

Town and Country Planning Act 1990

Appeal under Section 78(1)(a) by Bloor Homes and Sandleford Farm Partnership

Sandleford Park, Newbury

APP/W0340/W/20/3265460

LPA Reference: 20/01238/OUTMAJ

Wheatcroft Consultation

Contents

Appellants' Statement 3

Appendix 1: Sample Letter to Residents, Organisations and Consultees 5

Appendix 2: Site Notice and Locations 12

Appendix 3: Comments received from Consultees16

Appendix 4: Comments received from Residents and Organisations51

Appendix 5: Additional comments received from Consultees59

Appellants' Statement

1. The Appellants, Bloor Homes and Sandlesford Farm Partnership have consulted on a number of documents that it wishes to be considered as part of the Appeal.
2. On the 25th September 2020, prior to the Application being refused, the then applicants submitted a response to comments on the Application that had been received from certain consultees. This included visibility splays for the Monks Lane accesses, a revision to the Flood Risk Assessment, an Air Quality Assessment relating to Special Areas of Conservation and information in response to questions Hampshire County Council's regarding highway matters. The LPA did not accept or consult on this material at that time. This material was then submitted as part of the Appellants' documentation
3. In submitting the Appeal on the 17th December 2020, the Appellants included with its Statement of Case two appendices, one entitled Valley Crossing Study and one a drawing showing an alternative playing field scheme for the expansion of Park House School. At this time, the Appellants also provided an amended Arboricultural Impact Assessment. This new information was prepared in response to some of the LPA's reasons for refusal and submitted as part of the Appeal.
4. The Appellants consulted on this material after the Appeal was submitted in accordance with the Wheatcroft Principles.
5. Information to enable this consultation was provided to the Appellants by the LPA and letters were sent to the following on the 1st February 2021:
 - Persons or organisations who had commented on the application
 - Statutory Consultees
6. Example letters are included at *Appendix 1*.
7. In addition, Site Notices were erected by the Appellants. A copy of the notice as well as the locations it was erected is at *Appendix 2*.
8. The consultation material was available to view both via the Appellants website (lrmplanning.com) and the Council's own webpage relating to this application.
9. Comments were invited by the 22nd February 2021.
10. As at the 1st March 2021, responses from the following consultees have been responded:

Ministry of Defence
Binfield Badger Group
Dr Tony Vickers
Liz Lake Associates on behalf of West Berkshire Council
West Berkshire Council – education, drainage, planning policy, tree officer
Woodland Trust
Berkshire Garden Trust

11. These comments are at *Appendix 3*.
12. In addition, the comments from local residents are attached at *Appendix 4*.
13. Following the end of the consultation period there were additional responses from consultees.
The list of all responses received is as follows:

Liz Lake Associated on behalf of West Berkshire Council for Ecology
Liz Lake Associated on behalf of West Berkshire Council for Landscape
Lead Local Flood Authority
Planning Policy
Tree Officer
Sport England
Education Services
Highways for West Berkshire Council

14. These comments are at *Appendix 5*.

Appendix 1: Sample Letter to Residents, Organisations and Consultees



01 February 2021

Our Ref: OJ/16.159

[REDACTED]
[REDACTED]

Dear Sir/Madam

**Sandleford Park
Section 78 Appeal – Wheatcroft Consultation
APP/W0340/W/20/3265460**

I am writing on behalf of Bloor Homes and Sandleford Farm Partnership (the Appellants) who have lodged an appeal (the Appeal) against the decision of West Berkshire Council (the LPA) to refuse planning application 20/1238/OUTMAJ (the Application) on the 13^h October 2020.

On the 25^h September 2020, prior to the Application being refused, the then applicants submitted a response to comments on the Application that had been received from certain consultees. This included visibility plays for the Monks Lane accesses, a revision to the Flood Risk Assessment, an Air Quality Assessment relating to Special Areas of Conservation and information in response to questions Hampshire County Council's regarding highway matters. The LPA did not accept or consult on this material at that time. This material has now been submitted as part of the Appellants' documentation.

In submitting the Appeal on the 17^h December 2020, the Appellants included with its Statement of Case two appendices, one entitled Valley Crossing Study and one a drawing showing an alternative playing field scheme for the expansion of Park House School. At this time the Appellants also provided an amended Arboricultural Impact Assessment. This new information was prepared in response to some of the LPA's reasons for refusal and submitted as part of the Appeal.

The above-mentioned material can be viewed at the following link:

[Wheatcroft Consultation Documents](#)

Should you wish to make any comments in relation to this material which the Appellant will ask the Inspector to consider as part of the Appeal, please do so in writing by the **22nd February 2021** either to the address below or alternatively by email to [REDACTED] with the reference "Sandleford Park". Copies of any response will be shared with the Planning Inspectorate, the LPA and Hampshire County Council as part of the Appeal process.

Should you have any queries, please do not hesitate to contact me on either [REDACTED] or via email [REDACTED]

Your faithfully,

[Redacted]

[Redacted]

Director

1st February 2021

Development and Planning Service

West Berkshire District Council
Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: 20/01238/OUTMAJ

Your Ref:

Please ask for: The Planning Appeals Team

Tel: Call Centre: 01635 519111

Fax: 01635 519408

e-mail: Appeals@westberks.gov.uk

Dear Sir/Madam

**TOWN AND COUNTRY PLANNING ACT 1990
APPEAL UNDER SECTION 78**

Site Address:

Sandleford Park
Newtown Road
Newtown
Newbury

Description of development:

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.

Application reference:

20/01238/OUTMAJ

Appellant's name:

Bloor Homes and Sandleford Farm Partnership

Appeal reference:

APP/W0340/W/20/3265460

Appeal start date:

20th January 2021

I refer to the above details. An appeal has been made to the Secretary of State against the decision of West Berkshire District Council to refuse to grant planning permission.

As part of the appellants' appeal submissions they have provided amended and additional information upon that which was considered and consulted on at the application stage by the Council. The additional and amended information can be viewed on the Council's website at <http://planning.westberks.gov.uk/rpp/index.asp?caseref=20/01238/OUTMAJ> or via the link provided in the attached letter from the appellants.

As a result of the submission of amended and additional information, the appellants are required to undertake further consultation with all interested parties, including those who previously submitted representations in respect of planning application 20/01238/OUTMAJ. In order to facilitate that process, whilst ensuring that any personal data submitted with your original representation (names, email/postal addresses) is not disclosed to the appellants, the Council is sending you the attached letter on behalf of the appellants.

Please note, any comments you wish to make in relation to the additional and amended information submitted by the appellant as part of their appeal must be submitted in writing to the appellants (not the Council) to the addresses provided in the attached letter by the 22nd February 2021.

As detailed in the attached letter, copies of any response you submit to the appellants will be shared with the Planning Inspectorate, West Berkshire Council and Hampshire County Council as part of the appeal process, in accordance with the appellants' Privacy Notice which is available to view on their website at <https://lrmpplanning.com/privacy/>.

Yours faithfully,

The Planning Appeals Team



29 January 2021

Our Ref: OJ/16.159

Dear Sir/Madam

**Sandleford Park
Section 78 Appeal – Wheatcroft Consultation
APP/W0340/W/20/3265460**

I am writing on behalf of Bloor Homes and Sandleford Farm Partnership (the Appellants) who have lodged an appeal (the Appeal) against the decision of West Berkshire Council (the LPA) to refuse planning application 20/01238/OUTMAJ (the Application) on the 13th October 2020. You previously submitted comments in relation to this application. This letter is being distributed by West Berkshire Council on our behalf to ensure your personal data is not divulged in accordance with GDPR provisions.

On the 25th September 2020, prior to the Application being refused, the then applicants submitted a response to comments on the Application that had been received from certain consultees. This included visibility splays for the Monks Lane accesses, a revision to the Flood Risk Assessment, an Air Quality Assessment relating to Special Areas of Conservation and information in response to questions Hampshire County Council's regarding highway matters. The LPA did not accept or consult on this material at that time. This material has now been submitted as part of the Appellants' documentation.

In submitting the Appeal on the 17th December 2020, the Appellants included with its Statement of Case two appendices, one entitled Valley Crossing Study and one a dragging showing an alternative playing field scheme for the expansion of Park House School. At this

time, the Appellants also provided an amended Aborigicultural Impact Assessment. This new information was prepared in response to some of the LPA's reasons for refusal and submitted as part of the Appeal.

The above-mentioned material can be viewed at the following link:

https://lmaplanninglimited-my.sharepoint.com/:f/g/personal/katecoventry_lrmplanning_com/Ep-6Cso-KxZKoWZ1ttXoFEMBg5WgApcmcISvsNTkXFUqEg?e=IDhkrT

Should you wish to make any comments in relation to this material, which the Appellants will ask the Inspector to consider as part of the Appeal, please do so in writing by the **22nd February 2021** either to the address below or alternatively by email to [REDACTED] with the reference "Sandleford Park". Copies of any response will be shared with the Planning Inspectorate, the LPA and Hampshire County Council as part of the Appeal process in accordance with our statement/policy on personal data which is available on our website at <https://lrmplanning.com/privacy/>,

Should you have any queries, please do not hesitate to contact me on either [REDACTED] or via email [REDACTED]

Yours faithfully

[REDACTED]
Director

Appendix 2: Site Notice and Locations

Town and Country Planning Act 1990

PUBLICITY AND CONSULTATION

Bloor Homes and Sandlesford Farm Partnership have appealed against the decision of West Berkshire Council to refuse planning application **20/01238/OUTMAJ**.

The Planning Inspectorates reference for this appeal is **APP/W0340/W/20/3265460**.

In submitting its appeal, information was provided that had not been consulted upon as part of the planning application. This information is comprised of the following:

- Arboricultural Assessment;
- Valley Crossing Study and an alternative scheme for Park House School playing field (as part of the Statement of Case); and
- Responses to Consultee Comments (25th September 2020).

This information can be viewed online at:

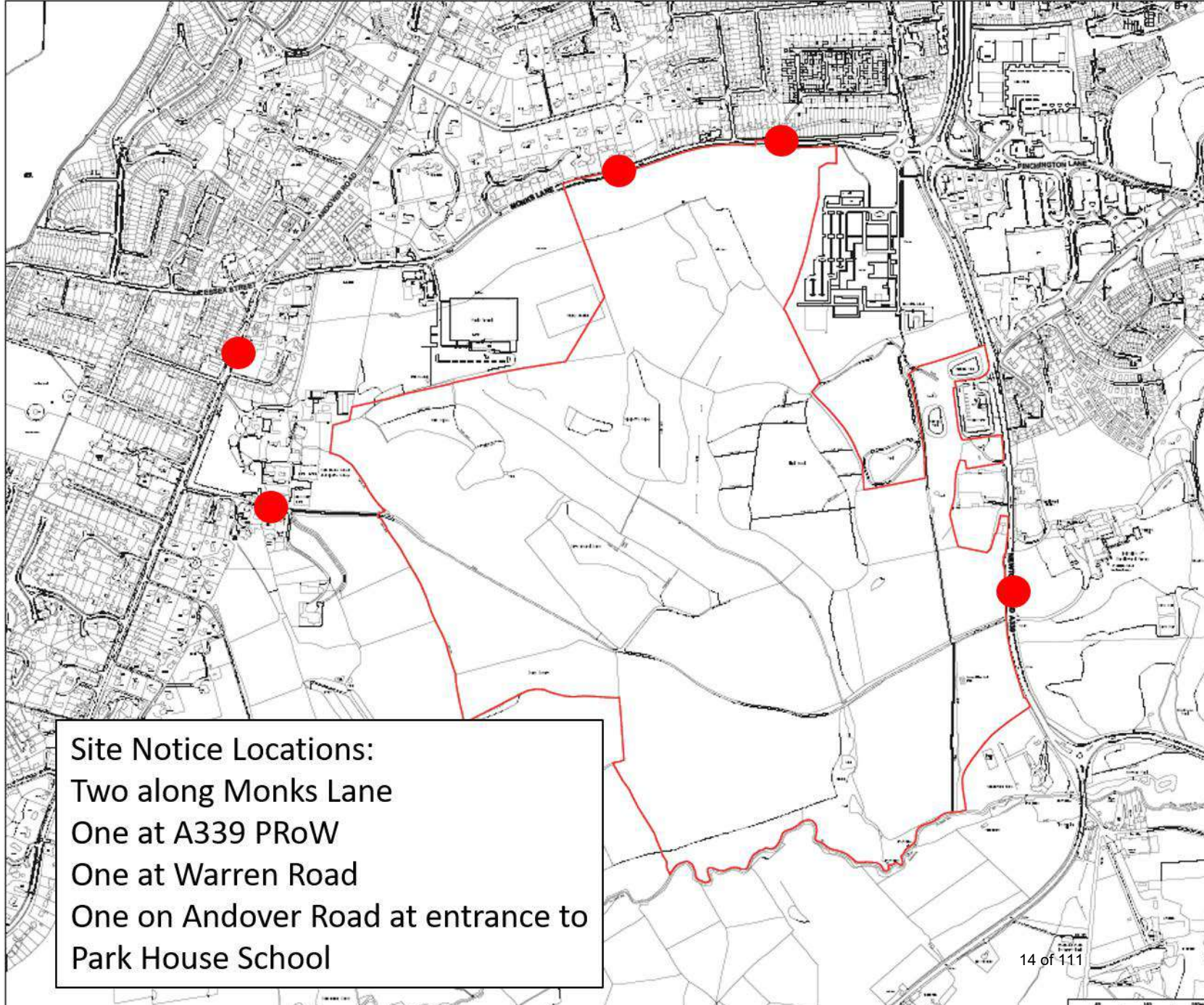
<https://lrmp planning.com/consultation/sandlesford-park/>

Anyone who wishes to make representations about this proposed development and subsequent appeal can write to the Appellant at:

Email: [REDACTED]

Address: LRM Planning, 22 Cathedral Road, Cardiff, CF11 9LJ

All responses must be received by: 22nd February 2021



Site Notice Locations:
Two along Monks Lane
One at A339 PRoW
One at Warren Road
One on Andover Road at entrance to
Park House School



**Town and Country Planning Act 1990
PUBLICITY AND CONSULTATION**

Black Horse and Sarsfield Farm Partnerships have agreed against the decision of Woking Borough Council to refuse planning application 20/0228/OUTMAJ.

The Planning Inspectorate refer to this appeal as APP/W2340/W/25/201546.

In submitting its appeal, information was provided that had not been considered as part of the planning application. This information is comprised of the following:

- Archeological Assessment:**
 - Valley Crossing Study and an information scheme for Park House School (Phase 1) for part of the Statement of Case and Responses to Committee Comments (25th September 2023).

This information can be viewed online at:
<https://www.planninginspectorate.com/consultations/default.aspx>

Anyone who wishes to make representations about this proposed development and subsequent appeal can write to the Appealant at:
 Email: info@blackhorse.com
 Address: LPA Planning, 23 Cathedral Road, Camthorpe, CP11 1LJ

All responses must be received by: 22nd February 2024

**Town and Country Planning Act 1990
PUBLICITY AND CONSULTATION**

Black Horse and Sarsfield Farm Partnerships have agreed against the decision of Woking Borough Council to refuse planning application 20/0228/OUTMAJ.

The Planning Inspectorate refer to this appeal as APP/W2340/W/25/201546.

In submitting its appeal, information was provided that had not been considered as part of the planning application. This information is comprised of the following:

- Archeological Assessment:**
 - Valley Crossing Study and an information scheme for Park House School (Phase 1) for part of the Statement of Case and Responses to Committee Comments (25th September 2023).

This information can be viewed online at:
<https://www.planninginspectorate.com/consultations/default.aspx>

Anyone who wishes to make representations about this proposed development and subsequent appeal can write to the Appealant at:
 Email: info@blackhorse.com
 Address: LPA Planning, 23 Cathedral Road, Camthorpe, CP11 1LJ

All responses must be received by: 22nd February 2024

**Town and Country Planning Act 1990
PUBLICITY AND CONSULTATION**

Black Horse and Sarsfield Farm Partnerships have agreed against the decision of Woking Borough Council to refuse planning application 20/0228/OUTMAJ.

The Planning Inspectorate refer to this appeal as APP/W2340/W/25/201546.

In submitting its appeal, information was provided that had not been considered as part of the planning application. This information is comprised of the following:

- Archeological Assessment:**
 - Valley Crossing Study and an information scheme for Park House School (Phase 1) for part of the Statement of Case and Responses to Committee Comments (25th September 2023).

This information can be viewed online at:
<https://www.planninginspectorate.com/consultations/default.aspx>

Anyone who wishes to make representations about this proposed development and subsequent appeal can write to the Appealant at:
 Email: info@blackhorse.com
 Address: LPA Planning, 23 Cathedral Road, Camthorpe, CP11 1LJ

All responses must be received by: 22nd February 2024

**Town and Country Planning Act 1990
PUBLICITY AND CONSULTATION**

Black Horse and Sarsfield Farm Partnerships have agreed against the decision of Woking Borough Council to refuse planning application 20/0228/OUTMAJ.

The Planning Inspectorate refer to this appeal as APP/W2340/W/25/201546.

In submitting its appeal, information was provided that had not been considered as part of the planning application. This information is comprised of the following:

- Archeological Assessment:**
 - Valley Crossing Study and an information scheme for Park House School (Phase 1) for part of the Statement of Case and Responses to Committee Comments (25th September 2023).

This information can be viewed online at:
<https://www.planninginspectorate.com/consultations/default.aspx>

Anyone who wishes to make representations about this proposed development and subsequent appeal can write to the Appealant at:
 Email: info@blackhorse.com
 Address: LPA Planning, 23 Cathedral Road, Camthorpe, CP11 1LJ

All responses must be received by: 22nd February 2024

Monks Lane east

Route 2 towards Powdray from centre (Quintary Wharf)
 via Monks Lane, Eaves Street, Wash Common (near) (Quintary Avenue)
 Valley Road, Eaves Road, Pound Street and Market Street

Monday to Friday (except Public Holidays)

The scheduled bus route will be as follows: 08:00 - 18:00 - 18:30 - 19:00

It should be both - autumn days - Saturdays at Quintary Avenue, Holywell Close

Appendix 3: Comments received from Consultees



██████████
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Submitted by email to ██████████

17 February 2021

Dear Ms ██████████,

Sandleford Park, Newtown Road, Newtown, Newbury

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

Application reference: 20/01238/OUTMAJ

Appeal reference: APP/W0340/W/20/3265460

The Berkshire Gardens Trust, as an interested party, would like to make the following submissions with regard to the above appeal which lies within the setting of Historic England's Grade II Registered Park and Garden at Sandleford Priory and the Grade I Sandleford Priory itself.

The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting sites listed by Historic England (HE) on their Register of Parks and Gardens was consulted during the application process. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.

One of the key activities of the Berkshire Gardens Trust (BGT) is to help conserve, protect and enhance designed landscapes within Berkshire. BGT commented on the current application 20/01238/OUTMAJ and the outline application for the adjoining Sandleford Park West application no.18/00828/OUTMAJ which together form the Site Allocation.

The appeal site forms the wider historic estate to the Grade II Registered Park and Garden at Sandleford Priory and the Grade I Listed house. The importance of the wider setting to these heritage assets has been recognised by both the Council and the appellant for some considerable time which has led to requirements in the SPD and detailed studies by the appellant's consultants into the historic interest and value of the wider estate.

We have noted that there are no grounds for refusal on the basis of harm to the historic environment within the Council's Reasons for Refusal. We have also looked at the Wheatcroft Consultation Documents. However we wish to support Reasons for Refusal 2, 3, and 6i) and ii). Each of these refer to either landscape assets of value within the wider estate of Sandleford Priory or to proposed features of the development which would result in harm to these landscape assets. This landscape includes national historical features both of historical significance and of local importance. The importance of the historic aspects on and adjacent to the site is acknowledged by the appellant in a number of supporting documents.

The value of a landscape or of its features includes its historic provenance. Certain aspects of this development remain to be resolved to ensure that no unnecessary harm arises to the historic environment in its important role in contributing to the value of this landscape in accordance with the Sandleford Park DPD. In this respect the Council's landscape advisor refers to the 2019 West Berkshire Landscape Character Assessment and the principal relevant character area: WH2: Greenham Woodland and Heathland Mosaic.

WH2: Greenham Woodland and Heathland Mosaic: This document refers to five Valued Features of which two refer to historic asset (my underlining):

2) Scenic and open views from the plateau: Sandleford Priory provides important open views southwards towards Penwood and Newtown. Greenham Common provides views over the valleys to the north and south.

3) Heritage and cultural associations: The presence of the airbase and Ministry of Defence land at Greenham Common has had a significant impact in the 20th and 21st centuries. Although many of the buildings are non-traditional and utilitarian, they are evidence of the important phase of our culture and international relations, represented by the designation of surviving structures (Scheduled Monument and Listed Buildings). Sandleford Priory and parkland are also important parts of the historic environment in this area, evidence of time-depth beyond the military intervention.

The Landscape Strategy goes on (my underlining):

2) Retain and enhance open views: The open views experienced from Sandleford Priory and Park and Cookham Common should be considered in all land management, which may include development outside of the District.

7) Conserve the strong time-depth experienced in the landscape: Conserve the setting and integrity of heritage features in the landscape, which provide a sense of time-depth and evidence of past land use in the area. In particular, seek ways to restore the Grade II Registered Park and Garden at Sandleford Priory, which is on the Heritage at Risk Register, and maintain the historic interest of the military interventions at Greenham Common.

Aspects of the historic landscape are at risk of being compromised resulting in harm to the historic physical and visual setting of the Registered Park and Grade I listed building. As described below some of these issues have been resolved but we still have concerns about the impacts of a number of transport proposals. These are issues that have been raised consistently over time and could be resolved. The recent consultation responses to the Council, in particular those from Liz Lake Associates on landscape matters, has also drawn to our attention the further impacts of the cycle way proposals and emergency access arrangements.

For the most part the proposed development has been adapted to avoid harm to some key historic assets which include:

- The immediate setting of the Registered Park and Grade I listed building east of Newtown Road through the design of the County Park and retention of most of the historic woodland, veteran tree cover and historic routeways; and

- The immediate setting of the Registered Kitchen Garden west of Newtown Road by omission of the tennis courts and screen planting to the immediate west of the kitchen garden, and the new proposals for grass and tree planting as shown on the masterplan.

Warren Road (Reason for Refusal 2)

We have raised concerns about the adverse impacts of various highway proposals for the access off Andover Road into the Strategic Site. The route is lined with mature trees along Warren Road and then along the footpath leading south-east to Sandleford Priory. This is an historic 19th C routeway which replaced an earlier route linking Sandleford Priory, through the estate land, to Andover Road.

Further information has recently been provided by Donnington Homes for application no. 18/00828/OUTMAJ on the history of the routeway, following a review of the information provided, with which now we agree. A revised highway scheme was also submitted which we also accept, subject to details (see Appendix B). It is important that the appellant adopts this approach to the access from Andover Road and that no other arrangements compromise the long term historic and landscape value of the tree lined routeway.

Cycle route and emergency access through the Country Park (Reason for Refusal 3 and 6ii)

Our attention has been drawn to the changes as a result of the new cycle routes and emergency access arrangements since we last commented in July and August 2020. Vector dwg 172985/A/15 shows the proposals with a 4m wide paved cycle way beyond a 1m wide grass strip to the side of the existing footpath, including a 1m wide and grasscrete strip to provide emergency access. At one point this 4m wide routeway diverges from the footpath. These changes will severely impact on the original surviving estate 18th C routeway linking Sandleford Priory with Andover Road, which is recorded on John Roque Map 1761, and will have an adverse impact on views from the Grade I listed Priory and Registered Park. The existing footpath is quite wide at this point and could be widened to accommodate a cycle route and surfaced without creating a very wide urbanised double track across this rural landscape. So much has already been done by the Council in consultation with the appellant to conserve the character of this landscape whilst delivering the Country Park. This would be wholly compromised by the proposed surfaced path, cycleway/emergency access. The central grass strip is unlikely to survive and will probably require surfacing too.

The cycle route/emergency access proposal is urbanising and out of keeping with the character and appearance of this historic landscape and routeway and contrary to the objectives for the Country Park. This scheme would have a severe impact on the historic landscape value of the valley contrary to NPPF guidance paras 8c), 127, 170, and 197, Local Plan policy CS19 and the terms of the Sandleford Park SPD.

Link road across the central valley (Reason for Refusal 2 and 6i)

We have consistently raised concerns about this crossing, firstly when no details were provided by the appellant and secondly on submission of the current scheme. Vector dwg. No. VD17562-SK01 shows the proposed valley crossing. We have considerable concerns about this very poor design solution within an integral part of the historic landscape, in addition to those raised by the Council on landscape, ecological and arboricultural grounds.

The sensitivity of the central valley landscape is acknowledged in the ES Chapter 9 Cultural Heritage. This document in Table 9.4 states that there would be moderate adverse harm to the central valley on the basis that '*Retention of woodland and avoidance of built development in central valley and between Crook's Copse and High Wood*' (my underlining). The Chapter 9 does not assess the effect of the proposed valley crossing. The sensitivity of the central valley is also noted in Chapter 7 Landscape and Visual. Landscape Effects Table G6 in summary states that '*The new road across the central valley will be designed to respect its character and landform, and minimise severance*' and concludes that there would be a minor to substantial adverse impact if that is the case.

The proposed valley crossing has not been assessed and is contrary to both the Council's and the appellant's landscape and heritage experts' evidence. The proposed crossing is a massive structure which will completely block the valley and

dominate the valley landscape, severing this historic valley feature and the historic inter-relationship between the woodlands and fields to the north and south. This scheme would have a severe impact on the historic landscape value of the valley contrary to NPPF guidance paras 8c), 127, 170, and 197, Local Plan policy CS19 and the terms of the Sandford Park SPD.

The Appellant's Statement of Case includes some alternative options but does not select one as a preferred option or substitute that option. We do not believe that such a key design feature in a very sensitive landscape should be dealt with under reserved matters. Not least because neither Berkshire Gardens Trust nor the Gardens Trust would normally be consulted on reserved matters. The proposed crossing is a major structure in its own right, the impacts of any options should be considered in full and consulted on as part of the application and appeal process.

Conclusions

The above development proposals are contrary to NPPF, Local Plan Policy and the SPD and fail to conserve or enhance the setting of assets of the acknowledged high significance and the local historic value of the wide estate. The Berkshire Gardens Trust respectfully requests that the Inspector dismisses the appeal.

Yours sincerely,

[Redacted signature]

[Redacted name]

BGT Chair and Planning Advisor.

cc: The Gardens Trust

Appendices:

Appendix A: Comments from Berkshire Gardens Trust Sandford Park 20/01238/OUTMAJ July and August 2020

Appendix B: Comments from Berkshire Gardens Trust Sandford Park West 18/00828/OUTMAJ November and December 2020

APPENDIX A



██████████
Case Officer
West Berkshire Council
By email from BGT

22 July 2020

Dear Sir/Madam,

20/01238/OUTMAJ Sandleford Park, Newtown Road, Newtown, Newbury

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; and new open space including the laying out of a new country park.

Comments from Berkshire Gardens Trust

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed Council strategies affecting sites listed by Historic England (HE) on their Register of Parks and Gardens. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.¹

One of the key activities of the Berkshire Gardens Trust (BGT) is therefore to help conserve, protect and enhance designed landscapes within West Berkshire. We are therefore grateful for the opportunity to comment on the most recent planning application for Sandleford Park.

With the high volume of documents, and numerous changes to these over the years, we have tried to identify the changes arising, following on from your refusal of the application in 2018. However it may be that we have missed information which would have helped us to understand how this scheme varies from the former, and whether our queries and objections have been addressed.

I am aware that we are a bit late in sending in our response and hope that that it can still be considered. For ease of reference I have summarised our latest position below.

¹ The Gardens Trust, a national body recently published a guidance leaflet to explain the place of historic designed landscapes in the planning system, the importance of assessing significance, the statutory consultation obligations, and the role of County Gardens Trusts, in raising awareness of historic designed landscapes as heritage assets. 'The Planning System in England and the Protection of Historic Parks and Gardens' can be downloaded at www.thegardenstrust.org. BGT's own website: www.berkshiregardenstrust.org

1. We are pleased to see the omission of the tennis courts and screen planting to the immediate west of the kitchen garden, forming part of the Sandleford Priory Registered Park and Garden, and the new proposals for grass and tree planting as shown on the masterplan;
2. We are also pleased to see that there have been no changes to the housing layout or adjacent the NEAP within the sightline of Sandleford Priory. These proposals were the result of earlier detailed discussions to ensure that the impact on the views from Sandleford Priory were minimised; and only very temporary whilst the proposed tree cover established to the south of the housing and NEAP. We were happy that the photomontages show that this could be achieved. We are pleased to see that the design of the NEAP with natural materials will ensure that there will be no adverse visual impact on views from the Priory;
3. We have raised considerable concerns about the impact on the trees along the path leading off Warren Road. We note that some buildings and playing fields are now shown south of the tree avenue but it is not clear whether these important trees are all to be retained (I could not find a plan illustrating the trees to be retained/felled). It is also important that the alignment of the historic path still runs between these trees to avoid damaging the historic context of this route. The masterplan does not make this clear but it does show a path north of the playing fields with no trees along its southern edge. The position here needs to be clarified and the avenue and historic alignment retained;
4. Finally, and most importantly, we have consistently raised concerns about the design of the valley crossing. The landscape and historic documents still maintain that this is a reserved matter. However, Appendix F of the Transport Assessment includes an indicative but clear idea of what is intended. This shows a wide highway of 2 x 3m carriageways; 2 x 2m footways; 2 x 3m cycle ways; a central reservation up to 4m wide and land taken to provide the side slopes of 1.33m each side – a total of 15.66 to 19.66m wide. Most of the crossing would now be on an embankment with a short bridge section. This would result in a wholly inappropriate structure of no aesthetic merit, effectively blocking this valley. It would be out of keeping with the historic landscape character of the valley and detract from the objectives of the Country Park in landscape and heritage terms. We appreciate that a crossing may be needed to serve the western part of the development but a well designed elegant bridge would result in far less harm.

Conclusion

BGT therefore objects to the current proposals as they stand and requests that the valley crossing indicative proposals are substantially revised to ensure that the historic landscape character of the valley is protected. We also request that further information on the impact(s) on the path access and trees off Warren Road is provided and reassurance given that the path and tree line will be retained.

Yours sincerely,

[REDACTED]

[REDACTED]

BGT Chair.

cc: The Gardens Trust



[Redacted]

Case Officer
West Berkshire Council
By email from BGT

26 August 2020

Dear Sir/Madam,

20/01238/OUTMAJ Sandleford Park, Newtown Road, Newtown, Newbury

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; and new open space including the laying out of a new country park.

Additional comments from Berkshire Gardens Trust

We raised concerns in July 2020 about the design of the valley crossing. At the time we noted that Appendix F of the Transport Assessment shows in cross section a wide highway 17m wide. We omitted to point out that the base of the embankment, using the same cross section, would be up to 42m wide. The resulting width also confirms that this would be a wholly inappropriate structure of no aesthetic merit; would be out of keeping with the historic landscape character of the valley; and would detract from the objectives of the Country Park in landscape and heritage terms.

Yours sincerely,

[Redacted]

[Redacted]

BGT Chair.

cc: The Gardens Trust

APPENDIX B



██████████
Case Officer
West Berkshire Council
By email from BGT

19 November 2020

Dear Sir/Madam,

APPLICATION NUMBER: 18/00828/OUTMAJ SANDLEFORD PARK WEST, NEW WARREN FARM

PROPOSAL: Outline application for up to 500 new homes, including 40% affordable, a 1 form entry primary school with land for its expansion to 2 form entry, replacement and/or expansion land for Park House Academy School, extra care elderly units as part of the affordable housing provision, access from Warren Road and emergency access from Kendrick Road, a recreational facility for families of children with special needs, green infrastructure including children's play areas and informal open space, pedestrian and cycle links through the site, sustainable drainage and other infrastructure. Matters to be considered: Access.

Comments from Berkshire Gardens Trust

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed Council strategies affecting sites listed by Historic England (HE) on their Register of Parks and Gardens. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire.¹

One of the key activities of the Berkshire Gardens Trust (BGT) is therefore to help conserve, protect and enhance designed landscapes within West Berkshire. We are therefore grateful for the opportunity to comment again on the most recent planning application for Sandleford Park.

We have read with interest the new Heritage Statement which accompanies the amended and additional documents for the above. You will recall that we set out two outstanding concerns in our letter dated 15th June 2018 – the effects on Warren Road and the path leading off from it to Sandleford Priory and the visibility of the 3 storey development on the southern edge of the development.

¹ The Gardens Trust, a national body recently published a guidance leaflet to explain the place of historic designed landscapes in the planning system, the importance of assessing significance, the statutory consultation obligations, and the role of County Gardens Trusts, in raising awareness of historic designed landscapes as heritage assets. 'The Planning System in England and the Protection of Historic Parks and Gardens' can be downloaded at www.thegardenstrust.org. BGT's own website: www.berkshiregardenstrust.org

Warren Road approach:

The further research interestingly shows that Warren Road was not the original approach to Sandleford Priory from Andover Road which is shown on the 1761 Rocque Map and went slightly to the north in a curve and followed the lie of an extant line of trees. The historic mapping helps to show that at some point between 1781 and 1882 the alignment was changed but we have not found anything in the current Heritage Statement or previous heritage documents on this site to throw any further light on this. It is most possible that this change was not as a result of Capability Brown's plans or Mrs Montague's implementation after his death but carried out by her successors.

Notwithstanding the lack of historic provenance for this Warren Road route, it remains an important feature of the current landscape dating back to 19th century so we are very pleased to see that the proposals now clearly show that the route alignment, the lines of mature trees and accompanying hedgerows are to be retained along Warren Road and the principal footpath leading off south-eastwards towards Sandleford Priory. The masterplan also shows avenue planting leading into the housing off Warren Road which is welcomed as long as it reflects the species and planting distances of the existing tree lines.

The plan now shows a car park for the school and adjacent pitches which is set back away from the tree line along the footpath. It is important that the car park does not encroach into this tree line and that the landscape treatment to the car park respects the historic landscape character and the species mix of this rural approach to Sandleford Priory from Andover Road.

Visibility of proposed houses:

Unfortunately, we were not able to download the LVIA montages which might have shown whether the school and 3 storey housing west of Gorse Copse would be visible from Sandleford Priory. We do note that there are no proposals to landscape the southern edge of the site in this location. We therefore request that evidence of the visibility is provided as an amendment to SLR16 (as provided in the forerunner to the current Environmental Statement). The 3 storey element on the site perimeter may need to be reconsidered in the light of these findings. In addition, the southern edge between Gorse Copse and Brickkiln Copse should be planted with a mixed tree and hedgerow field boundary to contain the development in this part of the wider pasture/woodlands to the west of the registered Sandleford landscape.

Yours sincerely,

[Redacted signature]

[Redacted name]

BGT Chair.

cc: The Gardens Trust



[Redacted]

Case Officer
West Berkshire Council
By email from BGT

18 December 2020

Dear Sir/Madam,

APPLICATION NUMBER: 18/00828/OUTMAJ SANDLEFORD PARK WEST, NEW WARREN FARM

PROPOSAL: Outline application for up to 500 new homes, including 40% affordable, a 1 form entry primary school with land for its expansion to 2 form entry, replacement and/or expansion land for Park House Academy School, extra care elderly units as part of the affordable housing provision, access from Warren Road and emergency access from Kendrick Road, a recreational facility for families of children with special needs, green infrastructure including children's play areas and informal open space, pedestrian and cycle links through the site, sustainable drainage and other infrastructure. Matters to be considered: Access.

Additional Comments from Berkshire Gardens Trust: Visibility of proposed houses:

Thank you for facilitating access to the photomontages. Appraisal photograph 04 produced by WYG represents an important historic view from Sandleford Priory which to date remains much as it was, undisturbed by modern development. We have sought throughout to conserve the nature of this view and thank West Berkshire for its support in achieving this objective. Based on Appraisal Photograph 04 the proposed housing should be screened by woodland and mature trees but care should remain to retain the unspoilt nature of this historic view which contributes to the aesthetic significance of the Priory. We remain of the view that the southern edge between Gorse Copse and Brickkiln Copse should be planted with a mixed tree and hedgerow field boundary to contain the development and contribute to the long term screening.

Yours sincerely,

[Redacted]

[Redacted]

BGT Chair.

cc: The Gardens Trust

[REDACTED]

From: [REDACTED]
Sent: 27 January 2021 12:43
To: Planapps
Subject: FAO [REDACTED] regarding 20/01238/OUTMAJ appeal
Attachments: wt response 20 01238 outmaj.pdf

This is an **EXTERNAL EMAIL**. STOP. THINK before you **CLICK** links or **OPEN** attachments.

Dear Mr [REDACTED]

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. | Sandleford Park Newtown Road Newtown Newbury

I am contacting you with regard to the application described above. I am aware that an appeal has been submitted in this case and I wanted to reiterate our position with regards to the proposals. Whilst the amendment of the RPAs for veteran trees T31, T33, T128 and T133 to 15x stem diameter is welcome, we still maintain our objection to the proposals due to the proposed felling of T1, T34 and T127 as outlined in our original objection (attached). We still consider this loss unacceptable and in direct contravention of National Planning Policy, as we do not consider this development a 'wholly exceptional reason' for the loss of irreplaceable habitats, in this case veteran and ancient trees. If you require further information with regards to our comments, please let us know. Kind regards

[REDACTED]

Assistant Campaigner

Telephone:
Email: [REDACTED]

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
0330 333 3300
woodlandtrust.org.uk<http://www.woodlandtrust.org.uk/?utm_source=woodlandtrust-email-signature&utm_medium=email>

[Facebook]<<https://www.facebook.com/thewoodlandtrust/>> [Twitter] <<https://twitter.com/woodlandtrust>>
[YouTube] <<https://www.youtube.com/user/woodlandtrust>>

[Woodland Trust]<http://www.woodlandtrust.org.uk/?utm_source=woodlandtrust-email-signature&utm_medium=email>

Stand up for trees<http://www.woodlandtrust.org.uk/?utm_source=woodlandtrust-email-signature&utm_medium=email>

The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review.

Anything in this email which does not relate to the Woodland Trust's official business is neither given nor endorsed by the Woodland Trust. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommend recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law. Thank you.

The Woodland Trust is a charity registered in England (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee.

Registered in England No. 1982873.

Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>

From: [REDACTED]
Sent: 14/09/2020 09:53:21
To: Planapps
Cc: [REDACTED]
Subject: FAO Niko Grigoropoulos - WT additional comments on application 20/01238/OUTMAJ

This is an **EXTERNAL EMAIL. STOP. THINK** before you **CLICK** links or **OPEN** attachments.

Dear Niko,

The Woodland Trust would like to submit additional comment on this application – we hope you are able to take them into consideration as part of your decision.

There are several ancient/veteran oak trees recorded on the Ancient Tree Inventory that are likely to be affected by these proposals in their current form:

- T1: Veteran 150878
- T31: Veteran150883
- T33: Veteran 150884
- T34: Ancient 150885
- T127: Veteran 159632
- T128: Veteran 150908
- T133: Veteran 150906

T1, T34 and T127 are proposed to be felled in order to facilitate the proposals. T31, T33, T128 and T133 have not been provided with an appropriate root protection area as befits their veteran status. Ancient and veteran trees are afforded protection within the National Planning Policy Framework (Paragraph 175c) which states: *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists;”*

Footnote 58, defines exceptional reasons as follows: *“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.”* The proposed development does not meet the criteria for wholly exceptional so should be refused on the grounds it does not comply with national planning policy.

As such, the Trust recommends that the above ancient/veteran trees are retained, and afforded an un-encroached root protection area of 15 times the stem diameter, or 5m beyond the canopy edge (if that's greater) in line with Natural England's Standing Advice.

We hope our comments are of use to you; if you would like to discuss any of the points raised above further please do not hesitate to get in touch.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

The Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL
 0330 333 3300
www.woodlandtrust.org.uk

Cases involving woods and trees under threat can change and evolve during the planning process due to a wide variety of reasons. Where a development involving ancient woods or veteran trees no longer remains a threat due to changing circumstance surrounding said application and based upon professional judgement steered by our conservation research, the Woodland Trust withholds the right to withdraw or amend its objection and review its approach.

The Woodland Trust is not a statutory body. As a charity, we provide all information in good faith, funded by public donations. For more information about this [visit here](#).

Stand up for trees

The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review.

Anything in this email which does not relate to the Woodland Trust's official business is neither given nor endorsed by the Woodland Trust. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommend recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law. Thank you.

The Woodland Trust is a charity registered in England (No. 294344) and in Scotland (No. SC038885).

A non-profit making company limited by guarantee.

Registered in England No. 1982873.

Registered Office: Kempton Way, Grantham, Lincolnshire, NG31 6LL.

<http://www.woodlandtrust.org.uk>

[REDACTED]

From: [REDACTED]
Sent: 02 February 2021 17:45
To: [REDACTED]
Subject: Re: Planning Appeal APP/W0340/W/20/3265460

Dear [REDACTED]
Thank you for your email.
If we have no additional concerns to raise, will our original comments be considered under the appeal?
Kind regards
[REDACTED]

On 1 Feb 2021, at 13:47, [REDACTED] wrote:

Dear Sir/Madam,

I am emailing in regards to the Appeal lodged against the decision of West Berkshire Council to refuse planning application at Sandford Park (ref:20/1238/OUTMAJ) on the 13th October 2020. The enclosed letter sets out the additional material which is to be included in the Wheatcroft Consultation for this appeal as well as a link to access this information.

The deadline for submission of comments is the 22nd February 2021. Should you have any queries, please do not hesitate in contacting either myself or my colleague [REDACTED]

Kind regards,

[REDACTED] Planner
BSc (Hons) MSc MRTPI

[LRM Planning are hiring!](#)

[LRM Planning Covid-19 Statement](#)

[REDACTED]

website: lrmplanning.com
twitter: @lrmplanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ

<image001.gif>

DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or it's substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

<Binfield Badger Group.pdf>

[Redacted]

From: [Redacted]
Sent: 16 February 2021 19:34
To: LRM Planning
Cc: [Redacted]
Subject: Planning Appeal APP/W0340/W/20/3265460 - Sandleford

Attn. [Redacted]

Re your letter of 1st February, I write to confirm that I will be making representation regarding your newly submitted documents under the "Wheatcroft Consultation" at the Inquiry.

However as Owen Jones probably knows, as well as being a member of this Council (the LPA), I am also a member of Newbury Town Council (NTC) and Greenham Parish Council (GPC). I hope you have also sent a letter to those councils as well. I am copying this to their respective lead officers on planning matters and to the Chairs of their planning committees.

The two local councils formed a Joint Sandleford Working Group in July 2018 after the two Sandleford developers first submitted their 'linked' applications and met last week to make recommendations. Cllr Roger Hunneman chairs the SJWG and I therefore copy this to him.

Last night NTC's Planning & Highways Committee resolved to apply for Rule 6 Status at the Inquiry. Mr Zarazel will be acting on this shortly.

GPC's Planning Committee, chaired by my District Ward Member colleague Cllr Adrian Abbs, will meet this Thursday to consider the SJWG's recommendations and is likely to also apply for Rule 6 Status.

I note the large number of changes to your proposals in your amended documents. At this stage I will not make any other comments, as I have not had time to read everything.

[Redacted]
Member for Wash Common Ward
[Redacted]

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[Redacted]

From: [Redacted]
Sent: 27 February 2021 14:14
To: [Redacted]
Subject: RE: Planning Appeal APP/W0340/W/20/3265460 - Sandleford

Dear [Redacted],

The two local councils have been granted Rule 6 Status. However it has not proved possible to submit comments on your Wheatcroft documents in time to meet the 22nd Feb deadline. Unlike the LPA, there is no delegation to councillors or officers to make submissions on behalf of the councils, so formal meetings have to be convened and there was no time to do that.

We are hoping that, with Rule 6 Status, we will be able to include our comments on your Wheatcroft documents in our Statement of Case, which has a deadline of 22nd **March**.

I will be attending the Inspector's Conference Call next Friday.

[Redacted]

Member for Wash Common Ward

[Redacted]

From: [Redacted]
Sent: 17 February 2021 16:33
To: [Redacted]
Subject: RE: Planning Appeal APP/W0340/W/20/3265460 - Sandleford

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear [Redacted],

Thank you for your email, I can confirm we have received it and it will be filed along others as part of the Wheatcroft Consultation. Please do keep in touch regarding the outcome of meeting if you deem this appropriate.

Stay safe.

Kind regards,

[Redacted] Planner
BSc (Hons) MSc MRTPI

[LRM Planning are hiring!](#)

[LRM Planning Covid-19 Statement](#)

t: 02920 349737
m: 07557942631
website: lrmpplanning.com
twitter: @lrmpplanning



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

From: [REDACTED]
Sent: 16 February 2021 19:34
To: [REDACTED]

Subject: Planning Appeal APP/W0340/W/20/3265460 - Sandleford

Attn. [REDACTED]

Re your letter of 1st February, I write to confirm that I will be making representation regarding your newly submitted documents under the "Wheatcroft Consultation" at the Inquiry.

However as Owen Jones probably knows, as well as being a member of this Council (the LPA), I am also a member of Newbury Town Council (NTC) and Greenham Parish Council (GPC). I hope you have also sent a letter to those councils as well. I am copying this to their respective lead officers on planning matters and to the Chairs of their planning committees.

The two local councils formed a Joint Sandleford Working Group in July 2018 after the two Sandleford developers first submitted their 'linked' applications and met last week to make recommendations. Cllr [REDACTED] chairs the SJWG and I therefore copy this to him.

Last night NTC's Planning & Highways Committee resolved to apply for Rule 6 Status at the Inquiry. [REDACTED] will be acting on this shortly.

GPC's Planning Committee, chaired by my District Ward Member colleague Cllr [REDACTED], will meet this Thursday to consider the SJWG's recommendations and is likely to also apply for Rule 6 Status.

I note the large number of changes to your proposals in your amended documents. At this stage I will not make any other comments, as I have not had time to read everything.

[REDACTED]

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[Redacted]

From: [Redacted]
Sent: 22 February 2021 16:34
To: LRM Planning
Subject: Sandford Park Section 78 Appeal - Wheatcroft Consultation - Ecology

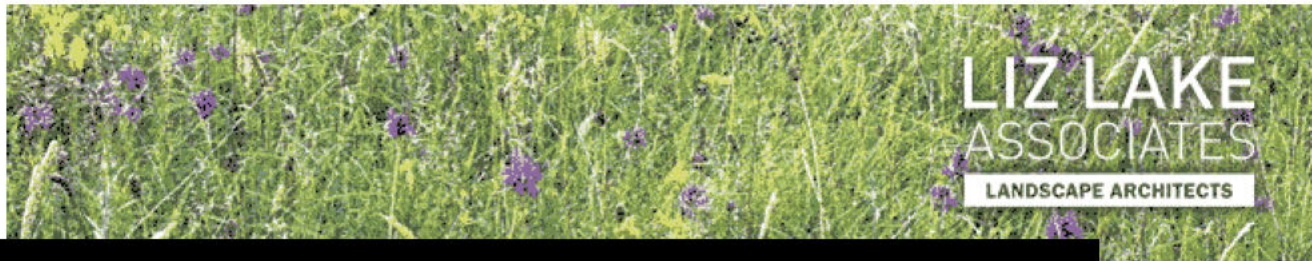
Dear Sir / Madam

I am writing with reference to your letter of 1.2.2021, which made reference to submission of consultation comments, concerning the Wheatcroft Consultation Documents on 22.2.2021. I have recently been retained to represent West Berkshire on Ecological Matters and as there is a need for me to visit the site this week, a fully considered response cannot be provided today. I am therefore writing to advise that I will be submitting a consultation response shortly, once I have managed to visit the site and fully consider the proposals that you have submitted as part of your Appeal.

Yours faithfully

[Redacted]

[Redacted]



[Redacted]

[REDACTED]

From: [REDACTED]
Sent: 22 February 2021 16:22
To: LRM Planning
Subject: Sandford - Wheatcroft consultation notice

Good afternoon,
We will shortly be submitting a consultation response once we have had opportunity to fully consider the proposals submitted as part of the appeal.
Kind regards,

[REDACTED]
**Education Place Planning Team Leader,
Education Service
West Berkshire Council**

[REDACTED]

Please note that I work all day Monday to Thursday and until 2pm on Friday.

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[REDACTED]

From: [REDACTED]
Sent: 22 February 2021 19:14
To: [REDACTED]
Subject: RE: Planning Appeal APP/W0340/W/20/3265460

Dear [REDACTED]

Unfortunately it has not been possible to respond to this matter within the time limit requested. I will send you my response shortly.

Regards

[REDACTED]
Senior Engineer (Land Drainage)
Environment Department West Berkshire Council Market Street Newbury Berkshire RG14 5LD
[REDACTED] | Ext 2066 | [REDACTED]
www.westberks.gov.uk

Please consider the environment before printing this e-mail

From: [REDACTED]
Sent: 01 February 2021 14:30
To: [REDACTED]
Subject: Planning Appeal APP/W0340/W/20/3265460

This is an **EXTERNAL EMAIL. STOP. THINK** before you **CLICK** links or **OPEN** attachments.

Dear Sir/Madam,

I am emailing in regards to the Appeal lodged against the decision of West Berkshire Council to refuse planning application at Sandleford Park (ref:20/1238/OUTMAJ) on the 13th October 2020. The enclosed letter sets out the additional material which is to be included in the Wheatcroft Consultation for this appeal as well as a link to access this information.

The deadline for submission of comments is the 22nd February 2021. Should you have any queries, please do not hesitate in contacting either myself or my colleague [REDACTED]

Kind regards,

[REDACTED] Planner
BSc (Hons) MSc MRTPI

[LRM Planning are hiring!](#)

[LRM Planning Covid-19 Statement](#)

[REDACTED]
website: lrmpanning.com

twitter: @lrmpanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[Redacted]

From: [Redacted]
Sent: 25 February 2021 14:53
To: LRM Planning
Subject: Sandleford

Good afternoon,

We have now had an opportunity to review the Wheatcroft consultation documents. The original proposals included a full size football pitch. This was agreed with the Park House School leadership team (SLT) during the course of the feasibility study discussions.

The latest proposals show a pitch that is much smaller in size and does not seem to accord with either Sports England or the FA guidelines for football pitches.

No explanation for this change has been provided and it is not clear what this sizing of pitch is based on or what it is intended to be used for. Without understanding why this pitch size has been proposed and the thinking behind it, we can only consider it against the standards as above and find it to be undersized. It would therefore not be fit for the intended purpose and would not provide a suitable alternative to the original proposals. If additional information on the pitch size is provided, we would be able to consider this further.

Regards,
[Redacted]

[Redacted]
**Education Place Planning Team Leader,
Education Service
West Berkshire Council**
[Redacted]

Please note that I work all day Monday to Thursday and until 2pm on Friday.

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[Redacted]

From: [Redacted]
Sent: 03 February 2021 15:26
To: [Redacted]
Cc: [Redacted]
Subject: FW: Planning Appeal APP/W0340/W/20/3265460
Attachments: National Planning Case Work Unit.pdf

FAO [Redacted]

Please see the thread of emails below and accompanying attachment regarding an appeal you are the Case Officer for.

I have copied in [Redacted] for more information.

Best Wishes,

[Redacted]
Customer Team Advisor
Customer Services Team

Putting the customer at the heart of everything we do!



[Redacted]

twitter: @PINSgov
web: www.gov.uk/government/organisations/planning-inspectorate

This communication does not constitute legal advice. Please view our Information Charter before sending information to the Planning Inspectorate



Please note that the contents of this email and any attachments are privileged and/or confidential and intended solely for the use of the intended recipient. If you are not the intended recipient of this email and its attachments, you must take no action based upon them, nor must you copy or show them to anyone. Please contact the sender if you believe you have received this email in error and then delete this email from your system.

Recipients should note that e-mail traffic on Planning Inspectorate systems is subject to monitoring, recording and auditing to secure the effective operation of the system and for other lawful purposes. The Planning Inspectorate has

taken steps to keep this e-mail and any attachments free from viruses. It accepts no liability for any loss or damage caused as a result of any virus being passed on. It is the responsibility of the recipient to perform all necessary checks.

The statements expressed in this e-mail are personal and do not necessarily reflect the opinions or policies of the Inspectorate.

DPC:76616c646f72



From: [REDACTED]
Sent: 02 February 2021 09:10
To: [REDACTED]
Subject: FW: Planning Appeal APP/W0340/W/20/3265460

Please see below and attached. My understanding is that requests such as this should be dealt with by PINS in the first instance.

Kind regards,

[REDACTED]
Planning Casework Support Officer

Planning Casework Unit
Ministry of Housing, Communities and Local Government
5 St Philips Place
Birmingham
B3 2PW

From: [REDACTED]
Sent: 01 February 2021 14:18
To: [REDACTED]
Subject: Planning Appeal APP/W0340/W/20/3265460

Dear Sir/Madam,

I am emailing in regards to the Appeal lodged against the decision of West Berkshire Council to refuse planning application at Sandleford Park (ref:20/1238/OUTMAJ) on the 13th October 2020. The enclosed letter sets out the additional material which is to be included in the Wheatcroft Consultation for this appeal as well as a link to access this information.

The deadline for submission of comments is the 22nd February 2021. Should you have any queries, please do not hesitate in contacting either myself or my colleague [REDACTED].

Kind regards,

[REDACTED] Planner
BSc (Hons) MSc MRTPI

[LRM Planning are hiring!](#)

[LRM Planning Covid-19 Statement](#)



website: lrmplanning.com

twitter: [@lrmpplanning](https://twitter.com/lrmpplanning)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

[REDACTED]

From:

[REDACTED]
22 February 2021 17:40

To:

LRM Planning

Subject:

Sandleford Park, Newbury, West Berkshire

Dear Sirs,

Please be advised that in response to the 'Wheatcroft' consultation the planning policy team will be submitting comments shortly.

Kind regards

Planning Policy Team
West Berkshire Council

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[REDACTED]

From: [REDACTED] >
Sent: 22 February 2021 11:09
To: LRM Planning
Subject: Sandford Park

Dear Sir/Madam,

Thank you for the letter dated 01/02/2021 reference OJ/16.159 I will be submitting a response to the 'Wheatcroft' consultation shortly, once I have managed to fully consider the proposals submitted as part of the appeal.

Your sincerely,

[REDACTED]
Senior Tree Officer
Environment Department West Berkshire Council Market Street [REDACTED]
[REDACTED]
www.westberks.gov.uk

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[REDACTED]

From: [REDACTED]
Sent: 03 February 2021 08:02
To: [REDACTED]
Subject: 20210203-10038104-Appeal APP/W0340/W/20/3265460
Attachments: 20210128-10038104-MOD response letter.pdf

Good Morning,

Thank you for consulting the MOD on additional material which is to be included in the Wheatcroft Consultation for this appeal, I can confirmed that we have reviewed the documents and that our response attached sent on 28/01/2021 remains extant and we have nothing further to add.

Kindest regards

[REDACTED]

Safeguarding Manager
Estates – Safeguarding

Due to covid-19 I am working from home until further notice.
In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on 07970170934.

**Defence
Infrastructure
Organisation**

Building 49, DIO Sutton Coldfield, Kingston Road, B75 7RL

[REDACTED]

Website: www.gov.uk/dio/ | **Twitter:** @mod_dio

Read DIO's blog: <https://insidedio.blog.gov.uk/>



From: [REDACTED]
Sent: 01 February 2021 14:16
To: DIO-Safeguarding-Statutory (MULTIUSER) [REDACTED]
Subject: Planning Appeal APP/W0340/W/20/3265460

Dear Sir/Madam,

I am emailing in regards to the Appeal lodged against the decision of West Berkshire Council to refuse planning application at Sandford Park (ref:20/1238/OUTMAJ) on the 13th October 2020. The enclosed letter sets out the additional material which is to be included in the Wheatcroft Consultation for this appeal as well as a link to access this information.

The deadline for submission of comments is the 22nd February 2021. Should you have any queries, please do not hesitate in contacting either myself or my colleague [REDACTED]

Kind regards,

[REDACTED] Planner
BSc (Hons) MSc MRTPI

[LRM Planning are hiring!](#)

[LRM Planning Covid-19 Statement](#)

[REDACTED]
[REDACTED] com
twitter: @lrmpanning

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

Appendix 4: Comments received from Residents and Organisations

[REDACTED]

From: [REDACTED] >
Sent: 17 February 2021 21:51
To: LRM Planning
Cc: [REDACTED]
Subject: Sandleford Park
Attachments: Sandleford appeal Feb 2021.docx

Thank you for allowing us the opportunity to comment on the latest documents relating to Sandleford Park. Please find attached our comments. Please can you ensure that these comments are considered as part of the appeals process?
Thank you



Virus-free. www.avast.com

LPR Planning Ltd

Catherine Road

Cardiff

Monks Lane

Newbury

RG14 7HE

Ref Sandleford Park APP/W0340/W20/3265460

17 February, 2021

Dear Sir/Madam

Thank you for your letter Ref OJ/16.159 dated 29 January 2021 and for giving us the opportunity to view the suite of documents related to this application .

We have viewed the documents and assessments and have the following comments:-

The Thames Water sewer impact study indicates that the existing foul network does not have the available capacity to accommodate waste from this proposed development. The hydraulic model used to assess wet weather scenarios predicts network surcharge and flooding to occur. This will be exacerbated with the addition of 440 dwellings from the proposed Sandleford Park West development (not included in this appeal).

The proposed development site is located within the Environment Agency's risk of flooding from surface water and risk of flooding from rivers areas.

The infiltration study conducted by Geo Env, Group included digging 18 trial pits. From the test data it can be seen that 12 of the 18 trial pits showed little or no water permeability. The report concludes that the soils on the proposed site were of low permeability. The site is therefore unsuitable for soak away drainage. One of the recommendations from the flood risk assessment proposes using permeable paving which is clearly contradictory to the infiltration study findings.

The Arboricultural assessment and Method Statement identifies a number of trees and hedges to be felled or removed and concludes that the proposed development would not cause an unacceptable or adverse impact on the long term vitality of the retained trees and therefore character of the area. We disagree. Removal of any trees or hedges will adversely affect the area, resulting in loss of habitat and outlook. In fact, the LRM response to comments from consultees document, September 2020, identifies more trees along Monks Lane that will need to be removed , which are not identified in the Arboricultural report. We are being encouraged to plant trees to act as CO2 sinks, not cut them down!

The Air Quality Assessment concludes that the NOx levels assessed are below the Critical Level (CL). Some predicted concentrations are very close to the CL. If the proposed development from Sandleford Park West was included, the CL would be breached.

The traffic and transportation advice provided by Vectos concludes that the proposed development is unlikely to result in severe impact on the A339 or at the A34/A4640 or A343. It does not mention the impact on Monks Lane. Does the report include the traffic movements from pick up and drop off at the proposed primary school? (A brand new primary school already exists on land to the south of Newbury College). Does the report include the traffic movements from those trying to access the proposed Country Park? The report will not include the impact of traffic from the proposed development at Sandleford Park West. This will impact, as well as impacting on the NOx concentrations and the CL, and to the air quality and to environmental nuisance in an adverse way.

Environmental Nuisance and Pollution Control directs that the council will only permit development proposals where they do not give rise to unacceptable pollution of the environment.

One further point on traffic and transportation, the access and egress roads proposed indicate only 3 points, 2 on Monks Lane and 1 to the east of the proposed development. Looking at the vastness of the proposed development and these access points, it is clear that they are inadequate. The site will, in effect, be a huge cul-de-sac. There are no access points to the west or to the south of the proposed site. Potential residents living in the south of the development will have to travel across the entire development to exit or to gain entry.

These assessments have been prepared using assumptions and predictions. Common sense tells you that if you destroy a green field site by felling trees and removing hedge rows it will adversely impact on wildlife and the local aspect. The introduction of thousands of additional vehicles will have an impact on local roads, introducing congestion which in turn will increase emissions, decrease air quality, increase noise and nuisance levels. Replacing green fields with concrete will have an adverse affect on drainage and will increase the potential for flooding.

It should be noted that for these assessments to be fair and true representations, they should include contributions from the proposed development of Sandleford Park West.

The majority of local people do not want this vast development. We can satisfy our housing needs with existing developments and using brown field sites such as redundant offices and commercial sites with existing infrastructure in place . We can save this beautiful green field site for future generations and not adversely impact on the environment.

Please can you ensure that these comments are taken into consideration as part of the appeals process?

Please confirm receipt of this letter.

Thank you in advance.



[REDACTED]

From: [REDACTED]
Sent: 09 February 2021 10:51
To: LRM Planning
Subject: Reference "Sandleford Park"

Dear Sir or Madam

Sandleford Park, Section 78 Appeal – Wheatcroft Consultation, APP/W0340/W/20/3265460

I object to this development for the following reasons:

- **General planning guidance and policy:**

Initially the applicants said that the Sandleford development would have two access points to Monks Lane and a sustainable link open to buses only along Warren Road. Subsequently Warren road was proposed by the applicants as an access point, together with Garden Close lane as a walking and cycling route (Garden Close lane is owned by the residents, who pay for its tarmac and upkeep). If some of the amendments to the plans were presented at the start of this development, Sandleford may not have been agreed as a strategic housing site, as from the evaluation criteria for development it was only slightly ahead of another site in Newbury.

West Berkshire Council and its consultees have raised a number of concerns about this site, and its lack of acceptability in line with planning policy e.g. concerns were raised by different councils and parishes around the development concerning the lack of a cohesive travel plan and a number of environmental and ecological considerations; Thames Water have questioned the capacity of the existing foul water network to accommodate the potential demands from this development. The applicant has not addressed many of these until the application was completely rejected, previously continuing to make small changes, but never fully what was asked. The different developers were asked to work together to develop the site, in line with West Berkshire's Core strategy, with one plan that covers the whole site, rather than smaller plans that keep adjusting. They did not do this.

The general public have been asked to comment on several iterations of the applications to develop the Sandleford site over 5 years or so, often with small changes to the plans. This has meant that some local people have not understood why these changes keep happening and have stopped responding to consultations on applications.

I am concerned that the applicants are not taking on board a number of issues, and after planning permission is granted, there is poor evidence that they will follow what was asked of them.

- **Highway safety and access** - there are 2 schools, a busy petrol station/ small supermarket, 2 churches and a playgroup near the Warren road entrance to this development. 1,000 new houses would generate additional traffic and increase risk of road traffic injury to children and young people attending local schools, as well as to their parents and carers.
- **Traffic generation:**

- The Andover road is very busy at the start and end of the school day and between 5 and 6pm. This development would add to the traffic from all access roads. Currently there is queuing traffic at these peak times, so a new development will gridlock the local area at these times.
- Further traffic would have a detrimental effect on air quality in this area with the likelihood of exceeding of the UK Air Quality Strategy annual mean nitrogen dioxide objectives, where there is stationary traffic for rush hour periods, particularly at the roundabout where the Andover road, Monks lane and Essex street meet. There is already an Air Quality Management Area at the roundabout junction of the A339, A343 and Greenham Road and this development will add to the pollutants at this roundabout.
- This development will impact on the A34, with the potential to cause a gridlock of local roads around this area.
- **Noise and disturbance** resulting from the additional homes and facilities.
- **Loss of trees** - this site includes ancient woodland, which the National Planning Policy framework suggests should be retained in any development, unless there are exceptional reasons. In the most up to date plans there is proposed felling of several old trees and I do not feel that there are exceptional reasons for this. There are other housing development sites in Newbury, so this ancient woodland does not need to be destroyed or negatively impacted by development.
- **Nature conservation** - this development will have a detrimental impact on wildlife and a diverse natural habitat.

Yours sincerely



[REDACTED]

From: [REDACTED]

Sent: 16 February 2021 12:09

To: LRM Planning

Cc: [REDACTED]

Sandleford Park Appeal [Filed 16 Feb 2021 13:14]

Dear Sir/Madam,

West Berkshire Planning Department have forwarded a letter from yourselves, the Appellants, requesting comments by 22February 2021 with regard to your appeal regarding Sandleford. These comments are supposed to be forwarded to the Planning Inspectorate, the LPA and Hampshire Council. As my views are anti Sandleford I am unsure if these will be put forward. I am sending a copy to the West Berkshire Council so that my comments are at least seen by someone else.

My Comments

In 2012, Newbury had a vision to become a modern town drawing new businesses and tourists with its new upmarket shopping mall, market square and many other shops and restaurants. This was the basis for the Core Strategy which the Appellants feel is still relevant in 2021, regardless that the housing target has been met or the devastation of Covid on the town itself.

In 2012 houses were needed in Newbury and a target of 5000+ houses was hoped for. At that point nothing else had been built. It was presumably at this time that Sandleford land was bought. It is glaringly obvious this land was bought without an iota of serious thought as to the location, utilities required, vehicle access for the thousands of extra vehicles.

The water/sewage solution for Sandleford is never mentioned or detailed. A recent report on water supply for West Berkshire is exceptionally worrying. Thames Water, who supply West Berkshire, have already previously stated that climate changes are already causing water shortages and environmental problems in West Berkshire and will continue in the future. They have already stated that there would only be enough water for 50 houses on the Sandleford land. Many rivers in the UU are drying up and causing environmental problems because of excess use. Sandleford would be a totally unnecessary leech on this supply.

Monks "Lane" should give everyone a clue. Two access roundabouts onto this small narrow lane for thousands of extra vehicles? Traffic jams, pollution and misery for the residents on Monks Lane trying to exit their homes. Traffic cutting through Rupert Road causing more traffic difficulty for residents. No one has even mentioned this. Traffic from these thousands (and I mean thousands) of extra vehicles will all be exiting onto Monks 'Lane' - from schools, nursing home staff/visitors, school pickup/drop offs and all the residents vehicles. The other small access road suggested on Andover Road is laughable without bulldozing many homes.

The Core Strategy is no longer a vision in this new Covid era. It has altered many towns throughout the UK, including Newbury, and although Newbury will hopefully slowly re-emerge, right now in 2021, a new "add on" town is totally unwarranted. The housing target of 5000+ has also already been reached elsewhere in and around town.

The green areas within Newbury consist a small uninteresting park and Greenham Common, a enormous flat horse land. It has a few interesting wildlife and fauna, but is really a multi-square mile dog walking area. There are a couple of small ponds and the old flight tower with an interesting little museum, a lovely coffee shop with an uninviting sitting area. These are the two town greens for the whole of Newbury's residents to enjoy. It would be wonderful if Sandleford could be made into a third exceptional green area for Newbury and its residents to enjoy. A lake, park, forest, nature walks. The Bloor vision without the buildings. I am sure property developing companies win some and lose some and, as unkind as it may sound, I sincerely hope that in this instance it will be a loss. It will be a massive gain for Newbury whilst it rebuilds its proper town post Covid. Even a reservoir would be more sensible.

Regards
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 16 February 2021 22:48
To: LRM Planning
Subject: Sandleford Park

I would like to register my objections to the proposed Sandleford Park development.

The new proposals will increase traffic on Monks Lane to an unacceptable level. It already generates a lot of noise and dust, with school traffic (Park House), gym traffic, Rugby club traffic, nursing home traffic, surgery and pharmacy traffic, as well as access to Pinchington Lane shopping, the A339, recycling centre, Newbury college and the new primary school already built. With having yet another new primary school on the proposed site (in fact two new ones are shown on the plans), with access from Monks Lane to one of them, will lead to unsafe levels of traffic, an increase in noise pollution and air pollution.

Also, there will undoubtedly be massive destruction of flora and fauna in the area, as well as loss of habitation for much wildlife. Loss of this green space will be detrimental to Newbury.

There is really no need for this housing development with all that is already being built in and around the Newbury area.

The fact that most people are working from home and are likely to continue to do so even after the COVID-19 crisis means that people no longer need to live near their office. Should large businesses in the area, eg; Vodafone, not return to in-office working then all those employees may move away from the area as it is gradually being spoiled by more and more housing estates (it is no longer the rural ideal it once was). This will be devastating for the local economy and especially the high street.

Stop the development now. Chipping away over the years (new primary school and access road currently being built, applications to widen roads, etc) all to help with final approval must stop.

Please note my objections when the appeal is considered.
Regards

[REDACTED]

Appendix 5: Additional comments received from Consultees

Application Site: Sandleford Park, Newbury, Berkshire (Wheatcroft Consultation)- Ecology

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. Sandleford 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 ecology consultation takes into account the new/ updated information that has been provided. The Wheatcroft submission includes:

- a 'Response to Comments for Consultees' prepared by LRM planning consultants (for the refused application), Ecology Section 7;
- Appendix 3 of the LRM response document, Air Quality Assessment associated with Special Areas of Conservation requested by Natural England;
- an Amended Arboricultural Impact Assessment, Barrel (9th October 2020) (ref:14281-AA8-CA);
- Statement of Case (LRM 201217) - Paragraphs 6.26-6.30;
- Statement of Case - Appendix 4 'Valley Crossing Study'
- Statement of Case - Appendix 5 'Park House School Playing Field Scheme'.

and other inter-related topics such as highways (section 2), drainage (section 3), arboriculture (section 4) (for example) which have elements that overlap with ecological matters.

LRM 2.4-2.7 and 7.17 and Statement of Case Appendix 4: We welcome the review of options for the Main Valley Crossing as set out at Appendix 4 Valley Crossing Study, which now presents the approach for two other alternative crossings.

Main Valley Crossing

From an ecological perspective the approach represented by the 3rd Option (SK023/ SK003) goes part way to addressing the criteria set out in the SPD CA7 Valley Crossing (pg. 79) as these apply to retention of mature and veteran trees and the open valley ecosystem. However, clarification is required in this respect, as although the table in 3.1 of the Valley Crossing Study, indicates that this 3rd Option allows for the retention of T69, T77 and T78 (unlike the other options which would necessitate removal or significant impact on either T77 or T78), this table then goes on to indicate that T69 will be removed. Uncertainty also surrounds the retention or otherwise of T76 in this 3rd Option. We are of the opinion that T76 will be retained in this option but this is not clear and is not stated. These 4 trees are each fine mature or veteran specimens, of some general habitat value, and with each one identified (ES Ecology Chapter 6, Appendix F7, Bat Roost Assessment of Trees and Bat Hibernation Survey) as trees with bat roost potential (moderate, low or negligible), on account of features capable of supporting roosting bats.

The table in 3.1 of the Valley Crossing Study states '*There is no loss of connectivity with wildlife able to freely pass beneath*'. Whilst this is true for badgers, deer and non-flying small mammals, reptiles, amphibians and many invertebrates, there is potential loss of connectivity and harm to bats, barn owls and other bird species and flying insects etc. that remain to be addressed even with the 3rd Option. Further assessment with respect to patterns of wildlife

activity in the area of the bridge is required and further attention given to species specific mitigation requirements, to prevent unacceptable levels of death or injury to protected and other species of wildlife.

For example, there is potential for bats that may inhabit any of the retained trees mentioned above, or other suitable bat roost trees in the vicinity, including the confirmed bat roost in the nearby T67 (and any bats that may in time occupy the bat boxes to be installed within the 3 woodlands that are close to the proposed valley crossing), to be lost or injured by vehicular impact. There is known bat foraging activity in this area and whilst mitigation measures proposed include planting 'hop-over' trees to a height of 3m+ (ES Ecology Chapter 6, Appendix F9), it is difficult to envisage with any conviction how this would be effective in preventing foraging and commuting bats colliding with vehicles on the long and elevated bridge structure or conversely directing them under the bridge. We estimate the below structure clearance to be up to 4m, although the submitted plans do not enable accurate measure in this respect and we request clarity in this respect.

Whilst it is accepted that low flying species of bats may well fly under the bridge (and this is a benefit compared to the other crossing alternatives in this location), there is still scope for severance effects on bats attempting to cross the route for foraging / commuting purposes to follow the stream and/or access retained marshy grassland foraging grounds to the north and south and being thwarted / confused by the obstruction caused by the bridge structure. Up to 13 species of bats have been recorded on the site, with differing flight patterns, including a significant variation in typical height of flight. This potential severance effect and the reasonable likelihood of death or injury to some bats when attempting to cross the bridge as a result of vehicular collision, is as yet un-assessed.

We welcome the use of low level bollard lighting on the bridge structure as stated in the Lighting Assessment submitted as part of the ES with the application (ES Vol. 3 Appendix F20)but there is residual concern that the combination of even low level lighting along with vehicular illumination may exacerbate potential harmful effects of the bridge. We request more detail concerning pro-active bat mitigation to minimise the potential severance effect and risk of death / injury to bats in these circumstances.

A significant degree of uncertainty remains regarding potential harm to European Protected Species of bats(although this bridge design is favoured in ecological terms compared to the previous proposal / the alternative option).

The marshy grassland habitat that will be crossed by the proposed bridge has also been identified as 'optimal foraging habitat' for barn owls (ES Ecology Chapter 6, Appendix F5). Barn owls tend to fly at low levels, the optimal foraging height being 3m or so above ground vegetation ie more or less the same clearance height as the bridge structure (to be confirmed by the Appellant), therefore whilst it might be expected that owls would fly under the bridge (and this is an advantage over the alternative crossing options), this is not certain in all cases. As for bats, the bridge structure has potential to cause an obstruction to flight paths / foraging patterns, effectively causing severance of barn owl activity and/or vehicular collision and risk of injury / mortality. Further assessment to quantify likely impacts and mitigation measures to ameliorate potential impacts on this Schedule 1 protected species is required.

We agree that the 3rd Option will significantly reduce the loss of marshy grassland and specifically the linear area of purple moor-grass and rush pastures habitat of principle importance (HPI) within the valley and adjacent habitats on the valley sides and this is to be commended. However, the western 'bridge abutment' still encroaches into the valley side and we would suggest that the

possibility of pulling it back further (as it is on the eastern side), is investigated. This would optimise habitat retention by avoiding loss of the hedgerow connecting Barn Copse with Dirty Ground Copse and eliminate unnecessarily narrowing of the valley.

The appraisal provided in the table in 3.1 of the Main Valley Crossing Link text, does not acknowledge the extent and degree of potential ecological harm arising and we consider it appropriate for the ES Chapter 6 Ecology, to be updated to consider the alternative options and compare the likely impacts and opportunities for mitigation.

Crooks Copse Link

The appraisal of the revised scheme for the Crooks Copse link (Dwg. No. VD17562-SK21 B), acknowledges the potential for severing connectivity between Crooks Copse and other woodlands and open space to the south. Notwithstanding that this link was requested by the Council (highways team), to address their concerns regarding the distribution of traffic throughout the whole of the allocated site ecological impacts of the revised scheme remain of ecological concern. It will effectively isolate Crooks Copse (Ancient Woodland) from High Wood Copse and Slocketts Copse and the other areas of Ancient Woodland to the south, which in combination comprise the High Wood Complex Local Wildlife Site (LWS). This potential for habitat fragmentation and ecosystem isolation is likely to cause long term decline in the Ancient Woodland characteristics of Crooks Copse (which is currently one of the most biodiverse of the woodlands on site), including survivability of indicator species and also in terms of wildlife links and genetic deterioration. Both aspects are exacerbated further by the additional encroachment of built form on the valley sides (as highlighted in the landscape response).

The design approach for this valley crossing is very different to that put forward for the Main Valley Crossing, in that an at-grade

solution is proposed, with a small culvert enclosing the stream, as opposed to a bridge. However, the area crossed by the Crooks Copse Crossing is similarly marshy grassland habitat that is recorded as optimal barn owl foraging habitat (albeit mainly to the south of the proposed link) and is also used by foraging bats (albeit this area is at further distance from trees with recorded bat roost potential). There is therefore scope for severance effects / risk of vehicular injury or death to these low flying protected species and this may be exacerbated by the proposed lighting along the southern side of the route.

In regard to practical aspects of link construction in this northern area of the valley the stream is not necessarily well defined and in part (particularly in the winter), extends laterally forming extensive areas of marshy grassland habitat, with shallow pooling and braided channels. We feel that this aspect requires further on-site investigation, as there may be additional need for carriageway embankment and /or drainage, to channel the stream and thus the potential for more extensive habitat loss and/or disturbance than envisaged, that this would entail.

The only active main badger sett recorded at Sandleford Park is located on the north-western tip of High Wood (sett entrances visible from the exterior of the wood), at a distance of approximately 40m to the closest part of the proposed link. Badger surveys undertaken to date do not include activity surveys, which would be useful in determining movement patterns in this area, in order to assess impact and determine specific mitigation requirements to ensure badger welfare. There is current evidence of badger activity in Crooks Copse and its environs and thus a strong likelihood that badgers from the High Wood main sett cross the Crooks Copse link area habitually as part of their territorial area. The proposed inclusion of lateral mammal shelves at the culvert point to encourage safe passage by badgers, is welcome, however, would not in themselves be sufficient to prevent likely death and/or injury to badgers and a subsequent reduction in population

numbers of the nearby badger clan. Badgers currently have free rein over this part of the valley and the peripheral eastern area of grassland and would not necessarily travel to the culvert (some 100m from the sett) in order to cross the road using the proposed mammal shelves to access Crooks Copse and the northern section of valley. In the winter months the shelves may well be flooded, which would prevent use. This concern needs to be addressed through further survey and a more comprehensive strategy of badger protection.

Furthermore, there are concerns that if the badger sett in the NW of High Wood becomes untenable due to anthropogenic disturbance impacts, any new sett location selected by the badger clan may be compromised by wet ground conditions prevailing in many of the woodlands in the southern part of the site and/or inappropriate situation affected or potentially affected by human disturbance.

The current proposal put forward to mitigate against the ecological impacts of the Crooks Copse link include planting a north-south wooded belt to help link Crooks Copse with the remainder of the valley, with a 3m+ 'hop-over' to guide bats over the road. This approach would help reduce bat and barn owl mortality but would not eliminate this risk. There are practical issues of fitting this belt into the valley which at this point is reduced to a narrow corridor by the proposed encroaching development on the eastern and western flanks and also by the construction of a SuDS basin.

This proposal would also cause loss or damage to the swathes of marshy grassland wetland habitat in the vicinity of the link road and would significantly reduce the open character of the valley. Planting possibilities will thus appear to be restricted to the eastern side of the stream / wetland habitat and whilst this is possible and would in due course provide a foraging / commuting route suitable for bats, bats will not necessarily seek out this route and may well continue to use the wider stream corridor / combined with the new SuDS basin, as a route to and from Crooks Copse. In this respect bat activity patterns can be difficult to

accurately predict. Given that planting would not be possible (or ecologically desirable) along both sides of the entire length of the link and the connecting road infra-structure, there would be scope for low flying bat species and barn owls to suffer harm at times, as they attempt to cross the road. Further activity survey is required in order to fully assess this material consideration.

The explanations provided in 4.8 and 4.9 of the Crooks Copse Link text, do not acknowledge the extent, degree and unpredictability of ecological harm arising and we consider it appropriate for the ES Chapter 6 Ecology, to be updated to consider the alternative options and compare the likely impacts and opportunities for mitigation.

NOTE. At the road junction to the east of the proposed link, the drawings appear to indicate incursion into the 15m Ancient Woodland buffer to High Wood Copse. We request clarification in this respect and If this is the case design amendment is required to draw the road further to the north.

LRM 2.8: Reference is made to a new emergency access combined with a new cycle route (overall width 4m), set at a distance of 1m (soft margin) adjacent to the existing Public Footpath (Transport Assessment provided with the application, Appendix E). The LRM response suggests this can be conditioned, and that the design would take into account the proximity to Waterleaze Copse (Ancient Woodland forming part of the High Wood Complex LWS). We welcome the lack of proposed lighting along the route (LGIDMP ES Vol. 3 Appendix G7), due to the potential adverse impacts on nocturnal wildlife. However, the substantially increased width of this route over and above the existing footpath width, is likely to cause harmful habitat loss, including tree, under-storey and ground flora removal and the need to bridge /culvert the shallow watercourse (River Enborne tributary), crossing the northern tip of Waterleaze Copse. This section of stream has both dormouse and also otter and water vole potential (Constraints Plan, Figure 2, EMMP), which, along with

other aquatic and terrestrial fauna and flora could be adversely affected by severance / disturbance resulting from proposed works in this area. At the stream crossing the existing path crosses the copse in a gap of width only 4-5m.

In addition, and not referred to, is the potential impact on Gorse Covert (part of the High Wood Complex LWS), as the route of the combined new emergency access, new cycle route and existing footpath, crosses the north-eastern corner of the woodland and the gap between the woodland edge and an adjacent hedgerow is, similarly restricted and would result in some loss of habitat.

The potential habitat losses resulting from the construction of a partially (the extent of which remains unclear) hard surfaced route, takes no account of the required 15m buffer zone adjacent to Ancient Woodland (which should also be applied to Gorse Covert, whilst not classified as Ancient Woodland never-the-less comprises an integral part of the High Wood Complex LWS) and also the proposed 3m buffers to retained hedges and tree lines (4.3.3 EEMP) . There remains concern regarding likely deterioration and harm to Ancient Woodland and other ecological features and this has not been acknowledged or assessed. We therefore consider it appropriate for the ES Chapter 6 Ecology, to be updated to consider this aspect of the proposals and assess the likely impacts and opportunities for mitigation.

LRM 3.6, 3.7 and 7.3: Despite the additional hydrological information, ecological concerns remain regarding the installation of two engineered SuDS basins in the narrow valley between High Wood and Slocketts Copse. The SPD makes reference to SuDS provision at H2 (p.43) that "...must have regard to the existing springs and woodland areas". H3 (p.44) also emphasises that they are "a place for people to enjoy nature and relax". 6.29 of the amended Flood Risk Assessment and Drainage Strategy, submitted as part of the Wheatcroft proposals, states that SuDS should 'promote biodiversity'. In order that the SuDS basins achieve optimal

biodiversity potential (eg incorporating reedbed, wet and ephemeral habitats, suitable for amphibians, aquatic bird-life and invertebrates), a more expansive design might be required than that currently depicted and which may not physically fit in the valley (see below).

In this respect we would also like clarity as to whether any of the SuDS provisions are included in the BNG calculations, which include 0.25ha of new standing water provision (Table 9 of the BNG) or alternatively 0.15ha of new standing water (Table 14 and Section 5.1 of the BNG).

It is not clear whether the two SuDS to be located within the stream corridor between High Wood and Slocketts Copse and the associated conveyance channels, comply with the D&A (p. 55) statement relating to "retention of ancient, semi natural woodland areas and trees within a 15m buffer of grassland and scattered native scrub". These two basins are located on sloping and generally marshy ground on the valley sides in between the Ancient Woodlands, which tend to be bordered by substantial trees, some of which may have root protection areas (RPAs) in excess of 15m. At its narrowest point this corridor is only of width 30-40m and it is already occupied by an existing watercourse, which runs through the valley to the River Enborne. The need for the stream to be buffered within a protected zone of overall width 16m (4.9.1 in the EMMP and draft condition 28, which exceeds Environment Agency requirements for a 10m wide protected zone but is in accordance with the recommendations of the LLFA in their response to the application), is a further constraint, as is the proposed inclusion of a cycle route and footpaths increasing the pressure on or within the Ancient Woodland buffer.

It is not possible to fully assess the potential impacts on the integrity of the Ancient Woodland buffers, nor to determine whether it is physically feasible to install these components of the surface water drainage system within this sensitive valley ecosystem, in the absence of accurate layout plans and cross-sections of the

proposals. These should be based on accurate site survey, to show the existing and proposed landform with all the existing and proposed features shown, including the necessary biodiverse habitat proposals.

We consider that the extent and degree of potential ecological harm arising has not been acknowledged to date and we consider it appropriate for the ES Chapter 6 Ecology, to be updated to fully assess the likely impacts and opportunities for mitigation.

LRM 4.1 and 4.2: The removal of hedgerow and trees (including T 116, a tree with moderate bat roost potential) to accommodate the proposed western Monks Lane access provision, results (in combination with the proposed eastern Monks Lane access provision) in some adverse ecological impacts including connectivity issues that have not been adequately assessed.

The hedgerow, whilst generally unexceptional in habitat terms, does possess undoubted wildlife value and is shown on the Constraints Plan (Figure 2, EMMP) as having dormice potential, it is also used by commuting and foraging bats and is the only part of the site with recent reptile (grass snake in 2019) records. It also forms part of a continuous peripheral wildlife corridor around the northern site boundary, linking Barns Copse, with Slocketts Copse, through to the SE corner of Crooks Copse and onto High Wood, in ecological connectivity terms. Given that other vegetated connections between these four woods within the site, will be adversely affected through severance and loss of habitat, the functionality of this secondary peripheral wildlife link including Monks Lane, to aid woodland connectivity might be expected to assume a higher level of importance.

In the absence of a strategic planting proposal to retain, enhance and/or replace the sections of hedgerow / trees to be lost, the Council considers that the proposed breaches in the hedgerow

frontage to the site will result in adverse impact in terms of green-infrastructure and ecological connectivity and we consider it appropriate for the ES Chapter 6 Ecology, to be updated to re-appraise the likely impacts and opportunities for mitigation.

LRM 4.6, 4.7 and 7.12 and Statement of Case 6.26: We recognise that there is a potential conflict of views between those expressed in the Amended Arboricultural Assessment and an Ecologist's viewpoint. A tree that possesses features suitable for bats and barn owls etc., might be assessed in arboricultural terms, as one with limited viability and which might be expected to pose a health and safety risk within a residential development or a well used Country Park. This can result in conflicts of interest when decisions are made about tree retention in these circumstances, many of which would not apply in the 'do-nothing' ie no development situation. Notwithstanding this, we consider that more trees than are shown to be removed or subject to works, in the Amended Arboricultural Assessment, will either require removal or significant canopy works either to enable the development, or at a later stage during site occupation. This is due to the failure to include sufficient detail in the arboricultural assessment work carried out to date - including (but not limited to) parts of the eastern site boundary (to enable access to the DNH land and also the Park House School), along with parts of Waterleaze Copse and Gorse Covert and/or adjacent hedgerow / trees (to accommodate the emergency access and cycle path). These elements are discussed in more detail below.

In addition some discrepancies arise within the Amended Arboricultural Assessment including:

Para 1.1 Category C Trees:

- T 225, T226, T227 and T228 have been included twice.
- G247 as listed does not occur in the Tree Schedule but T247 does. Likely the tree is erroneously listed as a group.
- T236 is not included in the list but is classified as 'Fell' in the Tree Schedule.

Para 1.2:

- G247 (actually T247) is omitted from this list of Category C Trees.

Tree Schedule:

- T182 is described as a hedge (is should be H182).

Whilst these are relatively minor errors they cast some doubt as to the accuracy of the document and lack of due care and clarification is requested.

LRM 5.11, 7.5 and 7.18 and Statement of Case 6.27 and Appendix 5: The alternative approach to the Park House School playing field extension appears to offer some degree of ecological benefit. However, additional information is required in order to fully assess the ecological impacts and this includes details of access provision between the school and the extension area, to determine whether any trees and/or hedge sections will be lost (including a number of trees with confirmed bat potential), requirements for spectator areas / outfield and proposed uses of the remainder of the land set aside for school use, along with cross sections to indicate any changes of level proposed.

We welcome the efforts made to retain T34, which is a significant and ancient habitat tree: it is a confirmed barn owl roost (with potential for nesting) and it also has confirmed bat roost potential. Whilst the pitch does not impinge on the RPA of the tree (19.5m radius), it does impinge into the 30m development exclusion area for barn owls (Figure 3 EMMP) by up to 5m. This is critical and once the outstanding information is available regarding the use of land around the pitch, it will be possible to determine whether T34 is likely to retain its wildlife value, during construction and/or the operational phase of the scheme. It is considered highly unlikely that use of the tree by barn owls will continue either during the construction or the operational period, due to the disturbance caused. Any future use by bats is also likely to be compromised.

T33 on the south-eastern site boundary also has confirmed low bat roost potential and the pitch immediately adjoins its 15m RPA. There is a small incursion into RPA of nearby T31, which also has confirmed low bat roost potential. Similar concerns persist concerning any future use of these tree by bats. Future recreational (spectators etc) disturbance / ground compaction within the rooting area of these important trees could also compromise the long term health of these trees and has safety implications to users of the site.

We welcome confirmation within the Feasibility Study (LRM 7.5) that 'does not include lighting of the new playing field'. Any lighting would have further and more substantial impacts on the nearby Ancient Woodland, ancient and veteran trees and their inhabiting wildlife.

In addition, whilst the alternative approach respects the 15m buffer zone around the adjacent Barns Copse (Ancient Woodland), there is no leeway whatsoever and the NE corner of the pitch immediately abuts the 15m buffer zone, with potential for earth works to encroach to some, as yet, unconfirmed extent. In order to satisfactorily protect the special interests and integrity of the woodland from recreational disturbance impacts associated with the playing field, the level of protection offered by the buffer should be maximised ie. it should be strictly out-of-bounds and be designed as dense semi-natural woodland edge and this is likely to involve fencing. This may not be compatible with playing field H&S requirements. Further assessment, including detailed drawings showing protection measures to be afforded to the adjacent Ancient Woodland and to T34 (and also T33 and T31), would be required to determine feasibility and to ascertain whether the suggested pitch arrangement can be achieved without either compromising playability and/or causing undue harm to the nature conservation interests of the area. The current assessment does not acknowledge the extent and degree of potential ecological harm arising and we consider it appropriate for

the ES Chapter 6 Ecology, to be updated to consider the alternative option and the likely impacts pertaining / scope for mitigation.

LRM 5.13: The selected position for the main access between the DNH land and the Appeal Site may not be optimal as it passes between 2no Category A trees within the hedgerow itself (T46 and T48) and involves the loss of part of G47 (a maturing ash specimen). The likely loss / major works to these particular trees has ecological implications which are not fully assessed. Table 3 of the Bat Roost Assessment of Trees and Bat Hibernation Survey report (ES Chapter 6, Appendix F7) indicates that T46 is a confirmed bat roost, G47 has moderate bat roost potential and T48 has low bat roost potential. Table 4, the Bat Hibernation Survey Results indicates that 3 ash specimens in G47 have some suitability for bat hibernation, with one of the 3 ash specimens with high suitability. It is not clear which of the 3 G47 ash trees this is and whether it is the one to be lost to the proposed main access.

Further clarity is required in this respect as there is a current lack of consistency within Appendix F7: whilst T46 and G47 are shown on Figure 3 (Tree Roost Assessment Plan) in the report, T48 is not shown. Furthermore G47 is shown as moderate bat roost potential but there is no indication as to the location of the ash specimen in G47 with High suitability for hibernating bats. The plotted location of T46 and G47 on this plan is different to the locations shown on Figure 2, the Constraints Plan in the EMMP, which adds to the confusion.

To ensure that the proposed main access avoids unnecessary harm to bat roosts or trees with suitability to support bat roosts, accurate plotting of the various trees within G47, along with T46 and T48 is required and this is to be superimposed on the proposed line of the main access. It is likely that an alternative location elsewhere on this hedgerow may be more suitable as the main access, in terms of

avoiding unnecessary disturbance to bat roosts / hibernation sites and we seek further assessment in this respect.

LRM 5.16, 5.17 and 7.5 and Statement of Case 6.26: We refer to the Council's position (which accords with Natural England Standing Advice, the NPPF amongst 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 ecological integrity as a result. A planning condition may be an option to be explored in tandem with other disciplines, to optimise the protective function of the buffers; furthermore, it may be necessary to agree wider buffer widths in more detail (so that they exceed 15m as appropriate to the sensitivity of the location and the magnitude of likely disturbance).

This needs to be determined at an early stage in order to ensure that adequate space is available for all the built features being proposed.

LRM Appendix 3 and Statement of Case 6.32: The Air Quality Assessment associated with Special Areas of Conservation requested by Natural England, has been accepted by Natural England and by the Council.

LRM 7.6: with respect to rush pasture, we recognise that the Appellant proposes a 14% increase in this habitat and welcome this. However, we feel that the opportunity exists to further increase this scarce habitat type (by say up to 30%), given the suitable hydrological conditions that exist within the wider site and to provide substantially greater BNG in this respect. If this concept was agreed, the Council would be prepared to secure this provision and the appropriate specialised management required to help ensure successful establishment, through Planning Condition.

LRM 7.7 and 7.8: in so much as the proposals to provide additional standing water can be agreed (depending on more detail with respect to number, size and the location of proposed new ponds (including sacrificial 'dog ponds') at this stage, we are prepared to accept detailed design proposals as a Planning Condition.

Confirmation that the single, managed access point to the River Enborne, if required, would be for management only and not for public access is welcomed. In this context we are satisfied that measures to ensure that the corridor of the River Enborne and its sensitive fauna (water voles and otter) are safeguarded from human disturbance, can also be secured through Planning Condition.

LRM 7.9: similarly, provided that protection of the secondary woodland in Gorse Covert (for which 4.5.1 of the EMMP confirms that '*there are no proposed plans to implement public access to these woodland blocks*'), along with areas of new secondary woodland, is agreed in principle at this stage, the detail of fencing and treatment of the 15m buffer etc., can be secured through Planning Condition. Effective elimination of recreational disturbance is likely to require secure fencing in combination with effective wardening.

LRM 7.13 and 7.14: we agree that the proposed Country Park offers significant scope for reptile mitigation and in this respect also consider that the type of habitat provision / management regime that is optimal for reptiles, is also to a substantial extent, also suitable for skylarks, lapwings, invertebrates and hunting territory for barn owl (and other birds of prey). In order to optimise the potential value of these areas and promote their use by this wider range of wildlife (including ground nesting birds), it will be necessary to protect significant areas from recreational disturbance / predation by domestic pets.

If this principle can be agreed pre-determination, the Council are satisfied that the detail concerning appropriate safe-guarding

measures can be secured by Planning Condition. This is likely to involve the strategic use of fencing and in this respect parts of the 15m Ancient Woodland buffers could be used to provide safe, undisturbed refuge habitat, if securely fenced to prevent recreational disturbance.

In addition to the on-site skylark plots already proposed, we welcome the offer by the Appellant to provide off-site compensation measures on other land owned by SFP but would also suggest that given the scale of the site and its current level of use by breeding skylarks, larger and/ or more skylark plots would be more appropriate.

LRM 7.16: due to acknowledged presence of dormice in suitable habitat on site, specialist mitigation to conserve and safeguard vulnerable dormice populations and maintain adequate dormouse connectivity (which may, for example, include dormice gantries), will require agreement at the Planning Condition stage.

LRM 7.19: the Council has residual concerns relating to air quality aspects of the scheme proposals, including (but not restricted to) potential impacts on Crooks Copse Ancient Woodland. The woodland will be encircled by infra-structure roads, set at close proximity to the woodland edge. The air quality assessment accepts that there is a high risk of environmental impact from dust during the enabling earthworks and construction process, to sites within 20m of such works. We are uncertain whether sufficient receptors have been included in the air quality assessment to determine, for example, whether the close proximity of the encircling road, combined with approximately 10 road junctions around the perimeter of the wood, will exert significant impacts on the sensitive Ancient Woodland habitat (including woodland ground flora and wetland communities).

We require further assurance in this respect, along with detailed and appropriate assessment and proposals for a carefully considered mitigation package, within an updated ES Chapter 6 Ecology.

We suggest that in this particular location (and possibly other locations on site), that the potential effects of reduced air quality (in combination with other likely disturbance impacts, including but not restricted to noise, lighting, recreational pressure etc.), combine to necessitate a buffer zone in excess of 15m width. This accords with Natural England's standing advice which allows buffer zones of at least 15m around Ancient Woodlands, where assessment shows that impacts are likely to extend beyond this distance.

In this case we would request that the need for a buffer zone of 20m width around Crooks Copse is given due consideration by the Appellant. This could allow for some amenity green infra-structure to be located in the outer 5m (furthest from the woodland) including informal mown paths and managed meadow grass, with the 15m zone adjacent to the woodland fenced, strictly out-of-bounds and fully satisfying the function of semi-natural woodland edge / defensive planting function.

LRM 7.22: The Biodiversity Net Gain calculations (ES Chapter 6, Appendix F21), provide a useful initial indicator of positive net gain associated with the scheme proposals. We disagree with the Appellant with respect to the likelihood or otherwise, of habitat and species degradation and/or decline, as a result of development of the site. We consider that intensification of recreational and domestic disturbance, fragmentation and isolation of priority and irreplaceable habitats and severance effects on key protected and other species of wildlife have been under-assessed. We acknowledge that these indirect impacts are difficult to quantify and are dependant to some extent on the success or otherwise, of mitigation proposals. Notwithstanding, we require careful consideration of these potential indirect impacts, which may be incremental and time dependant, on all ecological receptors, within the BNG calculations (as opposed to limiting the assessment to direct habitat losses and gains), on a precautionary basis and to incorporate a more realistic

recognition of potentially adverse residual factors on the biodiversity interests of Sandlesford Park.

Summary

The above ecological consultation response aims to provide a constructive review of the Wheatcroft proposals with respect to Ecology. It highlights the need for clarification in some specific regards and also the need for the ES Chapter 6 Ecology to be updated, to consider the alternative options put forward and the likely impacts and opportunities for mitigation, relating to the various proposals. It also identifies those areas (mainly regarding species and habitat protection and other mitigation measures) that we believe can be satisfactorily addressed through Planning Condition.

We have also reviewed the Wheatcroft proposals to ascertain whether any of the Reasons for Refusal (Ecology) (Decision Notice October 2020) have been adequately addressed, as follows:

We do not consider that the following Reasons for Refusal (Ecology) have as yet been adequately addressed:

- Reason for Refusal 8: the proposed development does not provide acceptable indications and therefore sufficient confidence and certainty, that it will not cause unavoidable deterioration of and harm to Ancient Woodland on the Site;
- Reason for Refusal 11: insufficient regard has been given to post-construction adverse impacts on existing retained habitats. The proposed development has the potential to have adverse impacts on the local natural environment and such impacts are not adequately addressed or mitigated. Consequently, the proposed development is unacceptable in terms of ecology and biodiversity;
- Reason for Refusal 13: insufficient information has been provided in respect of surface water drainage and as such a

full consideration of the impact of the proposed development in these terms is not possible. Accordingly, the proposed development is considered unacceptable.

We consider that the following Reasons for Refusal (Ecology) have been addressed in part:

- Reason for Refusal 9: the proposed development will cause harm to a number of irreplaceable priority habitats, comprising ancient and veteran trees and a number of other trees that are the subject of a TPO, without satisfactory justification and compensation or mitigation;
- Reason for Refusal 10: the area of land identified for the expansion of Park House School results in the loss of trees and hedgerows (including an ancient tree) that could be avoided by an increase in the area proposed or an alternative proposal. Accordingly, the proposal is unacceptable as it fails to make appropriate secondary education provision to mitigate the needs of the development and ensure the satisfactory provision of a sports pitch.

We consider that the following Reason for Refusal (Ecology) has been adequately addressed:

- Reason for Refusal 12: insufficient information has been provided regarding the likely air quality impacts of the proposed development on European Designated Special Areas of Conservation.

Liz Lake Associates

March 2021

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

[REDACTED]

From: [REDACTED]
Sent: 02 March 2021 16:38
To: [REDACTED]
Subject: Appeal Reference: APP/W0340/W/20/3265460 – Sandleford Park, Newbury

Dear [REDACTED]

These are the LLFA's comments relating to the LRM Planning document "Response to Comments for Consultees" dated Sept 2020, specifically in respect of Section 3 - Lead Local Flood Authority, and of Appendix 2 : Flood Risk Assessment.

Comments on "Appendix 4 : Valley Crossing Study" of the "Appellant's S78 Appeal Statement of Case" are also included at the end.

Comments on Section 3 LLFA

3.3 Pollution Control (Construction Phase). A detailed and comprehensive CEMP for the approval of the LPA will be expected from the Applicant in the event planning permission is granted.

3.4 Pollution Control (Occupied Phase). The LLFA would agree that "*there is no evidence to suggest that there are existing sensitivities that detrimentally impact the hydrology of the site including the water courses contained within*"; that is to say we consider the existing site functions in a natural and balanced way.

However, we consider the implementation of the proposals will be to the detriment of the hydrology of the site, particularly around the Copse areas. For that reason, despite the conclusion of the ES Chapters 6 and 11, it is difficult to see how the completed development (at "Occupied Phase") will have a minor or even a negligible benefit for the site in respect of pollution control when compared to the existing situation and therefore consider that this paragraph is slightly misleading.

This is an un-developed 'green' site, currently subject to little human disturbance that generates hardly any pollution other than from natural processes so despite the 'best efforts' of any SuDS measures that could ever be built, the construction of the SuDS measures in the first place and then a big increase in human usage once the development is occupied will result in a level of disturbance and degradation of the water environment that, by comparison, will be much greater. Future failure of any part of the SuDS management train could also lead to pollution occurrences for the duration of such a failure, which clearly is not a current risk in the site's undeveloped form. The LLFA does not therefore accept the statement given in para 3.4.

3.6 Basins. It is acknowledged that C753 SuDS Manual accepts a side slope of 1 in 3.

3.8 Combined Drainage Strategy. Following consideration of an earlier Brookbanks drainage strategy drawing for the entire Sandleford Park Strategic Site, the LLFA is no longer questioning this issue.

3.9 Flood Risk Assessment. To be dealt with in the comments dealing with the FRA in the following section.

Comments on Appendix 2: Flood Risk Assessment revised by Brookbanks and issued 23/9/2020

It is noted that the original FRA paragraph numbering has not been retained in the revised document which makes it more difficult to follow through. Nevertheless, for clarity our comments now refer to the paragraph numbering of the revised version.

3.2.1 Fig 3-1 : It is noted that the site outline (red line) does not correctly line up with the base mapping, being that the red line extends to the south of the R. Enborne.

- (original Para 2.16) This paragraph (*"In terms of Groundwater Vulnerability the underlying geology is shown on DEFRA's MAGIC maps to form a Minor Aquifer with soils of a High leaching potential across the northern two thirds of the site"*) has been omitted from the revised version; this should be reinstated.

3.15 It is noted that revised Fig 3-5 does not show the site boundary red line.

4.15 States *"Local Policy will be taken not consideration..."* : It is assumed that "not" should read "into".

5.4 Fig 5-1 : It is noted that the site outline (red line) does not correctly line up with the base mapping, being that the red line extends to the south of the R. Enborne.

5.16 This may be an incomplete sentence as it is not capitalised.

- The original Para 4.5 relating to WBC's SFRA has been omitted from the revised version.
- The original Para 4.29 / Table 4f which detailed the recommended maintenance regime to be implemented has been removed from the revised FRA. Maintenance of SuDS features should use the standards set out in C753 SuDS Manual as a minimum.

6.44 This states that Infiltration Testing was carried out in Nov 2014 whereas, although not specifically dated, these tests are likely to have been done in mid-September when the rest of the ground investigation was carried out.

6.48 The LLFA disagrees with the statement *"Any works completed on site supersedes indicative mapping produced by the council"*.

- The original Para 4.50 detailing potential betterment in run-off flows has been removed from the revised FRA.

6.55 Table 6-4 omits the betterment figures originally set out in the predecessor Table 4h, also in para 4.50.

6.63 It is now proposed to use an Orifice for flow control on the detention features instead of a side overflow weir. The LLFA will review this proposal as part of the final design assessment.

6.69 Table 6-8, which is an extract of Table 26.2 from the SuDS Manual, has been revised but has omitted 2 lines from the original table for "Commercial yard...." and "Sites with heavy pollution...." This site will contain delivery areas and non-residential parking and thus these categories should be retained in the table.

6.71 Table 6-9 : This table has been revised and has omitted SuDS mitigation indices for: "filter strip", "bio-retention system", "pond" and "wetland" from the "Type of SuDS Component" categories, implying these features are no longer to be used despite being proposed for use in the development in table 6-1.

- The original table 4n from the same section has been omitted. Although hydraulic design is not based on infiltration, there is some limited potential for infiltration within the site, so unless all SuDS measures where limited infiltration could occur naturally are otherwise to be lined within an impermeable liner, this table should be reinstated.

6.82 The second bullet point has removed the specific percentage reduction in the peak discharge rate. This should be reinstated.

FRA Appx. A – Drainage Strategy drawing 10309DR-02 rev.A : It is noted that the area of Basin A has not been amended to match the input in the MicroDrainage calcs. (5920 m² on drawing, 5650m² in the MD input).

Further to the above, there are 3 new comments which were not submitted previously. Please note these are not reasons for objection and can be dealt with by condition, but it is felt that it is appropriate to bring them to the Appellant’s attention now.

Para.7.3 No calculation parameters were supplied as part of the FRA. We would require the FEH catchment descriptors and the ReFH2 calculation sheets for our review. The supplied calculations have utilised an incorrect climate change allowance for the river flood flow estimation. A 70% climate change allowance in flow should be used in accordance with current Environment Agency Guidance. The 1 in 100 year + 70% climate change peak flow would therefore be 2.53m³/s based on the supplied values. If a detailed hydraulic model based on direct rainfall is undertaken, then a climate change allowance of 40% rainfall would be acceptable.

Para.7.4 No calculations have been provided to back up the figures of 5.97m³/s and of 11.60m³/s in para 7.5 which states that the cross section proposed (for the Valley Crossing) would be able to accommodate these flows.


Para.7.7 Since the development proposal comprises a number of crossings of the ordinary watercourse, detailed hydraulic modelling will be required to confirm the size of the proposed culvert at each location. The detailed hydraulic modelling should also inform the overland pluvial flood risks that originate from Monks Lane and the Newbury College.

Comments on Appendix 4 : Valley Crossing Study of the Appellant’s S78 Appeal Statement of Case

Of the 3 potential options for the crossing set out in para 2.9, the 3rd option shown on VD17562-SK023 & VD17562-STR-SK-003 for the proposed vehicular/ pedestrian straight alignment bridge is least damaging to the hydrology of the area, and probably to the habitat/biodiversity as well. The overall width of the twin deck structure at 16m will create a dark area underneath however so there will be localised detriment resulting once built.

Construction of any of the options will cause major damage to the immediate habitat/bio-diversity and hydrology as inevitably the ‘construction corridor’ will be significant and the necessary construction depth for any temporary road-ways will be deep. The use of temporary metal trackways should be considered. A very detailed CEMP and CMS will be required.

Regards


Senior Engineer (Land Drainage)


www.westberks.gov.uk

Please consider the environment before printing this e-mail

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

[REDACTED]

From: [REDACTED]
Sent: 03 March 2021 14:05
To: LRM Planning
Cc: PlanningPolicy
Subject: Sandleford Park, Newbury, West Berkshire APP/W0340/W/20/3265460

Dear Sirs,

Thank you for your consultation under the 'Wheatcroft' principles. In response to the points you raise in section 8 (in Response to Consultee Comments) regarding Planning Policy we have the following comments.

With regard to affordable housing, specifically the tenure mix, we note the appellants will seek to address this in the planning obligation. As outlined in our consultation response, and in compliance with Core Strategy Policy CS6 and the Sandleford Park Supplementary Planning Document 70% of the affordable housing is to be solely social rented.

With regard to renewable energy, further to what has already been said, the Council declared a Climate Emergency in 2019 and subsequently adopted an Environmental Strategy in 2020. It is therefore especially important for the appellants to demonstrate that they can deliver on-site renewable energy generation, as well as adopt best practice sustainability methods (e.g. in building methods). This should be factored in at an early stage, in the masterplanning and costing for the development. The Climate Emergency and Environmental Strategy has resulted in the formulation of Local Plan policies specifically relating to these issues and ensuring that the environment is considered essentially at the heart of development. These include Policies SP5, SP16 and DC3 in the Emerging Local Plan Review.

Furthermore, the Government, in its consultation document 'Future Homes Standard', proposed changes to Part L of the Building Regulations. As part of the proposed standard new homes, from 2025, will not be built with fossil fuel heating, and these homes will be future proofed that no energy efficiency retro fitting will be required. Local Plans will still be able to set local energy efficiency standards for new homes, and these will go beyond the minimum standards set through the Building Regulations. The Government expects energy efficient, low carbon homes to become the norm, and given the build out time for Sandleford Park there is an opportunity to adopt methods of on-site renewable energy generation for the benefit of its residents and to reduce its carbon output. The consultation version of the NPPF retains an emphasis on Local Plans mitigating and adapting to climate change. Therefore, it is considered that the site provides a real opportunity to provide on-site renewable energy, adopting best practice sustainability methods, and to establish such methods at this outline stage. The proposal remains contrary to Policies CS3, CS14 and CS15 of the Core Strategy and Development Principle R1 and R3 of the Sandleford Park Supplementary Planning Document.

Thank you for considering these points.

Kind regards

Planning Policy Team
West Berkshire Council
[REDACTED]

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

Planning Application No: 20/01238/OUTMAJ

Proposal: 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.

Address: Sandleford Park, Newtown Road, Newtown, Newbury

Documents Seen:

- LRM Planning Ltd, Sandleford Park Newbury, Section 78 Appeal: Statement of Case dated December 2020
- Amended Arboricultural Impact Assessment dated 9th October 2020 (ref:14281-AA8-CA)
- LRM Planning Ltd, Sandleford Park 20/01238/OUTMAJ Response to Comments for Consultees Dated September 2020

Observations

The parts of the following documents which have been found that relate to trees are:

- Statement of Case – Paragraphs 6.26 – 6.30
- Statement of Case – Appendix 4 ‘Valley Crossing Study’ (starting at page 43 of the attached Statement of Case, pages 58-81 in the attached pdf);
- Statement of Case – Appendix 5 ‘Park House School Playing Field Scheme’ (alternative proposal) starting at page 44 of the attached Statement of Case, pages 82-83 in the attached pdf);
- Amended Arboricultural Impact Assessment dated 9th October 2020 (ref:14281-AA8-CA);
- Response to Comments for Consultees document – Section 4;
- Response to Comments for Consultees document – Appendix 1 Visibility Splays for Access onto Monks Lane (in respect of how those may impact on tree removal along Monks Lane).

Trees and Ancient Woodland

The Statement of Case submitted makes the following comments:

6.26 Each of the Ancient Woodlands within or adjoining the Application Site are afforded a buffer of 15 meters. This accords with the extent of buffer required by the LPA's SPD and the minimum buffer recommended by Natural England. The illustrations within the Design and Access explain the interface between built development, the buffer and the woodland and the precise arrangement of built development where it adjoins Ancient Woodland will be a matter determined at the reserved matters stage. The Appellants have updated its Arboricultural Assessment in response to comments from the Council's Tree Officer, and this accompanies the submitted Appeal. Natural England do not object to the proposed development in terms of its impact on Ancient Woodland.

6.27 T34 shown on the Arboricultural Assessment is an ancient tree that will need to be felled to enable the expansion of Park House School. The expansion of Park House School is a policy requirement in the Core Strategy; this will require re-modelling of the school to provide new and additional classroom spaces within the existing curtilage of the School and new playing field land adjacent to it. This new playing field land cannot be provided contiguous with the School's existing boundary at any other point. The Appellants note that the Council suggest that T34 could be retained if the playing field is sited differently and have considered this further. Attached at *Appendix 5* is a drawing which shows how this could be achieved; whilst this enlarges slightly the area of the land safeguarded for Park House School, this arrangement remains in accordance with the Land Use and Access Parameter Plan.

6.28 Significant new planting is proposed within the Country Park to mitigate and compensate for the loss of trees. This accords with para 175c of the NPPF.

6.29 Landscaping is a 'reserved matter' and the Appellants' suggested planning conditions intend that Landscape and Ecological Management Plans are prepared for each phase as part of the reserved matters process. Similarly, the detailed design of the Country Park will be required by way of planning condition. This approach allows for detailed design considerations and mitigation planting to be determined at that time and in the context of strategic level documents prepared as part of the outline planning application (Strategic Landscape and Green Infrastructure Plan, Landscape and Green Infrastructure Design and Management Plan, Ecological Mitigation and Management Plan). These are measures that are consistent with the design approach anticipated by the SPD.

6.30 Contrary to RFR 2, 3, 8, 9 and 10, the proposed development accords with Core Strategy Policies CS3, CS17 and CS18 in respect of landscape and visual effects and impacts on trees and woodlands.'

My response to the statement of case is below:

All of the woodlands within the site require a minimum buffer of at least 15 metres as per L4 of the Sandleford SPD. The buffer needs to be extended beyond the 15m if as a result of pressure from the life of the development will cause the loss or

deterioration of the ancient woodland. This in my view has not been clearly demonstrated by the applicant or considered by the Arboricultural Impact Assessment.

Natural England **do object** to the proposed development in terms of its impact on Ancient Woodland under their Advisory comments:

Ancient Woodland

Natural England advises that the proposals as presented have the potential to adversely affect woodland classified on the ancient Woodland Inventory. Natural England refers you to our Standing Advice on ancient woodland.

The retention and possible protection of T34 is welcomed however I note the RPA has been amended to 19.5m (I assume this is 5m from the canopy edge?) there is very limited scope for working room between T34 and T35 to construct the pitch. There has been no comment from the Arboricultural Consultant in relation to the retention of this tree. Comments would be welcomed as well as the long term impact of the proposal.

The new planting and woodland planting shown on the southern boundary around Waterleaze Copse, is however inadequate for the scale of the development and the potential impacts on the ancient woodland. Crooks Copse is shown to be isolated by the development around 90% of the site and then roads and footpaths along the southern boundary.

I fully agree with the Forestry Commission that the linking of the woodlands by joining them up through native planting will allow them to become more resilient to climate change in the future and allow the woodland fauna to move between woodlands.

The Forestry Commission put it well in their objection under the heading Green Infrastructure:

While substantial areas of open space are included in the eastern part of the site the design suggested on the illustrative Strategic Landscape and Green Infrastructure Plan seems relatively unimaginative. Given the implications of climate change perhaps more woodland could be included to help reduce the net carbon cost of the development? New woodland would have a greater capacity to accommodate access and would reduce the pressure on the sites ancient woodland.

I totally agree with the statement more trees and woodland should be provided on this site.

The significant amount of hedgerow will be lost as a result of the accesses onto Monks Lane. The amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals consider the loss of the trees and hedgerow as a 'limited' contribution and then goes onto say none of these trees are significantly important. This is disingenuous, as a group of trees within the hedge line they are an important feature. Please see google street map image below.

https://www.google.co.uk/maps/@51.3843156,-1.3298249,3a,75y,205.09h,82.3t/data=!3m6!1e1!3m4!1sOd_k6CfwJOKN2Rp29mr_SQ!2e0!7i13312!8i6656

The amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals considers there to be no significant loss in the medium or long term, however it is not defined what length of period this is.

A detailed tree impact assessment should have been submitted to show the extent of the hedge and tree removal along with the mitigation measures in terms of significant landscaping to be able to demonstrate that the proposal for the accesses to the site are achievable.

Site lines have been shown on the plans highway technical plans on the Statement of Case but none of the hedgerow removal or the trees to be removed are shown.

In my view I consider the hedgerow along Monks Lane as one of the visually important hedgerows on the site and should be carefully considered to be retained where possible as part of the strategic objectives in the Sandleford SPD.

The significant loss of 250+ metres would require significant amount of landscape mitigation which has not been clearly demonstrated as achievable as part of the application or the amendments and additional information provided as part of the Wheatcroft consultation.

Appellants Statement of Case – Appendix 4 ‘Valley Crossing Study’

As detailed in Appendix 4 of the appellants’ statement of case, two alternative proposals for a valley crossing to those submitted with the application have now been proposed, as shown below:

	VD17562-SK014	VD17562-SK001	VD17562-SK023 / VD17562-STR-SK-003
Landscape and Visual	The at grade option would require extensive embankments which could appear artificial and sever the openness of the valley.	This scheme reduces the openness of the valley because of the introduction of the embankments.	This scheme shows a horizontal carriageway and open columns, both of which preserves the openness of the valley.
Hydrology	The existing ditch is left unencumbered with sufficient free height and width provided to not impact on storm water conveyance. It is expected that a box culvert will be required to facilitate the water flow, which in itself is not an issue.	The new at grade road severs the capacity of the open ditch and could create unacceptable levels of ponding and flooding on the northern side of the road.	The height of the bridge allows the existing ditch to be completely unencumbered, with no culvert or physical works to be carried out. Furthermore, the bridge columns are location sufficiently away from the ditch to not pose any adverse issues.
Ecology	This option will result in the loss of marshy grassland, of which a small area is habitat of principal importance (HPI). This requires compensation elsewhere on site. The crossing does impact on north/south connectivity, however this can be mitigated through suitable sizing and design of the culvert.	This at grade option takes a less direct approach, resulting in a greater amount of hard surfacing and permanent habitat loss. There could also be impacts on the hydrology of the valley, and ability of wildlife to traverse the crossing (with a much smaller culvert designed).	The use of a bridge minimises the loss of marshy grassland habitat through the valley, where it is limited to the footings of piers. Impacts on the valley sides are also reduced. There is no loss of connectivity with wildlife able to freely pass beneath. The piers avoid the existing ditch and there will be no impact on hydrology.
Trees	The embankment and level changes required to implement this option would cause the direct loss of T76. Level changes would also occur at the outer edge of T78.	This option would encroach within the RPA of T77, likely causing significant impact because the heavily wet soil would prevent the use of tree-friendly no-dig surfacing solutions.	Allows for the retention of the high-quality trees T69, T77 and T78.
Trees to be removed*	Part of G68 (cat C) T69 (cat B)	Part of G68 T69	Part of G68 T69

	VD17562-SK014	VD17562-SK001	VD17562-SK023 / VD17562-STR-SK-003
	T76 (cat A)	Part of G75 (cat C)	
Retained trees impacted*	T78 (cat A)	T77 (cat A)	None
Access	This scheme provides two separate carriageways on a single embankment. The geometry is as follows: carriageway 6m wide cycleway 1.5m x 2 footway 2m x 2 separation 4m The total width of the structure is 17m plus embankments. To provide emergency access to DPC, WBC (Highways) refer to the need for two separate and independent access road structures across the entire width of the central valley.	This at grade route provides the following geometry: carriageway 6m cycleway 1.5m x 2 footway 2m x 2 The total width of the structure 13m is plus embankments. Earthworks and retaining walls would be required on the northern side of the Valley to achieve gradients that accord with Standards.	The design of the bridge provides the following geometry: carriageway 6m cycleway 1.5m (northbound) footway/cycleway 4.5m The overall width of these structures is 16m. The separate eastern structure is sufficiently wide to serve as an emergency access (> 3.7m) and mitigates against the potential for an obstruction to emergency vehicles.

*see summary of value below

Arboricultural Value

G68 – Category C. Hazel, hawthorn, blackthorn, goat willow, holly. An overgrown hedge now forming a linear group of small trees and shrubs.

T69 – Category B. Birch. A twin stemmed mature tree of moderate quality.

G75 – Category C. Hawthorn, blackthorn, hazel, sycamore. A linear group of small trees and shrubs.

T76 – Category A. Oak. A mature, open grown tree in wet and marshy ground.

T77 – Category A. Oak. A mature, open grown tree in wet and marshy ground.

T78 – Category A. Oak. A mature tree on the edge of a larger group, with some deadwood and evidence of limb failure.

The low-quality trees (G68 and G75) have very little potential to contribute to local character because of the backdrop of large trees to be retained.

The loss of the moderate quality tree (T69) will be buffered by the retention of the significant trees in close proximity.

Trees T76, T77 and T78 are high quality mature trees and should be retained if possible. Their loss would have an impact on the character of the immediate vicinity.

There will be not be any adverse impacts on retained trees by Option VD17562-SK023 and VD17562-STR-SK-003 once the development is completed and occupied.

Statement of Case Appendix 4 Valley Crossing Study - Response

Valley Crossing number SK03 gives the indication of that it is going to be less harm in terms of impact on trees, this is welcomed and subject to further details, this in my view is the preferred option at this stage.

Statement of Case – Appendix 5 ‘Park House School Playing Field Scheme’ Response

The retention and possible protection of T34 is welcomed, I note the RPA in the amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals has been amended to 19.5m. There is very limited scope for working room between T31, T33 and T34 to construct the pitch on the amended location. This needs to be clearly shown that it is achievable which as shown does not prove it is deliverable under the current scheme in relation to the trees.

There has been no comment from the Arboricultural Consultant in relation to the retention of this tree. His professional comments would be welcomed as to the long term impact of the proposal on these trees.

These are all considered veteran status in accordance with the Woodland Trust and are on their register of ancient tree inventory.

[Ancient Tree Inventory - Woodland Trust](#)

Response to the Amended Arboricultural Impact Assessment dated 9th October 2020 (ref:14281-AA8-CA);

Additional information within the amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals shows the following trees to be removed in the amended application:

T218, T219, T220, G223, T231, T232 – These are Field Maples and Ash trees along the northern section of the site adjacent Monks Lane where the Proposed Roundabout is positioned.

I cannot find any further amendments within the document submitted and none have been clearly identified which would have been helpful in the consideration of this amended information.

The Arboricultural Assessment is still showing the removal of veteran trees including T127. Under the BS5837 guidance veteran trees should be categorised as 'A3'. This has been surveyed in the report as a mature oak tree of 150cm in diameter and 25 metres in height. They even say in the notes this is a candidate for veteranisation but then still show it to be felled. This is unacceptable.

In my view I consider the hedgerow along Monks Lane as one of the visually important hedgerows on the site and should be carefully considered to be retained where possible as part of the strategic objectives in the Sandford SPD. The trees have been graded as category 'C' which I consider significantly plays down the landscape significance of the hedge and tree line. I consider these trees and hedge line collectively as 'A2' or 'B2' in accordance with the Tree Categorization Method in the British Standard.

The significant loss of 250+ metres would require significant amount of landscape mitigation which has not been clearly demonstrated as part of the application.

Response to Comments for Consultees document – Section 4:

In respect of para. 4.1 **Monks Lane** of this document submitted as part of the Wheatcroft proposals - additional trees have been shown in the amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals but the plans referred to should be combined, to enable a clear and holistic understanding of the proposals in relation to the impact on trees and hedgerows, otherwise it is difficult to assess correctly.

I disagree that the hedge along Monks Lane is low quality as stated in para. 4.2 of this document submitted as part of the Wheatcroft proposals. I would assess it as category A or B if you were to consider it against the BS5837 table. The significant loss of the hedge in my view unacceptable.

Ancient Woodland (paras. 4.3, 5.15 and 5.17 of this document submitted as part of the Wheatcroft proposals)

A buffer zone's purpose is to protect ancient woodland and individual ancient or veteran trees. The size and type of buffer zone should vary depending on the scale, type and impact of the development.

For ancient woodlands, you should have a buffer zone of **at least 15 metres** to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

A buffer zone around an ancient or veteran tree should be **at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter.**

Where possible, a buffer zone should:

- contribute to wider ecological networks
- be part of the green infrastructure of the area
-

It should consist of semi-natural habitats such as:

- Woodland
- a mix of scrub, grassland, heathland and wetland planting

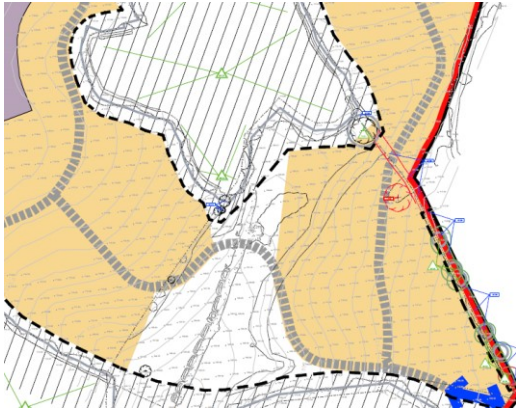
You should plant buffer zones with local and appropriate native species. You should consider if access is appropriate and can allow access to buffer zones if the habitat is not harmed by trampling.

You should avoid sustainable drainage schemes unless:

- **they respect root protection areas**
- **any change to the water table does not adversely affect ancient woodland or ancient and veteran trees**

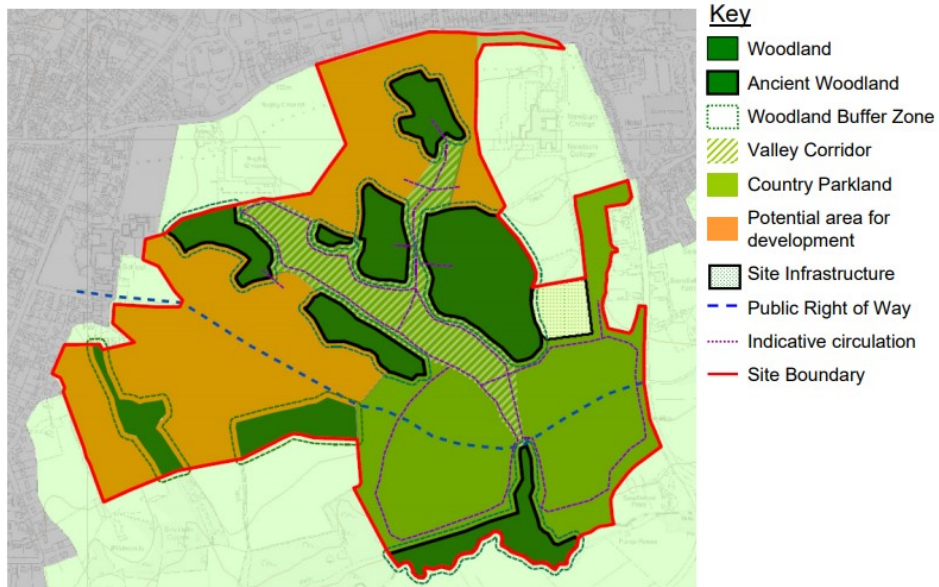
The application should be refused if the as a result of future pressure from the life of the development will cause the loss or deterioration of the ancient woodland. Insufficient information or assessment has been provided by the appellant to demonstrate the impact of the development on the woodlands and the size of buffer required to adequately protect the woodlands. .

The proposed development around Crooks Copse, as shown below in Tree Protection Plan shows a significant amount of development on the south eastern side, previously I understood this section to be a children's play area?

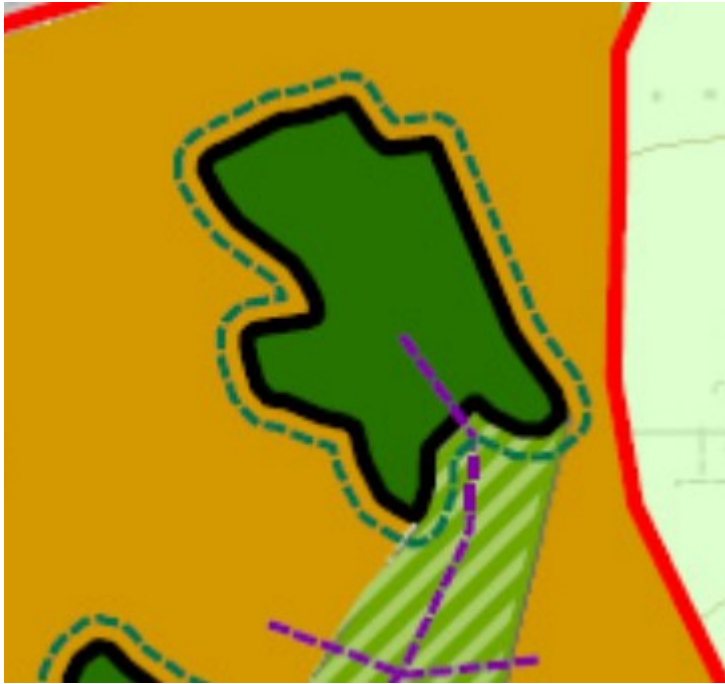


Within the Sandford SPD Figure 6 Landscape Framework Plan, the Valley Corridor gives more green space, reducing the impact on the ancient woodland.

Figure 6 Landscape Framework Plan



Reproduced from Ordnance Survey map with permission of the Controller of Her Majesty's Stationery Office © Crown Copyright 2013.
West Berkshire District Council 100024151



Para. 5.17 of this document states that 'A planning condition could be drafted to specify (1) that each buffer should be not less than 15m in width, (2) the measure for calculating this, and (3) the uses that would be permissible within the buffer zone. Such a planning condition would control the reserved matters applications and the various schemes which are proposed in relation to landscape and ecological management and the design of the Country Park.'

The applicant must demonstrate, through appropriate assessment of the impact on woodlands as a result of the development proposed, that the buffers to woodlands are adequate in accordance with the latest government guidance and the SPD and the development will not result in the loss or deterioration throughout the life of the development. In my view they have not clearly demonstrated this.

The applicant in my view needs to demonstrate that the points of access, with the significant hedge loss can be mitigated against, in terms of landscaping proposal at the access main access points. This in my view has not been demonstrated.

I disagree that the loss of trees within the arboricultural assessment will have no significant impact. In my view, the proposed removal of a significant amount of hedgerow containing groups of trees (in excess of 250 metres) along Monks Lane on the edge of town, will clearly have a significant impact.

There is no landscaping information provided by the applicant to mitigate the loss and in my view it is unacceptable with a proposal of this scale and magnitude to address that loss by condition without sufficient information to demonstrate how that loss can be adequately mitigated with new planting.

Response to Comments for Consultees document – Appendix 1 Visibility Splays for Access onto Monks Lane

In my view potentially a significant amount more hedgerow will be lost as a result of the two accesses, however this is not clear on the information submitted. There will likely be a direct impact on the trees on the opposite side of the road T222 and T233, which are 'A' graded. These are large mature oak trees with a diameter of over 90cm dbh and form a significant feature as you drive along Monks Lane. They are outside the appeal site but require careful consideration as the proposed western access onto Monks Lane will impact on those trees.

A combined plan with the trees and hedgerow to be removed as shown on the Tree Protection Plan as well as the trees and hedgerow to be planted as part of the proposals is necessary to adequately understand the implications of the development proposed.

Additional comments

- As Access is a matter to be considered, I would have expected a detailed plans showing the extent of the proposed accesses onto Monks Lane, as well as details of the emergency access onto the site and the impact of those on trees and hedgerows. In addition, details of the impact on trees and hedgerows as a result of the valley crossing, link road, crooks copse line and key footpath and cycle path routes as they exit the site would be expected.
- In particular, I would like to see exactly how the proposed roundabout impacts on the hedgerow and the trees. This would be able to give me a clear idea of the impact of this proposed access.
- I would have liked to have seen a detailed landscaping plan showing what species numbers of plants and density to mitigate against the tree losses at the proposed access points.
- The information submitted in my view does not go far enough to enable an adequate assessment of the proposal to be made.
- A significant proportion of the site is described on the British Geological Survey as London Clay formation. It is critical that any soft landscaping designs are very carefully considered as part of this appeal as there is potential significant consequence of premature removal of the trees.
- Ash Die Back is likely to have a significant impact on the site as there are a large number of Ash trees within the woodland and along the hedgerows. The Ash are likely to die over the next few years and will have to be replaced. This has not been considered in any of the submissions.

Summary

- The application as proposed has the potential to adversely affect the ancient woodlands.
- The proposed indicative tree planting on the southern boundary is not sufficient.
- The amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals does not sufficiently assess the loss of the hedgerow and trees along Monks Lane and underestimates the impact of the proposed accesses into the appeal site.
- The Arboricultural Assessment shows the removal of a veteran tree marked as T127, this is unacceptable.
- As a result of the proposed accesses hundreds of metres of hedging will be removed if this appeal is allowed, with inadequate information to demonstrate that whether sufficient replacement landscaping can be achieved to mitigate against the proposed access points on Monks Lane.
- The proposed long term retention of an ancient tree marked as T34 has not been considered in the amended Arboricultural Assessment and Method Statement submitted as part of the Wheatcroft proposals and still shown to be removed.
- Large scale native tree planting to join the ancient woodlands together are necessary to create new wildlife habitats and landscape features and help to create 'green corridors' linking isolated wooded areas with new planting.

Recommendations

The amendments submitted as part of the Wheatcroft proposals, including the amended Arboricultural Assessment and Method Statement do not overcome my reasons for refusal.

Signature.....Date.....21/02/2021.....

Senior Tree Officer

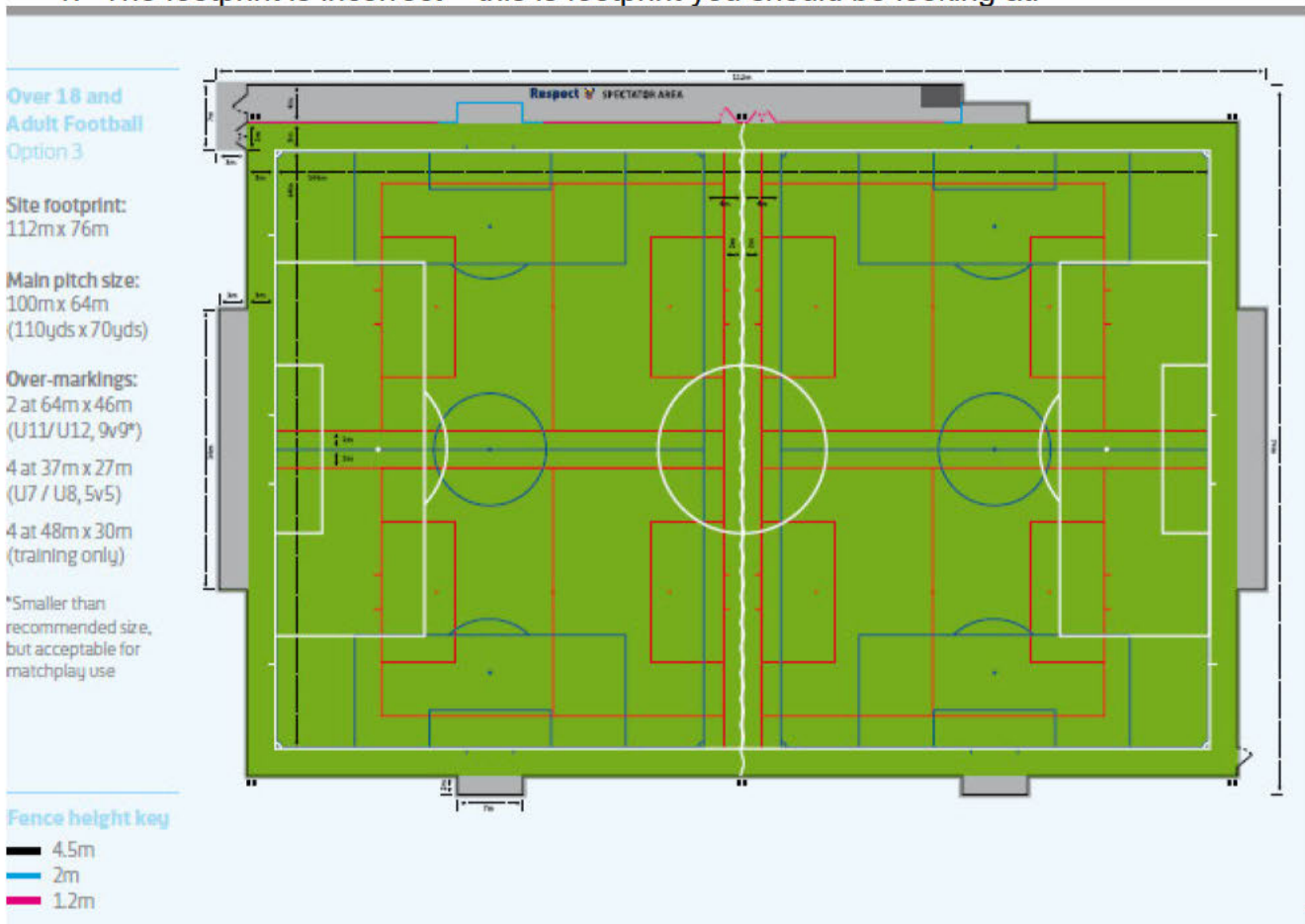
From: [REDACTED]
Sent: 04 March 2021 11:06
To: [REDACTED]
Subject: RE: Planning Appeal APP/W0340/W/20/3265460

Good morning [REDACTED],

Thank you for your email inviting comments on the appeal submission. To be complete honest I am some what confused. Contained int the Statement of Case December 2020 there is a new position for a pitch : dwg: 001-01122020B. It is the last page in the document. This is the first time I have seen this plan. I have a number of concerns.

If the pitch is still to be an artificial pitch (AGP) – bearing mind your other documents discuss a ‘4G’ AGP.

1. The footprint is incorrect – this is footprint you should be looking at:



This

is out of *The FA Guide to 3G Football Turf Pitch Design and Principles and Layouts*

2. There would need to be sports lighting provided
3. As been have discussed before, you would need to provide strategic justification. There is already a 3G AGP on site and there are plans to create one on Newbury RFC, as a relocation of Faraday Road Stadium. It is difficult to see how some many 3G AGPs can work in such a close proximity – not even the FA have come forward with more than 2 in an area this size.
4. We would need to see a business plan with sinking fund.

5. There would be concerns of the impact of T33 and T34;
6. The fencing required may be a visual amenity issue;
7. Drainage could also be an issue.
8. We don't really support pitches so close to trees due to the increased maintenance issues/cost;
9. Where would the pitch be in relation to the housing? – Acoustic issues;
10. How do you access the AGP? Footpath?

I am sorry but we could not support this proposal without further information.

If it is a natural pitch.

- a. The area of land is too tight which will lead to higher maintenance costs
- b. You will still have stop fencing issues;
- c. Would there be fencing around the whole/part pitch? - possible H & S issues due to embankment;
- d. You may have root issues being so close to the trees, which could interfere with any drainage system required.

We could not really support a natural pitch which is shoe horned into a position shown on the drawing.

Why football?

It would be better if it was natural pitch to create a larger area to reduce the maintenance costs and give more flexibility for the school/community use. I appreciate the sporting element is small beer compared to the wider picture, but what is proposed is extremely poor.

Best wishes

[Redacted]

[Redacted]

We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

From: [Redacted]

Sent: 01 February 2021 13:46

To: [Redacted]

Dear Sir/Madam,

I am emailing in regards to the Appeal lodged against the decision of West Berkshire Council to refuse planning application at Sandleford Park (ref:20/1238/OUTMAJ) on the 13th October 2020. The enclosed letter sets out the additional material which is to be included in the Wheatcroft Consultation for this appeal as well as a link to access this information.

The deadline for submission of comments is the 22nd February 2021. Should you have any queries, please do not hesitate in contacting either myself or my [Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Registered Address



DISCLAIMER: The contents of this e-mail and of any attachments, are confidential and may be privileged. If you have received this e-mail in error you should not disclose, disseminate, distribute or copy this communication or its substance. Please inform the sender and delete it from your mailbox and/or any other storage device. LRM Planning Limited does not accept liability for any statements made which are the sender's own and not expressly made on behalf of LRM Planning Limited or one of its agents. Please note that neither LRM Planning Limited nor any of its agents accept any responsibility for viruses that may be contained in this e-mail or its attachments and it is your responsibility to scan the e-mail and attachments (if any).

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

From: [REDACTED]
Sent: 19 March 2021 11:18
To: LRM Planning
Subject: Wheatcroft proposals response

Importance: High

Good morning,
Please find below the response from the Education Service to the Wheatcroft proposals.

- 1) The proposal submitted is for a 3G pitch. Sport England have provided feedback on the provision of such a pitch and have concerns about both the business case for a 3G pitch and also whether there is sufficient space to meet the FA guidelines. The pitch is also not proposed to be lit, which would further impact on the business case as we understand it. There are also significant maintenance and upkeep costs associated with a 3G pitch, which could result in resurfacing after 10 years at a current cost of around £200,000.
- 2) Having regard to the response of Sport England and the significant ongoing costs, we do not consider a 3G pitch necessary or justified. It would appear to place a significant burden on the school and LA, and the location of the proposed pitch and the lack of lighting would appear to impede our ability to offset that burden with lettings income. It should be noted that this does not constitute a request for lighting but merely recognises that without it the opportunity to offset the significant maintenance costs are reduced.
- 3) A natural turf pitch would seem a more suitable option for this area and the Wheatcroft drawing would suggest that a full size natural turf football pitch could be accommodated on the land as shown. This is based purely on the size required. The land would still need to be suitably prepared without compromising on the useable space and without creating a negative impact on the natural environment, such as the veteran trees and ancient woodland buffer.
- 4) The proposals would require engineering works to level and prepare the land, due to the topography, which was also the case with the original proposal. It would need to be demonstrated that these engineering works could be accommodated within the boundary shown, would not impact on the size of the pitch that could be accommodated and would not impact on the ancient woodland buffer or the veteran trees.
The Wheatcroft documents suggest that this is a matter for the LA to deal with. It does not seem reasonable to provide land with topographical issues, issues of veteran trees and woodland buffers and no certainty that the land could be used for the intended purpose. It is our opinion that the appellant should provide land to the LA that is already prepared for sporting use and has the necessary permissions in place to guarantee this use. If the appellant would like the LA to prepare the land then we would expect to see a fully designed and costed scheme for achieving this to be provided and for the costs to be included in the draft Unilateral Undertaking, although it should be noted that this is not our preference.
- 5) A natural turf pitch in the location proposed would not be ideal as the pitch is shown up against the perimeter on two sides. This would restrict spectators to a single side only and would still require areas of 4.5m fencing along the boundary with the new development. The pitch would also be tied to a single location, which would prevent pitch rotation to reduce the wear on the goal areas. However, whilst these factors make the proposal less than ideal a pitch in this area would not be unacceptable to the Education Service or school.

- 6) The proposals would leave the school to manage and maintain the veteran trees on the expansion land. No provision is made to establish the condition of these trees or to provide for the maintenance of the trees in the future. It is understood that ancient and veteran trees should be fenced /protected to the extent of their root protection areas. We feel that provision should be made in the draft Unilateral Undertaking to firstly provide a survey of the trees and their condition and also to make provision for their future maintenance and any fencing required for the protection of these trees.

Regards,

[REDACTED]
**Education Place Planning Team Leader,
Education Service
West Berkshire Council**

Please note that I work all day Monday to Thursday and until 2pm on Friday.

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed may not necessarily represent those of West Berkshire Council. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this e-mail in error. All communication sent to or from West Berkshire Council may be subject to recording and or monitoring in accordance with UK legislation, are subject to the requirements of the Freedom of Information Act 2000 and may therefore be disclosed to a third party on request.

RESPONSE

To: [REDACTED] **Our Ref:** 20/01238/OUTMAJ
From: [REDACTED] **Your Ref:**
Highways Development Control
Team Leader
West Berkshire Council
Extn: 2207 **Date:** March 3rd 2021

Land at Sandford Park, Newbury – North and Central (Bloor Homes)

Up to 1,000 new homes; 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 sqm, B1a up to 200 sqm) 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.'

I have viewed the '*Response to comments to consultees*' and the '*Statement of Case*'

Response to comments for consultees

Section 2 of the above provides the following statements that I will respond to in turn

*"Mitigation measures.
A339/Pinchington junction improvement*

From the results of the VISSIM highway modelling, the highway authority is of the view that the above junction needs to be funded entirely by Bloor Homes. The cost is estimated to be circa £10.5 million.

"Restricting development in DPC to 100 occupations will unnecessarily reduce the available patronage to the bus service".

The highway authority considers that the numbers of units in Development Parcel Central (DPC) are restricted to 100 dwellings in the absence of satisfactory emergency vehicular access to DPC. Furthermore it is noted that emergency vehicular access to DPC would be an unnecessary requirement were the proposal to be part of the comprehensive development of the strategic allocation.

"Valley Crossing.

It is suggested in the consultation response that two separate carriageways would need to be extended to level ground and the bridge would need to be two separate structures. We consider that both of these are achievable. In particular, the culvert over the stream could be split into 2 culverts".

This would assist in resolving this issue, but further amendments are currently required regarding passing places etc.

“There is also the comment about a passing place being required but this does not seem logical; as we are dealing with an emergency access here with good visibility so anyone approaching the crossing would be able to see an emergency vehicle approaching. Furthermore, the hard surfacing width on each carriageway is 7.15m (3m for vehicles, 1.5m for cycles and a 2m footway) so two vehicles can pass in any case”.

The provision of a passing place was recommended and continues to be recommended due to the long distance involved that is over 160 metres. 160 metres is considered too excessive to be acceptable.

“It should be remembered that this plan is illustrative rather than a detailed element of the scheme. The LPA have previously acknowledged that this requires a number of considerations to be taken into account (highway, ecology, landscape, water resources) and that this can be addressed at a later stage as part of the detailed design”.

“Public Right of Way. A 3m wide emergency access is proposed to run adjacent to the Public Right of Way Footpath Greenham 9, which would connect the site to the A339. It has been stated that the emergency route would need to be a 3.75 metre bonded surface. A detailed design for this route, including its alignment and surface treatment, could be conditioned by the LPA or included with the Country Park Scheme which is to be designed in detail at a later stage”.

I still have significant concerns that the diversion that an emergency vehicle would need to take using this route is much too long.

“Visibility Splays.

2.4 x 43 metre visibility splays have been added to the two access drawings and these are included at Appendix 1”.

The ‘*Transport Consultation Response*’ to Hampshire County Council is noted, I have no comments to make regarding this submission. Buses along the A339 are mentioned within the response from HCC. It would be hoped that the potential of buses routing into the site from the A339 could be considered

Statement of Case

Within Appendix 4: Valley Crossing Study alternative options are shown on the following plans:

- *VD17562-SK014: proposed alignment & cross/ long sections parallel option*
- *VD17562-SK001 (rev B): alternative horizontal alignment / VD17562-0001 long section*
- *VD17562-SK023: proposed vehicular/ pedestrian straight alignment bridge and VD17562-STR-SK-003: proposed parallel structures straight alignment option”*

VD17562-SK014: proposed alignment & cross / long sections parallel option was submitted previously. This remains unacceptable, as I consider that for this to work, the two separate carriageways would need to be extended to level ground, and the bridge would need to be two separate structures. This is for instance to enable separate maintenance schedules for any structure without affecting the other that would remain open. I also consider that at least one passing place would be required within the narrowing on both routes.

- VD17562-SK001 (rev B): *alternative horizontal alignment / VD17562-0001 long section.*
This proposal is unacceptable as only one six metre wide route is provided

- VD17562-SK023: *proposed vehicular/ pedestrian straight alignment bridge and VD17562-STR-SK-003: proposed parallel structures straight alignment option* is an improvement on VD17562-SK014 as two separate carriageways and structures have seemingly been to be extended to level ground. However I still consider that at least one passing place would be required within the emergency route.

Conclusion

Currently the highways reasons for refusal still stand.

 **Control Team Leader**