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14<sup>th</sup> August 2020

**Application number: 20/01238/OUTMAJ**  
**Sandleford Park, Monks Lane, Newbury, Berkshire**

Greenham Parish Council approved submission of the recommendations, included in this letter, regarding Planning application **20/01238/OUTMAJ**. This approval took place at the Full Council meeting held on the 12<sup>th</sup> August 2020. Please see below for details of this approval:

**Proposed:** Cllr Sally-Ann Jay  
**Seconded:** Cllr Billy Drummond  
**Abstentions:** None  
**Against:** None

**Resolved:** To unanimously approve the comments to be sent to the Planning Authority for Planning application 20/01238/OUTMAJ with the addition of Cllr Jay's comments

**Additional Comments from GPC Councillor Jay** – In the section "If the planning authority is minded to approve..." the sentence in bold in (3a) should be carried forward and included

The recommendations included in this submission were produced by the Sandleford Joint Working Group (JWG), which includes members of both Greenham Parish Council and Newbury Town Council.

**Sandleford Joint Working Group**  
**Recommendations to Newbury Town Council and Greenham Parish Council re**  
**Planning Application ref. no: 20/01238/OUTMAJ**

**4 August 2020**

Sandleford Park, Newtown Road, Newtown, Newbury for Bloor Homes & Sandleford Farm Partnership

The Joint working Group recommends strongly that both parish Councils should call on the Planning Authority to refuse planning permission for this application.

The reports submitted and the research carried out are grossly inadequate and there are strong reasons for refusal.

## **1. Planning Principles**

### **1.A A single planning application for Sandleford Park:**

The Planning Authority's policy in this matter is set out clearly in the Sandleford Park (Supplementary Planning Document), 2015, which states as follows:

## Section F: Development Principles

### **S. Single Planning Application**

**S1. The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.**

The Core Strategy allocates Sandleford Park as a single site to ensure the optimum approach to the development and to deliver one community. A single application will therefore enable a holistic approach to a comprehensive development across the site which maximises its potential as a well-planned and sustainable urban extension.

A single application will also enable the development to be properly assessed as a whole to ensure that it achieves the vision and objectives for the site as set out within this SPD. This will enable the required infrastructure to be properly planned and delivered in an integrated and timely way across the site. It will also ensure that the site is designed as whole in a cohesive manner.

We support the planning authority's development principle in this matter, and we think it is essential that these lands should be developed as a coherent whole in one single planning application.

This application is not in combination with the remainder of the lands and accordingly permission should not be granted for this proposed piecemeal development.

#### **1.B Outdated planning framework**

The development of these lands was originally proposed in West Berkshire Council's Core Strategy 2006-2026 (adopted July 2012). Sandleford Park will not have delivered any new homes by 2026 (nor, in terms of current housing allocation need in the district, is it required to).

The Core Strategy is now out of date and does not reflect the current situation, as dictated by the Covid pandemic and the climate emergency. The models for housing delivery in the Strategy are also out of date and do not have regard to permitted development rights and the increasing level of conversions of commercial and other properties to residential.

The Council's Environment Strategy (6.2.5) states that "a robust and ambitious Local Plan for West Berkshire" that will "guide planning and development up to the year 2036" is "currently going through a process of review".

The Local Plan Review, to 2036, which is expected to be completed in 2023, will address these matters.

In view of this, we strongly believe that:

- 1 The Sandleford site should be reconsidered as part of the revised Core Strategy and Local Plan review process.
- 2 Any development proposal on these lands should therefore be deferred pending the completion of the Local Plan Review and any application for the development of Sandleford Park should be regarded as premature until the review is completed.

#### **2. Traffic Modelling & Active Travel.**

We find the Transport Assessment (TA) deficient in several respects, taking account of recent developments in national and local policy as well as the current Covid-19 and Climate Emergencies. A significant incentive for modal shift will be needed to reduce the motivation for residents of the new development to take to their cars, causing serious and unacceptable congestion on the highway network.

**2.A** The site is surrounded on three sides by busy main roads which the traffic from this site will make even busier. Apart from schools and a country park, there are no facilities on site, which is also separated from the Kennet Valley by a sufficiently steep and long hill to deter many cyclists.

**2.B** The build phasing proposed does not deliver any on-site retail, community, or employment facilities until very late on (probably well after 2031, which is the date for the VISSIM modelling). Even then, it will be barely significant in terms of its impact on peak traffic volumes.

**2.C** Therefore the location and design of junctions connecting cycling and walking routes within the site and those surrounding roads is extremely important. At all these junctions, people must feel safe, must be given priority over vehicles and must be offered direct and convenient routes onwards to their destinations.

**2.D** At present, the Transport Assessment shows little more than token concern for this. It assumes 'as the crow flies' distances, whereas pedestrians and cyclists do not fly and direct, safe routes for them through South Newbury urban area do not exist. Table 2.1 "Local Facilities" gives distances from "nearest proposed access", whereas site accesses are up to 1km from journey origins (homes) within the site. This puts Kennet Centre and Newbury rail station beyond the 2km regarded as acceptable walking distance.

**2.E** Apart from the A339 crossings onto Deadman's Lane and Pinchington Lane, which are both light-controlled and lead towards the main Newbury Retail Park, none of the new crossings of Monks Lane and Andover Road are proposed to be controlled by lights. The existing crossing of Monks Lane west of Rupert Road is well located and connects to existing quiet safe routes towards major destinations in the valley but the toucan crossing near Falkland Surgery does not lead to any safe crossing of Andover Road towards Monument Place facilities. The 'peanut' double roundabout there is unattractive and unsafe for pedestrians or cyclists.

**2.F** We therefore do not accept that the "Sustainable Access Strategy" set out briefly in 4.27 of the TA, is good enough. More needs to be done to "maximise the number of trips undertaken by sustainable modes", otherwise the traffic already predicted to cause queues of 80 vehicles at the St Johns Road [sic] roundabout (i.e. A343 / A339 junction which locally is known as Burger King Roundabout) will be even more severely congested.

**2.G** Specifically "inclusion of a local centre", mentioned in one of 4.27's bullets, is irrelevant as a means of reducing car journeys if the centre is not delivered until well after 2031 and is the wrong side of the central valley crossing for almost all the by then residents of the Bloor site in any case.

**2.H** Published this week and presumed to take immediate effect as national policy is the DfT's Local Transport Note 1/20 "Cycle Infrastructure Design". This strongly emphasises the need for cycling and walking to be given higher priority in all future highway design and traffic studies. In particular it highlights the dangers presented by "normal roundabouts", endorsing the comments of Spokes with reference to the previous 2018 Bloor proposals for the main spine road junction with Monks Lane. This is just one of numerous features of the TA which must be re-assessed if these proposals are to be acceptable. At present, this roundabout manages to destroy some 150m of good urban cycleway without replacing it with anything safe for a far higher potential number of cycle journeys.

**2.I** Linked to LTN1/20 is the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) which is due to be adopted by West Berkshire Council, as Highway Authority, in early 2021 and will form part of a refreshed Local Transport Plan soon afterwards. All proposals for Sandleford Park strategic site must be reviewed in the light of these policies.

**2.J** For the modal shift base assumptions to be valid, we believe the traffic modelling must await data that reflects the post-Covid economic and social "new normal". This may not be available until the next (2021) census. However, we believe that it would be irresponsible to make peak traffic predictions for Sandleford until this data is available.

**2.K** The application does not seem to take account of planning permissions given after the referenced traffic survey was done (the university planning app and associated works is a particular example of something creating large traffic flows that does not seem to have been considered). The traffic studies need to account for all current and known applications that add to the overall load on the surrounding roads."

### **3. Environmental and Ecological considerations**

#### **3.A Protection of the ancient woodlands at Sandleford Park**

Without significant mitigation the development is likely to result in deterioration of the ancient woodlands on site, failing to meet the policy objectives of the NPPF. Although standing advice from Natural England recommends a buffer zone around ancient woodland of at least 15 metres, there is a significant body of evidence suggesting large developments will have serious impacts beyond this distance. A recent study published in the *Arboricultural Journal* suggests that the root systems of trees in ancient woodlands, including oak which is the dominant tree species in the Sandleford woods, frequently extend to 25 metres.

In addition to direct damage to tree root systems, other impacts outlined by *Impacts of Nearby Development on Ecology of Ancient Woodland* (Woodland Trust, 2008, addendum 2012) include trampling, fly-tipping, vandalism, increased predation (by domestic pets and by wild predators such as magpies attracted to the area by gardens), introduction of invasive plant species, noise and light pollution, changes in patterns of shade, and nutrient enrichment. All of these would be insufficiently mitigated by a buffer of 15 metres. **The development should therefore provide a buffer of at least 50 metres around the ancient Woodlands, as recommended by the Woodland Trust**

We note that Wiltshire Council, in their core strategy adopted in 2015, calls for a 100m buffer between all ancient woodland and build development. The buffer should consist of semi-natural habitats such as woodland, scrub, grassland, and wetland planting, in line with Natural England guidance, and should not contain pathways or other infrastructure.

We also note the Woodland Trust's requirement, in their Planner's Manual for Ancient Woodland and Veteran Trees (2019) for "implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met". The outline monitoring plan contained in the Ecological Mitigation and Management Plan submitted by the applicants (Appendix F18) only proposes monitoring of bluebell populations. This should be significantly enhanced to include for example monitoring of ancient woodland indicator plant species and breeding bird populations.

With regards to trampling, we note that it is 'not considered ancient woodland indicators will be impacted as they are located along existing tracks' (Appendix F18). However, since the woods are currently in private ownership with no public access it is likely that use of the tracks will significantly increase. This should be considered when designing any access plan. The developer should consider only providing access on fenced boardwalks as currently proposed for the wet areas.

Clearly the width of a buffer to ancient woodland blocks makes a very significant difference to the number of homes capable of being accommodated on Sandleford Park site and hence the traffic volumes generated and the design of access points. The drawings in Appendix 1 (attached) clearly illustrate the impacts that varying widths of buffer zones would have on the overall development. Appendix 2

#### **3.B Nature corridors and wildlife studies.**

We believe that in its current form the application fails to conform with West Berkshire Council's newly published Environment Strategy, which proposes (6.2.6) the creation of a Nature Recovery Network, which it describes as "a joined-up system of places important for wild plants and animals" that would allow "plants, animals, seeds, nutrients and water to move around more freely".

We are concerned that the wildlife surveys conducted at Sandleford are neither up to date nor exhaustive. For example, conservation organisations such as the Berkshire Badger Group do not appear to have been consulted. We also have doubts as to whether it has been possible for thorough ecological surveys of the private areas of the site, some of which appear to have been given over to shooting, to be undertaken.

#### **3.C Environment and Sustainability**

There is insufficient attention to sustainability in the development as proposed. For instance, the houses should be aligned so as to maximise the benefits of solar energy. Simple things like the alignment of roofs to benefit say solar energy have a direct effect on what would be the proposed layout of roads and therefore traffic flows on and off site. It is imperative that this information is provided at the outline planning permission stage in order to fully assess any planning application. As submitted, this application does not come close to the requirements of West Berkshire's Environment Strategy, or current solar energy and sustainable provisions, as required following the climate emergency declarations of all councils in this area.

**If the Planning Authority is minded to approve the application and grant permission for the proposed development, they should attach conditions to include the following:**

1. The main access road must be a light-controlled junction and not a roundabout. Bus lanes should be considered at the light-controlled junction onto Monks Lane and other junctions with bus egress with preferential egress from the estate given to buses before car movements are allowed. This could be controlled by sensors on the lights and transmitters on the buses.
2. All cycling and walking infrastructure must be planned and designed in accordance with LTN1/20 and the emerging LCWIP
3. The double roundabout at the A343 / Monks Lane junction must provide safe pedestrian & cycle crossings from A343 (E side) both north and south of Monks Lane, preferably light controlled and if necessary, by taking up land occupied now by The Bell pub.
4. All construction traffic for the whole Sandleford Park site must use the new A339 junction, which is due to be available by early 2022. Reason, to avoid construction traffic accessing the site from Monks Lane
5. The local centre must be delivered much earlier in the build-out, ideally before 500 homes are occupied.
6. The developer should consider provision of ponds or other wetland areas to attract wildlife and form an attractive element of site landscaping. The proposed valley crossing could form part of the landscaping for such a feature provided there was no adverse impact on the damp grassland in the valley
7. The planning authority should insist that the developers comply fully with all aspects of their affordable housing provisions as set out in West Berkshire Council's Planning Obligations SPD December 2014 in every respect.

Yours sincerely,

Lisa Blake  
Clerk to Greenham Parish Council