

Application Site: Sandlesford Park, Newbury, Berkshire

Application Reference: 20/01238/OUTMAJ

LPA: West Berkshire

"20/01238/OUTMAJ | Outline planning permission for up to 1,000 new homes; an 80 extra care housing units (Use Class C3) as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150 sq m, B1a up to 200 sq m) and D1 use (up to 500sq m); the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works. Matters to be considered: Access. Sandlesford Park Newtown Road Newtown Newbury"

This application is effectively the resubmission of earlier applications, 16/03309 which was refused and an as yet undetermined application 18/00764 for development, forming the eastern part of Sandlesford Park allocation (under the 2012 strategic site allocation CS3 and subsequent Sandlesford Park SPD, 2015), for Newbury. CS3 requires that at least 1000 homes are to be delivered by 2026.

Landscape Character Baseline (LCA)

The LVIA forming part of the ES utilises a now out of date Landscape Character Assessment. WBC adopted a new character assessment in 2019 (carried out by LUC) and the Site forms part of a Woodland and Heathland Mosaic Character Type. The Site falls within WH2: Greenham Woodland and Heathland Mosaic - this new part of the Council's evidence base has not been considered in the process - in fact the LVIA Chapter and accompanying Figures appear to be largely the resubmission of the previous document (dated 2017) without any updates.

As a result, the more up to date key characteristics, value attributes, sensitivities have not been identified/updated using the most recent information and this has not informed or influenced the scheme's design, which remains essentially unaltered. As a

consequence, the assessment of effects does not assess the correct LCAs (WH2: Greenham Woodland and Heathland Mosaic; or the important interaction with the narrow, but critical UV4: Enborne Upper Valley Floor (and the cross boundary interaction to Basingstoke and Deane)). The proposals do not demonstrate that they accord with the Landscape Strategy for the LCAs having not incorporated the scheme changes from the previous submission - see below.

Given the largely soft nature of the transition from the settlement edge to rural landscape of the Greenham Woodland and Heathland Mosaic, and taking into account the value attributes of this rolling landscape, which comprises a rich tapestry of highly sensitive Ancient Woodland blocks and copses, shallow river valleys, with undulating meadows and agricultural land beyond the settlement, these components form part of a highly attractive and appreciated landscape incorporating numerous heritage elements, and a strong and cohesive structure, forming a key part of the setting to the south Newbury and extending into the wider landscape, incorporating the River Enborne (Upper Valley Floor) and Highclere and Burghclere, within the district of Basingstoke and Deane. As such, the Site within this complex landscape forms part of a Valued Landscape for the purposes of the NPPF170.

Land to the west

The Council strategy has to date sought to ensure that the holistic and comprehensive delivery of the entire allocation (i.e. including land to the west of the application). In addition, an associated access via Warren Road forms part of the comprehensive approach but is not within the control of the applicant, although we are aware is currently subject to another separate application.

This application unfortunately, only provides for part of the strategic allocation required by CS3, the Sandleford Park SPD (Principle S1) and HSA DPD (Policy GS1) requires a single planning application), there are several important yet unresolved elements at the interface between the separated parts, including (but not limited to):

- Land shown as 'Education Land' within the application, forms part of an extension beyond the Site, there is no masterplan detail for that area within this application and therefore there is no justification for the automatic removal of any trees shown on the Barrell Tree Protection Plan (TPP). Until, the school extension is designed in detail, there is no way of knowing the shape or extent of land required (if required) and thus it is premature to seek removal of mature trees, including veteran TPO oak and boundary trees. However, it is recognised that the Planning Statement (LRM Appendix 3) includes reference to a feasibility study for the school; however, this only shows one way of achieving a particular outcome. It does not, for example, have regard to the effect (or loss of) on important existing combined features (boundary vegetation, veteran tree or Ancient Woodland) or seek to retain them - it appears the plan would cause the removal of a Veteran Tree, historic boundary vegetation and encroach on the Ancient Woodland Buffer. It also does not explore alternative solutions of for example positioning a 90°rotated pitch (north east-south west orientation) at the very south eastern edge of the 'Education Land' (or a slight increase in footprint). This highlights the importance of working with a comprehensive approach, and in this regard the lack of coordination between elements has led to a singular outcome and an unnecessary effect on landscape resources. An alternative approach (by repositioning and rotating the pitch) would allow a far superior solution to be developed, with the added benefit of retaining/ protecting important existing features and space to enhance the landscape (and school masterplan) further, providing a greater green infrastructure network with connectivity between the Ancient Woodland (and buffer), retained Veteran Tree and retained historic boundary vegetation, with new connective planting across the school site and minimal impact on adjacent housing numbers.
- Development Footprints on the Barrell TPP appear to fall within the Construction Exclusion Zones (CEZs). There are

numerous examples of this including (but not limited to) the extensive Monks Lane frontage hedgerow/treeline, the boundary interface of the Site with Newbury College, the northern tip of Slockett's Copse, the south-eastern tip of Crooks Copse, the boundary of Sandleford Park West including part of the adjacent school boundary, the northern tip of Gorse Covert and southern tip of Dirty Ground Copse. It is also unclear why these plans do not incorporate any Exclusion Zone around Waterleaze Copse (through which it is proposed to create an Emergency Access) and access road to the A339. Exclusion Zones between and around Slocketts Copse and Highwoods Copse are also not shown, in areas where significant engineering, drainage and associated works for SUDs has been illustrated on other plans/documents).

- Furthermore, the proposed access point for 'All Traffic Modes' does not appear to be in the best place along the western boundary (of the western Neighbourhood Area), for such a wide strategic route - the Barrell TPP plan does not identify any specific tree removal, although from an on Site review it appears inevitable that the selected position will sever the boundary and likely require the removal of tree(s) (possibly trees that have since grown post survey); however, there appears to be better access elsewhere to a thinner less constrained section with no trees, along this western site boundary, a little further to the south, which should be explored (particularly if this scheme is being delivered comprehensively).
- The access along Warren Road seems to be a critical element to the delivery of a comprehensive scheme and cannot be ignored. It appears that the Warren Road access is subject of another separate planning application; however, the nature and detail of the access is an important element in landscape terms - especially considering it has existing width constraints and mature trees, including veteran ones and TPOs). We are aware of previous discussions regarding access options onto Warren Road. The application does not consider this access,

although it is necessary in some form for the delivery of a complete allocation. Although not being considered here, the retention of an important historic tree line, including veteran trees and TPO trees are essential to maintain the integrity of the historic tree line (avenue) and the character of Warren Lane (constrained by its width) and should not only be a key consideration of the comprehensive masterplanning approach, but also in combination with any options being considered at Park House School.

Link between Neighbourhood Areas A and B

The Core Strategy and Sandford SPD establish the principle for the creation of a bridge between the western and northern Neighbourhood Areas A and B across the sensitive wetland valley crossing. Any form of crossing will inevitably cause harm to the character and appearance of the valley (and this should be recognised in the LVIA, but has not); however, the SPD specifically requires:

- "a high-quality low-level bridge"
- "...avoid the need for large scale earthworks".

Neither of these fundamental requirements have been addressed in the package, and the proposals offered (Vectos plan VD17562-SK014) are unacceptable in their current form, comprising large scale 1:3 earthwork/ embankments on which to sit a new road with lighting extending out across the whole valley, leaving a narrow culvert through which the existing watercourse would pass. The extent of the construction footprint with embankment trows appears to be approximately c.40-45m width (a direct loss of valley sides/floor), and there are concerns as to the extent of the works in relation to the existing trees at the woodland edge, which are shown to be in conflict on the Vectos plan, but not considered at all in the Barrell Tree/ AIA work. An innovative high-quality design for a bridge perhaps with a sinuous profile would provide a well-considered approach in line with policy (including the CA7 Valley Crossing Development Principles in the SPD), that also allows for the retention of valley trees, the open grassland corridor, which is

otherwise severed by the incongruous structure currently being proposed.

By contrast, the creation of a steeply embanked road creates a physical barrier to public access and renders the footpath accesses within the valley floor shown on the Development Proposals (DAS p.45 and other documents) that converge and towards rear of the Rugby Club/Surgery, and shown as a 'Key Footpath / Cycle Link' on the parameter plan, as unworkable and is therefore an unacceptable proposal. As highlighted in L7 of the SPD (p.36), *"The design of the access road across the valley is crucial to maintaining the landscape character of the valley. The views up and down the valley should not be lost and lighting should be kept to a minimum to maintain a dark north/south corridor. It should be designed to respond to the landform and minimise damage to the tree cover on the valley sides"*.

It is recognised that any solution will have some adverse effect on the character and integrity of the open valley corridor; however, a well-considered design will help to lessen the harm caused, rather than the unacceptable approach taken at present, which also severs Barn Copse and isolates part of the valley from the wider area (significantly reducing the green infrastructure connection). Assuming a connection through to the western part of the neighbourhood allocation is still required by the Council then maintaining the integrity, character and connectivity of the historic landscape corridor and the retention of its inherent features and attributes (for example as part of a 'Wetland Corridor' character area, as shown in principle on page 54 DAS) is absolutely fundamental to the achievement of a successful scheme.

Furthermore south of Crook's Copse, another bespoke valley crossing solution is required for the same reasons as above (being provided as indicated in principle on p.28 DAS, as one of six 'Crossing Points'), to maintain the integrity of the valley form and to ensure further Ancient Woodland is not cut-off and isolated from the rest

of the country parkland, and in line with Green Infrastructure principles of connectivity and NE Standing Advice.

Outdoor Play and Recreation

The proposals as outlined in the design and access statement (p.48) refer to the provision of outdoor play space and reference old (superseded) 2008 documentation - the Field in Trust 6 Acre Standard, 2015 is the 'benchmark' standard for outdoor play and recreation. Currently, it is unclear if the proposals conform to the standard in terms of NEAP, LEAP and LAP provision numbers, space allowed for each, and the walking distance/time to facilities, given the location(s) the developer has chosen to place these features, which is different to the aspirations shown in the SPD. As such the extent of development (albeit recreational) extends further eastwards towards Sandleford Priory than previously envisaged in the SPD, which showed LEAPs and NEAPs within the heart of the developable areas, hence the need for additional mitigation.

Notwithstanding the above, it is recognised that previous discussions have taken place to agree a strategy and reduce the harm caused to Sandleford Priory and the Registered Park and Garden a result of the NEAP's location (beyond the developable area), which incorporates strategic planting (and has been presented by wireframe images).

Ancient Woodland

The application suggests in various places that a 15m buffer from Ancient Woodland has been provided; however, parts of the layout (albeit small) appear to show that the development is likely to encroach into the buffer at various locations and furthermore there are various concerns about the nature and extent of works being left to detail at RMA stage (if it were approved), which may result in further impacts on Ancient Woodland (for example SUDs features and swales/ditches, paths, emergency access, watercourse crossings). Whilst the Sandleford SPD, 2015 suggested that the 15m should be taken from the centre of the tree trunk; it is unclear whether the more recent Natural England Standing Advice has been taken into

account, which states clear guidance on the various potential impacts and sources, which may influence the buffer required to a different measure (sometimes larger). Similarly, adequate protection should also be provided for individual trees (including in particular those shown on the Ancient Tree Inventory), in line with NE Standing Advice.

One such example of concern in landscape terms is the (comparatively) narrow gap between High Wood and Slockett's Copse, where new engineered SUDs features and pathways and 'conveyancing channels' (p. 51 of the DAS) seemingly constructed within 15m of the protected woodlands appear to be proposed. Notwithstanding the above, Magic mapping identifies the same land as falling within Woodland Priority Habitat, as are many of the Ancient Woodland offsets. We also have concerns over the FRA & Drainage Strategy by Brookbank, which appears to show detention basins of almost equal volumes to their areas, suggesting difficulties balancing engineering constraints (steep side slopes) versus an visually acceptable meadow feature (shallow side slopes) has been left for Reserved Matters and needs to be addressed given the proximity of these features to Ancient Woodland and the parkland characteristics. This is also evident in the Transport Assessment (Vectos Appendix E) which appears to show a new Emergency Vehicle access (and Cycle Route) slicing through part of Waterleaze Copse Ancient Woodland and the stream (forming part of the extended shallow valley feature feeding the River Enborne). The SLR Character Appraisal for the land, LCA2h Waterleaze Copse, notes the high value and sensitivity of this landscape feature, but the direct harm that would be caused, including to the Ancient Woodland feature by the creation of another engineered route and a further means of vehicular crossing across the 'wet valley' has not been identified or assessed in application documentation (eg Barrell AIA Tree Report, LVIA etc,.). The lack of a comprehensive assessment highlighting the site constraints, including tree constraints/offsets should be corrected, and then used to guide the developable areas where work can take place in proximity to Ancient Woodland. At present, it is too ambiguous to be able to have certainty that the integrity of the

woodland (and woodland floor, groundwater) will not be affected, and should be carefully examined by the relevant professionals.

Furthermore, the scheme design appears to compound the physical isolation or separation of some of the Ancient Woodland features, which are contrary to the Standing Advice (NE).

LVIA Effects

Landscape Effects Part 1 (Table G6).

The Landscape Effects do not assess the change to the character in Yr1 Post Construction or Yr15 Post Establishment, or the longevity associated with further woodland management in line with the Management Plan.

Notwithstanding the recently updated 2019 Landscape Character Assessment (see earlier), which is referred to earlier; the LVIA tries to incorporate a number of negative aspects associated with the former 1993 LCA, such as 'destruction of parkland by mineral extraction and commercial after use', whilst these may form part of an aspect of the character area elsewhere, it is difficult to see how they characterise the Site itself to such an extent. As such, we consider any suggestion of Low or Low-Medium scores (in respect of Value, Susceptibility and Sensitivity) to be understated when considering the key intrinsic and highly sensitive landscape features/elements within the character area and the features themselves, such as woodland, arable land and the central valley and footpath network, the topography, open views, importance of woodland block (ancient woodland) and the setting of the town. One such example includes under 'Scenic Quality' for Northern and Western Park is claimed to be Low - yet Viewpoint Q provides a highly attractive rural vista along the track beyond Warren Lane approaching the Site and Viewpoint R provides a completely unhindered rural view, with attractive rural fields and long vista between ancient woodland blocks. This does not provide any indication of an area being 'strongly influenced by existing development' being claimed within the assessment of the (old) district LCA. It also does not justify the assessment of

Agricultural Fields Low-Medium scores for the Northern and Western Part or the 'average quality', 'largely featureless' judgements. 'Sense of Openness and Enclosure' does not acknowledge long vista exists between foreground woodland, out towards the ridge or the attractive intimate qualities of the track green way. Whilst in the 3a Northern Parkland the agricultural fields are narrow and feel more contained by the proximity of settlement edge and woodland, the presence of housing on Monk's Lane is still relatively discreet, given the extensive vegetation lining the road (and as can be seen in Viewpoint U on 3A).

Despite some limited influences at the settlement edge, the rural character is very quickly appreciated in this landscape due to the interaction between the mosaic of woodland, hedgerows with trees, open agricultural fields and meadows. (In a similar way that the LVIA repeatedly contends that the proposed residential development would be well contained by woodland, the same is certainly apparent for the existing settlement edge, which is contained by similar features).

The West Berkshire Landscape Sensitivity Assessment (2019)- Newbury (parcel 18D Sandford Park and 15B Wash Common Farmland) identifies sensitivities of the land that need to be taken into consideration and considered as part of the LVIA.

Landscape Effects Part 2 (Table G6)

It is difficult to understand how a judgement of beneficial effect of Major Magnitude and Substantial Significance has been reached (for the 'Degraded Parkland' and the 'Southern and Eastern Parts' and 'Valley Corridor' 1A and 1B), the landscape comprises changes that are not so substantive to the character of the South West Margin. The text refers to 'retention of existing woodland', the main change will be localised to its condition through management, plus additional planting to Waterleaze Copse and the introduction of parkland trees and meadows; however, the introduction of metalled cycle routes/ footpaths, the NEAP, engineered SUDS features with

steep sides, new conveyancing swales, multiple bridge crossings over existing watercourses and new conveyance swales, and the adjacent presence of new housing and lighting (which will be visible until new planting has established fully) introduced at close proximity will also be new features and contribute to a change in the character to a modern country style parkland (as opposed to a restored historic parkland), as some of the features serve to benefit the future housing population, not as a response to the historic map regression (i.e. the presence of NEAP and SUDs detention pond in themselves do not form a precedent in historic character terms). The Transport Assessment Appendix E (Vectos) identifies on plan, the need for emergency access off the A339, which partly utilises the proposed cycle route incorporating an additional 1m grasscrete strip, in addition to the existing PRoW (running parallel), extending the overall width and cutting across the parkland area. The engineered route will also require a deviation across parkland to circumnavigate existing trees (away from the historic track line), as well as further (vehicular standard) crossing point across the broad 'wet valley', which require engineering works, the detail of which are not shown (including on the masterplan) or other documentation, but will inevitably add to the harm caused on the parkland and sever part of Ancient Woodland at Waterleaze Copse towards its northern edge; furthermore, the changes to the landscape are also not shown on the wireframe photomontages from Sandleford Priory, or considered in the LVIA or in any Arboricultural report. As discussed earlier, the concern as to the area of SUDs detention basins being almost equal to their volume is a concern as to the engineering aspects of their profiles and how fenced (if fenced) - they may appear very standard domestic/ housing estate like). It is also considered that as the new bridge crossing (directly effect on the meadow valley and extending to southern parkland) will intrude across the northern meadows, it will consequently influence (negatively) the character of the parkland area to the south. (note: the ZTV plan (SLR 7.6A) whilst useful to a point, only selects highlighted 'target points' of the developable areas to ascertain visibility, so not all the

elements of the scheme such as bridge crossings, or the NEAP are fully represented). It is also untenable to conclude that the effect on the valley would be a reversible effect or resulting in a Major Beneficial Effect of Substantial Significance. The Valley Corridors '1A and 1B - Viewpoints A and B' at present represent wholly rural and undisturbed character already in the two valleys, and the landscape effects would be significant and permanently adverse resulting from the bridge crossings (being one of the new elements of note in the Valley Corridor), and other associated elements of the scheme mentioned above.

Monks Lane currently provides a strong transition between the urban and rural area due to the contrasting nature of land uses and presence of established vegetation and will be subject to new access arrangements, including new junctions, a large roundabout with new lighting, requiring the removal of mature hedgerow with trees along the frontage. We note the extent of vegetation needing to be removed does not appear to consider the visibility splay requirements or the quantity of vegetation needing to be removed to accommodate the proposed development and access. The vegetation removals appear to be greater than that shown on the Tree Plans (Barrell). The Landscape Effects fail to assess the direct loss of tree and hedge vegetation or the change in character to Monk's Lane resulting from development and access changes (only the visual change is noted) and the significant loss of a well-established treed hedgerow frontage. The introduction of new housing and additional lighting will form an intervening feature along the road, enclosing the road with new built development and removing its association/ contribution of the wooded edge characteristics running up to the edge of the well-defined settlement and harming its transition to the wider landscape beyond (see in Viewpoint 5 for visual effects).

Visual Effects (Table G6)

We note all the photographs being used date back to 2017, and it is not clear if the assessment considers any baseline changes that have occurred.

The assessment does not appear to distinguish between winter or summer effects (although the old photographs were taken in winter).

Viewpoint 5: We disagree with the effects on visual amenity assessed from Monk's Lane - the Lane currently provides a strong transition between the urban and rural area due to the contrasting nature of land uses and presence of established vegetation and will be subject to new access arrangements, including new junctions, a large roundabout with new lighting, requiring the removal of mature hedgerow with trees along the frontage. We note the extent of vegetation needing to be removed does not appear to take into account the visibility splay requirements or the quantity of vegetation needing to be removed to accommodate the proposed development and access. The vegetation removals appear to be greater than that shown on the Tree Plans (Barrell). As a consequence, the direct loss of vegetation and the magnitude of change to the road users will result in a significant change to visual amenity apparent along much of the road frontage.

Viewpoint 6: We consider the magnitude to be greater than stated, and the suggestion that 'new structure planting' will soften views is not agreed with, given the development is tight to the boundary of the college and there is little in the way of strategic planting - the effects will not reduce as suggested without increased structure planting on the boundary.

Viewpoint 8: We do not consider the effects from Sandleford Priory to be 'Reversible' or 'Negligible' in terms of Magnitude or Significance. The construction and early effects are considered to result in limited (adverse) views of the development and the NEAP particularly in winter, for some time until the proposed planting has established, whilst the foreground will include potentially engineered detention basins, the removal of trees from Waterleaze Copse and the new cycleway and emergency access with further structures across the watercourses - these effects should be acknowledged - and consider potential effects from the wider

Registered Park and Garden landscape. It would be helpful if early delivery of the planting takes place to accelerate the establishment period in respect of the NEAP and housing on more elevated ground.

Viewpoints 14, 15, 16 and 17: We do not consider the assessment takes into account the view north towards the new crossing point between the main Development Parcels (seen from 16 and 17), and since there would also be glimpses of the proposed housing and the NEAP, between Dirty Ground Copse and Gorse Covert prior to the establishment of planting, which would be an adverse effect (not negligible or beneficial). These views also do not consider the change in foreground views of the 'offline' emergency access or the severance of Waterleaze Copse resulting in the loss of trees, or the potential engineering associated with the SUDs basins and the various crossing points (including vehicular) in this part of the valley.

Viewpoint 18: Looking north, we consider the effect to be greater than stated and the established view after 15 years would be less than a moderate benefit (moderate to substantial significance) in visual terms. Looking south the park land will become more domestic in nature, the detention basin may result in a more engineered appearance, together with metalled surfaces formalised for walking and cycling.

Viewpoints 19 to 25: In view 20 the view (is conveniently hidden behind the hedge, take a few steps forward) will have views of the NEAP, which we disagree with the judgement of 'slight benefit'. It introduces a wholly uncharacteristic element into the rural parkland, currently an undeveloped area. Viewpoints 21-25 we concur would have a Major Adverse Effect; however, we are concerned that the assessment considers the effect would reduce to Moderate in 15 years; we consider there is no mitigation that would reduce the harm caused by the total enclosure of a currently open rural path, being subsumed by housing on both sides. Its amenity and character

will be totally altered by enclosure with housing, remaining a Major Adverse Effect.

Summary

In summary the proposals result in a large scale residential led development at the southern edge of the town on currently open rural land forming an attractive landscape setting that comprises a mosaic of interlinked features including Ancient Woodland, grassland, agricultural land, historic hedgerows and watercourses and ditches. The LVIA is currently deficient and requires updating to reflect the latest 2019 Landscape Character Assessment and all the required elements and components of the scheme need to be incorporated into the assessment of effects. There are a combination of unresolved elements as detailed earlier in this report; a lack of consideration in AIA of embankment crossing or the crossings themselves; lack of assessment against the appropriate LCA; inadequate assessment of impact on Ancient Woodlands; lack of adequate consideration in the assessment and conclusions of landscape and visual effects of proposals (creation of emergency access and further crossing point(s), NEAP, engineered nature of SuDS features, access arrangements from Monks Lane, the valley crossings). In summary the LVIA appears to be a resubmission of a previous report with no update accounting for the revised scheme being considered and, as a consequence, the nature of the changes and the effects in the assessment are understated or omitted entirely.

Notwithstanding the above, the LVIA already acknowledges that proposal results in significant harm to landscape and visual resources of the Site. In light of this, the above, including additional concerns and omissions highlighted in this report, it is concluded that the scheme in its current form should be refused on landscape and visual grounds. The proposals fail to take account of key characteristics and special features, which are sensitive and form highly valued components in this complex landscape and will result in an unacceptable level of harm, with significant effects on the landscape character and visual resources, contrary to the

Council's Policies and would fail to protect or conserve a valued landscape, as set out in the NPPF170, which recognises the intrinsic character and beauty of the countryside, including trees and woodland.

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