

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Susan Shakespeare (1333621)
Comment ID	PS364
Response Date	02/03/23 21:20
Consultation Point	Appendix 2 Settlement Boundary Review (View)
Status	Processed
Submission Type	Web
Version	0.9
Bookmark	Shakespeare, Susan

1. Do you consider the Local Plan Review is legally compliant?

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

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

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. . Yes

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

I do not believe the settlement boundary, as currently defined around Cold Ash - specifically at Alley Gully, Bucklebury Alley, is consistent with the criteria set out in the consultation draft Local Plan and national policy in terms of delivering sustainable development. The current alignment of the Cold Ash settlement boundary at Alley Gully, Bucklebury Alley, should be revised in accordance with the settlement boundary criteria specified by the Council.

The current alignment of the boundary is arbitrary and ill-defined; cutting through an area of woodland, identified by DeFRA as priority habitat (circled in black on the extract from Defra Magic Map) and does not follow any defined features, leaving its precise position open to misinterpretation on the ground. The area in question is identified on an extract from the local plan shown by red hatching (see attachment).

The Council suggests settlement boundaries have been defined based on landscape analysis, contained within a variety of reports, including:

“Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire: FINAL PHASE 2 REPORT: COLD ASH”

This report sets out the key landscape characteristics of Cold Ash, which include, inter alia:

“- variable land cover forming an intricate mosaic of woodland, pasture and small areas of remnant heathland.....

- . large, interconnected woodland blocks and strong hedgerow pattern with mature trees restrict views and create an enclosed and intimate character;
- . low wooded horizons are a feature;
- . numerous semi-natural woodlands of ancient origin;
- . many features of biodiversity interest including heathland, dry and wet woodland, bog and areas of wet meadow;
- . intricate network of rural lanes, many sunken and overhung by woodland plus more intrusive road infrastructure.....” The report specifically states:

“- historic parkland based on medieval deer parks and manor houses with associated ornamental parklands with gardens, rides and plantings are a particular feature;

- . flat to undulating plateau, generously scaled rolling landscape with some pronounced wooded ridges (VDS);
- . a complex pattern of landscape, dominated by woodland; coniferous, or mixed with beech and birch (VDS)
- . pastures; remnant heathlands and commons (VDS);
- . heathland and woodland habitats - deciduous and mixed woodland to pasture and arable (VDS);
- . the area abounds with natural drains, issues and sinks, all of which help to ensure natural drainage and control the run-off of excessive rainfall. These are particularly evident in the local gaps between Cold Ash and the neighbouring parishes (VDS);
- . woodland is a dominant natural feature in this area with a typical landscape of pine and birch...;
- . the older parts of the villages are more wooded and have larger and more mature species than the newer parts (VDS);
- . in the future, the lack of large trees could have an adverse effect on the village as a whole if sufficient open space is not provided in new developments to allow for planting larger trees (VDS).”

Reference is made to the importance of woodland and natural habitats throughout the report.

This same theme is continued throughout the Cold Ash and Ashmore Green Village Design Statement, adopted as SPG, by West Berkshire Council.

The Design Statement advises, particular landscape features include: “..... heathland and woodland habitats.....”

“.....deciduous and mixed woodland to pasture and arable linear settlements within wooded areas;”

Bucklebury Alley is specifically mentioned:

“Areas such as Fishers Lane, Bucklebury Alley and the lower part of Ashmore Green Road have retained much of their original look, having grass verges, large trees and hedges and no pavements. Any houses are set well back. Otherwise, the lanes are flanked by fields or woods.”

Moreover, the report advises:

“The oldest part of the settlement appears to be the houses and cottages at Bucklebury Alley, which even today gives the impression of being a forest clearing settlement.”

Under Policy ENT. 1 Guidelines for Environment, Landscape; specific reference is made to conserving:

“...the diversity and mix of landscape character types in the parish, eg the wooded setting of Cold Ash”.

The Council states that:

“...settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside....”

The wording “settlement boundaries protect the character of a settlement” is particularly relevant on this occasion. In this instance, the wider “settlement” is Cold Ash, but more specifically in terms of this representation the “settlement” is Bucklebury Alley, which displays its own unique landscape characteristics within the overall context of Cold Ash, as detailed above.

The red hatched area shown on the plan, contributes to the wooded vernacular, of Bucklebury Alley, fronted by mature, if not “vintage” oak trees, set atop a hedge bank along Bucklebury Alley. The site comprises mature ash trees, some of which have already been felled without licence by the landowner, as well as young Beech, Hazel and Holly trees. The area sits within the North Wessex Downs AONB. The site also allows for long views towards Westrop Woods, a key feature of the landscape setting of Bucklebury Alley.

The Council advises:

“Where practicable and barring the exceptions set out below, boundaries will usually follow clearly defined features such as walls, hedgerows, railway lines and roads.

Where possible, preference will be given to using features that are likely to have a degree of permanence as some features can change over time.”

This is crucially relevant to the site in question, an area of woodland, with the settlement boundary running through it, which does not follow any clearly defined feature and is, therefore, very much, open to interpretation.

The proposed alteration to the settlement boundary at this point would result in the alignment being clearly and permanently defined by the fence line of the north east boundary to Pine Lodge, by Bucklebury Alley itself along the northern boundary, and the fence line of the garden surrounding Eddystone House (also known as Chy an Drea) along the north west side, illustrated by the red line on the attached extract from the local plan.

The Council suggests:

“single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints...”

are suitable for inclusion within settlement boundaries.

However, the critical wording is “physically, functionally and visually related to the existing built up area” and even more importantly “taking account of any environmental development constraints”

The area of land in question falls foul of these specific criteria.

Physically, the site is a small, misshaped, sloping, narrow, sight located on a sharp bend along the Alley with significantly impaired sight lines to east and west, in direct contrast to existing properties.

Functionally, the site provides an area of green infrastructure, especially, essential habitat for protected and non protected species, including bats, as well as an unrestricted stepping stone for roaming mammals such as Muntjacs and a linear habitat in terms of its hedgerow. Its function does not, therefore, accord with the existing built development along the Alley.

Visually, as discussed above, the site plays an essential role in the natural, wooded landscape setting of the Alley,

The Council advises areas to exclude from settlement boundaries, include, inter alia:

“Tree belts, woodland areas, watercourses and other features which help to soften, [and] screen existing development...”

I advocate, this particular area accords with this criteria comprising elements of woodland, hedgerow and an overall area of green infrastructure which contributes to the unique wooded and natural landscape of Bucklebury Alley and should, therefore, fall outside the settlement boundary for Cold Ash.

The proposed re alignment of the Cold Ash settlement boundary at this point - Alley Gully - Bucklebury Alley will be marked by clearly defined, permanent features.

(see attachment)

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

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

Yes

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 Local Plan Review 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 attachment

5. Independent Examination

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

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

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

I would like to participate in the oral part of the examination in order to expand on my reasons given for the realignment of the Cold Ash settlement boundary.

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

The submission of the Local Plan Review for Independent Examination

. Yes

The publication of the report of the Inspector appointed to carry out the examination

. Yes

The adoption of the Local Plan Review

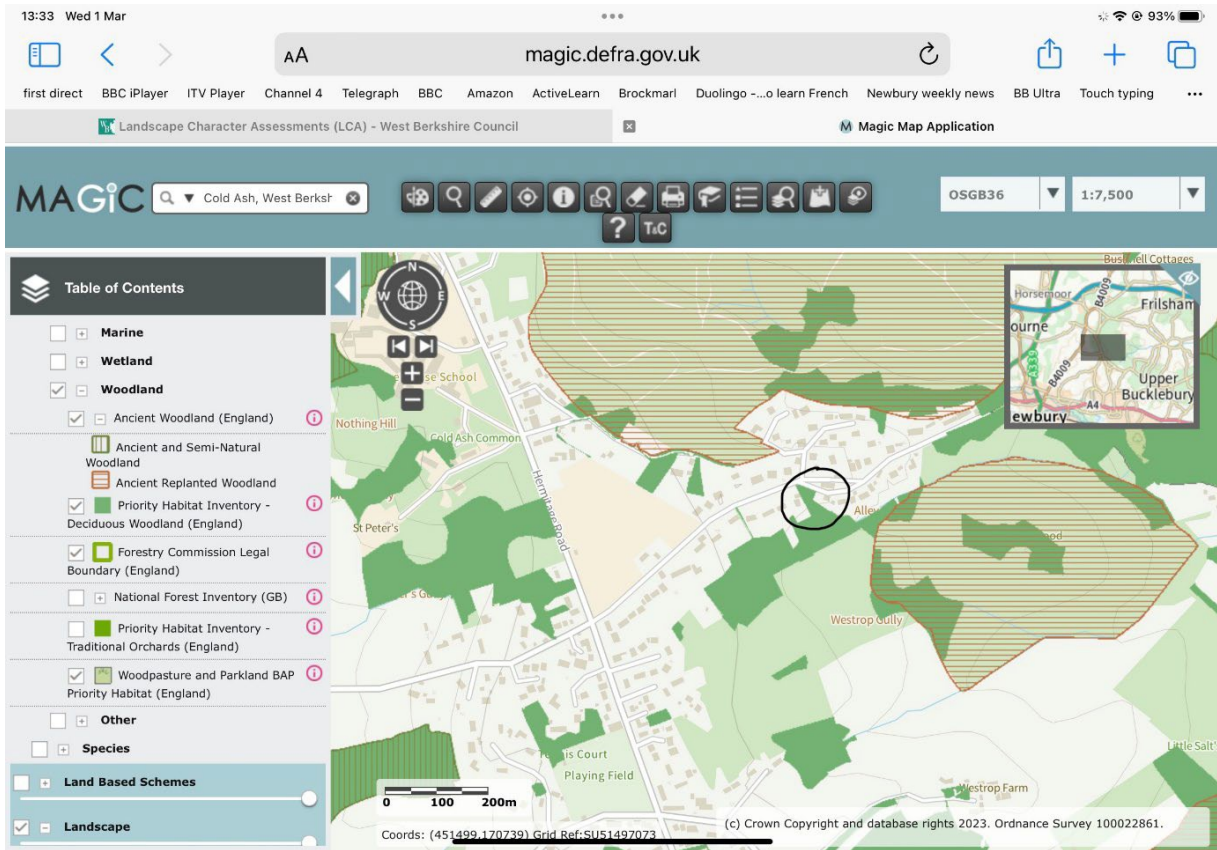
. Yes

Attached file 1

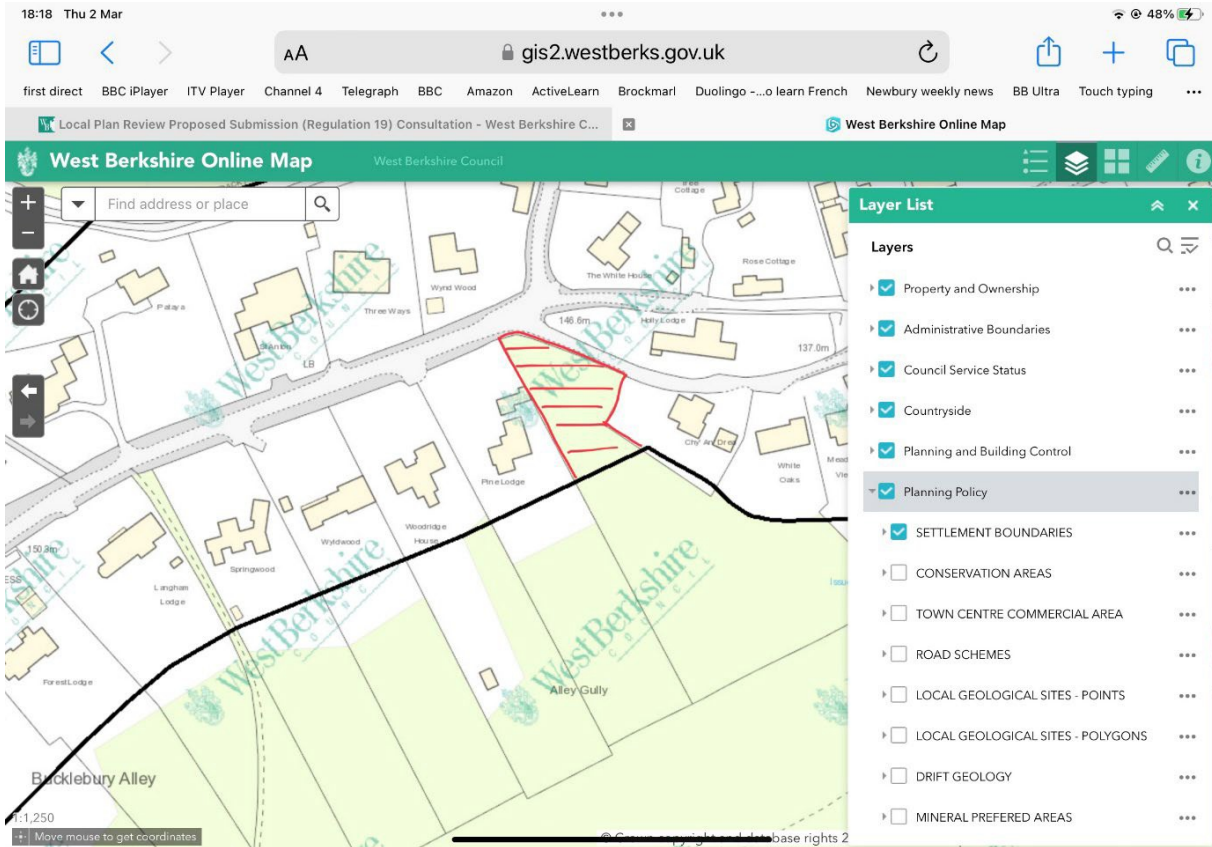
Susan Shakespeare attachment REDACTED.pdf

Proposed Amendment to the Alignment of Cold Ash Settlement Boundary

The current alignment of the boundary is arbitrary and ill-defined; cutting through an area of woodland, identified by DeFRA as priority habitat (circled in black on the extract from Defra Magic Map) and does not follow any defined features, leaving its precise position open to misinterpretation on the ground.



The area in question is identified on an extract from the local plan shown by red hatching (see below).



The proposed alteration to the settlement boundary at this point would result in the alignment being clearly and permanently defined by the fence line of the north east boundary to Pine Lodge, by Bucklebury Alley itself along the northern boundary, and the fence line of the garden surrounding Eddystone House (also known as Chy an Drea) along the north west side, illustrated by the red line on the following extract from the local plan.

