


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
	By email: planningpolicy@westberks.gov.uk
	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	4:30pm on Friday 3 March 2023

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

PART A: Your Details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.
- All information will be sent for examination by an independent inspector
- All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>

	Your details	Agent's details (if applicable)
Title:	Mr	Mrs
First Name:*	Fred	Brigid
Last Name:*	Schiff	Taylor
Job title (where relevant):	Director	Associate
Organisation (where relevant):	Hathor Property Limited	Bell Cornwell LLP
Address* Please include postcode:	Care of Bell Cornwell LLP Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY	Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY
Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

*Mandatory field

Part B – Your Representation***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Whole LPR Regulation 19 plan
Appendix:	
Policies Map:	
Other:	Evidence Base: <ul style="list-style-type: none"> • HELAA – published Jan 2023 • Site Selection Methodology – published Jan 2023 • Air Quality Assessment – published Jan 2023 • Transport Assessment • Employment Background Paper – published January 2023 • Flood Sequential Test Report – published January 2023 • Housing Background Paper – published January 2023

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☒

Please give reasons for your answer:

Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.

Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.

Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comment on full assessment of the impact of the proposed development strategy.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

Timing of production of evidence base:

We note that Proposed Submission Regulation 19 Local Plan review was presented to Full Council on 1 December, and the decision taken at that meeting to move towards public consultation. Yet the HELAA report containing assessment of proposed allocations and other available sites was not published until January 2023. The latest update prior to that was December 2020, so a number of changes and additions are expected in the interim. As such, the decision appears to have been taken by members to finalise the selected allocations for inclusion in the LPR, prior to them having had sight of the full range of HELAA site assessments. This raises doubts as to the soundness of the proposed allocations, given members could not have had a full appreciation of the range of options available for allocation, and the relative merits/ constraints associated with each.

Other key parts of the evidence base have also been finalised and published after key final decisions were taken on the strategy and proposed allocations, including:

- Air Quality Assessment – published Jan 2023

- Employment Background Paper – published January 2023
- Flood Sequential Test Report – published January 2023
- Housing Background Paper – published January 2023

Errors in evidence base:

It is also unfortunate to note that there are errors within the evidence base documents, which could contribute to a finding that the LPR is unsound. We shall not detail these in full, but by way of example:

- Site Selection Methodology, published January 2023, refers in paragraph 1.1 to the plan covering the period up to 2037 – which of course should be 2039;
- The Air Quality Assessment, published January 2023, is based on a plan period up to 2037, so has not assessed pollutant concentrations for the full plan period. The post script on page 10 notes that fact that the plan period has extended out to 2039 following production of the draft assessment, and that once the revised transport model forecasts for 2039 become available, further analysis will be required to confirm there are not significant differences from the assessment which is based on a plan period up to 2037. That work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination.
- Transport Assessment – phase 1 was completed in December 2020 and assesses a plan period up to 2037. Phase 2 modelling (July 2021) and assessment was also based on a 2037 end date. As such it is not clear that the full plan period has been assessed and that the effects of the large strategic development locations, up to 2039, are known. This is a key issue with the proposed development strategy, given the focus on larger strategic sites in edge of settlement locations. That assessment work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination, so that the public can comment meaningfully on it.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Update evidence base to assess full plan period, and revisit proposed site allocations following completion of that work. To include update to technical studies and whole plan viability. Undertake a further public consultation on the proposed plan/ allocations once the full suite of technical work is complete and up to date.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

✓

No

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	B Taylor	Date	3.3.2023
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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP1 (Spatial Strategy)
Appendix:	
Policies Map:	
Other:	HELAA Site Selection Methodology

1. Legally Compliant

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Do you consider the Local Plan Review is legally compliant?

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No

☒

Please give reasons for your answer:

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Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

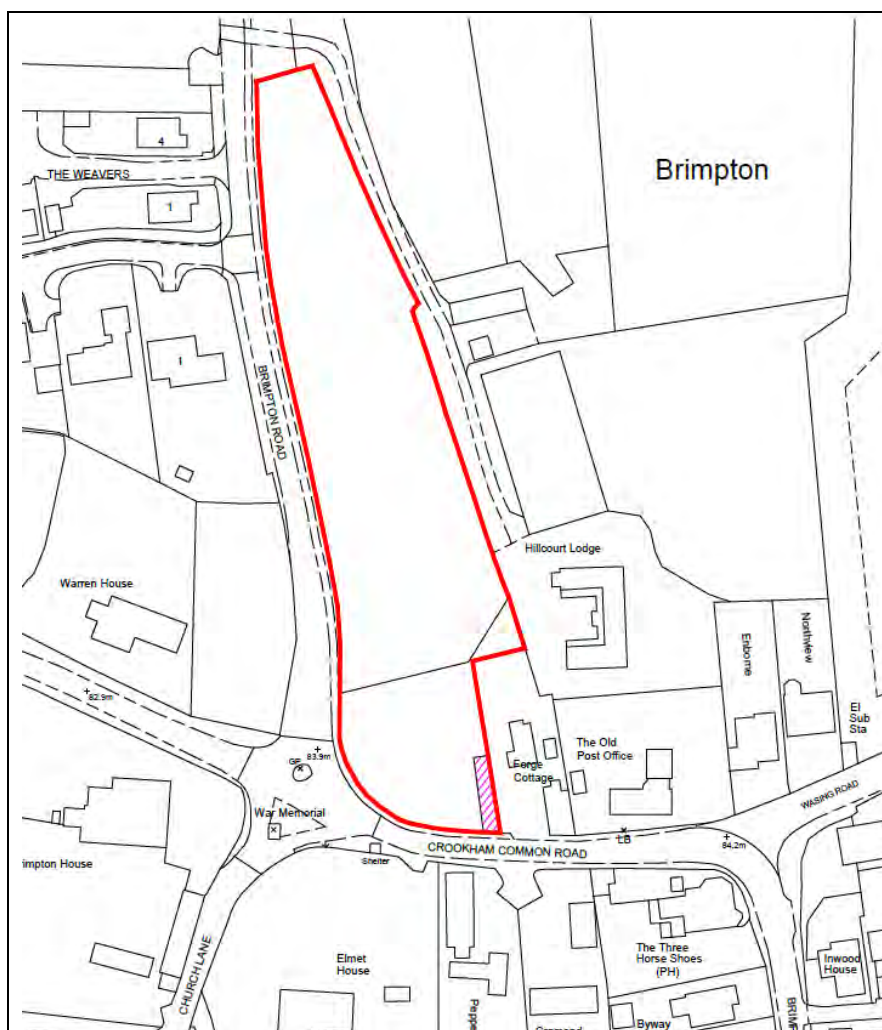
Please give reasons for your answer:

SP1 (Spatial Strategy) – our client is generally supportive of statement in this policy, of the aim to direct development to land of lower environmental value and previously developed land; and the support for appropriate densities to make efficient use of land. It is not clear, however, that the selected allocations are the best means of achieving this strategy, given the heavy reliance on large strategic developments on greenfield sites to meet housing need.

The proposed spatial strategy recognises there is a need to allocate greenfield sites, and that housing need cannot be met on brownfield sites alone. We agree this is realistic. However, there is some doubt that the LPR allocates a sufficient number of sites to ensure sufficient housing delivery in the initial 5 year period from adoption. In order to deliver a more robust land supply position, we submit there the Council should revisit its land supply assessment and seek to include additional small/ medium sites (such as our client's site in Brimpton) to ensure quick delivery of sites in the first five years of the plan. The housing land supply position (as at 31 March 2022) relies upon current allocations including the Sandleford Park strategic development location and the LPR also relies on delivery of large scale development at Thatcham. In the short term, there is a need to ensure delivery of sufficient number of dwellings in the early plan period and small/ medium sites must form part of the mix to ensure this.

Policy SP1 does not give adequate recognition of the requirement to plan for rural villages meeting their own needs. There is support expressed for the rural economy, but not for any rural housing. This is contrary to paragraph 79 of the NPPF, which requires that planning policies identify opportunities for villages to grow and thrive, especially where this will support local services. Paragraph 80 clarifies that policy should avoid the development of isolated homes in the countryside – but this should be interpreted in line with Braintree DC v SSCLG [2018] EWCA Civ.610 which confirms that 'isolated' means 'far away from other places, buildings or people; remote'. Villages such as Brimpton are not 'remote' or 'isolated' and indeed are in close proximity to the major urban areas of the district and beyond. The policy as worded will rely upon infill/ windfall housing in the existing settlement boundary to deliver any growth in villages such as Brimpton.

Our client's site in Brimpton partially within, and partially adjacent to the settlement boundary.



It is in fact located centrally within the village, in walking distance to the local primary school. It is not isolated, for the purposes of the NPPF, and therefore this LPR should contain policies which would allow for small scale infill development of this site, to support the growth of the village. As presently proposed, the LPR would not support development of the portion of the site outside the settlement boundary, even where the proposal amounted to infill and continuation of the building line, connecting to residential development to the north and south/east and reflecting built form on the opposite side of Brimpton road.

When consulting on the Settlement Boundary Review, the Brimpton Parish Council expressed support for the inclusion of our client's site within an amended boundary. The following is an extract from the appendices to the Settlement Boundary Review Background Paper (December 2022). It identifies the "parcel of land to the west of Forge Stores...and running north between Brimpton Road and the drive to Hilcourt Lodge...There may be a case for including the area within the Settlement Boundary and permitting suitable housing to join up with the building line at the southern end of the existing houses (Manor View) to the north). The Parish Council were of the view they would need to consult with the community before confirming it should be included, given the site's prominent location in the centre of the village and in close proximity to a public open space. They were unable to do so in the time allowed, so provided this feedback "in the hopes that, if a suitable housing development can be agreed, with both the landowner and the parish, this response will be taken into account when any planning application is considered."

This reinforces, therefore, that the settlement boundary could be amended to incorporate our client's site to the west of Brimpton Road.

Brimpton	Brimpton Parish Council	<p>Brimpton Parish Council has reviewed the current Settlement Boundary and is not proposing any changes at present. Brimpton is categorised in the Settlement Hierarchy as one of the "smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement". The current Settlement Boundary encloses the main built-up area of the settlement; and, as required in WBC's Settlement Boundary Criteria, "it protects the character of the settlement and prevents unrestricted growth into the countryside". The detailed criteria provided by WBC preclude extending the Settlement Boundary further into the countryside.</p> <p>There is, however, one area within the built-up area that has hitherto been excluded from the Settlement Boundary. It is the parcel of land to the west of the Forge Stores (now a hairdresser) and running north between Brimpton Road and the drive to Hillcourt Lodge (see map). There may be a case for including</p>	<p>Align to edge closest to settlement along Brimpton Road. Expand to include all of the rear curtilages of Enborne and North View, Wasing Road. Reduce boundary to align with curtilage of The Old Post Office, Brimpton Lane and exclude Hillcourt Lodge.</p>
		<p>this area within the Settlement Boundary and permitting suitable housing to join up with the building line of the southern end of the existing houses (Manor View) to the north.</p> <p>But it is a very sensitive piece of land as it is in the centre of the village; viewed by many existing houses; opposite a piece of land on the other side of Brimpton Road that has been designated an "Important Open Space" and so planning permission there was denied; and potentially creating access problems on a busy road. So any proposed new housing must address these points as well as meeting the call of the Brimpton Parish Plan 2019 for small houses which are affordable for first time buyers or retired down-sizers.</p> <p>Brimpton Parish Council, therefore, does not feel able to propose including this area in the Settlement Boundary until it has consulted widely with the community as well as the landowner to discover whether a suitable housing development could be achieved.</p> <p>Brimpton Parish Council recognises that its response will not meet the deadline for the current review of the Settlement Boundary; but it hopes that, if a suitable housing development can be agreed with both the landowner and the parish, this response will be taken into account when any planning application is considered.</p>	

The Parish Plan also expresses support for some additional housing development in the village:

"Support proposals (subject to compliance with planning regulations and the Village Design Statement) to build up to 10 small private houses over 10 years, affordable to first time buyers and people wishing to downsize, primarily through infilling."

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include additional site allocations, to ensure sufficient supply of housing in early plan period. In particular, allocate additional small/ medium sites (under 1ha) including our client's site in Brimpton where there is support for appropriate development which would relate well to the existing settlement. The Policy needs to be amended to include recognition of the need for rural villages to grow and thrive to support their vitality, as set out in the NPPF.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Section/paragraph:	
Policy:	SP3 (Settlement Hierarchy)
Appendix:	
Policies Map:	
Other:	Settlement Hierarchy Review Settlement Boundary Review

1. Legally Compliant

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Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

SP3 (Settlement Hierarchy) – Brimpton, where our client's land interest is situated, is classified as one of the smaller settlements (rather than a Service Village, Rural Service Centre or Urban Area). As such, any development outside the settlement boundary would be restricted to that allowed or under policy DM1. No allocations appear to be proposed in these settlements, contrary to the requirement in NPPF para 79 to plan for growth of rural villages. Rather, the villages would rely upon a limited number of infill or change of use/ windfall opportunities as allowed for within the settlement boundary under Policy SP1.

The Settlement Hierarchy evidence base document allocated Brimpton 10 points, based on the centre of the village being within 1km of:

- Primary School (3 points)
- Village Hall (3 points)
- Superfast Broadband (1 point)
- Community Transport Scheme (1 point)
- Public House (1 point)
- Place of Worship (1 point).

No recognition of the local sports facilities appears to have been given. Nor any points for being in close proximity (within 10km) of a Major Urban Centre.

The methodology utilised in the Settlement Hierarchy is too heavily focused upon accessibility to public transport – without accounting for modes of active travel (walking, cycling).

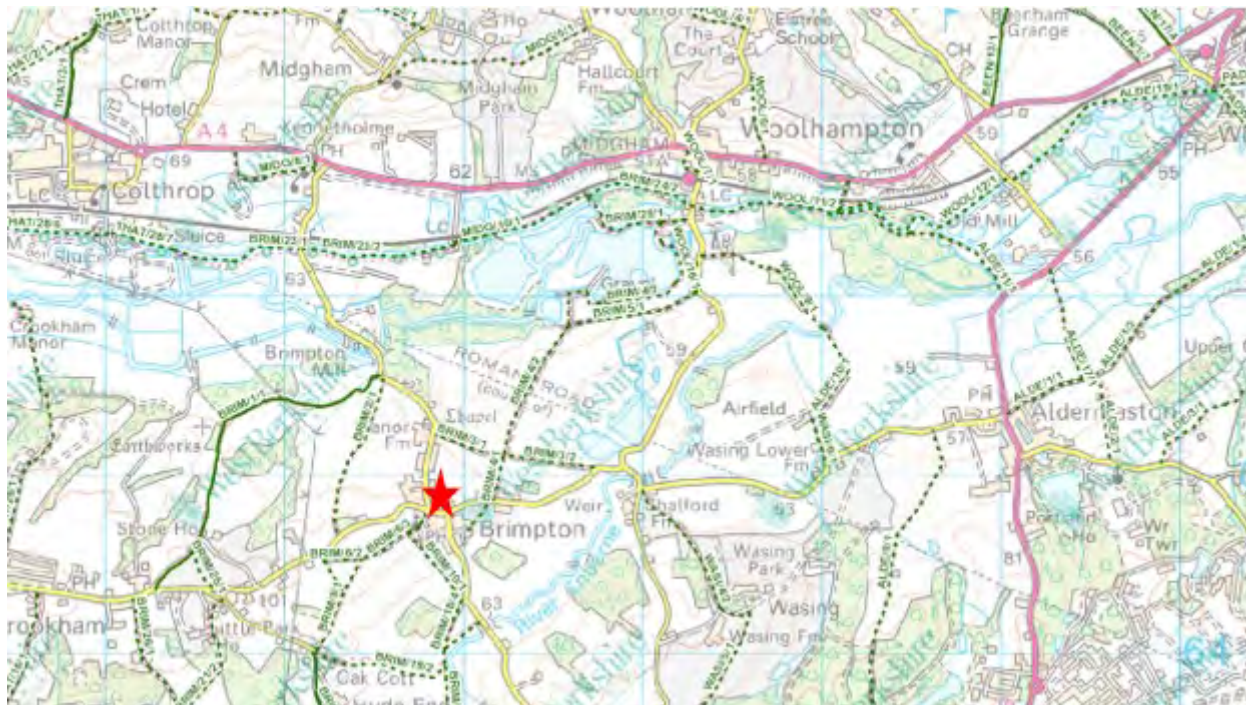
From Brimpton, it is a short cycle ride to many employment locations/ local services and facilities, including:

- Midgham Station: 10 minute cycle ride (1.9 miles)
- Thatcham Station: 15 min cycle ride (2.7 miles)
- Reading: 10 min cycle to Midgham followed by 17 minute commute by rail to Reading.
- Basingstoke: 10 minute (2.2 mile) cycle to Baughurst, then 25 min bus to Basingstoke

Hospital/35 to centre/ railway station

- Aldermaston: 13 mins cycle (2.2 miles)
- Greenham Common: 10 min cycle (2.2 miles)
- Newbury: 38 min cycle (7.2miles)

The extensive network of rights of way is shown below.



Extract of Definitive Map showing rights of way supporting active travel from the site

40% of the Brimpton population at present is retired, and may therefore be more reliant on the private car than active travel/ cycling for daily needs; Younger working age residents may be more likely to work at home a portion of the week, and commute to work 2-3 days. The ONS has indicated that 84% of workers who had to work from home during the pandemic said they intended to carry out a mix of home working/ working in the office in future¹. New housing in the village would be attractive to this younger cohort who wish to raise families in a village rather than an urban area – particularly given the presence of a primary school in the village. It is reasonable to assume that such households might have 1-2 occupants travelling to work in Newbury/ Thatcham/ Basingstoke/ Reading 2 or 3 times per week and could comfortably do so via active travel and public transport.

On this basis, we submit that smaller settlements such as Brimpton should be given more priority in the settlement hierarchy, to allow for some small scale development / extension of settlement boundaries so that the village can thrive and grow.

We note that a recent successful proposal for erection of 4 detached dwellings at Washoe Lodge in Brimpton Lane (reference 20/01825/FULD) attracted support from the community. Examples of the positive feedback provided, demonstrating a need for additional housing in the village, include:

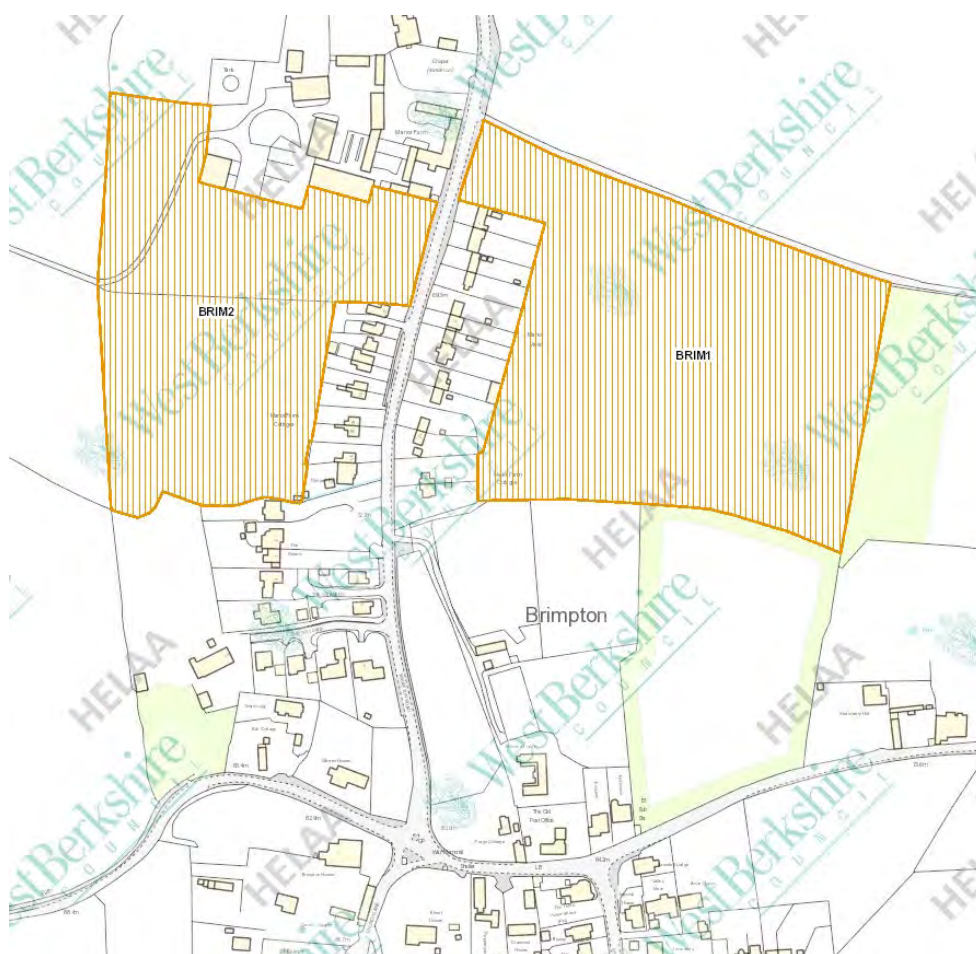
"I think this is a great opportunity for the village, and the local primary school. I have young children myself and would be interested in moving my family to a village location like this, which I can still commute to work easily using the local facilities at Midgham/ Thatcham train stations. There is often little opportunity to buy in this village or similar and having the opportunity to buy on a modern development would be ideal for growing families like myself."

“Nice village, needs more properties for families who commute with some good walks in the local area. Needs more developments with off road parking and garage space as local parking is not great. Would be keen to look at this development in the future once completed.”

“Great to see new development coming to Brimpton, I looked to move to this area recently but did not find any suitable new development.”

“As a local business owner and resident of Brimpton it is great to see more housing for Brimpton. It’s a well located village that seems to be slowly decaying through lack of investment, both the school and village facilities could do with more families in the area to help improve the village.”

Two potential allocations were assessed in the HELAA, these being BRIM1 and BRIM2, further north of our client’s site. (see figure below).



Both BRIM1 and BRIM2 were assessed as being adjacent to the settlement, and being greenfield/ agricultural sites available for residential redevelopment. A density of 30dh was considered. The HELAA stage 2b assessment considered whether development of these sites would be appropriate in the context of the existing settlement form, pattern and character of the landscape. For BRIM1 it was noted that “the site is located adjacent to existing linear development on Brimpton Road...some frontage development along Brimpton Road would continue the existing settlement form, however development of the whole site would be inappropriate in the context of the existing settlement form and pattern.” A similar conclusion was reached in respect of BRIM2 – ie that “some frontage development on part of the site” may be acceptable subject to further landscape assessment. For both, the conclusion was that development would be dependent on a review (and realignment) of the settlement boundary. This is because the Stage 2a assessment (development potential) found that Brimpton falls outside the settlement hierarchy and is therefore suitable only for limited infill development within the boundary.

Therefore, the evidence base and early LPR work has shown that:

- There is some Parish Council support for realignment of the settlement boundary to include our client's site, subject to public consultation and a suitable development proposal. This feedback was provide as part of consultation to the Settlement Boundary review;
- The parish Plan supports proposals for up to 10 additional houses in the village, particularly affordable housing or homes for downsizers;
- The public supported a recent proposal for 4 new homes in the village, demonstrating a need for housing for families and lack of suitable options;
- The HELAA demonstrates that the landscape could accommodate some infill development to the north of the site – a conclusion which must also rationally apply to our client's site.

Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement.

The only reason, it seems, for not allocating any additional housing in Brimpton, or altering the boundary to provide scope for infill, its rating in the Settlement Hierarchy. We have demonstrated above that the site is accessible by active transport to a number of services, facilities and employment centres. The Settlement Hierarchy review is overly focused upon public transport rather than other sustainable modes of transport, such as active travel (cycling and walking).

In the Eastern Spatial Area, no sites of less than 1ha have been proposed for allocation for general housing. The NPPF recognises the role that small sites can play in quick delivery of housing and requires that 10% of allocations be of small/ medium size. Given the LPR's reliance on large strategic development locations, we urge the Council to consider including this site within the settlement boundary and/ or allocating it for development in the LPR before submission to Independent Examination.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

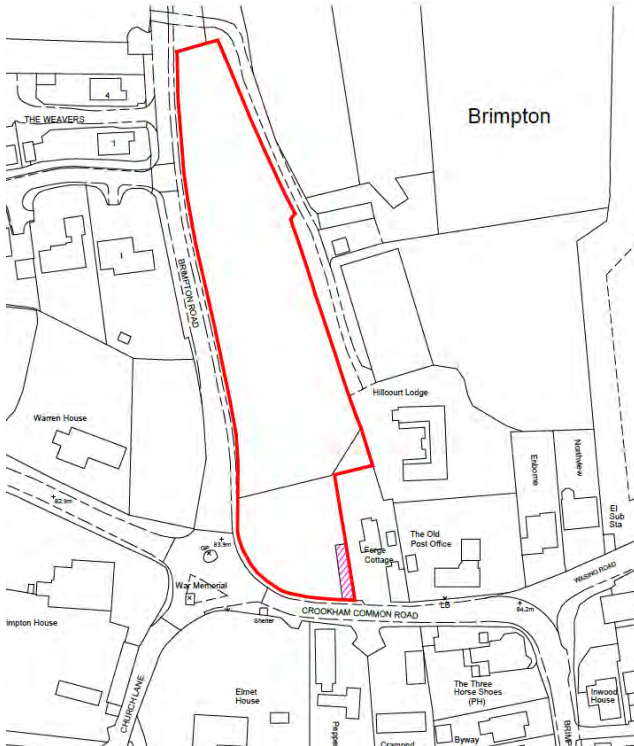
Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Allocate small sites less than 1ha in lower tier settlements such as Brimpton, to allow these rural villages to grow and thrive. In particular, allocate our client's site to the west of Brimpton Road, in the centre of Brimpton village which is immediately available for market and/or self and custom build housing to meet the needs identified by the Parish Council.



Revisit the Settlement Hierarchy report, and decision to only allocate sites in top three tiers of the hierarchy.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	B Taylor	Date	3.3.2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

**West Berkshire Local Plan Review 2022-2039****Proposed Submission Representation Form****Ref:***(For official use only)*

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
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	By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
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Please note the following:

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- All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>

	Your details	Agent's details (if applicable)
Title:	Mr	Mrs
First Name:*	Fred	Brigid
Last Name:*	Schiff	Taylor
Job title (where relevant):	Director	Associate
Organisation (where relevant):	Hathor Property Limited	Bell Cornwell LLP
Address* <i>Please include postcode:</i>	Care of Bell Cornwell LLP Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY	Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY
Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP5 (Responding to Climate Change)
Appendix:	
Policies Map:	
Other:	Whole plan viability assessment

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☒

Please give reasons for your answer:

As currently drafted the policy is not capable of giving the certainty required. It calls into doubt the accuracy of the whole plan viability assessment, which purports to assess the financial impact of a policy which is not clear on its scope of application.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

SP5 (Responding to Climate Change) – the policy is not clearly drafted. Requiring development 'to contribute to' carbon neutrality by 2030 is an admirable aim, but the expectations are not clearly set out here. Of key concern is the fact that the detailed requirements of sub clauses a) to m) (setting out carbon neutrality measures) will be expected "depending on the nature and scale of proposals". The expectation should be set out clearly so that developers know what will be expected of them and can factor this into the development models.

It is difficult to understand how the whole plan viability assessment has assessed the cost implications of policy SP5, when the policy itself does not give any indication what scale or type of development proposal will be subject to it. Our client supports efforts to improve building / energy standards and progress toward carbon neutrality; it simply wishes to ensure the expectations are clear, transparent, and applied equally so there is a level playing field.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy needs to be redrafted to make clear what scale of development will be subject to the requirements of the proposal. Remove words 'depending on the nature and scale of proposals' and replace with clear wording setting thresholds for application of the policy requirement.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
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The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

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Signature	B Taylor	Date	3.3.2023
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Title:	Mr	Mrs
First Name:*	Fred	Brigid
Last Name:*	Schiff	Taylor
Job title (where relevant):	Director	Associate
Organisation (where relevant):	Hathor Property Limited	Bell Cornwell LLP
Address* <i>Please include postcode:</i>	Care of Bell Cornwell LLP Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY	Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY
Email address:*		
Telephone number:		

*Mandatory field

Part B – Your Representation***Please use a separate sheet for each representation***

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP14 (Sites Allocated for Development in Eastern Area)
Appendix:	
Policies Map:	
Other:	HELAA

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☒

Please give reasons for your answer:

Site Selections and Reg 19 plan finalised and voted through for public consultation prior to finalisation of HELAA and full range of site assessments. Decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.

Public comments invited until 3 March, in the knowledge of proposed Full Council meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.

Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comments on full assessment of the impact of the proposed development strategy/ site allocations.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

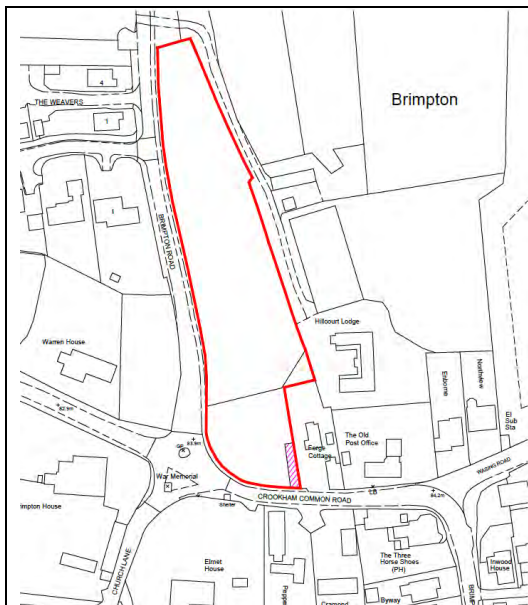
Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

SP14 (Sites Allocated for Development in the Eastern Area) – the LPR does not allocate any small sites, less than 1ha, for general residential development in the Eastern Area. Rather, it provides for a 65 bed care home (RSA6) and 8 pitches (RSA24). The NPPF (para 69) emphasises that small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. The LPR should accommodate at least 10% of the housing requirement on sites no larger than 1ha. We submit that it would be sensible to take this approach in *each* of the three spatial areas, including the Eastern Area.

Our client's site is located directly adjacent to the settlement boundary of Brimpton, is not in the AONB or at risk of flooding. Nor is it within the AWE DEPZ. It is available immediately and could provide small scale housing relatively quickly. Given the LPR's reliance on large strategic development locations which may take many years to gain planning permission, deliver necessary supporting infrastructure (such as schools) and become available for occupation, we submit that the Council should also allocate our client's site to boost delivery of small scale housing sites in the immediate short term.



3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

--

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Allocate land to the west of Brimpton Road, Brimpton, for small scale residential development. The site is not in the AONB or at risk of flooding and can be developed without adverse impact to heritage assets. Development could come forward as infill development continuing a gap in the building line north and south. This would deliver a small site less than 1ha in the Eastern area, where none is presently proposed. Rather than plan only delivers care home/ pitches on small sites in the Eastern Area.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
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Signature	B Taylor	Date	3.3.2023
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Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

*Mandatory field

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Additional Proposed Site Allocation in Eastern Area
Appendix:	
Policies Map:	
Other:	Settlement Hierarchy; Settlement Boundary Review

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☒

Please give reasons for your answer:

Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.

Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.

Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comment on full assessment of the impact of the proposed development strategy.

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

We propose our client's land as an additional site allocation in the Eastern Area. The land in which our client has an interest (see below) has not previously been submitted to, or assessed within the HELAA.



Left: Land at Brimpton which is suitable and available for development. Right: Brimpton Settlement Boundary

This 0.65ha parcel of land is partially within the settlement boundary (in the southern portion of the site near Forge Cottage) but otherwise directly adjacent to the boundary. As seen in Figure 1 (on the right) the form of the settlement is such that the site is encompassed within the settlement, with existing residential development to the north, west, south and directly adjacent to the lower part of the site to its west.

The Parish Council has previously expressed support for realignment of the settlement boundary to

include this site, subject to public consultation and the 'right' development coming forward (further detail is provided below). As can be seen from the mapping in Figure 1, an adjustment to the settlement boundary to include this site (to allow for small scale infill development on this land) would be appropriate to the historic form of the settlement. The site is well contained (by residential development) and the settlement boundary would prevent and further development beyond the site into the countryside.

Part of the site is within the Brimpton Conservation Area. A Heritage Impact Assessment has been prepared, to consider the heritage impacts of small scale housing on the site. The report concluded that such development would have a neutral impact on nearby listed buildings/ non designated heritage assets.

The part of the site which is in the Conservation Area is assessed as having no special historical or architectural interest and in fact recommends its removal from the designated area. Development of the site would have a negligible adverse effect on the setting of the Conservation Area. The report is attached for your review and consideration. We would highlight, in particular, the comment at paragraph 9.4.15 of that report regarding the decision to include this open area at Brimpton Road in the Conservation Area. This suggests that the Conservation Area boundary in Brimpton includes some arbitrary/ marginal areas which were perhaps erroneously included in the boundary when moving from paper to digital mapping in the 1980s.

The site is outside the AONB. The Landscape Character Assessment (Aug 2019) identifies the site as being within:

- National Landscape Character Area 129: Thames Basin Heaths
- West Berks Landscape Classification: WH2: Greenham Woodland and Heathland Mosaic. This area is defined by gently undulating slopes which rise to Greenham and Crookham Common further west of the site. The eastern area of WH2, in which Brimpton is situated, is "distinguished by the presence of a mix of arable and pasture contained by a network of woodlands." It describes Brimpton as a more "nucleated village, focused around the junction of Brimpton Road, Brimpton Lane, Crookham Common Road and Wasing Road." The site is situated right at the centre of the village, at the 'nucleus', as it were.

Being so centrally located within the village, the site is in easy walking distance of the local primary school (Brimpton CoE). No allocations have been proposed in Brimpton, despite the presence of local facilities and services, and close proximity to urban areas for employment. This is based on the settlement hierarchy report and its significant focus on public transport (as opposed to active travel) which is discussed further below.

From Brimpton, it is a short cycle ride to many employment locations/ local services and facilities, including:

- Midgham Station: 10 minute cycle ride (1.9 miles)
- Thatcham Station: 15 min cycle ride (2.7 miles)
- Reading: 10 min cycle to Midgham followed by 17 minute commute by rail to Reading.
- Basingstoke: 10 minute (2.2 mile) cycle to Baughurst, then 25 min bus to Basingstoke Hospital/35 to centre/ railway station
- Aldermaston: 13 mins cycle (2.2 miles)
- Greenham Common: 10 min cycle (2.2 miles)
- Newbury: 38 min cycle (7.2miles)

In the Eastern Spatial Area, no sites of less than 1ha have been proposed for allocation for general housing. The NPPF recognises the role that small sites can play in quick delivery of housing and requires that 10% of allocations be of small/ medium size. Given the LPR's reliance on large strategic development locations, we urge the Council to consider including this site within the settlement boundary and/ or allocating it for development in the LPR before submission to Independent Examination.

Please refer to our comments on SP3 and the Settlement Hierarchy and also SP1 (Spatial Strategy) and the Settlement Boundary Review.

In summary, the evidence base and early LPR work has shown that:

- There is some Parish Council support for realignment of the settlement boundary to include our client's site, subject to public consultation and a suitable development proposal. This feedback was provided as part of consultation to the Settlement Boundary review;
- The parish Plan supports proposals for up to 10 additional houses in the village, particularly affordable housing or homes for downsizers;
- The public supported a recent proposal for 4 new homes in the village, demonstrating a need for housing for families and lack of suitable options;
- The HELAA demonstrates that the landscape could accommodate some infill development to the north of the site – a conclusion which must also rationally apply to our client's site.
- Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement.
-

The only reason, it seems, for not allocating any additional housing in Brimpton, or altering the boundary to provide scope for infill, is its rating in the Settlement Hierarchy. Our representations on SP3 demonstrate that the site is accessible via active transport to a number of services, facilities and employment centres. The Settlement Hierarchy review is overly focused upon public transport rather than other sustainable modes of transport, such as active travel (cycling and walking). It also fails to take account of altered working patterns following the pandemic, with a large proportion of workers now working from home for part of the week, thereby reducing the need to travel/ commute to work.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

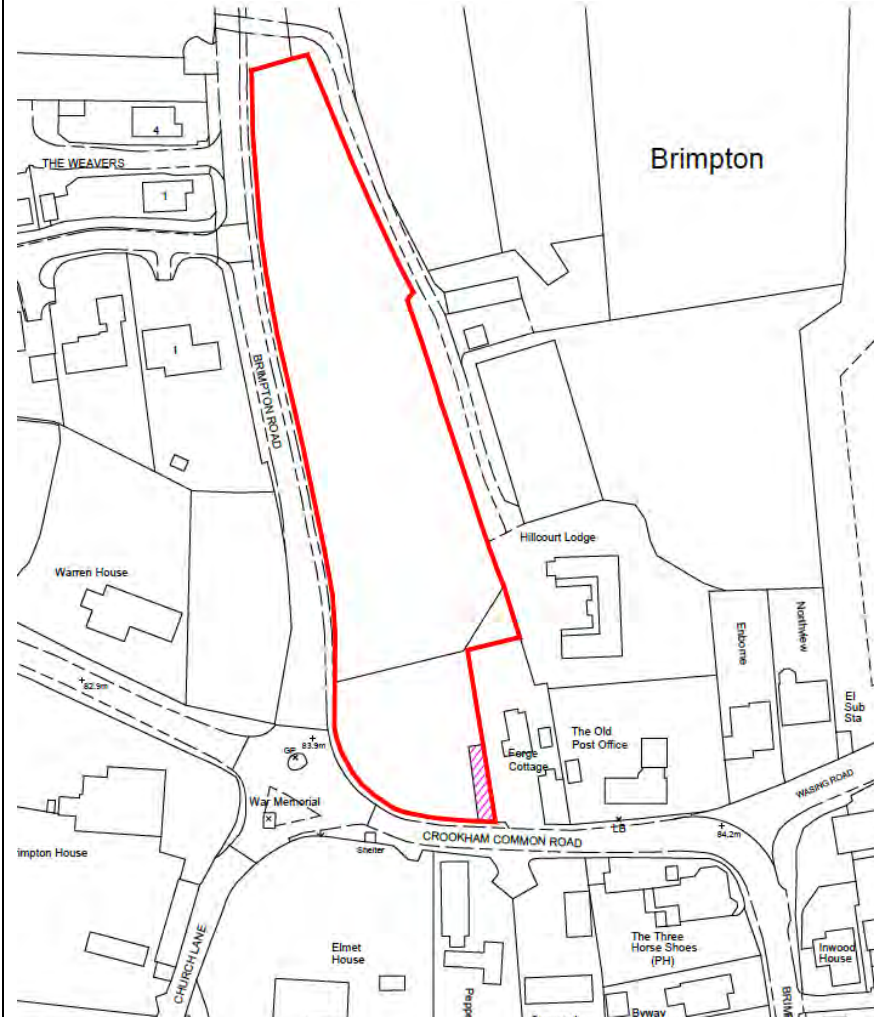
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Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include an additional site allocation in the Eastern Area – land to the west of Brimpton Road, Brimpton. The site is suitable for development and immediately available. As a site less than 1ha in size it offers the opportunity for quick delivery to boost housing delivery in the initial plan period whilst larger strategic development locations pursue planning permission.



5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	✓
The publication of the report of the Inspector appointed to carry out the examination	✓
The adoption of the Local Plan Review	✓

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	B Taylor	Date	3.3.2023
------------------	-----------------	-------------	-----------------

Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.


West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form
Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/kse
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	Your details	Agent's details (if applicable)
Title:	Mr	Mrs
First Name:*	Fred	Brigid
Last Name:*	Schiff	Taylor
Job title (where relevant):	Director	Associate
Organisation (where relevant):	Hathor Property Limited	Bell Cornwell LLP
Address* Please include postcode:	Care of Bell Cornwell LLP Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY	Unit 2, Meridian Office Park, Osborn Way, Hook Rg27 9HY
Email address:*		
Telephone number:		

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	DM1 (Residential Development in the Countryside)
Appendix:	
Policies Map:	
Other:	Settlement Boundary Review

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☐

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

DM1 (Residential Development in the Countryside) – this policy should be amended to support delivery of infill development or self or custom build plots in edge of settlement locations adjacent to settlement boundaries where the development would have an appropriate relationship to the existing form and pattern of development.

The policy allows for infill within settlement boundaries. In the case of our client's site in Brimpton, development would have all the features of infill, and would be supported were it in the boundary or in a village without a boundary. It would not, however, qualify at present due to the Council's decision not to amend the settlement boundary to follow the natural form and pattern of the settlement. Please also refer to separate comments made on the Settlement Boundary review (in relation to Policy SP1).

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

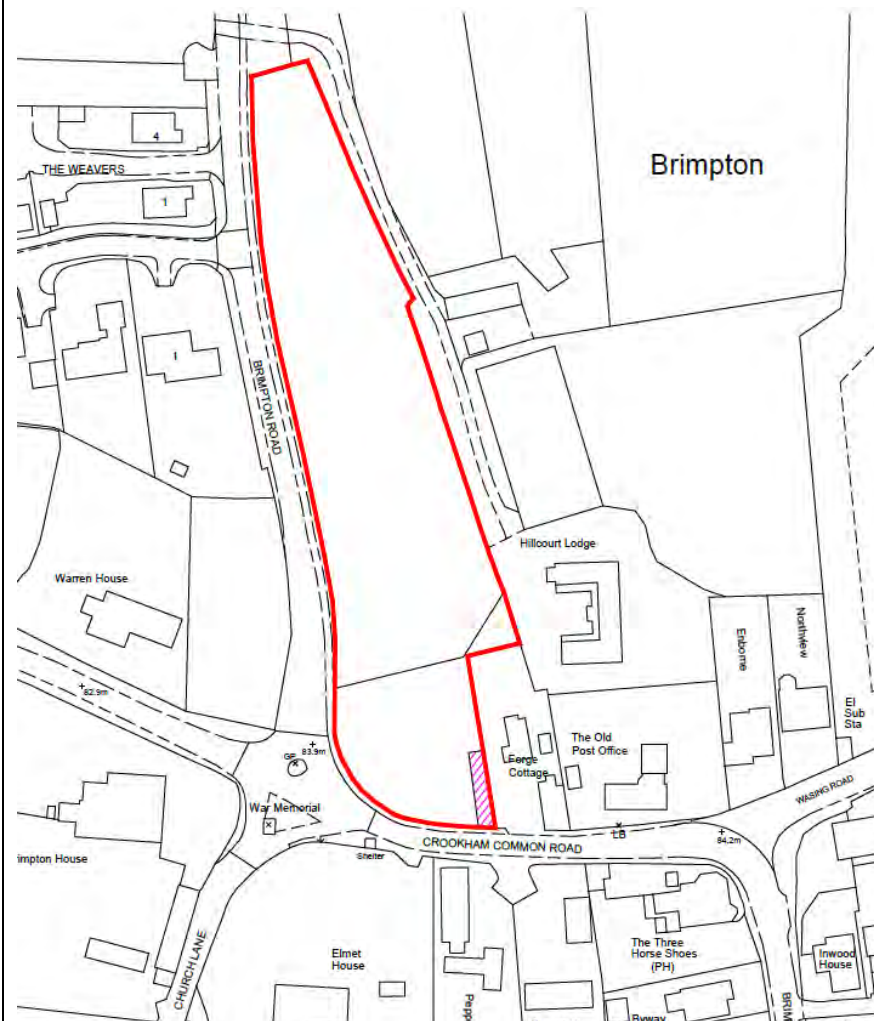
Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend settlement boundary to bring our client's site into the settlement at Brimpton, to allow for small scale infill development to meet local needs. The site is encompassed within the settlement, with residential dwellings to the north, west, south and part of the western boundary. As such the site is well contained, and realignment of the boundary would not give rise to any risk of continued encroachment into the countryside. There is support for small scale additional development in the village to support the local primary school, which is within walking distance of the site.



5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	<input checked="" type="checkbox"/>
The publication of the report of the Inspector appointed to carry out the examination	<input checked="" type="checkbox"/>
The adoption of the Local Plan Review	<input checked="" type="checkbox"/>

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	DM3 (Health and Wellbeing)
Appendix:	
Policies Map:	
Other:	Settlement Boundary Review; Settlement Hierarchy

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☐

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

DM3 (Health and Wellbeing) is supported. We would also suggest including express reference to the health and wellbeing benefits of residents of rural villages being able to stay within their local community as their needs change. Children should be able to buy a home near where they grew up, should they wish, to continue to provide support to their parents as they age. Older residents who are downsizing should have the option of staying in the community where they have social support and connections. Those with particular health/ accessibility needs should be able to commission/ self build a home to suit their needs. Residents should be able to find suitable housing to accommodate their needs without needing to relocate further away from their support network. Development which delivers small scale housing to meet local needs should be supported.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend policy to express support for development which supports rural villages, in allowing them to grow and thrive, and which provides for social limb of sustainability, in terms of residents being able to continue to live in communities where they can provide and receive support to others.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Please tick all that apply:

Tick

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Signature	B Taylor	Date	3.3.2023
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Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

*Mandatory field

Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Agent: Brigid Taylor, Bell Cornwell LLP Client: Hathor Property Limited
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	DM18 (Self and Custom Build Housing)
Appendix:	
Policies Map:	
Other:	SHMA, Housing Needs Assessment

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

☐

No

☐

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		✓

Please give reasons for your answer:

DM18 (Self and Custom Build Housing) is supported, as it is evidence of the Council's recognition of its statutory duty to consider demand for custom and self build housing in plan making. The LPR is required to be informed by housing need assessment which includes the needs of different groups, including those wishing to commission or build their own homes. Based on the latest Governmental data release (May 2022), West Berks Council granted planning permission for 29 serviced plots between 31 Oct 2020 and 30 Oct 2021. Data was not supplied to indicate the level of demand based on the number of people on your registers. This data should be transparent and published regularly. By way of comparison, in neighbouring Basingstoke and Deane there are 328 entries on the register. If demand is similar in West Berks, then delivery is falling woefully short. Therefore, policy which supports delivery of self and custom build is supported.

We note however, that this should not rely on delivery as part of large strategic development locations due to the time delays in such plots coming forward. Rather, policy should support delivery of self and custom build on small plots in a limited number settlements. Brimpton is one such location where a small number of sites could be delivered, to meet local demand for custom and self-build in close proximity to facilities such as the local primary school.

3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

☐

No

☐

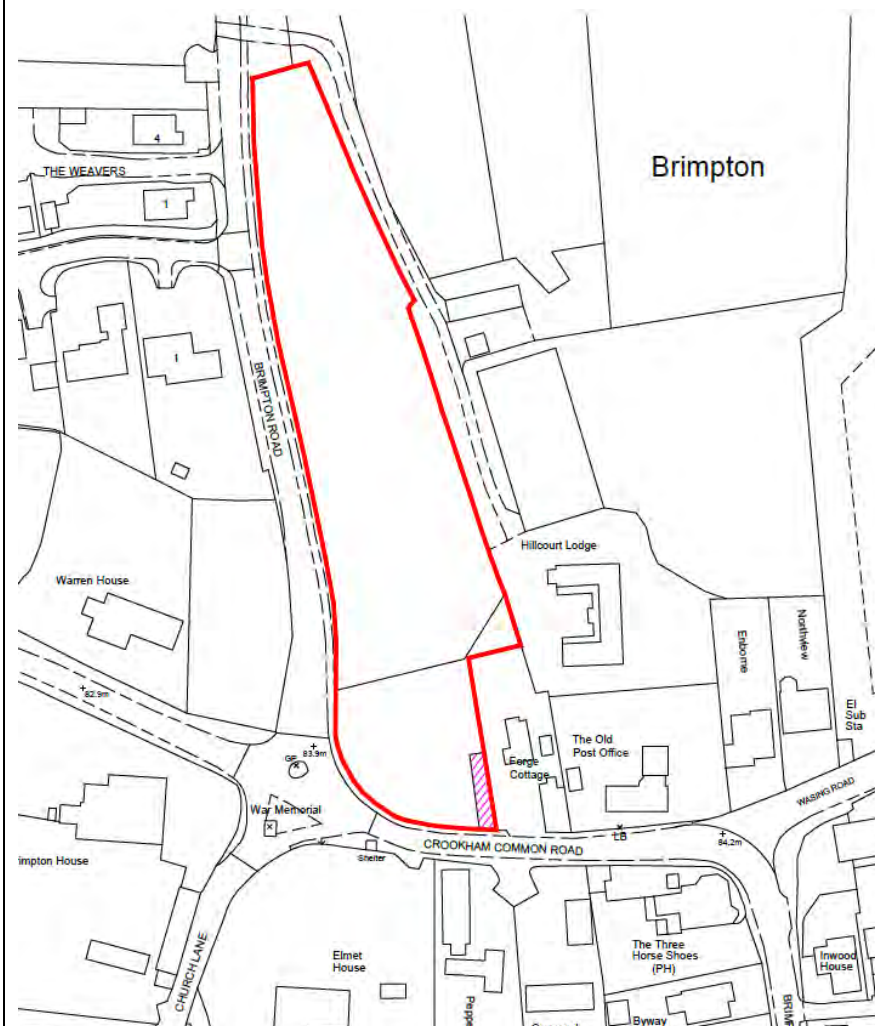
Please give reasons for your answer:

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Include site allocations for small scale self and custom build plots, rather than relying upon large strategic development sites to deliver these. Sites are available immediately, including our client's site in Brimpton, and could deliver small scale development to meet this identified need, in a way which is appropriate to the pattern and form of the settlement.



5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?

Yes

☒

No

☐

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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Please tick all that apply:

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Planning Policy
West Berkshire Council
BY EMAIL: planningpolicy@westberks.gov.uk

Our ref: 2919

03 March 2023

Dear Sir/ Madam

West Berkshire Regulation 19 Proposed Submission Local Plan Review to 2039 –Consultation Response

Introduction

Bell Cornwell submits these representations on behalf of Hathor Property Limited, a development company focused on high quality residential led development. Our client has an interest in land (via option) located in the centre of Brimpton, which is suitable and available for development.

These representations provide comments on the soundness of the Proposed Submission Local Plan Review ("LPR"), including comments on the proposed development strategy, the supporting evidence base and also the drafting of proposed spatial and development management policies.

The land in which our client has an interest (Figure 1) has not previously been submitted to, or assessed within the HELAA. The Council has indicated that sites may be submitted at any time, and therefore we have also enclosed a Site Submission form. This 0.65ha parcel of land is partially within the settlement boundary (in the southern portion of the site near Forge Cottage) but otherwise directly adjacent to the boundary. As seen in Figure 1 (on the right) the form of the settlement is such that the site is encompassed within the settlement, with existing residential development to the north, west, south and directly adjacent to the lower part of the site to its west.

The Parish Council has previously expressed support for realignment of the settlement boundary to include this site, subject to public consultation and the 'right' development coming forward (further detail is provided below). As can be seen from the mapping in Figure 1, an adjustment to the settlement boundary to include this site (to allow for small scale infill development on this land) would be appropriate to the historic form of the settlement. The site is well contained (by residential development) and the settlement boundary would prevent and further development beyond the site into the countryside.

Part of the site is within the Brimpton Conservation Area. A Heritage Impact Assessment has been prepared, to consider the heritage impacts of small scale housing on the site. The report concluded that such development would have a neutral impact on nearby listed buildings/ non designated heritage assets.



The part of the site which is in the Conservation Area is assessed as having no special historical or architectural interest and in fact recommends its removal from the designated area. Development of the site would have a negligible adverse effect on the setting of the Conservation Area. The report is attached for your review and consideration. We would highlight, in particular, the comment at paragraph 9.4.15 of that report regarding the decision to include this open area at Brimpton Road in the Conservation Area. This suggests that the Conservation Area boundary in Brimpton includes some arbitrary/ marginal areas which were perhaps erroneously included in the boundary when moving from paper to digital mapping in the 1980s.



Figure 1 Left: Land at Brimpton which is suitable and available for development. Right: Brimpton Settlement Boundary

The site is outside the AONB. The Landscape Character Assessment (Aug 2019) identifies the site as being within:

- National Landscape Character Area 129: Thames Basin Heaths
- West Berks Landscape Classification: WH2: Greenham Woodland and Heathland Mosaic (see map extract below). This area is defined by gently undulating slopes which rise to Greenham and Crookham Common further west of the site. The eastern area of WH2, in which Brimpton is situated, is “distinguished by the presence of a mix of arable and pasture contained by a network of woodlands.” It describes Brimpton as a more “nucleated village, focused around the junction of Brimpton Road, Brimpton Lane, Crookham Common Road and Wasing Road.” The site is situated right at the centre of the village, at the ‘nucleus’, as it were.



Figure 2 Extract of LCA 2019 with site location marked

Being so centrally located within the village, the site is in easy walking distance of the local primary school (Brimpton CoE). No allocations have been proposed in Brimpton, despite the presence of local facilities and services, and close proximity to urban areas for employment. This is based on the settlement hierarchy report and its significant focus on public transport (as opposed to active travel) which is discussed further below.

From Brimpton, it is a short cycle ride to many employment locations/ local services and facilities, including:

- Midgham Station: 10 minute cycle ride (1.9 miles)
- Thatcham Station: 15 min cycle ride (2.7 miles)
- Reading: 10 min cycle to Midgham followed by 17 minute commute by rail to Reading.
- Basingstoke: 10 minute (2.2 mile) cycle to Baughurst, then 25 min bus to Basingstoke Hospital/35 to centre/ railway station
- Aldermaston: 13 mins cycle (2.2 miles)
- Greenham Common: 10 min cycle (2.2 miles)
- Newbury: 38 min cycle (7.2miles)

The extensive network of rights of way is shown below.



Figure 3 Extract of Definitive Map showing rights of way supporting active travel from the site

In the Eastern Spatial Area, no sites of less than 1ha have been proposed for allocation for general housing. The NPPF recognises the role that small sites can play in quick delivery of housing and requires that 10% of allocations be of small/ medium size. Given the LPR's reliance on large strategic development locations, we urge the Council to consider including this site within the settlement boundary and/ or allocating it for development in the LPR before submission to Independent Examination.

Response to the Regulation 19 Proposed Submission Local Plan Consultation

Timing of production of evidence base

We note that Proposed Submission Regulation 19 Local Plan review was presented to Full Council on 1 December, and the decision taken at that meeting to move towards public consultation. Yet the HELAA report containing assessment of proposed allocations and other available sites was not published until January 2023. The latest update prior to that was December 2020, so a number of changes and additions are expected in the interim. As such, the decision appears to have been taken by members to finalise the selected allocations for inclusion in the LPR, prior to them having had sight of the full range of HELAA site assessments. This raises doubts as to the soundness of the proposed allocations, given members could not have had a full appreciation of the range of options available for allocation, and the relative merits/ constraints associated with each.

Other key parts of the evidence base have also been finalised and published after key final decisions were taken on the strategy and proposed allocations, including:

- Air Quality Assessment – published Jan 2023
- Employment Background Paper – published January 2023
- Flood Sequential Test Report – published January 2023
- Housing Background Paper – published January 2023



Errors in evidence base

It is also unfortunate to note that there are errors within the evidence base documents, which could contribute to a finding that the LPR is unsound. We shall not detail these in full, but by way of example:

- Site Selection Methodology, published January 2023, refers in paragraph 1.1 to the plan covering the period up to 2037 – which of course should be 2039;
- The Air Quality Assessment, published January 2023, is based on a plan period up to 2037, so has not assessed pollutant concentrations for the full plan period. The post script on page 10 notes that fact that the plan period has extended out to 2039 following production of the draft assessment, and that once the revised transport model forecasts for 2039 become available, further analysis will be required to confirm there are not significant differences from the assessment which is based on a plan period up to 2037. That work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination.
- Transport Assessment – phase 1 was completed in December 2020 and assesses a plan period up to 2037. Phase 2 modelling (July 2021) and assessment was also based on a 2037 end date. As such it is not clear that the full plan period has been assessed and that the effects of the large strategic development locations, up to 2039, are known. This is a key issue with the proposed development strategy, given the focus on larger strategic sites in edge of settlement locations. That assessment work should be carried out prior to the Regulation 19 consultation and submission to Independent Examination, so that the public can comment meaningfully on it.

Strategic Policies:

SP1 (Spatial Strategy) – our client is generally supportive of this policy, and the aim to direct development to land of lower environmental value and previously developed land; and the support for appropriate densities to make efficient use of land. It is not clear, however, that the selected allocations are the best means of achieving this strategy, given the heavy reliance on large strategic developments on greenfield sites to meet housing need.

The proposed spatial strategy recognises there is a need to allocate greenfield sites, and that housing need cannot be met on brownfield sites alone. We agree this is realistic. However, there is some doubt that the LPR allocates a sufficient number of sites to ensure sufficient housing delivery in the initial 5 year period from adoption. In order to deliver a more robust land supply position, we submit there the Council should revisit its land supply assessment and seek to include additional small/ medium sites (such as our client's site in Brimpton) to ensure quick delivery of sites in the first five years of the plan. The housing land supply position (as at 31 March 2022) relies upon current allocations including the Sandleford Park strategic development location and the LPR also relies on delivery of large scale development at Thatcham. In the short term, there is a need to ensure delivery of sufficient number of dwellings in the early plan period and small/ medium sites must form part of the mix to ensure this.

Policy SP1 does not give adequate recognition of the requirement to plan for rural villages meeting their own needs. There is support expressed for the rural economy, but not for any rural housing. This is contrary to paragraph 79 of the NPPF, which requires that planning policies identify opportunities for villages to grow and thrive, especially where this will support local services. Paragraph 80 clarifies that policy should avoid the development of isolated homes in the countryside – but this should be interpreted in line with *Braintree DC v SSCLG* [2018] EWCA Civ.610 which confirms that 'isolated' means 'far away from other places, buildings or people; remote'. Villages such as Brimpton are not 'remote' or 'isolated' and



indeed are in close proximity to the major urban areas of the district and beyond. The policy as worded will rely upon infill/ windfall housing in the existing settlement boundary to deliver any growth in villages such as Brimpton.

Our client's site in Brimpton partially within, and partially adjacent to the settlement boundary. It is in fact located centrally within the village, in walking distance to the local primary school. It is not isolated, for the purposes of the NPPF, and therefore this LPR should contain policies which would allow for small scale infill development of this site, to support the growth of the village. As presently proposed, the LPR would not support development of the portion of the site outside the settlement boundary, even where the proposal amounted to infill and continuation of the building line, connecting to residential development to the north and south/east and reflecting built form on the opposite side of Brimpton road.

When consulting on the Settlement Boundary Review, the Brimpton Parish Council expressed support for the inclusion of our client's site within an amended boundary. The following is an extract from the appendices to the Settlement Boundary Review Background Paper (December 2022). It identifies the "parcel of land to the west of Forge Stores...and running north between Brimpton Road and the drive to Hilcourt Lodge...There may be a case for including the area within the Settlement Boundary and permitting suitable housing to join up with the building line at the southern end of the existing houses (Manor View) to the north). The Parish Council were of the view they would need to consult with the community before confirming it should be included, given the site's prominent location in the centre of the village and in close proximity to a public open space. They were unable to do so in the time allowed, so provided this feedback "in the hopes that, it a suitable housing development can be agreed, with both the landowner and the parish, this response will be taken into account when any planning application is considered."

This reinforces, therefore, that the settlement boundary could be amended to incorporate our client's site to the west of Brimpton Road.

Brimpton	Brimpton Parish Council	<p>Brimpton Parish Council has reviewed the current Settlement Boundary and is not proposing any changes at present. Brimpton is categorised in the Settlement Hierarchy as one of the "smaller villages with settlement boundaries - suitable only for limited infill development: subject to the character and form of the settlement". The current Settlement Boundary encloses the main built-up area of the settlement; and, as required in WBC's Settlement Boundary Criteria, "it protects the character of the settlement and prevents unrestricted growth into the countryside".</p> <p>The detailed criteria provided by WBC preclude extending the Settlement Boundary further into the countryside.</p> <p>There is, however, one area within the built-up area that has hitherto been excluded from the Settlement Boundary. It is the parcel of land to the west of the Forge Stores (now a hairdresser) and running north between Brimpton Road and the drive to Hilcourt Lodge (see map). There may be a case for including</p>	<p>Align to edge closest to settlement along Brimpton Road. Expand to include all of the rear curtilages of Enborne and North View, Wasing Road. Reduce boundary to align with curtilage of The Old Post Office, Brimpton Lane and exclude Hilcourt Lodge.</p>
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		<p>this area within the Settlement Boundary and permitting suitable housing to join up with the building line of the southern end of the existing houses (Manor View) to the north.</p> <p>But it is a very sensitive piece of land as it is in the centre of the village; viewed by many existing houses; opposite a piece of land on the other side of Brimpton Road that has been designated an "Important Open Space" and so planning permission there was denied; and potentially creating access problems on a busy road. So any proposed new housing must address these points as well as meeting the call of the Brimpton Parish Plan 2019 for small houses which are affordable for first time buyers or retired down-sizers.</p> <p>Brimpton Parish Council, therefore, does not feel able to propose including this area in the Settlement Boundary until it has consulted widely with the community as well as the landowner to discover whether a suitable housing development could be achieved.</p> <p>Brimpton Parish Council recognises that its response will not meet the deadline for the current review of the Settlement Boundary; but it hopes that, if a suitable housing development can be agreed with both the landowner and the parish, this response will be taken into account when any planning application is considered.</p>	
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The Parish Plan also expresses support for some additional housing development in the village:

"Support proposals (subject to compliance with planning regulations and the Village Design Statement) to build up to 10 small private houses over 10 years, affordable to first time buyers and people wishing to downsize, primarily through infilling."

SP3 (Settlement Hierarchy) – Brimpton, where our client's land interest is situated, is classified as one of the smaller settlements (rather than a Service Village, Rural Service Centre or Urban Area). As such, any development outside the settlement boundary would be restricted to that allowed or under policy DM1. No allocations appear to be proposed in these settlements, contrary to the requirement in NPPF para 79 to plan for growth of rural villages. Rather, the villages would rely upon a limited number of infill or change of use/ windfall opportunities as allowed for within the settlement boundary under Policy SP1.

The Settlement Hierarchy evidence base document allocated Brimpton 10 points, based on the centre of the village being within 1km of:

- Primary School (3 points)
- Village Hall (3 points)
- Superfast Broadband (1 point)
- Community Transport Scheme (1 point)
- Public House (1 point)
- Place of Worship (1 point).

No recognition of the local sports facilities appears to have been given. Nor any points for being in close proximity (within 10km) of a Major Urban Centre.

The methodology utilised in the Settlement Hierarchy is too heavily focused upon accessibility to public transport – without accounting for modes of active travel (walking, cycling). From Brimpton, it is a 10 minute cycle ride (2.5 - 3km) to Midgham station and thereafter a 17 minute commute by rail to Reading. Alternatively, it is a 10 minute (3km) cycle ride south to Baughurst, where one could leave a bike and take



the bus to Basingstoke (which runs every 15 mins and takes approximately 25 mins to the hospital or 35 mins to Basingstoke railway station/ town centre.

40% of the Brimpton population at present is retired, and may therefore be more reliant on the private car than active travel/ cycling for daily needs; Younger working age residents may be more likely to work at home a portion of the week, and commute to work 2-3 days. The ONS has indicated that 84% of workers who had to work from home during the pandemic said they intended to carry out a mix of home working/ working in the office in future¹. New housing in the village would be attractive to this younger cohort who wish to raise families in a village rather than an urban area – particularly given the presence of a primary school in the village. It is reasonable to assume that such households might have 1-2 occupants travelling to work in Newbury/ Thatcham/ Basingstoke/ Reading 2 or 3 times per week and could comfortably do so via active travel and public transport.

On this basis, we submit that smaller settlements such as Brimpton should be given more priority in the settlement hierarchy, to allow for some small scale development / extension of settlement boundaries so that the village can thrive and grow.

We note that a recent successful proposal for erection of 4 detached dwellings at Washoe Lodge in Brimpton Lane (reference 20/01825/FULD) attracted support from the community. Examples of the positive feedback provided, demonstrating a need for additional housing in the village, include:

"I think this is a great opportunity for the village, and the local primary school. I have young children myself and would be interested in moving my family to a village location like this, which I can still commute to work easily using the local facilities at Midgham/ Thatcham train stations. There is often little opportunity to buy in this village or similar and having the opportunity to buy on a modern development would be ideal for growing families like myself."

"Nice village, needs more properties for families who commute with some good walks in the local area. Needs more developments with off road parking and garage space as local parking is not great. Would be keen to look at this development in the future once completed."

"Great to see new development coming to Brimpton, I looked to move to this area recently but did not find any suitable new development."

"As a local business owner and resident of Brimpton it is great to see more housing for Brimpton. It's a well located village that seems to be slowly decaying through lack of investment, both the school and village facilities could do with more families in the area to help improve the village."

Two potential allocations were assessed in the HELAA, these being BRIM1 and BRIM2, further north of our client's site. (see figure below).

1

[https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/ishybridworkingheretostay/2022-05-23#:~:text=More%20than%20three%2Dquarters%20\(78,had%20fewer%20distractions%20\(53%25\).](https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/ishybridworkingheretostay/2022-05-23#:~:text=More%20than%20three%2Dquarters%20(78,had%20fewer%20distractions%20(53%25).)

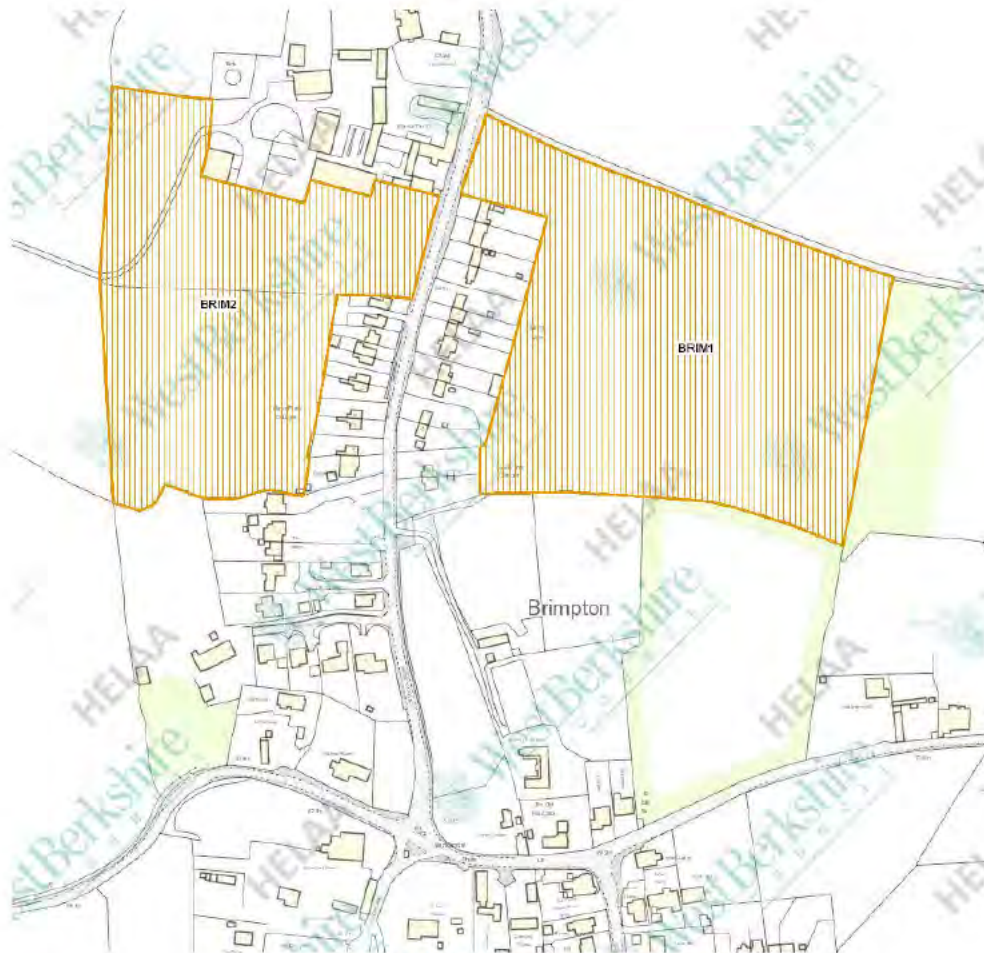


Figure 4 HELAA Sites assessed in Brimpton

Both BRIM1 and BRIM2 were assessed as being adjacent to the settlement, and being greenfield/ agricultural sites available for residential redevelopment. A density of 30dh was considered. The HELAA stage 2b assessment considered whether development of these sites would be appropriate in the context of the existing settlement form, pattern and character of the landscape. For BRIM1 it was noted that “the site is located adjacent to existing linear development on Brimpton Road...some frontage development along Brimpton Road would continue the existing settlement form, however development of the whole site would be inappropriate in the context of the existing settlement form and pattern.” A similar conclusion was reached in respect of BRIM2 – ie that “some frontage development on part of the site” may be acceptable subject to further landscape assessment. For both, the conclusion was that development would be dependent on a review (and realignment) of the settlement boundary. This is because the Stage 2a assessment (development potential) found that Brimpton falls outside the settlement hierarchy and is therefore suitable only for limited infill development within the boundary.

Therefore, the evidence base and early LPR work has shown that:

- There is some Parish Council support for realignment of the settlement boundary to include our client’s site, subject to public consultation and a suitable development proposal. This feedback was provide as part of consultation to the Settlement Boundary review;
- The parish Plan supports proposals for up to 10 additional houses in the village, particularly affordable housing or homes for downsizers;
- The public supported a recent proposal for 4 new homes in the village, demonstrating a need for housing for families and lack of suitable options;



- The HELAA demonstrates that the landscape could accommodate some infill development to the north of the site – a conclusion which must also rationally apply to our client’s site.
- Development on this site would amount to infill, based on the form and arrangement of the settlement. Brimpton Road features linear housing development opposite the site and to the north. This site could accommodate infill development along the road frontage in a manner which is respectful to the form and character of the settlement.

The only reason, it seems, for not allocating any additional housing in Brimpton, or altering the boundary to provide scope for infill, its rating in the Settlement Hierarchy. We have demonstrated above that the site is accessible by active transport to a number of services, facilities and employment centres. The Settlement Hierarchy review is overly focused upon public transport rather than other sustainable modes of transport, such as active travel (cycling and walking).

SP5 (Responding to Climate Change) – the policy is not clearly drafted. Requiring development ‘to contribute to’ carbon neutrality by 2030 is an admirable aim, but the expectations are not clearly set out here. Of key concern is the fact that the detailed requirements of sub clauses a) to m) (setting out carbon neutrality measures) will be expected “depending on the nature and scale of proposals”. The expectation should be set out clearly so that developers know what will be expected of them and can factor this into the development models.

It is difficult to understand how the whole plan viability assessment has assessed the cost implications of policy SP5, when the policy itself does not give any indication what scale or type of development proposal will be subject to it. Our client supports efforts to improve building / energy standards and progress toward carbon neutrality; it simply wishes to ensure the expectations are clear, transparent, and applied equally so there is a level playing field.

SP14 (Sites Allocated for Development in the Eastern Area) – the LPR does not allocate any small sites, less than 1ha, for general residential development in the Eastern Area. Rather, it provides for a 65 bed care home (RSA6) and 8 pitches (RSA24). The NPPF (para 69) emphasises that small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. The LPR should accommodate at least 10% of the housing requirement on sites no larger than 1ha. We submit that it would be sensible to take this approach in *each* of the three spatial areas, including the Eastern Area.

Our client’s site is located directly adjacent to the settlement boundary of Brimpton, is not in the AONB or at risk of flooding. Nor is it within the AWE DEPZ. It is available immediately and could provide small scale housing relatively quickly. Given the LPR’s reliance on large strategic development locations which may take many years to gain planning permission, deliver necessary supporting infrastructure (such as schools) and become available for occupation, we submit that the Council should also allocate our client’s site to boost delivery of small scale housing sites in the immediate short term.

Development Management (“DM”) Policies

Our client wishes to comment on the proposed DM policies as follows:

DM1 (Residential Development in the Countryside) – this policy should be amended to support delivery of self or custom build plots in edge of settlement locations outside settlement boundaries.

The policy allows for infill within settlement boundaries. In the case of our client’s site in Brimpton, development would amount to infill, were it in the boundary. it would not, however, qualify at present



due to the decision not to amend the settlement boundary to follow the nature form of the settlement. We have commented above on the Settlement Boundary review (in relation to Policy SP1).

DM3 (Health and Wellbeing) is supported. We would also suggest including express reference to the health and wellbeing benefits of residents of rural villages being able to stay within their local community as their needs change. Children should be able to buy a home near where they grew up, should they wish, to continue to provide support to their parents as they age. Older residents who are downsizing should have the option of staying in the community where they have social support and connections. Those with particular health/ accessibility needs should be able to commission/ self build a home to suit their needs. Residents should be able to find suitable housing to accommodate their needs without needing to relocate further away from their support network. Development which delivers small scale housing to meet local needs should be supported.

DM18 (Self and Custom Build Housing) is supported, as it is evidence of the Council's recognition of its statutory duty to consider demand for custom and self build housing in plan making. The LPR is required to be informed by housing need assessment which includes the needs of different groups, including those wishing to commission or build their own homes. Based on the latest Governmental data release (May 2022), West Berks Council granted planning permission for 29 serviced plots between 31 Oct 2020 and 30 Oct 2021. Data was not supplied to indicate the level of demand based on the number of people on your registers. This data should be transparent and published regularly. By way of comparison, in neighbouring Basingstoke and Deane there are 328 entries on the register. If demand is similar in West Berks, then delivery is falling woefully short. Therefore, policy which supports delivery of self and custom build is supported. We note however, that this should not rely on delivery as part of large strategic development locations due to the time delays in such plots coming forward. Rather, policy should support delivery of self and custom build on small plots in a limited number settlements. Brimpton is one such location where a small number of sites could be delivered, to meet local demand for custom and self-build in close proximity to facilities such as the local primary school.

Yours faithfully
BELL CORNWELL LLP

[REDACTED]
Associate

DD: [REDACTED]
[REDACTED]

LAND EAST OF BRIMPTON ROAD, BRIMPTON, WEST BERKSHIRE

HERITAGE IMPACT ASSESSMENT

ON BEHALF OF
HATHOR PROPERTY



**Land East of Brimpton Road,
Brimpton,
West Berkshire**

NGR: SU 5581 6490

**Report No. 1555
February 2023**



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GLOSSARY OF TERMS AND ABBREVIATIONS

Archaeology

For the purposes of this project archaeology is taken to mean the study of past human societies through their material remains from prehistoric times through to the modern era. No rigid upper date limit has been set, but AD 1900 is used as a general cut off point.

CAAMP

Conservation Area Appraisal and Management Plan

HER

Historic Environment Record.

HVIA

Heritage and Visual Impact Assessment.

ICOMOS

International Council on Monuments and Sites.

LVIA

Landscape and Visual Impact Assessment.

Modern

There is debate in archaeology about when the modern period commences, but 1900 is a useful start point.

Medieval

The period between the Norman Conquest (AD 1066) and c. AD 1500.

Natural

In archaeological terms this refers to the undisturbed natural geology of a site.

NGR

National Grid Reference from the Ordnance Survey Grid.

NMP

National Mapping Programme whereby possible archaeological features present on aerial photographs were mapped. Undertaken for certain counties, including Cornwall.

OD

Ordnance Datum; used to express a given height above sea level.

OS

Ordnance Survey.

OUV

Outstanding Universal Value.

Post-Medieval

Refers to the period from c. AD 1500 to AD 1900.

Prehistoric

In Britain this term is generally used for any of the traditionally defined periods such as Palaeolithic (c. 480,000-12,000 BC), Mesolithic (c. 12,000-4000 BC), Neolithic (c. 4,000-2,500), Bronze Age (c. 2500-600 BC) and Iron Age (c. 800 BC – AD 43).

Romano-British

Term used to describe the fusion of indigenous late Iron Age traditions with the invasive Roman culture. Traditionally dated between AD 43 and AD 410.

Saxon or Early Medieval

Term used to describe the period between the end of Roman Britain c. AD 410 and the Norman Conquest (AD 1066).

VCH

Victoria County Histories.

WHS

World Heritage Site.

ZTV

Zone of Theoretical Visibility.

SUMMARY

This proportionate Heritage Impact Assessment has been prepared by Diana King and team of Foundations Heritage to accompany a planning application in relation to a proposed small housing development on land to the east of Brimpton Road, Brimpton, Newbury, West Berkshire. The report has considered the potential for the proposals to affect known and potential heritage assets, as required by the National Planning Policy Framework 2021.

The report has identified that the proposed works have the potential to affect buried archaeological deposits but that the potential for such deposits is considered low for all periods except the Post-medieval period. The presence of Prehistoric finds, Roman settlement remains associated with a possible hypocaust in the vicinity of the site and Saxon settlement remains cannot be ruled out but are assessed as unlikely on the basis of current evidence. The site has been largely undeveloped other than known post-medieval buildings, therefore any existing remains could be well-preserved.

Potential harm to the setting of listed buildings and non-designated heritage assets has been assessed as **neutral** given that the site area does not contribute to their heritage significance. The southern third of the site lies within the Conservation Area, however, this part of the conservation area has been assessed in this report as having no special historical or architectural interest; indeed, it is recommended that it be removed from the Conservation Area. The unmitigated potential harm of the proposals to the setting of the Conservation Area has been assessed as **negligible adverse**. It is possible this could be reduced to a **neutral** effect through design solutions within the development proposals.

Mitigation in the form of archaeological trial trenching may be considered appropriate in advance of any groundworks. The sensitive design of the proposals will also be key to reducing potential adverse effects to a minimum or to entirely remove them.

It is ultimately at the discretion of the Local Authority decision-maker as to whether harm exists that could trigger paragraph 202 of the NPPF (2021), which requires that harm should be weighed against public benefit. It is the opinion of this report, however, that the proposals, suitably mitigated, are not at sufficient variance with current policy and guidance to preclude development on the site.

1 INTRODUCTION AND PROJECT BACKGROUND

Purpose of the report

- 1.1 This proportionate Heritage Impact Assessment has been prepared by Foundations Heritage to accompany a planning application in relation to a proposed housing development on land to the east of Brimpton Road, Brimpton, Newbury, West Berkshire (NGR: SU 5581 6490, Figure 1). The project was commissioned by Fred Schiff of Hathor Property Ltd.
- 1.2 This report has been written by Diana King BA, MCIfA who has over 20 years' experience in heritage matters with particular regard to the preparation of archaeological and heritage statements/impact assessment and archaeological building recording. The site walkover was undertaken by Andrew Hood (BSc, MCIfA), the Aerial Photographic Analysis by Tracy Michaels (BSc, MCIfA), the mapping and HER by Hannah Burke (MA, ACIfA) and edited by Roy King (BA, MCIfA).
- 1.3 This report presents an assessment of the predicted effects on the significance of heritage assets which could be caused by the proposed development.
- 1.4 Potential harm could arise from an impact on below-ground archaeological deposits and through an alteration to setting in regard to Brimpton Conservation Area, three grade II listed buildings, the War Memorial, St Peter's Church and Elment House and the two non-designated heritage assets, namely Forge Cottage and the Former Forge Stores.
- 1.5 This Assessment has been prepared in accordance with the requirements of the National Planning Policy Framework 2021, the West Berkshire Council Core Strategy Development Plan Document 2012 and relevant standards and guidance.
- 1.6 A heritage asset is defined in the National Planning Policy Framework (Annex 2) as '*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)*'.
- 1.7 Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields and conservation areas. Non-designated heritage assets include sites held on the County Historic Environment Record, elements of the historic landscape and sites where there is the potential to encounter unrecorded archaeological remains, and above ground assets such as buildings of local significance (locally listed).

Site Description

- 1.8 The site comprises a field on the east side of Brimpton Road, immediately north of the historic core of Brimpton village.

Proposed development

- 1.9 The proposed development comprises a small housing development of up to seven dwellings with associated infrastructure. No details of the proposals are yet available.

Limitations

- 1.10 The assessment assumes that data provided by third parties represents an accurate and full representation of the known resource.

2 LEGISLATION, POLICY AND GUIDANCE

Introduction

- 2.1 In considering a development proposal, the Local Planning Authority (LPA) will consider the policy framework set by government guidance and their own Local Development Framework. Planning decisions relating to designated heritage assets must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Ancient Monuments and Archaeological Areas Act 1979, and relevant policies within the National Planning Policy Framework.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 2.2 The Planning (Listed Buildings and Conservation Areas) Act sets out the criteria for listing buildings deemed by the Secretary of State to be of special architectural and historic interest and the designation by Local Authorities of Conservation Areas, and how these assets should be treated in the planning process. The appropriate consideration of these assets within the planning process is reflected in the provisions of NPPF.
- 2.3 Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that *"in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or Secretary of State should pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*.
- 2.4 Section 69 of the Act requires local authorities to define as conservation areas any *"areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance"*. Section 72 gives local authorities a general duty to pay special attention *"to the desirability of preserving or enhancing the character or appearance of that area"*.

Ancient Monuments and Archaeological Areas Act 1979

- 2.5 The Ancient Monuments and Archaeological Areas Act of 1979 provides for the investigation, preservation and recording of matters of archaeological or historical interest. This relates not only to Scheduled Ancient Monuments but also to other monuments which in the opinion of the Secretary of State is of public interest by reason of its historic, architectural, traditional, artistic or archaeological interest. Section 61(12) defines sites that warrant protection due to their national importance.

National Planning Policy Framework

- 2.6 The National Planning Policy Framework was published in July 2021 replacing the earlier version (2019) as part of the Government's streamlining of the planning process.

General

- 2.7 NPPF paragraph 11 states that *"Plans and Decisions should apply a presumption in favour of sustainable development.*

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁷".

- 2.8 Footnote 7 states *"the policies referred to are those in this Framework (rather than those in development plans) relating to.....designated heritage assets and other heritage assets of archaeological interest referred to in footnote 68...."*. Footnote 68 states *"Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets"*.

- 2.9 Government policy in relation to the historic environment is outlined in Section 16 of the National Planning Policy Framework (NPPF) entitled *Conserving and Enhancing the Historic Environment* (MHCLG 2021). Paragraphs 189-208 provide guidance for planning authorities, property owners, developers and others regarding the treatment of heritage assets in the planning process and specific paragraphs which are relevant to this assessment are summarised below.

- 2.10 Paragraph 189 states that *"heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations"*.

- 2.11 Paragraph 190 states that: *"plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:*

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

- c) *the desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) *opportunities to draw on the contribution made by the historic environment to the character of a place”.*
- 2.12 Paragraph 191 states that: *“when considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest”.*
- 2.13 Paragraph 192 states that: *“local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*
 - a) *assess the significance of heritage assets and the contribution they make to their environment; and*
 - b) *predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future”.*
- 2.14 Paragraph 193 states that: *“local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible”.*
- 2.15 Paragraphs 194-198 relate to proposals affecting heritage assets.
- 2.16 Paragraph 194 addresses planning applications stating that: *“in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”*
- 2.17 Paragraph 195 states that *“local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”*
- 2.18 Paragraph 196 states: *“where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision”.*
- 2.19 Paragraph 197 states that: *“in determining applications, local planning authorities should take account of:*

- a) *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) *the desirability of new development making a positive contribution to local character and distinctiveness”.*
- 2.20 Paragraph 198 states that: *“in considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal”.*
- 2.21 Paragraphs 199-208 consider potential impacts.
- 2.22 Paragraph 199 states that: *“when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance”.*
- 2.23 Paragraph 200 states that *“any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
- a) *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
 - b) *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional”.*
- 2.24 Paragraph 201 states that *“where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a) *the nature of the heritage asset prevents all reasonable uses of the site; and*
 - b) *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
 - c) *conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
 - d) *the harm or loss is outweighed by the benefit of bringing the site back into use.”*

- 2.25 Paragraph 202 states that: *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use"*.
- 2.26 Paragraph 203 states that: *"the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.
- 2.27 Paragraph 204 states that: *"local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred"*.
- 2.28 Paragraph 205 states that: *"local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted"*.
- 2.29 Paragraph 206 states that: *"local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably"*.
- 2.30 Paragraph 207 states that: *"not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole"*.
- 2.31 Paragraph 208 states that: *"local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies, but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies"*.
- 2.32 The above paragraphs make it clear that the effects that proposed developments have on the significance of heritage assets should be assessed within planning applications.
- 2.33 Paragraph 20 of the accompanying Planning Practice Guidance outlines what is meant by public benefits namely: *"public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits"* (MHCLG 2019).

- 2.34 The key test in NPPF is whether a proposed development will result in substantial harm or less than substantial harm to a designated asset. Substantial harm is not defined in the NPPF although paragraph 18 of the accompanying Planning Practice Guidance provides guidance and states *“what matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting (MHCLG 2019).”* A balanced judgement weighing harm against significance is required in regard to non-designated assets.

Local Planning Policy

- 2.35 The Local Authority responsible for planning policy is West Berkshire District Council. The Council is currently working on a new Local Plan as part of the Local Development Framework, which has yet to be completed. Heritage matters are currently dealt with as a Core Policy in the Core Strategy Development Plan Document, adopted on 16 July 2017, which contains Policy CS19 Historic Environment and Landscape Character. It states:
- 2.36 *In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:*
- a) The sensitivity of the area to change.*
 - b) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.*
 - c) The conservation and, where appropriate, enhancement of heritage assets and their settings (including those designations identified in Box 1).*
 - d) Accessibility to and participation in the historic environment by the local community.*
- 2.37 *Proposals for development should be informed by and respond to:*
- a) The distinctive character areas and key characteristics identified in relevant landscape character assessments including Historic Landscape Characterisation for West Berkshire and Historic Environment Character Zoning for West Berkshire.*
 - b) Features identified in various settlement character studies including Quality Design – West Berkshire Supplementary Planning Document, the Newbury Historic Character Study, Conservation Area Appraisals and community planning documents which have been adopted by the Council such as Parish Plans and Town and Village Design Statements.*
 - c) The nature of and the potential for heritage assets identified through the Historic Environment Record for West Berkshire and the extent of their significance.*
- 2.38 There is no adopted Neighbourhood Plan or Village Design Statement for Brimpton.

- 2.39 A Historic Environment Action Plan (HEAP) was drawn up for West Berkshire in 2011 and is currently being reviewed and revised. The HEAP sets out strategic aims and vision for the County but does not include any specific policies relevant to this study.

Guidance

- 2.40 Specific heritage guidance includes the Chartered Institute for Archaeologist's *Standard and Guidance for Historic Environment Desk Based Assessments* (2017); *The Principles of Cultural Heritage Impact Assessment in the UK* (July 2021) collated by IEMA, ClfA and IHBC; Historic England guidance in the form of *Conservation Principles: Policies and Guidance: for the sustainable management of the historic environment* (2008), *Managing Significance in Decision-Taking in the Historic Environment*, *Historic Environment Good Practice Advice in Planning: 2* (2015), *Preserving Archaeological Remains: Decision-taking for Sites Under Development* (2015), *The Setting of Heritage Assets*, *Historic Environment Good Practice Advice in Planning: 3* (2017), *Advice Note 2: Making Changes to Heritage Assets* (2018) and *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019); finally, the Heritage Statement also utilised guidance set out by the Highways Agency in *Sections LV106 and LV107 of Design Manual for Road and Bridges* (2020) and *Guidance on Heritage Impact Assessment for Cultural World Heritage Sites* (2011) by ICOMOS as the basis for tabulated data.

3 ASSESSMENT METHODOLOGY

Introduction

- 3.1 This proportionate heritage statement comprises a desktop study of the effects of the proposed development on known and potential heritage assets in accordance with the in-house Written Scheme of Investigation (2022). It also forms the basis for any further works, which may be required to mitigate any adverse effects of the proposals on the significance of designated heritage assets around the site. The report will allow all parties associated with the project to consider the need for design mitigation to counteract the potential effects and to ensure compliance with national and local heritage planning policies.
- 3.2 Given the nature of heritage assets, this assessment process involves a degree of subjective interpretation based on existing data sources and professional judgement. This is particularly the case when assessing the potential presence and likely significance of buried archaeological deposits that may be present within a site. The assessment of the significance of heritage assets and the impact of the proposed development on that significance involves a degree of interpretation and professional judgement because different elements of a heritage asset or its setting contribute differentially to its significance. How the significance of a heritage asset is likely to be affected by a set of development proposals will be contingent upon the nature of those proposals and professional judgement is required in order to gauge likely effects.
- 3.3 In assessing the significance of the site and heritage assets, the criteria specified in Tables 3.1-3.3 were used to provide a framework although it is the position of Foundations Heritage that tabulated data lacks the flexibility required to accurately

assess heritage assets and these tables are therefore subject to professional judgement. The tables are based upon DMRB (2020) and ICOMOS (2011), which constitute the most widely accepted form of tabulated data.

Definition of significance

- 3.4 In accordance with the NPPF, this report aims to assess the effects of the proposed development on the significance of heritage assets. Significance' is defined in the NPPF (Annex 2) as *"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."*

Establishing significance

- 3.5 The significance of above ground heritage is derived from the DCMS criteria for listing and the guidance offered in NPPF. According to DCMS criteria, buildings are listed because they are of "special" architectural or historical interest and that this warrants their preservation. Grade I and Grade II* Listed Buildings are of the highest significance because they are of exceptional interest (Grade I) or are more than of special interest (Grade II*). Grade II Listed Buildings are of special interest. Assets, which are not statutorily designated, but are documented in the Local Authority Historic Environment Record or on a Local List, are nevertheless still of heritage interest.
- 3.6 Assessing the impact of the development proposals on the significance of heritage assets employs a two-step process:
- Identification of the importance of known and potential heritage features; and
 - Identification of the magnitude of the effect.
- 3.7 Historic England guidance for establishing the significance or value of heritage assets was previously based on four criteria provided by Historic England in *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* (EH 2008). These criteria were evidential, historical, aesthetic and communal.
- 3.8 The values used to establish the significance of heritage assets have been replaced by archaeological, architectural & artistic and historic in the NPPF Glossary and in the consultation draft of *Conservation principles for the sustainable management of the historic environment* (2017), which will replace the 2008 document in due course. These values are also utilised in the Historic England Publication *Statements of Heritage Significance: Analysing Significance in Heritage Assets* (2019) and are detailed below:
- Archaeological Interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
 - Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and

decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.

- **Historic Interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

3.9 For the purposes of this assessment the combined evidential, historical, aesthetic and communal values of identified heritage assets result in an overall heritage significance rating as demonstrated in Table 3.1 below:

Table 3.1 Significance Ratings

Value/Significance	Descriptors		
	Archaeological Remains	Historic Buildings	Historic Landscapes/Areas
Very High	World Heritage Sites. Assets that are of acknowledged international importance.	Structures that are inscribed as World Heritage Sites. Other buildings of recognised international importance.	World Heritage Sites inscribed for their historic landscape qualities. Historic landscapes of international importance, whether designated or not. Extremely well-preserved historic landscapes with exceptional coherence, time depth or other critical factor(s).
High	Scheduled Monuments. Undesignated assets of schedulable quality and importance.	Listed Buildings	Registered historic landscapes. Registered battlefields. Registered Parks and Gardens
Medium	Local authority designated sites. Non-designated sites or other assets of regional importance.	Conservation Areas Non-designated buildings that may be of listable quality.	Unregistered historic landscapes that might be of sufficient quality to allow designation. Unregistered historic landscapes with moderate preservation and time depth.
Low	Non-designated assets of local importance.	Historic buildings on 'local list'.	Unregistered historic landscapes with interest to local groups.

	Non-designated sites or assets with low coherence and poor preservation.		Unregistered historic landscapes of poor coherence or preservation.
Negligible	Non-designated assets with very little surviving coherence and very poor preservation.	Historic buildings that do not qualify for the local list but retain some heritage significance	Unregistered historic landscapes of very poor coherence or preservation, so as to be all but unrecognisable.
Unknown	Non-designated assets that have not been adequately assessed.	Buildings with possible, but inaccessible historic interest.	Unassessed landscapes with possible heritage significance.

- 3.10 Having determined the significance of any known or potential heritage asset, the assessment of likely potential and effects of the development upon heritage assets can be undertaken using the following five-level scale of significance as a guidance. Effects can either be [beneficial](#) or [adverse](#), see Table 3.2.

Table 3.2: Table of Impacts Criteria

Impact	Archaeological Resource	Historic Buildings	Landscape and Settings
Minor Beneficial	A change in land use or management to enhance the preservation of the identified archaeological resource.	The historic fabric of the building is slightly enhanced to restore original features or patterns of circulation.	The setting of any asset is slightly enhanced.
Neutral	No effects on known or predicted archaeological resources or their settings. No mitigation required.	No change to historic building elements.	No change to key historic landscape elements, parcels or components. No effect on the setting of any asset.
Negligible	No effects on known or predicted archaeological resources or their settings. Mitigation protects the resource from adverse effects.	Slight change to historic building elements that hardly affect it.	Very minor changes to key historic landscape elements, parcels or components; virtually unchanged visual effects. No meaningful effect on the setting of any asset.
Minor Adverse	Effects small areas of known or potential resources at a local level or where the archaeological resource is very truncated or fragmented. The removal of the resource would not affect future investigation and would increase archaeological knowledge.	Change to key historic building elements, such that the asset is slightly different.	Change to few historic landscape elements, parcels or components; slight visual changes to a few key aspects of historic landscape and the settings of any asset.
Moderate Adverse	Adverse effects would occur on archaeological resources at a local level by ground work that would have a detrimental impact on	Changes to many key historic building elements, such that the resource is significantly modified.	Change to some key historic landscape elements, parcels or visual components; visual change to key

	archaeological deposits but would leave some of the resource <i>in situ</i> .		aspects of the historic landscape; resulting in moderate changes to historic landscape character and the setting of any asset.
Major Adverse	Adverse effects caused to areas of high archaeological potential, Archaeological Priority Areas, Scheduled Monuments and to other archaeological sites of importance in breach of relevant planning policies, or where the level of impact would result in total destruction.	Change to key historic building elements such that the resource is totally altered.	Change to most or all key historic landscape elements, parcels or components; extreme visual effects resulting in complete change to historic landscape character and the setting of any asset.

Table 3.3 Significance of Effects Matrix

Value/Significance		Very High	Neutral	Low	Moderate/ Major	Major	Major
		High	Neutral	Low	Low /Moderate	Moderate/ Major	Major
		Medium	Neutral	Neutral/ Low	Low	Moderate	Moderate/ Major
		Low	Neutral	Neutral/ Low	Neutral/ Low	Low	Low / Moderate
		Negligible	Neutral	Neutral	Neutral/ Low	Neutral/ Low	Low
			No Change	Negligible	Low	Moderate	Major
Magnitude of Impact							

- 3.11 For built heritage, the conservation and restoration of building can have **moderate** or **substantial beneficial** effects, but redevelopment of buildings for uses for which they were not originally intended, limits any beneficial effects.
- 3.12 NPPF (2021) identifies only three classes of harm to the heritage value of designated assets, which are "substantial", "less than substantial" and "no harm". No guidance is offered in the NPPF as to the threshold between the two. However, in the case of *Bedford Borough Council v. the Secretary of State for Communities and Local Government and NUON UK Ltd [2012] (EWHC 4344 (admin) CD5.11)*, the High Court supported a Planning Inspectorate finding that for harm to be **substantial**, the impact on the significance of a designated heritage asset must be so serious that very much, if not all, of that significance is drained away. This ruling provides a useful benchmark for assessing impacts and has contributed to compile Table 3.2. The International Council on Monuments and Sites (ICOMOS) has produced a similar scheme in which substantial impacts affect assets to such a degree that they are 'totally altered'.

Effects on significance brought about by a change in setting

- 3.13 Setting is defined in the NPPF (Annex 2) as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'* Historic England guidance (2017) further notes that *all heritage assets have a setting irrespective of whatever form they survive and whether they are designated or not.* It also notes that the availability of access is not a contributor to significance; for example, quiet and tranquillity may be an attribute of the setting. It is important to clarify, however, that settings have no intrinsic value in themselves and are only relevant in the way they contribute to the significance of a heritage asset.
- 3.14 The setting of a heritage asset includes its physical surroundings (e.g. topography, aspect, definition and scale, historic materials, green space, openness/enclosure, functional relationships and history of change over time) and experience (e.g. landscape character, views, intentional inter-visibility with other assets, noise or other nuisances, tranquillity, odours, sense of enclosure, accessibility, land use, degree of interpretation, rarity of comparable settings, cultural associations and traditions).
- 3.15 However, the visual aspect of a setting will often be the most prominent and easiest element of setting to recognise and appreciate. Historic England guidance defines views as *"a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset"*. Visibility does not, in itself, necessarily affect significance and it is possible for a development to be sited immediately adjacent to an asset and in full view without affecting its setting. Conversely a development does not need to be visible at all to affect significance.
- 3.16 Buried heritage assets also require some assessment; despite the fact that such features may retain no obvious legibility or ability to be appreciated by a non-professional. The 2017 guidance notes, however, that such assets retain a presence in the landscape and *"may have a setting"*.
- 3.17 A number of other considerations need to be recognised. For example, the settings of heritage assets which closely resemble the setting at the time that the asset was constructed or formed are likely to contribute particularly strongly to significance (HE 2017). Cumulative change is also examined in order to consider whether additional change will further detract from the significance of any heritage asset.
- 3.18 The process of assessment also needs to take account of the fact that setting does not equate to general amenity. HE guidance notes that *views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.*
- 3.19 This guidance states that the importance of setting *'lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance'*. It goes on to note that *"all heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by*

development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it."

3.20 Furthermore, the guidance states that 'protection of the asset need not prevent change' and changes to setting are accepted as being part of the evolution of landscapes and environments. A High Court decision in (The Queen) vs Sevenoaks DC [2014] EWHC 1895 (Admin) states that 'preserving'; for both Listed Buildings and Conservation Areas means doing 'no harm'; rather than 'no change'.

3.21 On a practical level, the Historic England guidance identifies an approach which is based on a five-step procedure as follows:

Step 1: identify which heritage assets and their settings are affected. This has been achieved through both desk-based assessment and a walkover of the Site and its environs.

Step 2: assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. As far as this step is concerned the guidance makes the following observations: *"the second stage of any analysis is to assess whether the setting of a heritage asset makes a contribution to its significance and the extent and/or nature of that contribution"* and goes on to state that *"this assessment should first address the key attributes of the heritage asset itself and then consider*

- *the physical surroundings of the asset, including its relationship with other heritage assets;*
- *the asset's intangible associations with its surroundings, and patterns of use*
- *the contribution made by noises, smells, etc. to significance, and*
- *the way views allow the significance of the asset to be appreciated".*

Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance or the ability to appreciate it. In respect of this step the guidance notes that *'the assessment should address the attributes of the proposed development in terms of its:*

- *location and siting;*
- *form and appearance;*
- *wider effects; and*
- *permanence".*

Step 4: explore ways of maximising enhancement and avoid or minimise harm.

Step 5: make and document the decision and monitor outcomes.

3.22 No guidance is given in NPPF or the practice guide as to how to assess levels of harm to non-designated assets, only that a balanced judgement must be made weighing harm against significance.

4 SOURCES

- 4.1 Information relating to Scheduled Monuments, Listed Buildings, Registered Parks and Gardens and Registered Battlefields was acquired from Historic England and assessed for a 1km radius around the site. Information with regard to HER information was acquired from West Berkshire Historic Environment Record (HER). Conservation Area information has been acquired from West Berkshire Council.
- 4.2 Regional and national journals, where available/relevant, have been examined for relevant information, as well as unpublished reports of previous archaeological activity within the region, as appropriate.
- 4.3 Appropriate online resources, such as, the DEFRA MAGIC website and the British Geological Viewer, were consulted.

5 SITE WALKOVER SURVEY AND SITE DESCRIPTION

- 5.1 A site walkover was conducted on 24th May 2022 by Andrew Hood BSc MCIfA of Foundations Archaeology.
- 5.2 The study area is situated to the north of the centre of Brimpton. It is bounded to the west by Brimpton Road and to the south, east and north by residential dwellings, with associated grounds. The site comprises a linear plot of land, which measures approximately 0.5ha.
- 5.2 The site is situated at approximately 80m aOD, on ground that slopes downwards from south to north. The underlying geology is recorded as *London Clay Formation* - clay, silt and sand (British Geological Survey Online Viewer).
- 5.3 At the time of the walkover, the site consisted of an area of overgrown grass, with frequent weeds and brambles (Photograph 1). The west site perimeter consisted of a substantial hedge, with an access gate, whilst the south, east and north perimeters were defined by a mixture of low wooden fencing, some of which was broken, along with some hedges and/or trees.
- 5.4 The greater part of the site contained a BMX-style bicycle stunt track, which comprised a network of earth-built gullies, hollows, banks and ramps, as well as wooden platforms (Photographs 4-6 and 8). Although extensive in area, the construction of the stunt track appeared to have caused only superficial disturbance to the topsoil.
- 5.5 No archaeological features or artefacts were observed during the walkover survey.

6 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

- 6.1 The purpose of this section of the report is to provide background information to place the site in its broader landscape and historical contexts. It is not meant to provide a comprehensive discussion of the historic landscape within and around the site, but to provide sufficient information to allow the significance of any heritage assets, likely to be affected by the proposed development, to be described, as stipulated in paragraph

194 of the NPPF. Data was collected from the West Berkshire HER within a 500m search radius in accordance with the agreed WSI. An extract of the Historic Environment Record is attached as Appendix 1 and is shown on Figure 2.

6.2 Historic Landscape Character

- 6.2.1 The southern boundary of the site lies approximately 70m to the north of the historic town of Brimpton, within an Historic Landscape Characterisation (HLC) of 'paddocks'. The site is gently sloped between 75m to 80m aOD, descending to the southeast towards the river Enborne approximately 788m to the southeast. The river Kennet runs 890m to the north. The site is under turf with some low-lying vegetation, bordered by trees and hedgerows. The southern half of the site is contained within Brimpton Conservation Area (DWB2355). An HLC of 'historic settlement' has been designated just beyond the southern borders of the site to cover historic Brimpton. The Western side of Brimpton road and the northern border of the site is designated with an HLC of 'recent settlement growth'. To the northeast is a HLC of 'reorganised fields'. To the east of site is an HLC of 'pre-18thC irregular fields'.

6.3 Evidence for Prehistoric activity

- 6.3.1 The Prehistoric entries within the search area comprise six findspots, five of which relate to prehistoric flint tools and associated flakes and cores (11555;11146;11517; and 14716). Flint cores, flakes and associated waste (MWB11551) were found during fieldwalking at Brimpton Manor Farm (MWB1513), along with a sherd of late Bronze Age pottery (MWB14621), approximately 391m northeast of the site. All other finds were flints found during fieldwalking at various locations within the search area, namely: a flint in a field east of Manor View (MWB11555) 205m northeast of the site; a flint north of Bannister's (MWB11146) 300m southeast of the site; a flint and scraper west of Brimpton (MWB11517) 426m southwest of the site; and a flint core and flakes at Holdaway's Farm (MWB14716) 395m west southwest of the site.
- 6.3.2 Between 2013-2015 a predictive model was developed for the Middle Kennet Valley (EWB1808), covering the search area. It aimed to produce a model to predict the potential locations of Late Upper Palaeolithic and Mesolithic archaeology in the Middle Kennet Valley. The project produced a database of all known Upper Palaeolithic and Mesolithic archaeology, lithology and palaeoenvironmental data in the Study Area, and a general predictive sedimentary model from that database. Of the entire HER search area, only the south-eastern outer edges of the search area produced medium to high potential for Upper Palaeolithic and Mesolithic potential, the closest being 507m south-southeast of the site.

6.4 Evidence for Roman period activity

- 6.4.1 Three monuments and one findspot have been identified as from the Roman period within the search area. Roman pottery was found while fieldwalking at Brimpton Manor Farm (MWB11554) 398m northeast of the site. A Roman 'hypocaust' is noted on OS maps (1911 and 1932 editions) (MWB3691, Figure 3.8-9), approximately 26m west of the site. Associated with this entry is a conjectured Roman villa or building, with reports of Roman material being used from this same location in the construction of Brimpton church. Several intrusive events have taken place in the vicinity of this possible hypocaust ahead of development. An evaluation took place 12m to the south of this location and did not find any Roman archaeology, but rather material culture of

Medieval and Post-Medieval date was revealed (EWB1049). An archaeological evaluation was undertaken at Blandford Hythe, Brimpton Road, Brimpton (EWB535) approximately 7m west of the site, on the western side of Brimpton Road in 2002. The evaluation was preceded by a geophysical survey (EWB534) which revealed no potential for archaeology. Due to the proximity of the site to a possible Roman hypocaust (MWB3691), six evaluation trenches were requested prior to the construction of four new homes. No archaeological finds or features were recovered. Similarly, a watching brief was undertaken at Warren House, Crookham Common Road, Brimpton (EWB905) due to proximity to the possible hypocaust (MWB3691). No archaeological features from the Roman period were found, however an undated cylindrical red brick well shaft and late Post Medieval deposits were revealed.

6.4.3 Artefact evidence for a possible Roman villa (MWB3690), approximately 199m southwest of the site, is recorded within the grounds of the Brimpton St Peter's Church, with references to a flue tile found in the 19th century, during church alterations. It is noted that there could be some confusion between this record and a Roman flue tile found in relation to the aforementioned monument (MWB361), some 100m north of the church, which was donated by the Vicar to the Newbury Museum in 1958.

6.4.4 A possible Roman settlement has been identified by aerial photography as cropmarks showing linear features and pits (MWB17871), approximately 376m northwest of the site.

6.5 Evidence for Early Medieval activity

6.5.1 The earliest mention of Brimpton is an AD 944 entry in the charter *Cartularium Saxonicum*, which describes a 'Bryning Tun' being granted to an Ordulf (MWB5289), approximately 151m southwest of the site. The HER note associated with this record links this documentary evidence to the 1815 enclosure map (Figure 3.2) which records a 'Burgh Field' to the southwest of the church, an area of high ground with high visibility of the surrounding lands, suggesting that this could possibly be the location of the Saxon village.

6.6 Evidence for Medieval activity

6.6.1 Medieval Activity is present in the search radius, in the form of the village of Brimpton itself (two entries), Brimpton Manor Farm and associated Moat, Manor Farm, two buildings, a landscape, and a findspot. The Medieval village of Brimpton (MWB5288; MWB5290), approximately 154m southwest of the site, is listed in the Domesday Book in 1086 as consisting of 25 households "putting it in the largest 40% of settlements recorded in Domesday" (Morgan, P (ed), *Domesday Book*, 1979), with Robert son of Gerald and Ralph of Mortimer listed as owners of the lands. The village, listed as 'Brintone' in the Domesday Book, is also named as Brimiton (1177), Brunton (1205) and Brompton (1284).

6.6.2 Brimpton Manor Farm (MWB1513; MWB17426; EWB1005) 283m north of the site is the site of a former Medieval manor and associated moat (MWB1514) which is still extant as an earthwork, and chapel of St Leonard (MWB1515, 1303413, 1005378). The farm and earthwork are shown on the 1815 enclosure map (Figure 3.2). The chapel of St Leonard (MWB1515, SM 1303413, NHLE 1005378), approximately 303m north of the site, is Medieval in origin with later additions and alterations continuing until the 17th century. It is Grade II* listed and a Scheduled Monument (1005378); it is

currently used as a barn. A watching brief (EWB594) on drainage works at the western end of the chapel revealed no archaeological features.

6.6.3 St Peter's Church (MWB5291, 1117302) and surrounding churchyard (MWB22635), both located approximately 132m southwest of the site within the Brimpton Conservation Area, are Medieval in origin with extensive later Post-Medieval additions. The Rocque Map of 1761 shows the extant St Peter's Church with seven buildings east of the church and west of Brimpton Lane. St Peter's Church is Grade II listed with a tower dated to 1748, however the remainder of the building was largely rebuilt in the 19th century. As discussed previously, there is the possibility that some extant Roman material was used in the rebuilding of the church (MWB361). The churchyard originated in the 11th century and was extended to the south in the 20th century, as seen in the 1911 OS map.

6.6.4 During the Lower Kennet Valley Survey (EWB285), some Medieval pottery (MWB11149) was found during fieldwalking, approximately 768m south of the site.

6.7 Evidence for Post-Medieval and modern activity

6.7.1 Records on the HER relating to this period include seventeen buildings and five monuments. Of the seventeen buildings, seven are on the National Heritage List for England (NHLE), all as Grade II. The remaining ten buildings are unlisted. The earliest map of Brimpton is the Rocque map from 1761, followed by successive maps through the Post-Medieval to modern period (Figure 3).

6.7.2 The site area underwent some change in terms of its usage in the early Post-Medieval period, namely from occupied to unoccupied, primarily seen in the map regressions available for the site (Figure 3). The earliest plan consulted is the Rocque Map of 1761 which shows two plots with a building on each within the approximate location of the site. The scale and accuracy of the Rocque map is less certain than later maps, however it is likely that some occupation of the site is evident in the Post-Medieval period. An Ordnance Survey drawing of Kingsclere published in 1808 is the next available historical plan of Brimpton and surrounds. Only one building within the south of the site boundary along Brimpton Road is shown on this map, indicating a change in the use of the site to partly occupied. The 1815 Brimpton Enclosure Map notes that the site area was owned by a Richard Arundell and is a plot that extends somewhat beyond the southern border of the site. There are no longer any buildings recorded on the plot or within the site area.

6.7.3 The Tithe Apportionments map of 1839 shows little change to the site and surrounding buildings from 1815. The site area is entirely comprised of plot 107, the same size as the 1808 plot, owned by a Joseph Arundel and named 'Blacksmith Meadow'. The 1887/1880 Ordnance Survey map shows the site area within plot 55, with the uninhabited plot continuing a short distance to the south. This is identical to the 1839 map plot 107 and that shown in the 1815 map.

6.7.4 The 1900 and 1911 OS maps show no change in land-use of the site. The 1932 OS map shows that the plot within which the site is located has been split into two lots to the south of the site area, however it is still unoccupied land. Similarly, the 1969/70 OS map shows that the plot segregation at the southern end of the site has again altered slightly, with the site area still unoccupied.

- 6.7.5 The 1971 Ordnance Survey map shows the prior plot divisions within the site area dissolved, and the original plot size is retained. This same plot size is continued on each successive map up to the 2021 map. The site remains undeveloped.
- 6.7.6 The western side of Brimpton Road opposite the site remains largely unoccupied until housing development begins to increase in the mid to late 20th century. To the north and northeast of site the arable lands are owned primarily by the Earl of Falmouth (apart from Brimpton Farm, discussed separately) in the early to mid-19th century (Figures 3.3-3.4), with a small plot of housing developed just north of the site in the early 20th century (Figure 3.8). The mid-20th century sees the addition of more housing along both sides of Brimpton Road to the north, while the lands beyond the roadside remain largely unoccupied to the present. Lands to the east of site remain unoccupied until the late 20th century, when a large building/warehouse and three additional buildings are developed (Figure 3.13-3.14). To the south, southwest and southeast the village of Brimpton undergoes gradual increases in occupation seen in urban creep, with the addition of several buildings on the east side of Brimpton lane in the late 20th century. Several early buildings remain undemolished, although alterations are made, and relevant buildings are mentioned below.
- 6.7.7 Within the Brimpton Conservation Area (of which the southern third of the site is included), are ten monuments, including St Peter's Church and surrounding churchyard (previously discussed), the site of a possible Roman hypocaust and settlement (previously discussed). Post-Medieval and Modern monuments within the Conservation Area include a war memorial, seven buildings and a farm. The Brimpton War Memorial (MWB19883, NHLE 1458970) sits at the crossroads in the centre of Brimpton, 31m south of the site. It is a Grade II listed stone cross commemorating the dead of the First and Second World wars and can be seen on the 1932 OS map onwards at the crossroads in the centre of the village.

Tithe Apportionments 1839

Plot Number	Landowner	Occupier	Fieldname	State of Cultivation
105	Earl of Falmouth	Earl of Falmouth		Paddock
106	Earl of Falmouth	James Rivers	Butchers Piece	
107	Joseph Arundel	Joseph Arundel	Blacksmith Meadow	
108	Earl of Falmouth	John Goddard	Jacks Meadow	
112	Earl of Falmouth	James Rivers		A Close
149	John Goddard	John Goddard		Garden
152	Joseph Arundel	Joseph Arundel		Garden
150	John Goddard	John Goddard		Premises & C

- 6.7.8 The Old Post Office (MWB19290, NHLE 1155280) is an 18th century Grade II listed house and former post office, located 49m southeast of the site. First seen in the 1815 enclosure map, it is only labelled as 'The Old Post Office' in the 1971 OS map, whereas a small square building to the northeast in the same block is labelled as the Post Office in the earlier 1969/70 OS map. Elmet House (formerly Brimpton Villa)

(MWB18939, NHLE 1319532) is a Grade II listed early 19th century Georgian brick villa with Victorian and later extensions, located 76m south of the site. It is depicted on all the available historic mapping, although the quality of the earlier mapping renders detail difficult to discern. Kiln Cottage (MWB18925, NHLE 1319517), located 98m west of the site, is a 16th century Grade II listed timber-framed house seen from the Kingsclere 1808 and 1841 OS map onwards (Figure 3.2,3.5-3.13). It is labelled as 'Kiln Cottage's' on the 1887 OS map. The tithe map of 1841 shows that the plot 1708 to the north of Kiln Cottage is at this time named 'Kiln Meadow', indicating a possible industrial usage of the land. The 1932 Ordnance Survey map shows the addition of four buildings around Kiln Cottage on the western side of Brimpton Road. By the 1969/70 OS map it appears to be one building, named 'Kiln Cottage'.

- 6.7.9 Of note on the 1887/1880 OS map is the existence of a new building, south of plot 107 (now called plot 55) namely Forge Cottage (unlisted, MWB21564) located 22m south of the southern border of the site. This new building is located on what is formerly plot 109 in the 1839 Tithe map, which at that time had two buildings on the corner of Brimpton Road and Crookham Common Road, now demolished. That this building is south of the old 'Blacksmith Meadow' (plot 107 on the 1839 Tithe map) and is the western neighbour of the 'Smithy' (Former Forges Store, unlisted 19th century smithy MWB21563, 41m south of the site) indicates ownership of the site and its southern neighbouring plots by the Blacksmith in the 19th century.

Tithe Apportionments 1841

Plot Number	Landowner	Occupier	Fieldname	State of Cultivation
1706- Parish: Thatcham, Henwick, Colthorp, Awbery Street and Crookham	Joseph Arundel	Joseph Arundel	Kiln Meadow	
1707- Parish: Thatcham, Henwick, Colthorp, Awbery Street and Crookham	Joseph Arundel	William Goodchild		Description: 'Near Brimpton'

- 6.7.10 Brimpton House, Church Lane, Brimpton (formerly Brimpton Farm) (Grade II listed, MWB19289, NHLE 1155276), is a house noted for its use as accommodation for Land Girls during the Second World War, located 53m southwest of the site. A village history notes that it was built in about 1812 by a tenant farmer of the local landowner (the Earl of Falmouth), although there are several buildings within this area which could be the property on the 1808 Kingsclere map. The farm (19th century, still partially extant and with its own listing of MWB17501) and house is owned or tenanted by Richard Arundell in the 1815 Enclosure map. The 1839 Tithe map shows an extension to the west of the house, which corroborates with a date stone of 1836 that marks when the house was extended, the building now occupied by a Joseph Arundel.
- 6.7.11 Outwith the Conservation Area within the village are several buildings of note. The Three Horseshoes, Brimpton Lane, Brimpton (MWB20512), located 79m southeast of the site, is an unlisted 19th century public house on the corner of Crookham Common Road and Brimpton Lane, visible from the 1887/80 OS map onwards, having

replaced a building previously visible on the plot from the earliest Rocque map of 1761. South of the Three Horses is Eastbank, Brimpton (MWB19165, NHLE 1117303), a mid-19th century Grade II listed brick house, located 136m south of the site. First seen on the 1887/80 OS map, it has undergone alterations and an extension shown on the 1969/70 OS map. Three unlisted buildings were constructed in the 19th century further south in Brimpton Village, on the west of Brimpton Lane, and can be seen from the 1887-80 OS map onwards. St Peter's Almshouses, Brimpton (MWB19692) is a terrace of almshouses built in 1854, located 167m south of the site. Brimpton Church of England Primary School, Brimpton Lane (MWB19693) was built in the Victorian period and has since been added to with modern extensions, located approximately 256m south of the site. Washoe Lodge, Brimpton Lane, Brimpton (MWB22304) consists of two 19th century houses with modern alterations, located 223m south of the site. In addition, an unlisted wall built in 1854 (MWB21426) running south to southeast with gateways to the Almshouses and school lies approximately 200m southeast of the site.

- 6.7.12 Crookham End House, Brimpton (MWB18861, NHLE 1303127) is a Grade II listed 19th century house, 412m southwest of the site. It's neighbour, Little Court (MWB20488) is an early unlisted 19th century house (formerly Grade III), 399m southwest of the site. Both are seen in the 1880 Kingsclere map and the 1815 Enclosure Map, and it is possible that they are also present as the two buildings to the west of Brimpton on the 1761 Rocque map. It appears that Crookham End House may have been altered/extended between the 1808 and 1815 maps, however Little Court seems to have the same footprint throughout.
- 6.7.13 Two buildings and a cropmarked area dated from the Post-Medieval to modern period lie to the north of site. Manor Farmhouse, Brimpton (MWB19166, NHLE 1117304) is a Grade II listed 17th century to 18th century building located 307m north of the site, between the Medieval moat (MWB1514) and Brimpton Farm (MWB1513/17426) and the Chapel of St Leonard (MWB1515, NHLE 1303413 & 1005378). To the east of Manor Farmhouse across Brimpton Road lies the site of the former village pound, now a small enclosure (MWB21484) used from the late 19th to the early 20th century, shown from the 1815 Enclosure map (Figure 3.3) through to the 1932 OS map (not shown in Figure 3.9) located approximately 329m north of the site. 'Linears south of Roman Road' (MWB2398) have been identified by aerial photography and consist of earthworks possibly related to drainage of ground liable to flooding, and irregular cropmarked linear features, some forming incomplete enclosures. The cropmarks are undated however the earthworks have been roughly dated Post-Medieval to Modern. The southern border of this monument is approximately 417m north of the site.
- 6.7.14 Brimpton Lodge and Oak house, to the east of Brimpton on the north side of Wasing Road, were both built in the 17th century and can be seen on the Kingsclere 1808 map. Brimpton Lodge, Wasing Road, Brimpton (MWB22316), located 274m east of the site, is an unlisted detached house with several alterations, the earliest architectural style being 17th century Jacobean, with later Georgian and Victorian extensions and alterations. It is shown from the 1808 Kingsclere to the 1970 OS map (Figures 3.2-3.10), and is still extant. Oak House (formerly Glebe Cottage), Wasing Road, Brimpton (MWB22633), located 327m east of the site is an unlisted building dated from the 17th century; it is possibly on the Rocque map of 1761 but it is difficult to say with certainty. It is, however, visible on the Kingsclere 1808 map and the Enclosure map of 1815 (Figures 3.2-3). In the 19th century two new buildings were added in the vicinity of Brimpton Lodge and Oak House, namely Close Cottage and Vine House, both of which can be seen on the 1815 Enclosure map. Vine House, Brimpton (formerly the

Vicarage) (MWB20447) is an unlisted former vicarage of at least 19th century date, located 344m east of the site. Close Cottage, Brimpton (MWB21562) is an unlisted 19th century former post office, located 319m east of the site.

7 AERIAL PHOTOGRAPHS AND LiDAR

- 7.1 All available vertical and oblique aerial photographs listed on cover search number AP/133290 were examined at the Historic England (HE) Archive on 19th April 2022. The available photos were taken between 1943 and 2007. Vertical photographs were examined using a magnifying mirror stereoscope. The online Cambridge collection of aerial photographs (CUCAP) was also examined, along with the 'Britain from Above' website. Images taken between 1985 and 2022 were examined at www.earth.google.com. The new HE Aerial Photo Explorer <https://historicengland.org.uk/images-books/archive/collections/aerial-photos/> and Aerial Mapping Explorer sites <https://historicengland.org.uk/research/results/aerial-archaeology-mapping-explorer/> were also examined, but did not cover the search area. There was also no NMP coverage available.
- 7.2 No crop or earthwork features could be identified within the redline area from any of the available formats.
- 7.3 To the northwest of the site is an extensive area of cropmarks containing linear features and pits. In the northwest corner of the field is a large amorphous feature which may suggest an area of quarrying. The clearest examples of these features were found on obliques SU 5565/1-3 dated 30th June 1994. This is likely to be equivalent to HER entry MWB17871 which is thought to be a Roman settlement.
- 7.4 North of the site and directly east of Manor Farm, a series of intercutting dark linear features could be identified. Some of the linear features were parallel with each other and may have been double ditches features or enclosures. The features were visible on oblique photographs SU 5665/3-12 dated 20th July 1984. It is likely that these features are the ones recorded under HER entry MWB2404.
- 7.5 No photographs of the study area were available to view online from either the CUCAP or Britain from Above websites.
- 7.6 The timelines available on Google Earth (GE) spanned 1985 to 2022, unfortunately the 1985 timeline had very poor visibility, but the rest of the timelines were mostly clear, with the exception of 1999 which only showed the southern half of the study area.
- 7.7 To the east of the probable Roman settlement (MWB17871) and within the southwest corner of the grounds for Manor Farm there are a series of negative linear features suggestive of field divisions. These are clearest on Google Earth timeline 2021.
- 7.8 LiDAR data from the Environment Agency website was also examined for this study. <https://environment.data.gov.uk/DefraDataDownload/>
- 7.9 A northeast-southwest aligned bank was visible on lidar to the southwest of the redline area. This matched the description and location of a linear bank which has been identified between Brimpton and Upper Hyde End (MWB21865).

8 ARCHAEOLOGICAL POTENTIAL AND SIGNIFICANCE

- 8.1 This review of the archaeological and historical background to the site, along with the information from the Historic Environment Record shown on Figure 2 and detailed in Appendix 1, suggests that there is generally low potential for significant archaeological activity of any period within the site area, with the exception of the possible remains of two buildings depicted on the 1761 map.
- 8.2 **Prehistoric** activity in the study area is attested by a smattering of findspots of worked flint around the site. This suggests a background of activity in the area, but there is no evidence of settlement features. The potential for stray finds and other features or deposits of this date on the site area is assessed as **low**. Activity relating to settlement/funerary is likely to be of **moderate** significance depending on their ability to contribute to research themes, while further stray finds may be considered of **low** significance.
- 8.3 There is little definite **Roman** activity in the study area, although there is activity to the north of the site which may relate to settlement. There is no modern evidence for the reputed hypocaust or the villa recorded immediately to the west of the site and there is consequently little identified possibility of Roman activity in the vicinity of the site. The potential is assessed as **low**. Activity relating to settlement is likely to be of **moderate** significance depending on their ability to contribute to research themes.
- 8.4 The **Saxon** centre of the village is likely to have been around St Peter's Church and to its southwest. This area lies within 200m of the site, but there is no modern evidence to confirm any Saxon activity in the village or in the study area. The possibility of activity of this period on the site cannot be ruled out, however the potential is assessed as **low**. Activity relating to settlement is likely to be of **moderate** significance depending on their ability to contribute to research themes.
- 8.5 The site lies very close to the **Medieval** core of the village, although there is no direct evidence that it extended into the site area. There is no evidence of ridge and furrow so it is possible the site area was laid to pasture as it was during later periods. The potential for features relating to this period is assessed as **low**. Activity relating to settlement is likely to be of **low-moderate** significance.
- 8.6 **Post-medieval** period. The HLC describes the site area as paddocks and the site is depicted as a field on all historic mapping, with the exception of Roque's 1761 plan which shows two plots with a building on each. These buildings likely to be Post-medieval in date, therefore there is a potential for remains of these structures to be present in the site area. Such buildings are likely to have had shallow foundations, although it is noted that the lack of later activity on the site is conducive to preservation. The potential for features relating to this period is assessed as **moderate-high** and the likely significance **negligible-low**.
- 8.7 Any features relating to agricultural activity may be considered of **negligible-low** significance depending on levels of survival and potential to contribute to regional research themes.
- 8.8 The Historic England guide, *Preserving Archaeological Remains* (2016), provides a framework within which to assess the likelihood of various classes of archaeological remains surviving within a site. Based on the undeveloped nature of the site and the

lack of any evidence for events relating to ground reduction, the assessment is that the conditions of preservation are likely to be good in relation to archaeological deposits of any period, should any have existed.

9 SETTINGS APPRAISAL

- 9.1 The intervisibility and other relevant interactions between the site and nearby designated and non-designated assets have been appraised and this section of the report will detail the findings of this settings appraisal.
- 9.2 The relevant potential settings impacts relating to the proposed development would predominantly result from the construction of new structures (dwellings) and associated infrastructure (Figure 13).
- 9.3 The settings assessment considers the existing significance of designated and non-designated assets, the change to existing settings which will be brought about by the proposed development, the resulting effect(s) on significance and the overall level of harm.

9.4 Significance rating and Settings Assessments

Introduction

- 9.4.1 This section describes the designated and non-designated heritage assets around the site which could have their settings and consequently their heritage significance affected by the proposed development. This includes a brief description of the heritage assets and a general assessment of their intervisibility with the site. This section also includes an assessment of the existing significance of designated and non-designated assets, the change to existing settings which will be brought about by the proposed development, the resulting effect(s) on significance and the overall level of harm.
- 9.4.2 No private property other than the site area itself was accessed as part of this project and in some cases the settings assessment, with regard to views back towards the site, has been made using a combination of professional judgement, views from within the site, and views from points close to the asset. During the site walkover survey, the intervisibility and other relevant interactions between the site and nearby designated and non-designated assets were appraised. Viewpoints and Photographs are illustrated on Figures 4 and 5.
- 9.4.3 There are no Registered Battlefields or Registered Parks and Gardens which might be affected by the proposals. Buried archaeological assets are themselves considered to have the potential for settings. However, no relevant assets have been identified in the vicinity that might be subject to a setting impact and a neutral effect is currently assessed as occurring to this asset class. No locally listed buildings have currently been identified in Brimpton.
- 9.4.4 There is a single Scheduled Monument within the 500m study area which comprises the Medieval St Leonard's Chapel (1005378), which is also a grade II* listed building (NHLE 1303413). There is no intervisibility between this monument and the site. The 14th century St Leonard's chapel represents the Domesday church of Shalford Manor held by the Knights Hospitallers. The chapel is part of a small area of Medieval

settlement to the north of the historic core of Brimpton, which includes Brimpton Manor Farm, the remains of a Medieval moated manor, Manor Farm, a 19th century farmhouse which may have Medieval origins, and the later 17th century Manor Farmhouse. The scheduled monument therefore has no inter-relationship with the site area, which is associated with the historic core of Brimpton around St Peter's Church. As such the proposed development is considered to have a **neutral** impact on this asset class and the scheduled monument is not considered further in this report.

Significance rating

- 9.4.5 There are 10 **listed buildings** within a 500m radius of the site. All are Grade II, apart from the scheduled monument of St Leonard's Chapel, which is Grade II*; the latter has no potential to be affected by the proposals and is not relevant to this settings assessment. There are seven Listed Buildings in close proximity to the site, all of which are situated either to the west or south, as shown in Figure 4. The majority of these Listed Buildings do not share intervisibility with the site. There is, however, intervisibility between the site and the War Memorial (NHLE 1458970) and potential intervisibility with Elmet House (NHLE 1319532). In addition, the spire of St Peter's Church is visible on the skyline. Listed buildings are considered to have high significance by virtue of their national designation.
- 9.4.6 The site lies partly within **Brimpton Conservation Area**. As a local authority designated asset, Conservation Areas are deemed to be of **medium** significance, although listed buildings within them may both individually and, where applicable, in group value, be considered to be of **high** significance.
- 9.4.7 There are also two **non-designated heritage assets** (NDHA) with intervisibility and possible inter-relationship with the site, the Former Forge Stores (MWB21563) and Forge Cottage (MWB21564).
- 9.4.8 The Former Forge Stores is a small brick building with a tile roof and louvre built in the 19th century as a smithy. It is currently in use as a hairdresser but was the village stores from c.1920 to 2016. Recent conversion works have seen some additions to the gable ends, and the large shop windows are unlikely to be original features. The building retains little relation to a smith's workshop, but it is recognisable as a 20th century shop, although it does not retain any 20th century signage or a contemporary shop frontage. The significance of this building is therefore assessed as **negligible**.
- 9.4.9 Forge Cottage is a former blacksmith's cottage of at least 19th century date; it is not depicted on the 1839 tithe map but is shown on the 1880 OS map. It is a two-storey brick house with slate roof and retains some baseline heritage value despite the loss of original windows on the frontage and the chimney stacks. The significance of this building is therefore assessed as **negligible**.

Settings Assessment

- 9.4.10 **St Peter's Church** (NHLE 1117302) is said to be built on the site of the old (Saxon) church at the historic centre of the village. It has Medieval origins but was largely rebuilt in 19th century. The spire of St Peter's Church is visible on the skyline from the site, however, as noted in HE's guidance on the *Setting of Heritage Assets*, spires and towers are designed to be visible at distance, but development within the envelope of visibility

does not necessarily affect the heritage value of the church. In this case, the proposed development is small-scale, there are no tall elements that will compete with the spire (such as a wind turbine or tower block) and it will not affect a designed or associative view. As such, the impact on setting is assessed as **neutral**.

- 9.4.11 The **War Memorial** (NHLE 1458970) is a grade II listed stone cross commemorating the dead of WWI and WWII. It is situated at a focal point of the village at the crossroads of Brimpton Road, Crookham Common Road and Church Lane. As a gathering place for the people of the village, significant views of the cross are inward-looking towards the monument and, whilst it is located in a prominent position, its setting can be defined as itself and its immediate curtilage. Views looking out from the monument are irrelevant to its heritage significance and are amenity only, rather than an element of setting. The southern part of the site would be seasonally visible and buildings on the site would be partially visible from the monument. However, additional building in the vicinity of the monument will have no effect on its heritage significance and, consequently, the impact of the proposals is assessed as having a **neutral** impact.
- 9.4.12 **Elmet House**, formerly Brimpton Villa, (NHLE 1319532) is a Grade II listed, early 19th century Georgian brick villa with Victorian and later extensions. The building is located at the centre of the village and looks north towards the crossroads and north along Brimpton Road. Due to lack of access, it was not possible to fully assess the intervisibility between the asset and the site. However, it was noted during the site walkover that Elmet House is situated on relatively high ground and that, therefore, there is potential intervisibility. Conversely, it was noted that the view to Elmet House from the site was obscured by mature hedges and trees (Photographs 1, 5, 7, 9 and 16) and, whilst seasonal variation will affect visibility to some degree, it is likely that views from the asset over the site are filtered to some degree year-round.
- 9.4.13 The setting of Elmet House can be largely defined as its curtilage, although its position close to the centre of the historic core of the village and its size make it a prominent building within the settlement. As such, it has some group value associated with the village as a whole that is wider than its curtilage, although this is connected to the Conservation Area, rather than relating to its individual setting. The site area is consequently assessed as outside the setting of Elmet House itself and the partial and filtered views over the site are considered to be amenity only; it is well established that visibility does not necessarily equate to harm. The proposals would therefore have no effect on its heritage value, thus, the impact of proposed housing on the site is assessed **neutral**.
- 9.4.14 **Brimpton Conservation Area** was designated in 1971 and is supported by a Draft Conservation Area Statement written in 1997 which is available on request from West Berkshire Council. It has not been completed and contains a number of unwritten sections and some missing locations.
- 9.4.15 The Conservation Area boundary is clearly shown in this document, however, the inclusion of two open areas to the north of Crookham Common Lane and either side of Brimpton Road (see Figure 4) appears somewhat arbitrary. Communication with the conservation department at WBC (Debra Instone) revealed that some CA boundaries, as depicted on digital mapping, had been erroneously altered "*due to the importation of a paper map from circa the 1980s into a digital system at an inappropriate scale with no digital clean-up of the lines so that they snap to OS features. This has been*

further exacerbated by the OS undertaking a digital rectification of the original base map following the introduction of more accurate geo-coordination software which has seen some features in the County move by 12 meters or so.” She also noted that the CA boundary to Brimpton “does appear slightly arbitrary”. However, the description of the conservation area in the CA Statement describes the open areas north of Brimpton Road as part of the CA. The description reads thus, ‘To the north along Brimpton Road the conservation area comprises purely of open space surrounded by hedges and smaller trees. This continues to the boundary of the area with some housing beyond the boundary.’ As such, the inclusion of this area appears to have been intended.

- 9.4.16 However, this area, which includes the southern part of the site does not meaningfully contribute to the ‘special architectural or historic interest’ (NPPF21 para 191) of the Conservation Area. The HLC labels the site area as ‘paddocks’ and the area just beyond the southern borders of the site is described as ‘historic settlement’. The open spaces correspond to the southern parts of two fields depicted on the Brimpton tithe map of 1839. The field to the west of Brimpton Road (plot 108) is named as Jack’s Meadow and was carved up in the modern period to create a plot for the 1920s Wayside house and for later modern housing along The Willows at the north end. The current site boundary therefore follows an arbitrary path across this space as defined by modern boundaries.
- 9.4.17 The site area lies within ‘Blacksmith Meadow’ in 1839 but simply indicates that the blacksmith owned it; this does not, therefore, convey any specific historic interest and it was clearly laid to pasture during that period. At the time of the tithe map Forge Cottage and Former Forge Stores, the blacksmith’s residence and workshop which are located immediately south of the site, had not been constructed. The meadow, despite superficial appearances, was therefore not associated with these buildings. Historically an open field, plot 107 does not have any special historic interest and the CA boundary line passes across the field at an arbitrary point, not connected in any way with historic boundaries and apparently just a continuation of the boundary line from the east side of the CA where it angles around the north side of the plot containing Kiln Cottages.
- 9.4.18 With consideration of the above discussion, it is recommended that the area shaded in green on Figure 4 is omitted from the Conservation Area.
- 9.4.19 Currently, however, the southern part of the site is identified as being within the Conservation Area. The site area is open ground, therefore there are views across it from other parts of the CA. The nature of the site area, as an area generally lacking in heritage significance, means that these views are considered to be largely amenity views. The introduction of modern housing to the site area would not appreciably alter the heritage significance of the CA, which is focussed to the south around the church and the crossroads and is broadly inward looking. The site area is also well screened despite inevitable seasonal variation in the density and height of the mature hedging which surrounds the site.
- 9.4.20 The CA Statement notes that views from the north edge of the CA boundary where it is concurrent with the two field areas ‘are good towards the north and east’. These views include the northern part of the site, although it is surrounded by mature hedgerows which precludes long-range views in a number of directions, and also some distant and fairly open countryside interjected with scattered dwellings; there is no discernible visual connection to the Medieval settlement around St Leonard’s Chapel from this

location. The modern housing at The Willows and The Weavers is now part of this view and has introduced a modern and built-up element which was not extant when the CA Statement was written. As noted above, the inclusion of the southern part of the site area within the conservation area as an arbitrarily defined part of an existing pasture field does not contribute to the heritage significance of the village, particularly as there is precedent during the 18th century for built-environment within the site area. Despite the existing modern developments to the north, there are still appreciable views to the north that contribute to the significance of the conservation area; however, these largely represent amenity not heritage views.

- 9.4.21 The site area is therefore not considered to significantly contribute to the CA and a sensitively designed housing development would consequently have little appreciable effect on the heritage significance of the CA. The impact of the proposals on the CA is considered to be **negligible adverse** at worst, with the potential to reduce this to **neutral** depending on the detail of the proposals.
- 9.4.22 **Forge Cottage and the Former Forge Stores** are recorded on the HER and are therefore non-designated heritage assets. These are the mid-late 19th century smithy and blacksmith's cottage which are related through their historic value as representing contemporary buildings associated with the village's blacksmith. The northern boundary to the curtilage of these buildings was originally along the north side of Forge Cottage; it was extended north post-1932. The site area lies within a field named Blacksmith Meadow, however, as noted in paragraph 9.4.17, this was named before these assets were built. Consequently, the site area does not appear to have any direct historic relationship with Forge Cottage and the Former Forge Stores. There is no evidence that it was still in the ownership of the blacksmith when these buildings were constructed; indeed, the original blacksmith's forge may have been one of the structures illustrated on the 18th century plan within the site.
- 9.4.23 There is some intervisibility between the rear of Forge Cottage and the site (Photograph 7). However, the key associations of this asset relate to the roadside location to the south and more directly to its connection with the smithy and the yard area, also to the south. The original curtilage of the buildings and the views of it from the road are therefore considered to form the setting of these assets. Views looking at the frontage of the Cottage and the smithy from Crookham Common Road and do include very limited intervisibility with the site, but any building on the site is likely to be obscured by existing vegetation and the 'gorge' buildings themselves. The impact on the setting of Forge Cottage and the Former Forge Stores is therefore not considered to be appreciable and is **neutral**.

10 IMPACT ASSESSMENT

Above Ground Archaeological Remains

- 10.1 There are no applicable above-ground archaeological (rather than 'heritage') features that might suffer a direct physical effect from the proposals.

Buried Archaeology

- 10.2 The proposals involve the construction of a small housing development with associated infrastructure within the site's redline. Any archaeological features therefore have the

potential to suffer a significant impact from groundworks and could be disturbed, altered, truncated or possibly removed entirely by groundworks undertaken to construct the proposed development. The main impact is likely to take the form of a site strip/partial site strip, followed by the insertion of footings/piles, excavation for cable/service runs and landscaping. The presence of reputed Roman villa remains immediately west of the site has not been substantiated in the modern period and the Saxon village centre appears to lie to the southwest of the church, although lack of archaeological investigation in the village centre may skew these results. Based on current knowledge of the potential for archaeological features to be present on the site, the unmitigated overall impact of the proposals is predicted to be **slight adverse** set against a **low** potential for finds or features from the Prehistoric, Saxon, Roman and Medieval periods and a **moderate-high** potential for the remains of buildings from the Post-medieval period within spatially restricted areas of the site. With the exception of the two building plots during the Post-medieval period, the site area has since been laid to pasture. The presence of archaeological deposits of a **moderate** significance cannot be ruled out.

- 10.3 Despite the generally low potential for significant archaeological deposits to exist on the site, there is evidence for earlier Post-medieval buildings and the area has been largely undeveloped since the 18th century; therefore, mitigation in the form of trial trenching is likely to be required by the archaeological advisors to the LPA.

Settings

- 10.4 The site is screened by mature hedgerows which obscures much of the site from view during the warmer months and acts to filter views in the colder months. The topography of the northern half of the site slopes down towards the north with the result that this part of the site is not visible from the greater part of the Conservation Area. Therefore, due to existing vegetation and topography, the site is well screened, particular in the northern half.
- 10.5 Views into and out of the site do, however, include heritage assets in the form of three listed buildings, the War Memorial, St Peter's Church spire and Elmet House, and two non-designated assets, Forge Cottage and the Former Forge Stores. Assessment has indicated that, whilst parts of the site are visible from these assets to varying degrees, the site area does not form part of the setting of these assets and that views over the site area are of amenity value only. The impact on the listed buildings and the NDHAs is therefore assessed as **neutral**.
- 10.6 The southern third of the site lies within the Conservation Area but this area makes no meaningful contribution to the special historic interest of the designated area and it is suggest that the boundary should be altered to exclude this area in accordance with para 191 of NPPF. The impact on the Conservation Area of development within an area in which no heritage value can be appreciated and which is also fairly well screened by vegetation is assessed as predominantly resulting in an amenity effect, rather than an effect on heritage significance as conveyed by setting. Historic England draw a clear distinction between 'setting' and 'amenity' and the latter effect does not benefit from the 'considerable weight' that accrues to harm to the setting of an asset in the planning balance. Nonetheless, given that the site area is partially included within the conservation area boundary and on the grounds that views do contribute to significance (albeit predominantly through amenity value) it is possible that a **negligible adverse** effect might be attributable to the proposals. A reduction of this effect to **neutral**

may be possible through appropriate design solutions within the development proposals.

- 10.7 A potential, unmitigated **negligible** adverse effect on the Conservation Area would still act to trigger NPPF21 paragraph 202. This requires the LPA to undertake a balancing act of the potential harm to the identified heritage assets against the public benefit of the proposals. The potential impact of the proposals will not appreciably affect the heritage significance of any heritage asset as experienced through setting and it is considered that the public benefit arising from the provision of new accommodation will outweigh any harm. It is, consequently, the opinion of this report that the proposals are not at sufficient variance with current policy and guidance and that permission should be granted.

Standing Remains

- 10.8 There are no relevant standing remains within the redline, resulting in a neutral effect on this asset class.

Mitigation

- 10.9 Mitigation in the form of a suitable programme of works in advance of development is likely to be recommended. Given the likelihood that the site will not contain significant archaeological deposits which might result in a requirement for preservation *in situ* or extensive mitigation works, it is anticipated that the first stage of intrusive investigation could take the form of post-determination pre-commencement trial trenching. In regard to setting, the existing vegetation should be kept and maintained to preserve the screening of the site and consideration should be given to retaining open space in the southern part of the site to provide a suitable green buffer between the new development and the historic core of the village. High-quality design in appropriate materials suitable for the character of the village is also recommended, as well as a building layout which includes dispersed housing within large plots.

11 CONCLUSIONS

- 11.1 This proportionate Heritage Impact Assessment has been prepared by Diana King and team of Foundations Heritage to accompany a planning application in relation to a proposed small housing development on land to the east of Brimpton Road, Brimpton, Newbury, West Berkshire. The report has considered the potential for the proposals to affect known and potential heritage assets, as required by the National Planning Policy Framework 2021.
- 11.2 The report has identified that the proposed works have the potential to affect buried archaeological deposits but that the potential for such deposits is considered low for all periods except the Post-medieval period. The presence of Prehistoric finds, Roman settlement remains associated with a possible hypocaust in the vicinity of the site and Saxon settlement remains cannot be ruled out but are assessed as unlikely on the basis of current evidence. The site has been largely undeveloped other than known Post-medieval buildings, therefore any existing remains could be well-preserved.

- 11.3 Potential harm to the setting of listed buildings and non-designated heritage assets has been assessed as **neutral** given that the site area does not contribute to their heritage significance. The southern third of the site lies within the Conservation Area, however, this part of the conservation area has been assessed in this report as having no special historical or architectural interest; indeed, it is recommended that it be removed from the Conservation Area. The unmitigated potential harm of the proposals to the setting of the Conservation Area has been assessed as **negligible adverse**. It is possible this could be reduced to a **neutral** effect through design solutions within the development proposals.
- 11.4 Mitigation in the form of archaeological trial trenching may be considered appropriate in advance of any groundworks. The sensitive design of the proposals will also be key to reducing potential adverse effects to a minimum or to entirely remove them.
- 11.5 It is ultimately at the discretion of the Local Authority decision-maker as to whether harm exists that could trigger paragraph 202 of the NPPF (2021), which requires that harm should be weighed against public benefit. It is the opinion of this report, however, that the proposals, suitably mitigated, are not at sufficient variance with current policy and guidance to preclude development on the site.

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13 ACKNOWLEDGEMENTS

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APPENDIX 1:

Gazetteer Historic Environment Information

HER Table: Monuments

MonUID	RecordType	Name	Summary	Period	GridRef	Easting	Northing
MWB5290	Monument	BRIMPTON VILLAGE	'Brintone' recorded in Domesday. Later variants of the name Include Brimton (1177), Brunton (1205), Brompton (1284). Information from Gelling.	11th century to 16th century	SU 55699 64700	455699	164700
MWB1515	Building	Chapel of St Leonard, Manor Farm, Brimpton	Scheduled Monument and Grade II* listed small medieval chapel, described as dated to c1100 but conjectured to be the second Domesday church in Brimpton	11th century to 17th century	SU 55820 65272	455820	165272
MWB22635	Landscape	Churchyard of St Peter's Church, Brimpton	Churchyard surrounding a church of 11th century origins and extended in the 20th century	11th century to Early 21st century	SU 55731 64678	455731	164678
MWB5291	Building	St Peter's Church, Brimpton	Grade II listed church, largely rebuilt in 19th century but with tower dating from 1748, and suggestion of reused Roman material	11th century to Late 19th century	SU 55731 64701	455731	164701
MWB17426	Monument	Manor Farm, Brimpton	Historic farmstead documented in 19th century and still partly present in 21st century but likely to have medieval origins	12th century to Late 19th century	SU 55792 65225	455792	165225
MWB18925	Building	Kiln Cottage (formerly Kiln Cottages), Brimpton	Grade II listed 16th century timber-framed house	16th century to Early 21st century	SU 55707 64838	455707	164838

HER Table: Monuments

MWB22633	Building	Oak House (formerly Glebe Cottage), Wasing Road, Brimpton	Unlisted, timber-framed house, possibly of 17th century date	17th century to Early 21st century	SU 56178 64864	456178	164864
MWB19166	Building	Manor Farmhouse, Brimpton	Grade II listed 17th century timber framed farmhouse with later brick facing	17th century to Late 19th century	SU 55795 65276	455795	165276
MWB19290	Building	The Old Post Office, Brimpton	Grade II listed 18th century house and former post office	18th century to Late 20th century - Present	SU 55883 64785	455883	164785
MWB18939	Building	Elmet House, Brimpton Lane, Brimpton (formerly Brimpton Villa)	Grade II listed Georgian brick villa with Victorian and later extensions	19th century	SU 55802 64732	455802	164732
MWB20488	Building	Little Court, Brimpton	Unlisted early 19th century house, previously part of Crookham End House, previously listed at Grade III	19th century to Early 21st century	SU 55422 64716	455422	164716
MWB18861	Building	Crookham End House, Brimpton	Grade II listed 19th century house, previously connected to Little Court	19th century to Early 21st century	SU 55401 64719	455401	164719

HER Table: Monuments

MWB20512	Building	The Three Horseshoes, Brimpton Lane, Brimpton	Unlisted 19th century public house	19th century to Early 21st century	SU 55900 64758	455900	164758
MWB19289	Building	Brimpton House, Church Lane, Brimpton (formerly Brimpton Farm)	Grade II listed 19th century house built by a tenant farmer, and used as accommodation for Land Girls during the Second World War	19th century to Second World War	SU 55757 64782	455757	164782
MWB19883	Monument	Brimpton War Memorial	Grade II listed stone cross commemorating the dead of the First and Second World Wars	Early 20th century to Second World War	SU 55793 64778	455793	164778
MWB5289	Monument	BRIMPTON	'BRYNING TUNE' RECORDED IN 944 ACCORDING TO W DE G BIRCH'S 'CARTULARIUM SAXONICUM' (1885-93). THE NAME MEANS 'ESTATE ASSOCIATED WITH BRYNI'. INFORMATION FROM GELLING.	Early Medieval/Dark Age to 11th century	SU 55699 64700	455699	164700
MWB22316	Building	Brimpton Lodge, Wasing Road, Brimpton	Unlisted detached house of perhaps 17th century origins, with Georgian and Victorian extensions and alterations	Jacobean to Late 19th century	SU 56124 64860	456124	164860
MWB17501	Monument	Brimpton House (Farm)	Historic farmstead documented in the 19th century and still partly present in 21st century	Late 19th century	SU 55739 64762	455739	164762
MWB21562	Building	Close Cottage, Brimpton	Unlisted brick building of at least 19th century date, a former post office	Late 19th century to Cold War	SU 56171 64833	456171	164833

HER Table: Monuments

MWB20447	Building	Vine House, Brimpton (formerly the Vicarage)	Unlisted tile-hung former vicarage of at least 19th century date	Late 19th century to Cold War	SU 56196 64858	456196	164858
MWB21564	Building	Forge Cottage, Brimpton	Unlisted former blacksmith's cottage of at least 19th century date	Late 19th century to Early to Mid 20th century	SU 55855 64798	455855	164798
MWB21563	Building	Former Forge Stores, Brimpton	Unlisted former smithy of at least 19th century date	Late 19th century to Late 20th century	SU 55863 64781	455863	164781
MWB14621	Find Spot	BRIMPTON MANOR FARM 1	1 SHERD LATE BRONZE AGE POTTERY, FOUND DURING FIELDWALKING	Late Bronze Age	SU 56070 65260	456070	165260
MWB11149	Find Spot	South of Brimpton School	Medieval pottery found fieldwalking	Medieval	SU 55950 64449	455950	164449
MWB1514	Monument	Moat at Brimpton Manor Farm	Earthwork remains of a moat, probably built as part of a medieval manor	Medieval	SU 55760 65315	455760	165315
MWB1513	Monument	Brimpton Manor Farm - medieval manor	Site of medieval moated manor around listed farmhouse and yard; a scheduled chapel and earthworks survive	Medieval to 17th century	SU 55779 65249	455779	165249
MWB5288	Place	BRIMPTON	Brimpton village. Recorded in AD 944, and in Domesday Book. The moated manor and 11th century chapel of St Leonard are located to the north of the present day village (see MWB1035).	Medieval to Early 21st century	SU 55699 64700	455699	164700

HER Table: Monuments

MWB19692	Building	St Peter's Almshouses, Brimpton	Unlisted terrace of almshouses, built in 1854 as six dwellings but converted to four flats	Mid to Late 19th century	SU 55884 64657	455884	164657
MWB19693	Building	Brimpton Church of England Primary School, Brimpton Lane	Unlisted Victorian village school in Brimpton founded as a parochial school and later a National School, still in educational use but with modern extensions	Mid to Late 19th century to Early 21st century	SU 55922 64574	455922	164574
MWB21484	Monument	Site of pound, Brimpton	A small enclosure next to Manor Farm, the village pound from at least the late 19th century to the early 20th century	Mid to Late 19th century to Early to Mid 20th century	SU 55850 65291	455850	165291
MWB21426	Monument	Wall with pedestrian gateways to almshouses and school, Brimpton	Unlisted brick and stone roadside wall with a decorative archway over a wrought iron gate to four almshouses, built in 1854, and another probably later arch into the schoolyard	Mid to Late 19th century to Late 19th century	SU 55930 64628	455930	164628
MWB21426	Monument	Wall with pedestrian gateways to almshouses and school, Brimpton	Unlisted brick and stone roadside wall with a decorative archway over a wrought iron gate to four almshouses, built in 1854, and another probably later arch into the schoolyard	Mid to Late 19th century to Late 19th century	SU 55930 64628	455930	164628

HER Table: Monuments

MWB21426	Monument	Wall with pedestrian gateways to almshouses and school, Brimpton	Unlisted brick and stone roadside wall with a decorative archway over a wrought iron gate to four almshouses, built in 1854, and another probably later arch into the schoolyard	Mid to Late 19th century to Late 19th century	SU 55930 64628	455930	164628
MWB21426	Monument	Wall with pedestrian gateways to almshouses and school, Brimpton	Unlisted brick and stone roadside wall with a decorative archway over a wrought iron gate to four almshouses, built in 1854, and another probably later arch into the schoolyard	Mid to Late 19th century to Late 19th century	SU 55930 64628	455930	164628
MWB22304	Building	Washoe Lodge, Brimpton Lane, Brimpton	Unlisted mid-19th century pair of semi-detached houses altered in the late 20th century	Mid to Late 19th century to Late 20th century - Present	SU 55901 64599	455901	164599
MWB2398	Monument	Linears south of Roman road	Cropmarked irregular linear features, some possibly forming incomplete enclosures, but also earthworks of probable drainage ditches	Post Medieval to Cold War	SU 56018 65466	456018	165466
MWB11551	Find Spot	BRIMPTON MANOR FARM 1	Flint cores, flakes and waste found fieldwalking	Prehistoric	SU 56070 65260	456070	165260
MWB11555	Find Spot	Field east of Manor View	Flint flake found fieldwalking	Prehistoric	SU 55970 65090	455970	165090
MWB11146	Find Spot	North of Bannister's Wood	Flint flake found fieldwalking	Prehistoric	SU 56120 64680	456120	164680
MWB11517	Find Spot	West of Brimpton School	Flake and scraper found fieldwalking	Prehistoric	SU 55570 64459	455570	164459

HER Table: Monuments

MWB14716	Find Spot	HOLDWAYS FARM	Flint core and flakes found fieldwalking	Prehistoric	SU 55449 64630	455449	164630
MWB11554	Find Spot	BRIMPTON MANOR FARM	Roman pottery found fieldwalking	Roman	SU 56080 65260	456080	165260
MWB3691	Monument	Brimpton crossroads by church	Note that a 'Hypocaust' was found is marked at this location on Ordnance Survey maps	Roman	SU 55779 64810	455779	164810
MWB3690	Monument	Possible Roman settlement in Brimpton	Artefact evidence for a possible Roman villa in the vicinity of the church	Roman	SU 55744 64704	455744	164704
MWB17871	Monument	Cropmarks northwest of Brimpton Manor Farm	Straight sided linear features and pits visible in aerial photographs, suggesting a Roman settlement	Roman	SU 55573 65359	455573	165359
MWB11550	Find Spot	East of Manor Farm, Brimpton	Flint flake found fieldwalking	Undated	SU 56000 65260	456000	165260
MWB14622	Find Spot	BRIMPTON MANOR FARM 1	Fragment of quernstone found fieldwalking	Undated	SU 56070 65260	456070	165260
MWB15700	Monument	Field northwest of Blandford Hithe	Rectilinear and linear cropmarks shown on aerial photographs taken in 1999	Undated	SU 55429 65008	455429	165008
MWB2404	Monument	Features east of Brimpton	Irregular or incomplete ditched enclosures and pits visible on aerial photographs	Unknown	SU 55955 65302	455955	165302

HER Table: Monuments

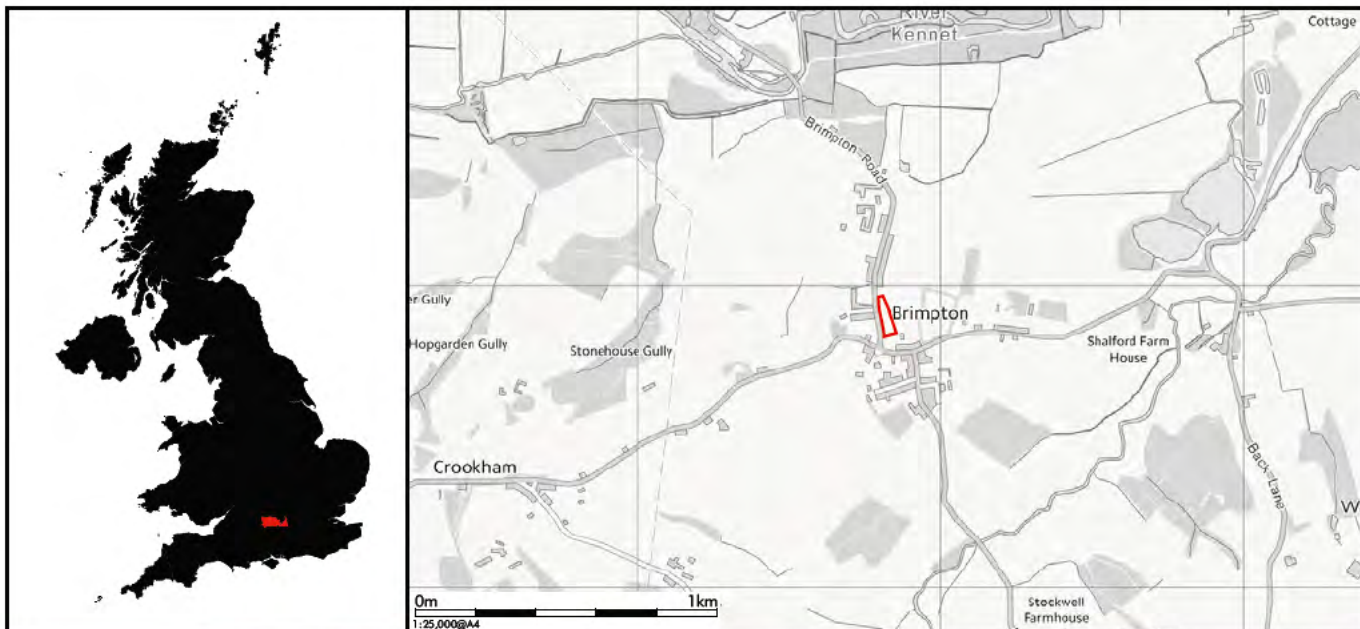
MWB21865	Monument	Linear feature between Brimpton and Upper Hyde End	Faint bank, possibly a former road, visible as a cropmark and as an earthwork on LiDAR imagery	Unknown to 18th century	SU 55610 64328	455610	164328
MWB19165	Building	Eastbank, Brimpton	Grade II listed mid 19th century brick house	Victorian	SU 55908 64698	455908	164698

HER Table: Events

EvUID	Name	DispDate	EventTypeT	Easting	Northing	GridRef
EWB349	Brimpton to Aldermaston Pipeline - Desk top study and field survey	1993	DESK BASED ASSESSMENT; SYSTEMATIC FIELDWALKING SURVEY; GEOPHYSICAL SURVEY	458080	164490	SU 58080 64490
EWB1049	An Archaeological Evaluation of land at Brimpton, Berkshire	2008	EVALUATION	455786	164821	SU 55786 64821
EWB350	Brimpton-Aldermaston Pipeline, Berkshire - Archaeological Watching Brief and Excavation	1993	OPEN AREA EXCAVATION; WATCHING BRIEF	458080	164490	SU 58080 64490
EWB972	Watching Brief between Manor Road Pumping Station, Brimpton and Woolhampton Sewage Treatment Works	2007	WATCHING BRIEF	456669	165806	SU 56669 65806
EWB124	Air Photo survey of Brimpton area	1999	AERIAL PHOTOGRAPHY	455401	164998	SU 55401 64998
EWB1005	SPAB Domesday Survey of Barns	1980s	BUILDING SURVEY; FIELD OBSERVATION (VISUAL ASSESSMENT)	449925	172605	SU 49925 72605
EWB594	Watching Brief, Chapel of St Leonards, Manor Farm, Brimpton	1996	WATCHING BRIEF	455813	165273	SU 55813 65273
EWB905	Warren House, Crookham Common Road, Brimpton, West Berkshire - An archaeological watching brief	2006	WATCHING BRIEF	455768	164827	SU 55768 64827
EWB917	The Middle Thames Valley: an archaeological survey of the river gravels	1975	AERIAL PHOTOGRAPH INTERPRETATION	462499	171999	SU 62499 71999
EWB535	Blandford Hythe, Brimpton Road, Brimpton, West Berkshire - An Archaeological Evaluation	2002	EVALUATION	455754	164894	SU 55754 64894
EWB534	Blandford Hythe, Brimpton Road, Brimpton, West Berkshire - A Geophysical Survey	2002	GEOPHYSICAL SURVEY	455748	164883	SU 55748 64883

HER Table: Events

EWB1808	Tracing Their Steps: Predictive Mapping of Upper Palaeolithic and Mesolithic Archaeology	2013-15	HERITAGE ASSESSMENT	450139	167287	SU 50139 67287
EWB285	Lower Kennet Valley Survey - 2nd and 3rd phases of fieldwalking	1982- 1987 and 1988- 1989	SYSTEMATIC FIELDWALKING SURVEY	457137	166862	SU 57137 66862
EWB15	Lower Kennet Valley Survey - 1st phase of fieldwalking	1976-7	SYSTEMATIC FIELDWALKING SURVEY; WALKOVER SURVEY	455049	166754	SU 55049 66754



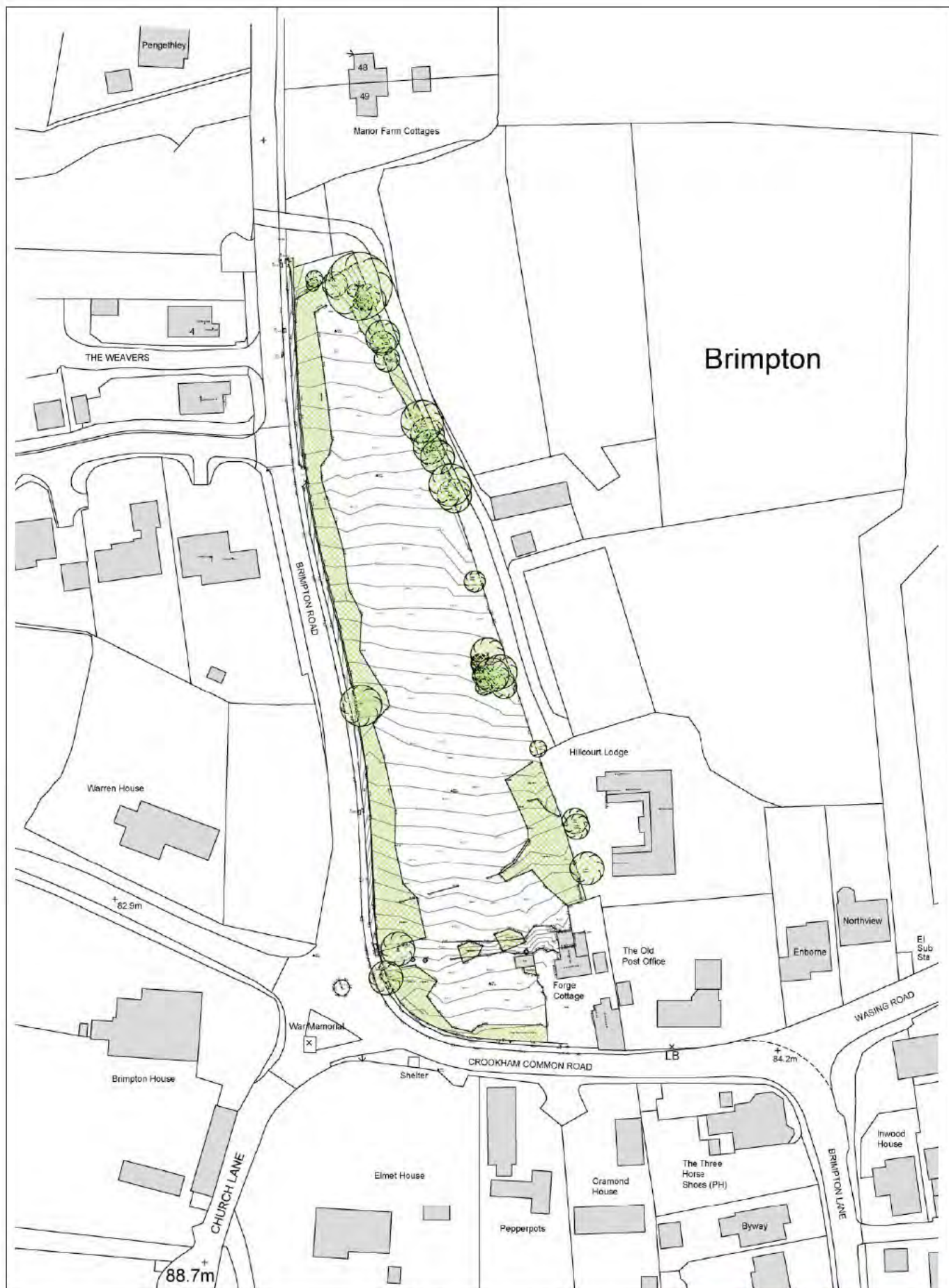
Site Outline

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Drawn By: HB
Approved By: DK
Date: 08/02/2023

Figure 1.1:
Site Location

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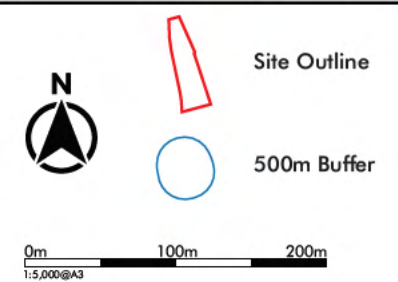
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Figure 1.2:
Topographical Survey of the Site

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HERITAGE**
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Site Code: BRB22
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 Approved By: DK
 Date: 25/01/23

Figure 2.2:
 Non-Intrusive Events within 500m of Site

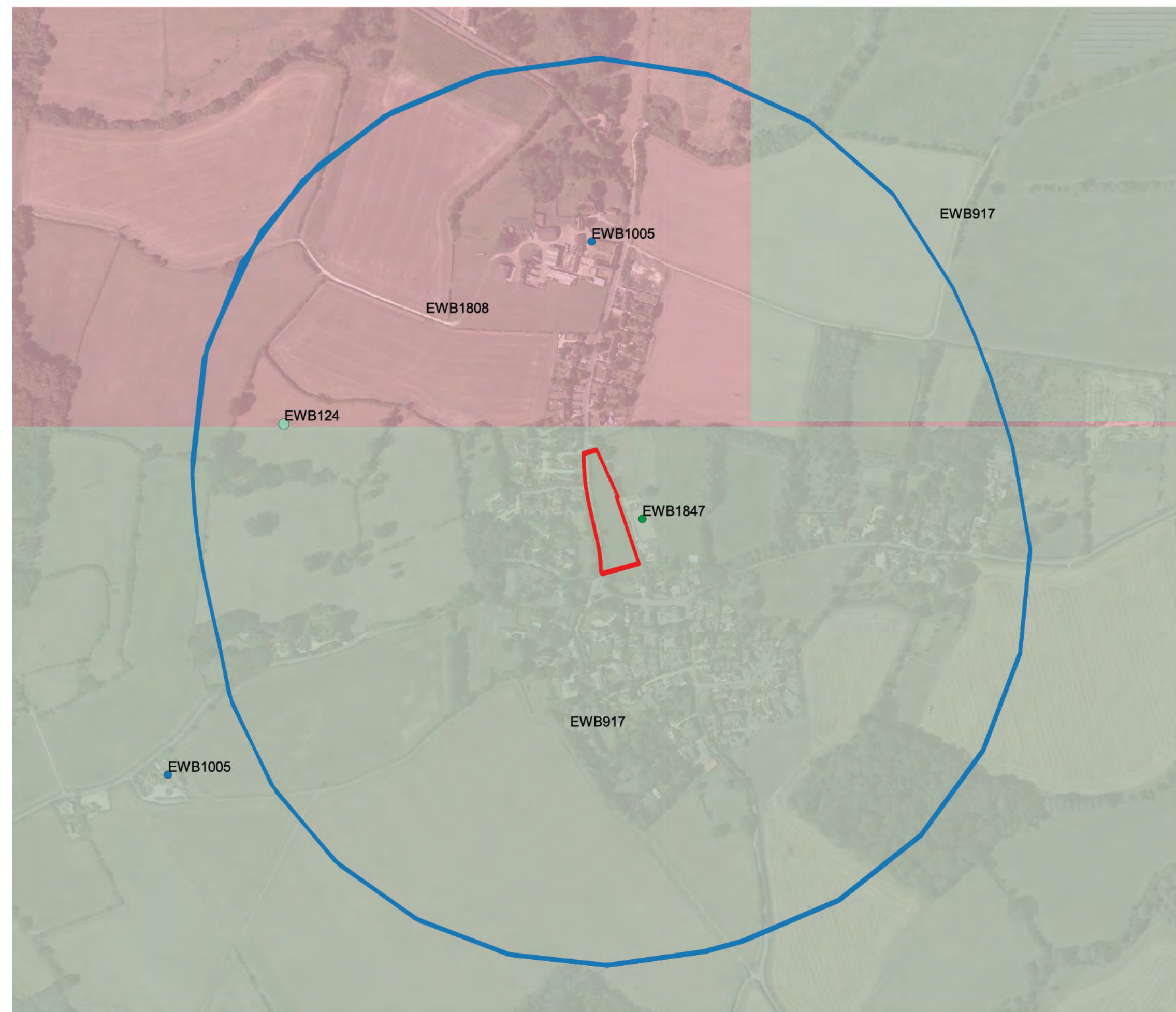


KEY

- Events Aerial Photography
- Events Heritage Assessment
- Events Building Survey/Field Observation
- Events Heritage Assessment/Field Visit

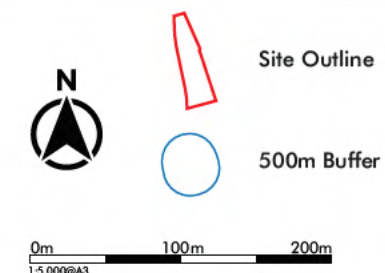
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Figure 2.3:
Intrusive Events within 500m of Site



KEY

- Events Fieldwalking/Walkover Survey
- Events Evaluation
- Events Geophysics
- Events Watching Brief
- Events Desk Based Assessment/
Fieldwalk/Geophysical Survey/Open Area
Excavation/Watching Brief

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Figure 3.1:
 Rocque Map, 1761



Site Outline

Approximate site location
 NOT TO SCALE



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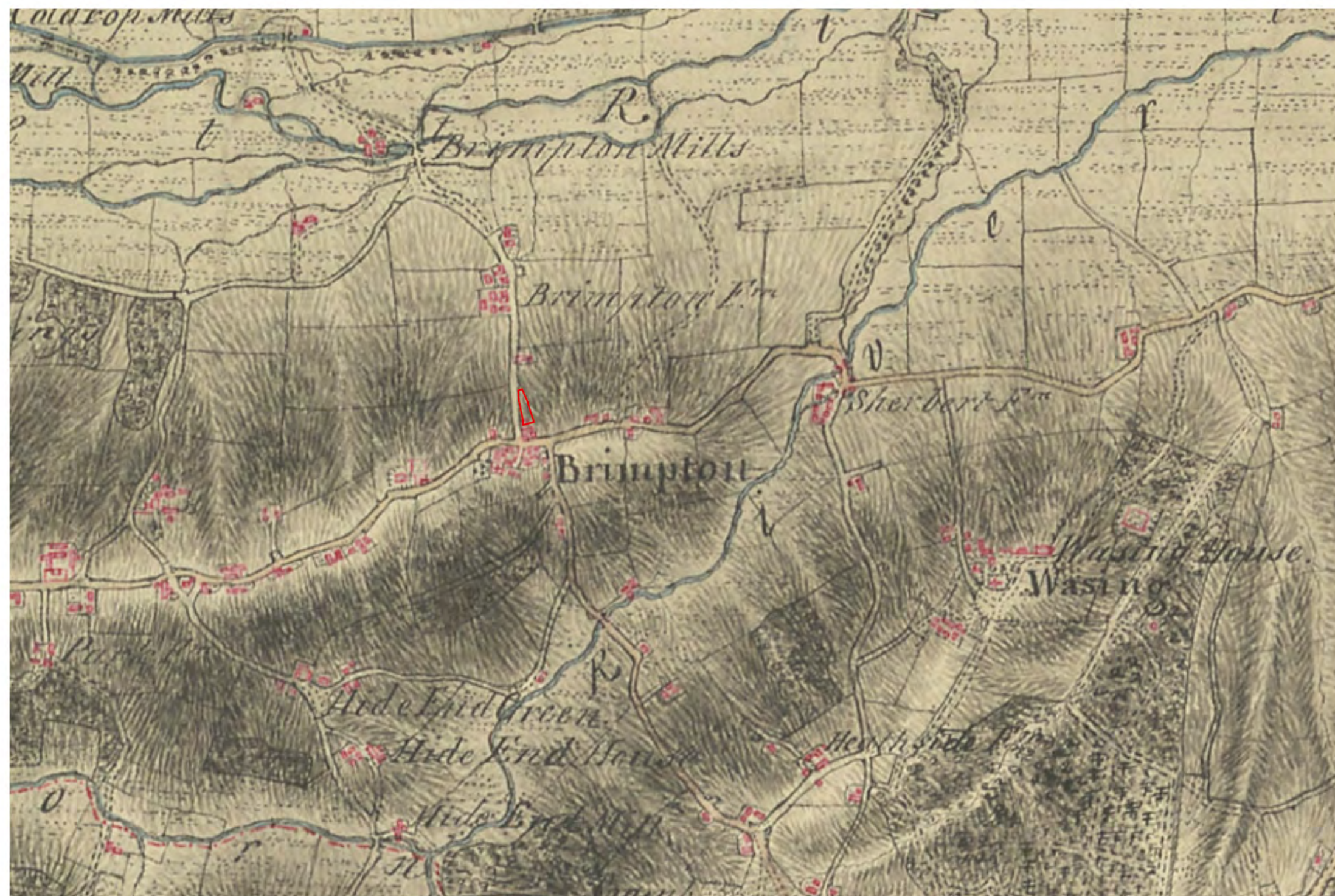
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Figure 3.2:
Ordnance Survey Drawing Kingsclere, 1808



Approximate
Site Outline

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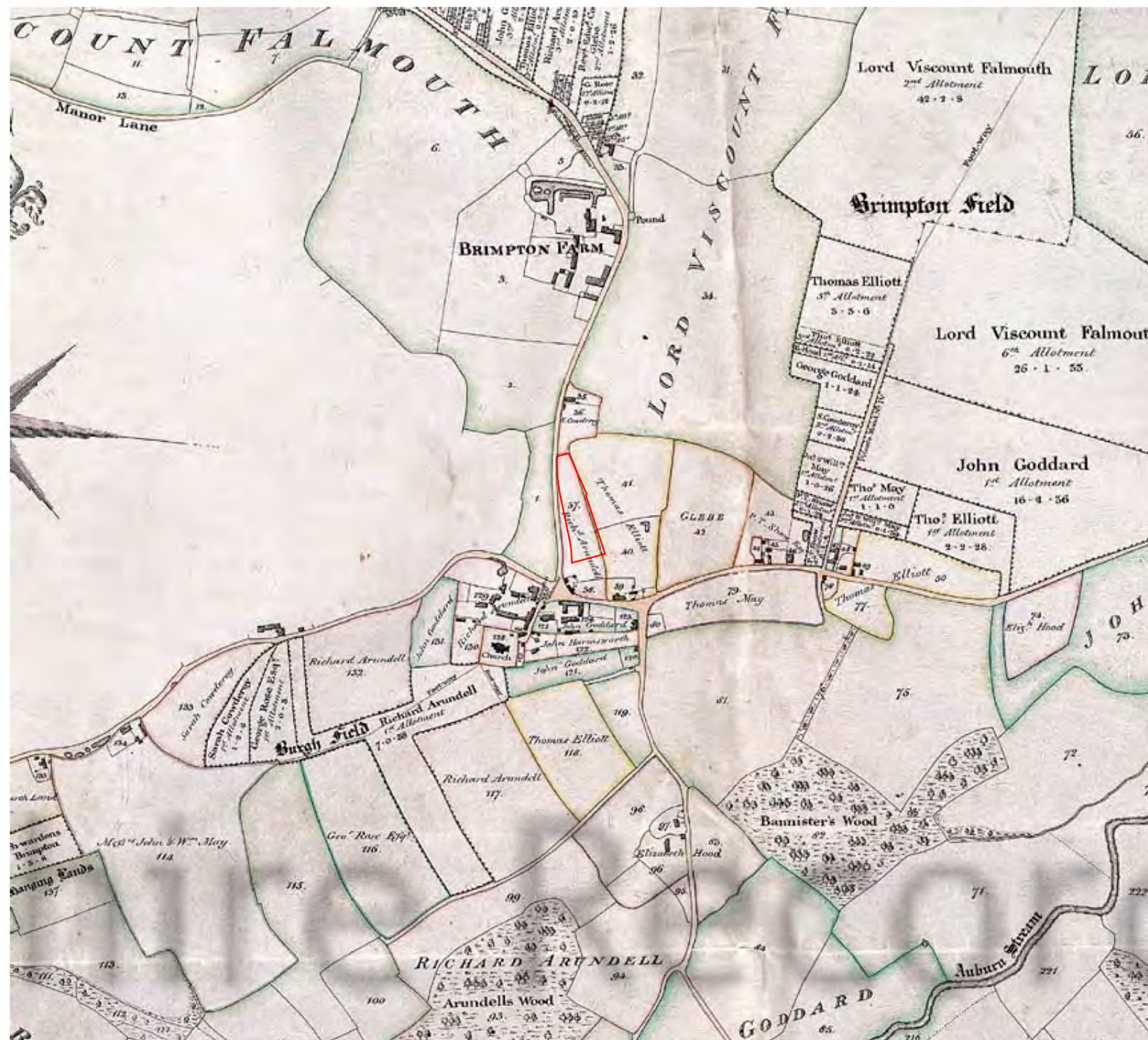
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Figure 3.3:
Brimpton Enclosure Map 1815



Approximate
Site Outline

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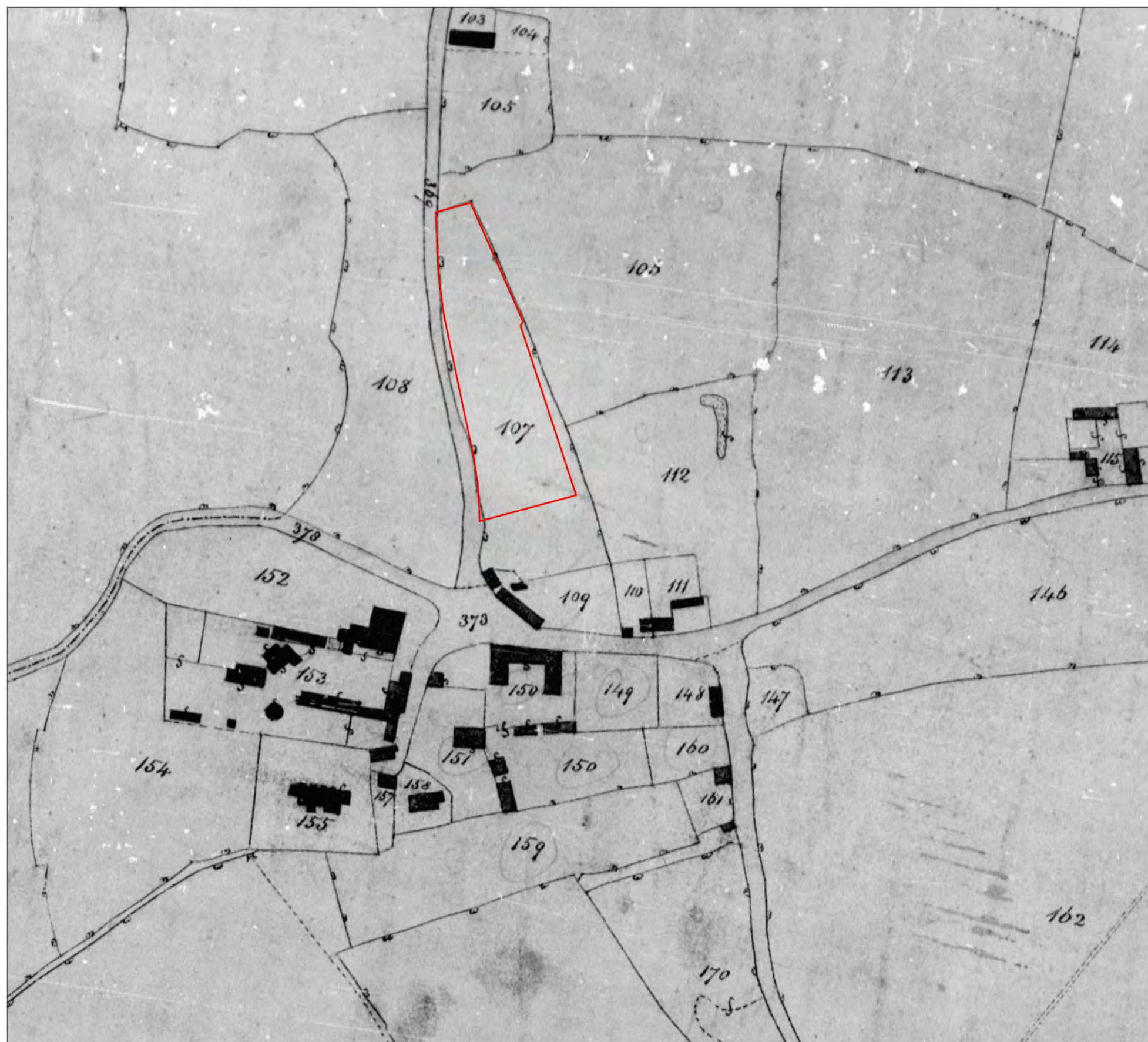
Site Code: BRB22
Drawn By: HB
Approved By: DK
Date: 20/01/23

Figure 3.4:
Tithe Apportionments 1839



Site Outline

NOT TO SCALE



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Figure 3.5:
Tithe Apportionments 1841



Approximate
Site Outline

NOT TO SCALE

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Figure 3.6:
Ordnance Survey Map, 1877-1880



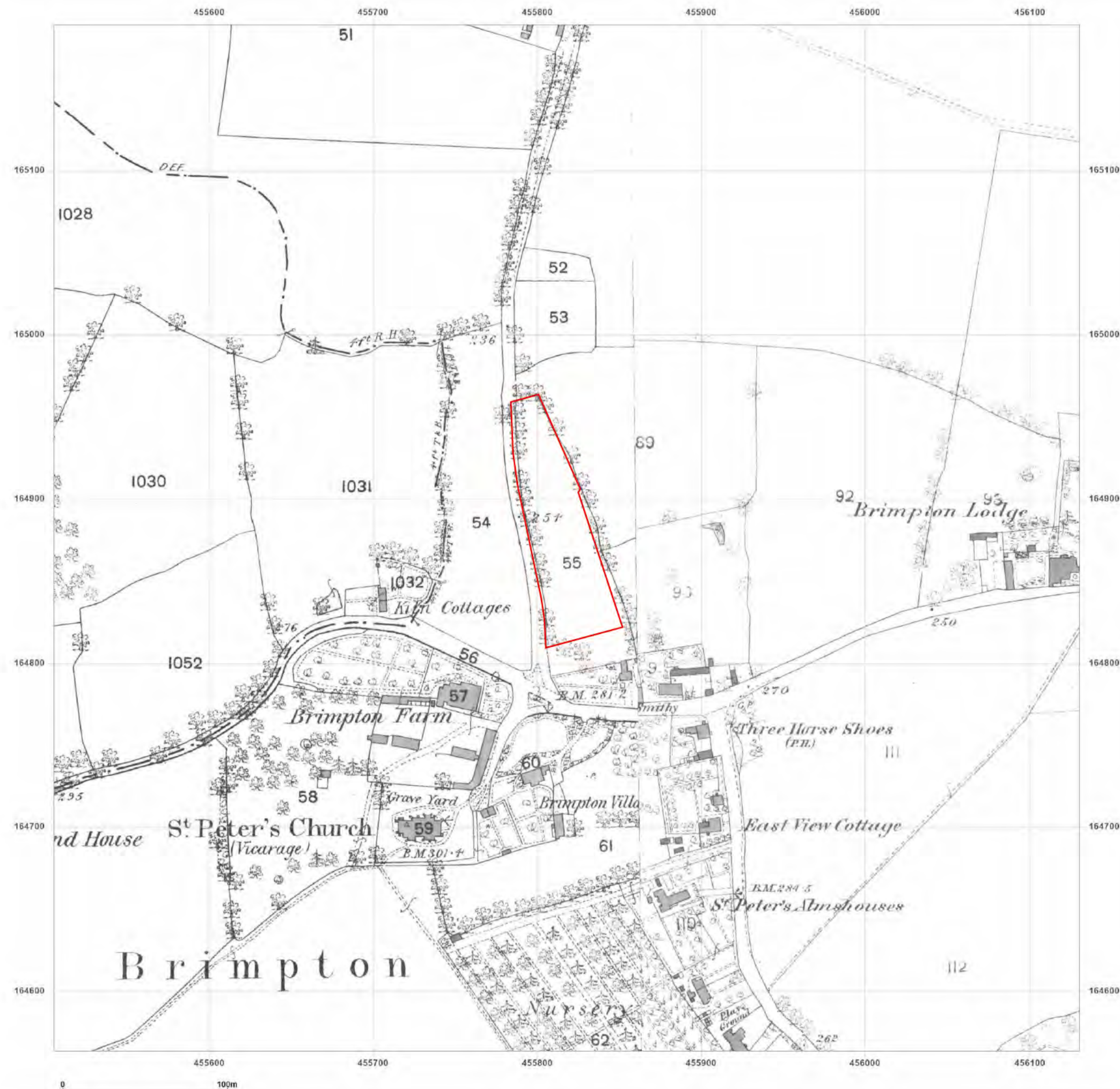
Site Outline

0m 100m
1:2500@A3

Surveyed 1880
Revised 1880
Edition N/A
Copyright N/A
Levelled N/A



Surveyed 1877
Revised 1877
Edition N/A
Copyright N/A
Levelled N/A



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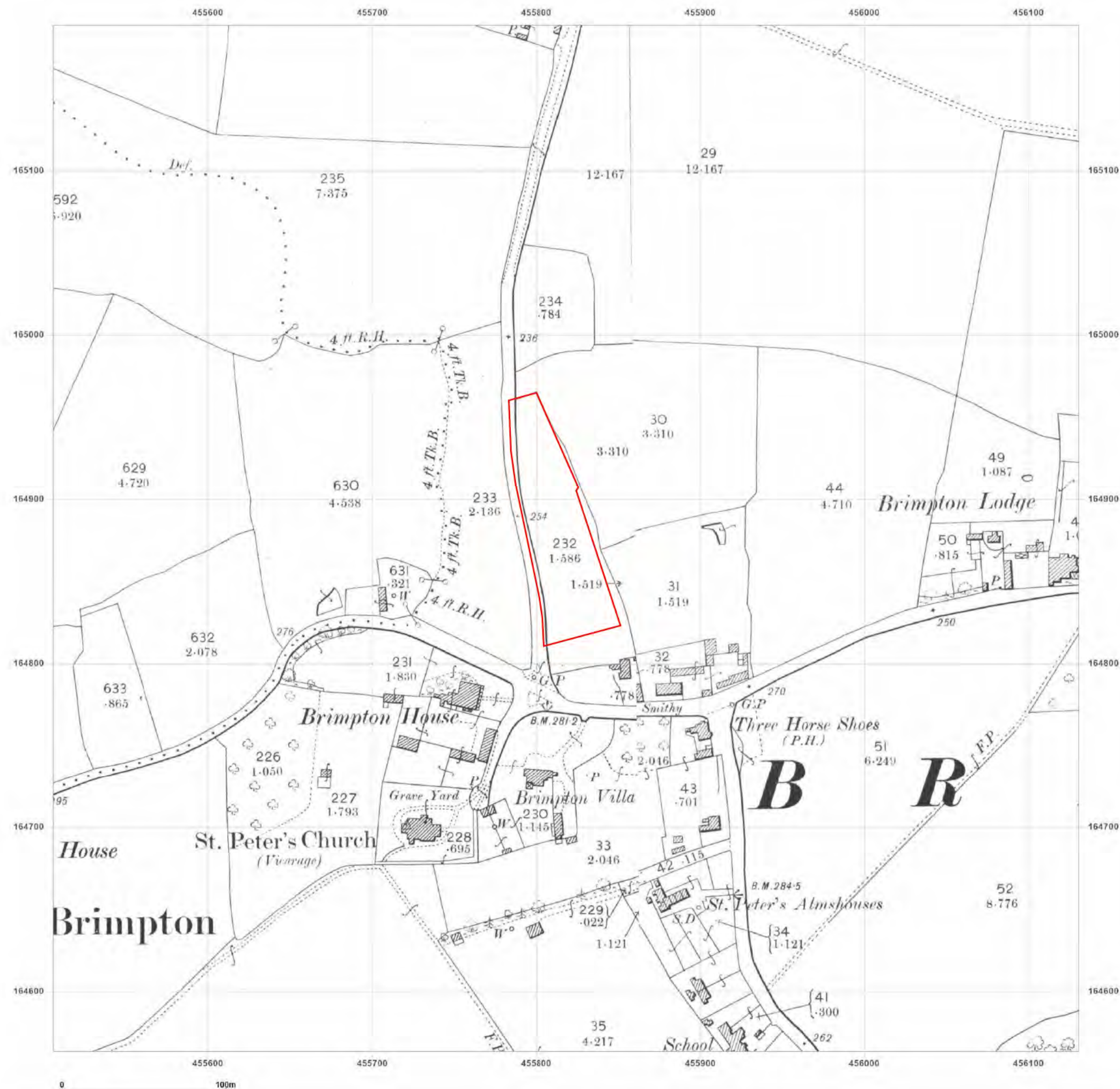
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Figure 3.7:
Ordnance Survey Map, 1900



Site Outline

0m 100m
1:2500@A3



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Figure 3.8:
Ordnance Survey Map, 1911



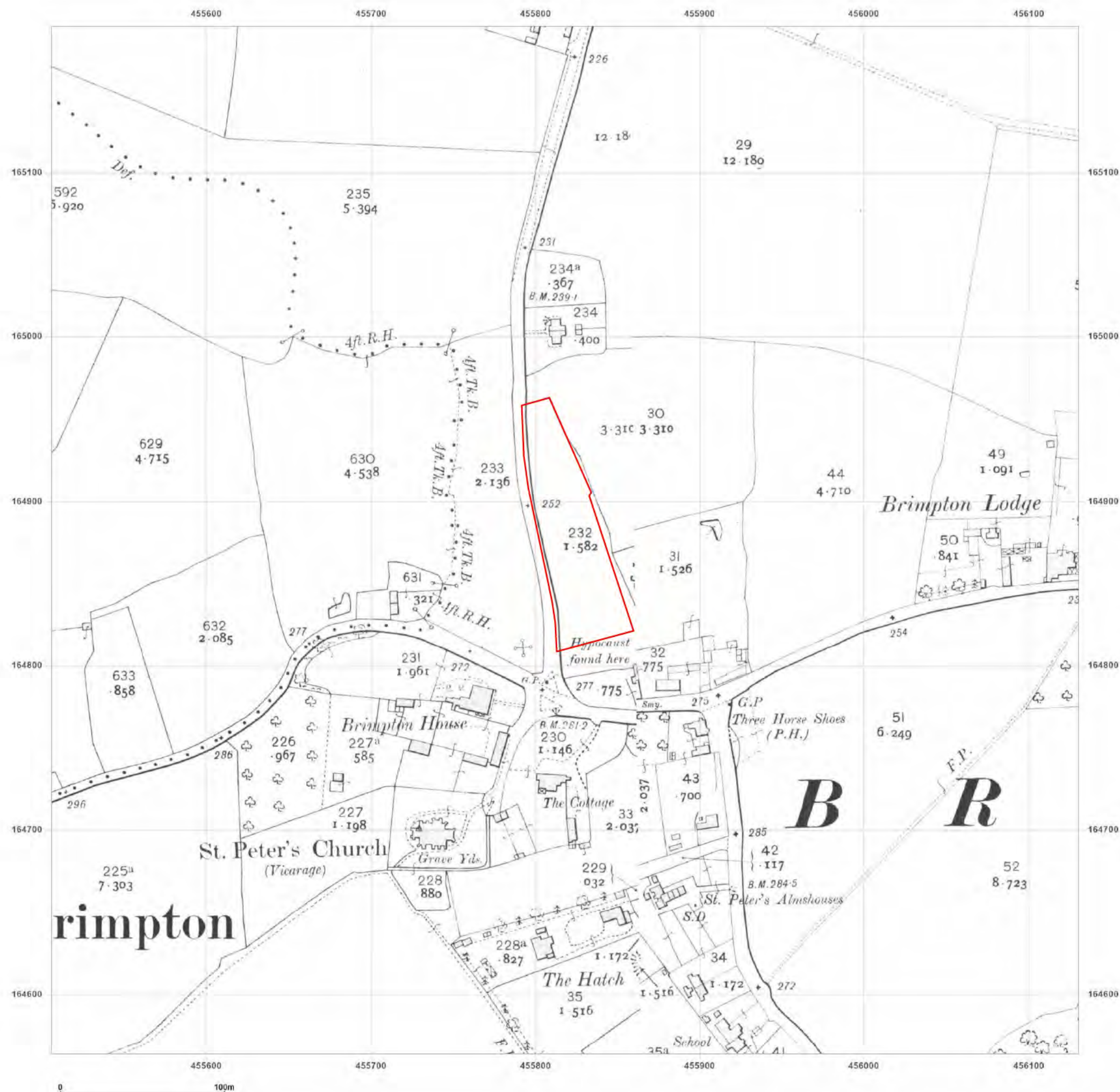
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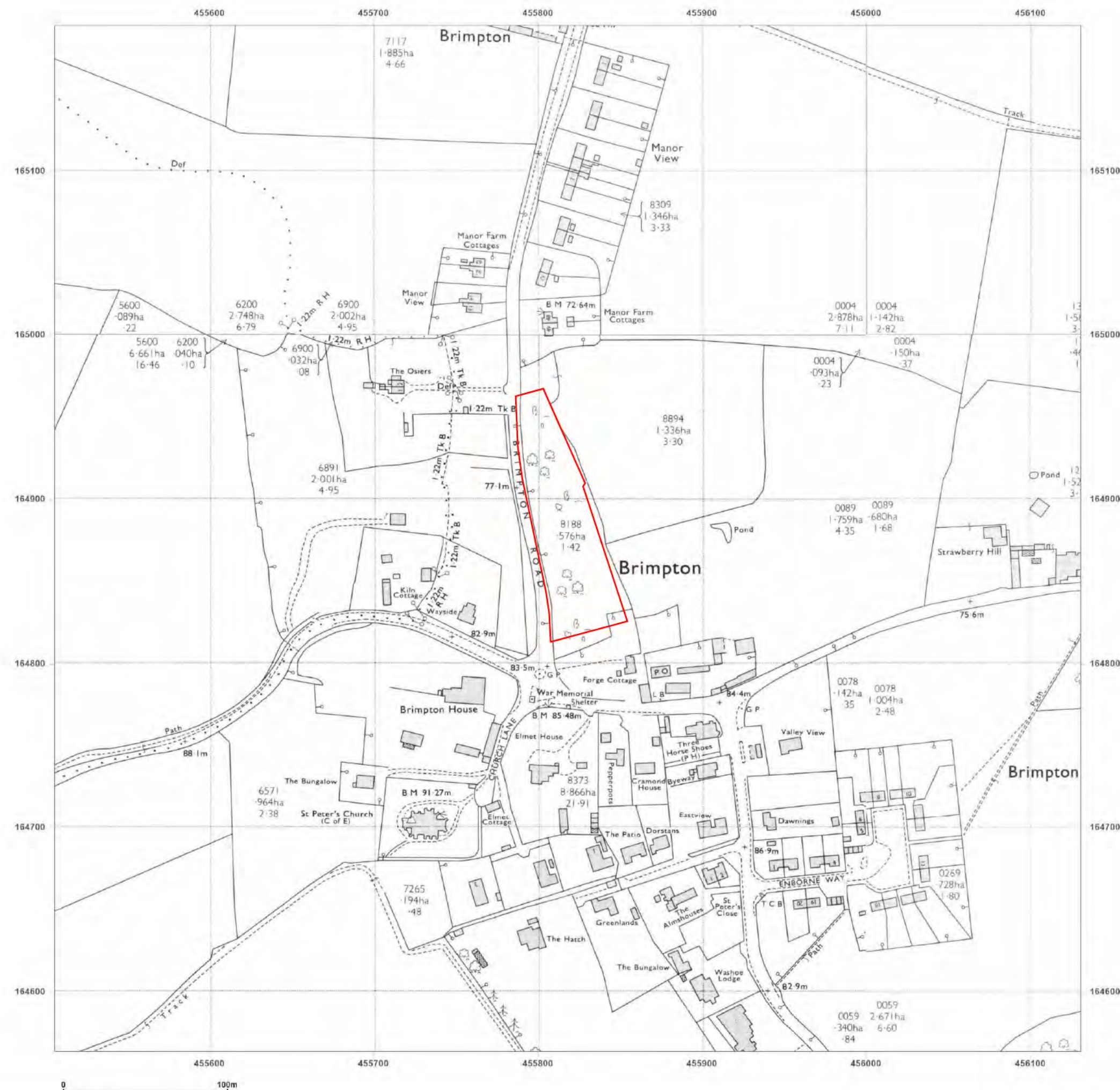
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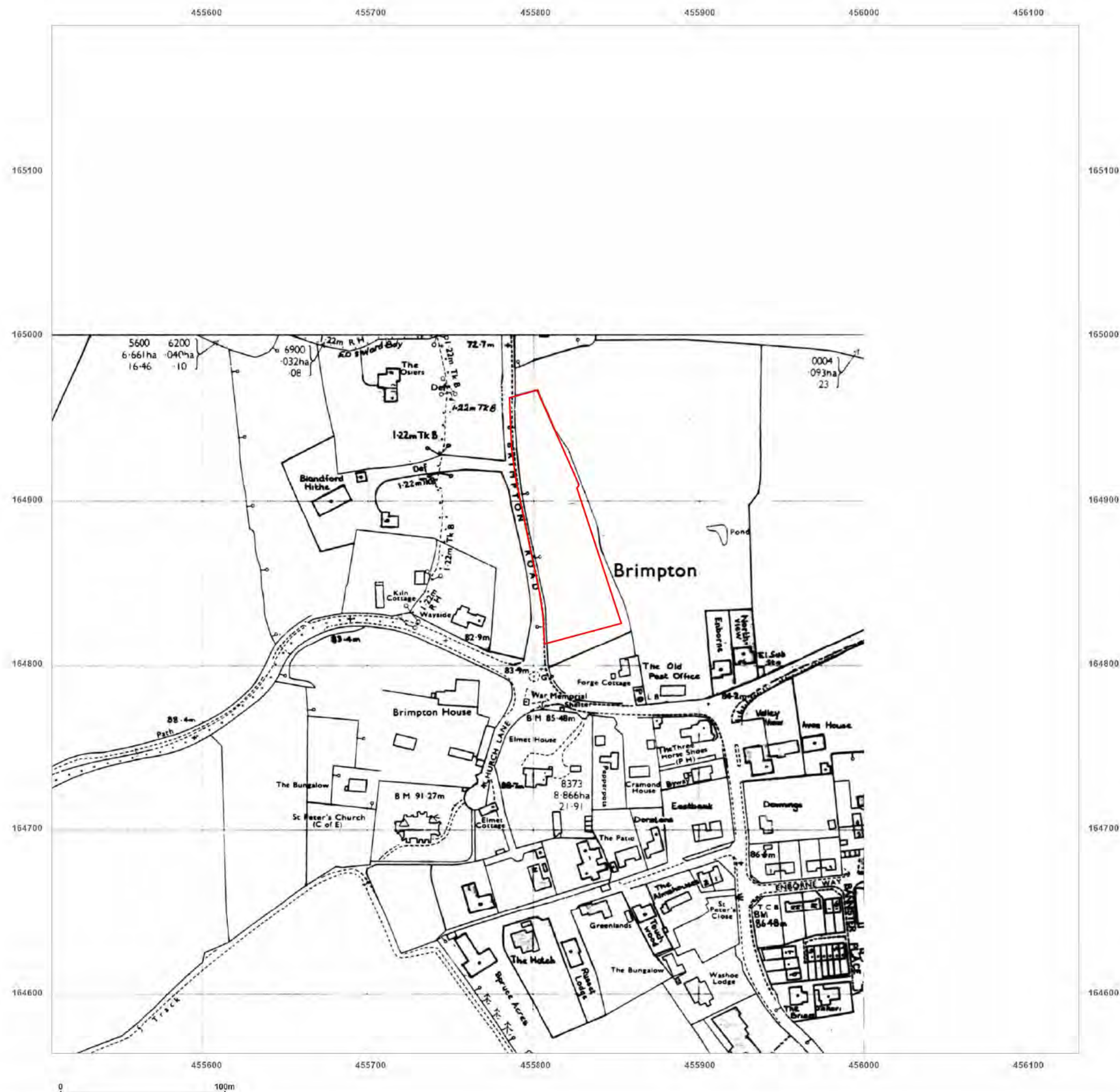
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Date: 20/01/23

Figure 3.11:
Ordnance Survey Map, 1971



Site Outline

0m 100m
1:2500@A3



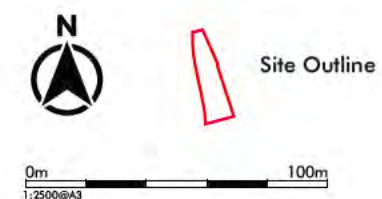
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Figure 3.12:
Ordnance Survey Map, 1993



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Figure 3.13:
Ordnance Survey Map, 2003



Site Outline

0m 50m
1:1250@A3



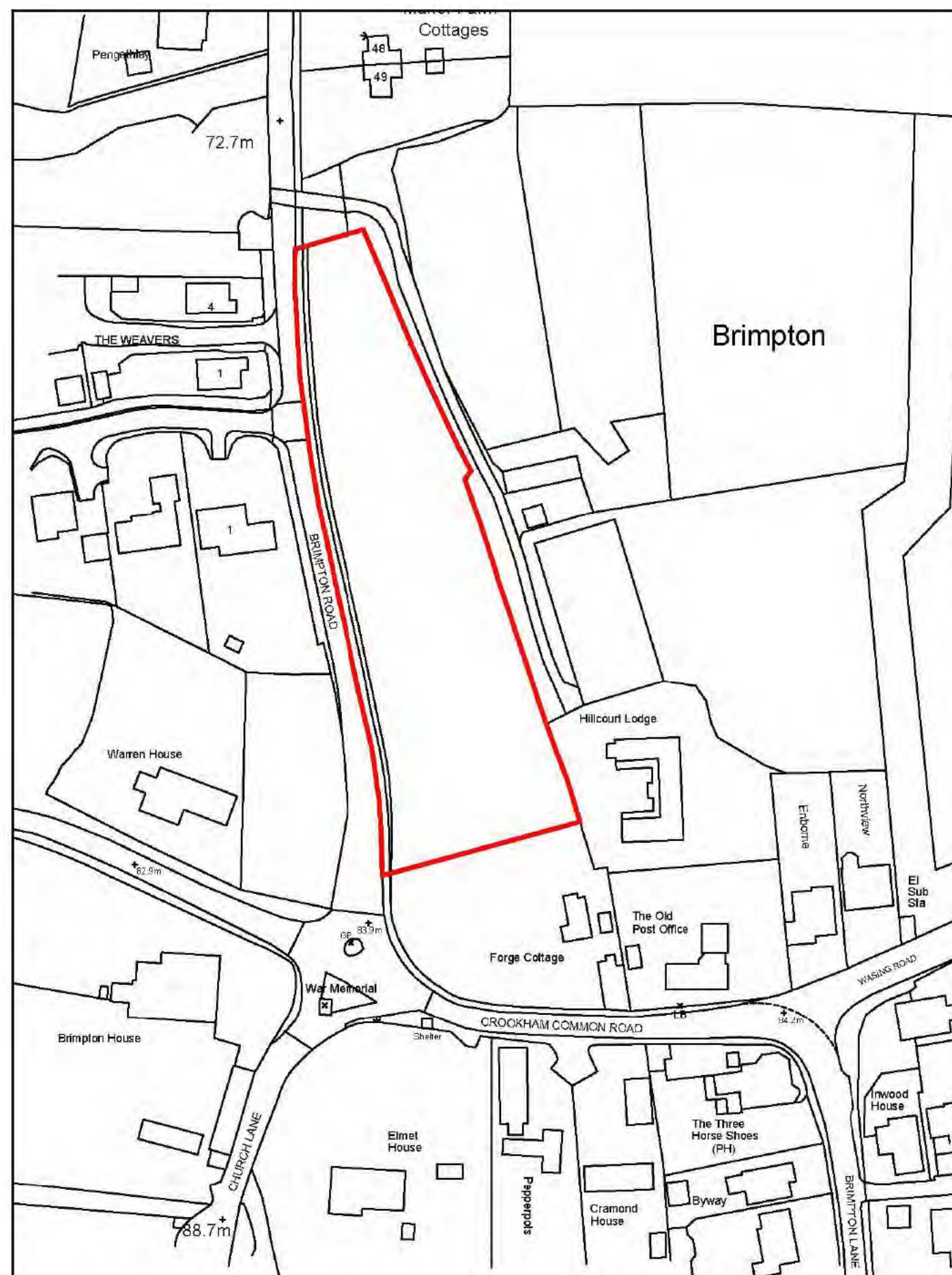
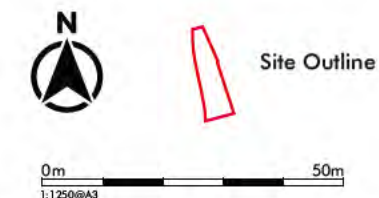
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Figure 3.14:
 Ordnance Survey Map, 2021



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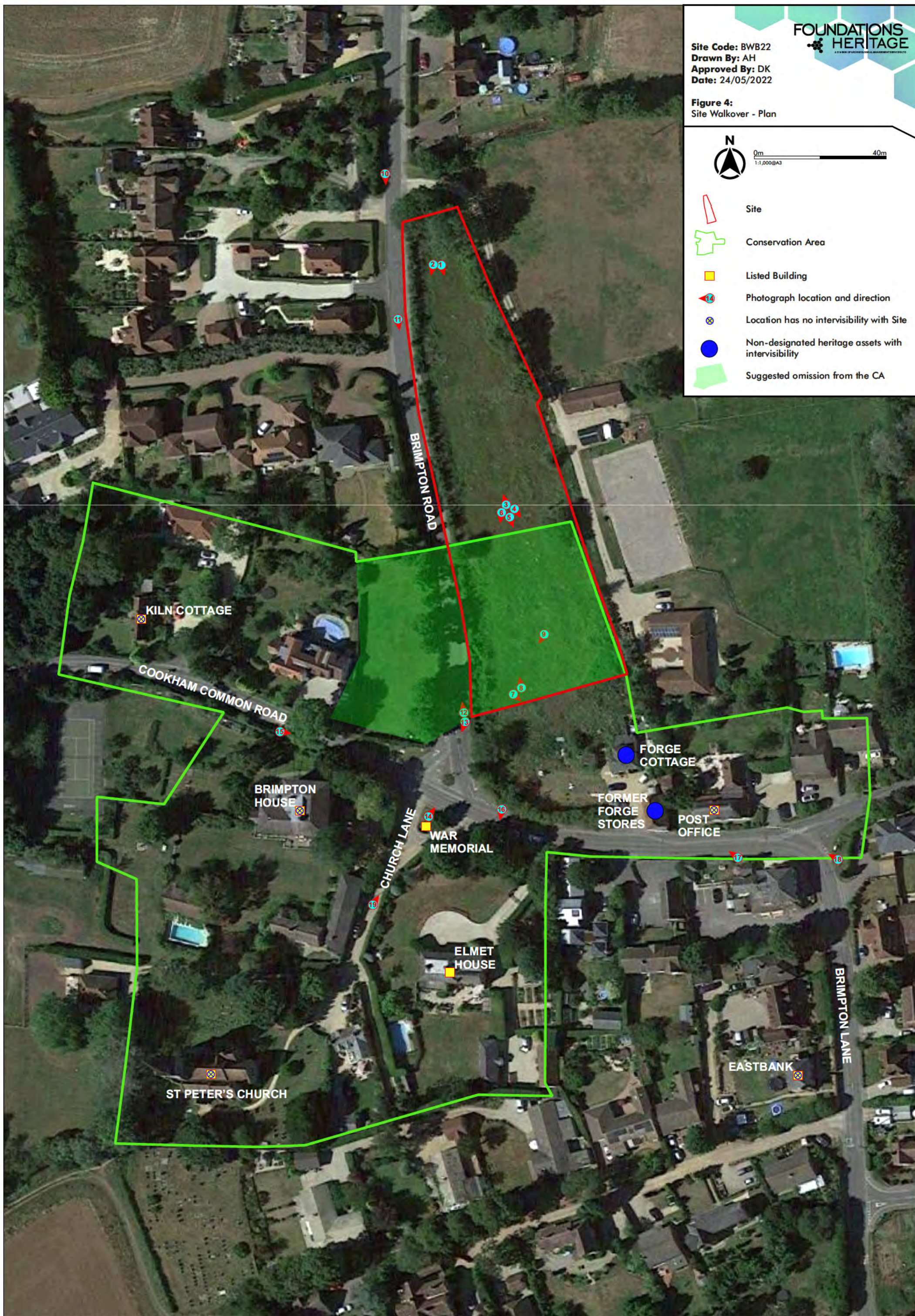
Site Code: BWB22
 Drawn By: AH
 Approved By: DK
 Date: 24/05/2022

Figure 4:
 Site Walkover - Plan



0m 40m
 1:1,000@A3

-  Site
-  Conservation Area
-  Listed Building
-  Photograph location and direction
-  Location has no intervisibility with Site
-  Non-designated heritage assets with intervisibility
-  Suggested omission from the CA





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