

NDP - Possible ways forward following the landscape study

Summary

The NDP Examiner recommended that the NDP should not progress to referendum because insufficient work had been done to ascertain the impact of the site allocation proposal on the landscape. In response a landscape study has been carried out for a number of sites in addition to the one allocated in the NDP; this study is in Appendix 1.

The Steering Group has studied the new evidence in the landscape study and assessed it together with all the other sustainability evidence collected during the whole NDP process. They have found that when all of the sustainability criteria are taken together, as recommended as good practice, the provision of up to 110 homes on MOR006 is still considered the most sustainable option.

Notwithstanding the above there are several ways forward:

Option 1 Recommend to WBC that the original plan go forward to referendum (with the phrase “up to 110” in place of “110” as well as the examiner’s other minor modifications)

Option 2 Abandon the NDP and rely on WBC for future planning

Option 3 Revise the NDP (including new consultation and examination) to give the full 110 homes on one or more site(s)

None of these options are without issues; the pros and cons are reviewed below.

Resolution

Members are asked to resolve to determine which of the options should be recommended to WBC. **The Steering Group’s recommendation is Option 1.**

Discussion

The NDP’s present position

The examiner recommended that the NDP not go forward to a referendum due to his perception that insufficient regard had been paid to landscape assessment. The examiner also recommended various relatively minor modifications to the text of the NDP notwithstanding his major recommendation. Those minor modifications have been agreed by SMPC at its January meeting. WBC is able to decide to go forward to referendum if new evidence is available with respect to the major recommendation.

To that end SMPC, through District Councillor Bridgeman has arranged for WBC to commission a landscape study to address the concerns raised by the examiner with regard to a lack of landscape information. That study is now available for SMPC to use to determine its recommendation to WBC as to how to deal with the NDP. The recommendation has to go to WBC by the 13th of February to allow officers to consider it and make a recommendation on how to proceed.

If that recommendation is to go forward to a referendum (Options 1) it is subject to a six-week consultation period for all those who made representations at the regulation 16 (post submission) and regulation 14 (pre-submission) consultation. All those who have previously been contacted will be contacted again by WBC. Finally if there are no particular problems with the consultation, the recommendation would be taken to a WBC Council meeting on the 9th of May (It should be noted that this is after the agreed date of the end of April and would need SMPC make a request for a further extension).

If a recommendation to hold a referendum was agreed by WBC members, the referendum would be held during the summer. Of course if SMPC's recommendation is not to take forward the NDP (Options 2 or 3), none of this would apply.

Summary of the [Landscape Study](#)

Landscapes are categorised as having a Landscape Character Type (LCT). Parts of the village are in LCT13 (Gravel Plateau Woodlands with Pasture and Heaths) and parts in LCT14 (Plateau Edge Transitional Matrix). As a generalisation, LCT14 is perceived to be a more valued class of landscape. Most, but not all, of the current village settlement envelope is in LCT13.

The northern part of MOR006 (The Site allocated in the NDP) is in LCT13 and the southern part in LCT 14. The study has indicated that only the part of MOR006 above the 90m contour line is suitable for development from the point of view of landscape sustainability. This equates approximately to the part in LCT13.

The study (See Appendix 1) also considered other sites: Spring Lane (MOR008) and Kiln Lane (MOR001) were assessed as unsuitable from the point of view of landscape sustainability. West End Rd (MOR005) and a new site (MOR009 an amalgam of 4 houses on Brewery Common) were assessed as potentially suitable. These are the sites in the WBC's SHLAA minus those they dismissed straight away plus MOR009. It should be noted that MOR009 was not included in any part of the NDP consultation or examination and has been introduced to meet the requirement to take on board any new evidence. It will be recalled that this area was put forward as a possible extension to the village envelope at the consultation stage but was rejected. The study is to be found in full as Appendix 1 but the main findings are summarised in Table 1 below.

Table 1 [The Landscape Study](#) - Summary of the Main Findings for each site.

	MOR001 Kiln Lane (whole site – 2 fields)	MOR005 West End Rd	MOR006 The Site	MOR008 Spring Lane	MOR009 4 gardens on Brewery Common
Historic Landscape sensitivity	High 18 C irregular fields	Medium – high Parliamentary enclosure	Low Amalgamated fields	Medium – high Part historic settlement	Low Recent modern growth
Relationship with settlement	Only NW corner of North field above 90m Housing on 1 side separated by long gardens and tree belts	Above 90m Adjacent and opposite to housing/amenities on 3 sides	Partially above 90m Adjacent to housing on 3 sides	Partially above 90m Adjacent to settlement on 2 sides Existing woodland would screen	Above 90m Transition area from dense building to countryside
Relationship with countryside	Totally outside plateau. Typical plateau and undulating topography Southern parcel contiguous with wider landscape	On plateau Typical field for west of village	Partially on the plateau Typical plateau and undulating topography	On plateau Undulating land falling to stream Valued features	On plateau Woodland blocks to N and E Valued trees and hedgerows
Loss of landscape features if built on	Pasture Distinctive Mortimer landscape setting Rural character of Kiln Lane (valued feature) Loss of context for central footpath and wooded triangle	Hedges would become urbanised Rural approach to Mortimer	Arable land contributing to wider landscape Urbanisation of edges – woodland on W and footpath on E	Open pasture Urbanisation of adjoining woodland , pasture and hedgerow features	Mature trees and hedgerows Large semi-rural, open gardens
Loss to views if built on	Views from two public footpaths Open views to south Views from south	None	Views to wider countryside from footpath Views from south, Drury Lane etc Loss of view to wooded ridge line	Localised	Possible impact on views from centre of and approaches to village Possible loss of prominent tree cover

Impact on the character of Mortimer	Only NW corner is above 90m. Development below 90m would be out of keeping with settlement character. Scale of development would not be compatible with guidance for this area	None	Housing on the whole site would: Urbanise the settlement edge Expand beyond plateau Scale would be out of keeping with settlement pattern	Development would not be out of character for the area.	Suburbanisation of Brewery Common
Recommendation	None of this site is suitable for development	Considered a potential housing site subject to landscape conditions.	Can build above 90m line and put in significant landscaping to mitigate view loss. This would not be out of keeping with existing settlement	Not suitable as the landscape assets are to be conserved under Berkshire landscape Character assessment (BLCA) and the Newbury District Landscape Character Assessment (NDLCA) guidance	Possibly if small scale development only, all mature tree and hedgerows retained lower density housing than in normal developments

In the above table there is reference to areas being above or below 90m. This refers to the 90m contour and has been taken, by the study, as a proxy for the boundary of the plateau on which most of the village sits.

It can be seen from the above that MOR001 and MOR008 are unacceptable on landscape grounds. As will be seen from further on in this report (See Appendix 3) these sites do not feature well in accessibility terms. As such it is not considered that any evidence exists to warrant their further consideration. Because of the nature of MOR009 it is also considered that this would not be appropriate or indeed contribute meaningfully to the required HSADPD. Thus a way forward effectively has to be found which involves either or both MOR005 and MOR006.

Sustainability

Landscape sustainability (the issue raised by the examiner) is only one factor of several that must be taken into account when assessing the suitability of a particular site. The National Planning Policy Framework (NPPF) requires that the three sustainability roles (social, economic and environmental) should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

The NPPF states:-

Social Role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

NPPF 37 further states *Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.*

Economic Role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure

Environmental Role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy

All these sustainability factors must be taken into account when assessing which allocation solution is the most beneficial to a community not forgetting the vision and principles supported by the Mortimer community and site design

The Options

Set out below are the three options outlined in the summary. Each option is described and the particular issues associated with that option are discussed. A conclusion on whether to recommend that option is then put forward. A summary of the differences between the Options is to be found in Appendix 2.

Option 1 is dealt with at greater length than the other options as it requires an analysis of the relevance of the landscape study findings within the context of the overall sustainability of the plan.

Option 1

Following the assessment of the landscape study the Stratfield Mortimer NDP has been reconsidered to determine if it should still go forward to referendum with the modifications already agreed by SMPC. It is felt that it should go forward and the reasoning for that conclusion is set out below.

Fundamental issues

- The NDP originally stated that, in conformity with WBC's Housing Sites Allocation Development Plan Document (HSADPD), 110 homes should be provided on MOR006. This can be changed, in accordance with the recommendation of the Examiner, to read up to 110 homes.
- The Examiner in para 72 of his report notes that the developer of MOR006 states '*in principle a development of about 60 units would be viable even with the provision of affordable housing and land set aside for the school and surgery*'.
- The economical use of land is an important issue.
- The landscape study makes it clear that the landscape integrity of the village is an important consideration for the NDP.
- The NPPF also makes it clear that the three elements of sustainability, social, economic and environmental should not be considered in isolation but considered as a whole as they are mutually dependent.
- Questionnaire returns identified that the majority of respondents wished to locate new developments close to the centre of the village and to minimise the extension of the development boundary

Analysis

The recommendation from the landscape study, as far as it affected the capacity of MOR006, was that development should be confined to land above the 90m AOD. This would have the effect of reducing the number of homes on MOR006 from the 110 previously envisaged. This would not then be in general conformity with the WBC HSADPD. If the DPD target figure is to be met this would mean either the recommendations from the landscape study should not be fully implemented or another site(s) would have to be found. If another site was required the NDP, as it stands, cannot proceed to referendum. As such the question then becomes can not fully implementing the recommendations of the landscape study be justified?

It is considered that there are reasons why the recommendations should not be fully applied. These are:-

- MOR006 represents by far and away the best accessibility to the social amenities of the village of any of the sites considered by the landscape assessment. This is clear from the table in Appendix 3. It should also be noted that a particular theme of the NDP was the provision of starter homes and downsizing homes. The residents of both these types of homes and any with mobility impairment will, it is believed, particularly require/benefit from the

shortest possible walking distances to village amenities and bus routes. Thus this site best satisfies the social role for sustainability

- The NPPF also makes clear that the allocation of sites should favour those that promote wellbeing and the only site which offers the provision of a large amount of additional open space is MOR006. Indeed it offers at least 3ha of open green space and a public footpath leading directly to the open countryside and is a short distance from the fairground with its social amenities.
- MOR006 also offers the opportunity for the construction of a new school and doctor's surgery. The provision of such facilities fully adjacent to new development is quite clearly a great benefit to the community. This would not be the case if more than one site was to make up the required housing numbers, even if the land was made available.
- MOR006 with approaching 110 homes does make economical use of land. If the housing requirement was to be made up using more sites then this would not be so likely to be the case. Indeed the use now of other additional sites would constrain the possibilities for any acceptable future development of the village.
- The thrust of the landscape study is accepted. Indeed the Vision for the NDP states "The rural character and setting of the parish will remain with the minimum of intrusion on the existing surrounding green and agricultural space." However, the exact boundary between development and open countryside, especially when that boundary is softened by extensive landscaping, seems to be open to some flexibility. So to insist on no development below a rigid 90m contour line on MOR006 which might, as a corollary, mean extending the village envelope significantly in another part of the village, seems at odds with the general thrust of planning policy. This would of course be different if the landscape was of particular high value such as an AONB but it is not. As such it is felt that a slight relaxation of the landscape recommendations would make sense in overall environmental terms.

From the above it can be seen that a case can be made for not fully applying the recommendations from the landscape study. Indeed it is felt that a very positive advantage will accrue in overall sustainability if the recommendations are slightly relaxed. Exactly how far the recommendations should be relaxed is not possible to determine without further work on the design of MOR006. For instance it would certainly seem feasible to more nearly achieve 110 homes on MOR006 without going greatly below the 90m contour. Hence, with the words in the NDP of up to 110 homes the lack of precise detail should not be a hurdle that stops the NDP going to referendum.

Option 1 Conclusion

There are good reasons to slightly relax the recommendations from the landscape assessment so as to allow the WBC HSADPD housing numbers for Mortimer to be satisfied by development of MOR006 alone. As such this option is recommended.

Option 2

This is to abandon the NDP and simply rely on WBC for future planning of the parish.

Abandoning the NDP would mean:

- The allocation of housing reverts to WBC. If WBC were to allocate a site/sites in Mortimer they would start again from scratch, no decisions having been made as to which sites would be allocated. WBC would need to look at all potential sites and the evidence available at the time, rather than necessarily going back to options previously considered.
- Although there might still be the provision of land for school and surgery, there would be less guarantee of this and there would be no policy in place to control what happened to any land initially so allocated
- The community's views would not be taken into account in any way beyond normal planning application procedures
- The NDP policies which apply to all future developments would all be lost. These include additional control over building and development design and style, (including additional flood prevention measures), the requirement for developments to involve the community in site development briefs and the provision of an integrated water supply and drainage strategy before development.
- The NDP policies which protect the nature of village would all be lost. These include those that give power to the expressed wish of the electorate to respect the semi-rural nature of the centre of the village and the rural nature of the surrounding open countryside, eg. the designation of The Fairground, APMF, Foudry Brook area, and Windmill Common as Local Green Spaces, wildlife habitat in new developments and their boundaries, and policies supporting the enhancement of the commercial centre of the village.
- SMPC would not receive the enhanced CIL payment for any development.

It can be seen from the above that there are a great number of reasons why the NDP should not simply be abandoned.

Option 2 Conclusion

Because of the loss of all the non-site allocation policies of the NDP this option is not recommended.

Option 3

This is to revise the NDP, involving new consultation and public examination based on the information in the landscape study on the possibility of development sites.

This option has several sub options and some consequences that are common to all the options. The consequences are:-

- There would be a delay of up to two years while the re-consultations were carried out. During this time the parish would be open to developers putting in applications on the ground that the HSDPD was not being adhered to.
- A good deal of effort and cost would have to be expended by SMPC to organise and run the consultations
- It would be difficult to explain this turn of events to the community

The sub options that would need to be considered concern the form of consultation. For instance the original consultation could be re-run with the addition of the information about the landscape assessment. Alternatively different packages of sites, with landscape information, could be put out to consultation. The determination of such packages would, it is felt, be quite difficult as there could be several options.

Although theoretically possible the effort and time required for this option is extensive.

If this option was chosen then WBC would be recommended to endorse the examiner's recommendation and that SMPC would undertake to rework the NDP in the light of that recommendation. SMPC would then need to organise a new committee to take this matter forward.

Option 3 Conclusion

This option is not recommended as the time and effort to undertake it, with the major possibility that the same conclusion as the present NDP would be reached, is excessive.

Appendix 1 – [The Landscape Capacity Assessment is circulated as a separate document.](#)

Appendix 2 Comparison of options.

Factor	Option 1 NDP to referendum with MOR006 with up to 110	Option 2 Abandon NDP WBC make decision on development sites	Option 3 Revise NDP with more sites, consultation and examination
Provision of 110 homes	Very high probability will provide close to 110 homes	Will depend on which site(s) are selected.	Will depend on which site(s) are selected.
Landscape assessment	Would mean slightly relaxing landscape recommendation by building just below 90m contour mitigated by good landscaping treatment to mitigate visual intrusion on the wider landscape	Will depend on which site(s) are selected. The same landscape constraints will apply	Will depend on which site(s) are selected. The same landscape constraints will apply
Social Role	Excellent as this option has far and away the best accessibility	Will be worse unless only MOR006 is selected	Will be worse unless only MOR006 is selected
Economic role (only increase footfall for shops etc.	110 homes close to shops will tend to increase footfall	Will depend on how many homes are allocated. If it is 110 then this should be more or less the same as option 1	Should be more or less the same as option 1 as it is assumed 110 homes would be provided.
Environmental gain	The provision of over 3ha of open space is a major environmental benefit.	Will depend on which site(s) are selected. There is the possibility of gaining the 3ha of open space if MOR006 is one of the site(s)	Will depend on which site(s) are selected. There is the possibility of gaining the 3ha of open space if MOR006 is one of the site(s)
School & surgery space (90% questionnaire support)	This is the only option which should ensure land is made available for the school and surgery.	Will depend on which site(s) are selected. There is the possibility of gaining the land if MOR006 is one of the site(s)	Will depend on which site(s) are selected. There is the possibility of gaining the land if MOR006 is one of the site(s)
Vision The rural character and setting of the parish will remain with the minimum of intrusion on	Least use of green and agricultural space	Will depend on which site(s) are selected. If more than	Will depend on which site(s) are selected. If more than one site will have greater intrusion.

the existing surrounding green and agricultural space.		one site will have greater intrusion.	
Vision Retaining the best landscape and architectural features of the parish	There will be minimal intrusion onto the better landscape below 90m	Will depend on which site(s) are selected.	Will depend on which site(s) are selected.
Vision Minimise extension to the existing Settlement Boundary and disallow further ribbon-style developments, thereby maintaining a compact village	This has the least extension.	If more than one site selected will have greater extension of Boundary.	If more than one site selected will have greater extension of Boundary.
NDP Principles ensure that new residential developments will be within or adjacent to the existing settlement envelope boundary and, ideally, close to the centre of the village (Post Office, bank). (73% questionnaire support)	Clearly the best option being extremely close to the centre of the village.	If MOR006 not chosen as single site the distances to the village centre will increase markedly.	If MOR006 not chosen as single site the distances to the village centre will increase markedly.
NDP Principles Encouraging and enabling walking and cycling to the village, reducing the need for car usage -(88% questionnaire support)	This is nearest the centre and with a pedestrian/cycleway only access next to village centre it will give the maximum encouragement	No sites other than MOR006 have such a good pedestrian/cycleway link to the village centre.	No sites other than MOR006 have such a good pedestrian/cycleway link to the village centre.
Economic use of land	This will provide homes on developable land at reasonable densities	Will depend on which site(s) are selected. If more than one site then it will be less economical use of land.	Will depend on which site(s) are selected. If more than one site then it will be less economical use of land.
Cost to SMPC	No further costs.	No further costs.	This option would involve immediate costs and effort to rerun consultations etc.

Appendix 3: Approximate Walking Distance (metres)

Location	MOR001	MOR006	MOR005	MOR009
St J's School	570 (725)	160 (285)	716 (881)	774 (824)
St M's School	746 (901)	1440(1565)	2050(2215)	2100 (2150)
Dentist	685 (840)	325 (450)	605 (767)	813 (863)
Doctors	1110(1265)	760 (885)	497 (662)	525 (575)
Station	1400 (1555)	1960 (2085)	2700 (2865)	2740(2790)
Budgens	691 (846)	344 (469)	770 (935)	661 (711)
Village Hall	762 (917)	422 (547)	500 (665)	919 (969)
St J's Church	570 (725)	214 (339)	716 (881)	774 (824)
Methodist Church	726 (881)	404 (529)	546 (711)	891 (941)
Additional distance from the furthest part of the site from the access point	155	125	165	50

The colour coding relates to the guidelines in the table above is explained below.

These are approximate walking distance by the roads from the entrance to the site. In case of MOR006 it is from the entrance by St John's school or main entrance depending on which is closer to the destination.

The distance from the furthest part of the site from the access point is given for completeness. The total distance from the furthest part of the site to a location is shown in brackets.

The Chartered Institution of Highways and Transportation (IHT) Guidelines describe 'acceptable' walking distances for pedestrians without any mobility impairment. They suggest that, for commuting and education, up to 500 metres is the desirable distance, up to 1000 metres is an acceptable distance, whilst up to 2000 metres is the preferred maximum distance.

Table 2.1: IHT Recommended Walking Distances

Trip Purpose	Commuting/School	Other Journeys (Retail/Shopping)
Desirable Maximum Distance	500 metres	400 metres
Acceptable Maximum Distance	1,000 metres	800 metres
Preferred Maximum Distance	2,000 metres	1,200 metres

Over Maximum Distance

Manual for Streets identifies that walkable neighbourhoods are typically characterised by having a range of facilities which are within ten minutes (up to about 800 metres) walking distance, but that this is not an upper limit. Guidelines for

Providing for Journeys on Foot (2000) sets out that the 'preferred maximum' acceptable walking distance to town centres for pedestrians without mobility impairment, which may be used for planning and evaluation purposes, should be 800 metres but it recognises:- *".....that it is not always possible to achieve ideal results in all situations due to site constraints, costs or other practicalities and that compromises must sometimes, rightly, be made."* and it goes on to advise that some 80% of walk journeys in urban areas are less than 1.0 mile long and that the average length is 1.0 kilometre (0.6 miles) and that this differs little by age or by sex.