

**Summary of representations received by West Berkshire District Council on the Hermitage Neighbourhood Development Plan (NDP)  
as part of the Regulation 16 consultation**

**Consultation dates:** 21 July 2023 – 1 September 2023

Respondent	Policy / paragraph	Summary of comment
Canal and River Trust	General	Canal and River Trust have no waterways, assets or land interests within the Neighbourhood Area and therefore have no comment to make.
Historic England	General	<p>Welcome the NDP and are pleased to see that the historic environment of the Parish features throughout. Although the Neighbourhood Area does contain a number of designated heritage assets, at this point Historic England do not consider a need to be involved in the detailed development of the strategy for your area. However, advice and guidance is provided which may be of assistance:</p> <ul style="list-style-type: none"> <li>• Plans should set out a positive strategy for the conservation and enjoyment of the historic environment in line with paragraph 190 of the National Planning Policy Framework (NPPF). It is important that as a minimum, the strategy for the area safeguards those elements of the Neighbourhood Area that contribute the significance of these assets.</li> <li>• Planning Practice Guidance is clear that, where relevant, NDPs need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. The NDP is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that are not recognised at a national level through listing or scheduling. Historic England have produced an advice note on Local Listings.</li> <li>• NDP could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. Historic England have published advice on how to write effective NDP policies.</li> <li>• Speak to staff at the local authority archaeological advisory service who can provide details of designated heritage assets and non-designated locally important buildings, archaeological remains, and landscape. Involvement of local voluntary groups may be useful.</li> <li>• The local authority may be able to provide general support in the preparation of the NDP. There are also funding opportunities available from Locality that could enable the community to hire appropriate expertise.</li> <li>• The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved and enhanced. Historic England have produced an advice note on conservation area designation, appraisal, and management.</li> <li>• NPPF places emphasis on the importance of good design. NDPs policies should therefore ensure that developments in the area establish a strong sense of place, and respond to local character and history by reflecting the local identity of the place – for instance through the use of appropriate materials, and attractive design.</li> <li>• The NDP is an opportunity for the community to designate Local Green Spaces. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with</li> </ul>

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		<p>existing green spaces or access to them or aimed at managing development around them. Locality has guidance on this.</p> <ul style="list-style-type: none"> <li>• The NDP process could be used to identify any potential Assets of Community Value. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved.</li> <li>• Communities with an adopted NDP are entitled to claim 25% of the Community Infrastructure Levy (CIL). Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the NDP.</li> <li>• If concerned about the impact of high traffic levels through the area, the 'Traffic in Villages' toolkit developed by Hamilton- Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource.</li> </ul>
Ian Develin	6.2.2, 9.2 and Table 9.1	<p>Already clear what the existing use of the green space at Lipscomb Close is, and it has been used for this purpose for many years.</p> <p>Objection to the proposal for the green space in Lipscomb Close to have play equipment located on it. It will turn into a non-peaceful place for residents who live in close proximity, and this will impact upon quality of life.</p> <p>The intention to place play equipment on the green space is in contradiction to 6.22 and what the residents want the space to be used for. There are many wildlife species in the trees, which are also protected. Play equipment would have an adverse impact on the flora and fauna.</p> <p>Lipscomb Close is not suitable to park cars on as the road is curved and narrow.</p> <p>There are other more adequate play areas in the village – a play area is under development as part of the residential development (planning application ref: 20/00912/FULEXT) of land at Charlotte Close. The Section 106 agreement for this development states there is play area for children. There is a pedestrian walkway from Lipscombe Close to the Charlotte Close play area which is approximately 70 metres from the Lipscomb Close green space.</p> <p>There should be a balance and diversity of quiet and reflective spaces, and play spaces should not dominate.</p>
National Highways	General	Following a review of the consultation documents, National Highways have no comments to make.
Sport England	General	<p>No specific comments made on the NDP. General advice provided in respect of :</p> <ul style="list-style-type: none"> <li>• compliance with paragraphs 98 and 99 of the NPPF;</li> <li>• compliance with the health and well-being section of Planning Practice Guidance</li> <li>• evidence base and assessing needs;</li> </ul>

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		<ul style="list-style-type: none"> <li>• demand for sport as a result of new development;</li> <li>• Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land; and</li> <li>• design.</li> </ul>
Thames Water	General	<p>A key sustainability objective for the preparation of Local Plans and NDPs should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure.</p> <p>The Planning Practice Guidance (PPG) and the NPPF have regard to the provision of infrastructure:</p> <ul style="list-style-type: none"> <li>• Paragraph 11: Plans should apply a presumption in favour of sustainable development that aligns growth and infrastructure.</li> <li>• Paragraph 20: plans should promote a sustainable pattern of development that should make sufficient provision to water supply and wastewater.</li> <li>• Paragraph 26: effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary.</li> <li>• Paragraph 28: non-strategic policies can include allocations for the provision of infrastructure.</li> <li>• PPG: Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs.</li> </ul> <p>The NDP should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).</p> <p>It is recommended that the NDP include the following text:</p> <p><u>Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</u></p> <p><u>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will,</u></p>

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		<p><u>where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u></p>
	HER4	<p>PPG requires a sequential approach by local planning authorities in areas to be known to be at risk flooding, including flooding from sewars. Flood risk sustainability objectives and policies should also make reference to ‘sewer flooding’ and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to Sustainable Drainage Systems (SUDS) that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SUDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request the following paragraph is added into the NDP:</p> <p><u>It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.</u></p>
	General	<p>The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.</p> <p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day as set out in the PPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.</p> <p>Understanding of Thames Water that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that</p>

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		<p>such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.</p> <p>Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from their smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.</p> <p>Proposed policy text recommended for inclusion:</p> <p><u>Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the 'Fittings Approach' in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</u></p>
	General	<p>There are no new allocations in the NDP and the level of information does not enable Thames Water to make an assessment of the impact the proposed development will have on the waste water/sewerage network infrastructure and sewage treatment works. To enable us to provide more specific comments we require details of the type and scale of development together with the anticipated phasing.</p> <p>Paragraph 1.35 of the NDP states: "<i>When submitting the Nutrient calculator you will also need to provide evidence that you have received permission for connection or have applied for connection to Thames Water systems and which precise wastewater treatment works you have applied to connect to. It is recommend that developers contact Thames Water to discuss their development proposals by using their pre app service.</i>"</p> <p>Thames Water recommends that developers contact them to discuss their development proposals by their pre app service and therefore support the second sentence of paragraph 1.35 in this respect.</p> <p>In the event of an upgrade to Thames Water sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to their sewer network under the Water Industry Act they may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.</p>
The Downland Practice	General	The Practice do not object to any housing developments in the Cold Ash/Hermitage area, the increase in patient numbers will have a direct effect on services from the Downland Practice. This will be mainly GP appointments and

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		Nursing care but also the provision of pharmacies services. The Downland Practice will be interested in accessing any S106 and Community Infrastructure Levy contribution for health services to meet the increased demand associated with the aggregate impact of housing developments in Cold Ash/Hermitage area.
Transport for London	General	No comments

Representations will be available to view in full on West Berkshire District Council's website: <https://www.westberks.gov.uk/hermitagenp> and on the Council's Planning Policy Consultation Portal: <https://consult.westberks.gov.uk/kse/>.