

Application Site: Sandford Park, Newbury, Berkshire **Wheatcroft Consultation: Landscape and Visual Matters**

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. Sandford Park Newtown Road Newtown Newbury”

This consultation response is a ‘Wheatcroft Consultation’ and follows the refusal of the above application. The Applicant has appealed that decision and issued further information on 1st February requiring review – this consultation takes into account the new/ updated information that has been provided. The Wheatcroft submission includes a document prepared by LRM planning consultants (titled ‘Response to comments for Consultees’) with various inputs including,

- a detailed response to the Landscape Consultation (for the refused application), by LRM Section 5, with various comments and updates.
- a revised tree survey, Barrel (October 2020)

and other inter-related topics such as highways (section 2) and Vectos reply (Appendix 4), drainage (section 3), arboriculture (section 4), and ecology (section 7) (for example) which have elements that overlap with the landscape and visual matters. Notwithstanding the most recent submission, the LVIA ES Chapter from the EIA has not been updated since 2017 or 2019 to consider the latest information, or a Technical Update note provided on Landscape and Visual Matters, which would have been helpful.

LRM 2.4-2.7: We welcome the new approach taken to review options for the Main Valley Crossing, since the submission information did not comply with the requirements of the SPD. At

this point, we cross refer to the additional information supplied in the Statement of Case (LRM 201217) at Appendix 4 Valley Crossing Study, which now presents the approach for two crossings.

Main Valley Crossing

In providing new examples (appendices 1-3), from a landscape and visual perspective the approach represented by SK023/ SK003 goes part way to addressing the criteria set out in the SPD (and as requested by the Kirkham Landscape Planning previously). However, we would advise that one 'bridge abutment' still encroaches into the valley side and should be pulled back much further to the west (as it is on the east side), otherwise the recontouring shown (in orange) will unnecessarily narrow the valley and cause the loss of further trees (orange contour lines show this) and conflict with open views and character. We maintain this approach will also be subject to the satisfactory consideration of height, materials, 'weight' (as in light weight), open columns, colour finish, lighting etc., in due course. However, we also note that a second parallel structure is being provided, since there are separate applications across the allocation, and we note the CA7 Valley Crossing (p.79 SPD) refers to a single crossing - ie it is not presented as a comprehensive scheme. In any event, the introduction of the Valley Crossing (and its impact on the valley or views) has not been assessed in the LVIA under any scenario, although LRM appear to acknowledge harm at 2.8 and 3.1 and the requirement to comply with the SPD and minimise harm.

Crooks Copse Link

Notwithstanding that the Council (highways team) requested this link to address their concerns regarding the distribution of traffic throughout the whole of the allocated site, the approach to the Crooks Copse link is still unacceptable in landscape and visual terms and contrary to the SPD and will sever the valley profile and isolate the woodland, which is exacerbated further by the additional encroachment of built form on the valley sides (as highlighted previously). This can be resolved by following a design approach which accords with the SPD, as has been advanced (only in part) for the Main Valley Crossing (above) and ensuring the approach fits with CA7 Valley Crossing key design principles and L7, which seeks to ensure views and character are maintained. As above, the harm caused by the current proposal has not been assessed in the LVIA or any subsequent documentation. The explanations provided in 4.4 and 4.5 of the Crooks Copse Link text, do not acknowledge the extent and degree of harm arising.

LRM 2.8: Attention is drawn to a new emergency access (width 3m or 3.75m) which is intended to run adjacent to the Public Right of Way footpath. Notwithstanding this, there is also a proposal for a new cycle route to also run adjacent to the same Public Right of Way and the same emergency access. Whilst the LRM response doesn't make reference to the Cycle Route it suggests this can all be conditioned, and that design would take into account the proximity to Waterleaze Copse (Ancient Woodland). There can be no doubt that the aggregation of an upgraded public footpath, alongside a new surfaced cycle way, plus a (concrete/metalled) emergency access in totality will lead to a hard surfacing across the country park land (no hard surfacing exists at present) and that increased width also has the clear potential to require direct tree removal of, and in the vicinity of, Waterleaze Copse (Ancient Woodland) and other locations along the currently unsurfaced track approaching the A339, as well as require a crossing point over the shallow river valley, none of which has been assessed. In terms of the LVIA, the likely nature of the proposals (which remain unclear), will cause harm to landscape and features associated with the landscape resource and this has not been acknowledged or assessed.

LRM 3.6 and 3.7: Whilst the basins and ponds are acknowledged to be illustrative in outline, LRM suggest there is "no explicit reference to a required slope gradient". However, the SPD makes clear reference at H2 (p.43) that "...must have regard to the topography of the site; the land uses both developed and public open space and the existing springs and woodland areas". H3 (p.44) also emphasises that they are "a place for people to enjoy nature and relax". Despite the D&A (p. 55) stating the "retention of ancient, semi natural woodland areas and trees within a 15m buffer of grassland and scattered native scrub", LRMs response at present simply outline one possible approach to amend a 1:4 slope and claims all the ponds are in the Country Park "with extensive open space" – this assertion is not correct. Some of the ponds are tightly squeezed onto already sloping ground of the valley sides in between Ancient Woodlands. Furthermore, the same space is already occupied by an existing watercourse, which runs through the valley to the Enborne, and the space is proposed to be occupied also by 'conveyance channel' as well as a cycle route and footpaths such as the Foraging Trail and 'Sandleford Mile', increasing the pressure on or within the Ancient Woodland buffer; whereas the SPD key design principle clearly states (CA9, p.81), "the undeveloped nature of the valley corridors will be retained though the sensitive arrangement of the development edge in key views"; it also states for setbacks/buffer zones that, "...they can be used for informal recreation and planting and informal footpaths", indeed LRM suggested previously that a typical informal path, would be a mown type in grass. No sections have been produced to show the existing and proposed

landform with all the existing and proposed features shown. As a result, our concerns about impact on the integrity of the woodland buffers and the interconnected valley sides are still applicable, and the impact of the aggregation of engineered features in the buffers and valley has still not been addressed comprehensively, or as part of the LVIA.

LRM 4.1 and 4.2: It is welcome to see an acknowledgement that “the removal of trees and hedgerows is necessary” and that, “It is accepted that this affects more trees than shown in the Arboricultural Report”.

However, whilst LRM maintain their approach is consistent with the SPD and highlight in particular page 45 of the D&A, as well as the Key Design Principles for Monks Lane Character Area; it is evident that in applying their own principles as set out on Pages 69, 76 and 77 of their D&A Statement was 1. “the character of Monks Lane will be defined through the retention of the existing hedgerow and strategic planting” (p.76) and 2. “Retention of existing hedgerow and planting along Monks Lane” (p.77) and 3. “existing hedge and strategic planting to define character” (p.69). We also do not dispute the fact that trees in themselves (in arboricultural terms) may be categorised as low quality (C), but in landscape and visual terms, as is the case here, their presence as part of the established hedgerow frontage still makes a positive contribution to the character of the settlement edge and their loss will be clearly apparent, if the street elevation shown on p.76 is delivered as shown). Therefore, having recognised the late acknowledgement of greater vegetation removal along the frontage in question along with the original strategy being taken in the D&A, we maintain that the LVIA underplays the change in character and views along Monks Lane frontage at the edge of Newbury in the absence of a strategy to retain, mitigate or enhance.

LRM 4.6 and 4.7: We note there are still some discrepancies between the trees and vegetation that would need to be removed and have continuing concerns that more trees will need to be removed, due to the failure to include all elements of the proposed scheme in the arboricultural work carried out to date – including (but not limited to) Emergency Access and Waterleaze Copse and vicinity. We strongly disagree in landscape/visual terms the assertion at 1.2 of the Arb report that the Category A and B trees and tree groups ‘make only a limited contribution to local amenity’, and refer to our above comments in respect of Category C trees in addition.

LRM 5.1: We are aware of Ms Kirkham’s previous involvement in this project prior to ours but anticipate that any dialogue was in the spirit of the Council’s adopted SPD for Sandleford Park

and the illustrative plan at that time. However, the application referred to in 2018 is not the subject of this consultation.

LRM 5.1, 5.2: This Landscape Consultation, similar to the previous one does not seek to add any additional viewpoints locations, indeed we concur with the LVIA in respect of the selection of viewpoints. Whilst, the issue of valley crossings is being raised, it was done so because the crossings proposed do not comply with the SPD; it is only now at this stage through the Wheatcroft Consultation/ LRM Appeal Statement of Case, that an option more in line with the SPD approach has been forthcoming for the Main Valley Crossing. We comment on those options above in LRM 2.4 and 2.7.

LRM 5.4 - 5.9: It is useful to receive acknowledgement that the latest LCA has not been used, and that the site “remains sensitive”. Indeed, the LCA contains a number of aspects referred to in the text. The current Development Plan does not designate valued landscape, that approach has moved on and LRM will note the Emerging Plan Policy SP8 (and SP7) in relation to value, which refers to the need to respond positively to ‘valued features and qualities’, as well as the supporting text, which confirms that “value can apply to areas of landscape as a whole or to individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape. There are no locally designated landscapes in West Berkshire. All landscapes across the District have some degree of value and all development should therefore respond positively to the identified character and valued qualities inherent in that local landscape”.

LRM 5.10: In so far as a comprehensive development underpins the Council’s approach in the SPD and existing Policy, comments that refer to the whole allocation are interlinked. The disassociation with land to the west is noted and unfortunate, given that playing fields, emergency access and Warren Road issues are interrelated, and as a result this appeal scheme contains a number of elements that may otherwise not be required, but contribute unnecessarily to the landscape and visual harm.

LRM 5.11: The alternative approach is welcome; however, we maintain it is not necessary to lose T34 or the boundary vegetation. The appellant has demonstrated that the pitch can be rotated to accommodate the scheme proposed. Like all applicants they will be required to apply for planning permission and will need to justify and loss of trees or boundary vegetation and, given a

design is not available (and not part of this application) it is premature to seek the removal of any vegetation (historic hedge and trees G36/ G37 along the boundary or T34) that contribute to local character.

LRM 5.12: We refer back to our previous note, which raised concerns about development occurring within Exclusion Zones.

LRM 5.13: We refer back to our previous note, where it appears the selected position for access between the DNH land and Application Site may not be optimal for the reasons described, in relation to the potential issue of the Main Access passing in between 2no Category A trees within the hedgerow itself (T46 and T48), given the width of the main access. We are aware of the Category C status of the hedgerow and are aware of the need to punch through, but it should be at the weakest point.

LRM 5.15: We refer to our previous note, the SPD and FiT which set out requirements for location of the Play Areas.

LRM 5.16 and 5.17: We refer to our previous note, the SPD, the Council's ecologist, Natural England, NPPF, the current draft consultation NPPF (and others) who set out the minimum standards for Ancient Woodland and their buffers. We maintain our concerns as to the aggregation and accumulation of engineered/ man-made features within the buffers and the harm to character and visual resources as a result. A planning condition may be an option to be explored in tandem with the ecologists; furthermore, it may be necessary to agree wider buffer widths in more detail (so that they are all greater than 15m and respond appropriately to the sensitive context of each of their locations) and suitable space will need to be found for all the features being proposed.

LRM 5.18: We refer to our previous note, and acknowledge there are differences; however, LRM will appreciate that these judgements are usually formed by Landscape Architects and we maintain the use of expired 2003 LCA, older 2017 photographs and no updates to the LVIA or assessment from 2017, despite design changes and a new application in 2020 - the information is more helpful if it is current. For example, whilst LRM “..disagree with the visual points raised...”, they have (as outlined above) acknowledged, for example, that along the Monks Lane

frontage the extent of vegetation loss will be greater, therefore in respect of views along Monks Lane (no.5), the effect will be greater as a result (as we asserted in the original response).

Liz Lake Associates

2nd March 2021