


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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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	Mr
First Name:*	Fred	Simon
Last Name:*	Schiff	Packer
Job title (where relevant):		Director
Organisation (where relevant):	Hathor Property	Turley
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*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.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Hathor Property c/o Turley
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	See accompanying representation
Policy:	See accompanying representation
Appendix:	See accompanying representation
Policies Map:	See accompanying representation
Other:	See accompanying representation

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:

See accompanying representation

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		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
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		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

See accompanying representation

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

X

Please give reasons for your answer:

Please refer to accompanying representations

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.

See accompanying representation

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:

Our position is that the site should be included as a proposed residential allocation and that the LPR does not provide enough sites to provide sufficient housing supply.

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	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

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		Date	03.03.23
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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 Proposed Submission (Regulation 19) Consultation

Land at Enborne Street, Newbury

March 2023

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Simon Packer



Client

Hathor Property

Our reference

HATS3001

3 March 2023

1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Hathor Property in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023) (LPR).
- 1.2 Our client has land interest to the south of Enborne Street, Newbury, and adjacent to the existing built up area of Newbury.
- 1.3 We look forward to continuing to engage with the LPR process as it emerges.
- 1.4 These representations are accompanied by the following plans and reports included in the relevant appendices:
 - Site Location Plan;
 - Opportunities and Constraints Plan;
 - Landscape Appraisal;
 - Heritage Appraisal;
 - Transport Note; and
 - Concept Masterplan.

2. Land at Enborne Street, Newbury

The site and surroundings

- 2.1 The site extends to an approximate area of 3.15ha occupying land comprising an agricultural field (see Site Location Plan at **Appendix 1**). There is an existing vehicular access from Enborne Street with associated gates, fencing and parking, which leads to a track extending north-south on the western side of the site and providing access to a courtyard of agricultural buildings.
- 2.2 The site lies on the southern edge of West Berkshire District. The A34 connects Newbury to Oxford to the north, and Winchester to the south. The north-eastern edge of the site is a short distance (circa 30m) from the settlement boundary of Newbury, as identified in the adopted Core Strategy [and retained as such in the LPR]
- 2.3 The site lies approximately 3.5km from Newbury Town Centre. Newbury is the main settlement in the District which has good rail, bus and road connections to Reading, Basingstoke and London. It also includes a mainline railway station, and an extensive range of retail, commercial, education and community facilities.
- 2.4 There is a local centre at Wash Common approximately 1.5km to the north east that provides a range of facilities and services, including a primary school, convenience store, allotments, recreation ground, library and church.
- 2.5 There are bus stops located circa 500m away in the residential area of Wash Common. The bus services 2 and 2a serve Newbury town centre, Newbury Railway Station and Newbury College. The service runs hourly between Monday-Friday and on Saturdays. The number 6 service also connects with the town centre and railway station, but extends north of Newbury and provides a more irregular service every few hours Monday-Friday and on Saturdays.
- 2.6 Enborne Street forms part of the Round Berkshire Cycle Route, a circa 140 mile route broadly around the perimeter of the County.
- 2.7 The site slopes gently from north to south, toward the River Enborne. Established vegetation runs along all boundaries of the site, containing the site. To the north-east of the site, separated from the field by a boundary defined by vegetation, is open land with some clusters of trees, beyond which is the settlement of Newbury. There are detached properties opposite the site on the north side of Enborne Street.
- 2.8 To the east of the site there is deciduous woodland. The land to the west of the site is also woodland, with some former agricultural buildings enclosed within. This land also has a vehicular access off Enborne Street. To the south of the site is agricultural field land, beyond which is a small amount of ribbon-like residential development within Enborne Row, located either side of Washwater road.
- 2.9 To the north of the site, on the opposite side of Enborne Street, are some detached residential properties off the road set in predominantly agricultural land.

- 2.10 The site is not covered by any statutory landscape or ecological designation. The site falls within the Impact Risk Zones of two SSSIs – Redhill Wood circa 2.6km west of the site, and Greenham and Cookham SSSI circa 3km east of the site.
- 2.11 A watercourse runs along the eastern boundary of the site, leading from Enborne Street to a pond close to the southern boundary of the site, however the site lies fully within Flood Zone 1.
- 2.12 The site is classified as Grade 3b agricultural land, which is moderate quality agricultural land.
- 2.13 There are no listed buildings within or immediately adjacent to the site. The closest listed buildings to the site is circa 580m south of the site (Mill at Falkland Farm, Grade II Listed). The site does not lie within a Conservation Area.
- 2.14 A Registered Battlefield (Battle of Newbury 1643) lies on the northern side of Enborne Street, opposite the site, extending north adjacent to the built-up area of Newbury.
- 2.15 There are no Public Rights of Way within the site. Route number ENBO/9/3 runs from Enborne Street a short distance to the west of the site, through the adjacent woodland to Enborne Row settlement to the south of the site.
- 2.16 The land is under single ownership and is controlled by Hathor Property who are committed to bringing forward residential development on the site following an allocation through the LPR process.
- 2.17 New development here on any scale will need to be respectful and responsive to its context, aware of the need to maximise use of development land but protecting the special character of the surroundings. The proposals for the site have been developed in this context.
- 2.18 There is a Class Q approval for change of use from agricultural to residential on the site to the south east (application reference 21/03177/PACOU, approved 15th February 2022). This consent has been implemented and is due to be completed in May 2023.
- 2.19 To the south of the Site an application for a solar photovoltaic farm has been submitted to WBC (application reference 22/00101/COMIND). This is currently awaiting determination. There are no other relevant planning applications for the site or its surroundings.

Technical Studies

- 2.20 A series of technical studies have been undertaken to inform the emerging proposals for the site and support its allocation for residential development. These studies are summarised below.

Landscape and Visual

- 2.21 A Preliminary Landscape and Visual Appraisal has been prepared by LVIA Ltd (February 2023) and is included at **Appendix 2**. Ten viewpoints were selected to represent a variety of receptors in the surrounding area, all of which were chosen from publicly accessible vantage points. The Zone of Theoretical Visibility was set 2.5km from the site.

- 2.22 The Appraisal considers the overall sensitivity of the landscape is considered to be medium. The proposal would be consistent with the current landscape character of the site and its surrounding context. With a successful mitigation strategy, the proposal would further integrate with its setting.
- 2.23 The construction phase will give rise to temporary, short term impacts. The overall weighted level of landscape effect can be considered moderate (i.e. not a material change).
- 2.24 The viewpoints demonstrate that the visibility of the site is quite limited. The visual impact and the significance of the impacts of the development on the open countryside have been assessed as potentially major/moderate (i.e. a material change) without mitigation from viewpoint 1 at the proposed site access. Change is very limited in its geographic extent due to the surrounding vegetation, landform and built form. The visual effects are minimal due in most part to mature vegetation between the receptor and the site, the topography in the area and similar setting of the proposed scheme.
- 2.25 Mitigation measures have been identified that can be embedded into development of the site to further reduce the identified impacts. These comprises:
- Retention and management of the existing boundary vegetation;
 - Additional ornamental planting;
 - Heights of built form to reflect that of its surroundings;
 - Built form set back from boundaries to allow growth of boundary vegetation;
 - External lighting to be design in line with best practice to minimise potential for light spill;
 - Use of external building materials which minimise potential visual intrusion and follow the local vernacular to aid visual blending.
- 2.26 With the above mitigation measures, the development will have a moderate visual impact and a minor character impact (i.e. not a material change). It therefore is considered can be satisfactorily integrated into the landscape.

Heritage and Archaeology

- 2.27 A Heritage and Archaeology Statement has been prepared by Ridgeway Heritage Consultancy (February 2023) and is included at **Appendix 3**.
- 2.28 The site is located south of the of the southernmost section of the Registered site of the First Battle of Newbury, of 1643. The setting of the designated battlefield has been greatly compromised by modern development on its eastern side.
- 2.29 The Site and the designated battlefield display contrasting landscape characters, and a limited spatial and visual relationship, which is represented by a narrow frontage on the

northern edge of the Site. Inter-visibility between the Site and a small number of distant Grade II-listed buildings is obstructed by intervening land-forms and vegetation.

- 2.30 The site has low potential for archaeological finds and features, with the possible exception of objects relating to the 1643 battle.
- 2.31 The proposed development would result in minimal harm to the setting and significance of the adjacent battlefield site and of any other heritage assets, surmounting to the lower end of less than substantial harm. In accordance with the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraphs of 194, 195, 197 and 202 of the National Planning Policy Framework (NPPF) (Note: these are primarily applicable to determining planning applications but are a useful benchmark) , this less than substantial harm is significant.
- 2.32 It requires a balancing exercise to be undertaken assessing the extent of any harm against the public benefits delivered by the Proposed Development, as part of the overall planning balance. In this instance the level of harm associated with a future allocation is less significant and would be more than outweighed by the benefits of the proposals in meeting market and affordable housing needs.

Transport

- 2.33 A Technical Note has been prepared by PEP to consider the sustainability of the site, suitability of vehicular access onto Enborne Street and capacity of the road network to accommodate development, and is included at **Appendix 4**.
- 2.34 The site would be accessible by non-car means of travel to the local area and to Newbury town centre (as discussed in paragraph 2.1 – 2.6 above). A suitable access with appropriate visibility splays can be provided off Enborne Street.
- 2.35 Up to 70 dwellings would produce around one vehicle movement every two minutes, which is a low level of traffic generation and would not affect existing traffic or safety conditions on Enborne Street.
- 2.36 From a sustainable transport and highways perspective, development of the site for up to 70 dwellings would be acceptable. There would be no severe impact in line with the NPPF (2021).

The Proposed Development

- 2.37 The technical studies indicate the site could accommodate up to 70 dwellings. An Illustrative Masterplan indicating how the site could be developed is attached at **Appendix 6**.
- 2.38 The Illustrative Masterplan has been guided by the following factors:
- Retention of boundary vegetation for visual screening;
 - Topography and views into the site;
 - Consideration of nearby heritage assets; and
 - Achieving safe and suitable access into the site from Enborne Street.

- 2.39 The accompanying Constraints and Opportunities plan at **Appendix 5** illustrates that there are no overriding constraints within the site boundary. The site comprises an open field with established vegetation boundary. On the south west edge of the field there are agricultural buildings, one of which has Class Q approval for conversion to a dwelling (Use Class C3). This area will be maintained as existing.
- 2.40 The Illustrative Masterplan illustrates how development of the site has been led by the landscape and heritage considerations, providing areas of green open space, part of which acts as SuDS features, and an equipped play space.
- 2.41 Development parcels have been given sufficient buffers to boundary vegetation on all sides. A set back from Enborne Street is provided, in response to heritage comments. A 5m planting buffer is proposed between the development parcel and the road.
- 2.42 A new vehicular access is proposed from Enborne Street. A main street with several secondary streets will serve the development parcels.
- 2.43 Pedestrian links can be provided connecting the existing PRoW from the west of the site (ref. ENBO/9/3), to continue through the site, with potential to connect to the north east toward Wash Common. A new 1.8m footpath is proposed at the northern side of the proposed access, to run along the eastern side of Enborne Street to connect to the existing footway at The Grange junction. This would connect the site to the existing footpath network.
- 2.44 On-site provision of equipped play space can be accommodated within the site, alongside a policy compliant level of public open space. SUDS features can also be located on-site.
- 2.45 The framework has been drafted according to the following assumptions:
- The proposed housing mix will respond to local housing need and include a range of 2, 3 and 4 bedroom homes and include provision of policy compliant level of affordable housing.
 - Housing will be 2 storey with potential for 2 ½ storey in key locations.
 - Detail with regards to materials, planting etc. will be dealt with at the application stages of the planning process, although design detail will seek to reflect the locality.
 - Priority will be given to ensuring a bio-diversity net gain of at least 10%
- 2.46 We consider that the development of the site would secure the following benefits:
- **Housing Need** - the site is capable of delivering up to 70 high quality homes,. This will assist in the delivery of new market and affordable housing that is capable of addressing local need in terms of type and tenure. The site can be brought forward for development quickly and is capable of making an important contribution towards the immediate housing needs of the District during the early years of the LPR period.

- **Housing Mix and Choice** – the site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community.
- **Open Space** - any new residential development will provide a strong landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure.
- **Promoting Healthy Communities** - the site is in an ideal location for residential development, immediately adjacent to the most sustainable settlement in the District and in close proximity to existing retail, education and community facilities and services within Wash Common. These facilities are accessible by foot, and beyond this Newbury Town Centre and railway station are accessible via cycling or public transport. The railway station provides access to key locations such as Reading, Basingstoke and London.
- **Economy** – the proposed development will provide a boost to the local economy during construction and subsequent occupation.

3. Regulation 19 Proposed Submission

Soundness of the Regulation 19 Consultation

- 3.1 The decision to take forward the Proposed Submission Regulation 19 LPR to consultation took place at a Full Council meeting in December 2022, yet the HELAA report containing the assessment of all sites was not published until January 2023. This means that Full Council made a decision to take forward the Proposed Submission LPA including proposed site allocations, without having had sight of the updated HELAA (2023). The HELAA that would have been available at the time of the Full Council meeting was dated December 2020.
- 3.2 Hathor Property therefore question the soundness of the proposed allocations, in the absence of Members having access to the full evidence base for the site selections when taking the decision to proceed with the Regulation 19 consultation.

Local Plan Period

- 3.3 NPPF (2021) paragraph 22 requires strategic policies should look ahead over a minimum 15 year period from adoption (our underlining). The proposed LPR period runs to 2038/39 which will mean that the LPR would need to be adopted in 2023/24 if it is to be consistent with the NPPF.
- 3.4 However, given the need to allow for formal submission and Examination, and any preliminary matters the Inspector may want to review, and subsequent modifications, it is highly unlikely the LPR will be adopted a year from now. Therefore, in order to ensure the plan period is consistent with national policy then an extra year should be added with the plan period ending in 2039/40.

Duty-to-Cooperate

- 3.5 At paragraph 6.5 of the LPR reference is made to the unmet housing need of 230 dwellings as identified within the Reading Local Plan period to 2036. However, no mention is made as to how this unmet need will be met with the statement of common ground between the Local Planning Authorities, only stating that this will be met within the West of Berkshire HMA
- 3.6 The NPPF is clear at paragraph 61 that the unmet needs of neighbouring area must be taken into account when establishing the number of homes to be planned for. Given that the Bracknell Forest Local Plan, that has recently been through its examination in public, has not included any additional supply to address the shortfall in Reading it falls to either Wokingham or West Berkshire to include it within their housing requirement. The Council has had a number of years to ensure this relatively small amount of additional supply is addressed and it should have been included either wholly or in part within the Council's housing requirements.
- 3.7 Conversely, the Council are looking to push back the delivery of these homes. The Housing Background Paper states at paragraph 2.24 that distribution of unmet needs will be done through a local plan review before the need arises. However, Planning

Practice Guidance (PPG) states that “*Inspectors will expect to see that strategic policy making authorities have addressed key strategic matters through effective joint working, and not deferred them to subsequent plan updates ...*”.

- 3.8 The unmet need should be addressed in this LPR. This unmet need is likely to be exacerbated, given the physical constraints faced by Reading it is unlikely that a review will address these needs in future. It is more likely that unmet housing needs in Reading will grow and will need to be addressed in West Berkshire and the other authorities surrounding Reading.

Housing Requirement

- 3.9 **Policy SP12** confirms that provision will be made for 8,721 to 9,146 net additional homes in West Berkshire for the period 1 April 2022 to 31 March 2039; 513 to 538 dwellings per annum.
- 3.10 The provision of a range is misleading and confusing. In accordance with paragraph 61 of the NPPF, the current standard method calculation requires provision of a minimum of 513 dwellings in the plan period (unless exceptional circumstances apply – these are not relevant to West Berkshire), and para 74 of the NPPF requires an additional 5% buffer to ensure choice and competition in the market. This equates to 538.65 dwellings.
- 3.11 This should be the minimum starting point for provision of housing. This is implied in the Policy, with reference to the ‘*target figure of 538 dwellings per annum does not constitute a ceiling or cap to development*’. Strictly speaking, the figure should be rounded up to 539 dwellings.

Affordable housing

- 3.12 The local housing needs assessment (LHNA) and application of the Standard Method is the starting point and that there may be circumstances where the Council must plan for a higher level of housing needs. Paragraph 2a-024 of PPG advises that ‘*an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*’.
- 3.13 The Council’s evidence indicates that there is a need for at least 330 affordable and social rented homes per annum. This is roughly 60% of the Council’s housing requirement. The principal mechanism for the delivery of affordable homes will be through allocation of sites for market housing. There is justification for adopting a higher housing requirement on this basis and a related identification of additional housing sites in suitable locations.

Local Plan Review Strategy

- 3.14 **Policy SP1 ‘Spatial Strategy’** sets out three spatial areas within the district where development will be focussed. Newbury is identified as a focus for housing development, recognising its ‘*key role as the administrative centre and major town*’

centre for the District.' The principle of this approach is supported, given it provides the greatest opportunities of delivering sustainable development.

- 3.15 **Policy SP3 'Settlement Hierarchy'** reiterates the focus of development on the settlement hierarchy which takes account of the function and sustainability of settlements across the District and promotes sustainable communities. Specific reference is made to the *'scale of development proposals will be expected to be relative to the existing or proposed level of facilities and services in the settlement, together with their accessibility.'* Again, the principle of this approach is supported.
- 3.16 The LPR proposals for providing new development at Newbury are focussed on the long-standing allocation at Sandlesford Park, on greenfield land to the south of Newbury in accordance with **Policy SP16**. In addition, smaller scale developments will include redevelopment of previously developed land. There are no additional greenfield allocations put forward.
- 3.17 Councils are required to maintain a five year supply of housing land, and more specifically, in accordance with paragraph 68 of the NPPF policies should identify *'a supply of (a) specific, deliverable sites for years 1 to 5 of the plan period'*.
- 3.18 The deliverability of allocated sites are key to ensuring sites are coming forward as anticipated. There is currently an over-reliance on sites that have not delivered and are therefore retained allocations from the current Core Strategy, or large strategic sites where delivery is likely to be slow, to meet housing needs, particularly in the short-term.
- 3.19 There are alternative available and deliverable sites adjacent to Newbury that should be considered in the selection of proposed residential allocations to meet the identified housing need in the short to medium term. The planning merits of the Site at Enborne Street, Newbury are considered in Section 2 of these representations.
- 3.20 The Spatial Strategy recognises that the allocation of greenfield sites is required alongside brownfield development in order to maintain a five year supply of housing land.
- 3.21 The Council's housing supply position as of 31st March 2022 takes into account the Core Strategy Sandlesford Park Strategic Site amongst other sites allocated in the current Plan period, some of which are not being taken forward as proposed allocations as they are at an advanced stage of construction, and existing planning commitments on unallocated sites.
- 3.22 This totals 7,337 dwellings. The annual requirement of 538 new dwellings results in an additional need of 1,809 dwellings. As outlined above, Policy SP12 acknowledges that the 538 dwellings are not a ceiling nor a cap. There is no specific housing need identified for Newbury within the housing figures.

Sustainability Appraisal

- 3.23 Table 11 of the Sustainability Appraisal / Strategic Environmental Assessment considers the merits of different strategic options for delivering the necessary growth to meet development needs during the LPR period.
- 3.24 There is little evidence to justify why the particular options have been selected. Having identified that Newbury offers the greatest potential for sustainable development, there is a specific option that focusses development on Newbury. It is concluded that:
- “This option gives a number of potentially positive sustainability effects in relation to focusing development on the biggest town with the largest number of facilities, with a significantly positive effect predicted due to the strategies’ focus on the use of brownfield and. However, there are is an unknown impact as to whether the strategy would be able deliver adequate housing to meet the local identified need due to the lack of suitable sites within the area.” A reliance on focusing development in Newbury may not deliver the number of dwellings required to meet the local need.”*
- 3.25 The conclusion is that:
- “Further largescale development opportunities are more limited, although there are opportunities for redevelopment within the settlement boundary and on brownfield sites.”*
- 3.26 Appendix 4 provides a more detailed scoring assessment of this option and a useful comparison with the option focussing on strategic growth in Thatcham (the ‘preferred option’). Whilst it is recognised that strategic growth in Thatcham does offer the potential to secure related infrastructure, facilities and services alongside residential development, a suitable balance does need to be made with the greater level of existing facilities and services, and opportunities to use alternatives to the private car, that exist both within the settlement but also around Newbury.
- 3.27 It is unreasonable to score this option less positively than the preferred option of strategic growth at Thatcham when, for example, opportunities for reducing impacts on climate change or deliver development in sustainable locations are more likely to be positive in the short term. Scoring this option negatively on the basis of a *‘limited number of smaller site options’* is not appropriate.
- 3.28 In addition, if confirmed, the strategic allocation will inevitably take some time to deliver housing, as evidenced by the large timescales associated with the allocation at Sandford Park. It is highly unlikely that any delivery will come forward within the first five years of the LPR period, and potentially significantly longer.
- 3.29 To this effect, an alternative option that explored a focus on both Newbury and Thatcham, with reduced growth in the AONB villages and Eastern Area, may well have been more appropriate. This would have provided a better balance in delivering sustainable development throughout the LPR period.

Delivery of Proposed residential site allocations

- 3.30 It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been ‘carried over’ from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.
- 3.31 Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below, along with a review of their current planning status.

Retained allocation from Core Strategy	Planning status
<p>Sandleford Park, Newbury (Policy SP16) This is a site allocation being carried forward from the current adopted Core Strategy for approximately 1,500 dwellings (current policy CS3).</p>	<p>Planning applications have been submitted to the Council however the site does not yet benefit from full planning permission. A large part of the site benefits from outline consent for 1,000 dwellings (submitted by Bloor Homes and Sandleford Farm Partnership, application reference 20/01238/OUTMAJ, allowed at appeal in May 2022 (ref. APP/W0340/W/20/3265460)).</p> <p>The remainder of the allocation is under different land ownership and has not yet come forward under a new planning application.</p> <p>1,580 homes have been counted for in the Council’s housing supply position at 31st March 2022. It is unclear from the Council’s Annual Monitoring Report 2022 and Five Year Housing Land Supply 2022 statements how many dwellings arising from the Sandleford allocation are anticipated to be delivered within the 5 year period.</p> <p>The AMR does acknowledge <i>“the timing of delivery is likely to be largely in the period post 2026”</i>.</p>
<p>Land north of Newbury College, Monks Lane, Newbury (site ref. HSA 1) This is a site allocation being carried over from the Housing Site Allocations DPD (adopted 2017) for approximately 15 dwellings.</p>	<p>The site benefits from outline permission (application reference 19/00669/OUTMAJ) for 16 dwellings dated August 2019, and reserved matters approval dated January 2021 (application reference 20/00346/RESMAJ).</p> <p>The AMR 2022 states that there is a delay in development due to a revised scheme</p>

	incorporating additional land and increased number of dwellings.
Land at Coley Farm, Stoney Lane, Newbury (site ref. HSA 3) This is a site allocation being carried over from the Housing Site Allocations DPD (adopted at 2017) for approximately 75 dwellings.	A full application has been approved in June 2021 (application reference 20/00604/FULEXT). A review of WBC's online application search demonstrates that several discharge of condition applications have been approved. From a review of Google maps, no development has commenced on site.
Land between A340 and The Green, Theale 100 dwellings	Outline application 17/02904/OUTMAJ for up to 104 dwellings approved December 2020. No reserved matters application submitted and the outline permission will lapse imminently. The lack of delivery at this site has been subject to much discussion, and its ability to be brought forward continues to be subject to debate.
Land adjoining Lynch Lane, Lambourn 60 dwellings	No planning application submitted at the current time.

3.32 Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.

3.33 The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.

Policy SP17 North-East Thatcham strategic allocation

3.34 The strategic allocation of 1,500 dwellings for North-East Thatcham as set out in Policy SP17, is a reduction of 1,000 dwellings relative to that put forward in the Regulation 18 Plan consultation. Table 30 of the SA/SEA concludes that :

“This option was originally to be taken forward and was included in the Reg 18 consultation. Despite providing a considerable number of new homes and community infrastructure to support these homes and the wider Thatcham community the potential impact the local community is considered too high, and politically a reduced number on

the site is considered to be more acceptable. Therefore, this option will no longer be taken forward.”

“This option was considered in light of the responses received to the Reg 18 consultation, which largely considered that 2,500 dwellings in Thatcham was too many. In response, the council has considered a reduced number of dwellings, which still enables a strategic level of development which can provide onsite community facilities. It is noted, that compared to a higher number of dwellings, this option may not deliver all of the education provision originally envisaged on the site, or the additional improvements to community infrastructure within Thatcham. However, a reduced number on the site is considered to be more appropriate.”

- 3.35 Therefore, whilst it is still acknowledged that the scale of the development proposed does offer the opportunity of providing some infrastructure, the Council have conceded level of infrastructure has been reduced, and therefore the extent of the sustainability advantages it could provide have been watered down.
- 3.36 The allocation, if confirmed, will obviously require a detailed planning application with related detailed Masterplanning work, to be submitted and approved, as well significant infrastructure to be developed, before any dwellings can be constructed. It is clear that if confirmed the allocation will not be delivered within the short-medium term of the LPR period.

Summary of Implications for meeting Housing Needs

- 3.37 It is considered the LPR does not propose sufficient sites that can come forward in the short to medium term to ensure sufficient housing delivery in the first five years of the LPR. In order to provide a more robust five-year land supply in the early years of the LPR it will be important for the Council to revisit its land supply and seek to include more small and medium sized sites that will deliver earlier in the LPR period.
- 3.38 The allocation of the site at Enborne Street for up to 70 dwellings is ideally located to fulfil this role.

4. Comment on DM policies

- 4.1 Policy SP5 'Responding to Climate Change – we support the general aim of this policy, however the wording should require conformity with Building Regulations in force at the time of development coming forward due to the period of time covered by the LPR period. There is vagueness within the policy relating to the viability of energy efficiency levels. This provides uncertainty for developers and should be re-worded.
- 4.2 Policy DM44 'Parking' – we object to the wording of this policy in that it excludes garages from being counted toward parking provision on residential sites. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. Discounting garages as parking spaces will result in the ineffective use of land, contrary to the NPPF.

5. Summary and Conclusions

- 5.1 These representations have been prepared by Turley on behalf of Hathor Property in respect of the West Berkshire Local Plan Review 2039 Proposed Submission (Regulation 19) Consultation (January 2023).
- 5.2 The LPR does not identify sufficient housing to meet identified needs, nor is their sufficient flexibility should circumstances change. The plan period should be extended by a year, and some provision for meeting the unmet needs of Reading should be factored in.
- 5.3 Equally significantly, even assuming that the planned housing provision within the LPR was appropriate, there is considerable doubt that the LPR will provide for a sufficient supply of housing in the first five years of the LPR period.
- 5.4 The scale of the strategic allocation at North-East Thatcham is acknowledged as providing the potential for securing infrastructure and facilities alongside development. However, this is unlikely deliver any housing in the short-medium term, and certainly within the five year period. Equally, the Council have carried forward long -standing allocations from the previous adopted Core Strategy and there remains significant uncertainty about their deliverability, again especially within the first five years of the LPR.
- 5.5 Newbury is the largest settlement in the District and is able to support residential growth to provide the housing needs in a sustainable location. The strategy set out in the LPR gives insufficient weight to the ability to meet key sustainability objectives from greenfield sites adjacent to Newbury.
- 5.6 Land at Enborne Street, Newbury is a sustainable and deliverable site under single ownership. The accompanying Transport note, Heritage Assessment and Landscape and Visual Assessments confirm that the proposals can be accommodated without adverse impact on highway safety, and will have no adverse effect on heritage assets or the wider landscape. There are no other identified technical barriers to development of the site.
- 5.7 The Illustrative Masterplan demonstrates how proposals could be provided on site to further minimise these impacts and deliver a well-designed scheme that retains boundary hedging and woodland and provides suitable open space, equipped play space, and connectivity with the surrounding rights of way and footways along Enborne Street to connect to Wash Common/Newbury. It would provide a logical extension to the existing settlement.
- 5.8 It is considered Land at Enborne Street, Newbury should be considered as a residential site allocation to support housing delivery in the District.
- 5.9 Hathor Property look forward to working with the Council throughout the LPR process.

Appendix 1: Site Location Plan

Appendix 2: Landscape and Visual Impact Assessment

Appendix 3: Heritage and Archaeology Assessment

Appendix 4: Highway Note and Access Plan

Appendix 5: Constraints and Opportunities Plan

Appendix 6: Illustrative Framework Plan

Appendix 7: SA site scoring

Key effects of options on the SA/Objectives

++	+	?	0	-	--
Significantly Positive	Positive	Uncertain	Neutral	Negative	Significantly Negative

SA Objective	Our score	Comments
9(a) To reduce West Berkshire's contribution to greenhouse gas emissions		The site layout will be designed to meet Building Regulations in terms of high energy efficiency and carbon reduction during construction and the lifetime of the development, above and beyond BREEAM requirements.
9(b) To sustainably manage flood risk to people, property and the environment		As a minimum, the site will not increase flood risk on-site or in adjacent areas. A detailed Flood Risk Assessment and Drainage Strategy will need to be undertaken to confirm whether there will be a positive impact.
1(a) To maximise the provision of affordable housing to meet identified need		The site will help to deliver housing to meet identified needs therefore this is a positive impact.
1(b) To enable provision of housing to meet all sectors of the community, including those with specialist requirements		The site will help to deliver housing to meet identified needs therefore this is a positive impact.
2(a) To support healthy, active lifestyles		The site is likely to have a positive impact on healthy, active lifestyles as the site is close to local services and facilities that are within walking or cycling distance.
2(b) To reduce levels and fear of crime and anti-social behaviour		The proposed development can incorporate good design and secure by design principles, to reduce fear of crime and antisocial behaviour. This will be a positive impact.
2(c) To enable the protection and enhancement of high quality multi-functional GI across the District		The proposed development can accommodate a high-quality provision of GI on-site, providing a range of benefits. This will be a positive impact.
3(a) To improve access to education, health and other services		The site is likely to have a positive impact on access to community facilities as it is well located for services and facilities, including education and employment facilities. The site is adjacent the main settlement in the District.

<p>3(b) To support the development of access to IT facilities including Broadband particularly in rural locations</p>		<p>The site can be fully serviced and is located at the main settlement in the District.</p>
<p>4(a) To reduce accidents and improve safety</p>		<p>The Transport Appraisal undertaken that access can be achieved off Enborne Street into the site through land controlled by the promoter and the public highway. The access can achieve local and national standards in terms of geometry, capacity, safety and visibility.</p> <p>Trip generation from the proposed development and capacity of the local highway network would be considered as part of a future Transport Assessment.</p>
<p>4(b) To increase opportunities for walking, cycling and use of public transport</p>		<p>The site is close to local walking links into Newbury town centre, with opportunities to cycle also. There is a local bus service to Newbury town centre, Newbury Railway Station and Newbury College.</p>
<p>5(a) To conserve and enhance the biodiversity and geodiversity of West Berkshire</p>		<p>The site has not been assessed for ecological potential, however the nature of the site as an open field is likely to preclude the possibility of important habitats being present on site. There are no TPO trees on the site.</p> <p>The scheme has the potential to deliver a 10% biodiversity net gain on-site.</p>
<p>5(b) To conserve and enhance the character of the landscape</p>		<p>A well-designed scheme and on-site mitigation measures will not result in a negative impact on the character of the landscape.</p> <p>Development will be separated from the boundaries of the site by landscape planting buffers.</p> <p>The potential for adverse effects can be moderated by retention of distinctive landscape features, establishment of new boundary hedgerows to enhance the landscape structure and integration of sound principles underpinning a site-wide Green Infrastructure approach that contributes towards addressing the criteria of local and national policy requirements.</p>

<p>5(c) To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets</p>		<p>The Heritage Report confirms that the site will have minimal harm to the setting and significance of the registered battlefield to the north of Enborne Street.</p> <p>Further archaeological investigation to assess the potential of the site can be achieved through an appropriately worded planning condition.</p> <p>There is no reason to believe that archaeological or heritage issues will constrain the deliverability and/or capacity of the site for residential development.</p>
<p>6(a) To reduce air pollution</p>		<p>Survey work and mitigation measures would be required.</p>
<p>6(b) To manage noise levels</p>		<p>Survey work and mitigation measures would be required.</p>
<p>6(c) To maintain and improve soil quality</p>		<p>Survey work and mitigation measures would be required.</p>
<p>6(d) To maintain and improve water quality</p>		<p>Survey work and mitigation measures would be required.</p>
<p>7(a) To maximise the use of previously developed land and buildings where appropriate</p>		<p>The site is greenfield land therefore is not re-using previously developed land or buildings. However, the LPR itself recognises that housing need cannot be met on brownfield land alone and therefore the scoring would be neutral.</p>
<p>7(b) To apply sustainable densities of land use appropriate to location and setting.</p>		<p>The SA that the site is unlikely to have an impact on land use density.</p>
<p>8(a) To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage</p>		<p>The proposed development can accommodate energy efficiency and renewable energy, above and beyond that of BREEAM and Building Regulation requirements.</p>
<p>8(b) To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials</p>		<p>The site is unlikely to have an impact waste generation.</p>
<p>8(c) To reduce water consumption and promote reuse</p>		<p>An enquiry would be required to assess the capacity water network capacity in this area. However, the proposal can meet modern water standards and reduce consumption.</p>

8(d) To reduce the consumption of minerals and promote reuse of secondary materials		Survey work would need to be undertaken relating to minerals.
10(a) To encourage a range of employment opportunities that meet the needs of the District		The site is unlikely to impact on employment opportunities, albeit it will result in multiple jobs being created in the construction phase.
10(b) To support key sectors and utilise employment land effectively and efficiently		The site is unlikely to impact on use of employment land.
10(c) To support the viability and vitality of town and village centres		The site is unlikely to impact on the viability and vitality of the town centre.

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Project Title
Land on Bell Hill
 Enborne Street
 Newbury
 RG14 6RP

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LOCATION PLAN			
Drawing No: 3014	Revision: 001	Date: 1 : 2500 @ A3	Scale: CE
Client: ISA	Designer: ISA	Date: Feb' 2023	

ENBORNE STREET, NEWBURY

LANDSCAPE AND VISUAL APPRAISAL

Hathor Property

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Landscape and Visual Appraisal	
Project:	Enborne Street, Newbury
Status:	Final
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Author:	JPF
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1.0 Executive Summary

- i. LVIA Ltd were instructed to undertake a landscape and visual appraisal for a residential scale scheme located at Enborne Street by Hathor Property in January 2023. The site and its surrounding landscape were assessed and a total of ten viewpoints were selected to represent a variety of receptors in the surrounding area.
- ii. The aim of this report is to provide an assessment of the potential landscape and visual effects of a proposed development upon the receiving landscape, in line with current legislation and guidance. It comprises two main assessments, the first for landscape and the second for visual effects.
- iii. The assessment has been conducted in line with published best practice guidelines and includes a desk study; (review of local plan policies, published landscape character assessment and production of a computer generated Zone of Theoretical Visibility (ZTV)) and onsite observations.
- iv. The site is currently formed by a field in agricultural use that is enclosed by woodland and hedgerows with trees. A residential gateway from Enborne Street allows access to the existing agricultural barn complex, which includes a Class Q permitted conversion to a single dwelling that sits to the west of the site. Within the site, the land is mainly laid to grassland in pastoral use. Existing residential development sits in the landscape to the north east along Enborne Street, east along the A343 and south along Washwater and within Spring Gardens. The site is relatively flat and slopes gently to the south from Enborne Street. The site falls within no areas of national designation.
- v. Due to the existing local area, the proposed scheme would not be out of character with its surroundings when considered as part of the wider landscape with development of a similar nature in the local landscape.
- vi. Mitigation measures have been suggested to aid the schemes visual blending with the existing environs.
- vii. Ten viewpoints were considered and of these one were considered to be subject to material visual impacts, viewpoint 1 that sits close the proposed site access. Other views are limited mainly due to the enclosure formed by vegetation in the surrounding landscape.
- viii. With the implementation of a successful mitigation strategy, the overall impact on the landscape is considered to be a minor character impact and a moderate visual impact on the visual baseline. It should be considered that this type of development is not out of character within the receiving landscape.

2.0 Introduction

- 2.1.1 LVIA Ltd were commissioned by Hathor Property in January 2023, to carry out a landscape and visual appraisal of the proposed development site located at Enborne Street, Newbury.
- 2.1.2 The brief was to assess the likely landscape and visual impacts of the development and identify the degree of change over the existing use and site conditions.
- 2.1.3 The field survey was carried out during February 2023, and all viewpoints were chosen from publicly accessible vantage points.
- 2.1.4 Particular attention was paid to the potential views of receptors of high sensitivity, e.g. users of Public Rights of Way (PRoW).
- 2.1.5 Landscape and visual impact assessments can be defined as a mechanism by which the landscape can be assessed against its capacity to accommodate change. The aim of this report is to provide an assessment of the potential landscape and visual effects of the proposed development upon the receiving landscape, in line with current legislation and guidance.

The Site

- 2.1.6 The site is accessed from Enborne Street and the proposals are for residential dwellings and associated landscaping with access route from Enborne Street.
- 2.1.7 The site is currently formed by a field in agricultural use that is enclosed by woodland and hedgerows with trees. A residential gateway from Enborne Street allows access to the existing agricultural barn complex, which includes a Class Q permitted conversion to a single dwelling that sits to the west of the site. Within the site, the land is mainly laid to grassland in pastoral use. Existing residential development sits in the landscape to the north east along Enborne Street, east along the A343 and south along Washwater and within Spring Gardens. The site is relatively flat and slopes gently to the south from Enborne Street. The site falls within no areas of national designation.
- 2.1.8 A registered battlefield sits to the north of the site along Enborne Road, but effects on this heritage feature are detailed within the accompanying heritage report.

3.0 Methodology

- 3.1.1 In conjunction with the landscape survey and assessment of the study area, a detailed visual survey has been undertaken in order to assess any potential visual impact of the development. In order to evaluate what the visual impact of the development will be and what can be done to ameliorate the impact, it is necessary to describe the existing situation to describe a basis against which any change can be assessed.
- 3.1.2 As a matter of best practice the assessment has been undertaken in accordance with the advisory guidelines set out in the document - “Guidelines for Landscape & Visual Impact Assessment – Third Edition”, published by The Landscape Institute and Institute of Environmental Assessment (2013).
- 3.1.3 The landscape assessment includes a baseline study that describes, and evaluates the existing landscape and visual resources, focusing on their sensitivity and ability to accommodate change.
- 3.1.4 The prime objective is to minimise the potential impact of the development by minimising the potential for visual impact wherever possible.
- 3.1.5 Information regarding the site and surroundings was gathered from Ordnance Survey maps, aerial photographs and on-site observations.
- 3.1.6 In order to assist in the assessment of the potential visual effects of any development, a computer-generated Zone of Theoretical Visibility (ZTV) has been modelled. The computer ZTV is used as a working tool to inform the assessment team of the extent of the zone within which the proposed development may have an influence or effect on landscape character and visual amenity and the areas within which the study area together with site survey work should be concentrated. It should be noted that this is a topographical information based exercise with no account being taken of the potential effects of vegetation or buildings on views.
- 3.1.7 Landscape has two separate but closely related aspects; firstly is the impact on the character of the landscape which includes responses that are felt toward the combined effect of the development. The significance of this will depend partly on the number of people affected and also on the judgements about how much the changes will matter in relation to the human senses of those concerned. Secondly, visual impact, in contrast to landscape character, is perhaps less prone to being subjective. Visual impact may occur by means of intrusion and/or obstruction, where visual intrusion is impact on the view without blocking it and visual obstruction is impact on a view that would be hidden by the development.

Table 1: Landscape Quality (or Condition)

Landscape Quality (or Condition)	Typical Indicators
Very High	All landscape elements remain intact and in good repair. Buildings are in local vernacular and materials. No detracting elements are evident
High	Most landscape elements remain intact and in good repair. Most buildings are in local vernacular and materials. Few detracting elements are evident
Medium	Some landscape elements remain intact and in good repair. Some buildings are in local vernacular and materials and some detracting elements are evident
Low	Few landscape elements remain intact and in good repair. Few buildings are in local vernacular and materials. Many detracting or incongruous elements are evident
Very Low	No landscape elements remain intact and in good repair. Buildings are not in local vernacular and materials. Detracting or incongruous elements are much in evidence

Table 2: Landscape Value

Landscape Value	Typical Indicators
Very High	Areas comprising a clear composition of valued landscape components in robust form and health, free of disruptive visual detractors and with a strong sense of place. Areas containing a strong, balanced structure with distinct features worthy of conservation. Such areas would generally be internationally or nationally recognised designations, such as Areas of Outstanding Natural Beauty (AONB).
High	Areas primarily containing valued landscape components combined in an aesthetically pleasing composition and lacking prominent disruptive visual detractors. Areas containing a strong structure with noteworthy features or elements, exhibiting a sense of place. Such areas would generally be national statutorily designated areas. Such areas may also relate to the setting of internationally or nationally statutory designated areas, such as AONB.
Medium	Areas primarily of valued landscape components combined in an aesthetically pleasing composition with low levels of disruptive visual detractors, exhibiting a recognisable landscape structure. Such areas would generally be non-statutory locally designated areas such as Areas of Great Landscape Value.
Low	Areas containing some features of landscape value but lacking a coherent and aesthetically pleasing composition with frequent detracting visual elements, exhibiting a distinguishable structure often concealed by mixed land uses or development. Such areas would be commonplace at the local level and would generally be undesignated, offering scope for improvement.
Very Low	Areas lacking valued landscape components or comprising degraded, disturbed or derelict features, lacking any aesthetically pleasing composition with a dominance of visually detracting elements, exhibiting mixed land uses which conceal the baseline structure. Such areas would generally be restricted to the local level and identified as requiring recovery.

Table 3: Character Sensitivity

Character Sensitivity	Typical Indicators
Very High	<p>Landscape elements: Important elements of the landscape susceptible to change and of high quality and condition.</p> <p>Scale and Enclosure: Small-scale landform/land cover/ development, human scale indicators, fine grained, enclosed with narrow views, sheltered.</p> <p>Manmade influence: Absence of manmade elements, traditional or historic settlements, natural features and 'natural' forms of amenity parkland, perceived as natural 'wild land' lacking in man-made features, land use elements and detractors</p> <p>Remoteness and Tranquillity: Sense of peace, isolation or wildness, remote and empty, no evident movement.</p>
High	<p>Where, on the whole, indicators do not meet the Very High criteria but exceed those for Medium</p>
Medium	<p>Landscape elements: Important elements of the landscape of moderate susceptibility to change and of medium quality and condition.</p> <p>Scale and Enclosure: Medium-scale landform/land cover/ development, textured, semi-enclosed with middle distance views.</p> <p>Manmade influence: Some presence of man-made elements, which may be partially out of scale with the landscape and be of only partially consistent with vernacular styles.</p> <p>Remoteness and Tranquillity: some noise, evident, but not dominant human activity and development, noticeable movement.</p>
Low	<p>Where, on the whole, indicators do not meet the Medium criteria but exceed those for Very Low.</p>
Very Low	<p>Landscape elements: Important elements of the landscape insusceptible to change and of low quality and condition.</p> <p>Scale and Enclosure: Large-scale landform/land cover/ development, Featureless, coarse grained, open with broad views.</p> <p>Manmade influence: Frequent presence of utility, infrastructure or industrial elements, contemporary structures e.g. masts, pylons, cranes, silos, industrial sheds with vertical emphasis, functional man-made land-use patterns and engineered aspects.</p> <p>Remoteness and Tranquillity: Busy and noisy, human activity and development, prominent movement.</p>

Table 4: Landscape Visual Sensitivity

Landscape Visual Sensitivity	Typical Indicators
Very High	Visual interruption: Flat or gently undulating topography, few if any vegetative or built features. Nature of views: Densely populated, dispersed pattern of small settlements, outward looking settlement, landscape focused recreation routes and/or visitor facilities, distinctive settings, gateways or public viewpoints.
High	Where, on the whole, indicators do not meet the Very High criteria but exceed those for Medium.
Medium	Visual interruption: Undulating or gently rolling topography, some vegetative and built features. Nature of views: Moderate density of population, settlements of moderate size with some views outwards, routes with some degree of focus on the landscape.
Low	Where, on the whole, indicators do not meet the Medium criteria but exceed those for Very Low.
Very Low	Visual interruption: Rolling topography, frequent vegetative or built features. Nature of views: Unpopulated or sparsely populated, concentrated pattern of large settlements, introspective settlement, inaccessible, indistinctive or industrial settings.

Table 5: Definition of Magnitude of Landscape Impacts

Magnitude	Description
Large	Total loss of or major alteration to key valued elements, features, and characteristics of the baseline or introduction of elements considered being prominent and totally uncharacteristic when set within the attributes of the receiving landscape. Would be at a considerable variance with the landform, scale and pattern of the landscape. Would cause a high quality landscape to be permanently changed and its quality diminished.
Medium	Partial loss of or alteration to one or more key elements, features, characteristics of the baseline or introduction of elements that may be prominent but may not be considered to be substantially uncharacteristic when set within the attributes of the receiving landscape. Would be out of scale with the landscape, and at odds with the local pattern and landform. Will leave an adverse impact on a landscape of recognised quality.
Small	Minor loss or alteration to one or more key elements, features, characteristics of the baseline or introduction of elements that may be prominent but may not be uncharacteristic when set within the attributes of the receiving landscape. May not quite fit into the landform and scale of the landscape. Affect an area of recognised landscape character
Negligible	Very minor loss or alteration to one or more key elements, features, and characteristics of the baseline or introduction of elements that are not uncharacteristic when set within the attributes of the receiving landscape. Maintain existing landscape quality, and maybe slightly at odds to the scale, landform and pattern of the landscape.

3.1.8 'Material' landscape effects would be those effects assessed to be major or major/moderate and are indicated by shading in the following table.

Table 6: Significance of Landscape Effects

Magnitude	Sensitivity				
	Very High	High	Medium	Low	Very Low
Large	Major	Major	Major/ moderate	Moderate	Moderate/ minor
Medium	Major	Major/ moderate	Moderate	Moderate/ minor	Minor/ negligible
Small	Moderate	Moderate/ minor	Minor	Negligible	Negligible
Negligible	Minor/ moderate	Minor	Minor/ negligible	Negligible	Negligible

3.1.9 The prediction and extent of effect cannot always be absolute. It is for each assessment to determine the assessment criteria and the significance thresholds, using informed and well-reasoned professional judgement supported by thorough justification for their selection, and explanation as to how the conclusions about significance for each effect assessed have been derived, as noted in GLVIA 3rd edition para 2.23-2.26 and 3.32-36.

3.1.10 In order to determine the magnitude of impact for any critical viewpoints of the subject site, whether in the immediate locality or further afield, the assessment of visual impact takes into account the;

- Sensitivity of the views and viewers (visual receptor) affected;
- Extent of the proposed development that will be visible;
- Degree of visual intrusion or obstruction that will occur;
- Distance of the view;
- Change in character or quality of the view compared to the existing.

3.1.11 The locations from which the proposed development will be visible are known as 'visual receptors'. For the purposes of a visual assessment the visual receptors would be graded according to their sensitivity to change.

Table 7: Visual Receptor Sensitivity

Receptor Sensitivity	Description
High	Occupiers of residential properties. Users of outdoor recreational facilities, including public rights of way, whose attention or interest may be focused on the landscape Communities where the development results in changes in the landscape setting or valued views enjoyed by the community.
Medium	People travelling through or past the affected landscape in cars, on trains or other transport routes where higher speeds are involved and views sporadic and short-lived. People engaged in outdoor recreation where enjoyment of the landscape is incidental rather than the main interest.
Low	People at their place of work, Industrial facilities.

Table 8: Definition of Magnitude of Visual Impact

Magnitude	Description
Very Large	<p>The development would result in a dramatic change in the existing view and/or would cause a dramatic change in the quality and/or character of the view. The development would appear large scale and/or form the dominant elements within the overall view and/or may be in full view the observer or receptor.</p> <p>Commanding, controlling the view.</p>
Large	<p>The development would result in a prominent change in the existing view and/or would cause a prominent change in the quality and/or character of the view. The development would form prominent elements within the overall view and/or may be easily noticed by the observer or receptor.</p> <p>Standing out, striking, sharp, unmistakable, easily seen.</p>
Medium	<p>The development would result in a noticeable change in the existing view and/or would cause a noticeable change in the quality and/or character of the view. The development would form a conspicuous element within the overall view and/or may be readily noticed by the observer or receptor.</p> <p>Noticeable, distinct, catching the eye or attention, clearly visible, well defined.</p>
Small	<p>The development would result in a perceptible change in the existing view, and/or without affecting the overall quality and/or character of the view. The development would form an apparent small element in the wider landscape that may be missed by the observer or receptor.</p> <p>Visible, evident, obvious.</p>
Very Small	<p>The development would result in a barely perceptible change in the existing view, and/or without affecting the overall quality and/or would form an inconspicuous minor element in the wider landscape that may be missed by the observer or receptor.</p> <p>Lacking sharpness of definition, not obvious, indistinct, not clear, obscure, blurred, indefinite.</p>
Negligible	<p>Only a small part of the development would be discernible and/or it is at such a distance that no change to the existing view can be appreciated.</p> <p>Weak, not legible, near limit of acuity of human eye.</p>

Table 9: Significance of Visual Effects

Magnitude	Sensitivity		
	High	Medium	Low
Very large	Major	Major	Major/moderate
Large	Major	Major/moderate	Moderate
Medium	Major/moderate	Moderate	Moderate/minor
Small	Moderate	Moderate/minor	Minor
Very Small	Minor	Minor	Negligible
Negligible	Negligible	Negligible	Negligible

(Shaded areas show material effects)

4.0 Landscape Baseline

Landscape Baseline

4.1.1 The overall landscape character of the site and its surroundings can be determined as the result of the relationship between landform, land cover, landscape elements and climate.

4.1.2 An Approach to Landscape Character Assessment which was published by Natural England in 2014 offers five key principles of Landscape Assessment at paragraph 1.4. These are given as:

- Landscape is everywhere and all landscape and seascape has character;
- Landscape occurs at all scales and the process of Landscape Character Assessment can be undertaken at any scale;
- The process of Landscape Character Assessment should involve an understanding of how the landscape is perceived and experienced by people;
- A Landscape Character Assessment can provide a landscape evidence base to inform a range of decisions and applications;
- A Landscape Character Assessment can provide an integrating spatial framework – a multitude of variables come together to give us our distinctive landscapes.

4.1.3 The site falls within national character area (NCA) 129 – Thames Basin Heaths; as defined by Natural England in their nationwide assessment.

4.1.4 The key characteristics of the NCA are defined as (points of relevance to the site and its context are highlighted for clarity):

- Plateaux of Tertiary sands and gravels in the London Basin, with intervening river valleys floored by London Clay. In the far west, Chalk forms the Hampshire Downs escarpment and the river beds of the Kennet and Pang.
- **High woodland cover**, offering an array of colour in the autumn. Conifers and large plantations on former heathland are dominant features in the east, while the west is scattered with small, semi-natural woodlands on ancient sites.
- Acid, leached soils mean that farming on the plateaux is limited to rough pasture, and that alternative land uses (such as forestry, golf courses and horse paddocks) have emerged. Heather, gorse, oak and birch all thrive here. Arable land and improved pasture are found in the valleys, on alluvium.
- Beyond the large areas of heathland and woodland, there is a patchwork of small to medium-sized fields with woods. The legacy of historic hunting forests includes veteran trees, ancient woods, ancient hedgerows and parklands. Historic meadows remain as fragments along watercourses.
- Prehistoric earthworks such as barrows and hill forts mark promontories on the plateaux. Archaeology is well preserved on historic heathland. Mosaics of open heathland and grassland with scrub, secondary woodland and plantation. Valley bogs, ponds and streams enhance diversity. Large, continuous mosaics are found in the east: they include Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), and Chobham Common National Nature Reserve (NNR).

- Historic commons offer tranquillity and unenclosed views, while other rights of access are enjoyed across farmland, canals and downland. Ministry of Defence ownership restricts (but does not entirely prevent) public enjoyment.
- ‘Churring’ nightjars, dragonflies and purple heather are all readily identified with heathland. The Thames Basin Heaths SPA protects internationally important populations of woodlark, nightjar and Dartford warbler.
- Valley floors are wet with ditches, numerous watercourses, ponds, waterfilled gravel pits, reedbeds and carr. Historic features include mills, relict water meadows, and canals such as the River Wey Navigations.
- 20th-century conurbations, including Camberley, sprawl along the Blackwater Valley, with associated roads (including the M3) dissecting heathland and woodland into blocks. Elsewhere, there are winding lanes and historic dispersed villages and farmsteads of traditional, locally-made brick and tile.

4.1.5 The NCA covers a relatively wide and diverse area. The site and its context exhibit very few of the key characteristics of the NCA, predominantly only where they relate to the wooded nature of the surrounding landscape. This lack of close representation is to be expected due to the relatively large scale of the character area.

Sub-Regional Character

4.1.6 The West Berkshire Landscape Character Assessment (2019) has been produced to provide detailed information about character at the sub-regional level.

4.1.7 The site falls within landscape character type (LCT) WH: Woodland and Heathland Mosaic.

4.1.8 The LCT is further subdivided into landscape character areas (LCA). The site falls within LCA WH1: Inkpen Woodland and Heathland Mosaic. The LCA is summarised as:

A topographically complex area with ridges and shallow valleys, incised by numerous small streams flowing from the spring line where the chalk meets the clay. Woodland dominates the land cover, interspersed with arable and pasture fields and small areas of heathland. The extent of connected woodland creates an enclosed and very rural character despite the extent of settlement. The open areas have views across to Walbury Hill which forms a prominent backdrop. It is crossed by a network of rural lanes which provide a framework for the linear settlement pattern, particularly around Inkpen.

The western edge is delineated by the District boundary. The dramatically rising slopes of the chalk scarp at Walbury Hill mark the south extent of the area and Newbury to the east. The northern edge towards Kintbury and Hamstead Marshall is created by the transition in geology to the valley of the River Kennet, and the less-wooded farmed chalk mosaic on the valley slopes. The area to the west of Park Lane forms part of the North Wessex Downs AONB; the essential character of the area extends beyond the AONB boundary towards Newbury, with the presence of parklands a feature as at the surviving coherent parkland at Hamstead Marshall

4.1.9 The site is not closely represented in the summary, but the well wooded nature of the surrounding landscape and the enclosure this forms is identified. This enclosure generally prevents views of the site from the wider landscape.

4.1.10 The key characteristics of the LCA are defined as (points of relevance to the site and its context are highlighted for clarity):

1) Geologically and topographically varied with undulating slopes rising from the rivers Enborne and Kennet. The area is underlain by a mosaic of clays, gravels and sands, creating a complex micro topography of undulating hills, consecutive ridges and small shallow valleys.

2) Presence of surface water and small streams running parallel to ridges. The spring line, where the chalk meets the clay, cuts across the area, resulting in an extensive network of small streams, springs and wells. The watercourses are frequently dammed, so that standing water within small on-stream ponds is a visible element.

3) Patchwork of land use, dominated by woodland including areas of common and parkland. **The area has a strongly wooded character**, composed of numerous interlinked woodland blocks, including ancient woodland, **that enclose irregular assarted damp pastures and unimproved grasslands**. There are also heathland remnants such as at Inkpen Common, which is a remnant of the former Inkpen Great Common. Evidence of medieval deer parks remain as areas of parkland, for example around the Grade II Registered Hamstead Marshall Park.

4) Varied field pattern with strong hedgerows. A mosaic of small irregularly shaped fields of arable/pasture, often with wooded margins or contained by thick hedges, characteristic of piecemeal and informal medieval assarting and enclosure. In some areas the hedgerows dividing the pastures have been lost resulting in a larger and more open landscape.

5) Ecologically important network of ancient woodland and heathland habitats. There is considerable diversity within the wooded framework, and light sands and gravels create a heathy character in places. This is illustrated by commons of birch and bracken, heathy rides through the woodlands, and areas of poorer acid pasture. There are also important small areas of remnant heath as for example at Inkpen Common SSSI. The valley woodlands include wet valley alderwood and the woodland edges frequently have less dense stands of birch and hazel with a bracken understorey. Elsewhere there are coppices within oak woodland.

6) Tight network of rural lanes, often bounded by banks form the framework for loose, linear settlements. This character area is crossed by a tight network of rural lanes often bounded by banks. These form the framework for settlements, which are predominantly linear villages, such as Lower Green and Inkpen. More recently growth around Inkpen has linked up previously distinct historic settlement nuclei to create a larger village. Small hamlets and farms and studs are dispersed throughout the area, plus some modern estate and bungalow development. However, the combination of wooded land cover and gently undulating landform means that buildings are generally well integrated into their landscape context. The A34 crosses across the east of the area and Newbury forms the eastern boundary.

7) Intimate small scale rural character including dark skies. The landscape has a coherent character, with a consistent framework provided by the **strong structure of woodlands, hedgerows and trees. This creates a small scale, enclosed and intimate rural character**. The tranquillity is enhanced by a lack of intrusion of modern life into the majority of the area (away from the A34), and there are very dark skies.

8) Spectacular views to the Walbury escarpment Much of the area has views to the Walbury escarpment and Walbury Hill which forms a prominent backdrop.

4.1.11 The site and its context exhibit very few of the key characteristics, principally only the enclosure formed by the surrounding extensive woodland and the pastoral grassland use of the site.

Landscape Sensitivity

4.1.12 The site is currently formed by a field in agricultural use that is enclosed by woodland and hedgerows with trees. A residential gateway from Enborne Street allows access to the dwelling that sits to the west of the site – this can be seen in viewpoint 1 within Section 5.0 Visual Baseline. The Grange that sits nearby to the north east of the site is of a similar urban form to the proposals, with dwellings set within surrounding woodland that forms enclosure.

4.1.13 Within the site, the land is mainly laid to grassland in pastoral use. Existing residential development sits in the landscape to the north east along Enborne Street, east along the A343 and south along Washwater and within Spring Gardens. The site is relatively flat and slopes gently to the south from Enborne Street. The site falls within no areas of national designation.

4.1.14 To the south of the site, a planning application for a solar farm is currently live (reference 22/00101) which would form an additional built element in the local area if approved.

4.1.15 Road noise can be heard within the site from nearby routes and an existing adjacent residential dwelling that sits to the north east of the site has some limited visual interconnectivity with the site.

4.1.16 The area contains some features of landscape value and exhibits a coherent composition. The landscape elements within the area are commonplace at the local level. There is some presence of manmade elements and road noise and human activity in the local landscape is noticeable. Frequent vegetative and built features create enclosure. The overall sensitivity of the landscape is considered to be medium.

4.1.17 The proposal would be consistent with the current landscape character of the site and its surrounding context. With a successful mitigation strategy as outlined in Section 7.0 Mitigation, the proposal would further integrate with its setting.

5.0 Visual Baseline

Limits to study Area

- 5.1.1 The limits to the study area have been determined by the visual envelope of the development site. This area has been adopted as the main study area, as it surrounds the site and may be considered likely to be most impacted by physical change.
- 5.1.2 In order to assist in the assessment of the potential visual effects of any development, a computer-generated Zone of Theoretical Visibility (ZTV) has been modelled. The computer ZTV is used as a working tool to inform the assessment team of the extent of the zone within which the proposed development may have an influence or effect on landscape character and visual amenity and the areas within which the study area together with site survey work should be concentrated. It should be noted that this is a topographical information based exercise with no account being taken of the potential effects of vegetation or buildings acting as a visual barrier. The ZTV is shown in Figure 3: Zone of Theoretical Visibility.
- 5.1.3 The initial study area was set to a radius of approximately 2.5km from the centre of the site (N51°22'18, W01°21'19) on the basis that at this distance, this form of development, when seen by the human eye, would be hardly discernible or not legible.
- 5.1.4 Viewpoints have been detailed in table 10: Viewpoint Details which outlines location and rationale for selection.

Table 10: Viewpoint Details

No	Location	Distance (km) and direction of view	Northing	Westing	Sensitivity of Visual Receptor
1	Enborne Street	0.01, SE	51°22'22	01°21'21	Medium – Road users
2	ENBO/9/3	0.01, SE	51°22'21	01°21'22	High – Users of PRow
3	ENBO/9/3	0.07, E	51°22'19	01°21'26	High – Users of PRow
4	ENBO/9/3	0.15, E	51°22'18	01°21'32	High – Users of PRow
5	Andover Drove	0.22, E	51°22'15	01°21'33	Medium – Road users
6	Andover Drove	0.26, NE	51°22'12	01°21'35	Medium – Road users
7	Washwater	0.32, NW	51°22'05	01°21'10	Medium – Road users
8	Enborne Street	0.19, SW	51°22'27	01°21'13	Medium – Road users
9	Enborne Street	0.06, SW	51°22'24	01°21'16	Medium – Road users
10	Enborne Street	0.01, SW	51°22'23	01°21'18	Medium – Road users

Views to the site

- 5.1.5 It is clear that, despite the study area being potentially visible from a wide variety of locations, at varying distances and from a limited number of private and public areas, that the visual envelope is actually quite limited.
- 5.1.6 The visibility of the site is dependent on a range of factors, including location of viewpoint, distance of view, the angle of the sun, time of year and climatic conditions. Of equal importance will be whether the site is seen completely or in part of the skyline, where land provides a backcloth and where there is a complex foreground or an expansive landscape surrounding the view. The aspect of dwellings and whether it is a main view or one from a secondary window less frequently used is also a consideration.
- 5.1.7 A photographic study of the site has been undertaken. The viewpoints are at varying distances from the site and have been selected to represent potential views seen by the most sensitive receptors from around the site.
- 5.1.8 The site visit has been undertaken during months when vegetation does not have its foliage and is acting as less dense visual barriers. In months when vegetation retains its foliage, it will act as denser visual barriers.
- 5.1.9 The sensitivity of most of the local receptors is assessed as either high or medium as shown in table 7: Visual Receptor Sensitivity.
- 5.1.10 For the field assessment, a Canon EOS 500D camera with an 18-55mm lens was used, set at 35mm focal length. This is in line with best practice as shown in the Visual Representation of Development Proposals technical guidance note issued by the Landscape Institute (Technical Guidance Note 06/19).
- 5.1.11 The site was visited on the 9th of February 2023; the weather was overcast and bright.

Viewpoint 1: View from Enborne Street



Vp1	Panoramic View	(Distance 0.01km looking south east)
Baseline Description	This is a view from Enborne Street looking south east towards the proposed site access. The sites northern boundary can be seen following the road, formed by a combination of an existing residential access with electrically controlled gateway, fencing and mature evergreen ornamental and native species vegetation. Some partial views into the site are available of the grassland that is enclosed by woodland. A longer range vista to well wooded hills that sit to the south can be partly. Telegraph poles follow the road forming manmade elements with a vertical emphasis on the view.	
Predicted change	From this viewpoint, the proposals would be seen within the site, with views partly filtered by vegetation that sits along its northern boundary. The views across the site would be reduced.	
Type of effect	The introduction of the proposed building would be comparable to the type of residential dwellings that sit in the local landscape.	
Magnitude of Change	The development would result in a prominent change in the view that would be easily seen by an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Large
Significance of Effect	Major/moderate – A material change	

Viewpoint 2: View from ENBO/9/3 – 0.01km looking south east



Viewpoint 3: View from ENBO/9/3 – 0.07km looking east



Viewpoint 4: View from ENBO/9/3 – 0.15km looking east



Vps 2, 3 and 4	Panoramic Views	
Baseline Description	These viewpoints are from footpath ENBO/9/3, illustrating the views that can be observed along the route. The footpath runs through the woodland that sits to the west of the site that forms enclosure to longer range views of the landscape. Some heavily filtered views of the western edge of the site are available from viewpoint 2 that sits geographically closer than viewpoints 3 and 4. Some taller parts of the dwelling and built form that sits to the west of the site can be partly seen from viewpoint 3 with views prevented by understorey vegetation at lower levels.	
Predicted change	From these viewpoints, some partial views of built form situated closer to the western boundary of the site would be available through the mature vegetation that sits in the intervening woodland. The change will not stand out, but would be perceptible from viewpoint 2 and 3, with no views from viewpoint 4. the proposals would be seen within the site, with views party filtered by vegetation that sits along its northern boundary. The views across the site would be reduced.	
Type of effect	The introduction of the proposed building would be comparable to the type of residential dwellings that sit in the local landscape.	
Magnitude of Change	The development would result in a perceptible change in the view that would be evident to an observer.	
Assessment	Sensitivity	High – Users of PRoW
	Magnitude	Small
<i>Significance of Effect</i>		<i>Moderate – Not a material change</i>

Viewpoint 5: View from Andover Drove – 0.22km looking east



Viewpoint 6: View from Andover Drove – 0.26km looking north east



Vps 5 and 6	Panoramic Views	
Baseline Description	These viewpoints are from Andover Drove, illustrating the views that can be observed along the road. The woodland that sits to the west of the site forms enclosure to the views of the wider landscape. A field in agricultural use that sits to the south of the site is defined by a well managed hedgerow along the road and by woodland and hedgerows with trees along its northern boundary. The field rises to the east, then falls and forms a visual barrier to views further to the east.	
Predicted change	From these viewpoints, the proposals will not be visible due to the mature woodland and vegetation that sits in the intervening landscape acting as dense visual barriers.	
Type of effect	The introduction of the proposed building would be comparable to the type of residential dwellings that sit in the local landscape.	
Magnitude of Change	The development would result in no change in the view that would be discernible to an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Negligible
Significance of Effect	Negligible – Not a material change	

Viewpoint 7: View from Washwater



Vp7	Panoramic View <i>(Distance 0.32km looking north west)</i>	
Baseline Description	This is a view from Washwater looking north west towards the proposed site through a gap in the hedgerow that fools the road formed by a gateway. In the foreground can be seen a field in agricultural use that is defined by mature hedgerows with trees. Filtered views of the dwellings situated at Spring Gardens can be partly seen to the north west set within a well vegetated setting.	
Predicted change	From these viewpoints, the proposals will not be visible due to the existing residential dwellings and mature vegetation that sit in the intervening landscape acting as dense visual barriers.	
Type of effect	The introduction of the proposed building would be comparable to the type of residential dwellings that sit in the local landscape.	
Magnitude of Change	The development would result in no change in the view that would be discernible to an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Negligible
Significance of Effect		<i>Negligible – Not a material change</i>

Viewpoint 8: View from Enborne Street – 0.19km looking south west



Viewpoint 9: View from Enborne Street – 0.06km looking south west



Viewpoint 10: View from Enborne Street – 0.01km looking south west



Vps 8, 9 and 10	Panoramic Views	
Baseline Description	These viewpoints are from Enborne Street, illustrating the views that can be observed as an observer travels south along the road. Views from this area are likely to be transitional in nature as there are no footpaths so views will generally be from vehicles. The road is bound on both sides by tree lined hedgerows and woodland with only heavily filtered views of the landscape beyond available. Consequently, views are generally channelled along the road itself. Telegraph poles and lighting columns follow the road forming manmade elements with a vertical emphasis on views.	
Predicted change	From these viewpoints, limited views of the proposals will be visible from viewpoints 9 and 10 but these will be very limited in scope due to the vegetative filters that follow Enborne Street. Views from viewpoint 8 are not available due to visual barriers formed by the intervening vegetation.	
Type of effect	The introduction of the proposed building would be comparable to the type of residential dwellings that sit in the local landscape.	
Magnitude of Change	The development would result in a barely perceptible change in the view that would not be obvious to an observer.	
Assessment	Sensitivity	Medium – Road users
	Magnitude	Very small
<i>Significance of Effect</i>		<i>Minor – Not a material change</i>

6.0 Characteristics of Proposal

- 6.1.1 The proposed development is for residential dwellings and associated landscaping with access route from Enborne Street.
- 6.1.2 The construction of building elements, together with associated traffic, parking, lighting and security fencing can temporarily but substantially change the landscape character of an area and impact upon its existing visual and/or recreational amenity.
- 6.1.3 In order to minimise potential impacts, together with the optimum benefit for landscape character and visual amenity the proposals should provide environmental enhancement and make a positive contribution to the landscape, not only of the development itself, but to its wider setting. This should include visual barriers as close to the viewer as possible. Its principal objectives are to:
- Minimise views from residential areas
 - Assist visual integration of the development
 - Provide an internal site landscape structure and enhance internal road corridors
 - Reinforce the opportunity to maintain wildlife corridors at the site boundaries.
- 6.1.4 The initial construction phase will give rise to temporary, short term impacts. Any modifications or extensions that occur from time to time in the future will also give rise to this short term construction impact.
- 6.1.5 The site and its context has an overall weighted medium landscape sensitivity. This conclusion was reached in line with the definitions of landscape impact shown in tables 1 to 4 within this document.
- 6.1.6 The scale and nature of the proposal and its juxtaposition to other built form will have an overall weighted landscape impact that could be considered medium as they are not substantially uncharacteristic when set within the attributes of the existing landscape. This conclusion was reached in line with the definitions of landscape impact shown in table 5 within this document.
- 6.1.7 The overall weighted level of landscape effect can be considered moderate (i.e. not a material change).
- 6.1.8 The visual impact and the significance of the impacts of the development on the open countryside have been assessed as potentially major/moderate (i.e. a material change) without mitigation from viewpoint 1 at the proposed site access. Change is very limited in its geographic extent due to the surrounding vegetation, landform and built form.
- 6.1.9 Measures have been recommended to further reduce these impacts and these are located in section 7.0: Mitigation.

7.0 Mitigation

7.1.1 Mitigation measures would include:

- Retention and management of the native tree and hedgerow planting that sits around the site boundary and additional native species planting to sit alongside the woodland;
- Planting of street trees throughout the layout;
- Additional ornamental planting within residential frontages to encourage year round interest and pollinators;
- The heights of built form reflecting that of its surroundings;
- Built form set back from boundaries to allow growth of boundary vegetation, in particular to the sites southern boundary;
- Where external lighting is required it is to be designed in line with best practice to minimise the potential for light spill;
- The use of materials for the external envelope of the buildings which minimise potential visual intrusion and follow the local vernacular to aid visual blending.

7.1.2 With suitable mitigation measures, the development will have a moderate visual impact and a minor character impact (i.e. not a material change).

8.0 Conclusion

- 8.1.1 The scale and nature of the development and its juxtaposition to other existing residential development and the receiving suburban fringe will have a medium landscape character sensitivity and the magnitude of change is medium; therefore resulting in a level of landscape effect of moderate (i.e. not a material change).
- 8.1.2 The visual effects are minimal due in most part to mature vegetation between the viewer and site, the topography in the area and the similar setting of the proposed scheme.
- 8.1.3 For the proposed site and the surroundings during construction, an increase of delivery vehicles and people travelling to the works can be expected. These effects will be short lived however and will not require mitigation during the construction process.
- 8.1.4 The viewpoints assessed showed that although the site is at least partly visible from Enborne Road and PRoW ENBO/9/3 of the ten assessed, only one of the assessed views can be considered subject to a material change, viewpoint 1 that sits close the proposed site access.
- 8.1.5 The majority of receptors in the local area can be considered of a high or medium sensitivity (users of PRoW and road users). The visual impact of the development on the open countryside has been assessed, at worst case scenario, as major/moderate (i.e. a material change) from viewpoint 1 that sits close to the sites boundary and access.
- 8.1.6 Other viewpoints offer very limited views of the site due in most part to mature vegetation and the landform acting as visual barriers.
- 8.1.7 With suitable mitigation measures, the development will have a moderate visual impact and a minor character impact (i.e. not a material change).

9.0 Appendices

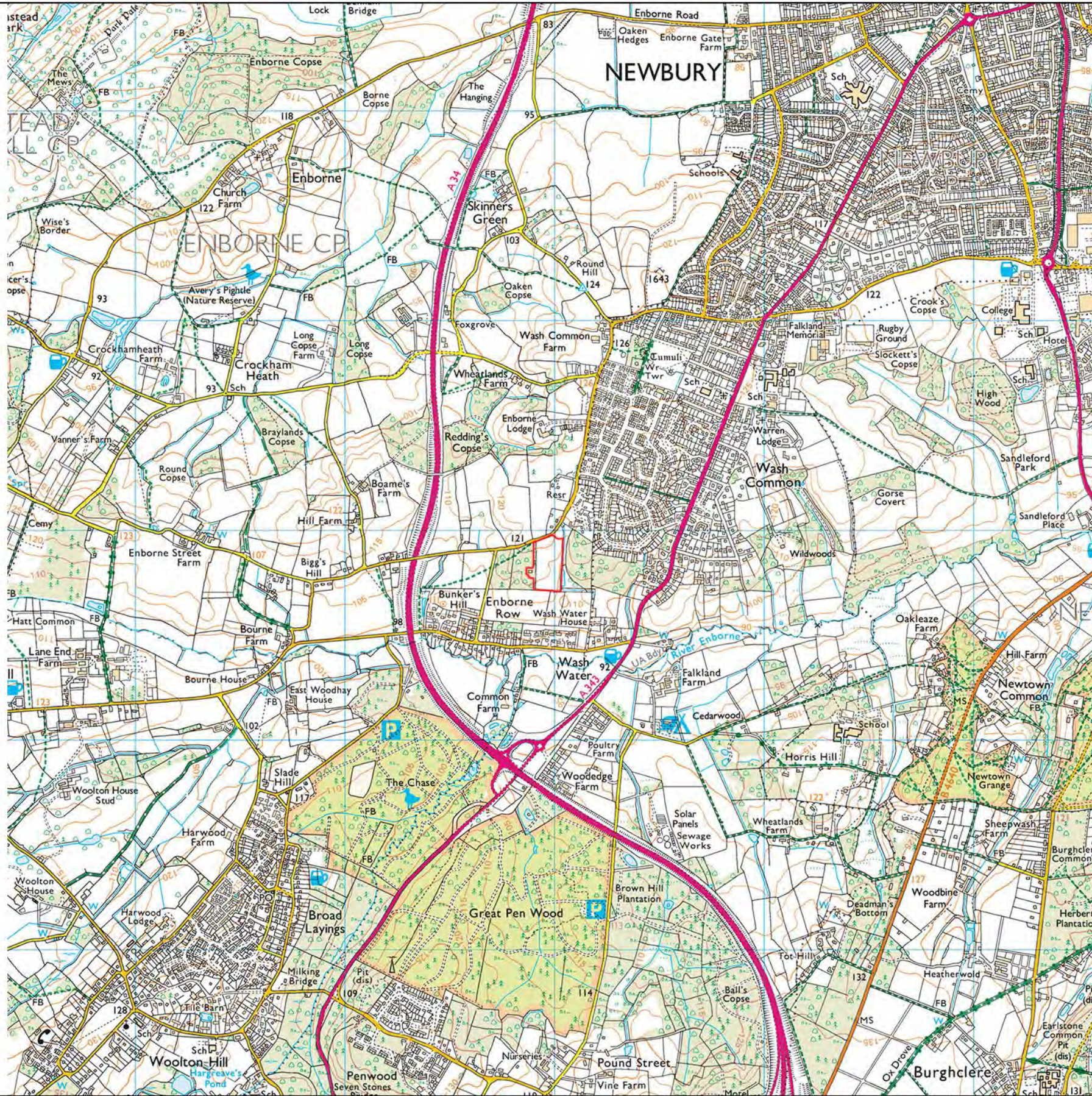
Figure 1: Ordnance Survey Map

Figure 2: Aerial Photograph

Figure 3: Zone of Theoretical Visibility

Figure 4: Viewpoint Location Plan

Figure 5: Designation Plan



LEGEND



Site boundary



For ordnance survey map legend, refer to:
<https://www.ordnancesurvey.co.uk/docs/legends/25k-raster-legend.pdf>

Client: Hathor Property		
Scheme: Enborne Street, Newbury		
Drawing: Ordnance Survey Plan	Figure No: 1	
LVIA Ltd Ref: HAT1357		
Scale: NTS@A3	Drawn: SC	Checked: JPF





LEGEND



Site boundary



Image supplied by Google Maps
<https://maps.google.co.uk/>
Accessed 15/02/23

Client: Hathor Property

Scheme: Enborne Street, Newbury

Drawing: Aerial Photograph

Figure No: 2

LVIA Ltd Ref: HAT1357

Scale: NTS@A3

Drawn: SC

Checked: JPF





LEGEND



Site boundary

Zone of theoretical visibility



Yellow wash - Potential view



Grey wash - No potential view

NB: Viewshed analysis run with 1.6m viewer height and buildings at a 8m height with mapinfo and represents surface topography, without taking into account potential visual barriers in the form of trees, hedgerows, woodland, buildings and other manmade elements.



Client: Hathor Property

Scheme: Enborne Street, Newbury

Drawing: Zone of Theoretical Visibility

Figure No: 3

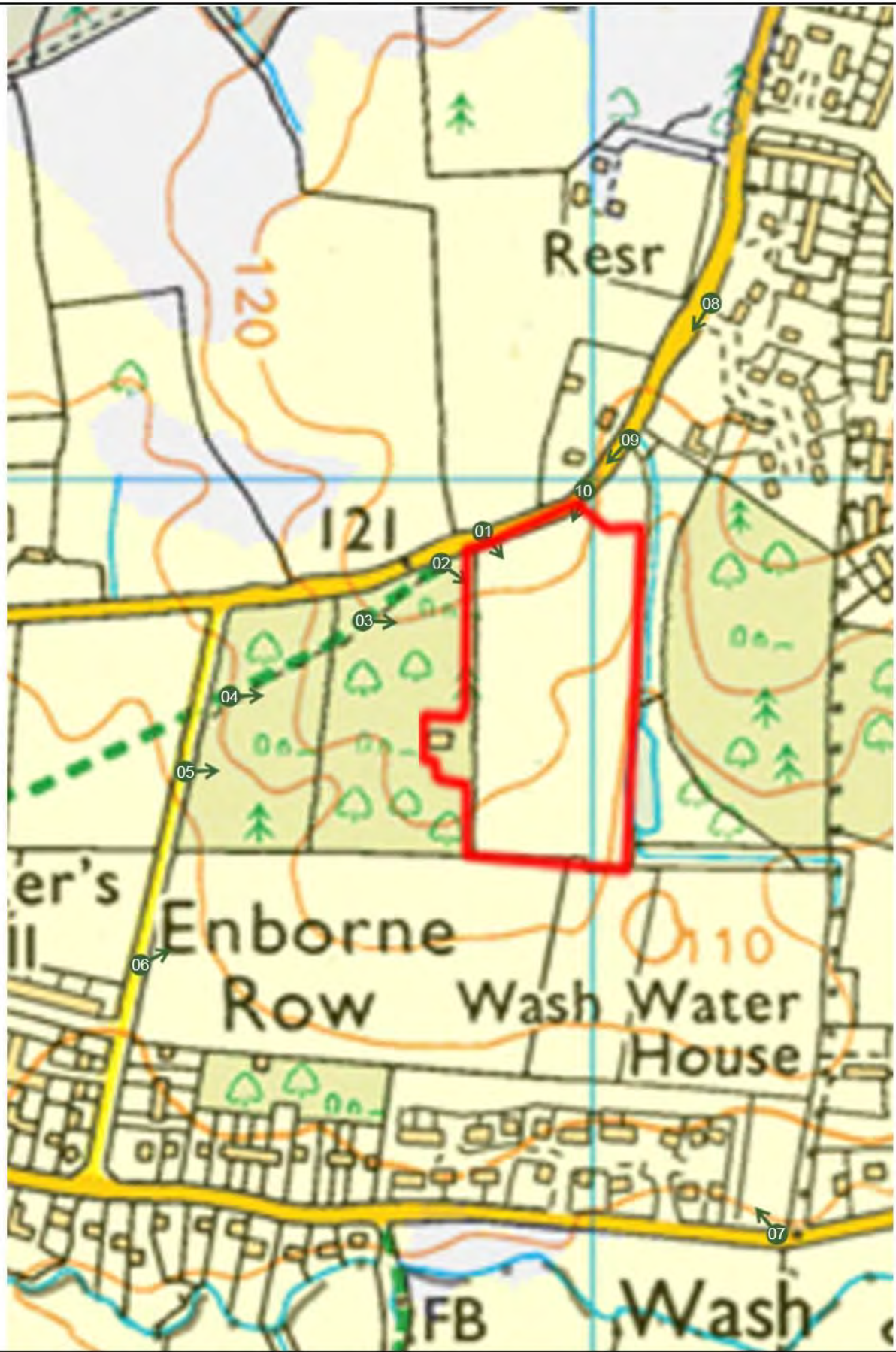
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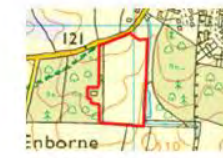
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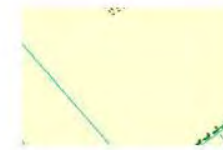


Site boundary



Viewpoint location

Zone of theoretical visibility



Yellow wash - Potential view



Grey wash - No potential view

NB: Viewshed analysis run with 1.6m viewer height and buildings at a 8m height with mapinfo and represents surface topography, without taking into account potential visual barriers in the form of trees, hedgerows, woodland, buildings and other manmade elements.

Extract provided for ease of reference, full extent of ZTV shown on Figure 3



Client: Hathor Property

Scheme: Enborne Street, Newbury

Drawing: Viewpoint Location Plan

Figure No: 4

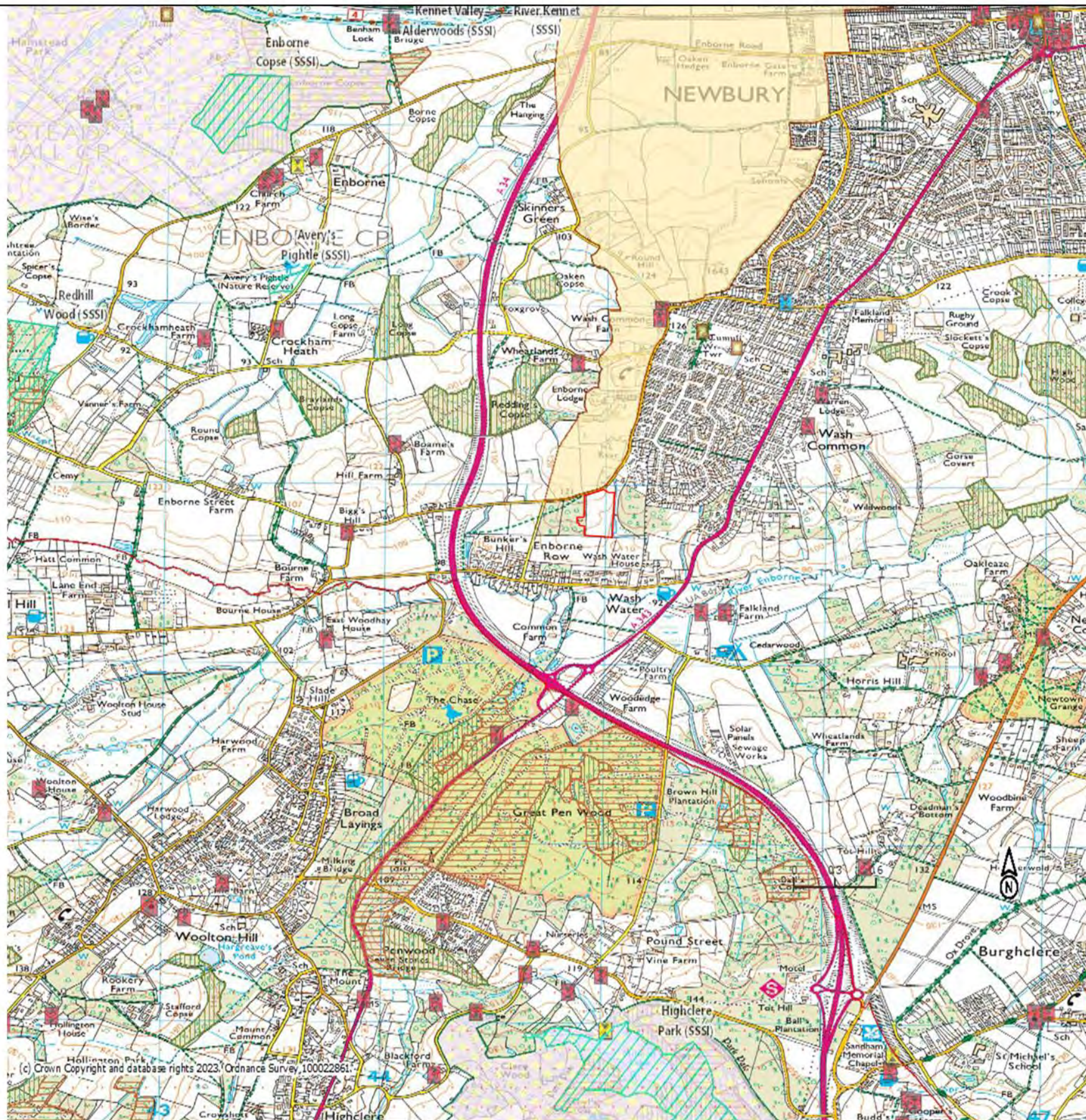
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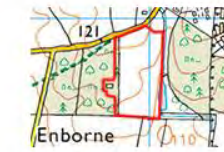
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LEGEND



Site Boundary

- Areas of Outstanding Natural Beauty (England)
- Sites of Special Scientific Interest (England)
- Scheduled Monuments (England) - points
- Listed Buildings (England)**
- I
- II
- II*
- Registered Battlefields (England)
- Registered Parks and Gardens (England)
- Ancient Woodland (England)**
- Ancient and Semi-Natural Woodland
- Ancient Replanted Woodland



Client: Hathor Property		
Scheme: Enborne Road, Newbury		
Drawing: Designations Plan	Figure No: 5	
LVIA Ltd Ref: HAT1357		
Scale: NTS@A3	Drawn: SC	Checked: JPF



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RIDGEWAY
HERITAGE CONSULTANCY

**Land East of Andover Drove and Enborne Street,
Newbury RG14 6RP
A Heritage and Archaeology Statement**



Client: Hathor Properties

Project No: RHC 2023-06

Date: 16/02/2023

Land East of Andover Drove and Enborne Street, Newbury RG14 6RP

A Heritage and Archaeology Statement

RHC Project No. 2023-06

February, 2023

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B	16.02.23	rwm	Client draft
C	24.02.23	rwm	Final version

Front cover: View looking north-east towards the northern Site boundary, from a location towards the south-west corner.

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Fig. 2: The location of the Site in relation to Enborne Street and Wash Common (approximate scale 1: 2000).

Fig. 3: Aerial image of the Site (Geoinformation Systems).

Fig. 4: View, looking south across the Site, towards the Enborne valley.

Fig. 5: Extract from John Rocque's *Map of Berkshire*, of 1761 (Royal Collections Trust).

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SUMMARY

The 3.15ha Site is located immediately to the south of the southernmost section of the Registered site of the First Battle of Newbury, of 1643. It is proposed to construct approximately 70 housing units on the Site. The designated area does not represent the full extent of the historic battlefield which may have included the present Site and surrounding area. The omission of the Site from the designated battlefield may reflect the later change in landscape character resulting from early nineteenth-century enclosure. The setting of the designated battlefield has been greatly compromised by modern development on its eastern side.

This Site is depicted on historic mapping as unenclosed common land or heathland, although a regular pattern of Enclosure Act fields was imposed from 1810. The recent landscape character of the Site contrasts with that of the battlefield. A short section of the northern Site boundary, is situated directly opposite the designated battlefield site, with the intervening thoroughfare of Enborne Street. The level topography of the designated battlefield contrasts with the valley slopes of the Site, and limits inter-visibility between the two locations, due to the effects of hillslope. Visual connections are also constrained by intervening vegetation.

The visibility of proposed dwellings from the battlefield would be further limited by recessing development from the roadside frontage of the Site, and by planting additional screening trees along the northern edge of the Site. The Site and the designated battlefield display contrasting landscape characters, and a limited spatial and visual relationship, which is represented by a narrow frontage on the northern edge of the Site. Inter-visibility between the Site and a small number of distant Grade II-listed buildings is obstructed by intervening land-forms and vegetation.

An assessment of the archaeological potential of the Site has included limited data sets of recorded finds and investigations, including prehistoric lithic finds and the results of modern investigations relating to the A34 Newbury Bypass. The Site has low potential for archaeological finds and features of all periods, with the possible exception of objects relating to the 1643 Battle. As the Site remained as unenclosed common land for much of the historical period, it does not appear to have attracted earlier activity or settlement, a conclusion supported by the results of aerial and Lidar survey.

The proposed development would result in minimal harm to the setting and significance of the adjacent battlefield site and of any other heritage assets, and would be most unlikely to impact significant archaeological remains. It would therefore be in accordance with the requirements of West Berkshire Planning Policy CS19 and the National Planning Policy Framework.

1. INTRODUCTION

1.1 In January, 2023, Ridgeway Heritage Consultancy was commissioned by Hathor Properties to undertake a Heritage Statement to support an application for planning permission for residential development on land east of Enborne Street and Andover Drove, Newbury RG14 6RN (NGR (centred) 444966 163845), hereafter ‘the Site’ (Figs. 1, 2 and 3). The Site currently comprises an area of open agricultural land, located immediately to the south of Enborne Street, and to the south-west of extensive modern housing development on Wash Common. This report comprises a comprehensive Heritage Statement, which provides a detailed assessment of the archaeological potential of the proposed development site, and of the possible non-physical heritage impacts resulting from the proposed development.

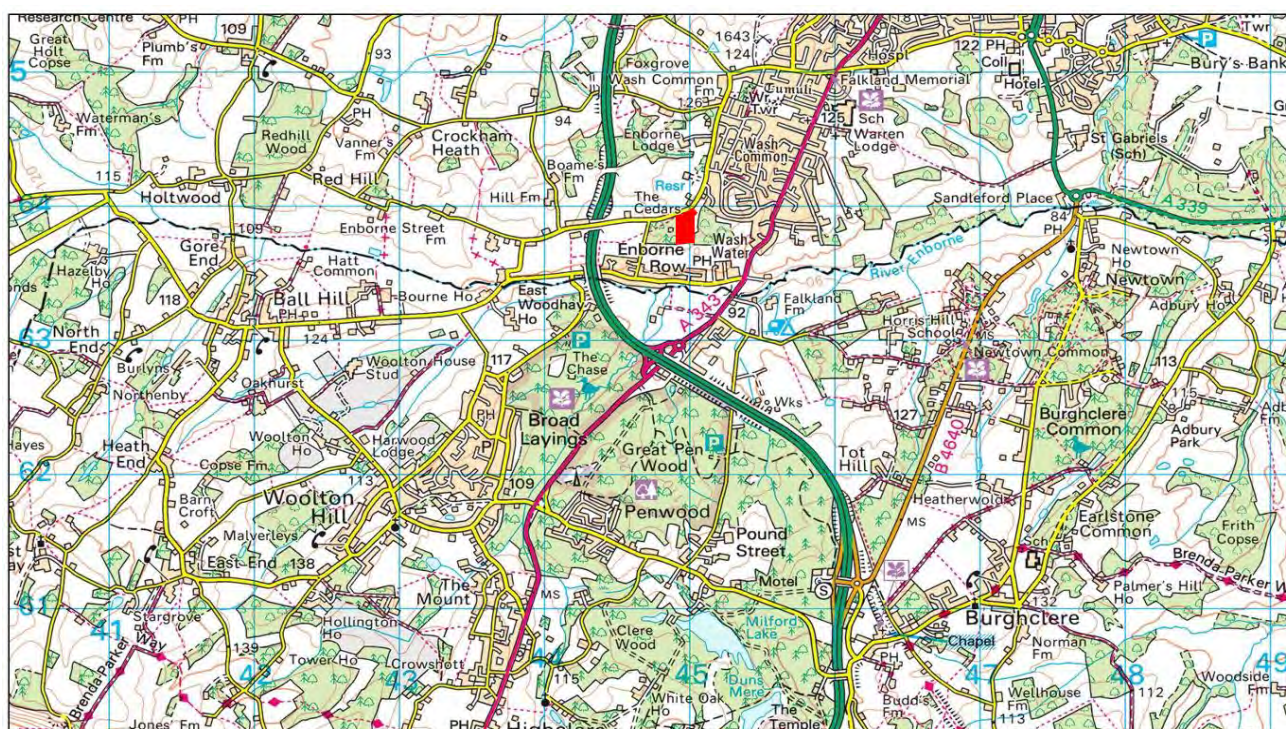


Fig. 1: Location Plan (approximate scale 1:50,000).

Location

1.2 The Site comprises a near-rectangular plot of land, of 3.15ha in area, with a circumference of 845.43m. It is bounded on its north-western side by the thoroughfare of Enborne Street, on the western side by mixed woodland and a small modern farmstead, and on the eastern side by a narrow strip of meadow within a valley bottom, with broad-leaved woodland on the opposing valley-slope beyond (Figs. 2 and 3). The southern site boundary is marked by mature

trees, with farmland beyond (Fig. 4). There are open views to the south from the Site, which include the course of the River Enborne, located 310m from the Site at the closest point (Fig. 2). The Site currently comprises an area of permanent pasture, with modern fencing, and a tall, outgrown hedgerow on its northern side.

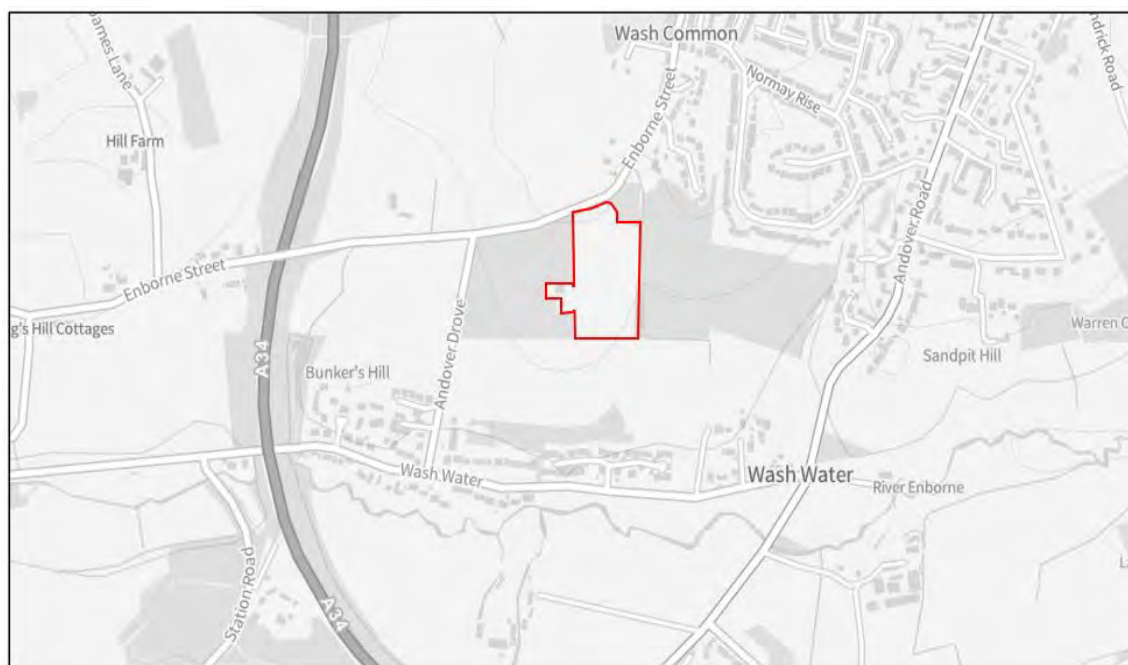


Fig. 2: The location of the Site in relation to Enborne Street and Wash Common (approximate scale 1: 2000).

- 1.3 The Site occupies a rural location, on the southern margins of Wash Common, an area of modern residential development, which effectively represents a southern, suburban extension of Newbury. The closest developments on Wash Common are located some 150m to the north-east, at the closest point (Fig. 2). The Site is located 4km to the south-west of Newbury town centre, and 360m north of the small settlement of Wash Water.

Topography

- 1.4 The Site is situated on sloping ground, on the western side of a small valley, which contains a minor tributary of the River Enborne. There are pronounced falls of slope to the east and south, with a maximum elevation of 122m above Ordnance datum (aOD) at the northern edge, falling to an elevation of 110m aOD at the south-eastern corner. Land continues to fall beyond the Site boundary, to the south, towards the course of the River Enborne, which is located 310m from the Site at the closest point. Land to the north of the Site is more level, comprising part of a small plateau or spur overlooking the river valley (Fig. 14).

Geology and Soils

- 1.5 The north-western part of the site comprises clays and silts of the London Clay Formation, a sedimentary bedrock formed 56-47 million years ago during the Palaeogene period. Within a small part of the Site, to the north-east, this comprises sands of the London Clay Formation, while to the south-east, base geology comprises clays, silts and sands of the same formation (British Geological Survey 2023). No superficial geological deposits have been identified within the Site. Soils throughout most of the Site are classified as slowly permeable, seasonally wet, slightly acid but base-rich loamy and clayey soils (UK Soils Observatory 2023).



Fig. 3: Aerial image of the Site (Geoinformation Systems).

Historic Landscape Characterisation

- 1.6 Within the West Berkshire Historic Landscape Characterisation Project (2007), the Site, and some immediately surrounding areas to south and west, are clearly identified as areas of Parliamentary Enclosure. This confirms the documentary and historic mapping evidence of the 1810 Enclosure Act and subsequent apportionments (Figs. 7 and 8). Although known to be included in the early nineteenth-century scheme of enclosure, the two land parcels immediately to the east and west of the Site are now characterised as plantation woodland. Areas to the north of Enborne Street, including parts of the Registered Battlefield Site, are characterised as ‘reorganised fields’, reflecting more recent amalgamations and changes in field boundaries.

The Scope of the Heritage Statement

- 1.7 It is proposed to construct a residential housing development within the Site, of approximately 70 units. At its northernmost extent, the Site lies directly opposite the southern boundary of the site of the First Battle of Newbury, of 1643, which has been designated by Historic England as a Registered Battlefield Site (NHLE 1000026). It is therefore possible that development on the Site may affect the setting and context of this designated heritage asset. However, there appear to be few other designated heritage assets, including listed buildings, which would be likely to have any visual connection with the proposed development Site.
- 1.8 Residential development within the Site is likely to disturb or remove any surviving archaeological features or deposits within the development footprint, and thus adversely affect their significance. It is therefore necessary to undertake an archaeological assessment of the Site, using available data sources, to determine the potential for buried remains within it. This may inform the layout of any scheme masterplan for the Site, or determine the scope of any strategy for archaeological mitigation. In order to assess the potential effects of the proposed development within the Site on the significance of the registered Battlefield site, or buried archaeological remains, it will be necessary to provide:
- An assessment, using available data sources, of the historical development of the Site and surrounding area, and its heritage significance;
 - An assessment of the existing setting of this part of the 1643 Battlefield site;
 - An assessment of the potential impact of the proposed development on the setting and historic character of the Registered Battlefield;

- An assessment of the archaeological potential of the Site, and the potential impact of development on any below-ground archaeological features;
- An assessment of the level of harm to the significance of the 1643 Battlefield site, resulting from the proposed residential development; and
- Where appropriate, recommendations for the mitigation of any identified harm.



Fig. 4: View, looking south across the Site, towards the Enborne valley.

Assumptions and limitations

- 1.9 The data used to compile this report comprises secondary information acquired from a range of different sources, only some of which have been directly examined for the purposes of this assessment. It is assumed that this data, together with that derived from secondary sources, is reasonably accurate.

Disclaimer

- 1.10 The records of the West Berkshire Historic Environment Record (WBHER) are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within WBHER

is not complete, and does not preclude the subsequent discovery of further aspects of the historic environment which are at present unknown.

- 1.11 A site visit, including an assessment of the Site, and its context and visual relationships, was made on February 2nd, 2023, in overcast conditions.

2. PLANNING POLICY CONTEXT AND GUIDANCE

2.1 This Heritage Statement has been compiled in accordance with the following statutory, planning policy and guidance documents:

- National Heritage Act 1983 (amended 2002);
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework 2012 (amended 2021);
- National Planning Practice Guidance: Conserving and Enhancing the Historic Environment (2016 revised 2021);
- English Heritage guidance: ‘Conservation Principles; policies and guidance for the sustainable management of the historic environment’ (2008);
- Historic England guidance: ‘Historic Environment good practice advice in planning: Note 2; Managing significance in decision-taking in the historic environment’ (2015a); and

Planning (Listed Buildings and Conservation Areas) Act (1990)

2.2 The 1990 Planning Act states that:

‘in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall, or as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest that it possesses (Section 66)’.

National Planning Policy Framework (2012, rev. 2021)

2.3 The Framework sets out national planning policy relating to the conservation and enhancement of the historic environment. It defines the historic environment as: “all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past activity, whether visible, buried or submerged, and landscape and planted or managed flora.” Individual components of the historic environment are considered to constitute heritage assets: “buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, because of their heritage interest”.

2.4 Key tenets of the Framework are that:

- when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater that weight should be (Paragraph 199).
- heritage significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to, or loss of, a Grade II-listed building, park or garden should be exceptional. Substantial harm to, or loss of, designated assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I or II*-listed buildings, registered parks and gardens and World Heritage Sites should be wholly exceptional (Paragraph 200).
- where a proposed development 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 (Paragraph 202).
- With regard to non-designated heritage assets, a balanced judgement will be required having due regard to the scale of any harm or loss, and to the significance of the heritage asset affected (Paragraph 203).
- 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 (Paragraph 206)

2.5 Local Planning Authorities are urged to request applicants to describe the significance of any heritage assets affected by a proposed development, including any contribution made to significance by their setting. The level of detail required in the assessment should be “proportional to the assets’ importance, and no more than is sufficient to understand the potential impact of the proposal on their significance

Planning Practice Guide (PPG)

2.6 The Planning Practice Guide (PPG) (MHCLG, 2019) clarifies this additional requirement under ‘What is the main legislative framework for planning and the historic environment?’ where it states that:

‘In addition to the normal planning framework set out in the Town and Country Planning Act 1990.....the Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest. Any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72), as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan. (MHCLG, 2019, PPG, Para. 2.)’

- 2.7 PPG states that local planning authorities may identify non-designated heritage assets, and in some areas, these heritage assets may be identified as ‘locally listed’ (DCLG et al, 2014, para. 39). These identified heritage assets may include buildings, monuments, sites, places, areas or landscapes which have a degree of value meriting consideration in planning decisions but which are not formally designated heritage assets (DCLG et al, 2014, para. 39).
- 2.8 The PPG states under ‘Why is ‘significance’ important in decision-taking?’ that: ‘Heritage assets may be affected by direct physical change, or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals’.
- 2.9 Under the discussion of ‘How to assess if there is substantial harm?’ the PPG offers: ‘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’.

Local Planning Policy

- 2.10 Local planning policies in West Berkshire are principally contained within the West Berkshire Core Strategy Development Plan 2006-2026, which was adopted in July, 2012. This comprises part of the West Berkshire Local Plan, which is now subject to public consultation, as *The Local Plan Review 2022-2039*. Within the existing policies of the Core Strategy Development Plan, Policy CS19 contains provisions for the protection and management of the historic environment.

Policy CS 19: Historic Environment and Landscape Character

- 2.11 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.
- 2.12 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, 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.

3. METHODOLOGY

General

3.1 The methodology employed for this Statement is in accordance with key professional guidance, including the *Standard and Guidance for Historic Environment Desk-Based Assessment* (Chartered Institute for Archaeologists 2014), the Historic England guidance *Conservation Principles* (2008) and Historic Environment Good Practice Advice in Planning Note 2: *Managing Significance in Decision-Taking in the Historic Environment* (Historic England 2015). Heritage settings were considered, using the methodology detailed within the current Historic England guidance *Historic Environment Good Practice Advice in Planning Note 3: the setting of heritage assets* (2015).

Sources

3.2 This Statement has involved detailed consultation of readily-available historical information drawn from documentary and cartographic sources. The major repositories of information consulted have comprised:

- National Heritage List for England (EH);
- The West Berkshire Historic Environment Record;
- Published and unpublished documentary sources;
- Historic maps and photographs;
- English Heritage Archives (EHA) and AMIE (Archives and Monuments Information, England) data;
- Online sources, including Local Plan policies and information.

3.3 A bibliography of documentary, archive and cartographic sources consulted is included in the References section of this report.

Archaeological Potential

3.4 Areas with archaeological interest are usually associated with remains buried beneath the modern ground surface, and are therefore often of undefined potential. Any assessment of their likely significance of such remains requires an estimate of the potential for the Site to yield archaeological material. Assessment of potential involves a degree of subjective interpretation, based on extrapolations of existing data sources, informed by professional

judgement. Predictability may be enhanced by the use of other data within a defined study area around the Site, and by a walkover survey to appraise its topography and conditions. From these sources of data, informed predictions can be made about the likelihood of below-ground features of archaeological interest being present within the Site.

- 3.5 To assist in predicting the significance of these assets with archaeological interest, PPG Paragraph 40 refers to the criteria set out in Scheduled Monuments (DCMS 2013), which are utilised to determine the suitability of a site for scheduling. Any heritage assets with a degree of archaeological interest which is demonstrably equivalent to that of scheduled monuments are dealt with under the policies covering designated heritage assets in NPPF.

The Significance of Heritage Assets

- 3.6 Heritage assets are defined by the National Planning Policy Framework (henceforth, ‘the Framework’; revision of 2021) 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’. The term Heritage Asset includes both designated heritage assets and assets identified by the local planning authority as possessing heritage significance (including locally-listed structures)’. Non-designated heritage assets include sites held on the Historic Environment Record, in addition to other elements of the landscape understood to have a degree of significance meriting consideration in planning decisions.
- 3.7 The assessment of the heritage value (significance) of a site determines the ways in which particular aspects of a place and different periods in its evolution contribute to, or detract from, those identified heritage values associated with the asset.
- 3.8 Heritage significance is defined in Planning Practice Guidance (Annex 2, 2021) 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 fabric, but also from its setting’
- 3.9 Current national guidance for assessing the significance of heritage assets is based on the criteria provided by Historic England (formerly English Heritage) in *Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment* (English Heritage

2008). Within this document, significance is weighed by the estimated potential for the asset to demonstrate the following criteria:

- Evidential value derives from ‘the potential of a place to yield evidence about past human activity’ (ibid, 28). It is primarily embodied by physical remains or historic fabric, but also includes buried archaeology;
- Historical value derives from ‘the ways in which past people, events and aspects of life can be connected through a place to the present’ (ibid, 28). Illustrative historical values depend on visibility in a way that evidential value does not; and ‘have the power to aid interpretation of the past [...] through shared experience of a place’ (ibid, 29). Associative historical values relate to historical connections with a notable family, person, event or movement;
- Aesthetic values derive from ‘the ways in which people draw sensory and intellectual stimulation from a place’ (ibid, 30). Aesthetic value might be generated through conscious design and artistic endeavour, fortuitous and organic change, and the relationship of structures and materials to their setting; Communal value is tied to historical (associative) value and aesthetic value, deriving from ‘the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory’ (ibid, 31);
- Communal values may be commemorative, symbolic or social. The latter is typically ‘associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence,’ and might only be articulated when the resource is under threat (ibid, 32).

3.10 Further information on good practice in implementing historic environment policy in the NPPF is provided within the guidance Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015a). This document provides advice on the assessment of the significance of heritage assets in support of applications for planning permission, and emphasises that the information required regarding heritage significance should be no more than would be necessary to inform the planning decision.

Sectoral Guidance

3.11 This Statement has been compiled in accordance with the following statutory, planning policy and guidance documents:

- National Heritage Act 1983 (amended 2002);
- Planning (Listed Buildings and Conservation Areas) Act 1990;
- National Planning Policy Framework 2012 (revised 2021);
- National Planning Practice Guidance: Conserving and Enhancing the Historic Environment 2016 (revised 2021);
- English Heritage guidance: ‘Conservation Principles; policies and guidance for the sustainable management of the historic environment’ (2008);
- Historic England guidance: ‘Historic Environment good practice advice in planning: Note 2; Managing significance in decision-taking in the historic environment’ (2015a); and

Assessing Levels of Impact

Magnitude of Impact

3.12 The determination of the magnitude of change is based on the current level of survival, or condition, of the receptor. The variable factors which determine the magnitude of change include the vulnerability or sensitivity of the site or feature to change. The criteria commonly used to determine the magnitude of impact are as described in the following table:

Magnitude of Impact	Description
Major	The proposed development would cause a large change to existing environmental conditions. Complete destruction of the site or feature. Change resulting in a fundamental change to the ability to understand or appreciate the asset and its context and setting.
Moderate	The proposed development would cause noticeable change to existing environmental conditions. Change resulting in appreciable change to the ability to understand or appreciate the asset and its context and setting.
Minor	The proposed development would cause small change to existing environmental conditions. Change resulting in small change to the ability to understand or appreciate the asset and its context and setting.
Negligible	The proposed development would result in no discernible change to existing environmental conditions. Negligible change or no material change to the site or feature.

	No change to the ability to understand or appreciate the asset and its context and setting.
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Table 1: Criteria used to determine the level of impact.

Significance of Impact

3.13 The significance of impact and environmental effect is determined by two variables:

- The importance or significance of the receptor; and
- The magnitude of change affecting the receptor.

Environmental effects may be either adverse or beneficial, depending on the nature of the impact.

Receptor sensitivity/value	Magnitude of Impact			
	Major	Moderate	Minor	Negligible
Very high	Substantial	Substantial	Moderate	Slight
High	Substantial	Moderate	Slight	Negligible
Medium	Moderate	Slight	Negligible	Negligible
Low	Slight	Negligible	Negligible	Negligible

Table 2: Criteria used to determine the significance of impact.

4. THE SITE: ITS HISTORY, DEVELOPMENT AND SIGNIFICANCE

4.1 The earliest historic mapping of the Site provides little indication of its earlier historic development. Rocque’s map of 1761 (Fig. 5) is the earliest map of sufficient scale to depict the site and its surroundings in any degree of detail. While elements of the modern road network are identifiable on this map, the Site itself appears to comprise an amorphous part of an area of unenclosed common land or heathland, and no distinct boundaries can be ascertained. On Stanley’s map of c. 1810 (Fig. 6), the line of the modern Enborne Street can be readily identified, although land to the south, including the Site, appears to have remained part of an unenclosed area of common land. This is identified on Stanley’s map as ‘Newbury Wash’, with an adjoining area of steeper land overlooking the River Enborne as ‘Trundle Hill’. Documentary evidence confirms that manorial rights over Newbury Wash were acquired by the Newbury Mayor and Corporation in 1627 (Page and Ditchfield (eds) 1924, 169). Several of the areas of woodland depicted on Stanley’s map are identifiable on modern mapping. The locations of Poplar and Peregrine Cottages, on the northern side of Enborne Street are depicted on both Rocque’s and Stanley’s maps, and identify these as historic buildings.



Fig. 5: Extract from John Rocque’s *Map of Berkshire*, of 1761 (Royal Collections Trust).

4.2 Present land boundaries are depicted in detail on the Enborne Apportionment Map of 1815, where the site is represented by two adjacent land parcels (Fig. 7). Both of these were occupied

by a Richard Townsend Esq, as was the land parcel immediately to the east, which is now woodland. Immediately to the west of the Site, the presently enclosed area of woodland is depicted as open land apportioned to Letitia Finney, with Poor Allotments immediately to the south. The regular, straight field boundaries depicted on this and later maps strongly suggest an earlier scheme of planned enclosure, and it is documented that the Site and surrounding area were included within an Enclosure Act of 1810, with an apportionment dated to February 25th 1815 (Page and Ditchfield (eds) 1924, 170).



Fig. 6: Extract from William Stanley's Map of Newbury, of c. 1810 (British Library).

4.3 By the time of the large-scale Ordnance Survey map of 1873, the site is depicted much as on the earlier Apportionment map of 1815 (Fig. 8). However, by this time the two land parcels within the Site had been amalgamated, and the formerly open land of the enclosure immediately to the west appears to have reverted to heathland or waste ground, while that to the east had become an area of established mixed woodland. By the time of the Ordnance Survey map of 1937, the boundaries of the Site and surrounding land parcels are largely those of the present day, with an area of broadleaf woodland established immediately to the west of the Site and the removal of field boundaries within the land immediately opposite the Site and to the north of Enborne Street (Fig. 9).

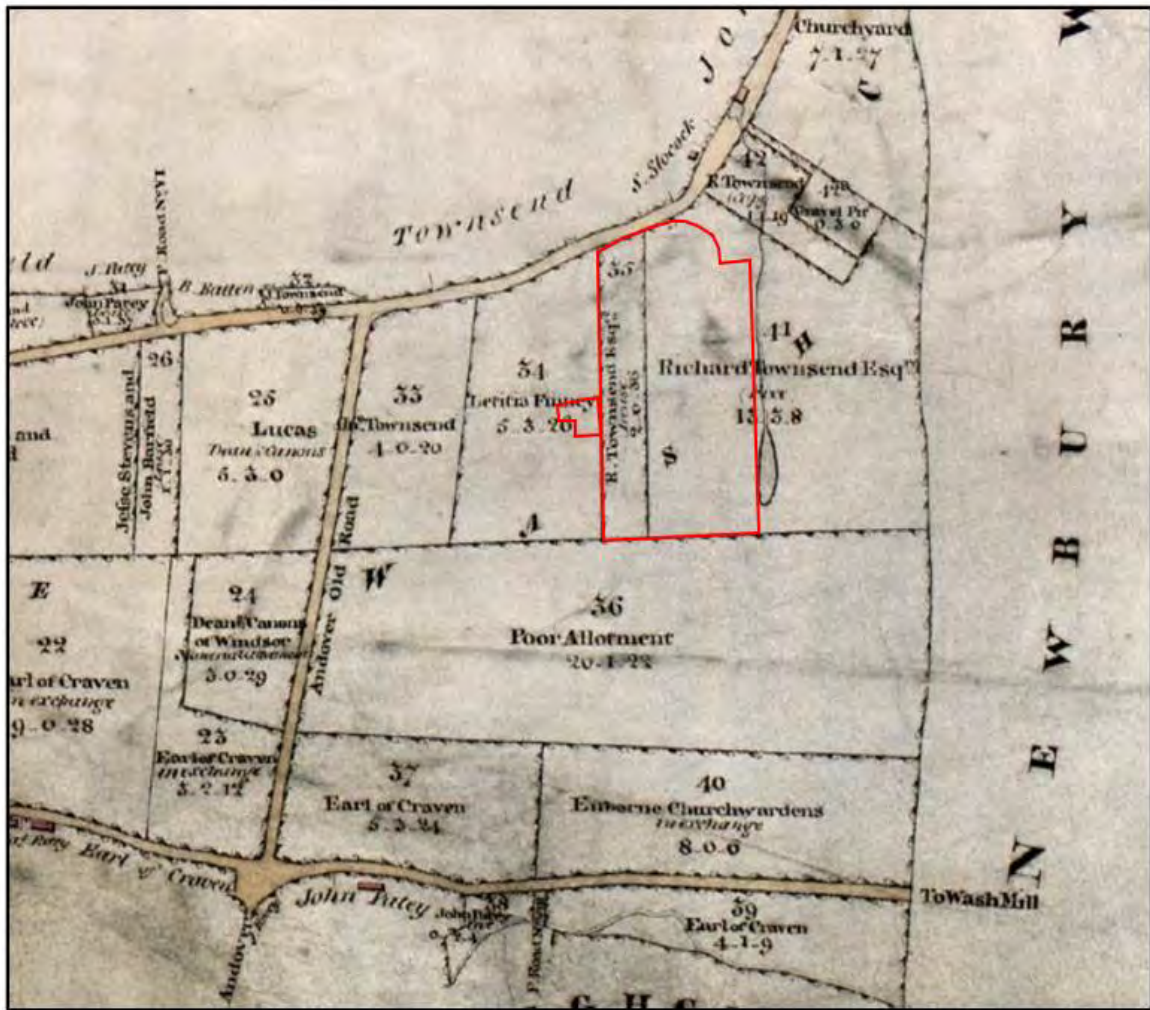


Fig. 7: Detail from the Enborne Apportionment Map, of 1815 (Berkshire Records Office).

4.4 The evidence of historic mapping indicates that the Site in its current form and extent is largely a product of early nineteenth-century enclosure, and that this land formerly comprised unenclosed common land. There is no documentary or mapping evidence to indicate that the Site contains a significant historic feature or land boundary, or that it includes an area of settlement or other significant human activity. It appears likely that it remained as unenclosed or common land throughout much of the historical period, and there is no aerial photographic or Lidar evidence to suggest earlier cultivation or any other activity.

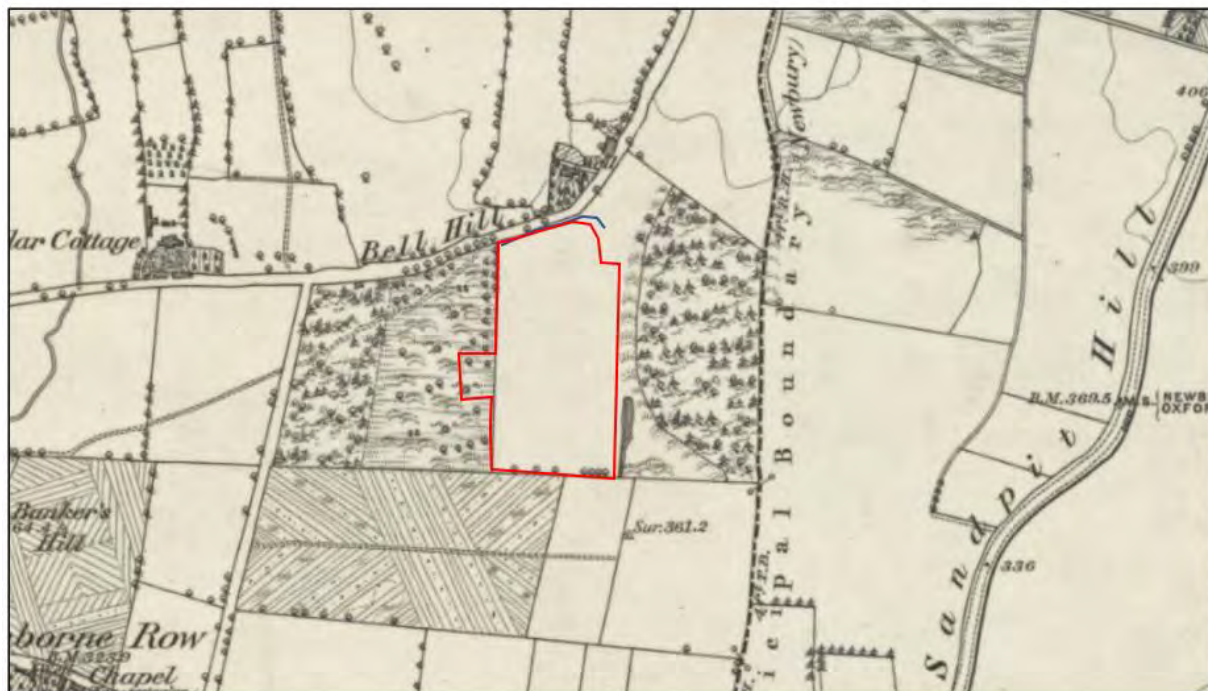


Fig. 8: Extract from the Ordnance Survey England and Wales 6-inch series 1842-1952, surveyed in 1873 (National Library of Scotland).

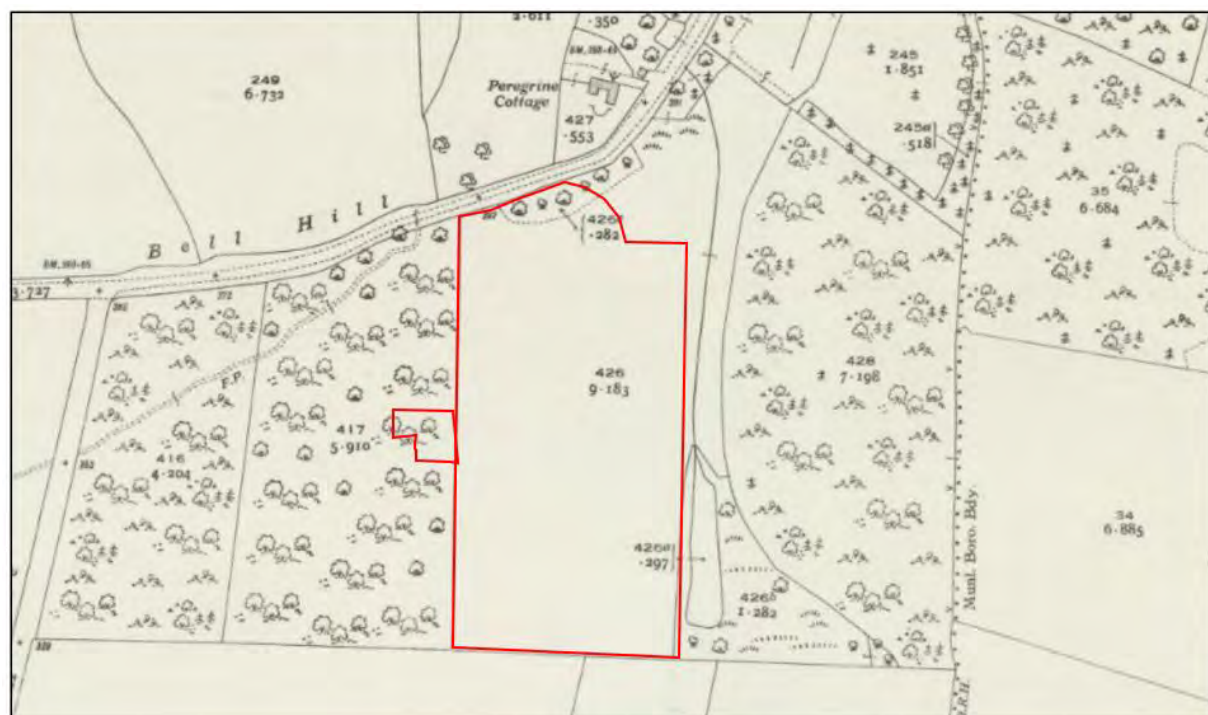


Fig. 9: Extract from the Ordnance Survey 25-inch England and Wales Series 1842-1952, surveyed 1937 (National Library of Scotland).

The Site of the First Battle of Newbury 1643

4.5 On September 19, 1643, Prince Rupert arrived at Newbury, at the head of a Royalist Army, in an attempt to block the passage of the Parliamentary army on its way to London. The Parliamentarian forces, under the command of Robert Devereux, Third Earl of Essex, had previously evaded Royalist forces during their march from Gloucester. The two armies each comprised approximately 15,000 men, although the Royalists enjoyed a distinct superiority in terms of cavalry. Prince Rupert wished to await the arrival of the Royalist baggage train before committing to battle, but the King urged him not to delay.

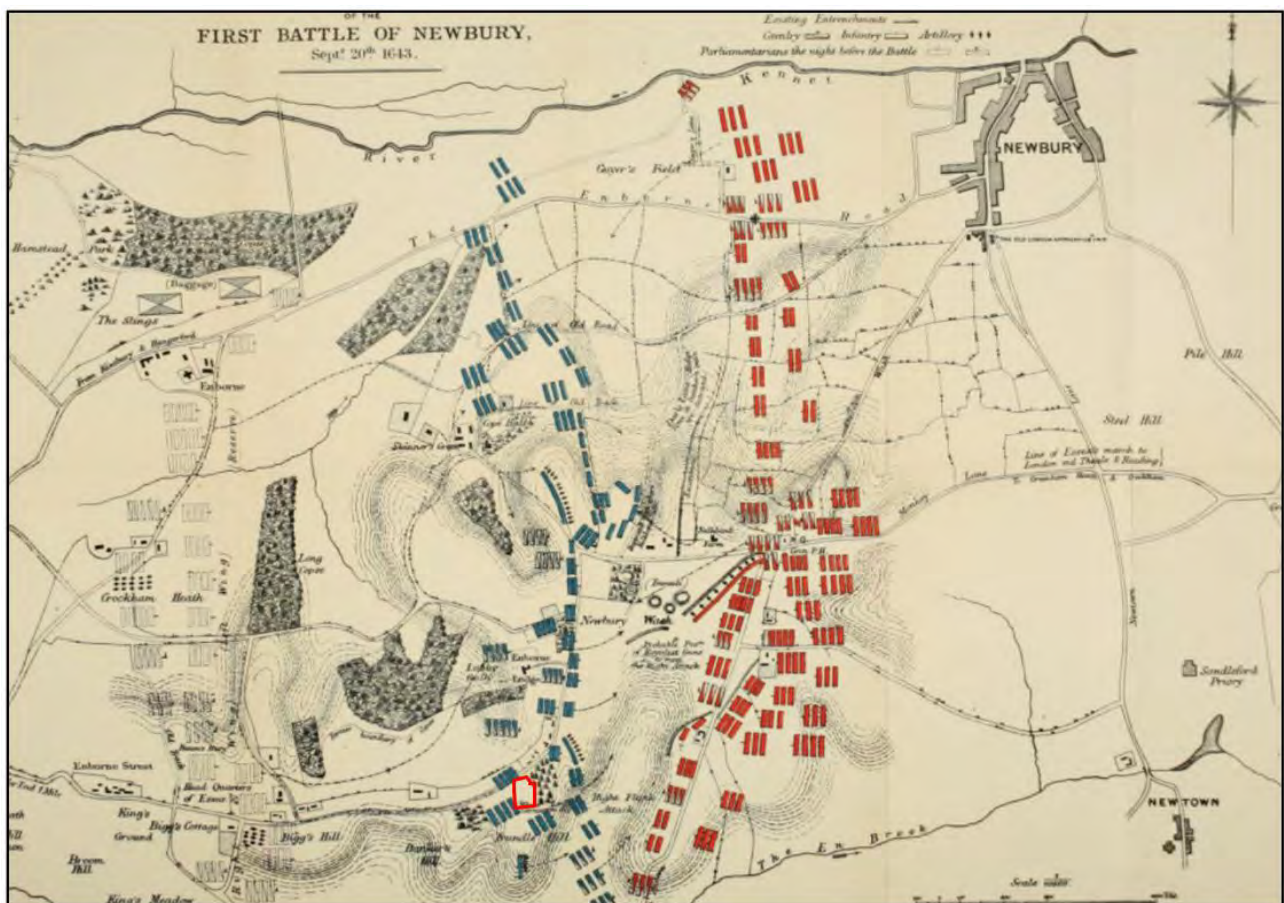


Fig. 10: Deployment of the Parliamentary (blue) and Royalist forces (red), at the First Battle of Newbury, with the location of the Site (after Money 1881).

4.6 Early on the morning of September 20, the two armies deployed along a long front, which extended between the River Kennet in the north and the River Enborne in the south, and included parts of the town (Fig. 10). Prince Rupert’s cavalry was deployed within the area of Newbury Wash, just to the north of the River Enborne, and directly opposite the current Site. To the centre of the Royalist formation, Sir John Byron’s foot-soldiers were supported by cavalry. On the Parliamentary side, Sir Philip Stapleton’s foot-soldiers, supported by cavalry,

were located just to the north of the River Enborne, and opposite Prince Rupert's forces. Philip Skippon's foot-soldiers held the Parliamentary centre, with the support of the London Trained Bands in reserve.



Fig. 11: A nineteenth-century depiction of cavalry at the First Battle of Newbury (Newbury Town Council).

- 4.7 During the course of the battle, the densely enclosed nature of the surrounding landscape gave considerable advantage to Parliamentary foot-soldiers, and limited the effectiveness of Royalist cavalry charges (Figs. 10 and 11) (Barratt 2005). After initial loss of ground, the Parliamentary centre was able to advance and gain control of a number of vantage points, including the hotly-contested area around Round Hill, some 1.2km to the north of the Site. The battle continued until evening, with considerable losses on both sides. With Royalist forces running low on powder and ammunition, the King withdrew his forces into Newbury, under cover of darkness. The Parliamentary army withdrew along the Kennet valley, towards Reading, where they arrived on September 22, after a number of small skirmishes en route.
- 4.8 The documentary sources relating to the battle clearly indicate that the Site and surrounding area comprised part of the operational battlefield, and were integral to the events associated with it, most particularly the deployment of Prince Rupert's cavalry and the opposing Parliamentary forces (Fig. 10). In view of the documentary evidence, it is unclear why the Site has not been included within the designated area of the battlefield. This represents an important distinction in terms of the heritage constraints affecting the Site. However, historic mapping evidence confirms that there has been a considerable change in landscape character

within areas to the south of Enborne Street, since the time of the Battle, principally due to the effects of early nineteenth-century enclosure. This has created a regular layout of field boundaries and the establishment of areas of woodland (Figs. 7-9), which differ radically from the open heathland or common land of 1643.

5. THE RELATIONSHIP BETWEEN THE SITE AND THE DESIGNATED BATTLEFIELD

5.1 Documentary evidence has established that the current Site and surrounding area are integral to the 1643 Battlefield, and were surrounded by Royalist and Parliamentary deployments, both to east and west (Fig. 10). Plans of the designated area of the battlefield clearly indicate that this represents only a limited part of the historic site (Figs. 12 and 13). The principal reason for this anomaly is that large parts of the historic battlefield, particularly on the eastern side, including areas of Royalist deployment, are now occupied by extensive post-War housing developments to the east of Enborne Street. On the designation map published by Historic England (Figs. 12 and 13), the southern part of the battlefield site is represented by a narrow strip of land immediately to the west of Enborne Street and bordering the modern residential development of Wash Common. This elongated area, the southern tip of which represents the interface between the Site and the designated battlefield, therefore represents only an undeveloped remnant of the battlefield, which otherwise would have extended considerably further to the east, possibly to the line of the Andover Road (Figs. 10 and 12). In view of the available evidence, it is unclear why the designated area was not continued further to the south.

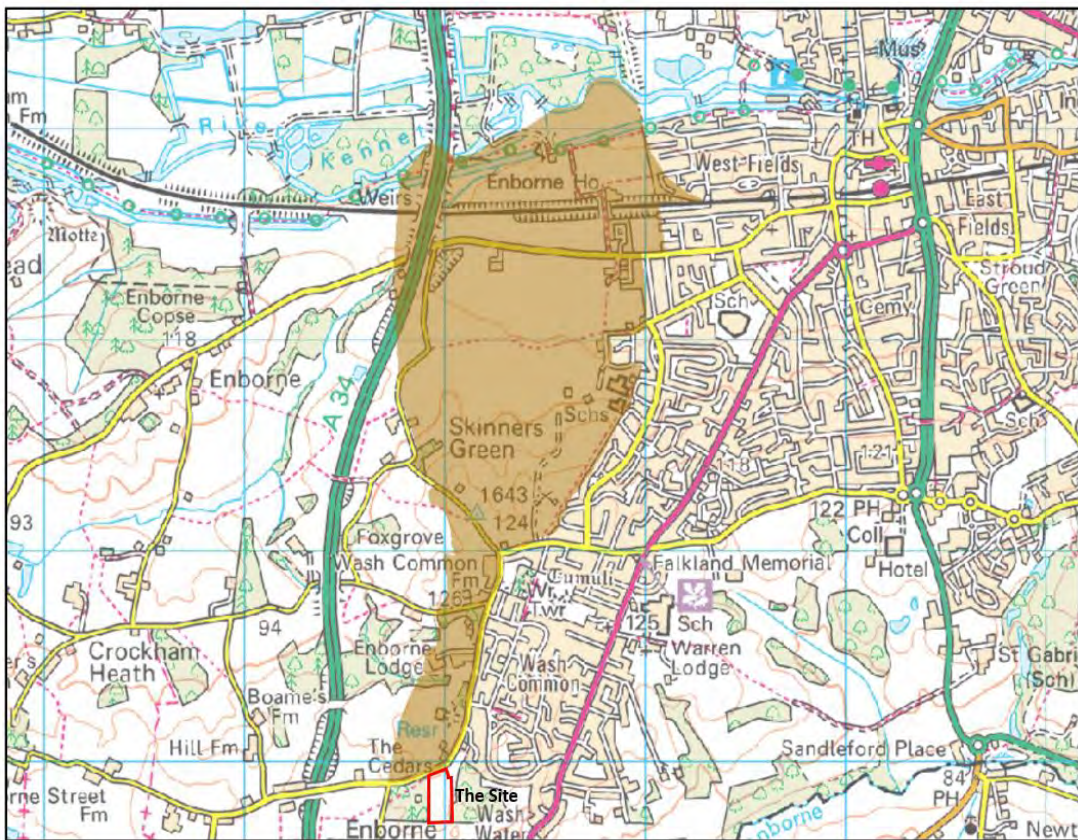


Fig. 12: Plan of the designated Battlefield, with the location of the Site(after Historic England).

5.2 On this basis, the boundaries of the Registered Battlefield must be regarded as relatively arbitrary. Any concepts of setting in this case become largely meaningless when the proposed Site comprises as much a part of the historic battlefield as those adjoining areas which fall within the formal designation. Furthermore, this designation is recognised as incomplete, and represents only a limited proportion of the historic battlefield. While the undeveloped Registered area retains an open, rural character, it is closely bordered on its eastern side, and over a distance of some 3.5km, by modern developments, which both considerably compromise its setting and detract from the ability to appreciate and understand the topography and conduct of the battle.

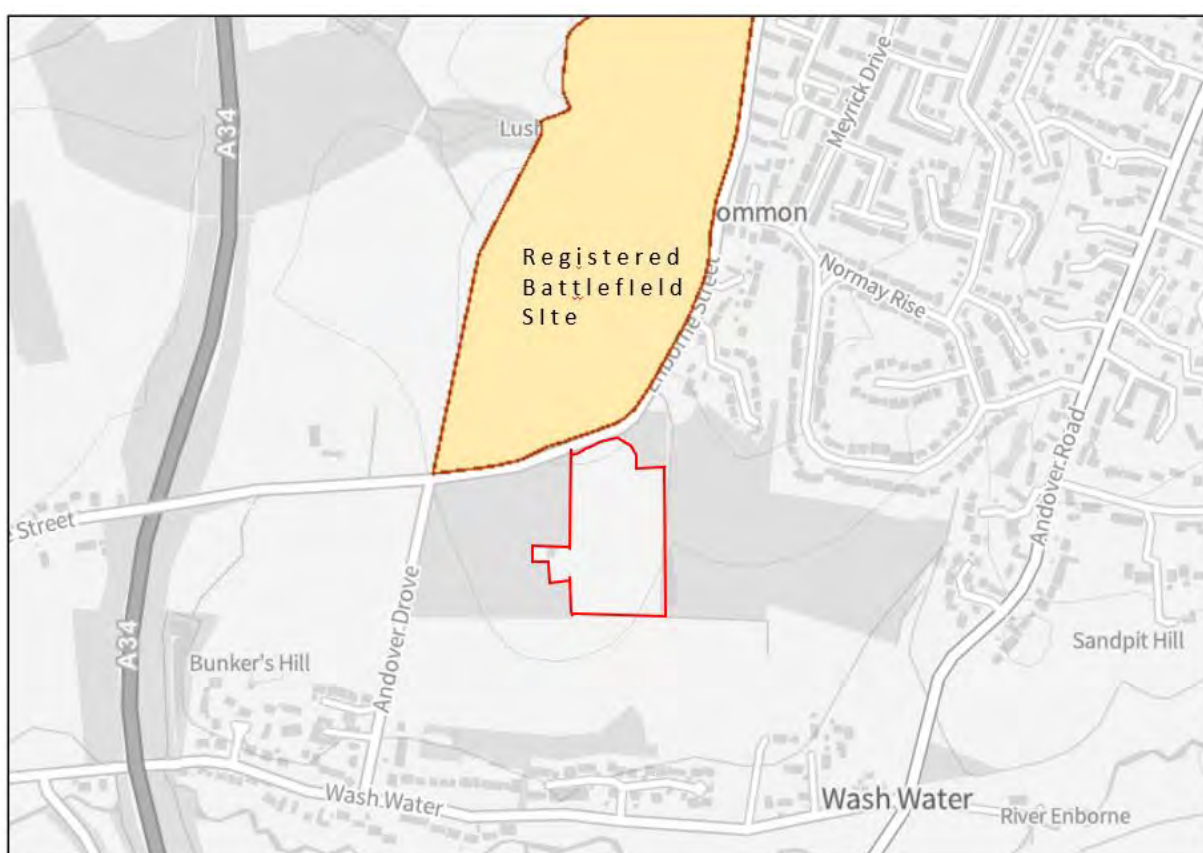


Fig. 13: The spatial relationship between the Site and the southernmost extent of the Registered Battlefield.

Assessing Setting Impact

5.3 The interface between the Site and the southern margins of the Registered Battlefield is tenuous. On the northern margins of the Site facing Enborne Street, only a distance of 60m of the Site frontage directly faces the designated area of the Battlefield (Fig. 13). It is separated from this by the thoroughfare of Enborne Street, representing an intervening distance of some 15m. The Site does not therefore directly abut the designated Battlefield, and this limited

northernmost frontage is the only part of the Site which has a direct visual relationship with it.

- 5.4 There is very limited visual connection between the northern part of the Site and the southernmost margins of the Registered Battlefield. This lack of inter-visibility principally reflects the effect of topography, with the Registered area to the north largely characterised by level terrain, and the Site to the south displaying southward and eastward-facing valley slopes (Figs. 14, 16, 17 and front cover). The effects of hillslope mean that only the northernmost part of the Site is technically visible from the southern margins of the Registered Battlefield, and that the Battlefield is not visible from areas further downslope within the Site (Figs. 15, and 16-18).



Fig. 14: View, looking north across the Registered Battlefield site, from its southern margin, just north of Enborne Street, showing level terrain.

- 5.5 Inter-visibility is also limited by the intervening thoroughfare of Enborne Street. The field immediately north of Enborne Street, within the designated battlefield, is bounded on its southern side by a dense hedgerow which restricts visibility (Fig. 15). In addition, the northern edge of the Site is lined by a row of tall planted trees, which greatly constrain inward and outward views, although these do not currently comprise a complete or entirely continuous

visual barrier (Figs 16-18). As a result of these factors, there are no direct views of the designated battlefield from ground-level within the Site, and similarly there is no direct visibility of the Site from the southern margins of the designated area of the battlefield (Fig. 15).

5.6 Any relevance of the Site to the designated battlefield is considerably compromised by its current landscape character. The unenclosed heathland on which much of the battle took place within the surrounding area, and which is confirmed by the evidence of historic mapping (Figs. 5 and 6), has been completely changed by the effects of early nineteenth-century enclosure and subsequent agricultural improvements (Figs. 7-9). Similarly, the densely-enclosed character of much of the battlefield to the north, as evidenced by Rocque’s map of 1761 (Fig. 5), has been changed by the amalgamation of fields and the removal of hedged boundaries, so that it now has an altogether more open character than at the time of the battle (Fig. 14).



Fig. 15: View, looking south towards the Site, from the southern boundary of the designated battlefield.

5.7 Given that roof-lines and the upper storeys of housing units would be technically visible through, and above, screening vegetation from the southern margins of the designated battlefield, it is proposed to recess the proposed housing units away from the frontage of

the Site, leaving an intervening green corridor, which will permit additional plantings. This would limit the visibility of housing units within views from the north (Fig. 4), which would assist in mitigate any visibility of the proposed development from the battlefield site and intervening roadway.

5.8 In addition, the existing trees along the northern side of the Site would be augmented by additional tree plantings, to further screen the Site from inward views from the designated battlefield. In this way, the proposed development would be visually isolated from the designated battlefield, although it should be emphasised that the designated boundaries in this case are somewhat arbitrary, and not a meaningful representation of the historic battlefield.



Figs. 16 and 17: Views looking north from the Site from(top) close to its northern edge and (bottom) from a downslope location further to the south.

Other Potential Impacts to Heritage Settings

5.9 There are very few designated heritage assets within the wider environs of the Site. Two Grade II-listed buildings are located at respective distances of 1km and 1.15km to the north-east, and any visual connection between these and the Site is obstructed by the effects of distance and by intervening vegetation and built form. In particular, the dense mature vegetation around the north-eastern Site boundary effectively screens any visual connections in this direction. The Grade II-listed Wheatlands Farmhouse (NHLE 1291091) is located at a distance of 780m to the north, and the Grade II-listed Boames Farmhouse (NHLE 1220250) is located 940m to the north-west. In neither case is there any visual connection with the Site, due to the effects of distance and intervening vegetation. There are no designated heritage assets within the small settlements of Enborne Row or Wash Water, to the south of the Site.



Fig. 18: View looking north-east from within the Site, towards the designated battlefield site.

6. AN ARCHAEOLOGICAL ASSESSMENT

- 6.1 Recorded archaeological data within and surrounding a one-kilometre radius of the Site were collated, to provide a wider understanding of trends and context within the surrounding area. No archaeological finds or features have been recorded within the Site itself. The range and quantity of archaeological data within the one-kilometre radius assessment area were remarkably limited, with most data-points representing historic structures or early modern features. These have not been included in the lists of finds or investigations presented in Tables 3 and 4 below. Of these data points, only 22 represented finds or investigated features of relevant archaeological interest. This limited range of entries was restricted to those recorded finds and features of post-medieval and earlier date, some of which may relate to buried archaeology and thus inform an assessment of the potential of the Site (Fig. 19). Such a small sample did, however, display some wide variations of date and type, but was not of sufficient statistical validity to permit any confident conclusions regarding the archaeological potential of the Site itself. It is probable that this local dearth of archaeological data simply reflects an historically low level of development and investigation within the surrounding area, and this possibility is strengthened by the high proportion of archaeological data resulting from investigation and survey associated with construction of the A34 Newbury Bypass (Birbeck 2000).
- 6.2 Recorded finds, mostly antiquarian, from the area broadly described as Wash Common (Fig. 19, Nos. 19-24) suggests some limited potential for worked flint of prehistoric date within the site. In particular, the Neolithic flint scatter recorded on Wash Common (Fig. 19, No. 22) may indicate transient activity of this date within the wider area, although there is otherwise very little correlative data (See Bradley 2014, 89). The finds of a polished stone axe and two perforated stone maceheads (Fig. 19, Nos. 22 and 23) within apparently close proximity, are of interest, and might suggest the possibility of later Neolithic settlement on the higher ground between the Kennet and Enborne valleys. The antiquarian recording of Palaeolithic flint tools (Fig. 19, Nos. 19-21) may be from gravel quarries, and thus presumably stratified within Pleistocene or later Devensian deposits, rather than from secondary contexts, with the high-level Enborne terraces recognised as a possible key area (see Wenban-Smith 2014, 40, Table 3.9). Such deposits are not recorded within the Site itself (British Geological Survey 2023), and any Palaeolithic items might therefore be present as redeposited material, although the likelihood of such finds is considered to be low.

No.	Location	NGR (SU)	Description	Reference
1.	20 Battery End	4570 6475	No archaeological activity	BWC06
2.	Falkland Cricket Club	4515 6437	No Archaeological activity	PRN 13410
3.	Wash Common Water Tower	4539 6478	No archaeological activity	PRN 12320
4.	Bagnor Road (A34 Bypass)	4544 6894	RB Farmstead and field system	Birbeck 2000
5.	Curridge Road	4710 7125	Undated hearth	Birbeck 2000
6.	Swilly Copse	4684 7040	Bronze Age globular urn	Birbeck 2000
7.	Swilly Copse	4684 7040	Bronze Age posthole	Birbeck 2000
8.	Wash Common Recreat'n Ground	4550 6480	Undated site	WCN95
9.	Enborne Lodge School	4500 6540	Modern features	Bradley 2000
10.	Curridge Road	4725 7115	Late Neolithic flint scatter	Birbeck 2000
11.	Great Pen Wood	4520 6260	Roman pit cluster	Birbeck 2000
12.	Wheatlands Lane	4440 6470	Med pottery & kiln waste	Birbeck 2000
13.	Enborne Street	4440 6390	Medieval ditches and gullies	Birbeck 2000
14.	Elmore Plantation	4492 6777	Possible small RB farmstead	Birbeck 2000
15.	Enborne Street	4437 6405	Natural geophysical anomalies	Noel 1993-4
16.	Blossom's Field, Wash Common	4560 6440	Lead shot & copper alloy buckle	Sabin 2008
17.	Hill's Pightle	4620 7000	Medieval pits and ditches	Birbeck 2000
18.	4 Wheatlands Lane	4510 6480	Modern activity	Mayer 2004

Table 3: Recorded data from the Historic England Excavations Index within and surrounding a one-kilometre radius of the Site.

No.	Location	Description	Date	NGR (SU)	HER Ref.
19.	Sandpit Hill	Handaxe	Palaeolithic	4530 6370	9114
20.	Sandpit Hill	Handaxes	Palaeolithic	4560 6400	9111
21.	Wash Common	Handaxe	Palaeolithic	4500 6300	10675
22.	Wash Common	Polished Stone Axe	Neolithic	4500 6300	10675
23.	Sandpit Hill	Two Perforated Stone Maceheads	Neolithic	4530 6370	1548
24.	Wash Common	Flint scatter	Neolithic	4500 6300	10675
25.	Reddings Copse	Pottery scatter and possible kiln	medieval	4440 6430	15464
26.	Warren Road	Gilded copper alloy object	medieval	4580 6466	14428
27.	Wash Common	Metal detector finds of lead shot and C17 buckle	post-med	4500 6410	15542
28.	Mill at Wash Water	C 19 finds of human skeletons	?Civil War	n/a	16153

Table 4: Recorded HER archaeological data within and surrounding a one-kilometre radius of the Site.

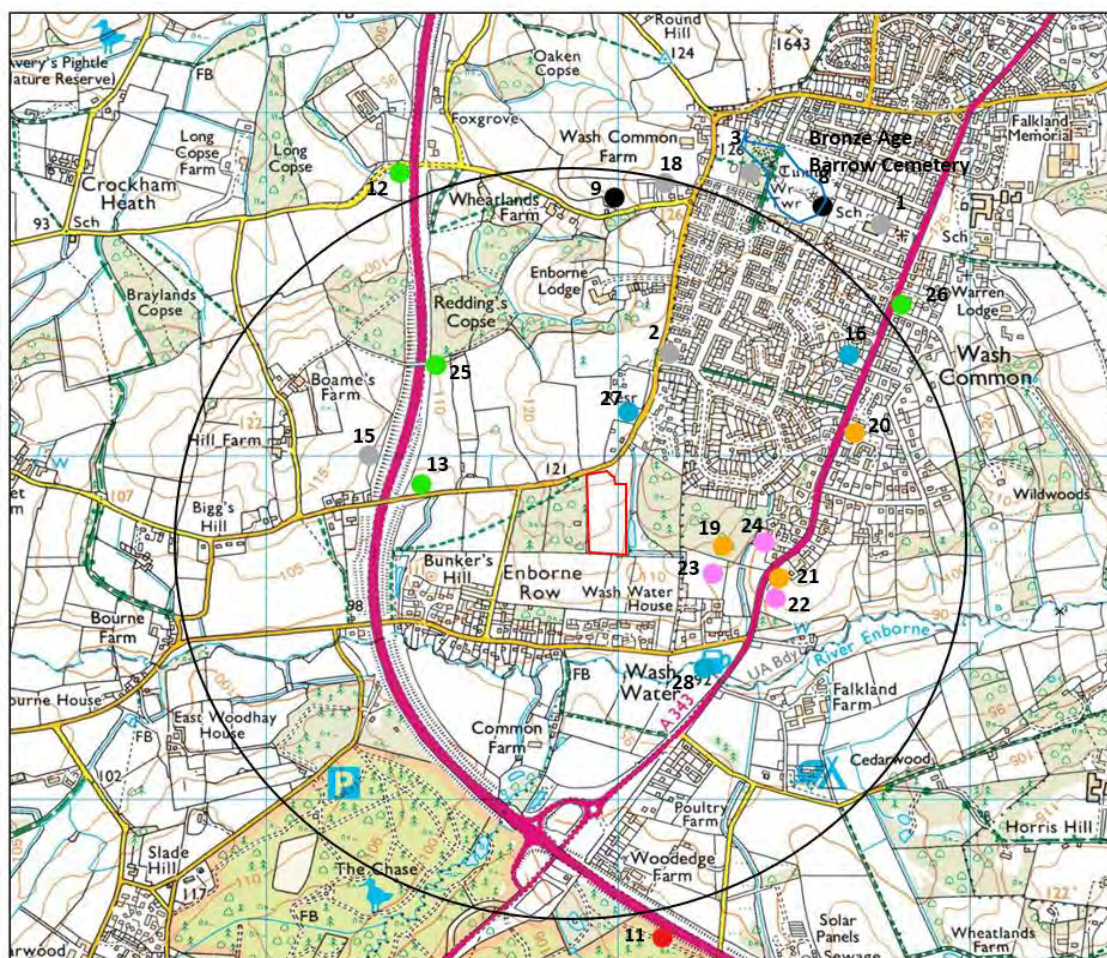


Fig. 19: Plan of the one-kilometre radius assessment area surrounding the Site, with locations of recorded finds and investigations (Nos. 1-28) (grey=no archaeological evidence; black=undated; orange=Palaeolithic; lilac=Neolithic; red=Roman; green=medieval and blue=post-medieval).

6.3 The Wash Common Barrow Cemetery is located one kilometre north-east of the Site (Fig. 19), and comprises part of a pattern of small barrow groups located along the southern side of the Kennet Valley. The presence of the barrows does not necessarily signify potential for Early Bronze Age settlement within or around the Site, which is more likely to have been located within the Kennet valley, to the north (but see Bradley 2014, 89-90). Evidence of later Bronze Age activity was recorded by the A34 Newbury Bypass investigations to the north of the assessment area (Table 3, Nos. 6 and 7, not illustrated), and may relate to a wider pattern of activity within the Kennet valley.

6.4 The investigations associated with the construction of the A34 Newbury Bypass have provided some additional data (Birbeck 2000), although the range and quantity of these is not great. Roman-period finds and features are surprisingly few, and restricted to a group of pits

in Great Pen Wood, to the south of the Site (Fig. 19, No. 11). Other Roman-period sites have been recorded to the north of the assessment area, including possible farmstead settlements (Table 3, Nos. 4 and 14, not illustrated). Most dateable remains are of the medieval period, including a possible kiln site at Wheatlands Lane (Fig. 19, No.12), and include evidence of field divisions and possible farmstead settlement (Fig. 19, Nos. 13 and 17). This evidence is complemented by the recorded field boundaries and evidence of ridge and furrow cultivation recorded by aerial survey (Fig. 20), although this does not appear to have been extensive, and the evidence of historic mapping suggests that the Site and surrounding areas remained as open common land throughout much of the medieval and post-medieval periods.

6.5 A small group of post-medieval finds are of interest, in view of the battlefield context. These include lead shot and dress fittings recovered by metal detecting, which are likely to derive from the battle (Fig. 19, Nos. 16 and 27). An antiquarian record of human skeletons uncovered at the mill at Wash Water (Fig. 19, No. 28) invites speculation regarding battle casualties, although there is clearly no way of confirming this.

6.6 The results of aerial and Lidar survey do not greatly extend knowledge of the archaeology of the Site and its surroundings (Figs. 20 and 21). The National Mapping Programme plot of the site and surrounding area depicts a few cropmark/soilmark features representing field boundaries and plough-degraded ridge and furrow features (Fig. 20). There is no other cropmark evidence of archaeological activity surrounding the Site. Similarly, incomplete Lidar survey (Fig. 21) provides very little additional data, with the exception of a section of undated ditch within the woodland to the east of the Site, which may conceivably be a Civil War feature.



Fig. 20: Plot of recorded aerial photographic features around the Site (Historic England).



Fig. 21: Plot of Environment Agency 1m-resolution Lidar data to the east of the Site.

6.7 The generally low levels of archaeological activity around the Site are suggested by the comparatively high proportion of recorded investigations which have produced no evidence (Fig. 19, Nos. 1, 2 and 3). Tentative analysis of a small data set suggests that activity of earlier periods is largely located to the north of the assessment area, towards the Kennet valley, and includes the sites of Curridge Road, Bagnor Road, Elmore Plantation and Swilly Copse (Table 3, Nos. 4, 5, 6, 7, 10 and 14; not illustrated) (Birbeck 2000). Historic mapping indicates that the Site and surrounding area remained as an area of heathland or common ground until the early nineteenth century (Figs. 5 and 6), and this is likely to have been the case throughout

much of the historical period. There is nothing to suggest evidence for medieval settlement or cultivation, and any potential for the presence of below-ground remains of this and earlier periods within the Site is accordingly assessed as low. There is some limited potential for the presence of earlier prehistoric flintwork, although this is most unlikely to be associated with stratified remains. The Site is considered to have moderate potential for finds of post-medieval date, most particularly relating to the Battle of 1643, although these would also not relate to any stratified or below-ground features. The results of this assessment strongly endorse that made for the proposed site of a solar farm, to the north of Enborne Row and immediately to the south of the present Site (Avalon Heritage 2021).

- 6.8 This assessment of archaeological potential is subject to the availability of data and the limitations and methodologies outlined in Paragraphs 1.9, 1.10, 3.4 and 3.5 of this report. Consequently, the archaeological potential of the Site cannot be stated with absolute confidence, and it is possible that this assessment may be tested by geophysical survey or field evaluation, subject to the requirements of the local planning authority archaeological advisor.

7. CONCLUSIONS

- 7.1 The 3.15ha Site is located immediately to the south of Enborne Street, and directly opposite the southernmost section of the Registered site of the First Battle of Newbury, of 1643. It is proposed to construct approximately 70 housing units on the Site. The designated area does not represent the full extent of the historic battlefield, as much of its eastern part has been extensively developed as post-War housing. In addition, documentary evidence indicates that military deployments, and much of the conflict to the south, extended to the River Enborne and included the present Site and surrounding area. The current boundaries of the designated battlefield site are therefore considered to be somewhat arbitrary, and its setting on the eastern side has been greatly compromised by the extent of modern development. Historical changes to field boundaries within the battlefield site have also altered its historic character.
- 7.2 This Site is depicted on eighteenth-century mapping as unenclosed common land, or heathland. This was subject to enclosure from 1810, when a pattern of regular, rectilinear field boundaries was imposed. The landscape character of the Site is therefore of comparatively recent date, and contrasts with that of the battlefield site just to the north. It is probable that the Site comprised part of an area of unenclosed or common land throughout much of its earlier history. The later changes in landscape character to the south of Enborne Street may explain why the Site and surrounding areas were not included within the designation boundary of the battlefield site.
- 7.3 A short section of the northern Site boundary, measuring some 60m in length, is situated directly opposite the southernmost part of the designated battlefield site, and is separated from it by the intervening thoroughfare of Enborne Street. The adjoining section of the designated battlefield is comparatively level, with some open views to the north, whereas the Site slopes downward quite strongly to the south and east. As a result of this contrasting topography, there is little inter-visibility between this part of the battlefield and most of the Site, due to the effects of hillside. Visual connections are also constrained by intervening vegetation, with a dense roadside hedgerow on the battlefield side and a belt of mature trees on the northern side of the Site. The latter is not continuous, and currently does offer some filtered through-views, although there is no inter-visibility between the two locations at ground-level

- 7.4 The vertical scale of proposed dwelling units would potentially render them visible within southward views from the southern margins of the designated battlefield site, despite the presence of partly screening vegetation, and so it is proposed to recess the development footprint away from the northern road frontage of the Site, so that housing units would be more effectively concealed within inward views from the battlefield. In addition, it is proposed to further mitigate any possible visual impacts by planting additional screening trees along the northern edge of the Site. The creation of a corridor of green space between the proposed development and the designated battlefield site would create an additional degree of spatial and visual separation.
- 7.5 Any relationship between the Site and the designated battlefield is considerably limited by their contrasting landscape characters, with that of the Site a product of an early nineteenth-century Enclosure Act. The Site also has a very limited spatial relationship with the designated battlefield, which is effectively represented by a 60m section of its northern boundary, which faces the battlefield boundary across the intervening roadway of Enborne Street.
- 7.6 An assessment of any potential impacts to the settings of other heritage assets resulting from residential development within the Site has demonstrated that a small number of Grade II-listed buildings are located at considerable distances from it. Any inter-visibility between these buildings and the Site is obstructed by intervening land-forms and vegetation, so that the proposed development would have no effect on any other heritage settings.
- 7.7 An assessment of the archaeological potential of the Site has included limited data sets of recorded finds and investigations, within and surrounding an area of one-kilometre radius. The archaeological record has included antiquarian accounts of prehistoric lithic finds, together with the results of investigations conducted in the 1990s, during the construction of the A34 Newbury Bypass. On the basis of available data, it has been assessed that the Site has low potential for archaeological finds and features of all periods, with the possible exception of objects relating to the 1643 Battle, which have been recorded elsewhere in the locality. Historic mapping indicates that the Site remained part of an area of unenclosed common land or heathland for much of the historical period, and consequently does not appear to have attracted earlier activity or settlement. This conclusion is supported by the evidence of aerial and Lidar surveys, which have identified very few cropmark or earthwork features of archaeological origin within the area surrounding the Site. The results of archaeological

assessment are endorsed by a recent assessment for an area immediately to the south of the Site.

7.8 Due to the topographical context of the Site, and its limited spatial and visual relationship with the registered battlefield, it has been established that the proposed development would have no effect on the wider setting of the battlefield, or any other heritage assets. It is argued that the designated area of the battlefield does not represent its historic extent, and that its current boundaries are arbitrary. In addition, the setting and historic character of this designated area has been extensively impacted along its eastern side by modern housing development. On the basis of available data, the archaeological potential of the Site for all periods is assessed as low, although there may be some potential for random finds relating to the battle. Such finds would not relate to any below-ground or stratified remains.

7.9 The proposed residential development on this Site would result in a minimal level of harm to the designated battlefield site due to change in its wider setting. In this case, the magnitude of impact is assessed as minor, and the significance of impact as negligible. It is significant that a recent application for a solar farm development, to the north of Enborne Row and immediately to the south of the Site, has been consented (ref. 22/00101/FUL). The proposed development would therefore be consistent with the requirements of Policy CS19 of the West Berkshire Core Strategy Development Plan 2006-2026, and with the National Planning Policy Framework. Any harm to significance arising from setting impact in this case would be negligible, and would fall well within the lower range of less than substantial harm, as defined by NPPF and Planning Policy Guidance. Paragraph 202 of NPPF 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.

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**Transport Planning
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Land to the South of Enborne Street, Newbury

Hathor Property Ltd

Local Plan Review
Site and Access Appraisal

March 2023

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1.0 INTRODUCTION

1.1 Aim of Note

- 1.1.1 This Note has been prepared by Peter Evans Partnership (PEP) on behalf of Hathor Property Ltd, to provide an appraisal of the highway and transport matters associated with the potential residential development of land to south of Enborne Street, Newbury.
- 1.1.2 The site is being promoted through the West Berkshire Proposed Submissions (Regulation 19) Local Plan Review 2022-2039 and could be developed for some 60-70 dwellings.
- 1.1.3 This document sets out the accessibility of the site for active and sustainable travel modes, considers how the site would be accessed and indicates the likely level of vehicular trips that could be expected.
- 1.1.4 The site is bounded by Enborne Street to the north, woodland to the east and west and a field to the south. This is shown at Appendix 1. The site is undeveloped land of some 3.5 hectares.
- 1.1.5 The site is a 3.6km to the south west of Newbury town centre, 300m south west of the residential area of Wash Common, 500m north east of Enborne Row and 400m north of Wash Water.

2.0 TRANSPORT CONTEXT

2.1 Local Highway Network

2.1.1 Enborne Street is some 6m wide. To the north west it runs along the western side of the residential suburb of Wash Common and onwards towards Newbury. To the west the road continues towards small villages and settlements over the A34. It forms the major arms of a priority junction with Andover Drove some 200m west of the site.

2.1.2 Enborne Street is subject to the National speed limit, 60mph, and this changes to 30mph some 130m to the north east of the site just before the junction with The Grange.

2.2 Traffic Flows and Speeds

2.2.1 A one week traffic survey was undertaken on Enborne Street in February 2022. A summary of the weekday five day average traffic flows during the peak periods and across the day is set out below.

Time Period	Direction		
	Westbound	Eastbound	Two Way
08:00-09:00	59	89	148
17:00-18:00	39	37	76
Daily	528	510	1,038

2.2.2 Speed readings on Enborne Street indicate 85th percentile traffic speeds of some 39mph eastbound and 39mph westbound past the site.

2.3 Safety Record

2.3.1 A review of the road safety record in the vicinity of the site has been undertaken using the online database Crashmap for the most recent five year period. One collision has been recorded at the Enborne Street / Andover Drove junction and involved a car and a pedal cycle, resulting in a slight injury to the pedal cyclist.

2.4 Footways and Cycleways

2.4.1 A public footpath (ENBO/9/3) is to the west of the site, running on an approximate north east – south west alignment between Enborne Street and Andover Drove. It continues along a similar axis on the western side of Andover Drove to Enborne Row.

2.4.2 North east of the site there is a footway on the eastern side of Enborne Street, north of the junction with The Grange. There are sections of verge continuing along each side of Enborne Street past the site.

2.4.3 Enborne Street forms part of the Round Berkshire Cycle Route.

2.5 Public Transport

Bus Services

- 2.5.1 The nearest bus stop is on Meyrick Drive in Wash Common some 500m from the site.
- 2.5.2 Reading Buses under its Newbury & District brand run bus services 2, 2A, 2C, 6 and 8 between Newbury and Wash Common, with the most frequent services generally every 30 minutes during the morning and evening peak periods and hourly during the day Monday to Friday. The services are generally hourly on Saturday. Destinations served include Newbury railway station, Newbury town centre, Newbury College and Tesco Extra adjacent to Newbury Retail Park.
- 2.5.3 There are also less regular bus services between Wash Common and West Isley, East Isley, Compton, Hermitage and Chieveley, via Newbury town centre.

Rail Services

- 2.5.4 The nearest railway station is in Newbury, some 3.5km to the north west of the site. The station serves trains operated by Great Western Railway on the London Paddington to Taunton line. Trains to Reading and London typically operate every 20 minutes and to Taunton every two hours.

2.6 Local Facilities

- 2.6.1 Local facilities and amenities are summarised below and on the plan at Appendix 1.

Education

- 2.6.2 The nearest primary school to the site is Falkland Primary School in Wash Common, some 1.7km to the north east. The closest secondary school is Park House School in Wash Common, some 1.6km to the north east. Newbury College is 3.4km to the north east of the site.

Retail

- 2.6.3 A Sainsbury's petrol filling station with convenience stop is on the A343 in Wash Common, some 1.6km to the north east of the site.
- 2.6.4 A Co-Op convenience stop is at the A343 / Essex Street junction in Wash Common, some 1.8km to the north east of the site.
- 2.6.5 A Tesco Extra and Newbury Retail Park are at the A339 / Pinchington Lane junction in Sandford, some 3.6km north east of the site.

Leisure and Community

- 2.6.6 The Falkland Cricket Club and The Bowlers Arm public house are on Enborne Street, some 750m to the north of the site.
- 2.6.7 Wash Common Library and Community Centre are on Glendale Avenue, some 1km to the north east of the site. Wash Common Allotments and Wash Common Park are to the rear of the library and community centre.
- 2.6.8 A David Lloyd sports centre and Newbury Rugby Club are some 2.1km to the north east of the site on Monks Lane.

Employment

- 2.6.9 In addition to the education, retail and leisure facilities identified above, other places of employment near to the site include car dealerships adjacent to Tesco Extra on Pinchington Lane, and Greenham Business Park some 6km east of the site on the A339.
- 2.6.10 Further employment opportunities are provided in Newbury town centre and adjacent to Newbury Racecourse.

3.0 POTENTIAL DEVELOPMENT

3.1 Proposed Site Pedestrian and Vehicle Access

- 3.1.1 The site access is proposed off Enborne Street some 180m from the junction with The Grange and 250m from the junction with Andover Drive.
- 3.1.2 The access would be a priority junction with 10m radii and 6m wide access.
- 3.1.3 A 1.8m wide footway would be provided at the northern side of the junction and along the eastern side of Enborne Street to The Grange. This would connect the site to the existing footpath network.
- 3.1.4 A visibility splay of 2.4m x 120m to the left and to the right from the site access junction would be provided in accordance with the Design Manual for Roads and Bridges (DMRB) for 40mph vehicle speeds.
- 3.1.5 The existing right of way through the site could be improved and provide an improved route for pedestrians between Enborne Street and Andover Drive.
- 3.1.6 The proposed access arrangement is shown at Appendix 2.

3.2 Traffic Generation

- 3.2.1 The TRICS v7.9.4 independent national traffic survey database has been used to identify the likely level of traffic associated with the proposed development. The database was reviewed for sites with privately owned houses in similar areas within England and Wales.
- 3.2.2 On the basis of the TRICS database, the proposed residential development could generate the following trips:

Private Residential (70 Dwellings)	Arrivals		Departures		Two-way
	Rate per dwelling	Trips	Rate per dwelling	Trips	Trips
Morning Peak Hour (08:00-09:00)	0.072	9	0.282	25	34
Evening Peak Hour (17:00-18:00)	0.322	23	0.138	10	33

4.0 APPRAISAL

4.1 Accessibility

- 4.1.1 The site is on the edge of the Wash Common suburb of Newbury around 3.6km from Newbury town centre. It is within an acceptable walking distance of bus stops on Meyrick Drive, primary and secondary schools, convenience stores and local community and leisure facilities in Wash Common.
- 4.1.2 The site would be linked to the existing footway on Enborne Street and the wider footway network in Wash Common, by a new footway between the site access and The Grange.
- 4.1.3 The site is also within an acceptable cycling distance of Newbury town centre, the railway station, employment areas in Newbury and at Greenham Business Park, Newbury College and Tesco Extra. Enborne Street forms part of the Round Berkshire Cycle Route.
- 4.1.4 A number of bus services operate via the bus stops on Meyrick Drive some 500m north east of the site via Enborne Street. These buses provide direct and regular access to destinations including Newbury town centre, Newbury railway station, Tesco Extra, Newbury College and Newbury Retail Park. The buses could therefore serve commuters working in Newbury as well as educational, leisure and retail trips.
- 4.1.5 The site would therefore be accessible to day to day facilities by walking, cycling and public transport.

4.2 Access

- 4.2.1 A new 6m wide access road with a 10m radii bellmouth junction with Enborne Street would be provided to serve the residential development. This is an appropriate design and arrangement for residential accesses and for the traffic conditions on Enborne Street.
- 4.2.2 Visibility splays of 2.4m x 120m would be provided to each side of the access which is appropriate based on DMRB guidance for the measured 85th percentile traffic speeds on Enborne Street adjacent to the site.
- 4.2.3 A 1.8m wide footway is proposed along the north side of the new access and linked to the existing footway on Enborne Street at The Grange. The proposed footway is achievable within publicly maintainable highway and the site access works would be undertaken under a Section 278 agreement with West Berkshire Council.
- 4.2.4 Potential improvements to the right of way between Enborne Road and Andover Drove combined with the new footway on Enborne Street would improve the accessibility of the residential development at Washwater and Enborne Row.

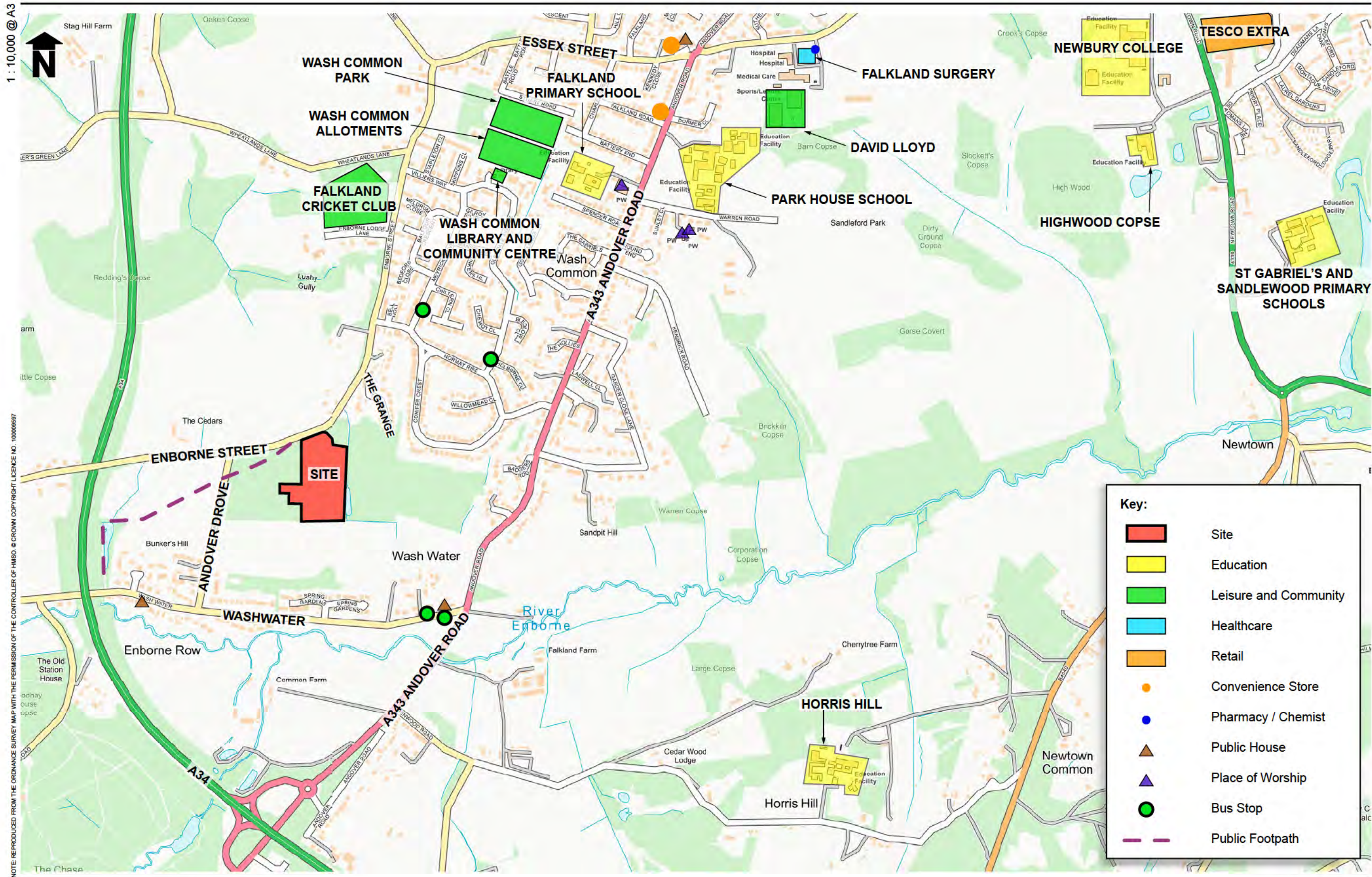
4.3 Traffic

- 4.3.1 A residential development of 70 dwellings in this location could generate some 34 and 33 two-way movements respectively in the morning and evening road network peak hours, which is around one vehicle movement every two minutes.
- 4.3.2 From a highways and transport perspective this low level of traffic generation is not material and would not affect existing traffic or safety conditions on Enborne Street which is lightly trafficked in any case as confirmed by the traffic surveys.
- 4.3.3 The traffic would distribute across the wider highway network and the impact on the wider network would not be severe as set out in NPPF.
- 4.3.4 The proposed development would add only a low level of traffic to the local road network and therefore would not materially affect road safety conditions.

5.0 CONCLUSIONS

5.1 Conclusions

- 5.1.1 The site would be accessible by non-car means of travel to the local area and to Newbury town centre. A footway to connect with the existing pedestrian links, facilities and bus stops in Wash Common would be provided as part of the proposals.
- 5.1.2 Potential improvements to the existing pedestrian right of way would improve the linkage between Washwater, Enborne Row and Enborne Street
- 5.1.3 A suitable site access with appropriate visibility splays be provided off Enborne Street to serve the development.
- 5.1.4 The likely level of traffic generated by the residential scheme of up to 70 dwellings would not materially affect capacity or safety conditions on the local highway network and not result in a severe impact in line with NPPF.
- 5.1.5 In light of the findings of this Site and Access Appraisal, we conclude that the use of this site for a residential development of up to 70 dwellings would be acceptable from a sustainable transport and highways perspective. As such there would be no severe or safety impact arising from the development.



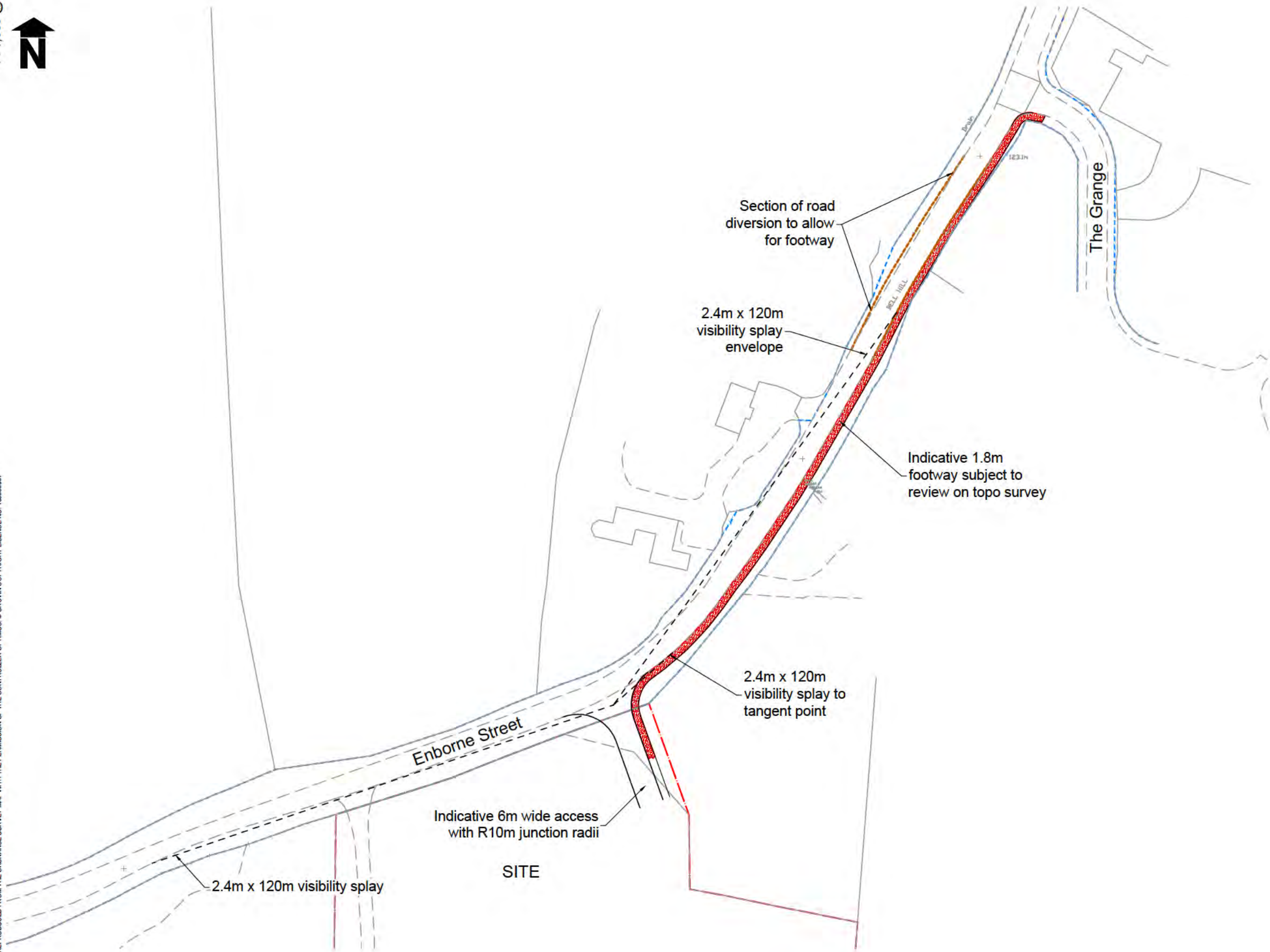
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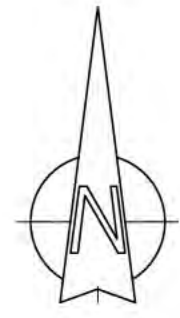


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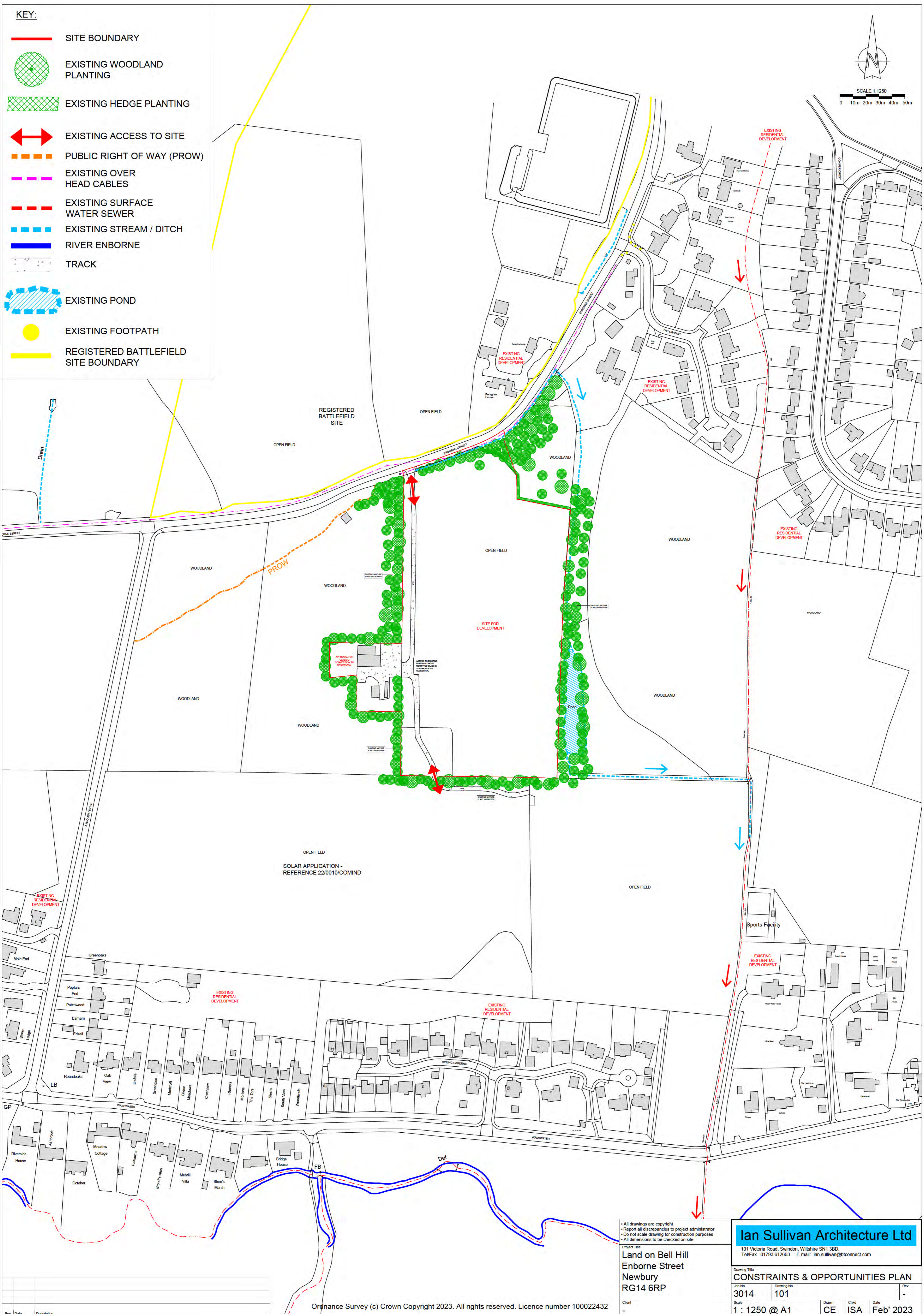


KEY:

-  SITE BOUNDARY
-  EXISTING WOODLAND PLANTING
-  EXISTING HEDGE PLANTING
-  EXISTING ACCESS TO SITE
-  PUBLIC RIGHT OF WAY (PROW)
-  EXISTING OVER HEAD CABLES
-  EXISTING SURFACE WATER SEWER
-  EXISTING STREAM / DITCH
-  RIVER ENBORNE
-  TRACK
-  EXISTING POND
-  EXISTING FOOTPATH
-  REGISTERED BATTLEFIELD SITE BOUNDARY



SCALE 1:1250
0 10m 20m 30m 40m 50m



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All dimensions to be checked on site

Project Title
Land on Bell Hill
Enborne Street
Newbury
RG14 6RP

Ian Sullivan Architecture Ltd
101 Victoria Road, Swindon, Wiltshire SN1 3BD.
Tel/Fax 01793 612663 - E-mail - ian.sullivan@btconnect.com

Drawing Title
CONSTRAINTS & OPPORTUNITIES PLAN
Job No 3014 Drawing No 101

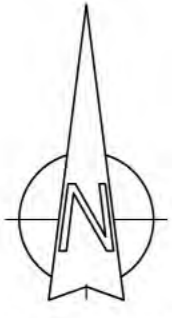
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Rev	Date	Description

KEY:

- SITE BOUNDARY
- EXISTING WOODLAND PLANTING
- PUBLIC RIGHT OF WAY (PROW)
- PUBLIC OPEN SPACE (POS)
- 3M PLANTING BUFFER
- 5M PLANTING BUFFER
- EXISTING FOOTPATH
- FOOTPATH CONNECTION
- EXISTING STREAM / DITCH
- BUILDING OUTLINE
- KEY BUILDING OUTLINE
- THE STREET
- SECONDARY ROAD
- PLOT BOUNDARY DIVISION

SITE AREA - 32235 M²



SCALE 1:1000
0 10m 20m 30m 40m 50m



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**Land on Bell Hill
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Drawing Title
MASTER PLAN

Job No
3014

Drawing No
500

Client
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Scale
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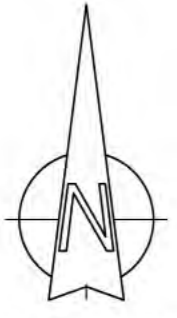
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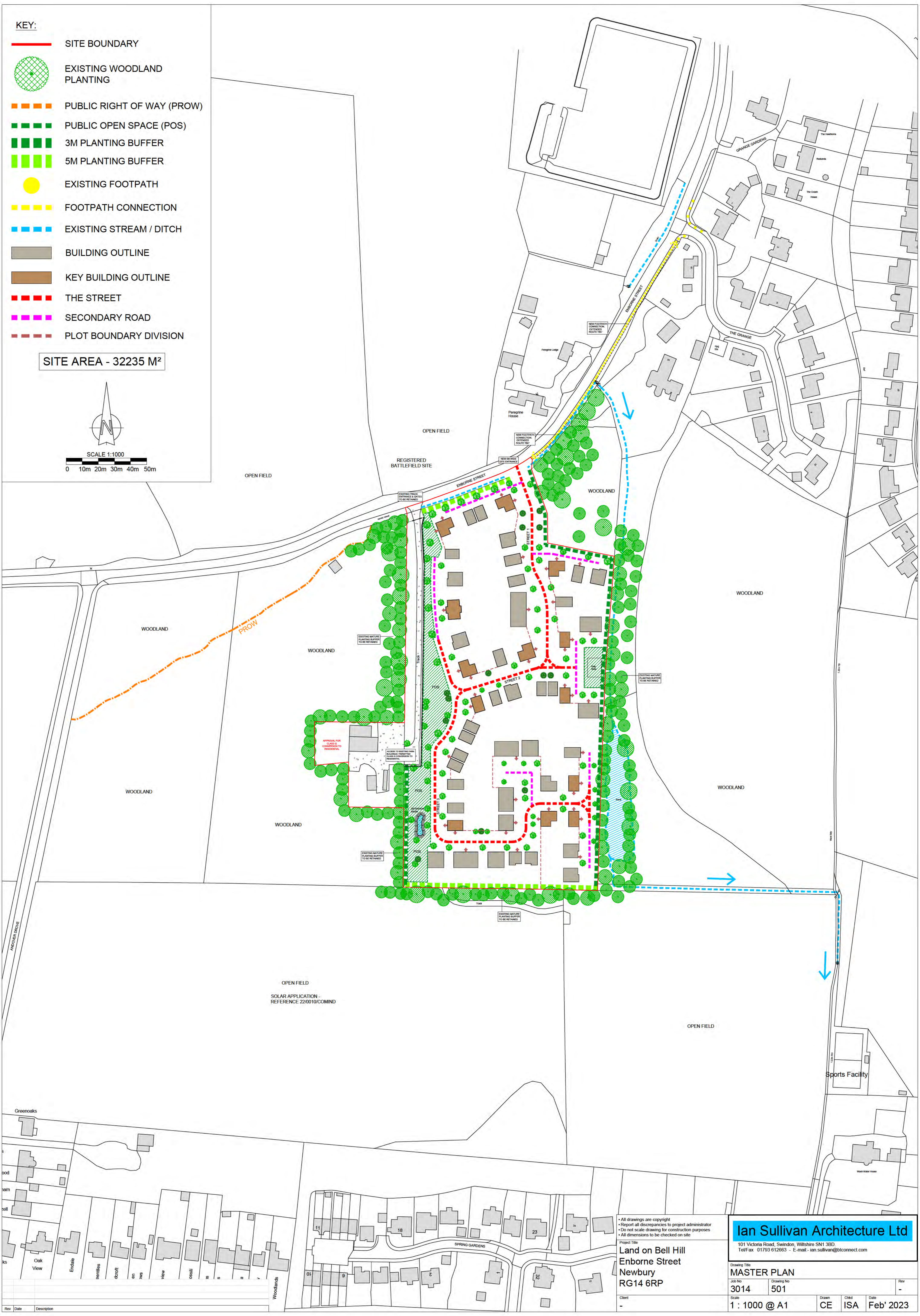
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- - - PLOT BOUNDARY DIVISION

SITE AREA - 32235 M²



SCALE 1:1000
0 10m 20m 30m 40m 50m



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**Land on Bell Hill
Enborne Street
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Client
-

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Drawing Title		MASTER PLAN	
Job No	3014	Drawing No	501
Scale	1 : 1000 @ A1	Drawn	CE
		Chkd	ISA
		Date	Feb' 2023

Rev	Date	Description