

PROOF OF EVIDENCE OF MARK FLATMAN: LANDSCAPE AND VISUAL ISSUES

ON BEHALF OF:

West Berkshire Council

IN RESPECT OF:

An appeal by Bloor Homes and Sandford Farm Partnership against the Refusal of Planning Permission by West Berkshire Council on the Application for: *“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”.*

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1 INTRODUCTION

1.1 Qualifications and Experience

- 1.1.1 My name is Mark Flatman. I am a Chartered Landscape Architect and a Director of Liz Lake Associates, Chartered Landscape Architects and Urban Designers (LLA). I have a degree and a Diploma in Landscape Architecture from Greenwich University and I am a Chartered Member of the Landscape Institute (CMLI).
- 1.1.2 I have worked in professional practice since 1996. During this time, I have prepared landscape proposals for a range of projects including private landowners, historic landscapes, and educational, commercial and residential developments in town and rural settings.
- 1.1.3 I have prepared Landscape and Visual Impact Assessments (LVIAs) to accompany planning applications for a range of projects including residential, leisure and recreation, commercial and enabling development. I have also prepared the landscape and visual assessments required for the Environmental Impact Assessments of highway and transport infrastructure projects, minerals and waste development, as well as large scale residential and commercial development.
- 1.1.4 I have also acted on behalf of a number of Local Authority clients, including Chelmsford City Council, Welwyn Hatfield Borough Council, South Norfolk District Council, Suffolk County Council, Suffolk Coastal District Council, Maidstone Borough Council and South Cambridgeshire District Council, Cambridgeshire County Council and this Council (WBC).
- 1.1.5 Liz Lake Associates is a multi-disciplinary environmental and design consultancy with over 30 years' experience of master planning, landscape planning, landscape architecture, urban design, heritage and environmental impact assessment. The company is a registered practice of the Landscape Institute.
- 1.1.6 I was appointed by West Berkshire Council in July 2020 to assist the Council with the Landscape Consultation response for the original application, then subsequently

retained to prepare evidence in respect of Landscape and Visual Evidence associated with this appeal.

1.1.7 I declare that the evidence which I have prepared and provide for this Inquiry in this proof of evidence is true. It has been prepared and is given in accordance with the guidance of the Landscape Institute. I confirm that the opinions expressed are my true and professional opinions.

1.2 Scope of Evidence

1.2.1 The outline planning application for the proposed development of;

“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” was refused in November 2020.

1.2.2 In preparing this proof of evidence I have made use of numerous plans and documents prepared by the appellants as part of the original planning application, as well as the Council’s Sandleford Park SPD (CD 8.14) and the up to date Landscape Character Assessment (LCA), 2019 (by LUC) (CD 8.21).

1.2.3 I have assumed that the layout and landscaping proposals shown on the Strategic Landscape and Green Infrastructure Plan and the Design and Access Statement, and other plans are a reasonable indication of the Appellants’ intentions for the site, although I appreciate that the application is in outline.

1.2.4 The application was also classed as EIA development, requiring an ES Chapter (Chapter 7.0) covering Landscape and Visual (effectively an LVIA), written by SLR Consulting for White Peak Planning (but appearing to date from 2017, and part of the previous application (18/00764). The LVIA and its accompanying parts, include Text

(CD 1.7), Figures (CD 1.8) and Appendices, for example tables in Appendix G6 (CD 1.9).

- 1.2.5 My evidence covers the landscape and visual issues associated with the proposed development, together with a review of the effects of the proposals on the intrinsic character and beauty of the landscape and the changes in visual amenity. In this regard, my evidence supports the landscape related reasons for the Council's reasons for refusal, as set out in the Council's Statement of Case (CD 5.1). I recognise that there are various overlapping issues with other experts, such as ecology and trees (dealt with by Susan Deakin and Andrew Giles respectively) and other topics affecting or influencing landscape and visual matters, such as infrastructure and drainage, which I refer to as necessary.
- 1.2.6 The scope of my role for this Inquiry is not to prepare a full LVIA myself, but to provide the equivalent of Landscape Officer advice. However, as part of my role, I have reviewed the design and intentions for the Site, the appellants' LVIA and the judgements made, to determine whether I consider there to be deficiencies, or indeed an underestimation of the harm caused or an overstating of any beneficial effects. During the course of the process, I have provided feedback in the form of,
- A Landscape consultation (CD 2.3)
 - A second ('Wheatcroft') Consultation response (CD 2.4)
- 1.2.7 It is important to emphasise that the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)¹ (CD 17.11) are guidelines to best practice, and the foreword to this publication on page vii, confirms the importance of sound professional judgement and at 2.26 bullet point 5, p22 that "*Professional judgement is a very important part of LVIA*".²
- 1.2.8 Paragraph 2.26, on p22 also states that "*In carrying out an LVIA the landscape professional must always take an independent stance, and fully and transparently*

¹ Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. Pvii. (Core Docs)

² Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. P22. . (Core Docs)

*address both the negative and positive effects of a scheme in a way that is accessible and reliable for all parties concerned”.*³

1.2.9

I have undertaken a number of Site visits, including to the surrounding area of the Site, during 2020 and 2021.

³ Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. P22. . (Core Docs)

2 POLICY CONTEXT RELEVANT TO THIS APPEAL

2.1 Introduction

2.1.1 I have set out the local policy context here for reference purposes in so far as it relates to the landscape and visual issues. Niko Grigoropoulos is dealing with planning policy and the planning balance in the light of my evidence.

2.2 National Planning Policy Framework (NPPF)

2.2.1 A number of key policies that form part of the NPPF are of particular relevance in landscape and visual terms, as follows:

Achieving Sustainable Development (Paragraph 8)

2.2.2 There are three dimensions to sustainable development: economic, social and environmental:

“An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment....”⁴

Achieving Well-designed places (Paragraph 127).

2.2.3 A number of planning principles are stated, and these include the following:

- *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

⁴ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”⁵*

Conserving and enhancing the natural environment (Paragraph 170)

2.2.4

Several planning principles associated with conserving and enhancing the natural environment are stated, and these include the following:

- *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*

⁵ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

- *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”⁶*

Conserving and enhancing the natural environment (Paragraph 171)

“Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.”

2.2.5

The NPPF also notes in paragraph 180:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

⁶ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

- a) *mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”*⁷

Conserving and enhancing the historic environment (Paragraph 185)

2.2.6

Plans should enable a positive approach to the conservation and enjoyment of heritage assets which are often exposed to neglect, decay and other threats, plans should consider:

- *“the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.”*⁸

Proposals affecting heritage assets (Paragraph 192)

2.2.7

In determining applications, local planning authorities should take account of:

*“.....c) the desirability of new development making a positive contribution to local character and distinctiveness.”*⁹

⁷ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

⁸ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

⁹ National Planning Policy Framework (NPPF), available online at : <https://www.gov.uk/guidance/national-planning-policy-framework>

2.3 Planning Practice Guidance (PPG)

2.3.1 This is an online resource. References are correct as at the date of this Proof although I recognise that it may be updated from time to time, especially in light of the recent changes to the NPPF.

2.3.2 Paragraph ID-08-001 of the Planning Practice Guidance on Landscape makes reference to the core principles of the National Planning Policy Framework (NPPF) as follows:

“One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside”.

2.3.3 Paragraph ID-26-002 explains that good design should *“enhance the quality buildings and spaces, by considering amongst other things form and function; efficiency and effectiveness and their impact on well-being”.*

2.3.4 Paragraph ID-26-007 Local Character (including landscape setting) emphasises the importance that should be placed on character and local distinctiveness:

- *“Development should seek to promote character in townscape and landscape by responding to and reinforcing locally distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation”.*
- *“The successful integration of all forms of new development with their surrounding context is an important design objective, irrespective of whether a site lies on the urban fringe or at the heart of a town centre”.*
- *“When thinking about new development the site’s land form should be taken into account. Natural features and local heritage resources can help give shape to a development and integrate it into the wider area, reinforce and sustain local distinctiveness, reduce its impact on nature and contribute to a sense of place.*

Views into and out of larger sites should also be carefully considered from the start of the design process.

- 2.3.5 Paragraph ID-26-008 indicates that: *“Development proposals should promote accessibility and safe local routes by making places that connect appropriately with each other and are easy to move through...”*

2.4 Local Policies

- 2.4.1 The Development Plan for West Berkshire is made up of a number of different documents. The policies within these as relevant to landscape and visual issues related to this appeal are outlined below for reference.

West Berkshire Core Strategy Development Plan Document (WBCS DBD), adopted July 2012 (CD 8.5)

- 2.4.2 The Spatial Strategy includes Area Delivery Plan Policy 2 (ADPP2) for Newbury, whilst Core Policies comprise CS3 relating specifically to Sandleford Park, the Sandleford Strategic Site Allocation (SSSA). The policy has several sub parts. The ‘green infrastructure’ section reads,

A network of green infrastructure to be provided which will:

- *conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;*
- *mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements;*
- *provide a country park or equivalent area of public open space in the southern part of the site;*
- *and respect the landscape significance of the site on the A339 approach road into Newbury”.*

- 2.4.3 In addition, supporting notes confirm,
“5.16 The development would need to be designed with significant green infrastructure, taking account of the site’s location, topography, and landscape

importance. The site is located within the Greenham and Crookham Plateau Biodiversity Opportunity Area and will be expected to deliver strategic biodiversity enhancements in line with Policy CS17. It is also close to the Greenham and Crookham Common SSSI which supports a range of important species, including ground nesting birds, which are particularly sensitive to disturbance and will be expected to mitigate against increased recreational pressure. Sandlesford Park has the potential to form a high quality southern gateway to Newbury.”

“5.17 The formation of a country park or equivalent area of public open space in the southern part of the site will protect that sensitive landscape area in perpetuity, as well as protecting the registered historic landscape and setting of the former Sandlesford Priory, a Grade I listed building. It will also protect the views when approaching Newbury along the A339”.

2.4.4

Policy CS14: Design Principles

“Design Principles

New development must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area and makes a positive contribution to the quality of life in West Berkshire. Good design relates not only to the appearance of a development, but the way in which it functions. Considerations of design and layout must be informed by the wider context, having regard not just to the immediate area, but to the wider locality. Development shall contribute positively to local distinctiveness and sense of place.

Development proposals will be expected to:

- Create safe environments, addressing crime prevention and community safety.*
- Make good provision for access by all transport modes.*
- Ensure environments are accessible to all and give priority to pedestrian and cycle access providing linkages and integration with surrounding uses and open spaces.*

- *Make efficient use of land whilst respecting the density, character, landscape and biodiversity of the surrounding area.*
- *Consider opportunities for a mix of uses, buildings and landscaping.*
- *Consider opportunities for public art.*
- *Conserve and enhance the historic and cultural assets of West Berkshire.*
- *Provide, conserve and enhance biodiversity and create linkages between green spaces and wildlife corridors.*
- *Make a clear distinction between public and private spaces and enhance the public realm...¹⁰*

2.4.5

Policy CS 17: Biodiversity

“Biodiversity and Geodiversity

Biodiversity and geodiversity assets across West Berkshire will be conserved and enhanced.

Habitats designated or proposed for designation as important for biodiversity or geodiversity at an international or national level or which support protected, rare or endangered species, will be protected and enhanced. The degree of protection given will be appropriate to the status of the site or species in terms of its international or national importance.

Development which may harm, either directly or indirectly,

- *locally designated sites (Local Wildlife Sites and Local Geological Sites), or*
- *habitats or species of principal importance for the purpose of conserving biodiversity, or*

¹⁰ P.83, WBCS Adopted 2012

- *the integrity or continuity of landscape features of major importance for wild flora and fauna will only be permitted if there are no reasonable alternatives and there are clear demonstrable social or economic benefits of regional or national importance that outweigh the need to safeguard the site or species and that adequate compensation and mitigation measures are provided when damage to biodiversity/geodiversity interests are unavoidable.*

In order to conserve and enhance the environmental capacity of the District, all new development should maximise opportunities to achieve net gains in biodiversity and geodiversity in accordance with the Berkshire Biodiversity Action Plan and the Berkshire Local Geodiversity Action Plan. Opportunities will be taken to create links between natural habitats and, in particular, strategic opportunities for biodiversity improvement will be actively pursued within the Biodiversity Opportunity Areas identified on the Proposals Map in accordance with the Berkshire Biodiversity Action Plan.”

- 2.4.6 At 5.121 the policy refers to Biodiversity Opportunity Areas (BOA), stating that these, *“have been identified by the Berkshire Nature Conservation Forum and agreed by the South East England Biodiversity Forum (SEEBF)(90). There are 17 which have currently been identified, either whole or in part, across the District (see 'Appendix E: Biodiversity Opportunity Areas'). BOAs do not represent a statutory designation or a constraint upon development, rather, they are the areas where biodiversity improvements are likely to have the most beneficial results at a strategic scale. The Council will therefore pursue net gains for biodiversity in and around BOAs and projects which seek to enhance biodiversity within West Berkshire, particularly based on Biodiversity Opportunity Areas, will be supported.”*

- 2.4.7 Policy CS 18: Green Infrastructure

“The District’s green infrastructure will be protected and enhanced. The Council will work with partners, including Parish Councils and the community to address the District’s green infrastructure needs and deficiencies as set out in the forthcoming Green Infrastructure SPD.

New developments will make provision for high quality and multifunctional open spaces of appropriate size and will also provide links to the existing green infrastructure network. Specific standards for provision within new development will be identified in the Site Allocations and Delivery DPD and through the master planning for strategic sites.

Developments resulting in the loss of green infrastructure or harm to its use or enjoyment by the public will not be permitted. Where exceptionally it is agreed that an area of green infrastructure can be lost a new one of equal or greater size and standard will be required to be provided in an accessible location close by.”¹¹

2.4.8

At paragraph 5.123 reads,

“...West Berkshire is generally well provided for in terms of green infrastructure, and it will be important to protect and increase this provision in the future, to meet the future needs associated with new development. The overall strategy for green infrastructure in the District is for:

- the protection and enhancement of existing green infrastructure;*
- and the creation of new green infrastructure and links to better connect green infrastructure”.*

2.4.9

At paragraph 5.125, the policy identifies the reasons for protecting Green Infrastructure (GI), it states,

“The multi-functional nature of GI in the District is important for many reasons. It contributes significantly to the quality of life for residents, workers and visitors, in terms of both visual amenity and for sport and recreation purposes. GI creates a sense of place allowing for greater appreciation of valuable landscapes and cultural heritage. It increases access to the countryside and supports healthy living.....

¹¹ P.92 WBCS Adopted 2012

....It contributes significantly to the conservation and enhancement of biodiversity by creating an ecological network allowing for the movement of wildlife along corridors, and facilitating the colonisation of new areas”.

2.4.10

At 5.137 it states,

“It is essential that new development should help sustain and/or create landscapes with a strong sense of place and local identity and this is another key element of the policy. The policy will protect and enhance this diversity and local distinctiveness through the use of Landscape Character Assessment (LCA) rather than through the use of local landscape designations. This provides the framework for informed decisions to be made as to whether different landscapes should evolve by:

- Conserving the existing and historic character;*
- Enhancing existing character by introducing new features into the landscape;*
- Strengthening or restoring a previous character;*
- or Creating a new character when a sense of place and local distinctiveness have been eroded or lost.”*

2.4.11

Policy CS19: Historic Environment and Landscape Character

“In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole. In adopting this holistic approach, particular regard will be given to:

- a) The sensitivity of the area to change.*
- b) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.*
- c) The conservation and, where appropriate, enhancement of heritage assets and their settings (including those designations identified in Box 1).*
- d) Accessibility to and participation in the historic environment by the local community.*

Proposals for development should be informed by and respond to:

- a) *The distinctive character areas and key characteristics identified in relevant landscape character assessments including Historic Landscape Characterisation for West Berkshire and Historic Environment Character Zoning for West Berkshire.*
- b) *Features identified in various settlement character studies including Quality Design - West Berkshire Supplementary Planning Document, the Newbury Historic Character Study, Conservation Area Appraisals and community planning documents which have been adopted by the Council such as Parish Plans and Town and Village Design Statements.*
- c) *The nature of and the potential for heritage assets identified through the Historic Environment Record for West Berkshire and the extent of their significance.”¹²*

Box 1 reads, "*Historic environment designations in West Berkshire*

- *52 Conservation Areas*
- *Approximately 1900 Listed Buildings*
- *Approximately 90 Scheduled Monuments*
- *12 Historic Parks and Gardens - 3 of which, Aldermaston Court, Sandleford Priory and Shaw House, are currently on the English Heritage Register of ‘Heritage at Risk’*
- *1 Registered Battlefield, Newbury 1 (1643) - currently on the English Heritage Register of ‘Heritage at Risk’*
- *Over 5000 other heritage assets recorded in the Historic Environment Record”¹³*

¹² P.97 WBCS

¹³ P.98 WBCS

It is also made clear at paragraph 5.137 that in relation to new development;

“It is essential that new development should help sustain and/or create landscapes with a strong sense of place and local identity and this is another key element of the policy. The policy will protect and enhance this diversity and local distinctiveness through the use of Landscape Character Assessment (LCA) rather than through the use of local landscape designations. This provides the framework for informed decisions to be made as to whether different landscapes should evolve by: Conserving the existing and historic character; Enhancing existing character by introducing new features into the landscape; Strengthening or restoring a previous character; or Creating a new character when a sense of place and local distinctiveness have been eroded or lost”.

West Berkshire Local Plan Housing Site Allocations DPD 2006-2026 (Adopted, May 2017)

2.4.12

Policy C1: Location of New Housing in the Countryside

“Location of New Housing in the Countryside: *There is a presumption in favour of development and redevelopment within the settlement boundaries of the following settlements: ...*

There will be a presumption against new residential development outside of the settlement boundaries....

....Planning permission will not be granted where a proposal harms or undermines the existing relationship of the settlement within the open countryside, where it does not contribute to the character and distinctiveness of a rural area, including the natural beauty of the AONB or where development would have an adverse cumulative impact on the environment or highway safety.”¹⁴

West Berkshire Local Plan Review 2020-2037: Emerging Draft, December 2020 (CD 8.13)

¹⁴ P.84 WBCS Housing Site Allocations DPD (2006-2026)

2.4.13

Emerging Policy SP8 regarding landscape character recognises the ever evolving approach to landscapes (especially those without formal designation) in the district, and states,

“Policy SP 8 Landscape Character Landscape led development which conserves and enhances the diversity and local distinctiveness of the landscape character of the District will be supported. The natural, cultural, and perceptual components of the character of the landscape will be considered as a whole.

Particular regard will be given to:

a) Its valued features and qualities

b) The sensitivity and capacity of the area to change

c) Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character.

Development should be demonstrably informed by and respond positively to the evaluation of the distinctive landscape character areas set out in the West Berkshire Landscape Character Assessment (2019) and other relevant landscape character assessments. Proposals for development should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA. The level of information provided should be proportionate to the scale and nature of the development proposed but should be sufficient to allow an informed assessment of the potential landscape and visual effects of the proposed development. The assessment should demonstrably inform the detailed design of the development, including its layout, form, scale and appearance in accordance with policy SP7”.

2.4.14

The supporting text to the emerging policy is clear,

“5.31 Conserving and enhancing the distinctive landscape character of the District is given considerable weight in line with national policy which sets out that valued landscapes should be protected in a manner commensurate with their statutory status or identified quality in the development plan”.

“5.33 A landscape does not have to have a designation to be valued locally”.

“5.34 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. The West Berkshire Landscape Character Assessment 2019 evaluates and provides an understanding of what is important and why, for each identified local landscape character area across the District. It provides a framework for informed decisions to be made as to whether different landscapes should evolve by: Conserving the existing and historic character; Enhancing existing character by introducing new features into the landscape; Strengthening or restoring a previous character; or Creating a new character when a sense of place and local distinctiveness have been eroded or lost”.

“5.35 In addition, Historic Landscape Characterisation (2007) and Historic Environment Character Zoning, which provide a sound understanding of the historic environment context of West Berkshire can also be used by the Council to inform and support planning decisions”.

3.1 Character Area Profiles

3.1.1 The LVIA undertaken on behalf of the Appellants (CD 1.7-1.9) set out the Landscape Character Assessments as far as they were relevant up to the point at which the LVIA was written for the previous submissions in 2016 and 2018, and as set out in 7.4.2 of the baseline sections of the LVIA, incorporating old assessments, such as the 2003 LUC Assessment for Berkshire or the 1999 Newbury document; however, things have moved on and this assessment which was adopted by the Council in autumn 2019 (CD 8.21) and brings things up to date and supersedes the old documents, which are no longer on the Council website. The latest assessment clarifies (Appendix 1) that,

“This assessment builds upon the existing local authority scale assessments from 1993 and 2003 as well as the 2002 North Wessex Downs AONB Landscape Character Assessment (which covers 74% of the District). The West Berkshire Landscape Character Assessment supersedes both the Newbury District Landscape Assessment (1993) and Berkshire Landscape Character Assessment (2003) but continues to sit alongside the North Wessex Downs AONB Landscape Character Assessment (2002) which covers a broader area”.

3.1.2 Furthermore, LUC set out some of the updates and trends that have evolved in Landscape Character Assessment that have taken place since 1993 including the following referred to in the report and,

Section 1.6 (p. 2): *“It also seeks to identify and explain the unique combination of features and attributes (characteristics) that make different landscape distinctive. The landscape is the result of the interaction between people and the environment that gives an area a local identity”.*

Section 1.7 (p. 2): *“The process of Landscape Character Assessment is described in “An Approach to Landscape Character Assessment” (Natural England, October 2014)”.*

Section 1.8 (p. 2): *“Understanding the character of place and evaluating an area’s defining characteristics is a key component in managing growth sustainably and ensuring that the inherent qualities of West Berkshire’s landscape can continue to be appreciated. Understanding of character can be used to ensure that any change or development does not undermine whatever is valued or characteristic in a particular landscape”.*

3.2 West Berkshire Landscape Character Assessment, 2019 (CD 8.21)

3.2.1 The Site is identified within recently adopted West Berkshire Landscape Character Assessment (2019), which supersedes previous assessments. The Site is situated within Landscape Type WH: Woodland and Heathland Mosaic. Within this the Site falls into sub-area WH2: Greenham Woodland and Heathland Mosaic.

“The area, which lies to the east of the southern part of Newbury and extends towards Brimpton, is defined by gentle undulating slopes, which rise to the flat-topped Greenham and Crookham Common. This is a large expanse of recovering heathland (common land), and is surrounded by valley woodlands. The western area, around the Common, has been greatly influenced by the former airbase. The eastern part of the character area around Brimpton and Crookham is distinguished by the presence of a mix of arable and pasture contained by a network of woodlands”.

“The area is bounded by the river Enborne to the east and south, which also marks the District boundary with Basingstoke and Deane. Newbury delineates the western boundary, with the river Kennet Valley marking the northern boundary. Boundaries of the LCA are principally determined by geology and topography relating to the sand and gravel on clay and the rising slopes above the valleys”.

Key Characteristics

3.2.2 The key landscape characteristics include:

- ***“1) Gently undulating slopes leading to flat-topped ridge at Greenham and Crookham Common: ...The plateau edge is relatively clearly defined by gentle slopes and wooded gullies, which descend through sandy Bagshot Beds to London Clay in the lowest valley bottoms.***

- **2. Presence of surface water and small streams running parallel to ridges:** A direct consequence of the underlying geological and soil conditions is the presence of surface water due to impeded drainage caused by the subsurface pan of the podsols and low permeability of the clay. These conditions have resulted in the presence of surface springs at the interface with the clay and a highly divided network of small streams draining to the River Kennet to the north and River Enborne to the south.
- **3. Large open expanse of heathland, surrounded by woodland:**Surrounding the plateau are areas more typical of this landscape type, consisting of large, predominantly deciduous woodlands which form a regular pattern of linear ghyll woodlands in undulating wet gullies leading down to the Kennet and Enborne Valleys. Between these woods there is a mosaic of arable and pastoral land use”.
- **“5. Scattered dispersed settlements, separated by expanses of woodland and heathland in the west:** Greenham lies very close to the edge of Newbury in the west, creating a more suburban character.”
- **“6. An accessible landscape of open access land and rights of way:** There are extensive areas of Open Access land on the Common, linked to a network of footpaths. The area is used extensively for leisure activities..”.
- **“7. Open views from the plateau:** Greenham Common provides views over the valleys to the north and south”.

3.2.3

The section now includes a section on the **Historical and Cultural Evolution** of the landscape which includes,

“...Historically the majority of fields were sited on the less undulating areas between dry valleys and were irregular in shape. Most had been enclosed by the start of the 18th century. The settlements along the Enborne were supported by a mix of assart fields and a strip of enclosed riverside meadows, while most woodland areas were ancient or semi-natural. ...”.

“Parklands are present in a few locations including Crookham House, and the more substantial Sandleford Park, which was an Augustinian priory until the dissolution of

the monasteries. Sandlesford Priory itself is a Grade I Listed Building; an important surviving 14th century house remodelled in the late 18th Century; it is now used as a school. Capability Brown was involved in the design of the parkland, which is now a Registered Park and Garden. The land west of the A339 remains rural in character and combines blocks of ancient woodland, some uncommon types of pre-18th century fields, and the degraded remains of the western part of Sandlesford Park”.

3.2.4 The Assessment includes the most important **Natural Landscape and Priority Habitat** features as follows,

“There are also multiple areas of ancient woodland located on the slopes of the plateau, many of which are designated as ancient woodland, Local Wildlife Sites, and one SSSI at Bowdown and Chamberhouse Woods”.

Valued Features and Qualities

3.2.5 The LCA contains numerous valued features and qualities,

- ***“1. Extensive heathland, acid grassland and woodland:*** *The open expanse of heathland and acid grassland on Greenham Common combined with ancient woodland and linear ghyll woodlands create important habitats, with the heathland important for rare ground-nesting birds”.*
- ***“2. Scenic and open views from the plateau:*** *Sandlesford 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:*** *.....Sandlesford Priory and parkland are also important parts of the historic environment in this area, evidence of time-depth beyond the military intervention”.*
- ***4. Recreational value:*** *..... publicly accessible and used extensively for recreation and leisure by the local communities”.*
- ***“5. Tapestry of agricultural land:*** *The pattern of fields, woodland and commons separating settlements can give individual settlements an intimate and secluded feel, contrasting with the open nature of the Common”.*

- 3.2.6 The LCA contains specific detractors, which include development pressure (future development associated with Sandleford Park in particular is highlighted), loss and decline of hedgerow boundaries and mature hedgerow trees has reduced the variety and scale of the landscape in some areas, changing land use patterns resulting in gradual loss of landscape variation and biodiversity, as well as recreational pressure.
- 3.2.7 The assessment includes a Landscape Strategy which comprises the following, discussed later in this proof,
- *“Restoration of heathland.*
 - *Retain and enhance open views.*
 - *Conserve and strengthen existing boundary elements.*
 - *Promote appropriate woodland management.*
 - *Balance recreational pressures.*
 - *Ensure integration of new development into the landscape.*
 - *Conserve the strong time-depth experienced in the landscape”.*

3.3 West Berkshire Landscape Sensitivity Study, 2009 (CD 8.22 and 17.8)

- 3.3.1 The summary findings of the Sandleford Park study as part of ‘*An Integrated Landscape Sensitivity Approach to Settlement Expansion within West Berkshire*’, April 2009 looked at potential strategic development sites and concluded that no further large scale developments should be located in this area and that development should be smaller scale, where closely related to the settlement edge (page 1,2 and Figure 3a of the Potential Strategic Development Sites (CD 17.8)).

“AREA 3: SANDLEFORD PARK

Local landscape character area 18D. The majority of the LLCA would be affected by this site selection. The overall sensitivity of this area is medium, with a medium to high wider landscape sensitivity. It is significantly affected visually by development on the higher ground within it and just outside, but retains elements of seclusion within the valleys, and woodland blocks some near views. Further development on the

higher ground could be highly visible both on the approaches to Newbury and from further away to the south, while development on the lower ground would have a significant impact on the remaining areas of seclusion. The complex topography in the centre of the area would be difficult to develop without having significant local landscape impact.

Recommendation: *no further large scale developments should be located in this area, though some smaller scale development might be able to be accommodated where closely related to the settlement edge, in association with new woodland edge planting*.

[underlining added]

3.3.2 In respect of the adjacent Area 2, The Enborne Valley (which is the western part of the SSSA) the report similarly concluded,

Recommendation: *any large scale development would subsume Enborne Row within Newbury and would have significant landscape impacts and is therefore not recommended*".

3.3.3 In relation to sensitivity of the site, the LVIA mentions the key presence of landscape sensitivity interests but focuses on elements either beyond the site or beyond the LCA itself (e.g. retail park to the north east of A339); and at the same time failing to take into account the other factors such as the more scattered nature of small incremental change like the rugby club, or the college, which contrast with the suburban and residential area of the town to the north (of Monks Lane). Meanwhile, the conservation value associated with Ancient Woodland and Wildlife Designations, the nature of recreational access, as well as the high cultural sensitivity, which all influence value is not mentioned.

3.4 Newbury Town Design Statement, 2017 (CD 8.24)

3.4.1 The Town Design Statement (TDS) was adopted by WBC in 2018 and forms a material consideration in development control; however, it is not reviewed in the LVIA despite providing important references to the town's character areas and the setting of Newbury to the south (The Appeal Site) where,

“The town of Newbury is built on both sides of the River Kennet and the two plateaux which rise about 20 metres..... Two miles to the south at Wash Common the land falls away to the River Enborne. Parts of the residential suburbs of Wash Common are at 120m above sea level..... adding visual relief to the urban environment and provides welcome recreational areas surprisingly near the town centre..... The suburb of Wash Common stretches some two miles from the centre along Andover Road and is backed by farmland on both sides....”. (section 3: landscape setting, p.8).

3.4.2 Of Wash Common, Wikipedia states,

*“**Wash Common** is a small suburb to the south of Newbury, Berkshire. It is built on the former Newbury Wash, which was flat open heathland overlooking Newbury, and until the 19th century there was just a small group of houses separated from Newbury by open country. Both places have grown into each other, and the suburb of Wash Common is now contiguous with Newbury. Most housing development has taken place to the west of the Andover road, and some of the area to the east of the road still remains open farmland”*.

[underlining added]

3.4.3 Section 4.7 of the Town Design Statement concerns the ‘South and City’, including the Monks Lane Character Area, where it is acknowledged that the prospect of 2,000 new homes will have a *“dramatic effect on the character of this part of Newbury”*, a location that has key characteristics of,

- *“An edge of town road with full residential development on the north side and with Newbury College, a modern Doctor’s Surgery and the Rugby Club on the south side.*
- *Despite these urban influences the area has a semi-rural character with native hedging on the south boundary and with open countryside and many mature trees beyond.*
- *Detached properties, mainly of individual design set in well established gardens continuing the ‘garden suburbs’ off the Andover Road.*

- *The possibilities for the enhancement of the setting of the area around the junction of Monk's Lane and Newtown Road.*"

3.4.4

The recommended Design Guidelines for Monks Lane are,

- *Any future development should conserve the semi-rural character of Monks Lane.*
- *Any future development should conserve the character, setting and symmetry of the 1930's homes at the eastern end of Monks Lane.*
- *Where possible, opportunities should be taken to enhance the setting around the junction of Monks Lane and Newtown Road to reflect its role as a gateway into the town from the south."*

3.4.5

The summary section identifies eleven overarching key principles for the whole town as follows,

- *"2. Likewise views into and out of the rural edges of the town should be conserved and new development should blend into the existing landscape....*
- *4. New development into the town should seek to conserve existing wildlife and their habitats and where possible enhance them.*
- *5. Trees for an important aspect of the urban environment – mature specimens should be retained wherever possible within new developments, which should include appropriate planting schemes.*
- *6. Gateway road into the Town attracted prosperous suburban housing with large gardens early on in its expansion and now these irreplaceable 'garden suburbs' enhance the approach roads into the Town for all to enjoy. Any future development should respect the role they play as gateways into Newbury.*
- *7. Similarly, other localities which are most frequently seen and remembered – such as the environment of schools and parks – should be kept pleasing to the eye...*

- 9. Views out to the countryside from hilltop residential areas should be conserved and enhanced”.

3.5 Historic Landscape

3.5.1 In addition to the presence of a mosaic landscape, consisting of ancient woodland, woodland, grassland, watercourses and undulating landform with streams, which contribute to character, further depth is set out in relation to other documents below.

3.5.2 Historic England’s listing¹⁵ in relation to the parkland (CD 17.9) (a large portion of the Appeal Site itself) to the west of the A339, includes reference to the historic western approach to Sandlesford Priory, off Andover Road (along Warren Road) stating,

“The setting is partly urban, with the southern extremity of Newbury close by to the north, and agricultural, with the former western parkland (Conveyance map, 1871) lying adjacent to the west of the A34. The latter area contains a former drive, now a track, which gave access from the A343 Andover road (OS 1882)”.

“A further, west, drive (possibly on the course of an earlier track) appears to have entered the former west park 3km west of the house, set some way back off the A343 Newbury to Andover road, the entrance marked by Park Cottage, a two-storey rendered cottage standing adjacent to the drive. The drive, still extant as a track and public footpath, curves across a plateau through what is now open agricultural land bounded by woodlands, dropping from the north-east corner of Gorse Covert (formerly Waterleaze Copse, OS 1882) down the hillside towards the house, from which hillside the west front and south park are prominent in views east”.

[Note: Park Cottage is location on Warren Road]

3.5.3 It is considered that the historic importance of the western parkland and the estate’s western drive, should not be overlooked by the appellants approach to this development, these contributions are not mentioned to any great degree in the baseline of the LVIA, which simply appear to try and rebut the influence of Capability

¹⁵ www ref: [SANDLESFORD PRIORY, Greenham - 1000333 | Historic England](#)

Brown or the Registered Park and Garden, which lies adjacent. This should not diminish the contribution of the historic western parkland (and which does not have an urban setting) and its key features forming both the setting of Sandleford Priory and the southern setting of the town, heightening the value and sensitivity of the Appeal Site.

- 3.5.4 The Historic Environment Character Zone (HECZ) for the Newbury Fringe South¹⁶ (NFS) (CD 17.10) does highlight the western parkland, and the sensitive nature of the landscape here to change, as well as recognising the likely negative consequences of limited unofficial recreational activity – however, it remains to be seen the potential consequences of actively promoting recreation in the context of pressure arising through an additional 1000 new homes in the same area,

“The land west of the A339 remains rural in character and combines blocks of ancient woodland, some uncommon types of pre-18th century fields, and the degraded remains of the western part of Sandleford Park. This is a zone with a high probability of change, either through development or by further degradation of woods and boundary features via unofficial recreational uses”.

“Area 3 of the evaluation found ditches by the stream between High Wood and Dirty Ground Copse that were interpreted as drainage channels and may be related to landscaping within the park in the 18th and 19th centuries”.

- 3.5.5 One of the future issues the historic environment has to contend with is,

“There is continued development pressure in the zone, much of it unsympathetic in scale and design. This could lead to further erosion of the historic character”.

3.6 Associations through literature

“The primroses were over. Towards the edge of the wood, where the ground became open and sloped down to an old fence and a brambly ditch beyond, only a few fading patches of pale yellow still showed among the dog’s mercury and oak tree roots. On

¹⁶ [HECZ\(N\) NFS Newbury Fringe South \(westberks.gov.uk\)](https://www.westberks.gov.uk)

the other side of the fence, the upper part of the field was full of rabbit holes. In places the grass was gone altogether and everywhere there were clusters of dry droppings, through which nothing but the ragwort would grow. A hundred yards away, at the bottom of the slope, ran the brook, no more than three feet wide, half choked with king-cups, water cress and blue brook-lime. The cart track crossed by a brick culvert and climbed the opposite slope to a five-barred gate in the thorn hedge. The gate led into the lane”.

- 3.6.1 This is the opening paragraph of Richard Adam’s book ‘Watership Down’ and is describing the Appeal Site; including the shallow valley between Barn Copse and Slocketts Copse, where the watercourse runs down the ‘central valley’ to the parkland track’s culvert at the edge of Waterleaze Copse and towards the River Enborne. Indeed, Adam’s book comes with a map (refer to Appendix A), showing the real life locations he brought to life in some detail, including the Appeal Site which is marked ‘1’ in the book’s accompanying map.
- 3.6.2 The locations described in the book also form part of a well-documented ‘Watership Down Walk’¹⁷ (refer to ‘All Trails’ route in Appendix A), where the online route markers refer to the text quoted from the book (including the extract I have repeated above, which relates directly to the Appeal Site in the vicinity of marker point no.1). The walk summary describes the overall experience as,
- “A walking trail through the setting of Richard Adams' famous novel, Watership Down. Begin in Newbury, and follow the book through Newtown Common, Ecchinswell, Overton and Whitchurch. You'll see Sandleford Warren, the Enborne River, Nuthanger Farm, Watership Down, Efrafa, the Railway Arch, and the grave of Richard Adams himself”.*
- 3.6.3 GLVIA3 (CD 17.11) Box 5.1, incorporates ‘Association’ as one of the key measures contributing to value, one of the elements missing from the LVIA (refer Landscape Effects Table, Part 1). Of Associations, GLVIA states,

¹⁷ [The Watership Down Walk - Berkshire, England | AllTrails](#)

“Some landscapes are associated with particular people, such as artists or writers, or even events in history that contribute to perceptions of the natural beauty of the area”.

3.6.4 More recently, the Landscape Institute further defines Association¹⁸ as,

“Associative: Landscape which is connected with people, events and the arts Associations with literature, art, film and music that contribute to perceptions of the landscape; Links to a notable historical event; Associations with a famous person or people: The arts including literature, photography, painting, film, music; Historical accounts, cultural traditions and folklore. Guidebooks LANDMAP Cultural Landscape Services aspect”.

3.7 Summary

3.7.1 The Appellants have had ample opportunity to upgrade their assessment or provide a technical response, since it was written in 2017, to incorporate changes and updates arising through the advancement of Landscape Character techniques (including the new West Berkshire LCA, as well as other available information that inform the character and sensitivity of the Appeal Site), having been reminded through landscape consultation responses, but no further assessment or technical update has been forthcoming to ensure the LVIA (part of the EIA) is robust.

3.7.2 Accordingly, the Inspector is invited to discount references to old assessments, which have been superseded and are out of date. Unfortunately, such superseded assessments have negatively influenced and informed judgements in the submitted LVIA which relies on 1993 and 2003 documentation. Updated information must be taken account of to ensure that missing contributing factors to the value and sensitivity of the Appeal Site are taken into consideration and to ensure that elements forming part of the design are correctly considered.

¹⁸ The Landscape Institute: GN02/21 Valued Landscapes consultation

4 LANDSCAPE AND VISUAL ISSUES

4.1 Value, Susceptibility and Sensitivity

4.1.1 In establishing the Sensitivity of a Site, it is best practice to establish the value and susceptibility of a Site. Whether the Site forms part of a 'Valued Landscape' for the purposes of paragraph 170 of the NPPF, will have, inter alia, regard to all the factors in Box 5.1 of GLVIA, p.83.

4.1.2 There is no requirement that a 'valued landscape' must also benefit from some kind of landscape designation. It is also clearly stated in paragraph 5.26 of GLVIA3 that;

"The fact that an area of landscape is not designated either nationally or locally does not mean that it does not have any value.... The European Landscape Convention promotes the need to take account of all landscapes, with less emphasis on the special and more recognition that ordinary landscapes also have their value, supported by the landscape character approach."

4.1.3 The LVIA (Appendix G6 Table) does not incorporate all relevant factors in relation to value as set out by Box 5.1 (quality, scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and associations) and has not been carried out fully, resulting in an under assessment of Value attributes.

4.1.4 Part of the approach for LVIA is the consideration of susceptibility for the proposed development itself, which in GLVIA3 glossary is stated as being;

"the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies".

4.1.5 In the following sections I set out my review of the appellants' approach to Value, Susceptibility and Sensitivity.

4.2 Landscape Baseline

Landscape Effects Table – Part1 Landscape Baseline and Sensitivity (refer ES Appendix G6) (CD 1.9)

- 4.2.1 Part 1 of the Landscape Effects Table assessment relates to Value, Susceptibility and Sensitivity. Part 2 assessment is considered later in this proof, following further consideration of the design matters, including some of the points raised in two consultation responses.
- 4.2.2 Whilst some of the Part 1 assessment has sought to introduce some of the superseded elements from old LCAs into the assessment, these should be ignored. In addition, the omission of settlement edge character review or identification of the effects associated with the townscape interface of the site with Monks Lane is unfortunate.
- 4.2.3 The Appellants have also introduced their own Local LCAs (Landscape Character Compartments (LCCs)) forming part of Appendix G2 analysis. Whilst the various compartments have been individually appraised, some elements are also assessed individually to inform Part 1 Baseline and Sensitivity, and then drawn back together later for the Part 2.
- 4.2.4 In relation to the **LCC Northern and Western Part**, the Part 1 dilutes the very essence of the area to help produce a reduced scoring assessment (Low to Medium Agricultural Fields), yet it is inherently described as a mosaic, or pattern in the LCA's landscape, and this is clearly recognised when on the Appeal Site. The Woodland parcels' High Sensitivity is maintained, even at or close to the settlement edge; however, the Agricultural fields somehow over dilute the scoring due to their perceived influence / proximity to the settlement edge to provide Low to Medium Sensitivity; accordingly, I find that both areas are under assessed.
- 4.2.5 Additionally, I find that area 3b (within the Appeal Site, as this is not a comprehensive development of the SSSA) and contrasts with 3a in so far as it does not lie adjacent to any built edge or form and is not influenced by the settlement edge, it does not have low scenic quality, there are no paddocks, potential view towards the rugby club light columns is only afforded via a gap that is otherwise screened by woodland (Dirty

Ground Copse and Barn Copse), it is more tranquil with no traffic, there are a high number of PRow users (as identified in the visual baseline table (App G6). Thus, I conclude the area 3b overall has an altogether Higher Value, a Higher Susceptibility to change and a Higher Sensitivity to change than 3a - yet, this is not acknowledged in the LVIA despite forming a large zone of proposed development.

- 4.2.6 In relation to the **LCC Southern and Eastern Parts and Valley Corridor**, I concur with the assessment of High Value, High Susceptibility and High Sensitivity.
- 4.2.7 In relation to the superseded LCAH2: Greenham [which should be **WH2: Greenham Woodland and Heathland Mosaic**], and the Appellants having diluted their findings of individual LCCs above, when the Value of the LCCs elements is correctly combined to represent the intricate mosaic of this landscape (i.e. Woodland – High, Agricultural Fields of no less than Medium and portions of Valley Corridor grasslands - High), the assessment of Value would be no less than Medium-High. Combined with my findings of Medium-High Susceptibility above, I conclude that the Sensitivity of this part of the LCA to be no less than Medium-High.
- 4.2.8 In relation to the adjacent **LCA of UV4: Enborne Upper Valley** [corrected from the superseded LCA A4 Enborne], I disagree with the assessment of Medium to High Value and Sensitivity – the LCC sheet 2h, which informs this assessment shows this to be of both High Value and High Sensitivity (as it is consistently for all the other woodland blocks). Another discrepancy is the stated opportunity for “..recreational access” into Waterleaze Copse, which would be a concern in relation to its Ancient Woodland status (to ecologists).
- 4.2.9 In relation to the **Monks Lane Fringes** a TCC (Townscape Character Compartment), I have identified the undeveloped section of the road provides a strong character with large individual houses in mature garden to the north side of the road and the rugby club, surgery and college being the only buildings on the south side; there is a significant vegetated stretch of road frontage to the south side, which serves to provide the last remaining gap to the wider landscape, providing a strong semi-rural character which transitions to the countryside beyond, which is apparent due to the open nature of the street frontage and the presence of mature woodland (Crooks Copse) in the foreground, close to the existing settlement edge. I consider the Monks

Lane Fringes TCC has a Medium Value, Medium Susceptibility and Medium Sensitivity to change.

Conclusion

4.2.10 Overall, I have found the Appellants to have under assessed the Value of the Appeal Site to change. The Appeal Site contains many component features, attributes, perceptual aspects, or key characteristics of High Value (the appellants' submission), as well as some that were missed, that when combined form an intrinsically linked pattern or mosaic of undeniable quality. For these reasons I do consider this landscape to be Valued for the purposes of the NPPF; should the Inspector not agree with this, I still invite the Inspector to accept my increased Value of this Site compared to the position of the Appellants.

4.2.11 In addition, I consider the Susceptibility of the Appeal Site to this development of large-scale new housing to be Medium-High adjacent to the settlement edge, but quickly changing to High away from the town. (I acknowledge that Susceptibility would be incrementally lower if this proposal was for a more appropriate smaller or small scale development, as recognised by the conclusions of the Landscape Sensitivity Study, which commented on scale). This is an established landscape (albeit one that has undergone some change adjacent to the settlement edge, but retains semi-rural character) with well-defined characteristics, where only well-considered changes could be accommodated without loss of key characteristics, individual elements or features and specific aesthetic or perceptual aspects or, overall landscape character.

4.3 Visual Baseline

Visual Effects Table – Part1 Baseline and Sensitivity (refer ES Appendix G6) (CD 1.9)

4.3.1 As set out in the Council's Statement of Case, I have reviewed the locations and therefore the Council is satisfied with the visual receptors identified for inclusion in the LVIA.

4.3.2 GLVIA3 (CD 17.11) identifies in para. 6.33 that visual receptors most susceptible to change are residents at home and users of the PRow network resulting in a higher sensitivity of the receptors. GLVIA3 also states at para. 6.33 that travellers on road,

rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change.

4.3.3 Given the above, I disagree with the baseline assessment for Monks Lane (receptor 5), which acknowledges some of the positive characteristics within the view affecting value and susceptibility at the interface between town and countryside). Therefore, I conclude a Moderate Sensitivity for this receptor.

4.3.4 I agree with the Appellants' judgement that the sequential views from the PRow within the site are of High Sensitivity; however, I cannot understand how the value of these views is only recorded as Medium. This should be increased to High as they occur in well recognised locations, where the appreciation by members of the public is especially recognised very close to the town and where the users experience the quality, condition and character of the LLCs identified as High Sensitivity (in landscape terms) when passing through these sensitive areas.

5 DESIGN MATTERS, INCONSISTENCIES AND WHEATCROFT

5.1 Design Matters

5.1.1 This section looks at some of the issues relating to design, some of the inconsistencies in the documentation and the effect of the ‘Wheatcroft’ amendments. A number of these have overlaps with other disciplines (trees, ecology, drainage, transport etc.,) and some were flagged up as part of my consultation responses (in September 2020 and ‘Wheatcroft’ response, February 2021).

- Park House School and Playing Field
- Central Valley Crossings
- Interface with land to the west (known as DNH land)
- Development within Ancient Woodland Buffers
- Monks Lane frontage

I have concentrated the issues down to these key topics and consider each in turn.

Park House School and Playing Field (‘Education Land’)

5.1.2 I have previously raised concerns about the nature of the interface of the proposed development with Park House School as follows,

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Land shown as ‘Education Land’ within the application, forms part of an extension beyond the Site, there is no masterplan detail for that area within this application and therefore there is no justification for the automatic removal of any trees shown on the Barrell Tree Protection Plan (TPP). Until, the school extension is designed in detail, there is no way of knowing the shape or extent of land required (if required) and thus it is premature to seek removal of mature trees, including veteran TPO oak and boundary trees. However, it is recognised that the Planning Statement (LRM</p>	<p>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</p>

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Appendix 3) includes reference to a feasibility study for the school; however, this only shows one way of achieving a particular outcome. It does not, for example, have regard to the effect (or loss of) on important existing combined features (boundary vegetation, veteran tree or Ancient Woodland) or seek to retain them – it appears the plan would cause the removal of a Veteran Tree, historic boundary vegetation and encroach on the Ancient Woodland Buffer. It also does not explore alternative solutions of for example positioning a 90° rotated pitch (north east-south west orientation) at the very south eastern edge of the ‘Education Land’ (or a slight increase in footprint). This highlights the importance of working with a comprehensive approach, and in this regard the lack of coordination between elements has led to a singular outcome and an unnecessary effect on landscape resources. An alternative approach (by repositioning and rotating the pitch) would allow a far superior solution to be developed, with the added benefit of retaining/ protecting important existing features and space to enhance the landscape (and school masterplan) further, providing a greater green infrastructure network with connectivity between the Ancient Woodland (and buffer), retained Veteran Tree and retained historic boundary vegetation, with new connective planting across the school site and minimal impact on adjacent housing numbers.</p>	<p>the removal of any vegetation (historic hedge and trees G36/ G37 along the boundary or T34) that contribute to local character.</p>

5.1.3 At this point in time, whilst the Appellants have helpfully demonstrated that the pitch can be rotated, the total loss of boundary vegetation is still not justified. Many schools have internal boundaries to outlying sports areas that are hedged and this wholesale removal is unnecessary and should not be seen as an opportunity to present a blank canvas. It is unfortunate that the Appellants have not identified a solution that ensures most, if not all, of the boundary is retained with minimised points for access (users and maintenance) using the weakest part of the boundary, ensuring that the most valuable sections of vegetation and trees are not harmed. At the present time, the Landscape Plan/ Green Infrastructure Plans do not outline a strategy to conserve/ enhance any boundary (new or old) of the school with the rest of the development parcel, with adjacent habitat becoming more fragmented.

5.1.4 The outcome of the Wheatcroft consultation does not resolve this matter at the time of writing and does not alter my considerations of the LVIA assessment, although should the vegetation be retained on the boundary then this would be of benefit to the retention of landscape resource features that would otherwise be removed and further fragmented.

Central Valley Crossings

5.1.5 I have previously raised concerns about the nature of the proposed Valley Crossings (of which there are two) as follows,

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Link between Neighbourhood Areas A and B</p> <p>The Core Strategy and Sandleford SPD establish the principle for the creation of a bridge between the western and northern Neighbourhood Areas A and B across the sensitive wetland valley crossing. Any form of crossing will inevitably cause harm to the character and appearance of the valley (and this should be recognised in the LVIA, but has not); however, the SPD specifically requires:</p> <ul style="list-style-type: none"> • “a high-quality low-level bridge” • “...avoid the need for large scale earthworks”. <p>Neither of these fundamental requirements have been addressed in the package, and the proposals offered (Vectos plan VD17562-SK014) are unacceptable in their current form, comprising large scale 1:3 earthwork/ embankments on which to sit a new road with lighting extending out across the whole valley, leaving a narrow culvert through which the existing watercourse would pass. The extent of the construction footprint with embankment toes appears to be approximately c.40-45m width (a direct loss of valley sides/floor), and there are concerns as to the extent of the works in relation to the existing trees at the woodland edge, which are shown to be in conflict on the Vectos plan, but not considered at all in the Barrell Tree/ AIA work. An innovative high-quality design for a bridge perhaps with a sinuous profile would provide a well-considered approach in line with policy (including the CA7 Valley Crossing Development Principles in the SPD), that also allows for the retention of valley trees, the open grassland corridor, which is</p>	<p>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.</p> <p>Main Valley Crossing</p> <p>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,</p>

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>otherwise severed by the incongruous structure currently being proposed.</p> <p>By contrast, the creation of a steeply embanked road creates a physical barrier to public access and renders the footpath accesses within the valley floor shown on the Development Proposals (DAS p.45 and other documents) that converge and towards rear of the Rugby Club/Surgery, and shown as a 'Key Footpath / Cycle Link' on the parameter plan, as unworkable and is therefore an unacceptable proposal. As highlighted in L7 of the SPD (p.36), "The design of the access road across the valley is crucial to maintaining the landscape character of the valley. The views up and down the valley should not be lost and lighting should be kept to a minimum to maintain a dark north/south corridor. It should be designed to respond to the landform and minimise damage to the tree cover on the valley sides".</p> <p>It is recognised that any solution will have some adverse effect on the character and integrity of the open valley corridor; however, a well-considered design will help to lessen the harm caused, rather than the unacceptable approach taken at present, which also severs Barn Copse and isolates part of the valley from the wider area (significantly reducing the green infrastructure connection). Assuming a connection through to the western part of the neighbourhood allocation is still required by the Council then maintaining the integrity, character and connectivity of the historic landscape corridor and the retention of its inherent features and attributes (for example as part of a 'Wetland Corridor' character area, as shown in principle on page 54 DAS) is absolutely fundamental to the achievement of a successful scheme.</p> <p>Furthermore south of Crook's Copse, another bespoke valley crossing solution is required for the same reasons as above (being provided as indicated in principle on p.28 DAS, as one of six 'Crossing Points'), to maintain the integrity of the valley form and to ensure further Ancient Woodland is not cut-off and isolated from the rest of the country parkland, and in line with Green Infrastructure principles of connectivity and NE Standing Advice.</p>	<p>although LRM appear to acknowledge harm at 2.8 and 3.1 and the requirement to comply with the SPD and minimise harm.</p> <p>Crooks Copse Link</p> <p>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.</p>

5.1.6 At this point in time, whilst the appellants have helpfully made some progress with the Main Valley Crossing the issue has not been resolved. I understand that as part of the ‘Wheatcroft’ transport discussions regarding the Main Valley Crossing, this will negate the need for an emergency access through the parkland area, which is considered a more appropriate and less harmful solution in landscape terms.

5.1.7 The outcome of the Wheatcroft consultation does not resolve this matter at the time of writing, and the Inspector is advised that the harmful adverse effects of any scenario of either crossing point have not formed part of the LVIA assessment on the Local Landscape Character Compartments LCC1a and LCC1b, as I will demonstrate below.

Interface with land to the west (known as DNH land)

5.1.8 I have previously raised concerns about the position of the access point for ‘All Traffic Modes’ as follows,

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Furthermore, the proposed access point for ‘All Traffic Modes’ does not appear to be in the best place along the western boundary (of the western Neighbourhood Area), for such a wide strategic route – the Barrell TPP plan does not identify any specific tree removal, although from an on Site review it appears inevitable that the selected position will sever the boundary and likely require the removal of tree(s) (possibly trees that have since grown post survey); however, there appears to be better access elsewhere to a thinner less constrained section with no trees, along this western site boundary, a little further to the south, which should be explored (particularly if this scheme is being delivered comprehensively).</p>	<p>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.</p>

5.1.9 The outcome of the Wheatcroft consultation does not resolve this matter at the time of writing, and the Inspector is advised that the access point between the Appeal Site and the adjacent DNH land remains the same. The appellants have not identified an optimum location to suit a range of environmental constraints, namely landscape, ecology and tree issues; furthermore, this is likely to be an outcome affected by the

lack of a comprehensive scheme, as the whole of the SSSA is not subject of this application /appeal.

Development within Ancient Woodland Buffers

5.1.10 I have previously raised a number of issues regarding the nature and scale of works being undertaken in close proximity to or affecting directly one or more of the Ancient Woodlands or their buffers as follows,

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Ancient Woodland</p> <p>The application suggests in various places that a 15m buffer from Ancient Woodland has been provided; however, parts of the layout (albeit small) appear to show that the development is likely to encroach into the buffer at various locations and furthermore there are various concerns about the nature and extent of works being left to detail at RMA stage (if it were approved), which may result in further impacts on Ancient Woodland (for example SUDs features and swales/ditches, paths, emergency access, watercourse crossings). Whilst the Sandleford SPD, 2015 suggested that the 15m should be taken from the centre of the tree trunk; it is unclear whether the more recent Natural England Standing Advice has been taken into account, which states clear guidance on the various potential impacts and sources, which may influence the buffer required to a different measure (sometimes larger). Similarly, adequate protection should also be provided for individual trees (including in particular those shown on the Ancient Tree Inventory), in line with NE Standing Advice.</p> <p>One such example of concern in landscape terms is the (comparatively) narrow gap between High Wood and Slockett’s Copse, where new engineered SUDs features and pathways and ‘conveyancing channels’ (p. 51 of the DAS) seemingly constructed within 15m of the protected woodlands appear to be proposed. Notwithstanding the above, Magic mapping identifies the same land as falling within Woodland Priority Habitat, as are many of the Ancient Woodland offsets. We also have concerns over the FRA & Drainage Strategy by Brookbank, which appears to show detention basins of almost equal volumes to their areas, suggesting difficulties balancing engineering constraints (steep side slopes)</p>	<p>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.</p> <p>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</p>

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>versus an visually acceptable meadow feature (shallow side slopes) has been left for Reserved Matters and needs to be addressed given the proximity of these features to Ancient Woodland and the parkland characteristics. This is also evident in the Transport Assessment (Vectos Appendix E) which appears to show a new Emergency Vehicle access (and Cycle Route) slicing through part of Waterleaze Copse Ancient Woodland and the stream (forming part of the extended shallow valley feature feeding the River Enborne). The SLR Character Appraisal for the land, LCA2h Waterleaze Copse, notes the high value and sensitivity of this landscape feature, but the direct harm that would be caused, including to the Ancient Woodland feature by the creation of another engineered route and a further means of vehicular crossing across the 'wet valley' has not been identified or assessed in application documentation (eg Barrell AIA Tree Report, LVIA etc.,).</p> <p>The lack of a comprehensive assessment highlighting the site constraints, including tree constraints/offsets should be corrected, and then used to guide the developable areas where work can take place in proximity to Ancient Woodland. At present, it is too ambiguous to be able to have certainty that the integrity of the woodland (and woodland floor, groundwater) will not be affected, and should be carefully examined by the relevant professionals.</p> <p>Furthermore, the scheme design appears to compound the physical isolation or separation of some of the Ancient Woodland features, which are contrary to the Standing Advice (NE).</p>	<p>emphasises that they are “a place for people to enjoy nature and relax”.</p> <p>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.</p>

5.1.11

The outcome of the Wheatcroft consultation does not resolve this matter at the time of writing, and the Inspector is advised that the harmful adverse effects arising from proximity of new elements being introduced have not formed part of the LVIA assessment on the Local Landscape Character Compartments LCC1a and LCC1b. The problem is particularly acute in relation to Valley Corridor LCC1b. Whilst these issues remain, I have concerns that there will be inadequate protection of the interlinked Ancient Woodlands and Valley Corridors due to the accumulation of new

built elements in the narrow, sloping gaps, which will encroach on the valley sides, eroding the condition and quality of the sensitive landscape. The effects arising from these issues were not assessed in the LVIA.

Monks Lane Frontage

5.1.12 I have previously raised a number of issues regarding the nature and scale of works and impacts arising along the Monks Lane frontage that were not recognised.

Landscape Review, September 2020 (as part of the Application Consultation)	Landscape Wheatcroft Review, February 2021 (as part of the LRM Consultation)
<p>Monks Lane currently provides a strong transition between the urban and rural area due to the contrasting nature of land uses and presence of established vegetation and will be subject to new access arrangements, including new junctions, a large roundabout with new lighting, requiring the removal of mature hedgerow with trees along the frontage. We note the extent of vegetation needing to be removed does not appear to consider the visibility splay requirements or the quantity of vegetation needing to be removed to accommodate the proposed development and access. The vegetation removals appear to be greater than that shown on the Tree Plans (Barrell). The Landscape Effects fail to assess the direct loss of tree and hedge vegetation or the change in character to Monk's Lane resulting from development and access changes (only the visual change is noted) and the significant loss of a well-established treed hedgerow frontage. The introduction of new housing and additional lighting will form an intervening feature along the road, enclosing the road with new built development and removing its association/ contribution of the wooded edge characteristics running up to the edge of the well-defined settlement and harming its transition to the wider landscape beyond (see in Viewpoint 5 for visual effects).</p>	<p>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".</p> <p>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.</p>

5.1.13

The outcome of the Wheatcroft consultation does not resolve this matter at the time of writing, and the Inspector is advised that the harmful adverse effects arising from the greater than anticipated removal of existing vegetation and the scale of new infrastructure or built elements being introduced have not formed part of the LVIA assessment. Whilst these issues remain, I have concerns that there will be inadequate mitigation along the street frontage, as the Appellants' intended approach was always to retain and enhance the existing hedgerow structure.

6.1 Landscape Effects

Landscape Effects Part 2 Description of Change, Magnitude and Significance (refer ES Appendix G6)

- 6.1.1 None of the Landscape Effects in the LVIA record effects in Year 1 or Year 15, contrary to the introductory paragraph for Residual Effects (LVIA section 7.6.4). It claims under Landscape Effects, that Appendix G6 has a detailed assessment “for all time periods”, but this is not the case. This contrasts with the approach taken in the visual assessment, which seemingly acknowledges the need for vegetation to establish in views; the same would be required for any landscape effects. I can only surmise that the author is mistaken or believes planting to be instantaneous.
- 6.1.2 I accept that the application is in outline and therefore the proposals are not fully resolved. However, the LVIA does not appear to have considered the effect of the proposed development on established trees and vegetation features within the Appeal Site, including those that would be lost. Notwithstanding the inconsistencies found in documentation, the Barrel arboricultural survey (CD 1.9 and updated CD 6.5) clearly recognises there will be a loss of features, but the LVIA (either section 7.6.4 or the accompanying Appendix G6 Part2 Description of Change, Magnitude and Significance), appears to make no mention or assessment of any of the vegetation (trees, hedges) that will be removed because of the proposed development (direct loss of Appeal Site features, some historic), and which currently make a valuable landscape, conservation, ecological or connective Green Infrastructure contribution.
- 6.1.3 To compound matters in relation to the **LCC Northern and Western Part**, only the lowest Sensitivity rating is used to evaluate the Part 2 assessment: Description of Change, Magnitude and Significance. This means that the role the sensitive woodlands, river valleys, meadows, grassland mosaic that is inherent to the character of the area, is totally diluted and lost and does not form any part of the assessment. This results in the outcome of the assessment to be lower than expected. I disagree with any suggestion that the effect would be Minor, given my comments above in Part

1 regarding Sensitivity. I concur with Major effects for Magnitude and consider that no less than Moderate to Substantial Adverse Effects will occur.

6.1.4

In relation to the **LCC Southern and Eastern Parts and Valley Corridor**, it is very unclear and questionable as to how the LVIA outcome of Major Magnitude of Substantial (Direct) Beneficial Effect is reached in the assessment, I disagree with this assessment, and that it is reversible; this is considered to be overstated by some margin. In addition, it is clear that a number of new elements (causing direct permanent and irreversible harm) have not been included in the LVIA assessment, as set out here,

- The requirement for 2no. SPD compliant road crossings within the Valley Corridors LCC1a and LCC1b is considered to result in direct adverse effects, which will also cause a degree of harm to the adjacent edges of the LLC3e and LLC3d areas; I accept that the harmful (adverse) effects of bridge crossings are unlikely to be mitigated in the long term; however, it is anticipated that the principles set out in the SPD and further detailed design considerations may only reduce the effects to a very limited degree.
- The introduction of new recreational pathways and crossings (across the existing watercourses and new conveyance channels) will change the fabric of the Valley Corridors LCC1a and LCC1b and is considered to result in direct adverse effects.
- The presence of highly engineered SUDs basins (1:3 or 1:4) and conveyance channels on sloping ground requiring significant earthworks on the slopes of the Valley Corridors LCC1a, LCC1b, and the parkland LCC3e and LCC3d are considered to be a direct adverse change. Such features may well require concrete headwalls, fencing for health and safety and vehicular access points for maintenance (eg grasscrete slopes) to further compound the engineered appearance, or in other terms the lack of visual amenity.
- Placing a NEAP into LCC3e contrasts with the parkland character described in all LCAs or LCCs and will cause a direct adverse effect to the fabric of that compartment.

- Placing a LEAP into the Valley Corridor LCC1b will cause direct harm to the character of that compartment.
- the emergency access and new cycleway crossing the parkland on the line of the historic western trackway, but only mentioned in the transport assessment. If this performs as an emergency access as part of the application, then there are implications for further concrete/grasscrete needed to widen the access, plus the added likelihood for lighting running through the valley.
- The proposals actively encourage and invite increased recreational pressure on the parkland and the resources of the Appeal Site, including woodland, wet meadows, grassland areas; indeed G9-28 acknowledges the very introduction of new features and plenty of activity via “SUDs features, orchards, recreational and educational trails, play areas and cycle routes”, which will inevitably alter the character of the park land in order to meet open space/ SPD requirements.
- The emergency access proposals on the transport plan shows a further ‘bypass’ route designed to avoid the mature trees on the historic trackway near Waterleaze Copse, which will be directly in front of Sandleford Park in LLC3d.

6.1.5

Whilst the area is proposed for a stated restoration of parkland features, it is by no means degraded as a landscape in its current form. Whilst it may be missing some elements/features associated with its historic character, these areas remain part of an already attractive high quality landscape, which contributes strongly to character (it is the appellants own conclusions (from the Part 1 assessment) that all these LLCs are of High Value, High Susceptibility and High Sensitivity). Therefore, I firmly believe the Magnitude of Change and Significance of that Effect has been overstated and will be rather more harmful, when balanced against the various harmful effects highlighted above. I remain concerned about the aggregation/ accumulation of built elements occurring in parts of the Site with the highest sensitivity, and within Ancient Woodland buffers. Furthermore, whilst the views of the houses may be filtered by existing and proposed trees, the presence of housing and play, with its associated domestic noise and activity, lighting and roads (and two valley crossings) in proximity to the otherwise tranquil locations of the valley corridors and the park land would be harmful to character as development encroaches and more people utilise the park

land areas. As a consequence, I conclude that the effects on the highly sensitive Valley Corridors LLC1a and LLC1b will be of Major Magnitude and a Substantial Adverse Significance of Effect, during Construction/Year1; following completion and establishment, the harm will remain and will reduce slightly to a Major to Moderate Magnitude and a Substantial to Moderate Adverse Significance of Effect, taking into account all the above interventions.

- 6.1.6 It is very unclear how the LVIA outcome of Moderate to Substantial Beneficial Landscape Effects is reached for the **LCA1: Highclere and Burghclere** beyond the River Enborne in Hampshire. As far as I am aware, there are no changes taking place in this LCA and I consider that such overstated indirect effects on landscape character of this significance will not be felt in this way in Hampshire (Basingstoke and Deane). If there were likely to be any issues relating to the adjacent district, I would be more concerned about the potential for adverse lighting impacts as Newbury's southern settlement edge extends dramatically southwards at the edge of the plateau overlooking the Enborne Valley. This is especially true when the appellant has already identified the presence of 'skyglow above urban edge of Newbury' in forming their case for the accompanying visual baseline for viewpoints 9 and 10 (LVIA Appendix G6 Visual Effects Table Part 1). However, I consider that the appellants have partly considered this though the provision of new planting to the edge of the NEAP on elevated land. I anticipate Slight Change of Minor Adverse Significance as a result of the new settlement edge position bringing potential light sources some c.600m closer to the district boundary. Nevertheless, it remains to be seen whether detailed lighting on the bridge crossings or lighting in the proposed country parkland (for emergency access/cycling) will be an issue.
- 6.1.7 It is very unclear how (and I disagree with) the outcome of Major Magnitude and Substantial Beneficial Effect is justified for the adjacent **LCA of UV4: Enborne Upper Valley** [corrected title from the superseded LCA A4 Enborne in the 2003 character assessment], or the LCC 2h Woodland area along River Enborne. As far as I am aware, there are no such radical changes taking place within this LCA, other than to manage the condition of the existing woodland, in line with the stated objectives to 'retain and enhance' to preserve character. I note management is a long term objective of an already existing feature that already makes a strong landscape

contribution to the character of the Enborne Valley and the parkland. In addition, serious concerns remain as to the nature of the unnecessary emergency access route, which is considered to have a direct adverse impact on part of the Ancient Woodland edge but was not considered within the LVIA (it is only mentioned in the transport assessment (CD 1.5)).

- 6.1.8 In relation to the **Monks Lane Fringes** a TCC (Townscape Character Compartment), I understand there will be a wholesale change to the character of Monks Lane, with the loss of extensive amounts of vegetation and the loss of trees (with consequences for Green Infrastructure and Biodiversity), and the implementation of a new roundabout. I consider the changes to the Monks Lane Fringes TCC will represent a Moderate to Major Magnitude of Change, resulting in Moderate to Substantial Adverse Effect to the character of this part of Monks Lane. Unsatisfactory mitigation has been provided to address the effects at the settlement edge.

6.2 Summary of landscape effects

- 6.2.1 The development of new housing at such a scale will without question result in the loss of a landscape resource that makes a significant contribution to Green Infrastructure. Policy CS18 relating to Green Infrastructure is very clear that;
- “Developments resulting in the loss of green infrastructure or harm to its use or enjoyment by the public will not be permitted”.*
- 6.2.2 The placement of large scale new housing into an area extending the existing settlement edge south and further into an area of rural open countryside, will cause significant harm to the countryside character of the open landscape; notwithstanding the errors and omissions in the appellants’ LVIA already identifies a series of Landscape Effects that are of Moderate and Substantial Significance (Appendix G6 Landscape Effects Table Part 2).
- 6.2.3 Policy CS19 seeks to;
- “Ensuring that new development is appropriate in terms of location, scale and design in the context of the existing settlement form, pattern and character”.*

It is evident that the proposed development is significantly harmful and does not respond to the distinctive character areas and key characteristics of the LCAs.

6.2.4 As a consequence, Policy C1: Location of New Housing in the Countryside confirms that;

“Planning permission will not be granted where a proposal harms or undermines the existing relationship of the settlement within the open countryside, where it does not contribute to the character and distinctiveness of a rural area”.

6.2.5 Given the nature of the settlement pattern (to the north) and the largely undeveloped setting of towns beyond the edge, as well as the high susceptibility of the undeveloped rural countryside beyond the settlement to accommodate residential development, I consider the characteristics of the area within which the appeal Site falls to have a High Sensitivity to Change in relation to large scale housing development, when the detailed characteristics of the appeal site are considered.

6.2.6 As previously identified, I have concluded that whilst this site is considered to be a Valued Landscape for the purposes of NPPF 170, the development would undoubtedly have a significant adverse effect on the perception of this area of rural countryside landscape in this location. Notwithstanding my assessment with regard to para 170, I am still mindful that the Appeal Site plays a very important and key role in the important landscape setting edge to the town of Newbury, and I am also very clear that there is still significant harm in landscape and visual terms that should be considered material to the outcome of this appeal.

6.2.7 Although the appellants have proposed a landscape strategy and Green Infrastructure as part of the outline scheme, I do not consider that this provides sufficient mitigation for the identified landscape and visual effects.

6.2.8 The mitigation offered on the landscape masterplan, does not go far enough in relation to what is shown on the historic maps (Appendix G1, or Dwrg 1 in AppendixG9) (CD 1.9), or the replacement of lost features (historic and more recent), or the creation of GI to enhance connectivity, including the recreation of items specific to the LCA, such as Heathland Mosaic (extending towards higher ground in the vicinity of Gorse Covert and Waterleaze Copse (on 1873 historic maps).

6.2.9 A missed opportunity to expand Waterleaze Copse as shown and provide a fully functional and attractive new recreational wooded/ heathland feature for the new community, following the historic landscape patterns of woodland and linear patterns running across and down the valley slopes towards the Enborne (as shown on G9). The result is more of a token gesture with a standard wooded edge and mown path; there is no attempt to provide any of the remnant heathland as part of the rich mosaic tapestry (found within WH2: Greenham Woodland and Heathland Mosaic), which would also fit with character and objectives of the LCAs Landscape Strategy (missed because the Appellant did not use the correct Landscape Character Assessment and design a scheme around the latest adopted documents). The older maps also highlight areas around gorse covert on slightly higher ground that would have displayed this characteristic as part of the mosaic across the plateau edge, which could have been developed.

6.2.10 It remains to be seen how the combined requirements for greatly increasing public access are combined with the need to protect areas of ecologic value and areas of ecological mitigation, which may require fencing in the park land to prevent access (for people and dog walkers), yet remain visually attractive without harm to the integrity of the rural open landscape, when combined with cycling and emergency access.

6.3 Visual Issues

Visual Effects Part 2 Description of Change, Magnitude and Significance (refer ES Appendix G6) (CD 1.9)

6.3.1 Overall, as I set out in the initial consultation response (September 2020) I considered that the LVIA has underestimated the effects of this development, and I maintain this is correct as follows,

6.3.2 **Monks Lane frontage (View 5):** There will be a loss in the transition between the low density urban and rural landscape, which will be subject to new access arrangements, including new junctions, a large roundabout with new lighting, requiring the extensive removal of mature hedgerow with trees along the frontage. As a consequence, the direct loss of vegetation (wrongly assessed in the LVIA to be

retained and enhanced in G6-7) and the magnitude of change to road users (cars, pedestrians and cyclists) will result in a significant change to visual amenity apparent along much of the road frontage with new houses fronting on and limited new replacement planting. This will result in a change of Major to Moderate and with Substantial to Moderate Adverse Significance of Effect along this part of the road frontage initially and during construction. I anticipate the effects to be permanent, resulting in a slight reduction to Moderate magnitude and of Moderate Adverse Significance on account of the limited mitigation being provided.

- 6.3.3 **Car Park of Newbury College (View 6):** Whilst it is unfortunate that the college itself has not been better integrated (and it would have been relatively simple), I consider the magnitude to be greater than stated, and the suggestion that ‘new structure planting’ will soften views is overstated, given the development is tight to the boundary of the college (page 73 DAS) (CD 1.10) and there is little in the way of strategic planting – the effects will not reduce to Minor Significance as suggested without providing increased structure planting at the interface. Nonetheless, I accept this is one of the less critical receptors in visual terms, and, although not acceptable, it is preferable to put up with a poor boundary edge here, rather than adding greater pressure to the Ancient Woodland. This poor choice in outcomes further demonstrates the constraints of this scheme.
- 6.3.4 **Sandleford Priory (Views 8a and 8b):** The Construction/Year 1 adverse effects are considered to be understated, whilst the Year 15 effects are considered to be overstated in the LVIA. The Appellants’ submitted photomontage (CD 1.9) for 8b usefully demonstrates why the proposed development would not result in such beneficial effects of Moderate to Substantial Significance, as claimed in the LVIA. The existing view remains relatively unchanged in the context of this wide panorama and the changes have only a limited bearing on the overall view. Furthermore, the montage or the assessment does not include the NEAP, the emergency access following the line of the track down the hill to meet the A339 road frontage (with the ‘bypass’ around existing trees on the historic track), the new SUDs basins or any tree canopy loss associated with Waterleaze Copse. Depending on the timing of the planting (as set out in my consultation response, September 2020) early planting would help to ensure that adverse effects of the development and the NEAP

particularly in winter are kept to a minimum, until the planting has established.

Accordingly, the views would be a Slight Magnitude of Change of Moderate Adverse Effect in the early years, changing to a Minor Beneficial Effect once the scheme has established. I note the Appellants have not considered any differences in position of the viewer from the Registered Park and Garden landscape from positions slightly to the south looking up through the Valley Corridor or towards the NEAP, more in line with the proposals.

6.3.5 PRow within park land (Sequential Views 14, 15, 16, 17 and 18): The assessment does not take into account a number of new elements. Users of the right of way (either cycling or walking) will make use of the formalised and widened/ newly surfaced cycle lane and concrete emergency road (if being constructed), whilst also experience sequentially some further recognisable changes in the parkland fabric as the landscape changes, including towards the new crossing point between the main Development Parcels (seen from the vicinity of 16 and 17), as well as the fact that there would also be glimpses of the proposed housing and the NEAP and orchard, between Dirty Ground Copse and Gorse Covert prior to the establishment of planting. There would also be a change to foreground views of the 'offline' emergency access together with the loss of trees in Waterleaze Copse, as well as the engineered nature of the SUDs basins, conveyance channels and the various crossing points (including vehicular) and new surfaced paths in this part of the valley. As a result, the Construction/Year 1 effects will be Moderate Adverse and of Moderate to Substantial Adverse Significance, reducing to Slight to Negligible Magnitude and of Negligible to Minor Beneficial Significance in Year 15, with the added establishment of new country park features and reinstatement of some historic features, albeit a more domesticated recreational landscape compared to the existing baseline.

6.3.6 Sequential Views from PRow (Views 19 to 25) : View 19 is the point at which an appreciation of the proposed development will become more apparent, with views approaching the NEAP, the new settlement edge, orchard, all experienced on the newly formalised and widened footpath, cycleway and emergency access (if constructed). These new elements will be uncharacteristic new features from within the rural parkland, currently an undeveloped area and where lighting is likely to be felt as well; however, the development edge has been softened with new planting

that will be positioned Gorse Covert and Dirty Ground Copse to help soften this interface over time. From view 19, I consider the Construction/Year 1 effects to be of Moderate Magnitude with Moderate to Substantial Adverse Significance of Effect, reducing over time to Negligible Magnitude and Negligible Significance of Effect. I agree with the Appellants' assessment of Moderate to Substantial Adverse Effects for viewpoint 20, looking towards the development parcels, but consider the reverse view out into the park land is overstated (Beneficial Effects of Moderate Significance in Year 1 and Moderate to Substantial in Year 15). It is not helpful to take a photograph from behind a hedge, and I consider from a few steps forward the viewer will experience views of the NEAP in the foreground from Construction/Year1 from the newly formalised surface, equating to an Adverse change of Moderate Magnitude and Moderate to Substantial Significance, reducing over time to a Negligible Magnitude and Negligible Effect (not a Moderate to Substantial Beneficial Effect, which is overstated). By Year 15, the outward long distance views across the panoramic landscape into Hampshire will be largely similar in context as they are now, albeit with a foreground change to meadow, and a few scattered parkland trees, with young emerging woodland planting in front of existing woodland blocks.

- 6.3.7 Within the core of the development area (LLC3b) from views 21-25 I concur there would be a Major Adverse Effect; however, I am concerned that the assessment considers the effect would reduce to Moderate in 15 years; I consider there is no mitigation that would reduce the harm caused by the total enclosure of the currently open rural path east of Warren Road, being entirely subsumed by housing on both sides. Its amenity and character will be totally altered by enclosure with housing on both sides (including a local centre), remaining a Major Adverse Effect in the long term.

6.4 Summary of Visual Effects

- 6.4.1 The Visual Impact Assessment prepared by the Appellant has identified a series of visual receptors with which I agree with; however, the assessment of effects is misplaced, and a number of receptors will experience significantly more harm (where adverse changes have been recorded in the LVIA), whilst others will experience a far

lesser degree of beneficial change, where a highly positive changes have been clearly overstated in the LVIA.

7 SUMMARY AND CONCLUSIONS

- 7.1.1 I do not consider that the proposals in their current form are an appropriate development for this sensitive location at the interface of the southern edge of Newbury.
- 7.1.2 The proposed development would result in the creation of a new area of visible and locally prominent residential development in the surroundings, with an intrusive effect which would harm the rural setting of the open landscape. The proposed development would therefore adversely impact on the key characteristics of the site that contribute to the sensitive rural setting of the village and local character, reducing its openness and role well beyond the edge of a settlement.
- 7.1.3 Within section 3, I have set out my assessment of the landscape value of the site with an overall judgement on value, using GLVIA3 guidance notes (Box 5.1, p.84) which identified 8 key areas to help identify areas of landscape which are valued.
- 7.1.4 As previously identified, I have concluded that this site forms part of a 'valued landscape' for the purposes of paragraph 170 of the NPPF. If the Inspector is minded to disagree with this judgement, then I would advise that nonetheless the Appeal Site and surroundings clearly form part of an attractive and well established landscape of significant value to the local area. Development would undoubtedly still have a significant adverse effect on the perception of this area's rural countryside landscape and would cause significant harm to individual features, the character of the local landscape and the visual amenity of the area.
- 7.1.5 Overall, I consider that the proposed development would have a much more significant landscape and visual effect on receptors in the surrounding area than identified by the Appellants' LVIA. The proposed development would introduce a permanent and significantly harmful large-scale residential development at this location that would form an intrusion into the countryside in this location that would be visible from a number of private and public views in the surrounding local area.
- 7.1.6 The large scale proposed development would appear incongruous, intensifying the presence of residential development in the undeveloped open countryside and, as a

result, would adversely impact on the character and appearance of the Appeal Site and surrounding countryside.

- 7.1.7 The proposed development does not ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, nor does it consider combined attributes of the natural, cultural, and functional components of character. The appeal scheme is of such scale and design in the context of existing settlement form, pattern and character and does not take account of the distinctive character areas or the key characteristics identified in relevant landscape character assessments or the relevant part of the Newbury Town Design Statement (townscape and rural interface of Monks Lane), as required by the Council's policy CS19.
- 7.1.8 Accordingly, the proposal further harms the existing relationship of settlement edge within the open countryside setting, because it does not contribute to the character and distinctiveness of a rural area.
- 7.1.9 As a result, I have concluded that in its current form the proposed development does not respect or enhance the character and appearance of the area or contribute positively to local distinctiveness and sense of place, as required by the Council's policy CS14.
- 7.1.10 The Council's policy on green infrastructure is that it will be protected and enhanced, and that developments resulting in the loss of green infrastructure or harm to its use or enjoyment by the public will not be permitted, according to CS18. In this instance I consider that the significant loss of Green Infrastructure in this location is wholly inadequate and its replacement is rather limited.
- 7.1.11 In addition to this, the integrity or continuity of landscape features is identified as being an important element to conserve and enhance the Environmental Capacity of the District in biodiversity terms and, given the extensive loss of the landscape resource across the appeal Site, I find it difficult to understand how a new large-scale development in this location would maximise opportunities to accord with CS17, when it would cause considerable fragmentation of Green Infrastructure, Landscape and Ecological network in this location, and no clear strategy to replace or enhance it, by providing suitable replacements, greater connectivity between assets, including

Ancient Woodland. (Note, I am not an ecologist and therefore I recognise I must defer to the Council's ecological witness Susan Deakin in this regard).

7.1.12

Notwithstanding the above, the proposals do not deliver a complete or holistic Strategic and Landscape Green Infrastructure, as required by the delivery of a comprehensive scheme across the whole allocation (a single site), and the proposals for Green Infrastructure appear fragmented, incomplete, damaging (as a consequence of fragmentation/removal of features) and as a consequence are unacceptable in landscape terms.

7.1.13

Notwithstanding the Appellants' intentions for new planting, the large scale of this development together with the significant loss of vegetation in key locations would result in the proposed houses being highly prominent elements in views, but relatively limited to the local area, including from local roads and Public Rights of Way. This would result in significant harm to the visual amenity of those receptors.

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