

Appeal Statement of Case

Local Planning Authority

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

Appeal: APP/W0340/W/25/3360702

Site: Land Bounded by Hoad Way and M4 and High Street,
Theale

Proposal: Full planning application for the construction of 2 employment units for flexible uses within Class E (light industrial), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Hoad Way, parking and landscaping.

Date: April 2025

Council Reference: 24/00145/FULMAJ

Appeal Statement of Case

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Appendices

- 1 Landscape Sensitivity and Capacity Assessment for THEA(8): Land off Hoad Way, Theale (September 2021).
- 2 Landscape Consultant's comments from 20 May 2024 and 16 July 2024

1. Introduction

- 1.1 This Statement of Case has been prepared in respect of an appeal lodged against the refusal of planning permission (Council reference 24/00145/FULMAJ) for 2 employment units for flexible uses within Class E (light industrial), B2 and/or B8 of the Use Classes Order (including ancillary office provision) with associated enabling works, access from Hoad Way, parking and landscaping.

Reasons for Refusal

- 1.2 The application was refused for the following reasons:

- The application site comprises some 5.4 hectares of greenfield land outside of, but adjacent in part, to the settlement of Theale, a Rural Service Centre. Policy ADPP1 of the West Berkshire Core Strategy 2006-2026, states that within the countryside only appropriate limited development will be allowed focusing on addressing identified needs and maintaining a strong rural economy. The proposed development does not specifically support the rural economy nor is it limited in scale. The supply of employment sites across the district for the next 10 years will be successfully managed through the Local Plan Review with a commitment from the Council to revisit this to ensure adequate longer term delivery up to 2041. As such the short term needs for commercial space are adequately met and there is no immediate need for sites.*

The significant scale of the use and built form is far from limited and is not considered to be compatible with the nearby residential uses. Policy CS9 of the West Berkshire Core Strategy seeks to ensure that uses are compatible. The proposal introduces a large scale commercial use immediately adjacent to an otherwise predominantly residential area with associated amenities. The existing pattern of uses in the surrounding area maintains a greater separation and distinction between the residential settlement of Theale and the commercial area to the south, which would be eroded by the proposed development.

Accordingly the proposal fails to comply with Policy ADPP1 and CS9 of the West Berkshire Core Strategy 2006-2026 and the economic objective of the National Planning Policy Framework which seeks to ensure that new development is in the right place.

2. *The application site is located within Flood Zone 2. Policy CS16 of the West Berkshire Core Strategy 2006-2026 states that the sequential approach will be strictly applied across the district with the aim of locating new development within those areas at the lowest flood risk. The policy clearly states that development will only be accepted if it is demonstrated that it is appropriate at that location and that there are no suitable and available alternatives at a lower flood risk. Due to concerns for the methodology which underpins the sequential test; the suitability and accuracy of the evidence base which unpins the search and the approach taken to exclude sites based on their size, the application fails to demonstrate that there are currently no alternative sites available at a lower risk of flooding. As such the proposals fail to comply with the requirements of Policy CS16 of the West Berkshire Core Strategy 2006-2026 and the guidance within the National Planning Policy Framework and Planning Practice Guidance.*

3. *The site comprises of some 5.4 hectares of relatively flat grassland with some areas of trees/shrubs. The site is semi-open along its southern, western and northern edge to the surrounding area and wider landscape. Towards the eastern end overhead electricity cables cross the site with one large pylon. The site is located on the eastern edge of the historic village settlement of Theale and is partly within the Theale High Street and Blossom Lane Conservation Area. The application site is important to the semi-rural setting of this part of the village.*

The loss of this greenfield site and the proposed buildings by virtue of their scale and design will have a significant adverse effect on the landscape quality of this area and the setting of the National Landscape and views across to it. The impacts will also harm the setting of the High Street and Blossom Lane Conservation Area, and adversely effect the separate identity of Theale from Calcot and degrade the approach and gateway into Theale, an historic settlement. The scale of the proposed buildings is vastly disproportionate to the scale of the existing dwellings and commercial businesses which boarder the site as these are predominately 2 storey and the jarring impact of this can be seen from a range of vantage points along the High Street. Furthermore, the proposals will have an adverse effect on identified valued landscape features and qualities. For these reasons the proposals fail to comply with Policies ADPP5, CS14 and CS19 of the West Berkshire Core Strategy 2006-2026 and the guidance within the National Planning Policy Framework and the AONB Management Plan.

4. *The site is set on the edge of the historic village of Theale partly adjacent and within the Theale High Street and Blossom Lane Conservation Area. The site is visible from the eastern most edge of the conservation area with the entrance into*

Theale from Hoad Way being among the most prominent. Here the undeveloped character of the site contributes to the original village setting of Theale. Policy CS19 of the Core Strategy seeks to conserve and where appropriate enhance heritage assets and their settings in line with paragraph 8 of the National Planning Policy Framework.

The proposed development will have a negative impact on the setting of the conservation area and result in a loss of legibility to the eastern part of the conservation area. The proposed built form is also distinctly out of keeping with the appearance and scale of the existing buildings on the edge of the settlement. This harm is further accentuated by the use of grey gradient panels which are strikingly graphic. The proposed development will result in a Moderate/High level of less than substantial harm to the setting of the conservation area. Despite being less than substantial, this harm is real and serious and outweighs the public benefits. As such the proposals fail to comply with Policy CS19 and CS14 of the West Berkshire Core Strategy 2006-2026 and the guidance within the National Planning Policy Framework with regards to conserving and enhancing the historic environment.

Scope of Statement of Case

- 1.3 This Statement of Case has been prepared in accordance with the Planning Inspectorate's *Procedural Guide (Planning Appeals – England)*. It supports the Council's reasons for opposing the development.

Procedural Matters

- 1.4 Following the receipt of the amended Flood Risk Sequential Assessment, dated February 2025 the Council withdraw refusal reason 2. As such no evidence will be presented in relation to refusal reason 2. The Council emailed the Planning Inspectorate and the appellant on 11th March 2025 to confirm this.

2. Appeal Site and Proposal

Appeal Site

- 2.1 The Site Location Plan (18-095-SGP-ZZ-ZZ-DR-A-131000 P3) submitted with the appeal and accompanying the planning application identifies the red line appeal site. The site comprises of 5.4 hectares of relatively flat grassland with access onto Hoad Way.
- 2.2 The appeal site is bounded by the M4 to east, Bath Road to the south. The Bath Road and junction 12 of the M4 are elevated. To the north of the site is the High Street with residential dwellings opposite facing towards the appeal site. Access and egress are proposed onto Hoad Way to the west of the site. In the north-west corner is a small cluster of buildings both commercial and residential.
- 2.3 The site is semi-open along its southern, western and northern edge with boundaries defined by trees, hedges and fences. Towards the eastern end of the site overhead electricity cables cross the site with one large pylon.
- 2.4 The site is located on the eastern edge of the historic village settlement of Theale, outside of the defined settlement boundary of the rural service centre. The appeal site is partly within the Theale High Street and Blossom Lane Conservation Area in the west at the proposed access. However, the proposed developed part of the site would lie adjacent to the conservation area.
- 2.5 The statement of common ground and the proofs of evidence will describe the site and surroundings in more detail as appropriate and necessary.

Planning History

- 2.6 The relevant planning history of the appeal site is set out in Table 2.1.

Table 2.1: Planning History

Application	Proposal	Decision
21/02029/COMIND	Full planning application for the construction of 3 employment units for flexible uses within Class E (light industrial), B2 and B8 of the Use Class Order (including ancillary office	Withdrawn

	provision) with associated enabling works, access, parking and landscaping.	
20/00476/OUTMAJ	Outline application for up to 20,000 sqm of commercial floorspace comprising B1(c), B2 and B8 floorspace along with associated access. Matters to be considered: Access.	Withdrawn

Appeal Proposal

- 2.7 The application seeks the construction of 2 employment units for flexible uses within Class E (light industrial), B2 and/or B8 of the Use Class Order (including ancillary office provision) with associated access and landscaping works. A new access is proposed from Hoad Way to serve the development. A new pedestrian access is proposed in the north onto the High Street.
- 2.8 The proposed development seeks to provide one unit of 4,556.45 m² of Gross Internal Area and a second unit of 5,088.29m². The units would form a single block with a combined width of 162 metres and 55 metres in depth. The building is designed with a flat roof and the top of the parapet would be 13 metres that sits on a slab base that is 0.9 metres high.
- 2.9 The rear elevation would run parallel to the High Street beyond the appeal site boundaries. To the front of the units is an area of hard standing forming service yards and car parking spaces. Landscaping is proposed to the west, north and the two corners within the east of the site. An attenuation pond will be positioned to the north of the units.
- 2.10 The pylon and electricity line to the east confines the built development to the western part of the site. The area beyond the pylons will remain undeveloped.

3. Planning Policy

Statutory Development Plan

- 3.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise¹. The development plan is therefore the starting point for decision making. Where a planning application/appeal conflicts with an up-to-date development plan, permission should not usually be granted. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.
- 3.2 The statutory development plan for West Berkshire is currently made up of a number of different documents². Table 3.1 sets out those development plan documents that are relevant to the appeal proposal, together with a list of the relevant policies.

Table 3.1: Statutory Development Plan

Development Plan Document	Relevant Policies
West Berkshire Core Strategy 2006-2026 (WBCS) http://info.westberks.gov.uk/corestrategy	ADPP1, ADPP4, ADPP5, ADPP6, CS5, CS8, CS9, CS10, CS11, CS13, CS14, CS15, CS16, CS17, CS18, CS19
West Berkshire District Local Plan 1991-2006 Saved Policies 2007 (WBDLP) http://info.westberks.gov.uk/article/28783	OVS5, OVS6, TRANS1
Minerals and Waste Local Plan 2022-2037 (MWLP) https://www.westberks.gov.uk/mwlp	Policy 9

- 3.3 The Council considers that the appeal proposal is in conflict with the following policies: ADPP1, ADPP5, CS9, CS14 and CS19.

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

² Full development plan: West Berkshire Core Strategy 2006-2026 (adopted July 2012); Housing Site Allocations DPD 2006-2026 (adopted May 2017); West Berkshire District Local Plan 1991-2006 Saved Policies 2007 (as amended in July 2012 and May 2017); Stratfield Mortimer Neighbourhood Development Plan (adopted June 2017); Cold Ash Neighbourhood Development Plan (adopted May 2024), Compton Neighbourhood Development Plan (adopted February 2022), Hermitage Neighbourhood Development Plan (adopted May 2024) South East Plan Natural Resource Management Policy 6 (relating to the Thames Basin Heaths Special Protection Area); Minerals and Waste Local Plan 2022-2037 (adopted December 2022).

Material Considerations

- 3.4 A number of documents are material considerations relevant to this appeal.
- 3.5 The **National Planning Policy Framework (NPPF)** sets out the Government's planning policies for England and how these should be applied. The NPPF is a material consideration in planning decision, which should be read as a whole (including its footnotes and annexes).
- 3.6 The **Planning Practice Guidance (PPG)** is an online publication which supplements the NPPF and, as a statement of government policy, may also be material when deciding applications/appeals.
- 3.7 The **Quality Design SPD (2006)** aims to help developers create places of high quality design which are sustainable, secure and accessible to all. The SPD series is made up of 10 documents.
- 3.8 The **North Wessex Downs AONB Management Plan (2019-2024)** is the statutory management plan for the designated national landscape. The current management plan has been extended until November 2025. Theme 6 of the management plan relates to Development.
- 3.9 The **North Wessex Downs AONB: Integrated Landscape Character Assessment by LUC (2002)** provides a Landscape Character Assessment for the North Wessex Downs National Landscape. It is identified that the site is set back from the boundary of LCA 8A: Hermitage Wooded Commons by approximately 20 metres.
- 3.10 The **West Berkshire Landscape Character Assessment (2019)** provides a comprehensive and up to date landscape character assessment for the district. The appeal site is identified to fall within Landscape Character Area RO1: Kennet Lower River with Open Water.
- 3.11 Other documents comprising material considerations which may be referred to at this appeal include:
- Landscape Sensitivity and Capacity Assessment for THEA(8): Land off Hoad Way, Theale (September 2021). Included at Appendix 1.

Emerging Policies

3.12 The Local Plan Review 2022-2039 (LPR) was submitted to the Secretary of State for independent examination on 31st March 2023, and is now at examination. Following the conclusion of the hearing sessions, consultation on the Proposed Main Modifications took place between 6th December 2024 and 31st January 2025. The representations made on that consultation have been sent to the Inspector, and the Inspector's report is awaited. Subject to the outcome of the Inspector's report, it is anticipated that the Local Plan Review will be considered by Full Council for adoption in May 2025, prior to the opening of the inquiry. The Council will update the Inspectorate and all parties as appropriate.

4. Main Issues

4.1 Taking into account the Council's reasons for refusal and the Appellant's Statement of Case, the main issues of this appeal can be broadly summarised as follows:

- Principle of development
- Industrial and logistics supply
- Landscape and visual impacts
- Heritage impacts

5. Principle of development

- 5.1 The first refusal reason addresses the development's conflict with the development plan in terms of location and scale of the proposed development and compatibility with the surrounding uses. It was identified that the development would conflict with Policies ADPP1 and CS9 of the WBCS and the NPPF.
- 5.2 The Council will recognise that part of the appeal site is adjacent to the settlement boundary of Theale. However, the site is outside of a defined settlement boundary. Therefore, under Policy ADPP1 it is identified as 'open countryside'. Development in the 'open countryside' will only be allowed where it is appropriate and limited focused on addressing an identified need and maintaining a strong rural economy.
- 5.3 Whilst it is noted that the appellant's, through their statement of case, seek to challenge the wider District need for employment land and the Council's approach to meeting its need it is considered that the Council's refusal reason 1 predominately relates to the location, scale and compatibility of the proposed development.
- 5.4 Policy ADPP1 states that only appropriate limited development will be allowed in the countryside focused on addressing an identified need and maintaining a strong rural economy. The Council will argue that it has not been sufficiently demonstrated that the large-scale industrial development on a greenfield site would specifically support the rural economy. Furthermore, evidence will be provided to support that the scale of the development is not appropriate limited development outside of a defined settlement boundary. It is considered this is substantiated by the third and fourth refusal reasons discussed under the subsequent headings.
- 5.5 Policy CS9 seeks to facilitate and promote the growth of business development in the plan period. The policy achieves this through firstly seeking the appropriate location of business development. This is considered to reflect the spatial strategy in ADPP1. Commercial development in the first instance is directed to Protected Employment Areas and existing suitably located employment sites and premises which this site does not form part of. The policy continues to state that proposals for uses outside of these areas/locations will be assessed against the following:

- Compatibility with uses in the area surrounding the proposals and potential impacts on those uses; and
- Capacity and impact on the road network and access by sustainable modes of transport.

5.6 It is acknowledged that the impact on the road network would not conflict with the criteria. However, the Council will demonstrate that the large-scale commercial use will not be compatible with the immediate residential uses due to its characteristics.

5.7 The Council will identify that there is a conflict with the aims of the NPPF in supporting a prosperous rural economy where it seeks that business development (meeting a local business or community need) positioned adjacent to or beyond an existing settlement would need to be sensitive to its surroundings.

5.8 Accordingly, the Council will demonstrate that the appeal scheme is contrary to Policies ADPP1 and CS9 of the WBCS and the NPPF.

6. Industrial and logistics land supply

- 6.1 The first reason for refusal refers to the Council's supply of employment sites and how through a plan-led approach seeks to manage the supply of appropriate industrial and logistics land.
- 6.2 The Council will advise that Policy CS9 seeks to facilitate the growth of business development within the current plan period. This includes identifying appropriate locations of business development, protecting employment areas and making efficient use of existing sites.
- 6.3 The Council will recognise that there is a shortfall in the provision of industrial space over the proposed plan period to 2041. However, it will be demonstrated that the emerging Local Plan Review seeks to facilitate the growth and forecasted change of business development over the plan period. Emerging Policy SP20 sets out the strategic approach for business development to assist in meeting the identified needs.
- 6.4 The Council note appendix 1 attached to the appellant's Statement of Case provides an 'Industrial and Logistics Need Assessment'. This Assessment considers both the immediacy of the need and the quantity of need over the plan period. However, the Council will challenge this Assessment and present evidence setting out how no relevant planning authority recognises the geography used for the Assessment and that no Berkshire Plan, emerging or adopted, has taken this approach.
- 6.5 Evidence will be provided regarding the weighting of current and emerging policy and how these manage the Council's need for industrial and logistics land supply.
- 6.6 Regardless of the dispute regarding the quantity of the need and its immediacy the Council will seek to demonstrate that it is recognised that the proposed development would contribute to the shortfall of logistics and industrial land supply and that this is a material consideration.

7. Landscape and visual impacts

- 7.1 The third refusal reason addresses the harm identified to the landscape quality of the site including the setting of the North Wessex Downs National Landscape. It was identified that this harm would conflict with the Council's development plan policies ADPP5, CS14 and CS19 of the WBCS. It would also conflict with the guidance within the North Wessex Downs AONB Management Plan. The Council will provide in their evidence the specific paragraphs where the development is considered to conflict with the WBCS and North Wessex Downs AONB Management Plan.
- 7.2 It is considered that the harm would conflict with the aims of the NPPF seeking to conserve and enhance the landscape and scenic beauty of a National Landscape and ensuring appropriate design for the development.
- 7.3 The Council will seek to demonstrate that the existing appeal site has an important contribution to the landscape and visual character of the area and is sensitive to change. This was identified by comments submitted on 20 May 2024 and 16 July 2024 provided by Liz Allen Environmental Planning Landscape Architecture who assisted the Council during the consideration of the application (attached at appendix 2) and the Landscape Sensitivity and Capacity Assessment . This includes the following reasons:
- The appeal site is in the setting of the North Wessex Downs National Landscape. The north-east corner of the appeal site is set-back 20 metres from the boundary of the National Landscape.
 - The site forms part of the separation between Theale and Calcot identified in West Berkshire Landscape Character Assessment 2019 under the landscape character area RO1: Kennet Lower River with Open Water. The degree of separation between Theale and Calcot cannot be achieved by the M4 alone.
 - The appeal site is partially located within the Theale High Street and Blossom Lane Conservation Area at the access and within its setting. The site is highly visible from the Conservation Area.

- The greenfield open site contributes positively to the setting of Theale as a historic village and a valued feature and quality of the area (RO1: Kennet Lower River with Open Water).
- The open site and its contribution to the setting of Theale and the separation between Theale and Calcot is accentuated by the elevated position of the surrounding road network to the east and south-east and that the appeal site is located next to a key route into the village (Hoad Way).

7.4 The Council will demonstrate that there is significant adverse landscape, visual and historic impacts from the development. This is due to the disproportionate scale, materiality and detailing of the development in the context of the open site and surrounding development. This includes adverse impacts to the site's landscape character, to the setting of the North Wessex Downs National Landscape, the Conservation Area (discussed under section 8.0), the site's contribution to the separation between Calcot and Theale, the impact on the gateway into the historic village of Theale and views from surrounding visual receptors.

7.5 Whilst the Council recognise that the Arlington Business Park is located to the south, it will be demonstrated that this area is not adjacent to the site and is visually separated from the appeal site.

7.6 The Council will refer to the updated scheme with the detailed mitigation and tree planting proposed that was not considered to sufficiently mitigate the proposals.

7.7 Accordingly, the Council will demonstrate how the development conflicts with Policies ADPP1, CS14 and CS19 of the WBCS and the NPPF.

8. Heritage impacts

- 8.1 Refusal reason 4 relates to harm to the Theale High Street and Blossom Lane Conservation Area. It is identified that there is a conflict with Policies CS19 and CS14 of the WBCS and the NPPF.
- 8.2 The appeal site is on the edge of the historic village of Theale and part of the appeal site at the access onto Hoad Way is within the Theale High Street and Blossom Lane Conservation Area. Due to the majority of the development sitting outside of the conservation area the development is considered primarily through the setting of the Theale High Street and Blossom Lane Conservation Area.
- 8.3 The Council will provide evidence that the appeal site positively contributes to the setting of the Theale High Street and Blossom Lane Conservation Area. This is because the undeveloped, rural and open character of the site contributes to the provision of historic context, retaining the edge of settlement character to the east side of the conservation area and the provision of a green buffer between the conservation area and the surrounding later development, namely road infrastructure.
- 8.4 The appeal site and conservation area can be viewed in context from the elevated highways to the south (A4) and south-east corner (M4 Junction 12) of the appeal site. The site is also visible within the conservation area from Hoad Way forming one of the main entrances to Theale and Theale High Street.
- 8.5 The Council will present evidence that there are three key areas of harm arising from the development, these are: the loss of open space and the impact on the setting of the conservation area and the provision of historic context, the loss of legibility of the eastern part of the conservation area, and the out of keeping design of the built form (including massing, bulk materiality and detailing) which alters the character of the site. It is considered that the proposed landscaping would not mitigate the visual impact of the development.
- 8.6 The Council consider that the harm is at the medium to high end of 'less than substantial harm'. The harm is real and serious. It is therefore considered there is a conflict with Policies CS14 and CS19 of the WBCS and the NPPF.

- 8.7 Due to the 'less than substantial harm' paragraph 213 of the NPPF requires that there is a clear and convincing justification for the harm. And paragraph 215 requires that the less than substantial harm must be weighed against the public benefits of the proposal. The Council will acknowledge there would be both economic and social benefits from the development. However, the Council will demonstrate that the great weight given to the conservation of heritage assets would outweigh the economic benefits.

9. Planning Balance and Conclusion

Planning Balance

9.1 The Council will identify that the following considerations are benefits of the development:

- The proposed development will help to meet an identified shortfall in industrial and logistics land supply. The Council sought to give this moderate weight during the consideration of the application. However, with the Government's agenda for economic growth it is recognised that this material consideration has greater weighting in the planning balance. Therefore, this is given significant weight in the planning balance.
- The proposed development would generate economic benefits during the construction and operational phase of the development including the provision of 150 jobs, a £11.8 million productivity boost and the annual uplift of business rates. However, these are speculative as this is not being built for a specific employer. These benefits could be achieved equally at a different employment sites. It is recognised that there would still be a benefit to the local and sub-regional economy and these would weigh significantly in favour of the development.

9.2 However, the Council will identify the following considerations that weigh against the development:

- The location, scale and compatibility of the proposed development within the surrounding area conflicts with Policies ADPP1 and CS9 of the WBCS. This is given substantial adverse weight in the planning balance.
- The Council afford substantial adverse weight to the harm identified to the landscape and visual impacts from the development. This includes that great weight is given to the harm to the setting of the North Wessex Downs National Landscape in accordance with paragraph 189 of the NPPF.
- Substantial adverse weight is attributed to the harm to the setting of Theale High Street and Blossom Lane Conservation Area. The Council consider that the public benefits do not outweigh the harm to the heritage asset (section 8.0).

- The proposed development will not be fully compliant with Policy CS15 of the WBCS. This is given moderate adverse weight as this would not meet the aims of the policy and the Councils declared climate emergency.
- 9.3 The Council's delegated report gave substantial adverse weight to the conflict with the requirements of Policy CS16. However, this has been addressed, and the Council have recommended the second refusal reason is removed. The proposal is considered to comply with the requirements with Policy CS16 and this is given neutral weight in the planning balance.
- 9.4 The Council consider when weighing these matters in the balance the identified harm and conflict with the development plan would outweigh the substantial economic benefits identified by this proposal.
- 9.5 The appellant's position within the statement of case is that the Council do not have relevant up to date development plan policies regarding the supply of employment land and therefore the tilted balance at paragraph 11(d) should be applied.
- 9.6 Should an Inspector be minded to agree with the appellant's position and that the tilted balance should be applied, the Council will demonstrate that this would not change the outcome because it is considered that paragraphs 11d) i. and 11d) ii of the NPPF would apply to this development due to the identified harm to a heritage asset and significant landscape and visual impacts that would demonstrably outweigh the benefits.

Overall conclusion

- 9.7 The Council recognise that the development would provide significant economic benefits this includes assisting in meeting an industrial and logistics employment land need and the inputs into the economy during construction and operation.
- 9.8 However, the Council will provide evidence that the substantial weight attributed to the landscape and visual harm and the heritage harm arising from the loss of this edge of settlement, greenfield site would outweigh the identified economic benefits. It is considered that the proposed scale of the development would not be appropriate nor compatible for its location outside of the settlement boundary location.

9.9 In conclusion, for the reasons set out within this Statement of Case, the Council considers that the appeal is not in accordance with the development plan, when read as a whole. The starting point, pursuant to S.38(6) TCPA is that permission should be refused. In this case, and whilst the appeal development would bring forward benefits, there are no material considerations that would sufficiently justify a departure from the development plan.

9.10 Accordingly, the LPA will respectfully request that the Inspector dismisses the appeal.

10. Witness topics

10.1 These are the anticipated topics:

- Principle of the development and planning balance
- Logistics and industrial land supply
- Landscape and visual impacts
- Heritage

11. Documents and Core Documents

11.1 The Council will refer to the documents referred to in this Statement of Case, its report and the submitted documentation from all parties as appropriate to date, as well as to other documents that come to the fore.

Appendix 1

Landscape Sensitivity and Capacity Assessment for: THE8: Land off Hoad Way, Theale

Methodology

Basis of methodology

- 1.1 The methodology and assessment criteria used for this assessment are detailed below. The key texts on which methodology is based are the Scottish Natural Heritage and Natural England's *An Approach to Landscape Character Assessment* (2017) and subsequent *Topic Paper 6 Techniques and Criteria for Judging Capacity and Sensitivity* (2006) as well as the Landscape Institute / IEMA *Guidelines for Landscape and Visual Impact Assessment* (2013) (GLVIA).
- 1.2 As in current best practice, sensitivity should be assessed against a specific change, and for this study, a development scenario based on employment use as offices and/or B2 and/or B8, has been assumed for each site as a guide against which sensitivity has been assessed.
- 1.3 Best practice guidance also recognises that a landscape with a high sensitivity does not automatically mean that landscape has a low capacity for change, but that 'capacity is all a question of the interaction between the sensitivity of the landscape, the type and amount of change and the way that the landscape is valued' (*Topic Paper 6, 2006, p12*). The sites have been assessed with the development scenario above in mind. Recommendations and comments have been added regarding the appropriate development of particular sites and to ensure raised awareness of potential unacceptable adverse effects on landscape character.
- 1.4 Proposals for any development would need to include appropriate, detailed and specialist input into siting, layout and design, and a full landscape and visual impact assessment should accompany a specific planning application relating to any site. Other studies including ecology, archaeology, arboriculture, traffic, soils may also be required to accompany specific proposals.
- 1.5 Details of the landscape and visual attributes for each site and an assessment of landscape and visual sensitivity (based on desk top studies and field surveys) are to be found on the Record Sheets

Assessment process

- 1.6 The assessment methodology is a staged process. Landscape attributes (Table 3), and visual attributes (Table 4), are considered separately in accordance with the guidance in GLVIA. These attributes are used to identify the **intrinsic landscape and visual sensitivity** (Stages 1 and 2) of the site, or its sub-areas, on a scale of 5 levels from low to high as set out under the Matrix 1 and 2 below. Then the landscape and visual sensitivity of the site, or its sub-area, are merged to identify the **landscape character sensitivity** (Stage 3) as set out under Matrix 3 below.
- 1.7 The Study goes on to classify the **sensitivity of the site in its wider context** (Stage 4) into five categories. Then in Stage 5 the landscape character sensitivity is combined with the wider sensitivity as set out in Matrix 4 to identify the **overall landscape sensitivity** (Stage 5).
- 1.8 The **landscape value** (Stage 6) of each site, or sub-area, is assessed separately on a scale of 5 levels as set out under Table 5 below. Finally, the overall landscape character sensitivity is merged with the landscape value on a scale of 5 levels to give an assessment of **landscape capacity**

(Stage 7) on a scale of 5 levels as set out under Matrix 5 below. This 'bottom up' process is tested against the five criteria for landscape capacity (Stage 7) based on professional judgement and an overall full understanding of the sites.

Assessment abbreviations and colour code:



– Low Capacity



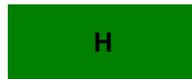
– Medium / Low Capacity



– Medium Capacity



– Medium / High Capacity



– High Capacity

Stage 1: Determination of Visual Sensitivity

- 1.9 This assessment is set out in the Record Sheets and Reports for each site, or sub-division.
- 1.10 The assessment considers the types of **views**, the nature of the **viewers** and the **potential to mitigate** visual impact on the identified viewpoints. The more viewpoints, the more exposed the site, the greater the sensitivity of the viewers (based on GLVIA) and the greater difficulties in screen planting to mitigate the impact without harm to the landscape and visual attributes of the site, the higher the sensitivity. As a final test all the sites were reviewed to assess the relative visual sensitivity of the sites and ensure that professional judgements have been consistent along the way. At this stage each level has been given a score from low = 1 to high = 5 and the scores are added up. Total scores for the site, or sub areas, are grouped as shown.

Matrix 1: Visual sensitivity

General visibility	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Population	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Mitigation	L (1)	M/L (2)	M (3)	M/H (4)	H (5)
OVERALL VISUAL SENSITIVITY	3-4 = low; 5- 7 = Med/low; 8-10 = Med; 11-13 = Med/high; 14-15 = High				

Table 3: Notes on Visual Sensitivity Assessment

Factor	Higher sensitivity	Lower sensitivity
General Visibility	Sequenced and exposed views toward site	Fleeting and limited views
	Most of site area visible	Little of site area visible
	Site is a key focus in available wider views	Site is an incidental part of wider views
	Site includes prominent and key landmarks	No landmarks present
	Important vistas or panoramas in/out of area	Unimportant or no vistas
	Prominent skyline	Not part of skyline
Population	Large extent or range of key sensitive receptors	Lack of sensitive receptors
	Large number of people see site	Few can see site
	Key view from a sensitive receptor	Views of site are unimportant
	Site is part of valued view	Site does not form a part of a valued view
	Site in key views to/across/out of town	Not part of setting of settlement view
Mitigation	Mitigation not very feasible	Mitigation possible
	Mitigation would interrupt key views	Would not obscure key views
	Mitigation would damage local character	Mitigation would not harm local character

Stage 2: Determination of Landscape Sensitivity

- 1.11 This assessment is set out in the Record Sheets and Reports for each site or sub-division.
- 1.12 The assessment considers the **natural** physical factors which make up the landscape character of the site, the **cultural** and built form aspects and the **perceptual** features. The greater the incidence of landscape interest and diversity, historically important features and cultural associations, and the greater the levels of access and perceptions of tranquillity and strong landscape pattern, the greater the sensitivity. As a final test all the sites were reviewed to assess the relative landscape sensitivity of the sites and ensure that professional judgements have been consistent along the way. At this stage each level has been given a score from low = 1 to high = 5 and the scores are added up. Total scores for the site, or sub areas, are grouped as shown.

Matrix 2: Landscape sensitivity

Natural factors	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Cultural factors	L (1)	L/M (2)	M (3)	M/H (4)	H (5)
Perceptual features	L (1)	M/L (2)	M (3)	M/H (4)	H (5)
OVERALL LANDSCAPE SENSITIVITY	3-4 = low; 5- 7 = Med/low; 8-10 = Med; 11-13 = Med/high; 14-15 = High				

Table 4: Notes on Landscape Sensitivity Assessment

Factor	Higher sensitivity	Lower sensitivity
Natural	Native woodland	Plantation
	Significant tree/groups	Insignificant/young trees
	Strong hedgerow structure with hedgerow trees	Weak structure and no trees
	Species rich grassland	Arable field
	Significant water feature(s)	No water feature(s)
	Varied landform and distinctive feature of the area	Uniform landform and lack of topographical features
	Pronounced Geology	Lack of geological features
	Soils significantly contribute to landscape features	Soils are not an important feature
	Complex and vulnerable landcover	Simple robust landcover
	Presence of other significant vegetation cover	Absence of other significant vegetation
	Presence of valued wildlife habitats	Absence of valued wildlife habitats
	Significant wetland habitats and meadows	Poor water-logged areas
	Presence of common land	No common land
	Presence of good heathland	Lost heathland
Cultural	Distinctive good quality boundary features	Generic or poor boundary features
	Evidence of surviving part of an historic landscape	No evidence
	Complex historic landscape pattern with good time depth	Simple modern landscape
	Evidence of historic park	No evidence
	Important to setting or in a Conservation Area	No relationship
	Includes a Scheduled Ancient Monument or Important to setting	No relationship
	Locally distinctive built form and pattern	Generic built form
	Important to setting of a Listed building	No relationship
	Distinctive strong settlement pattern	Generic or eroded pattern
	Locally significant private gardens	Poorly maintained gardens erode the character
	Evidence of visible social cultural associations	Lack of social cultural associations
Perceptual	Quiet area	Noisy area
	Absence of intrusive elements	Intrusive elements present
	Dark skies	High levels of light pollution
	Open exposed landscape	Enclosed visually contained landscape
	Unified landscape with strong landscape pattern	Fragmented/'bitty' or featureless landscape
	Well used area or appreciated by the public	Inaccessible by public
	Important rights of way	None present
	Well used and valued open air recreational facilities	None present
	Open access land	None present

Stage 3: Determination of Landscape Character Sensitivity

1.13 The landscape sensitivity and visual sensitivity are combined, as shown in Matrix 3, to give the **landscape character sensitivity**. The results of the assessment are set out in the Reports for each site or sub-division.

Matrix 3: Landscape character sensitivity

VISUAL SENSITIVITY	High	M	M/H	M/H	H	H
	Med/High	M/L	M	M/H	M/H	H
	Medium	M/L	M/L	M	M/H	M/H
	Med/Low	L	M/L	M/L	M	M/H
	Low	L	L	M/L	M/L	M
	Low	Med/Low	Medium	Med/High	High	
LANDSCAPE SENSITIVITY						

Stage 4: Determination of Wider Sensitivity – The Contribution of the Site to the Wider Landscape and adjacent Employment Uses and Settlement Edge Pattern

1.14 Stages 1 to 3 have led to a comprehensive assessment of the intrinsic landscape sensitivity of the individual sites. However, the sensitivity of each site to development is also affected by its importance, and contribution, to the adjacent wider rural landscape, its contribution to the setting and form of existing settlement - and the influence of, and pattern of uses adjacent. The relative wider sensitivity of each site is assessed as follows:

Low wider sensitivity – The site is heavily influenced by the built form of adjacent employment uses and existing settlement and is not an important part of the adjacent wider landscape

Medium/Low wider sensitivity – The site is heavily influenced by the existing settlement and has views of some parts of the adjacent employment sites but shares some of the characteristics of the adjacent wider landscape

Medium wider sensitivity – The site is partly influenced by the existing settlement and adjacent employment uses but shares many of the characteristics of the wider landscape, with good physical and visual links to the wider landscape

Medium/High wider sensitivity – The site has strong physical and visual links to the wider landscape and these outweigh any minor impacts from the existing settlement and adjacent employment uses

High wider sensitivity – The site is an important part of the wider landscape with which it has strong visual and landscape links. Nearby settlement and employment uses have little impact on the site.

1.15 The results of the assessment are set out in the reports for each site or sub-division.

Stage 5: Determination of Overall Landscape Sensitivity

1.16 The **overall landscape sensitivity** is determined by combining the landscape character sensitivity with the wider sensitivity as shown in Matrix 4. The results of the assessment are set out in the Report Sheets for each site or sub-division.

Matrix 4: Overall landscape sensitivity

LANDSCAPE CHARACTER SENSITIVITY	High	H	H	M/H	M/H	M
	Med/High	H	M/H	M/H	M	M/L
	Medium	M/H	M/H	M	M/L	M/L
	Med/Low	M/H	M	M	M/L	M/L
	Low	M	M	M/L	M/L	L
		High	Med/High	Medium	Med/Low	Low
WIDER SENSITIVITY						

Stage 6: Determination of Landscape Value

1.17 The model for this work follows GLVIA 2013.

Table 5 - LANDSCAPE VALUE CRITERIA

Value	Typical criteria	Typical scale	Typical examples
High	Very High importance (or quality) and rarity. No or limited potential for substitution	International	World Heritage Site SAC
Medium/high	High importance (or quality) and rarity. Limited potential for substitution	National	National Park/ AONB SSSI EH Register of Parks and Gardens Grade I and II* listed buildings and their settings National recreational route or area e.g. Chiltern Way
Medium	Medium importance (or quality) and rarity. Limited potential for substitution	Regional	Setting of AONB / National Park Regional Park (i.e. Colne Valley) Local landscape designation Landscape value identified in the Local Plan SINC/Conservation Areas and their setting Grade II listed buildings and their setting Local Wildlife sites Regional recreational route/area e.g. South Bucks Way
Medium/low	Local importance (or quality) and rarity. Limited potential for substitution	Local	Undesignated but value expressed through publications such as Village Design Statements Local buildings of historic interest and their settings Local recreational facilities of landscape value
Low	Low importance (or quality) or rarity		Area of little value and identified for improvement

Designations: The location of the site within a designated area, or the presence of a designated area within the site, is an important measure of the value society gives to the landscape of the site. These include landscape, historic and ecological designations and recreational routes at a national/international level, regional or district level, or at the local level.

Local Associations: These are included as far as possible using available data. In addition to the more formal designations above, sites may sometimes have special scenic value, associations or meanings to the local community and therefore make a contribution to the value of the local landscape. This has

been assessed through a review of readily available evidence of community value. Further research may be required as part of any detailed landscape and visual impact assessment.

Stage 7: Determination of Landscape Capacity

1.17 Landscape capacity is the ability, or otherwise, of the sites to accommodate a certain amount of development. The landscape capacity is determined by combining the overall landscape sensitivity with the landscape value as shown in Matrix 5. The results of the assessment are set out in the Report Sheets for each site or sub-division.

Matrix 5 LANDSCAPE CAPACITY

OVERALL LANDSCAPE SENSITIVITY	High	M	M/L	L	L	L
	Med/High	M/H	M	M/L	L	L
	Medium	H	M/H	M	M/L	L
	Med/Low	H	H	M/H	M	M/L
	Low	H	H	H	M/H	M
	Low	Med/Low	Medium	Med/High	High	
	LANDSCAPE VALUE					

1.18 The results from the matrix are subsequently tested against the following classifications for each level of landscape capacity, building on classifications used by the authors of this Report for other capacity studies.

Low capacity – The landscape could not accommodate areas for employment uses without a significant and adverse impact on the landscape character and visual amenity. Occasional, very small-scale employment uses may be possible, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Medium / Low capacity – A low amount of development for employment uses can be accommodated only in limited situations, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Medium capacity - The landscape could be able to accommodate areas of new development for employment uses in some parts, providing it has regard to the setting and form of existing settlement and the character and sensitivity of adjacent landscape character areas. There are landscape and visual constraints and therefore the key landscape and visual characteristics must be retained and enhanced.

Medium/ High capacity – The area is able to accommodate larger amounts of development for employment uses, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas. Certain landscape and visual features in the area may require protection.

High capacity – Much of the area is able to accommodate significant areas of development for employment uses, providing it has regard to the setting and form of existing settlement and the character and the sensitivity of adjacent landscape character areas.

Stage 8: Determination of Landscape Capacity within the Site

- 1.19 Each site report contains an overall plan showing the landscape capacity classification of the site at the beginning of the site report; and an overall plan showing the extent of the site recommended for further consideration as a site and the recommended location
- 1.20 Each site is examined in detail to determine the potential area for development for employment uses in the light of the landscape capacity and landscape and visual constraints on the site. In some cases, the whole site will be ruled out for development. In others the whole site will be included as a potential site, subject to the provision of Green Infrastructure. However, in many cases we recommend a 'reduced area' which identifies a part of the site that could be considered further as a potential site subject to the provision of Green Infrastructure. The 'reduced area' is that part of the site that could be developed whilst conserving (and potentially in some cases indirectly enhancing) the key landscape and visual characteristics of the site and its landscape setting; and whilst conserving and reinforcing the influence of the underlying landscape on the settlement pattern of the adjacent town or village. The policy constraints affecting sites within the AONB have also been taken into account.
- 1.21 Study Constraints
1. The sites have largely been assessed from publicly accessible viewpoints including the local road network, public rights of way, public open space and other publicly owned land. There was no access to the sites.
 2. Site photographs included in this study are representative of key views of the site.
 3. Views from the surrounding countryside or urban areas have been assessed by noting intervisibility from within or adjacent to the site, but the Study does not include an assessment of the potential zone of visual influence of any development on each site.
 4. The majority of study fieldwork was undertaken in July 2021 with summer vegetation.
 5. A development scenario of employment uses - offices and/or B2 and/or B8 has been assumed,
 6. Time limitations have meant that no public consultation has taken place during the Study.

WEST BERKSHIRE COUNCIL CAPACITY STUDY 2021 RECORD SHEET

Site:	THE8: Land off Hoad Road, Theale
Date of site survey:	17.07.2021
Surveyors:	LA
Weather/visibility:	Clear

LCA:

West Berkshire Landscape Character Assessment 2019 *LCA RO1: Kennet Lower River with Open Water*

Key Characteristics

- Broad, open valley of the River Kennet, underlain by chalk geology with gravel and sand deposits
- Land use dominated by gravel pit lakes, industry and transport infrastructure
- Former gravel pits and flood plain habitats are locally important for wildlife
- A modern landscape dominated by transport corridors and gravel extraction with surviving small scale heritage features
- Settlement in the area is sparse, excepting the large historic village of Theale
- Transport links are a dominant feature, particularly the M4, railway and canal
- Destination for formal and informal recreation activity
- Often visually enclosed by woodland, with views opening out over the lakes
- Tranquillity is limited by the motorway and nearby urban development

Valued Features and Qualities

- Semi-natural habitats associated with distinctive gravel pit lakes
- Sparse settlement pattern
- The historic village of Theale
- Important provision of recreational amenity
- Historic transport routes including the railway and canals

Detractors

- Past and present gravel pit extraction resulting in an industrialised landscape
- Large-scale transport infrastructure
- Upgrading of rural roads
- Fragmented and degraded remaining agricultural land
- Pressure for new development
- Prominent large-scale buildings

Landscape Strategy

- Continue to promote the appropriate restoration of former gravel pits
- Conserve and enhance hedgerows, woodland strips and remaining areas of pasture
- Respect the setting of historic features within the landscape
- Maintain distinction and sense of separation between the settlements of Theale and Calcot
- Mitigate the adverse influence of major transport infrastructure and maintain character of rural lanes

An Integrated Landscape Sensitivity Approach to Settlement Expansion within West Berkshire May 2009

LLCA20E: Theale – Calcot Gap is divided into 4 unequal quarters, two of which comprise open land and two of which are covered by commercial development.

Key elements of landscape sensitivity

- Recent new landscapes (such as Arlington Park) have created a more positive, ornamental landscape setting
- Remnant fields and tree cover
- Several local landmarks, set within un-cohesive built form
- Visually exposed to views from higher ground and settlement edge
- Geological SSSI
- Undulating topography falling to the valley floor which has been significantly altered by highway infrastructure
- Distinctive modern commercial built form
- Dominance of highway infrastructure
- Generally poor landscape structure

- Wider landscape: The open landscape quarters of LLCA20E Theale – Calcot Gap link through to the Kennet Valley landscape of 8F in the east and the farmed landscape of 16A to the north west. There is a strong landscape and visual link between 16A and the north west quarter. The south east quarter has more in common with south 14J from which it is separated by the A4 infrastructure but it has good visual links with 8F.
- Setting to the urban form: LLCA20E: Theale – Calcot Gap separates Theale from Reading but includes substantial areas of commercial development straddling the M4 junction. This differs in character from the residential townscape of both Theale and Calcot and together with the open space defines the gap. The open land retains the perception of separation between the two settlements.

Landscape Sensitivity Assessment of Potential Strategic Development Sites - May 2009

The site is located in Area 11: East Theale which covers the south-eastern corner of LLCA16A and north-west quadrant of 20E.

Although the landscape sensitivity is low in 20E, it is essential to maintaining the remaining physical and visual gap between Theale and Calcot. Its narrow width is reinforced by its link to the south-east quadrant and to 16A. It is recommended that only a very small section of the north-west quadrant of 20E, north

of Hoad Way and no further east than the current built form edge of Theale, be considered as a strategic option site if the gap is to be maintained.

North Wessex Downs AONB LCA 2002: Character Area 8A Hermitage Wooded Commons

The site is located within the setting of the North Wessex Downs AONB

Key management requirements:

- The overall management requirement is conserve and enhance the quiet secluded character of the LCA 8A: Hermitage Wooded Commons
- The aim also should be to maintain the distinctive pattern of settlement with its small hamlets and loose linear settlements and prevent the gradual merging and coalescence that will result in a more suburban character.

LCA of potential housing sites within and adjacent to the North Wessex Downs AONB – Theale – August 2015

Summary of the key characteristics of the settlement and landscape constraints on the extent and location of development - Theale lies on the valley floor on the slightly higher ground above the River Kennet. Commercial development is concentrated south of the A4 with housing and village facilities extending north of the A4 into the open landscape in the southern part of LLCA16A: Englefield Wooded Farmlands. A triangle of open countryside north of Theale, between the A340 to the west (at the foot of the Englefield AONB escarpment) to the M4 to the east (at the foot of the Sulham AONB escarpment), lies outside of the AONB but provides a rural setting to the AONB and interface between the two areas of the AONB.

Landscape designations:

The site is located within the setting of the North Wessex Downs AONB
The site is located partly within and adjacent Theale Conservation Area

VISUAL SENSITIVITY

<i>General visibility</i>	<i>Population</i>	<i>Mitigation potential</i>
<p>Views into the site from: Bath Road to the south Western part of Junction 12 of the M4 Hoad Way to the west High Street to the north Public Right of Way to the north Open space to west of junction of Woodfield Way and High Street (within Conservation Area)</p>	<p>Types of viewers: Walkers, residents and vehicle travellers</p>	<p>Opportunities for mitigation and landscape compatibility of mitigation: Screen planting or site boundary planting could compromise the open character of the site and subsequent settlement setting and identity of Theale from Calcot</p>
<p>Views out of the site to: The settlement edge of Theale Bath Road on embankment M4 wooded embankment (M4 not visible) Wooded Sulham Ridge within the AONB Winter views include to fragmented parts of the buildings east of the M4 including Ikea</p>	<p>Magnitude of viewers (level of use and popularity): Bath Road to the south - High Western part of Junction 12 - high Hoad Way to the west - high High Street to the north, which provides access across the M4 to Calcot - medium Public Right of Way to the north – medium Open space to west of junction of Woodfield Way and High Street (within Conservation Area) - medium</p>	<p>Impacts of mitigation: High – Would screen view of setting of Theale and wider views to Sulham Ridge within the AONB to the north east</p>
<p>Does the site form part of a skyline? No</p>	<p>Visual perceptions (activity and expectations of local visual receptors): Rural setting of Theale and separate identity from Calcot</p>	
<p>Panoramic views: Open view across whole site from Junction 12 roundabout</p>		
<p>Landmark features: None</p>		
<p>Sensitivity score: High</p>	<p>Sensitivity score: High</p>	<p>Sensitivity score: High</p>
<p>Visual sensitivity score: High</p>		
<p>Additional comments: The site is in a prominent location, visible from the north, south and east on the approach into Theale</p>		

LANDSCAPE SENSITIVITY

<i>Natural factors</i>	<i>Cultural factors</i>	<i>Perceptual features</i>
<p>Topography and landform: Flat at around 45m AOD</p>	<p>Boundary features other than vegetation: Highway timber post and rail fence along the western and southern site boundary Boundary walling and gable ends of adjacent properties within north west corner of site</p>	<p>Tranquillity – Noise levels: Traffic noise from M4 and Bath Road</p>
<p>Geological features: None</p>	<p>Historic landscapes: No historic features on site</p>	<p>Tranquillity – Visual intrusion / detractors: M4 well screened by intervening trees and shrubs. Overhead power lines detract from views east Bath Road semi screened PEA-Arlington Business Park screened from view, by Bath Road embankment/tree planting</p>
<p>Soil quality: Natural England: <i>Grade 3 Good to moderate</i></p>	<p>Parkland features: None</p>	<p>Tranquillity – Light pollution/dark skies: As per CPRE Light Pollution and Dark Skies map the site is located within the brightest category (>32 nanowatts/cm2sr)</p>
<p>Water features: Field ditch across site as part of a network of ditches/stream flowing south into the River Kennet as shown on the OS map, although probably realigned underground</p>		
<p>Landcover and land use: Fallow grassland – presently ungrazed</p>	<p>Conservation Area: Site slightly within but mainly adjacent to Theale Conservation Area to the west</p>	
<p>Tree belts, individual trees and riverside trees: Groups of trees within southern corner of site, which then continue beyond the site boundary onto the embankment of the Bath Road</p>	<p>Landscape features of LCA: The site is a pocket of isolated agricultural grassland Impact of the M4 from noise, however not visible from site. Overhead electricity infrastructure and pylon visible within site Adjacent historic town of Theale and Conservation Area, where the site is visible from Located within open landscape between Theale-Calcot, highlighted as an area where pressure for new development is ongoing</p>	

Landscape Sensitivity and Capacity Assessment for potential employment sites within West Berkshire

<p>Hedgerows and hedgerow trees: Northern boundary adjacent the High Street aligns a mature field hedgerow Southern boundary adjacent Hoad Way is aligned with a wide hedgerow</p>	<p>Built form: Pylon Telecommunication Mast fenced off</p>	<p>Accessibility by public footpath: None</p>
<p>Woodland and copses: Small woodland copse within southern corner of site adjacent Bath Road and Hoad Way roundabout</p>	<p>Setting of listed buildings: Nearest (125m) listed building is No 49 the High Street</p>	<p>Open access areas: None</p>
<p>Wetland and meadow: The fallow grassland has a meadow character The area within the southern corner had a damp grassland character indicated by reeds and standing water in March 2020</p>	<p>Scheduled Monuments: None</p>	<p>Recreational areas: None</p>
<p>Common land: None</p>	<p>Settlement pattern: Adjacent settlement boundary of Theale. Also, partly within and adjacent to Theale Conservation Area, where the open character contributes to Theale's historic setting Separated from PEA (Arlington Business Park) by Bath Road embankment</p>	
<p>Heathland: None</p>	<p>Contribution of private gardens to landscape character: N/A</p>	<p>Aesthetic sensitivity - Elements of openness/enclosure: Open character</p>
<p>Other significant vegetation cover: None</p>	<p>Cultural associations: None known</p>	<p>Aesthetic sensitivity – landscape pattern: Part of the open setting of Theale and key to its separate identity from Calcot and Reading Separate from Arlington Business Park by wooded embankment of M4 and Bath Road embankment</p>

Landscape Sensitivity and Capacity Assessment for potential employment sites within West Berkshire

<p>BAP/Phase 1 records: Northern hedgerow would qualify as a Habitat of Principle Importance as stated within the Preliminary Ecological Appraisal undertaken in September 2019 on the site by Middlemarch Environmental</p>	<p>Features of cultural importance: None known</p>	
<p>Presence of SSSI/SINC/local wildlife designation/Semi-Natural Ancient Woodland: None known</p>		
<p>Sensitivity score: Medium</p>	<p>Sensitivity score: High</p>	<p>Sensitivity score: Medium</p>
<p>Landscape sensitivity score: Medium/high</p>		
<p>Additional comments: The site forms an important open area, which relates to Theale contributing to its open setting. Physically and visually separated from the nearest PEA by treed road embankments</p>		

Relationship with the wider landscape/Protected Employment Areas

Adjacent Protected Employment Area and Settlement:

A small length of the site boundary is located against the settlement boundary of Theale. Also, a small part of the site is located within Theale Conservation Area, but mainly the site is set adjacent. The site forms part of the open landscape character and open setting for Theale and the Conservation Area as well as contributing to the separate identity of Theale from Calcot to the east

The PEA, Arlington Business Park - on the southern side of the Bath Road is separated from the site by the road embankment, which also contains areas of trees further contributing to this embankment as a visual barrier

Character of the PEA and settlement edge:

The character of this PEA off Waterside Drive known as Arlington Business Park includes a central area with two lakes, areas of amenity grassland and tree planting; leading off from this central landscaped area are tree lined roads and car parking areas with further tree planting. Buildings are generally three storeys, business in usage, rather than industrial or shed like in style. To the west of Arlington Business Park, the PEA is more compact in density, with less tree planting and includes larger industrial style buildings

In contrast to this large scale, in Theale itself residential properties north of the High Street front the site, sitting behind a grass verge with trees and hedgerows contributing to a soft settlement edge. The settlement edge character of the properties south of the High Street and adjacent the site in part creates a hard edge with boundary walls and buildings

Presence in a floodplain:

Flood Zone 2: except for a small area on the northern boundary where the mast is located, the site is covered by Flood Zone 2

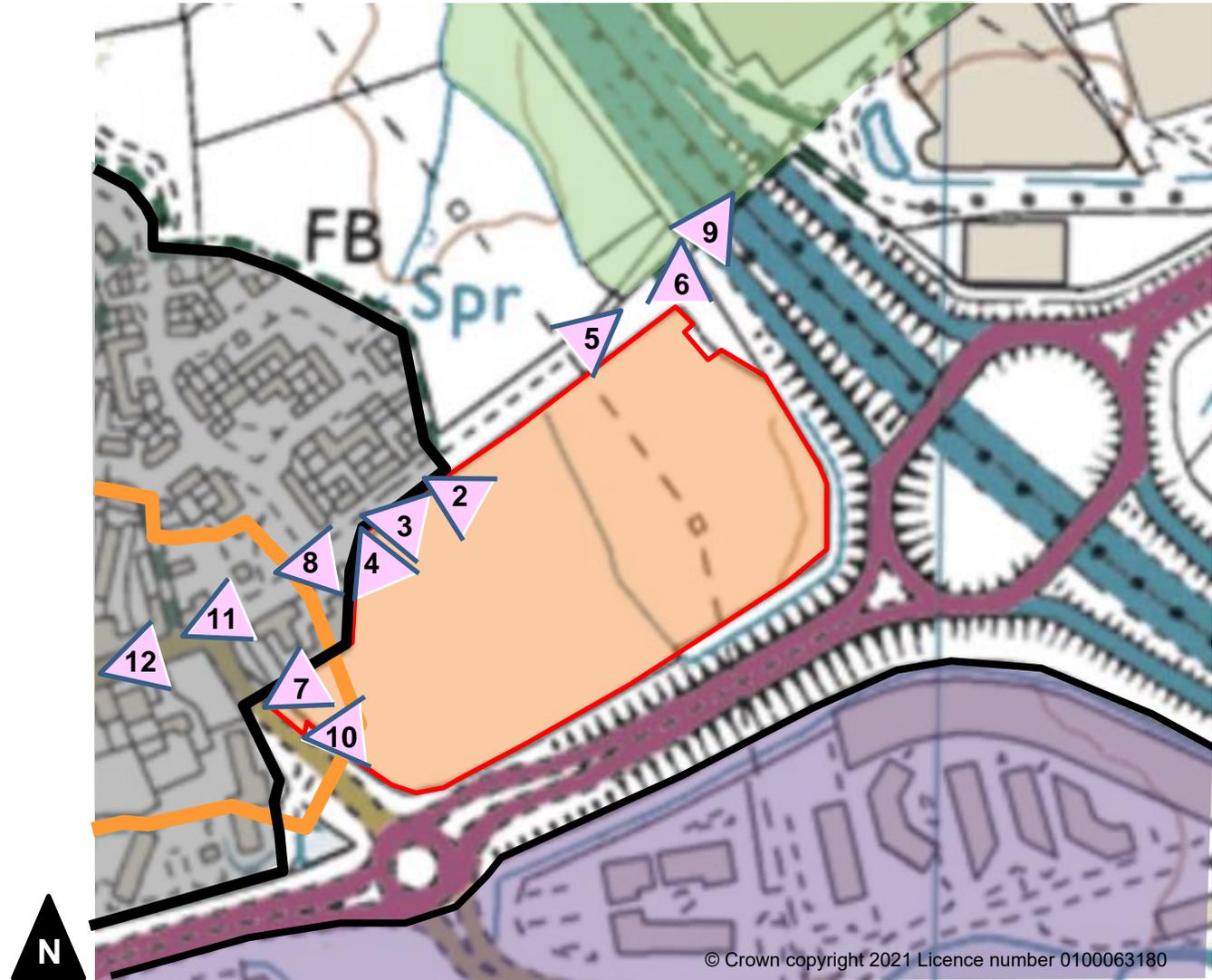
Relationship with adjacent wider countryside:

From the eastern part of the site, open countryside continues to the north across the High Street and into the North Wessex Downs AONB

<p>Character of adjacent village(s)/towns: The settlement of Theale was originally a linear settlement aligning along the High Street in a NNE SWW direction. From the late 1960's ribbon development characterised a number of the northern approach roads to the High Street. From the late 1970's infill housing development between these approach roads changed the character of Theale to a more nucleated form. However, the High Street still retains a strong historic character, which forms the present Conservation Area containing a high concentration of Listed Buildings</p> <p>The eastern end of the High Street has always been characterised by the open countryside which contributes to the open setting of the Conservation Area. This open setting can be appreciated as one approaches Theale from the Bath Road, down onto Hoad Way and onto the High Street</p>
<p>Historic links with the wider area if known: None</p>
<p>Ecological links with the wider area if known: Part of a Biodiversity Opportunity Area</p>
<p>Recreational links with the wider area: The High Street which aligns with the northern boundary of the site continues onto a Public Right of Way (by bridge over the M4) located within the North Wessex Downs AONB</p>
<p>VDS/Parish Plan – relevant extracts: None</p>

Figure 1: Site: THE8: Land off Hoad Way, Theale

-  Site boundary
 -  Protected Employment Area
 -  Theale Conservation Area
 -  North Wessex Downs AONB
 -  Theale settlement boundary
 -  Viewpoint photo
- Landscape capacity**
-  High capacity
 -  Medium/high capacity
 -  Medium capacity
 -  Medium/low capacity
 -  Low capacity



West Berkshire Landscape Character Assessment 2019

The site lies within *LCA RO1: Kennet Lower River with Open Water*. The landscape strategy for this LCA is set out below:

Landscape Strategy

- Continue to promote the appropriate restoration of former gravel pits
- Conserve and enhance hedgerows, woodland strips and remaining areas of pasture
- Respect the setting of historic features within the landscape
- Maintain distinction and sense of separation between the settlements of Theale and Calcot
- Mitigate the adverse influence of major transport infrastructure and maintain character of rural lanes

An Integrated Landscape Sensitivity Approach to Settlement Expansion within West Berkshire LDF- May 2009

The site lies within the following LLCA20E: Theale-Calcot Gap for which states:

Setting to the urban form LLCA20E: Theale – Calcot Gap separates Theale from Reading but includes substantial areas of commercial development straddling the M4 junction. This differs in character from the residential townscape of both Theale and Calcot and together with the open space defines the gap. The open land retains the perception of separation between the two settlements.

Landscape Sensitivity Assessment of Potential Strategic Development Sites - May 2009

The site is located in Area 11: East Theale which covers the south-eastern corner of LLCA16A and north-west quadrant of 20E. Although the landscape sensitivity is low in 20E, it is essential to maintaining the remaining physical and visual gap between Theale and Calcot. Its narrow width is reinforced by its link to the south-east quadrant and to 16A. It is recommended that only a very small section of the north-west quadrant of 20E, north of Hoad Way and no further east than the current built form edge of Theale, be considered as a strategic option site if the gap is to be maintained.

North Wessex Downs AONB LCA-2002: Character Area 8A Hermitage Wooded Commons

The site is located within the setting of the North Wessex Downs AONB

Key management requirements:

The overall management requirement is conserve and enhance the quiet secluded character of The Hermitage Wooded Commons. The aim also should be to maintain the distinctive pattern of settlement with its small hamlets and loose linear settlements and prevent the gradual merging and coalescence that will result in a more suburban character.

LCA of potential housing sites within and adjacent to the North Wessex Downs AONB – Theale – August 2015

Summary of the key characteristics of the settlement and landscape constraints on the extent and location of development - Theale lies on the valley floor on the slightly higher ground above the river Kennet. Commercial development is concentrated south of the A4 with housing and village facilities extending north of the A4 into the open landscape in the southern part of LLCA16A: Englefield Wooded Farmlands. A triangle of open countryside north of Theale, between the A340 to the west (at the foot of the Englefield AONB escarpment) to the M4 to the east (at the foot of the Sulham AONB escarpment), lies outside of the AONB but provides a rural setting to the AONB and interface between the two areas of the AONB.

Site description:

The site constitutes a large grass field which has been left fallow. At the southern end of the site are areas of regenerating scrub with some small trees. A hedgerow aligns its north western boundary. Other site boundaries are defined by a highway timber post and rail fence. A small part of the site is set within Theale Conservation Area, but the site is mainly set adjacent. Part of the site boundary also aligns the settlement boundary of Theale. The site is separated from the Arlington Business Park to the south by the Bath Road which is located on an elevated embankment. The embankment and tree planting visually and physically separate the site from this Protected Employment Area. The site is visible in its entirety for a range of visitors and residents as they approach Theale.

Key landscape planning factors:

The site is located as follows:

- Within the setting of the North Wessex Downs AONB
- Partly within and within the setting of Theale Conservation Area
- Within the setting of Theale
- Outside and separate from the Protected Employment Area to the south

Viewpoints:

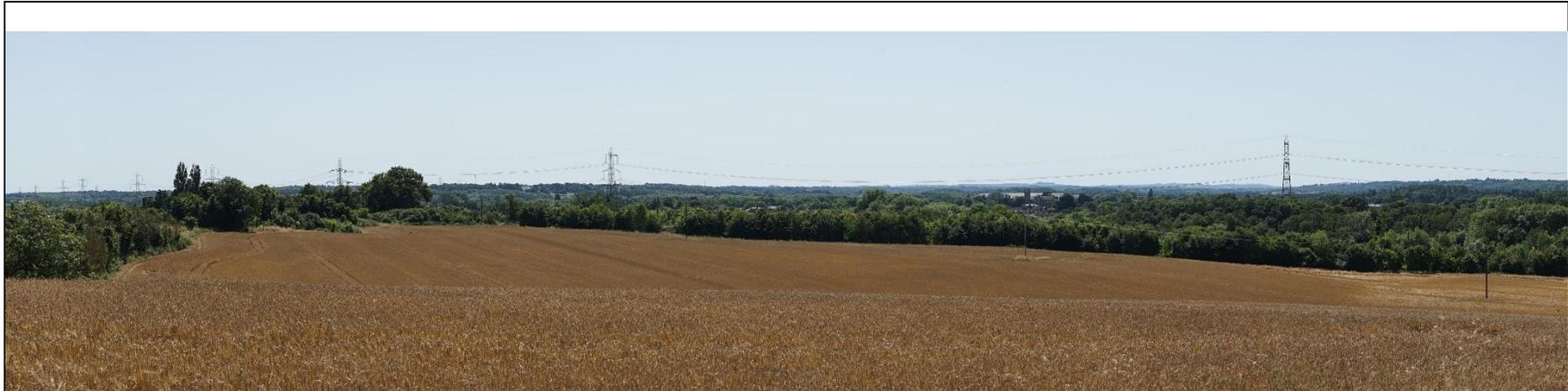


Photo 1: Summer view from a Public Right of Way within the North Wessex Downs AONB, looking towards the site. The wooded character of the Kennet valley screens/integrates existing built development into the landscape preserving a wooded setting for the adjacent AONB and views from Folly Hill. The church at Theale is visible above the treeline. The site is screened by intervening trees (July 2021)



Photo 2: View from the High Street across the site to the Bath Road, located on an embankment. Arlington Business Park is located further to the south of the Bath Road, which is not visible from this location (July 2021)



Photo 3: From the High Street looking east across the site to Junction 12 (M4) on embankment (July 2021)



Photo 4: From the High Street looking south across the site to the Bath Road screened by highway trees on the embankment (July 2021)



Photo 5: From the High Street looking west towards Theale with the site boundary hedgerow to the left (July 2021)



Photo 6: From the Public Right of Way on the M4 overbridge, looking towards the site, visible as an open field, enclosed by the treed embankment of the Bath Road



Photo 7: From the pedestrian pavement adjacent Hoad Way, looking across the site to the wooded embankment which contains the M4 and provides a visual link to the wooded Sulham ridge within the AONB. The open grassed part of the embankment (to the right) allows views back across the site from Junction 12 (July 2021)



Photo 8: From the Conservation Area and edge of open space west of Woodfield Way looking towards the site (July 2021)



Photo 9: From the Public Right of Way on the M4 pedestrian overbridge looking across to the site to the left (March 2020)



Photo 10: From Hoad Way looking across the site to the eastern site boundary and the wooded Sulham Ridge beyond within the North Wessex Downs AONB, parts of the 'blue' Ikea building (east of the M4) are just visible within the trees (March 2020)



Photo 11: From the High Street within the Conservation Area, looking towards the site (March 2020)



Photo 12: From the High Street within the Conservation Area, looking towards the site (March 2020)

Please refer to section 3 methodology of the assessment process

1. **Visual Sensitivity: High**
 - Most of the site area visible from public adjacent areas
 - Within the summer months there is no intervisibility with the site and Arlington Business Park to the south of the Bath Road, due to the intervening embankment which along with its tree planting creates a screen
 - The site forms part of key views out of Theale and part of the setting of settlement views
 - Visible from Theale Conservation Area
 - Large number of people, as visitors, travellers and residents to Theale can see the site
 - Although the site itself might not be visible from areas within the AONB, large scale development would be partly visible from areas adjacent Wilders Folly and areas to the west around Englefield Park, both within the AONB

2. **Landscape Sensitivity: Medium/High**
 - Open area of fallow grassland contributing to the setting and separation of Theale from Calcot
 - A small part is located within Theale Conservation Area, but mainly aligns, therefore contributing to the setting of the Conservation Area and listed buildings
 - Traffic noise as in close proximity to M4
 - Visually intrusive pylon with overhead cables

3. Landscape Character Sensitivity: High (combines 1 and 2)

4. **Wider Landscape Sensitivity: Medium**
 - The site is part of the open land between Calcot and Theale, although influenced by the adjacent settlement of Theale, the open character of the site and its connection to the wider undeveloped landscape is important to the setting of Theale and its separate identity to Calcot

5. Overall Landscape Sensitivity: Medium/high (combines 3 and 4)

6. **Landscape Value: Medium**
 - A small part is located within, but mainly forms part of the setting of Theale Conservation Area
 - Setting of North Wessex Downs AONB
 - Local importance as part of undeveloped land forming a physical and perceptual separation between Calcot and Theale
 - Visually and physically separate from the Protected Employment Area south of the Bath Road

7. Landscape Capacity: Medium/low (combines 5 and 6)

Relationship of site to Theale

- The site contributes to an important part of the remaining open countryside and the subsequent separation of Theale from Calcot
- The site is visible from within Theale (and the Conservation Area), where the open character of the site contributes to Theale's historic character and setting
- Only a small part of the site aligns the settlement boundary of Theale
- A small part of the site is located within Theale Conservation Area, with the rest adjacent and within the setting of Theale Conservation Area
- The site is visible in its entirety on the eastern approach road (Hoad Way) into Theale

Relationship of site to Protected Employment Area (PEA)

- The site is separated from Arlington Business Park by the Bath Road which is located on a partly treed embankment
- Due to the lack of intervisibility with the site and PEA, the landscape character of the site retains a more rural character, contributing to the setting and separate identity of the historic village of Theale

Relationship with adjacent wider countryside

- The site is part of the open countryside which continues further to the north and across the M4 into the North Wessex Downs AONB
- Continuation of an open area which separates Theale from Calcot

Potential impact on key landscape characteristics

- Loss of agricultural grassland - pasture
- Loss of surface water and streams
- Development across the whole site would result in coalescence with Calcot and loss of separate identity of the historic village of Theale from Calcot
- Noise levels are already compromised by the proximity to the M4, however the introduction of lorries and heavy vehicles in closer proximity to Theale will exacerbate the noise levels
- The introduction of offices and/or other large-scale buildings on this side of the A4 would be out of scale and keeping with the historic village character of Theale

Potential impact on key visual characteristics

- A visible site, where views of the separate loss of separate identity of Theale from Calcot would be experienced by a large number of travellers (walkers, vehicle users)
- Loss of separate identity and open setting of Theale as experienced and viewed from the Public Right of Way set within the AONB to the north west

Potential impact on key settlement characteristics

- Development over the whole site would create the perception of coalescence of Theale with Calcot and the loss of their separate settlement identities
- Loss of semi-rural setting as viewed from within Theale
- Large-scale buildings on this prominent site would have a detrimental impact on the settlement edge character of Theale and its Conservation Area

Potential impact on the North Wessex Downs AONB

- There are some close-range views from the Public Right of Way on the M4 overbridge set within the AONB
- Development including large scale buildings would be visible from elevated areas within the AONB to the north of the site (Wilders Folly) and west of the site (Englefield Park)

Landscape mitigation and contribution to green infrastructure

- Not applicable

Conclusion and recommendations

If this site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It is therefore recommended the site is not developed for employment uses. Although not considered suitable for employment uses, opportunities could be explored through green infrastructure on the site to see if it could make a positive contribution towards enhancing the setting of Theale in conjunction with any development on THE1.

-  The site
-  With potential for development
-  Considered inappropriate for development

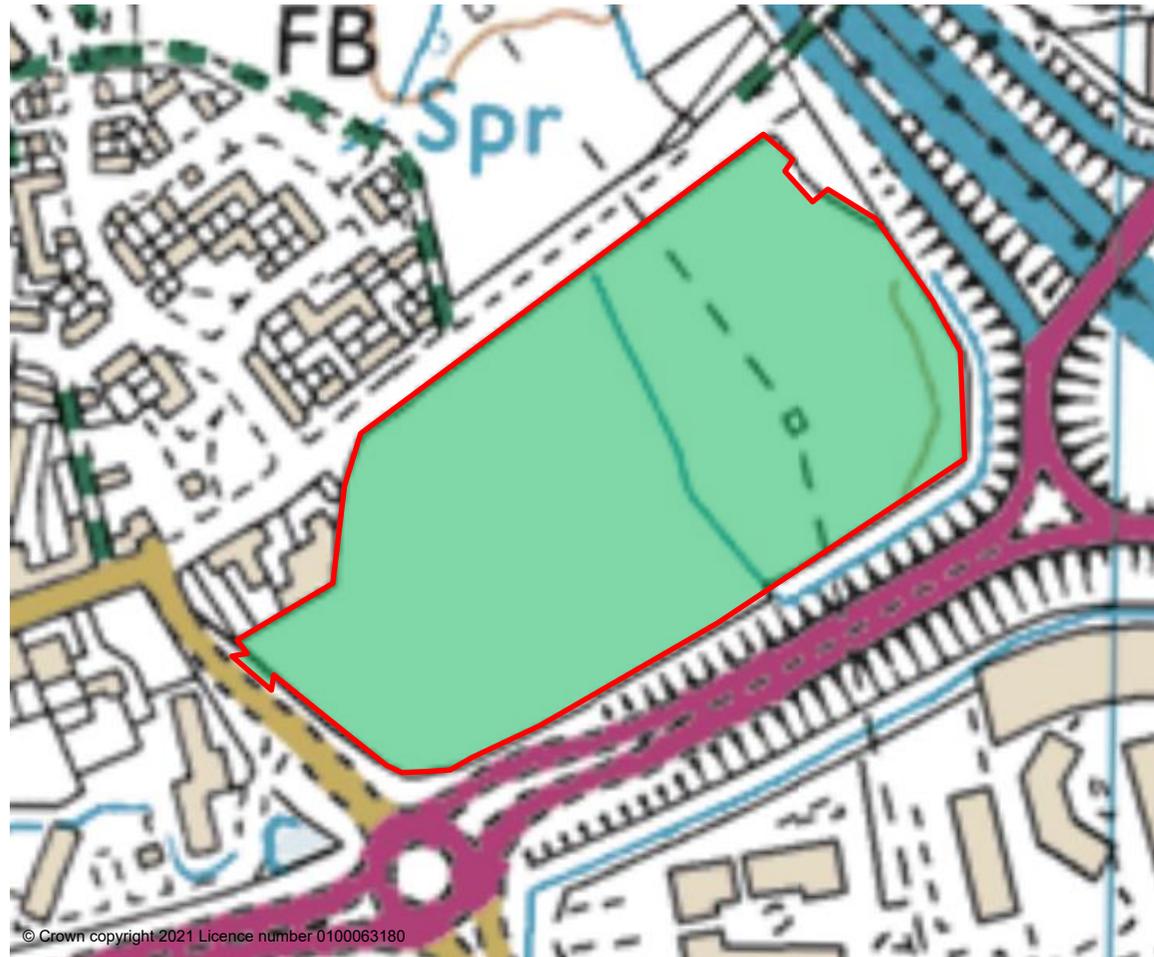


Figure 2: Site: THE8 : Land east of Hoad Way: Recommended developable site area

Appendix 2

WEST BERKSHIRE COUNCIL

PLANNING APPLICATION NO24/00145/FULMAJ

FULL PLANNING APPLICATION FOR THE CONSTRUCTION OF 2 EMPLOYMENT UNITS FOR FLEXIBLE USES WITHIN CLASS E (LIGHT INDUSTRIAL), B2 AND/OR B8 OF THE USE CLASSES ORDER (INCLUDING ANCILLARY OFFICE PROVISION) WITH ASSOCIATED ENABLING WORKS, ACCESS FROM HOAD WAY, PARKING AND LANDSCAPING. LAND BOUNDED BY HOAD WAY AND M4 AND HIGH STREET THEALE READING

1. INTRODUCTION - HISTORY OF THE SITE:

- 1.1 A Planning application 20/00476/OUTMAJ, was submitted in 2020, then withdrawn, with a new application submitted a year later, 21/02029/COMIND: which was then also withdrawn.
- 1.2 Within the document: *Landscape Sensitivity and Capacity Assessment for potential employment sites within West Berkshire*, for this site (ref THE8) It was concluded that the site was not suitable for development with a conclusion and recommendations as follows:

If this site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It is therefore recommended the site is not developed for employment uses. Although not considered suitable for employment uses, opportunities could be explored through green infrastructure on the site to see if it could make a positive contribution towards enhancing the setting of Theale in conjunction with any development on THE1.

Note: AONB's have now been renamed as National Landscapes

2. SUBMISSIONS

- 2.1 The following documents were submitted as part of the application and will be used for this review:
 - LVIA Landscape and Visual Impact Appraisal Land at Hoad Way, Theale, West Berkshire September 2023, Turley. Ref - FIRS300, including:
 - Appendix 1: Supporting Figures and photographs
 - Appendix 2: Landscape and Visual Impact Appraisal (LVIA) Methodology
 - Appendix 3: Visualisations prepared by Ocean CGI
 - Appendix 4: Winter Viewpoint Photography
 - Appendix 5: Landscape Advice Note: Evaluation of Landscape sensitivity and Capacity Assessment for Area THEA8: Land off Hoad Way, Theale
 - Design and Access Statement, date: September 2023 Rev C, SGP
 - Design and Access Statement – Landscape Strategy Turley, January 2024
 - Landscape Masterplan, date January 2024, Drawing No 01 Rev C, Turley
 - Soft landscaping Plan Drwg No 02 Rev D, Turley
 - Building Sections Drwg No 18-095-SGP-ZZ-ZZ-DR-A-131200 Rev P2, date 25/07/2023

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3. SITE DESCRIPTION AND CONTEXT

- 3.1 The site area as stated by the applicant is 5.4 hectares. The site is a relatively flat field of grassland with some areas of trees/shrubs towards the south western, southern and eastern boundary (full details in Arboricultural Assessment). The south west corner is also particularly wet. Towards the eastern end of the site overhead cables traverse with one pylon.
- 3.2 The site is located on the eastern edge of the historic village settlement of Theale, sandwiched between the embankment of the M4 to the north east, the A4/Bath Road on embankment to the south east and to the south west, Hoad Way. To the north west, the site boundary aligns the High Street. A small part of the south western area of the site is covered by the Theale High Street and Blossom Lane Conservation Area.
- 3.3 The boundaries of the site in detail are as follows:
- The southern boundary: The Highway boundary timber fence for the A4/Bath Road which is located at the foot of the embankment (outside the site). This embankment at the southern end contains tree planting, while further to the east towards the Junction 12 roundabout, the embankment is open and covered with grass, which allows open views down across the whole of the site to the eastern settlement edge of Theale.
 - The western boundary: This includes an irregular edge of scrub, brambles and some trees, which then loosely forms an intermittent site boundary hedgerow, with the ownership boundary marked with the Highway post and rail fence. The land then slightly rises up to Hoad Way – which forms the eastern gateway to Theale.
 - Northern boundary: The site boundary then aligns along the rear of the cluster of buildings at the junction with Hoad Way and the High Street, which is marked with a mix of hedgerows, outer building walls and a chain linked fence. A mature Lombardy Poplar is located and clearly visible on the corner. The northern boundary adjacent the High Street is defined by a hedgerow which has a composition of hawthorn, elder, hazel and some elm. Beyond this hedgerow is the High Street, where at the western end is aligned with dwellings and at the northern end open ground, which further extends as open ground across to the North Wessex Downs National Landscape (AONB).
 - Eastern boundary: This boundary partly aligns along the Highway boundary timber fence located at the base of the M4 embankment while excluding the boundary fence of the adjacent 18m high mast. The M4 embankment contains semi mature tree planting, which along with the fact that this section of the M4 is also in cutting, restricts all views of this highway from the west and the site.

4. LANDSCAPE CONTEXT AND CHARACTER

- 4.1 The LVIA considered the following documents and online information:
- National Character Area (NCA 115) Thames Valley
 - West Berkshire Landscape Character Assessment (2019)
 - Landscape Sensitivity and Capacity Assessment for potential employment sites within West Berkshire by Liz Allen EPLA (2022)
 - North Wessex Downs AONB: Integrated Landscape Character Assessment by LUC (2002)
 - West Berkshire Historic Landscape Characterisation (online)

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North Wessex Downs AONB Landscape Character Assessment 2002 and Management Plan 2019-2024

- 4.2 The northern corner of the site is set back from the boundary of the National Landscape (AONB) and LCA 8A Hermitage Wooded Commons by circa 20m. Although the site is not located within the National Landscape (AONB), it potentially would be regarded as within the setting of the National Landscape (AONB). The North Wessex Downs AONB provides the Position Statement 2012 on setting, which states:

The setting of the North Wessex Downs AONB can be explained as being the surroundings outside the AONB and although outside its boundary its extent is not fixed and may change over time. Elements of a setting may make a positive or negative contribution to the AONB, it may affect the ability to appreciate that significance or may be neutral. For the purposes of spatial planning, any development or change capable of affecting the significance of the AONB or people's experience of it can be considered as falling within its setting.

The surroundings of the North Wessex Downs AONB are also important to its landscape character and quality. Views out of the AONB and views towards or into it from surrounding areas can be very significant. Development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB. (My underlining)

- 4.3 As stated within the AONB Management Plan 2019-2024 with regard to landscape, key issues relevant to the site are as follows:

- *The potential for development beyond the AONB boundary to visually damage or undermine the scale and critical qualities of landscape character area*

- 4.4 One of the National Landscape (AONB) policies regarding development, state *...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.*

West Berkshire Landscape Character Assessment 2019 (WBLCA 2019)

- 4.5 Within the WBLCA 2019 the site is located within and towards the northern boundary of LCA ROI *Kennet Lower River with Open Water*. To help assess the suitability of proposals within different character areas, a user's guide is set out within Appendix 5 (WBLCA 2019). This table flags up what is important within each LCA, what is of value, what will exacerbate existing detractors and what is the overall landscape strategy for the character area. The LVIA did not include this as part of their assessment.

- 4.6 The LCA ROI *Kennet Lower River with Open Water* is described as a broad open valley of the River Kennet with floodplain habitats, with land use dominated by gravel pit lakes, industry and transport infrastructure. Settlement is described as sparse, excepting the large historic village of Theale. The historic village of Theale is also then further listed as one of the Valued Features and Qualities of this area (WBLCA 2019 page 82).

- 4.7 Furthermore, two listed detractors for LCA ROI, are as follows:

5) Pressure for new development: *The location of this area close to existing urban areas results in ongoing pressure for new residential development. This is particularly acute between Theale and Calcot.*

6) Prominent large-scale buildings *There are number of large structures within the character area, associated with industrial and commercial parks, out of town shopping centres and motorway services. These buildings are often visible above the tree line and are prominent on the skyline. Large*

structures can also detract from the setting of nearby historic buildings ... (WBLCA 2019 page 82-83).

4.8 The Landscape strategy for LCA ROI Kennet Lower River with Open Water include the following requirements:

2) Conserve and enhance hedgerows, woodland strips and remaining areas of pasture

Conserve features which are valued semi-natural habitats and which provide visual and audial screening of transport corridors. Planting may also act as a tool for reducing air pollution from the major transport infrastructure which crosses through the character area. Remaining areas of pasture land along the river corridor should be conserved, with pasture land restored/created where appropriate.

3) Respect the setting of historic features within the landscape *Ensure that any changes in land use or new development do not detract from the integrity of the heritage features within the landscape, including the historic farm buildings, areas of settlement designated as Conservation Areas and the Kennet and Avon Canal.*

4) Maintain distinction and sense of separation between the settlements of Theale and Calcot *The distinction between the separate settlements of Theale and Calcot and the role of the landscape as a setting to the character of those individual settlements should be respected.*

4.9 Landscape Strategy bullet point 3) is of importance as part of the site is set within the Theale High Street and Blossom Lane Conservation Area and the rest of the site would be regarded as part of the setting for the Conservation Area. Bullet point (4) is also of importance, as the site is set within the open landscape between Theale and Calcot.

4.10 **Conclusion:** The site as an area of open grassland on the edge of Theale forms a key component in defining the separation of Theale from Calcot. Additionally due to its close relationship to Theale its open character is also important to its separate identity and setting. This function was recognised within the WBLCA 2019 with a landscape strategy to protect it.

5. VIEWS OF THE SITE

5.1 The LVIA produced a Zone of Theoretical Visibility (Figure 4), identifying locations where potentially the site and proposed development (building at height of 13m) could be visible from. However, although the height of the building is 13m, it will be taller as it will be built on an elevated pad of around 1m to 1.5m. Therefore, the submitted ZTV is incorrect, as it hasn't taken this additional height into consideration. AS shown on Turley's Figure 4, the proposed development is visible from the open landscape to the north leading across to the National Landscape (AONB), contrasting with limited intervisibility to the south and from Arlington Business Park. From this ZTV, 16 photographic viewpoints were identified. My observations from these locations, with site visits undertaken in March 2024 and June 2023 are as follows:

5.2 Viewpoint IA: Views from the High Street and within the Conservation Area This view is east towards the site and includes the row of terraced houses (within the Conservation Area) against a backdrop of sky and the pylon with overhead cables. The site as a field of grassland is obscured by this intervening row of properties. To the right of the photo the junction with the High Street and Hoad Way is visible, where further to the right the change in landscape character from the built form of the settlement edge of Theale to open countryside can be appreciated. This photo illustrates an edge of settlement character with open land beyond.

5.3 Opposite side of High Street, from viewpoint IA illustrated as Viewpoint IB: Views from the southern side of the High Street, as compared to the northern side illustrate the more open rural edge of Theale marked by a mix of trees also within the Public Open Space to the left.

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- 5.4 Viewpoint 2A & 2B: Views from within the Conservation Area: This was taken further west along the High Street within the Conservation Area, where the pylon within the site and a treed horizon is visible. The view is of two storey historic buildings (some listed) with their roofline set against the clear open sky, which the undeveloped character of the site contributes to.
- 5.5 Viewpoint 3: View from public footpath THEA/10/1 on the pedestrian bridge over the M4 looking southwest (Located on the boundary of the National Landscape (AONB)) This view is taken from the elevated PRow located on the bridge which crosses the M4 Motorway. The view shows the site as an open area of grassland, enclosed along its southern boundary by the embankment with the Bath Road leading up to Junction 12. The pylon within the site is partly screened by intervening M4 Highway planting. A very small and largely indistinguishable part of a building within the Arlington Business Park is just visible beyond some evergreen trees (within the business park) and deciduous vegetation along the western and southern boundary of the site. The view then continues westwards across to the wooded horizon of the enclosing Kennet Valley. This view marks a gateway into Theale, where the site with the open land to the north and south of the High Street provides a continuous band/buffer of open land along the eastern edge of Theale.
- 5.6 Viewpoint 4: View from the northern edge of Theale looking south towards the site. The view is across the small park on the eastern edge of Theale, with trees screening the M4 to the left. The pylon within the site is visible above intervening vegetation. Again, the open character of the site contributes to the open settlement edge character of Theale.
- 5.7 Viewpoint 5: View from Bath Road at the junction to the M4 slip road looking southwest (see below): From this elevated junction there is an open view across the whole of the site visible in its entirety as an open field leading to the settlement edge of Theale, with the Grade I Listed Church of the Holy Trinity visible above the roof and tree line of Theale. This view also continues to the enclosing ridgeline further to the west set within the National Landscape (AONB).

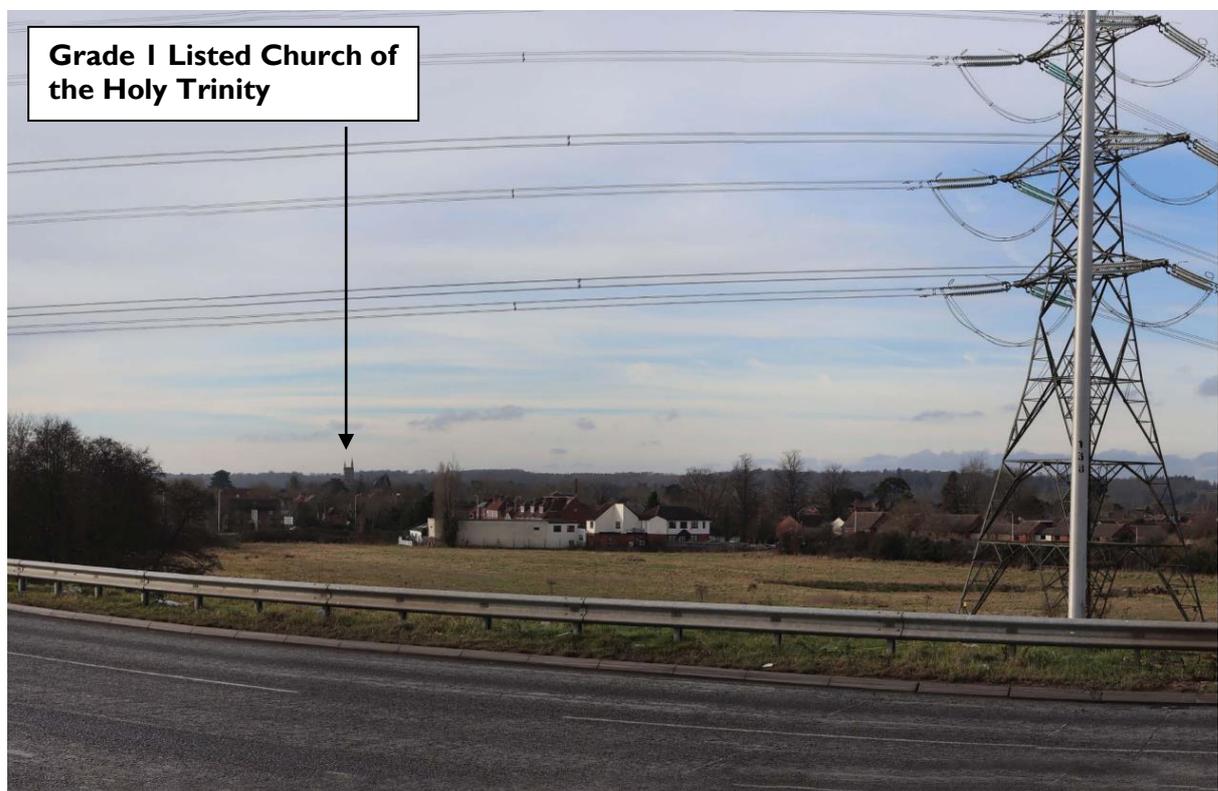


Figure LA1: Extract from Turley's LVIA of Viewpoint 5, illustrating how the Grade I Listed Church of the Holy Trinity is visible above the roof and tree line of Theale

- 5.8 Viewpoint 6: View (on the edge of the Conservation Area) located within a small Public Open Space. The view towards the site includes a small part of the northern boundary hedgerow, the

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pylon within the site; with the view then enclosed further to the east by the open grass embankment (Bath Road). There are no views of Arlington Business Park. Further to the south (right of photo) the site is screened by the terrace and temporary buildings associated with Kremer Motor repairs. From this location the open character of the site contributes to the setting of the Conservation Area.

- 5.9 Viewpoint 7: View from the southern side of the Hoad Way and Bath Road roundabout. Within the summer months views across to the site are screened by the highway tree and shrub planting on the embankment leading down to the site. Within the winter months, there will be filtered views through this deciduous vegetation across to the site, with the view continuing across to the Sulham Ridge within the National Landscape (AONB).
- 5.10 Viewpoint 8: View is across the urban settlement form of Theale. The only reference to the site's location is just shown with the upper parts of the pylon within the site. This is a typical view within Theale of small-scale buildings, forming an outline against the open sky. The wooded Sulham Ridge is just visible terminating the vista at the end of the High Street.
- 5.11 Viewpoints 9: Located on the southern side of Englefield, within the National Landscape (AONB). Viewpoint 9 is at a lower elevation to the site, where the view is predominantly rural with Theale largely screened by vegetation, except in a few locations where the Grade I Listed Church of the Holy Trinity is visible.
- 5.12 Viewpoint 10: View from within the adjacent housing development north of the High Street. As shown the upper parts of the pylon within the site are visible from certain locations. The open character of the site can be appreciated from this location and contributes to the open setting of Theale and its separation from Calcot.
- 5.13 High Street adjacent the site (Viewpoints 11, 13 & 16) As the High Street leaves Theale then terminates and continues as a PRow (Viewpoint 11). This historic route is well-used by pedestrians and cyclists which forms an important connection to the National landscape (AONB) and development east of the M4 and Calcot. From this section of the High Street, there are views over and through an unmanaged hedgerow into the site, visible as a field of grassland. The treed Bath Road embankment contains the view and also provides a summer screen to Arlington Business Park. To the north of the High Street there is a row of residential properties where from the upstairs windows the views will be over the hedgerow across the whole of the site.
- 5.14 Viewpoint 12: view from public footpath ref: SULM/13/1 to the south of Calcot dovecot (Wilders Folly) looking south. This view represents views from within the National Landscape (AONB). Due to intervening vegetation and topography, the site wasn't visible in its entirety. The most significant views will be from the PRow leading up to Wilder's Folly (Viewpoint 12), where there is a long wide elevated view across the Kennet Valley, where Theale is visible as a low-lying settlement with the Grade I Listed Church of the Holy Trinity prominent protruding above the roof line. The view towards the site is partly obscured by intervening vegetation, although the pylon within the site is just about distinguishable against the valley side, as a small part of a wider view.
- 5.15 Viewpoint 14: View from Hoad Way looking northeast across the site: Hoad Way provides the eastern approach road into Theale. From this highway the site as shown within the summer views is visible as an open field of grassland, enclosed by trees on the M4 embankment, the Bath Road embankment and the wooded Sulham Ridge within the National Landscape (AONB) on the horizon.
- 5.16 Viewpoint 15: At the roundabout with Hoad Way and the Bath Road looking north: Within the winter months there are filtered views of the site as an open grass field, with the view continuing across to the Sulham Ridge within the National Landscape (AONB). From this location the village of Theale can be appreciated as a separate settlement, with the site contributing to its open rural

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setting. Within the summer months the highway trees on the embankment only allow very filtered views of the site.

- 5.17 The site is visible from the immediate surroundings in nearly its entirety (except from the M4). A number of these views then extend across to the National Landscape (AONB), which also contributes to the setting of Theale. The site is also visible from within the Conservation Area, where the open character of the site contributes to the clear skyline and setting for the historic buildings. The open character of the site also permits views from the M4 Junction 12 towards the Grade I Listed Church of the Holy Trinity, a key historic landmark within Theale.
- 5.18 Theale is a visibly separate settlement from Calcot. It is also visually separate from the Arlington Business Park to the south by the wide elevated A4/Bath Road located on a treed embankment. The site's open character is shown to contribute to this separation as well as providing an open setting and gateway to the village of Theale. The surrounding embankments although artificial visually further contributes as areas of grass and trees/shrubs forming part of Theale's semi-rural setting.

6. KEY LANDSCAPE ISSUES

- Impact on the North Wessex Downs National Landscape (AONB)
- Impact on the Theale High Street and Blossom Lane Conservation Area
- Impact on setting and gateway into Theale village and semi-rural character of Theale village
- Impact on the perceived physical separation of Theale from Calcot and their separate identities
- Impact on landscape character of the area

7. RELEVANT POLICY

National: NPPF (December 2023)	Section 2 para 8 (c), Section 12 in particular paras 131, 135, Section 15 para 180 and 182
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West Berkshire Core Strategy 2006-2026	CS14, CS19 and ADPP5
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8. ASSESSMENT OF THE SCHEME

Description of proposals

- 8.1 In summary, the proposed development as set out by the applicant consists of the following components:
- Site Area 5.4 hectares, with the area west of the overhead cables and pylon as the development zone
 - One point of vehicular access off Hoad Way
 - 2 No large-scale buildings with an overall footprints and adjacent parking as follows:
 - Unit 1&2: Footprint 54,600m x 162,225 = 8,857.485 sq. metres (0.8857485 hectares), and ridge height: 13m
 - 112 car parking spaces
 - 16 trailer spaces
 - 8 Disability Spaces
 - 10 Motorcycle spaces
 - Internal roads for access with pedestrian pavement

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- Tarmacadam service yard
- Substation adjacent access off Hoad Way
- Internal new path across site from Hoad Way to the High Street

8.2 The landscape scheme is described as follows:

- All areas of trees as identified within the tree survey - G3 (B) and the area of G2 (B)) and part of the (G4 (B) will be felled and removed. The letter B identifies the trees as Category B: which are described as within the Arboricultural Assessment as *...Those trees of moderate quality and value with an estimated remaining life expectancy of at least 20 years.*
- The hedgerow adjacent the High Street on the northern edge of the site will be retained and with a circa 35m wide building free band which will contain an attenuation pond at the western end and a native tree and shrub mix planting at the eastern end. This band will also be planted with a few feathered and extra heavy standard trees
- Hoad Way: Planting proposed at junction includes extra heavy standards trees
- Within the south east and north east corner of the site: Mix of shrub and tree planting
- Western end of site between the proposed building and Hoad Way an area of mixed native shrubs and trees will be planted on a low mound and extra heavy standard and standard trees in open grass
- Car park area: Clipped native hedgerows, areas of ornamental shrub planting and ground cover
- Site beyond the overhead cables is proposed as retained semi natural grassland
- Proposed public pathway from Hoad Way across to the High Street

NOTE: The applicant has included trees/shrubs off site, as retained. These areas are not within applicant's ownership and therefore have no control over whether if they are retained or not.

8.3 No information was provided for any proposed perimeter security fence or internal fences if they are required

9.0 DIRECT IMPACTS AND IMPACTS ON LANDSCAPE CHARACTER OF THE SITE

9.1 The proposals will result in the direct loss of an area of grassland and three areas of trees as identified on the tree survey as G2, G3 and G5 and part of G4 which will be replaced with circa 3 hectares of buildings and hardstandings used for vehicle access and parking, with some additional areas of grassland, shrub, woodland and tree planting. This will result in a direct adverse landscape effect on the landscape features of the site. An assessment on the landscape features was not clearly provided within the LVIA.

9.2 As I have detailed above, the proposal will result in a change in landscape features of the site which would also result in a direct adverse effect on the landscape character of the site. The LVIA did provide an assessment on the effect of the proposals on the landscape character of the site (para 5.34-5.37), where the LVIA stated (para 5.35) *...The scale of the built form would contrast with surrounding residential areas, which I agree with.* The LVIA then stated the proposals would result in a Medium-High magnitude of change, I disagree with this assessment the magnitude of change on the character of the site will be higher; as stated within the LVIA's own methodology the proposed development would be assessed as High. Therefore, even combining a Medium sensitivity with a High magnitude of change would result in a Moderate to Major adverse effect, not as stated Moderate adverse landscape effect.

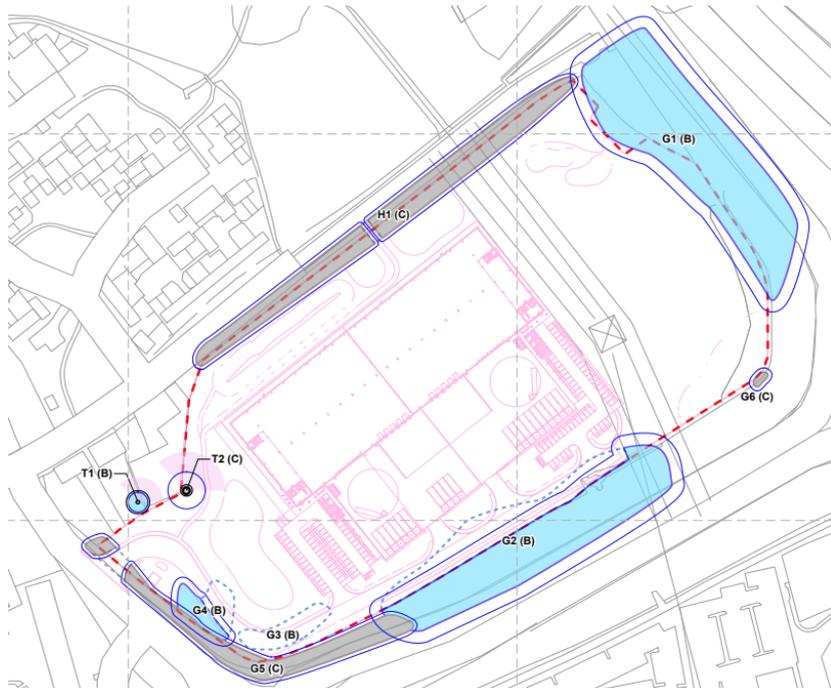
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Figure LA2: An extract from the Tree Retention Plan by Middlemarch Sept 23, showing the loss of trees/woodland as a result of the development proposals with the remaining areas of woodland, which are shown to be retained located off site and not within their control

- 9.3 I further disagree with the LVIA assessment on landscape character. By using Turley's methodology matrix a Medium sensitivity combined with a Medium-High sensitivity (although that level doesn't exist in their LVIA tables) the LVIA has downgraded the effect to Moderate, but following the combined criteria would result in two thirds Moderate and one third Major? This illustrates how complex it becomes using a grade in-between as the LVIA has reported. At Year 15, the LVIA has assessed the development proposal on the landscape character as again Moderate; I agree there would be very little change in the landscape character of the site after 15 years due to the size, scale and expanse of the proposals. However, the adverse effect would still be higher resulting in a Major adverse effect, as by the wording within the LVIA's own methodology which states...*where the proposed scheme is likely to cause a considerable change from the baseline conditions*
- 9.4 The proposals will result in a significant adverse effect on the site's landscape character which due to its size and scale cannot be successfully mitigated. As illustrated within the submitted photomontages, in particular Viewpoint 5 and Viewpoint 14.

Indirect Impacts on the wider landscape

- 9.5 The site is semi-open along its southern, western and northern edge to the surrounding area and wider landscape. The undeveloped character of the site therefore contributes to the semi-rural setting for the village of Theale and its Conservation Area. The site also forms part of the open land which separates the village of Theale from Calcot located further to the east.
- 9.6 The LVIA undertook an assessment of the development proposals against the LCA: ROI: *Kennet Lower River Valley*, but did not follow the recommended approach as set out within the WBLCA 2019 Appendix 5. This is a user's guide, which follows a step-by-step approach to help assess the suitability of proposals within different character areas. This table flags up what is important within each LCA, what is of value, what will exacerbate detractors and what is the overall landscape strategy for the character area. This approach allows a clear and transparent assessment, concentrating on issues of importance. I have undertaken this assessment on the suitability of the proposals for the site as follows:

TABLE LA1: Assessment of the proposed site to accommodate development

Landscape Character Area: (LCA) LCA: RO: <i>Kennet Lower River Valley</i>	
Landscape Strategy	How will the proposal contribute to the Landscape Strategy?
2) Conserve and enhance hedgerows, woodland strips and remaining areas of pasture	The development will result in a loss of an area of previous pasture and small areas of regenerating trees around periphery. Non-compliant
3) Respect the setting of historic features within the landscape: <i>Ensure that any changes in land use or new development do not detract from the integrity of the heritage features within the landscape, including the historic farm buildings, areas of settlement designated as Conservation Areas</i>	The site is located within the Conservation Area and will be visible from areas further within the Conservation Area. The proposed development will have an adverse visual effect from locations within the Conservation Area which will have an adverse effect on the rural setting of the historic settlement of Theale The open field contributes to the setting of the Grade I Listed Church of the Holy Trinity, which is prominent on the Theale skyline. This will be replaced with large scale buildings, service yard and car parking (Viewpoint 5 Photomontage) Non-compliant
4) Maintain distinction and sense of separation between the settlements of Theale and Calcot <i>The distinction between the separate settlements of Theale and Calcot and the role of the landscape as a setting to the character of those individual settlements should be respected.</i>	The proposed development will reduce the open area between Theale and Calcot which will further erode their sense of separation The proposed development will be visible within the setting of Theale which will erode its semi-rural village settlement character Non-compliant
Key Characteristics of LCA R01	Will any of the key characteristics be affected by the proposals? if so which ones and how?
1) Broad, open valley of the River Kennet, underlain by chalk geology with gravel and sand deposits	Yes, the open field of the site represents an area of remaining pasture as associated with the once small agricultural village of Theale
2) Land use dominated by gravel pit lakes, industry and transport infrastructure	The landscape of this LCA is characterised by these land uses. However, in views, the site is not dominated and is largely separate from them and forms as illustrated within the photo viewpoints a relationship with the historic settlement of Theale
4) A modern landscape dominated by transport corridors and gravel extraction with surviving small scale heritage features: <i>Past intensive industrial activity in this area has resulted in the loss of much of the time-depth within the landscape. A number of heritage features remain, including Listed farmhouses and locks and bridges along the Kennet and Avon Canal. There are three conservation areas located in the core of Theale and which contain numerous listed buildings including the distinctive Grade I Listed Church of the Holy Trinity.</i>	Yes, the proposed development will have an adverse visual effect on areas within the Conservation Area and its setting. The proposed development will also result in an adverse effect on the setting of the Grade I Listed Church of the Holy Trinity, which is prominent on the Theale skyline. The open character of the site provides a rural setting for Theale allowing it be perceived as a separate historic settlement where the church contributes to its identity
5) Settlement in the area is sparse, excepting the large historic village of Theale: <i>The character area is influenced by the dense urban development within Reading to the north. Within the character area itself settlement is sparse; development consists of isolated farmsteads, thatched cottages, mill buildings and recreational centres. The largest settlement in the character area is the historic village of Theale which has expanded across the</i>	Yes, presently there is no intervisibility with Theale and the dense urban development of Calcot/Reading and the M4. This allows Theale to retain its separate historic settlement, semi-rural, small-scale residential character. The proposed development of non-characteristic large scale logistic buildings, service yard will erode the identified small scale residential character of Theale

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valley slopes. Other development includes large structures associated with industry and buildings within Reading motorway services and commercial development at Arlington Business Park.	
6) Transport links are a dominant feature, particularly the M4, railway and canal	Within the vicinity of Theale, the M4 in plan could be perceived as a dominant feature, but in reality, and from views on the eastern side of Theale it is well screened within a cutting and mature highway tree planting which then further links with the wider woodland landscape within the National Landscape (AONB)
7) Destination for formal and informal recreation activity	Yes, the proposed development is in a very visible location which will erode the visitor experience to Theale.
9) Tranquillity is limited by the motorway and nearby urban development	The site is affected by traffic noise; however, traffic is largely screened from views from locations on the east of Theale. When the cause of noise can't be seen, this reduces the impact of noise on the receiver
Key Valued Features and Qualities of LCA R01	Will the proposals adversely affect any of the valued features and qualities?
3) The historic village of Theale: The historic parts of Theale are designated as Conservation Areas and contain a number of listed buildings including the Grade I Listed Church of the Holy Trinity.	Yes, as follows: <ul style="list-style-type: none"> • Adverse visual effect on areas within the Conservation Area and its setting • Adverse effect on the setting of the Grade I Listed Church of the Holy Trinity • Adverse effect on overall setting and identity of Theale
Detractors	Do the proposals further exacerbate identified detractors?
4) Past and present impacts of industrial use Past mineral extraction has created an industrialised character in some parts of the landscape. This has been further exacerbated in the urban fringe areas of east Newbury, Thatcham and Theale by the spread of commercial and industrial land use onto the valley floor.	Yes, increase of commercial and industrial development on the valley floor
5) Pressure for new development: The location of this area close to existing urban areas results in ongoing pressure for new residential development. This is particularly acute between Theale and Calcot.	Yes, the development proposals are within a key area which provides a setting and separation of the historic settlement of Theale from Calcot
7) Development of large infrastructure such as solar farms and waste management facilities There are a number of solar farms within the character area which can be visually detracting. There is also an Integrated Waste Management Facility at Padworth Sidings. Overhead power lines run the length of the valley and are prominent features on the skyline.	No, the site contains a pylon and overhead power lines which partly detract from its overall visual quality

9.7 The assessment process within Table LAI asked a series of questions. If the answer to either of the last two questions is 'yes', the developer should then consider if the proposal can be altered in any way to ensure it contributes positively to the landscape strategy. As shown, the proposals have not been able to contribute positively. The LVIA recognises that (para 5.16) *the scale and type of proposed development-built form would contrast with the residential context to the north and west of the site.* Therefore, I disagree with the LVIA assessment on the LCA: *Kennet Lower River Valley.* the effect on the landscape character would be considerably higher adverse and important. Furthermore, the proposals will not conserve and enhance the landscape character of LCA ROI, but exacerbate an identified detractor by introducing development which will erode the separate identities of Theale from Calcot.

North Wessex Downs National Landscape (AONB)

- 9.8 The site lies adjacent and within the setting of the National Landscape (AONB). I agree with the LVIA which states (Para 5.26) *...It would introduce logistics development into the setting of the AONB.* As shown within Turley's visual assessment there are views (in particular Viewpoint 14) from Hoad Way across the site to the National Landscape (AONB). The site as shown below is Turley's photograph of the existing view from viewpoint 14, however it has been taken with a 24mm lens. A 24mm lens although provides a more panoramic view, will distort the view with an increased depth of field, pushing the horizon further into the background and diminishing the site's relationship with the National Landscape. The photo below shows the site as an open field of grass enclosed by the wooded Sulham Ridge, within the National Landscape (AONB) beyond.
- 9.9 As shown below within the photomontages (Figure LA2 & Figure LA3), the proposed development will not conserve and enhance the National Landscape (AONB) as it will obscure and block views across to the National Landscape (AONB) from the eastern edge of Theale.
- 9.10 I disagree that the proposed development would result in a negligible effect. As the National Landscape (AONB) would be graded at a high sensitivity and as per the National Landscape (AONB) setting statement... *development which would have a significant visual impact on views in or out of the AONB.* As shown on Turley's photomontage the proposed development will block this view across to the National Landscape (AONB), which will result in an adverse effect which will be permanent
- 9.11 I also disagree that (LVIA para 5.26) *...The elevation treatment and roof profile has been designed to reduce the prominence of the Proposed Development when seen from the wider area.* The building due to its massing, scale and positioning will not be able to reduce the adverse effect on the National Landscape (AONB), as the loss of the existing views will be permanently blocked.



Figure LA1: Turley's existing photo was taken with a 24mm lens, which shows an increased depth of field, pushing the wooded horizon within the National Landscape (AONB) further into the distance. An existing photo should have been included within the LVIA and taken with a 50mm lens, which represents as close as possible an accurate view.

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Figure LA2: Turley's photomontage is also inaccurate as it is based on a photo taken with a 24mm, however it still illustrates how the proposed development will block the views across to the Sulham Ridge (within the National Landscape) and break the skyline



Figure LA3: This photomontage is based on an image taken with a 50mm lens; however, I question the accuracy of the building. As shown the proposed development will block views across to the National Landscape and intrude into the skyline

Conservation Area

- 9.12 As illustrated within the *Heritage Statement September 2023*, the site is shown on the Tilehurst Parish Tithe map (1843) as an open field on the edge of Theale. While Theale has since expanded

beyond its historic core to the north, west and south, this original settlement edge of Theale and its relationship with the site as an open field is still intact. The site is visible from the Conservation Area, at the entrance into Theale from Hoad Way and from eastern areas within the Conservation Area, where the undeveloped character of the site contributes to the original village rural setting of Theale. The LVIA provided an assessment of the proposals on the Conservation Area stating that the proposals will result in a minor/moderate adverse effect. I disagree with this assessment, as within the LVIA which states para 5.32... *this would introduce built form and activity at odds with the character and scale of the conservation (Area)*. Based on this statement the magnitude of change will be at least medium, resulting in at least a Moderate to Major adverse landscape effect. Which after 15 years, as shown on the photomontages from the views from the public open space within the Conservation Area - Viewpoint 13 the proposed building will still be visible, at odds with the character and scale, particularly within the leafless winter months.

10 VISUAL IMPACTS

10.1 The LVIA, produced a visual survey with 17 photographic viewpoints, where the visual assessment was then completed from. However, the reporting was not clear and subsequently not transparent as required by the guidance within the GLVIA3 as follow:

- The visual assessment grouped the 17 viewpoint locations together to form 7 groups i.e. Group 1 included Viewpoints 1A, 1B, 2A, 2B, 6, & 8. Grouping them together downplayed the more sensitive locations
- Combining different visual receptors together which have different sensitivities i.e. pedestrian's, vehicle users, and people within the public open space, was also undertaken. This also downplayed the more sensitive receptors and avoided clearly stating the impact of the development proposals on them

10.2 Turley's approach, then produced a range of magnitude of change, as all the views were slightly different. This combined with a range of visual receptors, produced a final assessment with a range of visual effect, which was often very broad i.e. Moderate – Minor to negligible. By undertaking a visual assessment this way, has resulted in the visual effect on the very sensitive viewpoints to be diluted and also not clearly stated.

10.3 In detail, as shown from Viewpoint 6, set within a Small Public Open Space in the Conservation Area an existing view looking out towards the site, will be replaced with large scale logistic building, which will dwarf the adjacent residential settlement edge character of Theale. The change in view by applying the LVIA's own methodology will be high, due to the fact that the magnitude will result in *an addition of major new elements which would be dominant features and changes would substantially alter the character of the view*. Combined with a sensitive receptor (pedestrian within a public open space) will result in at least a major/moderate adverse effect which will be important and significant, not as assessed within the LVIA as moderate/minor.

10.4 Summary comments on the impact of the proposed development from some of the key viewpoints are as follows:

- The proposed development due to its height and scale will dominate views on the surrounding visual receptors: roads, Public Rights of Way, a Public Open Space and residential homes, which will have a major adverse visual effect, which due to the scale of the proposed development cannot mitigated.
- The proposed development will be visible from the Conservation Area, replacing an existing largely uninterrupted skyline for this historic area with large industrial buildings, which due to their scale cannot be mitigated (Viewpoint 1, 2 and 6)

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- The proposed development will replace an open field and gateway into Theale from the east with large scale buildings (Viewpoint 5). The open character and setting this field provides cannot be mitigated.
- Hoad Way adjacent the site: Hoad Way provides an approach road to Theale, where the site is visible as an open field of grassland, enclosed by trees to the east. The proposal will result in a high magnitude of change resulting in a Moderate/Major adverse visual effect for the users of Hoad Way as per the LVIA's own methodology. The proposed development will also block views from Hoad Way across to the wooded Sulham Ridge set within the National Landscape (AONB), resulting in an adverse effect on the setting of the National Landscape (AONB).

10.5 Although the LVIA has stated that the palette of materials and the design of the facades will use neutral colours which will soften the buildings when viewed from the surrounding landscape. The buildings will still be very prominent within views due to the proximity of the site at the entrance to Theale, as illustrated in the LVIA's own photomontages.

11 ASSESSMENT OF THE LVIA

- 11.1 The Landscape Institute as set out within TGN1/20: Reviewing Landscape and Visual Impacts Assessments (LVIAs) and Landscape and Visual appraisals (LVIA) states when undertaking a review, there are three main components, in respect of the completeness, competency and reliability of the LVIA/LVA. They are as follows:
1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
 2. Checking the baseline, content and findings of the assessment;
 3. Checking the presentation of the assessment findings.
1. *Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;*
- 11.2 Although it is accepted landscape professionals will produce their own methodology, it still must be clear, adhere to the GLVIA 3rd Guidance and then be followed. The submitted methodology because it lacked a number of key tables to explain the process, therefore lacked transparency on how certain assessment levels were obtained. For example, No table was provided for combined value and susceptibility: it is therefore unclear how the value of a receptor is combined with the receptor's susceptibility which would give a score for its sensitivity
- 11.3 Agreeing photo viewpoints: This was undertaken with myself (June 2023) with a site visit with Turley's and agreement to the viewpoints
- 11.4 Subjective wording used in assessing the value of landscape receptors: The methodology used an 'ordinary' level to describe value. This is not an accepted or recognised level for an LVIA assessment; it is far too subjective and will therefore be fully down to the subjective opinion of the assessor
- 11.5 Noncompliance with the NPPF with value of landscape receptors: As Turley's requirement for the highest valued level of landscape only includes World Heritage Sites, National Landscapes (AONB) will therefore will only score the second highest level. As set out within the NPPF (December 2023) para 182...*great weight should be given to conserving and enhancing landscape and scenic beauty in national parks, the broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues*. Therefore, Turley's landscape value criteria also does not comply with the NPPF

- 11.6 Value criteria: Also, within the value criteria, it included the requirement for the landscape character areas to be locally designated. West Berkshire do not designate local landscape, but use as set out within their WBLCA 2019 a landscape character led approach, whereby valued features and qualities are identified within each landscape character area.
- 11.7 Magnitude of landscape effects: Under magnitude of effect – Low and Very Low, the description states...*small scale changes to ‘common’ characteristics*. In landscape terms what are common characteristics? Often what is common gives an area its recognised valued character. This approach is misguided
- 11.8 Not enough levels within tables: As shown within the assessment, often the sensitivity of a receptor was reported between levels, for example within Turley’s Table 5.1, the sensitivity for *LCA ROI: Kennet Lower River with Open Water* is stated as Medium-Low and the Theale High Street/Blossom Lane Conservation Area is assessed as Medium – High. Both levels are not within tables and not explained within the methodology. It then becomes further complicated combining a mid-level sensitivity with the magnitude of change, for example in the case of the Conservation Area, which the LVIA reported the magnitude change as Low which as stated by Turley resulted in a Moderate - Minor adverse effect, there is also no description what this clearly means.
- 11.9 Comprehensive identification of receptors: Turley’s listed landscape features: *Land use, urban structure and built form, Vegetation, public realm and open space and accessibility and movement*. are all not landscape features. The area of grassland within the site should have been identified as the main landscape feature; this was omitted.
- 11.10 Combining visual receptors: Turley combined visual receptors with different values, which resulted in a range of sensitivities for each collective viewpoint. This over complicated the assessment and also downplayed the more sensitive receptor.
- 11.11 Missing out levels within the scale of effect table: Following the rational of Turley’s scale of effects table which is shown as Major, Moderate to Major, Moderate, wouldn’t then the next level be Moderate to Minor? not as shown Minor? Omitting Moderate to Minor effect, results in a distortion on a higher number of negligible and minor effects development, as shown below:

		Sensitivity			
		High	Medium	Low	Very Low
Magnitude of Change	High	Major	Moderate to Major	Moderate	Minor
	Medium	Moderate to Major	Moderate	Minor	Minor to Negligible
	Low	Moderate	Minor	Minor to Negligible	Negligible
	Very Low	Minor	Minor to Negligible	Negligible	Negligible
	Negligible/None	Negligible	Negligible	Negligible	Negligible

		Sensitivity			
		High	Medium	Low	Very Low
Magnitude of Change	High	Major	Moderate to Major	Moderate	Moderate to Minor
	Medium	Major to moderate	Moderate	Moderate to Minor	Minor
	Low	Moderate	Moderate to Minor	Minor	Minor to Negligible
	Very Low	Moderate to Minor	Minor	Minor to Negligible	Negligible
	Negligible/none	Minor	Minor to Negligible	Negligible	Negligible

Figure LA3: The top table is from Turley’s Methodology, which has missed out a layer which I have highlighted in yellow in my table below.

2. *Checking the baseline, content and findings of the assessment;*

- 11.12 For a thorough, complete, clear and transparent landscape and visual assessment to be provided, the baseline should be clearly identified and set out with full reference to relevant adopted documents, photos, plans illustrations etc. Turley did not comply with this, with a number of examples as follows:
- 11.13 Context: An aerial photograph of the site's context would have been useful, rather than relying on plans. The plans always included the Arlington Business Park to the south although there is limited intervisibility with the site and the park. As stated within the GLVIA3 (para 5.2, page 70) *the study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. This will usually be based on the extent of Landscape Character Areas likely to be significantly affected either directly or indirectly. However, it maybe also be based on the extent of the area from which the development is potentially visible, defined as the Zone of Theoretical Visibility, or a combination of the two.* Based on Turley's ZTV (Figure 4), the context of the site should have included more of the area to the north of the site.
- 11.14 Figure 4 – Zone of Theoretical visibility is not accurate. The ZTV was only undertaken for the 13m height of the buildings, whereas within the landscape, once built on the required elevated plinth of 1/1.5m high, the building will therefore be 14/14.5m high. Therefore, the ZTV is incorrect and misleading on the proposed visibility of the development. Additionally, some viewpoints where the LVIA have shown proposed development will be visible, the ZTV is not clearly showing this. For example, on ZTV: Figure 4, from Viewpoints 2A and 2B there will be views of the proposed development, however this area is not shown clearly as an area with potential views of the proposals.
- 11.15 The LVIA did not clearly provide an assessment against the WBCLCA (2019) and whether the development proposals contribute to the landscape strategy in particular on maintaining the distinction and sense of separation between Theale and Calcot.
- 11.16 The susceptibility of the site: Turley based this on the proximity of the site to other employment uses and road infrastructure. As shown the site has insignificant visibility with Arlington Business Park. The site also has no visibility with the M4. Susceptibility of site is not based on proximity to other land uses especially when the two are not visually connected. The site is located within the setting of Theale, which the LVIA describes as stated (para 5.16) *the scale and type of proposed development-built form would contrast with the residential context to the north and west of the site.* As there is no intervisibility with the M4 to the east, no significant visibility with Arlington Business Park to the south, the main intervisibility is with the historic village of Theale, which should have been included.
- 11.17 Landscape character areas - Magnitude of change: LCA ROI | Kennet Lower River with Open Water Para 5.24 – Turley based the magnitude of change of the proposed development on LCA ROI, measured as a small fraction of the whole area of the LCA. This is not how the magnitude of change would be assessed, as all sites would be a small part of a landscape character area.
- 11.18 Landscape Strategy: LCA ROI: Kennet Lower River with Open Water: Turley addressed this within para 5.23, which stated...*The proposed development would result in a reduction in grassland and part of the open setting to Theale would be developed.* And also...*the proposed development would reduce the width of the gap between Theale and Calcot.* Although Turley then goes onto state, a reduced gap would remain, however this is still a reduction which would not as shown would retain the open setting to Theale. Additionally, as the remaining area of grassland would not retain the setting of Theal, it would be under pressure for future development.
- 11.19 Visual receptors - Magnitude of change: Turley did not provide a clear assessment with a vast range in the magnitude of change repeatedly used, described, for example for viewpoints for pedestrians on the High Street and public footpath, the magnitude of change the LVIA reports will

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range from Medium - high to low. Combining different viewpoint locations, with very different views together, Turley has down played the more sensitive location

- 11.20 No Winter visual assessment: As the surrounding tree planting is mainly deciduous, within the winter months the views would be far more open as the LVIA has shown on their winter photos. A winter visual assessment was not included within the visual assessment.
- 11.21 Using distorted photos within the LVIA: Within Chapter 4 of the LVIA, a description with a selection of photos was provided. For consistency and a more accurate views, photos should be taken with a full frame 50mm lens camera, to show the least amount of distortion, lengthening, and extending of the depth of field. Although inserting photos into a document can be of use to illustrate a point, however a number of these photos were not taken with a 50mm lens and are misleading, for example Figure 4.1 (page 32), 4.3 (page 4.3), RV5 (page 43) to list a few.

Existing views and Photomontages:

- 11.22 The LVIA as requested by West Berkshire included photomontages from a series of viewpoints. The Landscape Institutes Technical Guidance Note 06/19 stated within para 1.22 *it is critical that these visualisations are accurate, objective and unbiased. They should allow competent authorities to understand the likely effects of the proposals on the character of an area and on views from specific viewpoints.*
- 11.23 As stated within the TGN 06/19, the type of visualisations required would be a level Type 3-4, as the purpose would fall into categories A & B as the proposed development could be described as contrary to policy or likely to be contentious (TGN 06/19, Page 9). To summarise, the photos need to be clear, taken with a full frame camera and with a 50-mm lens, to give as close as possible the existing view and a realistic visualisation of the proposed development. The LVIA used for a number of viewpoints a 24mm lens for existing photos and photomontages and then a 35mm lens for the winter photos. The use of 24mm and 35mm lens would distort the view within the photos, which would be considered misleading to how the proposed development would actually look within the landscape. The Table sets out which viewpoints were affected.

Viewpoint	Focal length as stated mm	Existing View	Existing Winter view	Year 1 summer Photomontage	Year 15 summer Photomontage
Viewpoint 1A	50	50 (not stated)		50 (not stated)	50 (not stated)
Viewpoint 1b	50	50 (not stated)	35	50 (not stated)	50 (not stated)
Viewpoint 2a	50	50 (not stated)	35	50(not stated)	50(not stated)
Viewpoint 2b	50	50 (not stated)	-	50(not stated)	50(not stated)
Viewpoint 3	50	50 (not stated)	35	50 (not stated)	50 (not stated)
Viewpoint 4	50	50 (not stated)	35	50 (not stated)	
Viewpoint 5	24	24	35	24 & 50	24 & 50
Viewpoint 6	50	50 (not stated)	35	50 (not stated)	24 & 50
Viewpoint 7	50	24	35	24 & 50	24 & 50
Viewpoint 8	50	50		50	
Viewpoint 9	50	50	35	50	
Viewpoint 10	24	24	35	24 & 50	24
Viewpoint 11	24	24	35	24 & 50	
Viewpoint 12	50	50 (not stated)	35	50 (not stated)	
Viewpoint 13	50	50 (not stated)	no	50 (not stated)	50 (not stated)
Viewpoint 14	24	24	35	24 & 50	24 & 50
Viewpoint 15	24	24	35	24	wireframe only 50
Viewpoint 16	24	24	-	24 & 50	24 & 50
Viewpoint 17	24	50 (not stated)	-	24 & 50 (not stated)	50

Figure LA4: Table with viewpoint photo lens information. The use of 24mm and 35mm lens for photos, provides a distortion which is not acceptable to show the existing view and as a base for photomontages. The use of 24mm lens was also used on the more sensitive locations, including Viewpoint 5, 14, 15 & 16

- 11.24 Accuracy of photomontages: The LVIA states the height of the proposed buildings at 13m, however the buildings will be located on made up ground with an increased height of 1/1.5m. There is no evidence within the photomontages that this made-up ground is included, with the buildings within the photomontages incorrectly set on the existing ground levels.
- 11.25 No winter photomontages: All photos were taken at the optimum time for leaf coverage (July) which were then also used for the photomontages. For a balanced approach, photomontages should also be included for winter views, when the landscape would be far more open as the worst-case scenario should also be shown.
- 11.25 No information was provided for tree growth. The trees shown within the photomontages at Year 15 seem more mature than 15 years probably 30 years plus. Therefore, the photomontages are misleading.
- 11.26 Planting on the embankment: Viewpoint 5: The intervening embankment is within the Highway ownership. Trees will therefore not be planted on this sloping embankment at this location, but at the bottom of the embankment, which is circa 9m below the height of the view. Therefore, the photomontage is inaccurate as the trees are shown at a height which could only be achieved by planting on the embankment.
- 11.27 **Conclusion:** West Berkshire required an assessment of the submitted LVIA which formed part of the planning application NO24/00145/FULMAJ. A review was undertaken following guidance as set out within the GLVIA3, Landscape Institutes Technical Guidance Notes and visits to the site area. In summary the methodology was complex, lacked transparency and omitted important criteria tables. The assessment also didn't clearly identify and separate visual receptors and landscape receptors, and did not follow the Technical Guidance Note for the taking and production of existing photos and visualisations. Overall, the submitted LVIA was not compliant with the GLVIA3.

12.0 CONCLUSION

- 12.1 The site is set on the edge of the historic village of Theale partly adjacent and within the Theale High Street and Blossom Lane Conservation Area. As stated within the NPPF para 8 (c)... *an environmental objective – to protect and enhance our natural, built and historic environment.* Presently due to the size, scale and proximity to Theale, the proposals do not achieve this objective.
- 12.2 NPPF 2023(December) para 135 considers that developments ...(b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping* ...(c) *are sympathetic to local character and history, including the surrounding environment and landscape setting and...* (d) *establish or maintain a strong sense of place.* As shown the proposed layout, scale and massing of the buildings are totally unsuitable in this very visible and sensitive location. Although a comprehensive mitigation strategy was provided, this will do little in mitigating the proposals on the listed sensitive visual and landscape receptors.
- 12.3 NPPF 2023 (December) para 136 references the importance of trees and how they can contribute to the character of an area. Para 131 also states that... *existing trees are retained where possible.* All the trees as shown, except for a narrow band on the eastern boundary will be removed.
- 12.4 The Government's National Design Guide was published in January 2021 and addresses the question of how we recognise well designed places, by outlining and illustrating the priorities for well-designed places in the form of ten characteristics. The first characteristic covers 'context', which states that *...well designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary.* The second characteristic listed within the NDG is 'identity', which states (amongst other aspects) *...well designed places, buildings and spaces*

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have a character that suits the context, its history. As shown the proposed scheme bears no relation to its historic context, within an area of open land which provides Theale with its setting and a separate identity from Calcot as further outlined within the WBLCA 2019.

- 12.5 NPPF 2023 (December) para 180 states that *...planning decision should contribute to enhance the natural and local environment by a) protecting and enhancing valued landscapes.* As detailed the proposed development do not contribute or enhance the local environment or the National Landscape.
- 12.6 NPPF 2023 (December) para 182 states... *great weight should be given to conserving and enhancing landscape and scenic beauty in... Areas of Outstanding Natural Beauty...while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.* As also stated within WBCS (2006-2026) Policy ADPP5 *... development will conserve and enhance the local distinctiveness, sense of place and setting of the AONB.* As shown the proposed development will intrude into the rural setting of the National Landscape (AONB) and also the proposed development will have an adverse effect on views across to the National Landscape (AONB). Both of these aspects will not be compliant with this Local and National Policy.
- 12.7 As stated within Policy CS 14: *New development must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area.* Policy CS19 considers the conservation and enhancement of the local landscape character areas of West Berkshire. As shown the proposed buildings will have a significant adverse landscape effect on the landscape quality of this area, an adverse effect on the Conservation Area of Theale, an adverse effect on the separate identity of Theale from Calcot and a degrading effect on the approach and gateway into Theale as an historic settlement. Furthermore, the proposals will have an adverse effect on identified valued landscape features and qualities. The proposals will also exacerbate detractors by proposing large scale buildings within this highly visible area. The proposals also do not contribute as set out within WBCLCA (2019) to the landscape strategy for this area. Although Arlington Business is located to the south, this area is not set adjacent to the site and is clearly separated from the site by the elevated wooded embankment which contains the Bath Road. The A4/Bath Road provides a clear division of the historic village of Theale from the business parks to the south of the A4/Bath Road Therefore, as shown, the proposals do not comply with Policy CS14 and CS19.
- 12.8 The proposed buildings, car parking, lorry parks and access roads will degrade an important open site at the entrance to the historic village of Theale. The proposals will also reduce the separation of Theale and Calcot creating one continuous area of development. therefore, as detailed above the proposal is contrary to the NPPF and to Local Plan policies, CS14, CS19 and ADPP5 as stated.

WEST BERKSHIRE COUNCIL

PLANNING APPLICATION NO24/00145/FULMAJ

FULL PLANNING APPLICATION FOR THE CONSTRUCTION OF 2 EMPLOYMENT UNITS FOR FLEXIBLE USES WITHIN CLASS E (LIGHT INDUSTRIAL), B2 AND/OR B8 OF THE USE CLASSES ORDER (INCLUDING ANCILLARY OFFICE PROVISION) WITH ASSOCIATED ENABLING WORKS, ACCESS FROM HOAD WAY, PARKING AND LANDSCAPING. LAND BOUNDED BY HOAD WAY AND M4 AND HIGH STREET THEALE READING

Landscape comments on the submitted additional information

1. INTRODUCTION AND SUMMARY

- 1.0 In September 2022, a Landscape Sensitivity and Capacity Assessment (LSCA) was undertaken for this site by West Berkshire Council. This assessment concluded... *If this site was developed, either in whole or in part, it would compromise the setting of Theale and its separate identity and character from Calcot. It is therefore recommended the site is not developed for employment uses.*
- 1.2 Part of the assessment process (LSCA), considered if any mitigation measures could reduce the overall effect of development on the site. It was assessed that this also could not be successfully achieved.
- 1.3 In June 2024, West Berkshire Council were asked by the applicant to provide a review of an updated scheme with detailed consideration given to the mitigation and tree planting that the scheme is providing. This report sets out this request based on the following additional submissions:
- Site Plan Dwg. No. 131001 Rev. P08
 - Illustrative Landscape Masterplan Dwg. No. 01 Rev. E
 - Soft Landscaping Plan – Dwg. No. 02 Rev. F
 - Plant Schedule – Dwg. No. 03 Rev. C
 - Hard Landscaping Plan – Dwg. No. 04 Rev. E
 - Landscaped Cross Section Dwg. No. 05, Rev 00 July 2024
 - Design and Access Statement Landscape Strategy Rev. F prepared by Turley
 - Landscape Response (Planning) Note, prepared by Turley (dated 25th June 2024)
 - LVIA Response Note, prepared by Turley (dated June 2024)
 - Updated CGI Visualisations. – *not submitted*

2. CHANGES TO THE SITE LAYOUT:

- 2.1 The scheme has also been revised, with changes as stated by the applicant as follows:
- *Revised pedestrian footpath route from Hoad Way to High Street to shorten its length and join the High Street at a closer point. This has resulted in consequential amendments to the layout*

including the relocation of the SuDs basin, albeit it remains the same size and additional planting has also been included due to the reduction in the footpath.

- A number of changes to the species mix to reflect comments from the Council's tree officer.
- Replacement of some of the smaller proposed tree planting with two mature oak trees to reflect comments from the Council's tree officer.

3. REVISED DRAWINGS/ PLANS AND SUBMISSIONS

- 3.1 Cross sections: This revised drawing clearly illustrates how the proposed building is out of character with Theale and will dwarf the adjacent residential buildings on the edge of the village. The cross sections also illustrate how there are no other large-scale buildings within the vicinity of the proposals.
- 3.2 As shown on the cross sections the building will be built on a 0.9m plinth above ground level. This increase in height was not taken into account within the photomontages and resulting visual assessment. Therefore, the visual assessment and photomontages are presently inaccurate and the visual impact of the buildings will be greater than what Turley has documented within their LVA.

4. MITIGATION MEASURES

- 4.1 Mitigation measures are described within Chapter 4 of the GLVIA3 and in detail under the heading of *Mitigation of landscape and visual effects* 4.21-4.37. The GLVIA3 states mitigation measures fall into three categories: primary; standard construction and operational management practices, and secondary measures. My report will assess how the proposed scheme has undertaken primary mitigation measures and then secondary mitigation measures.

Primary Measures

- 4.3 Primary mitigation measures are the changes/modifications to a proposed scheme which by a modified design could reduce the effect on the landscape. These would cover (to name a few) the siting, scale, height, façade treatment of buildings, point of access, levels, different land uses and proposed areas of soft landscaping (as listed within the GLVIA3 4.27).
- 4.4 Primary mitigation measures should be guided by local and national policy requirements. For this planning application, relevant landscape requirements are set out within the West Berkshire Landscape Character Assessment 2019 under the heading landscape strategy for the landscape character area ROI: Kennet Lower River with Open Water. Key numbered points from this strategy are as follows:
- 4.5 2) Conserve and enhance hedgerows, woodland strips and remaining pasture: The site is a grass/pasture field, which will be replaced with a large building footprint and hard standing, leaving a very small area of grass at the eastern end. This is not conserving and enhancing remaining areas of pasture, it is substantially reducing an area of pasture in a highly visible location.
- 4.6 3) Respect the setting of historic features within the landscape: Theale is listed under valued features and qualities within the WBLCA2019 as – *the historic village of Theale, which also contains a number of listed buildings including the Grade I Listed Church of the Holy Trinity*. As shown, there are open views across the application site as an open field of grass across to the village of Theale, with the spire of the church clearly visible on the skyline, The development proposals from a number of locations will result in an adverse effect on these views and the overall setting of Theal village

within the landscape. Additionally, the proposed development will introduce a large-scale building, an expansive area of hardstanding into an area which is characterised by small scale residential buildings within a historic structure.

- 4.7 4) Maintain distinction and sense of separation between the settlements of Theale and Calcot: the distinction between the settlements of Theale and Calcot and the role of the landscape as a setting to the character of those individual settlements should be respected. The development proposals will reduce the physical separation of Theale from Calcot. This reduction is also within a highly visible area.
- 4.8 Due to the unsuitable location, the applicant has not been able through modifications of the siting, scale of development, height, design and façade treatment to reduce the adverse effect of the proposed development on the landscape and visual receptors to an acceptable level.

Secondary Mitigation Measures

- 4.9 As within stated within West Berkshire Council landscape comments (20th May 2024), the proposed soft landscaping including the tree planting will do little in mitigating the proposals on the listed sensitive visual and landscape receptors
- 4.10 A few points regarding the soft landscaping plan and Design and Access statement are as follows:
- All the proposed trees are deciduous, which within the winter months without their leaves will provide very little screening and integration of the proposed development. A winter visual assessment within the LVA was not clearly provided acknowledging this, also no winter photomontages were provided which would have illustrated how visible the proposed building would be even at Year 15.
 - Trees take time to mature. The success of mitigation measures by industry standards are assessed at Year 15. Recognised by the industry, standard tree growths need to be applied for the Year 15 assessment, the LVA did not reference and state any. The LVA stated the proposed trees may have been selected for their large mature size, but this will take between 100-150 years.
 - The majority of the 'existing tree/vegetation to be retained' within the site have not been retained. With the majority of the trees and vegetation shown to be retained located off site and not within the applicant's ownership or control. Furthermore, this off-site existing tree planting adjacent the Bath Road roundabout and then extending along Hoad Way contains a number of juvenile trees of limited value and trees with Ash dieback. The D&A Statement has overestimated the strength of this offsite vegetation as ... *well established semi mature trees*, which is clearly not the case.
 - Due to the expansive service yard on the southern side of the building, the requirement under the overhead pylons to remain tree free, this will result in the eastern and western facades of the building being very open. Along with the intervening tree free highway embankment, the elevated location of Junction 12, the proposed building will be always remain visible in this sensitive location. Please note the View 5 photomontage for Year 15, I have questioned the accuracy, as the proposed trees to be planted in the corner of the application site will be 9m lower than the roundabout/junction 12, therefore the height of the proposed trees shown are not accurate

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- Due to the location of the SUDS attenuation basin this is shown to restrict areas for mitigation measures/tree planting leaving the northern side of the proposed building permanently open to views from the adjacent High Street
- The realignment of the proposed footpath has reduced the space available for tree planting, resulting in an increased adverse visual effect from areas within the small park north of the High Street.
- The proposed two semi mature standard trees will not create prominent landscape features within the eastern end of the site. The previous oak trees were located on an old hedgerow line within the middle of the field, the proposed trees form part of the edge treatment planting

5. SUMMARY

- 5.1 The open character of the site provides a setting and separate identity from Calcot for the historic village of Theale. Due to the location of the site, the size and character of the proposed development this will have an adverse effect on this constraint. The overall concept for the proposed secondary mitigation measures have been to screen and integrate the proposals, which due to the location of the site, size and scale of the development has also been shown not to be achievable.