

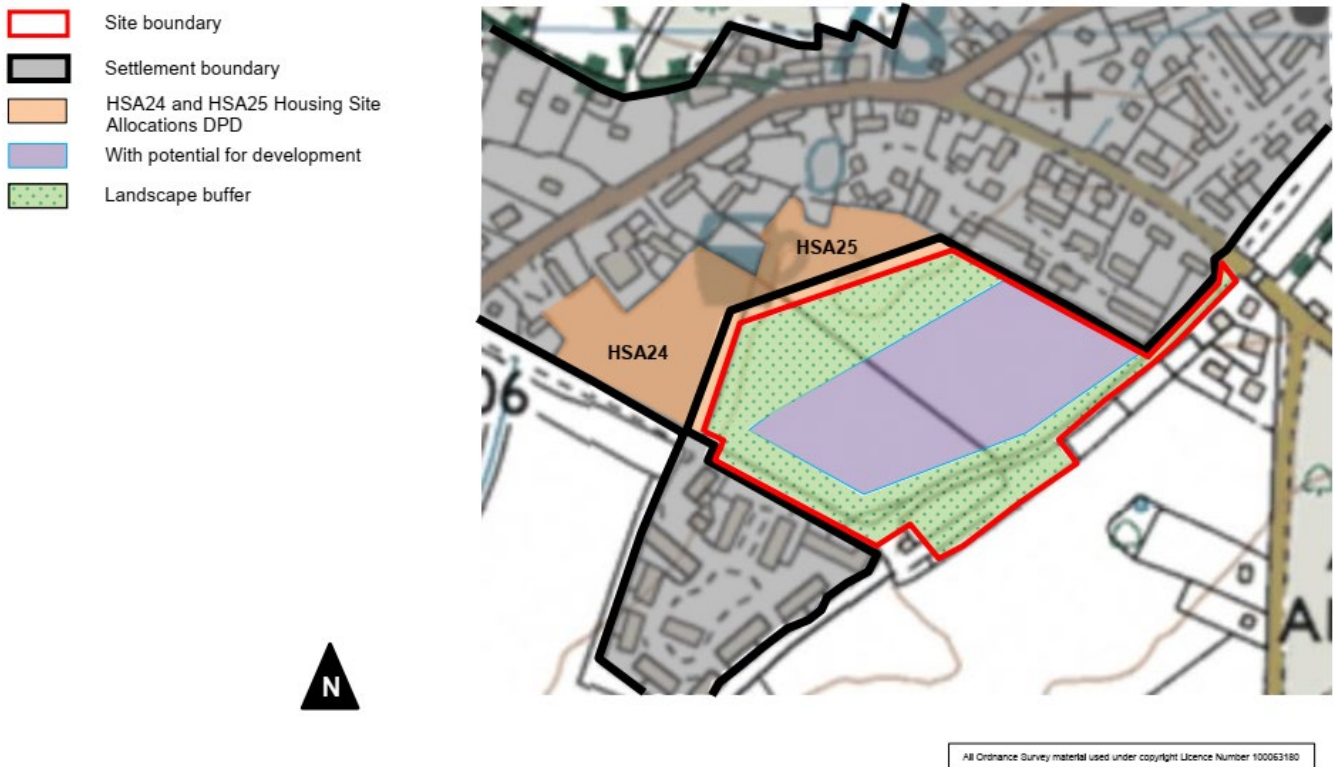
WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039 PROPOSED SUBMISSION (REG 19)

Response by Hermitage Neighbourhood Plan Steering Group

23rd February 2023

1. The Hermitage Neighbourhood Plan Group wishes to **OBJECT** to the proposed Submission Version of the West Berkshire Local Plan Review (WBLPR). In respect of the strategy and site allocations for Hermitage, the plan is not sound for the following reasons:
 - a. It is not justified because it has not been based on proportionate evidence.
 - b. It is not consistent with national policy because it does not demonstrate that it will enable the delivery of sustainable development.
2. The WBLPR proposes the allocation of three sites:
 - a. RSA20 – Land off Charlotte Close – for approximately 15 dwellings
 - b. RSA21 – Land to the south east of the Old Farmhouse – for approximately 10 dwellings
 - c. RSA22 – Land adjacent to Station Road – for approximately 34 dwellings.
3. These three sites are intended to deliver approximately 59 dwellings over the plan period. The Regulation 18 version of the WBLPR required approximately 45 dwellings for Hermitage, therefore the proposed submission version represents an uplift in the requirement of 14 dwellings. Moreover, sites RSA20 and RSA21 both now have planning permission for a total of 12 dwellings more than the figure in the WBLPR (an additional 1 dwelling on RSA20 and 11 more dwellings on RSA21). So, at Regulation 18 stage, Hermitage was required to deliver approximately 45 dwellings and now, taking into account site allocations that have already entered the planning pipeline, that figure has risen to 76 dwellings. The Hermitage Neighbourhood Plan Steering Group is not aware of any evidence that has been submitted to assess the cumulative impact of this additional development on the village.
4. Whilst this level of growth may be lower in absolute terms than many other settlements, Hermitage sits in a very sensitive location, being within the North Wessex Downs AONB. The overall scale of growth proposed for the settlements in this area is substantially lower than either the Eastern Area or Newbury and Thatcham, which reflects this sensitivity. However, it appears that in the case of Hermitage at least, the strategy of limiting growth in this part of the district is not being properly observed by a combination of the scales of growth proposed on WBLPR site allocations and development management decision-making on individual planning applications in respect of two of these site allocations.
5. The main difference between the Regulation 18 and Submission Versions of the WBLPR is the allocation of RSA22 – land adjacent to Station Road – for 34 dwellings. Whilst the Hermitage Neighbourhood Plan Group does not object to the principle of allocating this site, it has significant concerns that the evidence gathered through the Housing and Economic Land Availability Assessment (HELAA) process has not been used to inform Policy RSA22.
6. Under the assessment of suitability (Stage 2b), the HELAA cites the Landscape Sensitivity and Capacity Assessment 2022. This concludes that development across the whole site would have a significant impact on key landscape characteristic and valued features of this area of the AONB and would not be appropriate. It goes on to say that development across part of the site could be considered further, subject to the retention of boundary vegetation and the careful consideration of a central open area

which could have the character of a village green. It clearly recommends that development should be contained as indicated in the map below:



Source: Landscape Sensitivity and Capacity Assessment for Potential Housing Sites within West Berkshire, 2022 (land north of Station Road, Hermitage (HER4))

7. The map shows a significantly reduced area suitable for development than is shown in the WBLPR for RSA22. The purpose of this reduced area for development is to prevent the otherwise unacceptable landscape impact of development. The Assessment – supported by the map - goes on to say that development would be subject to the following requirements:
 - a. Set back from the existing regenerated treed railway line, with additional tree planting along this boundary to further reduce the visual effect of the development on the landscape to the south
 - b. Set back from Station Road to retain the rural character and the setting of the mature roadside trees.

8. Whilst the wording of Policy RSA22 states that development will be in accordance with the Landscape Sensitivity and Capacity Assessment 2022 and specifically identifies these requirements, the indicative plan supporting Policy RSA22 does not provide the appropriate guidance, suggesting that development could come close to the boundaries with the railway line and Station Road. In order for Policy RSA22 to be effective, it is necessary that the indicative plan is amended to be consistent with the plan shown in the Landscape Sensitivity and Capacity Assessment 2022 (and in these representations). This will make clear the extent of landscape buffers required to ensure the landscape impact is acceptable.

9. In this regard, the location of the site within the North Wessex AONB must be recognised. Paragraph 174 of the NPPF requires that planning policies contribute to and enhance the natural and local

environment by 'protecting and enhancing valued landscapes'. Moreover, paragraph 176 states that 'great weight should be given to conserving and enhancing landscape and scenic beauty' in the AONB. Furthermore it states that, 'the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.' The proposed Policy RSA22 does not provide the necessary clarity to ensure development achieves this, therefore it is not consistent with national policy.

10. A further reason that the Hermitage Neighbourhood Plan Steering Group is particularly concerned that Policy RSA22 and the accompanying indicative plan is clear and unambiguous is because no evidence has been submitted by the site promoter to demonstrate that the site is viable based on an allocation of approximately 34 dwellings. Policy RSA22 rightly requires a significant level of secondary works in order to ensure that development reflects the sensitive landscape setting in which the site sits. If the developer is unable to deliver a scheme for approximately 34 dwellings and instead requires a scale of development that is significantly in excess of this to ensure development is brought forward, then the site should not be allocated. In considering sites for allocation, it must be demonstrated that they are available, suitable and achievable. Planning Practice Guidance states, 'A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.' (Paragraph: 020 Reference ID: 3-020-20190722). Without evidence of the scale of development proposed in the policy being viable, Policy RSA22 is unsound because it has not been justified.

Hermitage Neighbourhood Plan Steering Group
Rosie Healy (Secretary)

