive for its varied geological pattern of clays, silts, sands and gravels, which result in nutrient-poor soils. The mixed sand, clay and gravel substrate creates a mosaic of land cover including damp pasture, paddocks and heathland, the latter concentrated in Bucklebury, but woodland is a prominent landscape element. Most former heathland is now tree-covered, with coniferous plantation and regenerated woodland, and interlinked linear woodland extends down the slopes from the ridge across the clay towards the valley landscape, including thin wooded valleys centred on minor tributary streams such as The Bourne.</i></p>	<p>YES: The appeal scheme will result in the direct loss of a grass field and change the landscape character of the field to an area of suburban development.</p>
<p>4) Varied field pattern with strong hedgerows <i>There is a varied field pattern with irregular fields, interspersed with parcels of woodland and commons indicative of medieval and post-medieval assarts. Fields with parallel and sinuous boundaries predominate, and represent 'ladder' fields probably resulting from the 17th and 18th century informal enclosure. Field boundaries include dense and intact hedgerows with trees, with larger amalgamated fields present in some areas.</i></p>	<p>YES: The appeal scheme will also require a modified point of access with visibility splays which will require the removal of 25m of existing hedgerow. This will degrade the existing intact hedgerow field boundary.</p>
<p>6) Relatively densely settled, particularly along the ridge, but with woodland containment <i>A fairly well-populated area with numerous, mostly linear, villages along the ridge (including Bradfield Southend, Beenham, Cold Ash and Hermitage), with further settlement spread out along the roads during the 20th century. Smaller hamlets and farmsteads are often located on the mid slopes, whilst larger private residences and large institutional buildings, such as Douai Abbey and several private schools, are scattered throughout the woodlands. The main building material is brick and tile, although timber framing and thatch also occur. Tree cover means that settlements typically feel rural and isolated, with many houses set back from the road and fronted by trees (this is particularly the case at Upper Bucklebury), although modern development is more evident towards the western end of the character area at Cold Ash, Ashmore Green, Hermitage and along the B4009.</i></p>	<p>YES: The appeal site contributes to the wooded setting and containment of Hermitage. The development proposals will result in the weakening of this intact rural setting</p>
<p>7) A minor road network contained by the wooded landscape <i>Busier roads, notably the M4, are limited to the fringes of the character area, and within the area the undulating and wooded landscape contains and limits the influence of roads. On the ridge slopes, winding rural lanes pass through open and wooded landscapes, and are frequently overhung by deep grassy or woodland banks.</i></p>	<p>The M4 is located circa 115m to the north of the appeal site. However, due to the well wooded character of this area, its influence is lessened and only limited to traffic noise</p> <p>However, due to the noise from the M4 this will require mitigation measures and acoustic noise fences within the appeal site, adding additional suburban features to the appeal site</p>
<p>8) An accessible landscape <i>An extensive network of footpaths, bridleways and byways pass through this landscape, connecting the small settlements, and many of the woodlands and commons have open access.</i></p>	<p>YES: The development proposals will have an adverse visual effect on users of the Eling Way which runs adjacent to the appeal site</p>

Will the proposal adversely affect any of the <u>Valued Features and Qualities</u> or exacerbate any of the <u>Detractors</u> ?	Liz Allen (West Berkshire Council's landscape consultant) Response
<p>VALUED FEATURES AND QUALITIES:</p> <p>1) Nationally valued landscape which forms part of the North Wessex Downs AONB The eastern half of the character area, and land to the north of the southern edge of the ridge between Cold Ash and Woolhampton forms part of the nationally designated landscape of the North Wessex Downs AONB. The mosaic of ancient semi-natural woodlands, plantations, remnant heathland and open farmland, deriving from the area's varied geology, and the sense of seclusion often engendered from this mix, are noted as special qualities relating to this character area. Historic parklands are also noted as being a particular feature of the lowlands above the Kennet Valley.</p>	<p>YES: The appeal site is located within the National Landscape. The appeal scheme will extend development and suburban features into the open landscape of the National Landscape.</p>
<p>3) The varied land cover mosaic and important habitats The variety of woodland forms, including valley woodlands and wooded ridgelines, the presence of heathland, rivers and the varied field pattern, make this an interesting and intimate landscape. The ecological importance of heathland, ancient woodland and grassland habitats adds to landscape interest.</p>	<p>YES: The appeal site as a small grass field adds to landscape interest and an intimate landscape on the settlement edge of Hermitage</p>
<p>4) A very rural character away from major roads and urban edges Landform and tree cover mean that away from the urban edges of Thatcham and Newbury and from the M4 there is a rapid transition upslope to a more intimate rural landscape, with small traditional villages and farmsteads and dark skies. The transition in character along Stoney Lane between Shaw and Ashmore Green is an example of this. The wooded context of settlements and roads helps integrate their built form into the landscape.</p>	<p>YES: The appeal site as a grass field contributes to the rural location of the recreation ground and rural character of the Eling Way. The visibility of the proposed development will have an adverse effect on the amenity value of these areas</p>
<p>DETRACTORS:</p> <p>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. However, farm buildings, even when development has left them adjacent to settlement edges, contribute to rural character when they retain a relationship with farmland; and small enclosures, even when used as paddocks, form a transition between settlement and countryside that can contribute positively to landscape character, particularly when they retain a relationship with a historic settlement core.</p>	<p>YES: The loss of this small field of grassland to development will exacerbate an identified detractor</p>
<p>8) Increased traffic on the rural lane network There is pressure on the network of rural lanes, many of which are single track with few passing places. Heavy traffic on narrow lanes has a significant impact on countryside character, but standard highway improvements such as widening, kerbing, signage and broad visibility splays can create a more urban character which is out of context as well as encourage greater usage.</p>	<p>YES: Extensive visibility splays and a pedestrian footpath requiring the removal of 25m of hedgerow will create a more suburban character</p>

* Special qualities derived from The North Wessex Downs Area of Outstanding Natural Beauty Management Plan. These are supplemented by the information contained in the North Wessex Downs AONB Landscape Character Assessment (2002)

LANDSCAPE AND VISUAL IMPACT ASSESSMENT METHODOLOGY

I. INTRODUCTION

- I.1 The landscape and visual impact assessment methodology follows the ‘*Guidelines for Landscape and Visual Impact Assessment: Third Edition*’ The Landscape Institute and Institute of Environmental Management and Assessment 2013 (GLVIA3). The GLVIA3 (paragraphs 2.19 to 2.22) sets out how landscape and visual matters are to be considered.

Effects on landscape as a resource:

‘Landscape results from the interplay of the physical, natural and cultural components of our surroundings. Different combinations of these elements and their spatial distribution create the distinctive character of landscapes in different places.’ Character is not just about the physical elements and features that make up a landscape, but also embraces the aesthetic, perceptual and experiential aspects of the landscape that make different places distinctive’.

Views and visual amenity:

The assessment of visual effects is ‘*assessing the effects on specific views and on the general visual amenity experienced by people.*’

- I.2 **Assessment of effects:** The likely landscape and visual effects are described and for each effect the significance of the landscape effect can be assessed by combining the level of sensitivity of the landscape or visual receptor with the magnitude of the landscape effect. The results of the assessments are set out in summary within Landscape and Visual Impact Tables. A step-by-step approach to identifying the sensitivity, magnitude of change and effect of the development using levels set out in the following tables and a matrix to identify the significance of the effects has been employed.

2. AREA OF STUDY

- 2.1 The landscape and visual impact assessment considers the area from which the ZTV or site surveys show that the site or the development may be visible, unscreened by local topography and by large areas of vegetation or built form. This will be identified as the visual envelope. The landscape study area may extend beyond a small visual envelope where there is evidence that the site is part of a wider landscape character area. Detailed studies will be carried for an area appropriate to the development where tall structures such as wind turbines may have an impact at some distance.

3. METHODOLOGY FOR ASSESSMENT OF LANDSCAPE EFFECTS

3.1 **Landscape baseline:** This will involve identifying the **landscape receptors** by:

- Mapping, describing and illustrating the character of the landscape by appropriate means including reference to the relevant landscape character assessments;
- Identifying landscape-based designations and others (heritage, nature conservation, recreational etc) of relevance to the landscape character that may be impacted by the development;
- Identifying and describing individual elements and aesthetic and perceptual aspects of the landscape that contribute to character;
- Indicating the general condition of the landscape;
- Establishing the relative value of the receiving landscape.

3.2 Where appropriate, the LVIA will identify local landscape character areas for assessment. These character areas are as determined by field work and by reference to published Landscape Character Assessments. Criteria for the selection of local landscape character areas within the likely envelope of influence will be by reference to:

- Proximity and influence on the site;
- Physical connections with the site (for example public rights of ways, rivers and canals, roads, vegetation and vegetation belts);
- Views of the site (particularly where the view is a key characteristic of the local landscape character area).

3.3 **Landscape sensitivity:** This is determined by combining the susceptibility of the landscape receptor to change and the value of the landscape receptor.

3.4 **Susceptibility to change:** This refers to the inherent sensitivity of the landscape receptor and ability of the landscape receptor to accommodate a particular change. Landscape receptors include specific site features, the landscape character of the appeal site, the landscape character of the receiving landscape character area (the immediate area and the relevant Landscape Character Area (LCA)), and other LCAs which may be affected indirectly by the proposals as a result of offsite works, transport needs or visual impacts.

Table 1: Landscape susceptibility to change

Category	Criteria
High - exceptional	<ul style="list-style-type: none"> • Special qualities which are wholly incompatible with the development • Strong landscape structure, characteristics, patterns, balanced combination of landform and landcover • Appropriate management is being carried for land use and landcover • Many distinct features worthy of conservation; • Strong sense of place and • No detracting features
High	<ul style="list-style-type: none"> • Special qualities which are potentially incompatible with the development • Generally strong landscape structure, characteristic patterns and balanced combination of landform and landcover • Appropriate management for land use and landcover but potentially scope to improve • Distinct features worthy of conservation • Good sense of place and • Occasional detracting features
Medium-high	<ul style="list-style-type: none"> • Special qualities may be vulnerable to the development • Recognisable landscape structure, characteristics patterns and combinations of landform and landcover are still evident • Scope to improve management for land use and land cover • Some features worthy of conservation • Some sense of place and • Some detracting features
Medium	<ul style="list-style-type: none"> • Special qualities may be able to accommodate the development • Distinguishable landscape structure, characteristic patterns of landform and landcover often masked by land use • Scope to improve management of vegetation • Some features worthy of conservation • Some detracting features
Medium-low	<ul style="list-style-type: none"> • Developments may be appropriate • Weak landscape structure, characteristic patterns of landform and landcover masked by land use • Mixed land use evident • Lack of management and intervention has resulted in degradation and • Frequent detracting features
Low	<ul style="list-style-type: none"> • Developments may be appropriate and unlikely to be harmful • Degraded landscape structure, characteristic patterns and combinations of landform and landcover are masked by land use • Mixed land use dominates • Lack of management/intervention has resulted in degradation; and • Extensive detracting elements

3.5 Landscape value: The value of the landscape is based on the value or importance given to the area by society, statutory bodies, local and national government and the local community. National designations include National Parks and Areas of Outstanding Natural Beauty. Some local authorities will have local landscape designations. GLVIA3 however also concludes that the fact that an area is not in a designated landscape does not mean that it is not valued (para 5.26) and in this case reference should be made to landscape character assessments, local policies and guidance. The GLVIA3 recommends that there should not be over reliance on

designations (para. 5.45). Weight will be given to landscape receptors reported in published documents such as Village Design Statements.

Table 2: Landscape value

Value	Typical criteria	Typical scale	Typical examples
Exceptional	Greatest importance (or quality) and rarity. No or limited potential for substitution	International National	World Heritage site National Park National Landscape
High	High importance (or quality) and rarity. Limited potential for substitution	National Regional Local	National and local landscape designations, listed as valued features and qualities within local landscape character assessments
Medium	Medium importance (or quality) and rarity. Limited potential for substitution	Regional Local	Landscape or a landscape element which contains some qualities or features which are valued
Low	Low importance (or quality) and rarity	Local	Areas identified as having some redeeming features and possibly identified for improvement
Very low	Low importance (or quality) and rarity	Local	Area identified for recovery

3.6 Overall sensitivity of the landscape to proposed development: Sensitivity is a factor of both the value attached to a landscape and its key characteristics and their susceptibility to change. These are combined as follows:

Table 3: Overall landscape sensitivity

	Exceptional value	High value	Medium value	Low value	Very low value
High-exceptional susceptibility to change	VH	H	MH	X	X
High susceptibility to change	H	H	MH	X	X
Medium-high susceptibility to change	H	MH	M	ML	X
Medium susceptibility to change	MH	MH	M	ML	L
Medium-low susceptibility to change	X	MH	M	ML	L
Low susceptibility to change	X	X	ML	L	L

Overall sensitivity: VH – Very high; H – High; MH – Medium-High; M – Medium; ML – Medium-Low; L – Low; X – Excluded

3.7 Magnitude of change to landscape receptors: The following definitions are used to assess the magnitude of change to landscape receptors. In order to determine the impact of the development the magnitude of change arising from the development has been classified as described in Table 4.

3.8 There is no standard methodology for assessing magnitude of change but key to the assessment will be:

- **The size or scale of the development:** this should take into consideration the size and scale of the proposed development and the extent of the loss to existing landscape receptors, the proportion of the

total extent on site that this represents and the contribution of the element to the character of the landscape;

- **The extent of the development:** this considers the geographical area over which the landscape effects may be felt. This is at site level; level of the immediate setting; at the scale of the local landscape character area; and may be on a larger scale affected a number of local landscape areas or a regional landscape area;
- **The permanency of the development:** This may be long term or short term; will depend on whether the development is reversible or changes the status of the site e.g. to previously developed land; and whether for example restoration to baseline conditions is envisaged;
- **The change to the key characteristics of the receiving landscape:** This will take account of changes to the appearance of the site; on landscape features; on key or special qualities characteristic of the landscape; and on the landscape setting of historic and nature conservation assets;
- **The proposed mitigation:** this considers the extent to which the landscape proposals will be able to mitigate the effects of the development by replacing or enhancing landscape features or limiting the effects on the wider landscape.

Table 4: Landscape magnitude of change

Magnitude of change	Typical criteria
High	Total loss of or major alteration to key elements/features/characteristics of the landscape baseline (i.e. pre-development landscape) and/or introduction of elements considered to be totally uncharacteristic when set within the attributes of the receiving landscape
Medium-high	Major loss of or alteration to key elements/features/characteristics of the landscape baseline (i.e. pre-development view) and/or introduction of elements considered to be largely uncharacteristic when set within the attributes of the receiving landscape
Medium	Partial loss of or alteration to one or more key elements/features/characteristics of the landscape baseline (i.e. pre-development landscape) and/or introduction of elements that may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape
Low	Minor loss of or alteration to one or more key elements/features/characteristics of the landscape baseline (i.e. pre-development landscape) and/or introduction of elements that may not be characteristic when set within the attributes of the receiving landscape
Beneficial	Enhancement over and above proposals to mitigate the impact of development. Improvement to the status quo for example through positive changes to existing poor landscape and built features or areas.

- 3.9 **Significance of landscape effect:** The significance of landscape effect has been determined by cross-referencing the sensitivity of the receptor with the magnitude of change expected as a result of the development.

Table 5: Landscape significance of effect

	High Magnitude of Change	Medium-high Magnitude of Change	Medium Magnitude of Change	Low Magnitude of Change
Very high overall sensitivity	Substantial adverse	Substantial adverse	Major adverse	Major/Moderate adverse
High overall sensitivity	Substantial adverse	Major adverse	Major/Moderate adverse	Moderate adverse
Medium-high overall sensitivity	Major adverse	Major/Moderate adverse	Moderate adverse	Minor adverse
Medium overall sensitivity	Major/Moderate adverse	Moderate adverse	Minor adverse	None
Medium-Low overall sensitivity	Moderate adverse	Minor adverse	None	None
Low overall sensitivity	Minor adverse	None	None	

3.10 **Significant effects:** For the purposes of the impact assessment, adverse effects between substantial and major/moderate effect (in darker pink) are considered to be significant and to be of key importance in decision making. Moderate adverse effects (in pale pink) should also be taken into account when considering the overall effects of the development in decision making.

3.11 The lower levels of effect: moderate and minor may not be significant in themselves but cumulatively these effects on a wide range of receptors may either together be considered important in decision making; or alternatively considered important in conjunction with significant effects on other receptors.

3.12 **Definition of significance categories:**

Substantial adverse: The proposed development would be at complete variance with the character of the site and its landscape setting and its landform, scale and pattern; it would permanently damage the integrity of valued characteristics; and would permanently devalue a valued landscape. A 'substantial' adverse landscape impact would only occur where landscapes of a very high sensitivity are affected.

Major adverse: The proposed development would be at complete variance with the character of the site and its landscape setting and its landform, scale and pattern; it would permanently damage the integrity of valued characteristics; and would permanently devalue a landscape.

Major/moderate adverse: The proposed development would result in material changes to the landscape of the site and its landscape setting, to its landform, scale and pattern which cannot be effectively mitigated. The integrity of the site is compromised and the value substantially undermined.

Moderate adverse: The proposed development would be out of scale with the landscape and result in the loss of characteristics of the site and its landscape setting

but this can be mitigated to some degree and aspects of the quality and value of the site retained and enhanced.

Minor adverse: The proposed development would have some effect on some characteristics of the site and its landscape setting but the overall character is sustained and the value of the landscape is not materially harmed or has been mitigated.

Neutral: The proposed development would not materially alter the character of the site and its setting nor detract from the value of that landscape.

4. METHODOLOGY FOR ASSESSMENT OF VISUAL EFFECTS

4.1 On the basis of baseline data and site visits, visual receptors are identified and classified as to their sensitivity to changes in view.

4.2 **Visual baseline:** This will involve identifying the visual receptors by:

- Identifying the area in which the development may be visible;
- Identifying the different groups of people who may experience views of the development;
- Identifying representative viewpoints where views will be affected and the nature of those views, including where these are within the site area;
- Identifying any recognized viewpoints (known viewpoints in the landscape);
- Identifying any views characteristic of the landscape character area;
- Identifying any illustrative viewpoints (that might identify a particular effect or issue).

Table 6: Visual susceptibility to change

Category	Criteria
High	Residents within main rooms of house and people who are engaged in outdoor recreation including PRoW and prominent trails
Medium	Residents within non main rooms of house. Quite rural roads and rail users
Low	Other motorists and those engaged within sports or work

Table 7: Visual value

Category	Criteria
Very High	Viewers in locations where the view is of principal significance such as from viewpoints within World Heritage Site, National Park and National Landscape
High	Views in areas within national and local landscape designations and valued landscapes
Medium	Views in areas which contains some qualities or features which are valued
Low	Views in areas identified as having some redeeming features and possibly identified for improvement

4.3 Sensitivity of visual receptors: The sensitivity of the visual receptor needs to be established. This is dependent on the value attached to the view and the susceptibility of the visual receptors to change.

Table 8: overall visual sensitivity

	Very high value	High value	Medium value	Low Value
High susceptibility	VH	H	M/H	M
Medium susceptibility	H	M/H	M	M/L
Low susceptibility	M/H	M	ML	L

4.4 Magnitude of change to visual receptors: The following definitions are used to assess the magnitude of change to visual receptors. In order to determine the impact of the development the magnitude of change arising from the development has been classified as described in Table 7.

4.5 There is no standard methodology for assessing magnitude of change but key to the assessment will be:

- **The size or scale of the development:** this should take into consideration the mass and scale of the development visible and the change in the view with respect to loss or addition of features in the view and changes to its composition (including the proportion of the view occupied by the proposed development and the degree of contrast or integration of the proposed development with the existing landscape elements and characteristics) and the nature of the view in terms of duration and degree of visibility;
- **The extent of the development:** this will vary with different viewpoints and is likely to reflect the extent of the development visible in the view and the distance of the viewpoint from the proposed development;
- **The permanency of the development:** This may be long term or short term; will depend on whether the development is reversible or changes the status of the site e.g. to previously developed land; and whether for example restoration to baseline conditions is envisaged;
- **The proposed mitigation:** this considers the extent to which the landscape proposals will be able to mitigate the visual effects of the development by screening or design of the development (for example siting, colour use, location of open space).

Table 9: Visual magnitude of change

Magnitude of change	Typical criteria
High	Total loss of or major alteration to key elements/features/characteristics of the visual baseline (i.e. pre-development landscape) and/or introduction of elements considered to be totally uncharacteristic when set within the attributes of the view
Medium-high	Major loss of or alteration to key elements/features/characteristics of the visual baseline (i.e. pre-development view) and/or introduction of elements considered to be largely uncharacteristic when set within the attributes of the view
Medium	Partial loss of or alteration to one or more key elements/features/characteristics of the visual baseline (i.e. pre-development landscape) and/or introduction of elements that may be prominent but may not necessarily be considered to be substantially uncharacteristic when set within the attributes of the view
Low	Minor loss of or alteration to one or more key elements/features/characteristics of the visual baseline (i.e. pre-development landscape) and/or introduction of elements that may not characteristic when set within the attributes of the view
Negligible	Imperceptible loss of or alteration to one or more key elements/features/characteristics of the visual baseline (i.e. pre-development landscape) and/or introduction of elements that are not characteristic with the view – approximating to the no-change situation

4.6 **Significance of visual effect:** The significance of visual effect has been determined by cross-referencing the sensitivity of the receptor with the magnitude of change expected as a result of the development.

Table 10: Visual significance of effect

	High Magnitude of Change	Medium-high Magnitude of Change	Medium Magnitude of Change	Low Magnitude of Change	Negligible Magnitude of Change
Very high Sensitivity	Substantial adverse	Major adverse	Major/Moderate adverse	Moderate adverse	Minor adverse
High Sensitivity	Major adverse	Major/Moderate adverse	Moderate adverse	Minor adverse	Neutral
Medium Sensitivity	Major/Moderate adverse	Moderate adverse	Minor adverse	Neutral	Neutral
Low Sensitivity	Moderate adverse	Minor adverse	Neutral	Neutral	Neutral

4.7 **Significant effects:** For the purposes of the impact assessment adverse effects between substantial and major/moderate effect (in darker pink) are considered to be significant and to be of key importance in decision making. Moderate adverse effects (in pale pink) should also be taken into account when considering the overall effects of the development in decision making.

4.8 The lower levels of effect: moderate and minor may not be significant in themselves but cumulatively these effects on a wide range of receptors may either together be considered important in decision making; or alternatively considered important in conjunction with significant effects on other receptors.

4.9 **Definition of significance categories:**

Substantial adverse: The proposed development would result in overwhelming adverse changes to the view from sensitive viewpoints and the enjoyment of that view by high sensitivity visual receptors. It would introduce wholly intrusive or incongruous elements that would harm the appearance and scenic quality of the view. A 'substantial' adverse effect would only affect views from very highly sensitive viewpoints.

Major adverse: The proposed development would result in overwhelming adverse changes to the view from high sensitivity viewpoints and the enjoyment of that view by high sensitivity visual receptors. It would introduce wholly intrusive or incongruous elements that would harm the appearance and scenic quality of the view.

Major/moderate adverse: The proposed development would result in changes to the view and the enjoyment of that view by visual receptors so that the proposed development dominates the view. It would introduce many intrusive or incongruous elements that would harm the appearance and scenic quality of the view.

Moderate adverse: The proposed development would result in changes to the view from sensitive viewpoints and the enjoyment of that view by visual receptors so that the proposed development is prominent in the view. It would introduce some intrusive or incongruous elements that would harm the appearance and scenic quality of the view.

Minor adverse: The proposed development would have some effect on visual receptors but the overall character of the view is sustained and the appearance of the landscape is not materially harmed or has been mitigated.

Neutral: The proposed development would not materially alter the appearance of the area as experienced by visual receptors.