



# West Berkshire Local Plan Review 2022- 2039

## **Proposed Submission Consultation**

March 2023



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## CONTENTS

<b>1</b>	<b>Introduction</b> .....	<b>2</b>
1.1	Context.....	2
1.2	Plan Making.....	3
<b>2</b>	<b>Legal Compliance</b> .....	<b>4</b>
2.1	Duty to Cooperate .....	4
2.2	Sustainability Appraisal .....	4
<b>3</b>	<b>National Planning Guidance</b> .....	<b>6</b>
3.1	National Planning Policy Framework .....	6
3.2	National Planning Policy Consultations .....	7
<b>4</b>	<b>West berkshire local plan review proposed submission Consultation</b>	<b>8</b>
4.1	Policy DM2 – Separation of Settlements of Newbury and Thatcham.....	8
4.2	Policy SP12 – Housing Delivery .....	11
<b>5</b>	<b>Site Submission Profile</b> .....	<b>16</b>
5.1	Sandleford Park South, Newbury .....	16
<b>6</b>	<b>Conclusions</b> .....	<b>20</b>
6.1	Summary.....	20
	<b>Appendices</b> .....	<b>21</b>
	Appendix 1: Landscape appraisal for land at Sandleford Park South, Newbury	
	Appendix 2: Concept Masterplan	

# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the West Berkshire Local Plan Review Proposed Submission and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 Gladman has been involved throughout the plan preparation process and previously submitted representations to the Regulation 18 Scoping Report consultation in February 2018 and the further Regulation 18 consultation in November 2018. In March 2020 Gladman submitted a response to the West Berkshire Housing and Economic Land Availability Assessment consultation. Pegasus Planning submitted joint representations to the Regulation 19 consultation in February 2021 on behalf of ourselves and Donnington New Homes. These representations focussed on the delivery of Sandleford Park South and the Wash Common Relief Road. They were supported by a comprehensive landscape appraisal as well as a concept masterplan.

1.1.4 Gladman Developments have a land interest at Andover Road, Newbury. Together with the adjoining land which is controlled by Donnington New Homes, the site termed 'Sandleford Park South' provides the opportunity to deliver the much desired fifth access into Sandleford Park and alleviate congestion along the A343 whilst improving access to the A34. The site is available, suitable, and deliverable for housing as summarised in Section 5.1 of this representation. Gladman looks forward to engaging further with West Berkshire Council as the plan progresses.

## 1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

2.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

2.1.2 Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, West Berkshire Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation and the revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist.

### 2.2 Sustainability Appraisal

2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and

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Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

- 2.2.2 The West Berkshire Local Plan Review should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Council's decision-making and scoring should be robust, justified, and transparent.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Requiring plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

3.1.2 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations.

3.1.3 In particular, Paragraph 16 of the Framework (2021) states that Plans should:

***"a) Be prepared with the objective of contributing to the achievement of sustainable development;***

***b) Be prepared positively, in a way that is aspirational but deliverable;***

***c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;***

***d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;***

***e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and***

***f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."***



3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the GNSP provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.

## 3.2 National Planning Policy Consultations

3.2.1 In December 2022, Secretary of State for Levelling Up, Housing and Communities, Michael Gove unveiled a raft of proposed planning reforms as part of the Levelling Up and Regeneration Bill. A consultation on proposed reforms to the NPPF, views on an approach to preparing National Development Management Policies alongside developing policies to support levelling up, was open between 22<sup>nd</sup> December 2022 and 2<sup>nd</sup> March 2023.

3.2.2 The proposals include revisions to how housing figures should be derived, address issues in the operation of housing delivery and supply tests and several other elements. However, the Government has reiterated its commitment to delivering 300,000 homes a year, with the changes focussed on increasing housing delivery.

3.2.3 The consultation document highlights that reforms to the plan-making system are intended to be introduced in late 2024 and the Government have highlighted that plan-makers will have until 30 June 2025 to submit Local Plans for independent examination under the existing legal framework.

3.2.4 The West Berkshire Local Plan Review should seek to continue the development and preparation of the emerging Local Plan in line with the proposed transitional arrangements. However, given the proposed changes are subject to consultation and potential further revisions, the Council should be aware of the consultation outcome and possible changes to the NPPF in Spring 2023.

## 4 WEST BERKSHIRE LOCAL PLAN REVIEW PROPOSED SUBMISSION CONSULTATION

### 4.1 Policy DM2 – Separation of Settlements of Newbury and Thatcham

4.1.1 Gladman are concerned with the gap policy designations within Policy DM2 which have been proposed to prevent coalescence between Newbury/Thatcham and to maintain the separate identity of the settlements around both towns. Policy DM2 is not positively prepared, justified and effective in line with national policy and therefore the Local Plan cannot be considered 'sound' as currently drafted. The reasons for this assessment are set out in the following paragraphs.

4.1.2 Firstly, the identification of settlement gaps will act to constrain the ability of sustainable development opportunities from coming forward in the district which is significantly constrained by various policy and physical designations. Around 74% of West Berkshire is designated as AONB with further significant ecological and historical designations. The Council have already proposed to allocate 10 development sites to accommodate approximately 334 residential dwellings in the AONB through Policy SP15 and need to identify further residential development sites to meet their identified housing needs and to provide flexibility in the delivery of housing over the plan period.

4.1.3 Allocating areas of land as green gaps further restricts potentially sustainable development locations and effectively seeks to designate land as Green Belt by the back door, when they have already sought to direct development to the AONB, which is a legally protected landscape designated for the quality of its scenic beauty.

4.1.4 The Inspector currently examining the Bracknell Forest Local Plan stated in their Post Hearings Letter that the Strategic Gaps and Green Wedge policies in the plan did not add any value to the Plan and a main modification to Policy LP37 Landscape Character would provide adequate protection to the distinctive character setting of

settlements<sup>1</sup>. This is in the context of Bracknell Forest considering that exceptional circumstances existed to amend Green Belt boundaries to enable residential development sites to be allocated.

4.1.5 In this context, Gladman consider that Policy DM2 is not positively prepared or justified and that it would be appropriate to delete the gap policies from the Local Plan. It is considered that Policy SP8 provides adequate protection for the character setting of settlements.

4.1.6 Secondly, the Council should be aware that it is an aspiration of Newbury Town Council to improve the transport and highway network within the town identifying a preferred solution for a new road from the western Sandleford development running east and south of Garden Close Lane before joining the A343 at Wash Water<sup>2</sup>. Although a suggested route is not mapped within the document, it is apparent that this would involve development within the settlement gap. In this regard, West Berkshire Council should consider the implications of the policy on the future provision of a link road and delivering the local community's aspirations.

4.1.7 Finally, Gladman turn to the evidence base attempting to justify the proposed settlement gaps in Policy DM2. The supporting text highlights that the 'Appropriate Countryside Designation Study (2022)' was undertaken to determine whether specific designations were required to safeguard characters and identities of settlements.

4.1.8 The study is formed of a 3-step method comprising of:

- 1) Study Area and Parcel Identification;
- 2) Collect General Parcel Information; and
- 3) Parcel Assessment.

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<sup>1</sup> Bracknell Forest Local Plan: Inspectors' Post Hearings Letter (EXAM 61): <https://consult.bracknell-forest.gov.uk/file/6134773>

<sup>2</sup> Newbury Town Plan 2019-2036 (Page 37): <https://www.newbury.gov.uk/media/v25hhpk1/newbury-town-plan-final.pdf>

- 4.1.9 The first step identifies 10 large parcels of land using physical features and administrative boundaries through a 3 step method before the second step involved collecting general information about the parcels such as size, location descriptors and whether there were any general designations such as ecological or historical assets.
- 4.1.10 Finally, the third step assessed the 10 parcels against the five Green Belt purposes identified in the NPPF and undertook an additional 'Green Gap/Wedge Assessment' using four parameters:
- To prevent coalescence/merging (perceptual and physical) of settlements by maintaining open land between them to protect the separate identity of the settlements;
  - To guide development form (maintain existing or influence form and direction of urban development);
  - Provide a 'green lung' into urban areas (i.e. penetrating from open countryside into an urban area); and
  - Provide essential green infrastructure.
- 4.1.11 The assessment of Parcel 2 draws on the 'West Berkshire Landscape Character Assessment (LCA) (2019)' and 'Newbury Landscape Sensitivity Study (2009) Potential Strategic Development Sites'. The latter highlights that the housing at Enborne Row is, "...clearly separate at present from the Wash Common area of Newbury".
- 4.1.12 There is fleeting reference in the proforma and assessment in Appendix 2 of the document before pages 96 and 97 of the document propose a green gap designation despite the landscape notes highlighting that there are, "Few (or no views between the settlements due to topography and woodland".
- 4.1.13 There is no justification provided for the area of and proposed to form the settlement gap titled, 'Land between Newbury and Enborne Row/Wash Water' and no further assessment on the smaller area and parcels between Newbury and Enborne Row.

- 4.1.14 Indeed, page 39 of the document highlights that the assessment is strategic level and does not assess the impact of individual development proposals utilising "...existing evidence and desktop review using GIS and relevant mapping and aerial imagery. Site visits were then conducted to verify the desktop assessments".
- 4.1.15 There is no landscape visual assessment undertaken and the site visit appraisals are ineffective given they were not undertaken from within the proposed designation boundary. It is considered that the evidence base justifying the designation is not robust.
- 4.1.16 Pegasus on behalf of Gladman alongside Donnington New Homes have produced a Landscape Appraisal for Land at Sandford Park South, Newbury. The document undertakes a comprehensive landscape appraisal of the site and the surrounding areas including utilising view points from within the site.
- 4.1.17 The assessment highlights that beyond the settlement boundary of Newbury, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north. This is in part due to the topographic profile, the gently undulating topography of the local landscape but also due to the significant presence of tree cover and woodland which forms a patchwork quilt across the countryside. The document is set out at Appendix 1 of this representation and highlights how development could be brought forward in keeping with the character and appearance of the local existing residential neighbourhoods and settlements. This would support the Town Council's link road aspirations and will not lead to coalescence issues.

## 4.2 Policy SP12 – Housing Delivery

- 4.2.1 Policy SP12 seeks to provide a housing requirement for West Berkshire as a range of between 8,721 and 9,146 dwellings over the plan period 2022-2039, equivalent to 513 to 538 dwellings per annum (dpa). The figure of 513dpa has been calculated using the standard methodology and represents the Local Housing Need (LHN). The

policy states that the target figure of 538dpa has been calculated by applying a 5% buffer to the LHN and expresses the housing requirement as a range. It is not clear from the policy or the supporting text whether the lower end or the higher end of the requirement would be used for the purposes of future five-year housing land supply calculations. The use of a range is inherently unclear and ambiguous and is in direct conflict with the NPPF<sup>3</sup>.

4.2.2 This matter was considered at the Fylde Local Plan Examination in Public by Inspector Wright in 2018. As part of their Local Plan Review the Council wanted to replace the housing requirement figure with a range (the lower figure being derived from the standard methodology). The Inspector clearly rejected this approach between paragraph 32 and 34, which stated:

*32. Policy H1 in the FLP32 sets the minimum annual housing requirement as 415 dwellings. Policy DLF1 sets the overall requirement as 8,715 new homes over the 21 year plan period. The Plan revises both policies to include the lower housing requirement figure of 275 dpa and 6,895 dwellings overall, as assessed through the standard method. However, it also keeps the existing figures and identifies the housing requirement as a range. As proposed, Policy H1 therefore identifies 275-415 dpa as the housing requirement for the period 2019-2032, with the earlier years 2011-2019 remaining at 415 dpa. Policy DLF1 provides for a minimum of 6,895-8,715 new homes over the whole plan period.*

*33. Identifying the housing requirement as a range lacks clarity, is not effective and implies there is a maximum figure. Whilst I note that the Plan does not specifically state that the top of the range is a ceiling, it can be implied, and it is critical that the housing requirement is set out unambiguously. Accordingly, it is necessary for the housing requirement to be identified as a single minimum figure within the Plan for the period 2019/20 to 2031/32 and as a single figure for the total plan period requirement.*

*34. Therefore, in order to meet the housing needs identified in paragraph 30 above, it is necessary to modify Policy DLF1 so that the minimum total housing requirement for the plan period is 7,275 dwellings. Similarly, Policy H1 requires modifying so that the minimum*

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<sup>3</sup> NPPF (2021) Paragraph 16.

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*annual housing requirement is 305 dwellings for the period 2019-2032.... (emphasis added)*

- 4.2.3 The ongoing Central Lincolnshire Local Plan Review examination has also grappled with housing requirement ranges. In response to the Inspectors' Matters, Issues and Questions the Central Lincolnshire Joint Strategic Planning Committee agreed that expressing the housing requirement as a range could lead to confusion and a main modification was needed for the effectiveness of this element of the Plan<sup>4</sup>.
- 4.2.4 Similarly, the issue was considered during the examination of the Darlington Local Plan 2016-2036, whereby Policy H1 set a minimum housing requirement of 422 dwellings per annum (dpa) and also an annual target of 492 dpa over the plan period. The Inspector concluded that the 492 dpa figure was justified and positively prepared being consistent with the economic aspirations of the Plan. However, it was noted that the lower 422 dpa figure should be deleted as it served no purposes and creates ambiguity, including how the five-year housing requirement will be calculated in line with national policy<sup>5</sup>.
- 4.2.5 In addition, Gladman have serious concerns that progressing the proposed housing requirement in its current form will further exacerbate the significant shortage of affordable homes within West Berkshire.
- 4.2.6 As part of its plan preparation, the Council commissioned Icen Projects and Justin Gardiner Consulting to update elements of the housing needs evidence which was originally produced in May 2020. Responding to the wider definition of affordable housing as set out in the Framework, the report includes an updated assessment of the affordable housing need in West Berkshire. The report identifies that there is a

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<sup>4</sup> Central Lincolnshire Local Plan Review: Inspectors' Post Hearing Letter (EX034): [https://www.n-kesteven.gov.uk/\\_resources/assets/attachment/full/0/140406.pdf](https://www.n-kesteven.gov.uk/_resources/assets/attachment/full/0/140406.pdf)

<sup>5</sup> Darlington Local Plan 2016-2036: Inspector's Report: <https://microsites.darlington.gov.uk/media/2277/inspectors-report-dblp.pdf>

'high' overall need of 697 affordable homes per annum in order to fully address the affordable housing needs of West Berkshire.

- 4.2.7 The PPG sets out that an increase in the total housing figures included in a plan may need to be considered where it could help deliver the required number of affordable homes<sup>6</sup>. The Housing Needs Assessment Update outlines that the affordable need represents 136% of the Local Housing Need calculated using the standard methodology. It states that if the Council were to provide for the affordable housing need in full, taking into consideration the affordable housing policy of 40%, then the overall housing requirement would be equal to around 1,740dpa.
- 4.2.8 Gladman agree in part with Icení's conclusion in that providing for the full affordable need would be unrealistic in terms of how many market homes would need to be delivered. That being said though, given the chronic shortage of affordable homes available in West Berkshire, and the real-world implications for not delivering a sufficient number of affordable homes, we believe there would be significant social and economic benefits from an increased overall housing requirement. This in turn would deliver greater levels of affordable homes and help to address the well documented shortfall within West Berkshire. The East Riding of Yorkshire's Proposed Submission plan includes an uplift of almost 20% from the baseline local housing need figure in order to support the delivery of affordable housing, resulting in a housing requirement of 1,100dpa. Gladman urge West Berkshire Council to consider the application of a similar uplift in order to ensure a greater quantum of affordable housing is delivered.
- 4.2.9 Finally, the supporting text for SP12 outlines a number of sources which will be used in order to deliver the housing requirement through to 2039, these include, but are not limited to retained allocations, existing planning commitments, windfall sites and new sites allocated in the Local Plan Review.

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<sup>6</sup> PPG ID: 2a-024-20190220

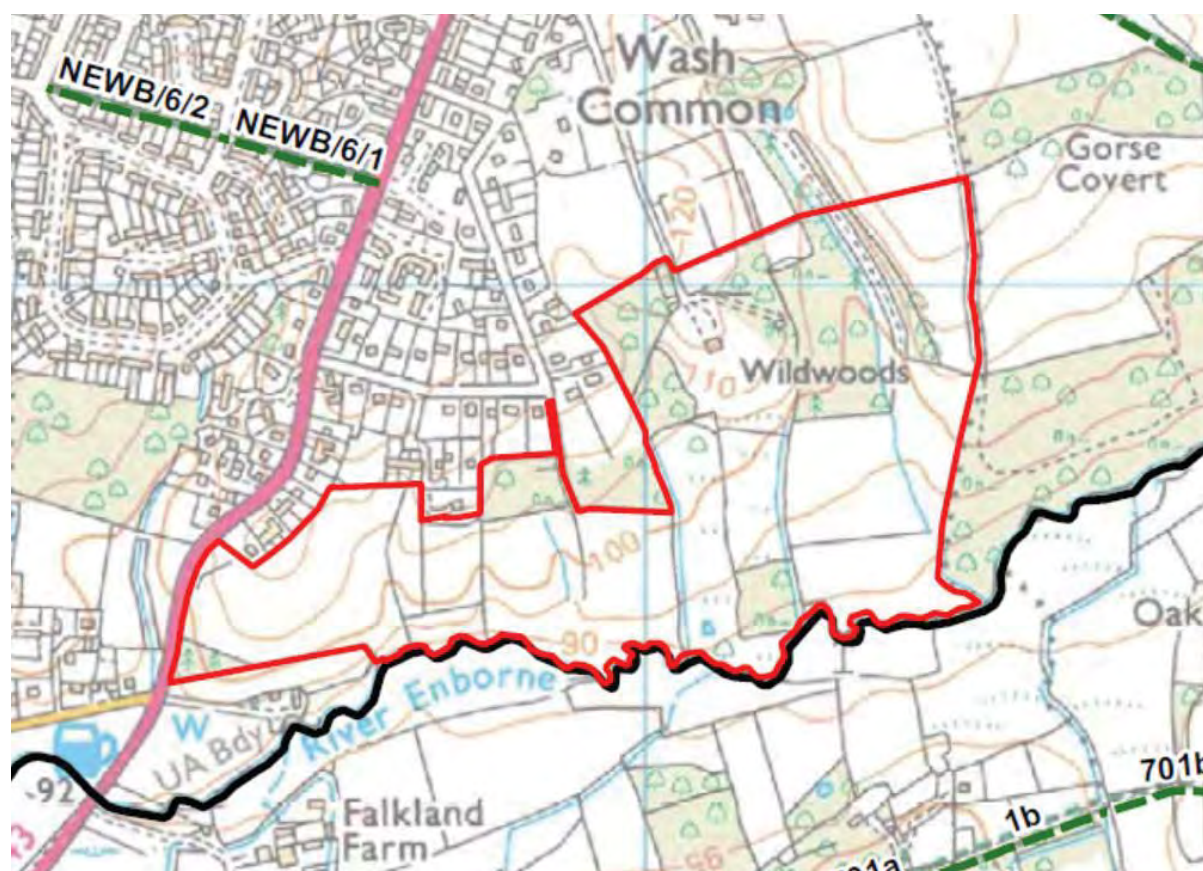


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- 4.2.10 Gladman notes that 80% (or 7,337 dwellings) of the growth expected to come forward over the plan period to 2039 is from completions since the start of the plan period, permitted sites, windfall and existing allocations carried forward from the Core Strategy and the Housing Sites Allocations DPD (adopted in 2012 and 2017 respectively). While a further 1,809 dwellings need to be identified for the deliverable supply to meet the housing requirement of 9,146 (upper end of range).
- 4.2.11 Gladman acknowledges that a proportion of these sites already benefit from planning permission however raise some concern over the deliverability of the sites. Gladman has specific concerns that the levels of housing proposed will not be delivered on these existing allocations, many of which have been allocated for six years and have not yet come forward. Gladman questions whether any further analysis or evidence has been provided to understand why these sites have not delivered and to demonstrate clearly that these sites will realistically be delivered within the plan period to 2039.
- 4.2.12 The Council acknowledge that there needs to be further flexibility built into the housing supply to allow for phasing issues and an element on non-delivery. The ongoing Levelling-up and Regeneration Bill: reforms to national planning policy consultation also notes that their analysis suggests 15% of planning permissions are not progressed or are revised.
- 4.2.13 In this regard, Gladman consider that an additional supply flexibility of 15% above the housing requirement should be identified to safeguard against the non-implementation and delivery of housing proposals and to ensure the Plan is effective and positively prepared in line with paragraph 35 of the NPPF.

## 5 SITE SUBMISSION PROFILE

### 5.1 Sandlesford Park South, Newbury

5.1.1 Gladman Developments Ltd, together with Donnington New Homes, are jointly promoting the area of land located to the south of the existing Core Strategy allocation at Sandlesford Park (Policy CS3), referred to as Sandlesford Park South (SPS), for residential development alongside proposals for the delivery of a Relief Road. A location plan is included at Figure 1 below. This representation follows on from previous submissions which have been submitted by Gladman and by Pegasus on behalf of Gladman, the most recent of which was to the Regulation 18 West Berkshire Local Plan Review emerging draft consultation in February 2021. As part of the previous submission, a detailed Landscape Appraisal was undertaken by Pegasus and is included at Appendix 1.



**Figure 1: Sandlesford Park South location plan**

- 5.1.2 Newbury is the largest and most sustainable settlement within West Berkshire and as such has rightly been the focus for future development. The proposed development site is well located to the south of the town and is within safe walking distance of a wide variety of services and facilities, including Falkland Primary School, Park House School and range of medical and retail outlets along Andover Road. Further to the current available services and facilities, the site is directly adjacent to the Sandleford Park strategic site which will provide further amenities and services once completed.
- 5.1.3 The proposed development would include the delivery of a Relief Road running between the western part of the Sandleford Park strategic development site, within New Warren Farm and the A343 Andover Road at Sandpit Hill, Wash Water, providing a fifth access to Sandleford Park. The delivery of this road infrastructure would redistribute traffic from Sandleford Park, relieving Monks Lane, Andover Road and Warren Road as west-bound routes to the A34. The proposed indicative route of this road and how this would sit alongside proposed residential development is set out in the concept masterplan at Appendix 2.
- 5.1.4 Pegasus's February 2021 representation highlighted our concerns that the HELAA assessment of the site had not fully considered the significant benefits the scheme could deliver to the local highway network by providing a fifth access into Sandleford Park. Indeed, the Council's Highways engineer's response to the HELAA stated that the delivery of strategic road infrastructure through the site is 'very important'.

#### Access

*Vehicular access for this site and the adjoining sites would be obtained via the A343 Andover Road with a 6.0 meter wide through road northwards connecting into Sandleford. This is very important as it allows traffic to not only spread from these three sites, but will also provide a fifth access for Sandleford that will reduce traffic on Andover Road to the north. The access on to the A343 will need to be a full roundabout or a traffic signal junction.*

- 5.1.5 Further to the positive benefits the Council's highways engineers deem from the delivery of the fifth access in Sandleford Park, there is also a clear level of support

from the local community for the provision of the Relief Road. Newbury Town Council prepared a Town Plan to focus on how the town of Newbury should respond positively and constructively to future development and challenges over the period 2019-2036. Within the Town Plan there is an aspiration of Newbury Town Council to improve the transport and highway network within the town. A key component of delivering this aspiration is the provision of a new road from the planned western Sandford development east and south of Garden Close Lane, joining the A343 at Wash Water in order to provide a direct access for Sandford residents to the A347. This Relief Road could be delivered in full within Sandford Park on land controlled by Gladman and Donnington New Homes.

- 5.1.6 As set out in the Landscape Appraisal, the site is relatively free from environmental constraints and as shown in the concept masterplan, included at Appendix 2, the areas of woodland would be retained. The areas of woodland which are present on site have been examined and have been shown to be in a state of steady decline. The provision of residential development would enable these woodland areas to form part of the green infrastructure and enable the public to access and enjoy them. Future public recreation could be kept to specific footpaths providing a benefit for existing and future residents. The proposed development of the site would reverse the current state of decline of the woodlands through investment in woodland management and maintenance, thus providing ecological benefits.
- 5.1.7 Further benefits of the proposed development site include a riverside linear park following the northern bank of the River Enborne. Whilst providing an attractive natural area of public open space, the riverside park will also provide a new route by foot and cycle from Wash Water to the new Country Park which forms part of the Sandford Park allocation and which is to be delivered through the planning permission to Bloor Homes. At present, there is only one public right of way from Wash Common through Sandford Park to the A339 – that being from Warren Road

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<sup>7</sup> Newbury Town Plan 2019-2036 (Page 37): <https://www.newbury.gov.uk/media/v25hhpk1/newbury-town-plan-final.pdf>

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eastwards to a point opposite St Gabriel's School. The provision of a second pedestrian/cycle route will be of benefit to existing and future local residents.

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## 6 CONCLUSIONS

### 6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the West Berkshire Local Plan Review proposed submission. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF) and the associated updates that were made to Planning Practice Guidance.
- 6.1.2 Gladman have provided comments on a number of issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored.
- 6.1.3 We hope that you have found these representations informative and useful towards the preparation of the West Berkshire Local Plan Review and Gladman welcome any future engagement with the Council to discuss the considerations set out as well as the development potential at Sandford Park South.

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## APPENDICES

Appendix 1: Landscape appraisal for land at Sandford Park South,  
Newbury

# LANDSCAPE APPRAISAL FOR LAND AT SANDLEFORD PARK SOUTH, NEWBURY

**ON BEHALF OF  
DONNINGTON NEW HOMES AND GLADMAN DEVELOPMENTS**

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## 1. INTRODUCTION

Donnington New Homes and Gladman Developments have instructed Pegasus to undertake a landscape appraisal with respect to a site located on the southern fringes of Newbury, to the east of the Andover Road, the A343. This report has been based on a site visit which was undertaken during January 2021 together with an analysis of environmental data. The purpose of this report is to explain why the site is suitable to accommodate residential development in the form proposed as shown on the masterplan from a landscape and visual perspective. The masterplan has been informed with regard to a number of landscape and visual parameters as set out in this report. (see Appendix 5)

### **Development Context**

- 1.1 The site is identified by the red line which is shown on the site location plan at appendix 1. The northern boundary of the site is contiguous with a strategic housing allocation, "Sandlesford Park", identified in West Berkshire Council's adopted Core Strategy, shown as yellow tone on the environmental designations plan (The Emerging SP allocation is shown on appendix 2). The western side of the northern boundary is contiguous with existing residential properties and their curtilages. The eastern boundary is demarcated by a hedgerow boundary defined by a treebelt, together with the boundary of a wood. In broad terms, the southern boundary follows the watercourse associated with the River Enborne. The western boundary is defined by the Andover Road, the A343.
- 1.2 Newbury itself is a town that extends over a large area. The site lies on the southern edge of the residential area known as Wash Common, a large residential area which flanks either side of the Andover Road (which is orientated north-south) in the south-western part of the town. The site is framed by this residential development, whilst the strategic housing allocation of "Sandlesford Park" (south of Monks Lane) forms the site's immediate development context to the north. However, on the ground, currently this area is managed as farmland defined by an irregular network of fields punctuated by small woodlands. As a consequence, residential development located across the promotion site would effectively dovetail into the existing residential properties located to the east of Andover Road and link seamlessly into the residential allocation to the north.

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## **Environmental Designations**

- 1.3 Whilst there are a range of environmental designations which extend across the landscape which forms the local environs, the site is relatively free of environmental constraints. The site is bounded to the south by the River Enborne which has associated with it, a small floodplain which is limited in extent due to the incised nature of the valley. As a consequence, the areas which are subject to flooding as identified by flood zone mapping, are very limited and located close to the watercourse within the southern parts of the site. The vast majority of the site would be physically unaffected by these flood zones given that it mainly comprises north facing slopes to the River Enborne Valley (Appendix 2).
- 1.4 There are several woodlands that are located within the site, however, only two of these are identified as Local Wildlife Sites (see appendices). The existing woodland areas that lie within the site are primarily located within the eastern half of the land. These woodlands are quite extensive and mature in character, defined by mature native woodland trees, such as oak, beech, alder and ash. These discreet small areas of woodland would be retained. Examination of these woodlands reveals that there has been little effective woodland management associated with these areas for some time, and as such the woodlands from a landscape and ecological perspective are in a state of steady decline. The introduction of residential neighbourhoods as proposed and illustrated in the masterplan (Appendix 5) would provide the opportunity to enable these wooded areas to form part of the green infrastructure and open space which would be available for members of the public to use. The public recreation could be limited to defined footpaths to ensure that the ecological aspects of the wooded areas would be suitably protected. With this approach the wooded areas can provide both ecological and recreational resource. With investment in woodland management and maintenance these woodland areas present an opportunity to be managed as 'community woodland' and as such, management would enhance these from both a landscape and ecological perspective and in so doing, reverse the current state of decline.
- 1.5 As far as other designations are concerned, there are no heritage assets in terms of Listed Buildings, located either within the site, or indeed nearby (Appendix 2).
- 1.6 The site lies outside and well beyond the nearest AONB which lies approximately 1km to the south-west of the site and to the south of the A34 principal highway. The nearest part of the AONB is primarily formed of woodland. Given the

topographic profile of the land between the site and the AONB together with the mature tree cover in the intervening landscape, there are no visual links between the site and the AONB. As such, residential development can be located on the site without effecting the (visual) setting of this designation.

- 1.7 Whilst there is some open access and registered common land located to the south-east of the site and the River Enborne Valley in the vicinity of Newtown Common, there are no such designations associated with the site. There are two local wildlife sites relating to woodland within the site itself. Varied ecological designations such as Local Wildlife Sites, Local Nature Reserves and Sites of Special Scientific Interest all lie well beyond the site itself. Whilst there is some ancient woodland associated with tree cover in the locality, there is none within the red line itself (Appendix 2).
- 1.8 In terms of public rights of way, there are a number of footpaths and bridleways particularly in the vicinity of Newtown Common to the south of the River Enborne Valley. There are also a number of footpaths and bridleways located with the residential district of Wash Common which lies to the north of the site. However, the site itself has no public rights of way either on the boundary or within the site itself and currently remains private land.
- 1.9 Having considered the local environmental designations it is apparent that this site is significantly free of such constraints. (Appendix 2)

### **Sustainability**

- 1.10 The settlement of Newbury is a large settlement which has a wide range of community facilities. A large residential allocation is located immediately to the north of the site, to the south of Monks Lane which would provide good vehicular and pedestrian connectivity to the proposed development. The proposal also provides the opportunity to connect directly into the A343 Andover Road at its western boundary, a principal highway orientated north-south that leads directly into the heart of Newbury town centre to the north. This would provide further good pedestrian and vehicular connectivity with the nearby principal highway network.
- 1.11 The scheme would abut and dovetail into the adjacent residential area, together with residential roads such as Garden Close Lane and potentially, some of the private roads and tracks and lanes leading off this residential road. There is a

wide range of facilities situated nearby, located a short distance to the north of and flanking the Andover Road, (the A343), which includes Falkland Primary School, together with Park House School. There are also a range of medical facilities and retail outlets flanking this principal highway. The proposed development is located immediately adjacent to existing and strategically planned residential areas on the south side of Newbury and is therefore inherently situated in a sustainable location.

### **Topography**

- 1.12 In terms of topography, in broad terms the site is situated on the northern side of the River Enborne Valley and as such, exhibits south facing slopes towards the River Enborne. The western end of the site clearly demonstrates this topographical profile with the most northerly parts of the site forming the local high ground. The highest points of this part of the site sit at approximately 130m AOD and has topographic continuity with the adjacent residential properties which front onto the Andover Road. The western fields exhibit a moderate gradient in terms of slope in a southward direction. The lowest most southerly parts of the site are situated at approximately 90m AOD.
- 1.13 The fields in the middle of the site exhibit a similar south facing slope, however, the fields are punctuated by a series of very small valleys (indentations) that connect into the River Enborne to the south. These valleys either exhibit small watercourses or very wet ground evident by the sedges and other wet grassland plant communities. These small undulations in the topographic profile of these middle fields are clearly seen on the site location plan.
- 1.14 The eastern half of the site exhibits similarly a south facing slope towards the River Enborne but is shallower with moderate to shallow gradients across much of the land, with the highest areas rising to approximately 130m along the northern boundary of the site. Some of this area forms woodland and is known as Brick Kiln Copse (see appendices). There is a small tributary valley which is orientated north-south and extends from Wash Common and runs along the eastern side of the site before opening out into more shallow sloping ground towards a central part of the eastern half of the site. Again, there are a number of small streams that flow southward towards the River Enborne and tend to follow field boundaries. Slopes across the site tend to be moderate to gentle in gradient profile and would not present a constraint to residential development. However, in the western half of the site the gradients do steepen closer towards the

southern boundary close to the River Enborne, which would present more challenging conditions for accommodating residential development. This part of the site would be most appropriately retained as part of the green infrastructure (public open space) which would run along the northern side of a watercourse as part of a wooded riparian landscape framing the development.

- 1.15 There is a clear pronounced south facing slope across the majority of the site and as such, the principal residential roads would traverse this slope and adopt an east-west orientation in preference to a north-south orientation.

### **Visual Amenity**

- 1.16 The site has some planning history, in particular the western part to the east of the Andover Road, the A343. It was previously subject to an application and an appeal submitted by Gladman. Whilst there are some footpaths to the south on the southern side of the Enborne Valley, these form primarily a cluster around Newtown Common as can be seen in the site location plan at appendix 1.
- 1.17 The Inspector noted that there was a degree of visibility associated with the Gladman appeal scheme that would be appreciated from the southern side of the Enborne Valley along the public rights of way and highways in this locality. By introducing a substantial treebelt running along the southern boundary of the western half of the site on the steeper slopes and adjacent to the River Enborne watercourse, such a linear treebelt would provide substantial screening for residential properties on the lower slopes of the site. With a spine road running through the site orientated east-west linking the Andover Road with the residential allocation to the north, this would provide the opportunity to introduce substantial treecover along this highway corridor. There is the opportunity to introduce an avenue of trees on either side of this highway, set within roadside grass verges to create a boulevard effect along the length of this road. By specifying fastigate (trees with a more upright habit) native species to form this double avenue of trees, this would create another belt of treecover running mid slope through the length of the site. Such treecover upon establishment (and particularly maturity) would have an effective role in framing and screening residential properties on the upper slopes of the site. This strategy would particularly apply to the land located in the western half of the site.
- 1.18 Residential development as proposed located in the eastern half of the site is framed by the blocks of woodland both retained within the site and those

woodlands which lie beyond the site. Collectively, both woodlands on site and off site would provide a strong physical framework for the proposed neighbourhood areas, and as such would be visually contained to a high degree. With a structural treebelt running along the southern boundary of the site adjacent to the watercourse and together with another one running mid slope along the alignment of the spine road, would ensure that residential development would be suitably screened from views from the south and would address the issues raised by the Inspector. The overall site benefits from a high degree of visual containment.

- 1.19 There are no public rights of way immediately to the west of the site and whilst there are residential properties associated with Enborne Row, a small hamlet to the west, there would be little opportunity to observe the proposed residential development from the highways associated with this settlement.
- 1.20 With regard to the north, the land and topography rises to local high ground upon which the wider residential district of Wash Common is located, together with the strategic residential allocation. With the absence of public rights of way in this area combined with the topographic profile of the land and built form and heavily treed landscape there would be little opportunity to observe the residential development from the north.
- 1.21 With regard to views from the east, there are few public rights of way located eastward of the site. This area is characterised by a continuation of the River Enborne Valley but is generally devoid of public rights of way and forms a heavily wooded environment. A combination of these factors would ensure that there would be little opportunity to observe the proposed residential neighbourhoods from the east.
- 1.22 In terms of views from the south, this primarily relates to the southern side of the River Enborne valley and there is local rising ground in the vicinity of the dispersed settlement of Newtown Common. Whilst there are a few public highways and a dense network of public rights of way in this area, the vast majority of these are set with a heavily wooded landscape such that there would be little opportunity to observe the proposed residential development from this settlement or indeed for any of the public rights of way in this area, see site location plan, appendix 1.

- 1.23 It is apparent from this general analysis that the site benefits from a significant degree of visual containment such that development as proposed with the masterplan would not have a significant visual effect upon the surrounding settlements or countryside.

### **Vegetation Form**

- 1.24 There is a significant amount of vegetation associated with the site. With the eastern half of the site the upper slopes are punctuated with some significant areas of woodland. There are several blocks of woodland, one located close to the River Enborne and one framed by residential development on the northern boundary of the site. These are significant areas of woodland which are mature defined by native trees. Given their significant presence, the masterplan would accommodate these significant blocks of treecover. Whilst these areas of treecover are currently private land there is the opportunity to open these woodlands so that members of the community would have the benefit of them as public spaces and be promoted as community woodlands. These have some ecological value and with them being carefully managed there is the opportunity to provide investment for these areas to assist with their ongoing management and maintenance which would, in the medium and longer term, further enhance their ecological value. Public access would be on defined footpaths and cycle routes to ensure the protection of the biodiversity interest of the woodlands, similar to those proposed to Brick Kiln Copse which forms part of the Sandford Park West outline planning application proposals. At appendix 4 illustrates how the local community could make effective use of these woodlands, in a controlled manner.
- 1.25 The site is subdivided into fields, the boundaries of which are demarcated by hedgerows; however, these have now grown into treebelts and tree hedges which are quite substantial and significant in their own right as local landscape features. This is most easily seen by means of an aerial photograph.
- 1.26 The masterplan has been carefully designed to ensure that the majority of these treebelts and tree hedges would be retained and effectively integrated into the proposed residential development to provide green infrastructure. This provides an effective way of subdividing the site into a series of residential neighbourhoods, but it also provides a mature landscape that the residential areas would benefit from in terms of backdrop of treed landscape.

- 1.27 There are a number of individual isolated standard trees within the central field of the site which again could be accommodated within the residential layout. Retention of the hedges, trees and woodlands collectively would define the green infrastructure for this residential development as areas of public space. The green infrastructure here would be defined by a network of community woodland areas for the local residents to enjoy. Careful management and maintenance would ensure that these areas would be multifunctional in terms of their use, not only contributing to the visual amenity of the proposed development but also providing an opportunity for informal recreation for the local residents whilst providing a valuable habitat for flora and fauna locally which would contribute to the net biodiversity gain associated with this proposal.

### **Landscape Character**

- 1.28 It is evident from field observation of the site and the surrounding countryside and townscape of Newbury that the site and its immediate environs form a heavily wooded landscape and that as far as the site is concerned, it physically and visually relates to the River Enborne Valley, a shallow narrow valley which is broadly orientated east-west linking Newtown and Newtown Common to the east with Enborne Row to the west. Beyond the boundary of the settlement itself, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north. This is in part due to the topographic profile, the gently undulating topography of the local landscape but also due to the significant presence of treecover and woodland which forms a patchwork quilt across the countryside. Not only are there some substantial areas of woodland but there are many smaller copses which punctuate the landscape which are connected by a network of treebelts and tree hedgerows which subdivide the landscape into a network of fields. There is a wooded character to the local landscape, and this is also evident on the site.
- 1.29 The proposed masterplan envisages a number of neighbourhood areas which are set within the retained vegetation and in particular treecover that frames and subdivides the site. As a consequence, the residential neighbourhoods would have a strong sylvan backdrop and character to them which reflects the general character of the immediate locality. The proposed development would therefore be in keeping with the character and appearance of the local existing residential neighbourhoods.



### **Potential Development Framework Strategy**

- 1.30 The site itself is located adjacent to not only the existing residential neighbourhood of Wash Common but would also link seamlessly into the strategic residential allocation immediately to the north and as such is located in an inherently sustainable location, particularly given its connection to the Andover Road and the local wide range of facilities flanking this highway a short distance to the north.
- 1.31 In terms of environmental designations, the site is relatively free of environmental constraints. Whilst areas of woodland are identified as local wildlife sites, these are areas of woodland that the proposed development would both retain and integrate to form an integral part of the green infrastructure associated with the proposed residential neighbourhood. Investing in these woodlands as a community asset, for informal community use would enable them to be multifunctional, not only to enhance the visual amenity of the proposed residential neighbourhoods, but also to provide a resource for informal recreation and the opportunity to secure, retain and enhance these as habitats for flora and fauna in the medium and longer term.
- 1.32 In terms of topography, in broad terms the site lies on the north facing valley side of the River Enborne Valley and as such, exhibits south facing slopes which are generally shallow to moderate in gradient across much of the site such that the topography would not present a constraint to development. Only some southern parts of the site close to the River Enborne where the topography is steeper would there be a constraint, but such areas would be best retained as wooded treebelts and form part of the wider community woodland framework for the scheme.
- 1.33 The site is currently primarily countryside together with some residential use in the form of one large property set within generous grounds. The land is subdivided into a series of irregular shaped fields, the boundaries of which are demarcated in the main by mature tree hedges or treebelts. This vegetation in general terms is mature, substantial and provides an opportunity to provide a strong landscape framework for a number of residential neighbourhoods within the site. All of these landscape features in terms of hedgerows, trees and woodland can collectively form the green infrastructure for the development.

- 
- 1.34 This would form an effective multifunctional environment not only to accommodate flood alleviation but also provide an attractive framework in visual amenity terms, an area for informal recreation, the opportunity to accommodate flora and fauna from an ecological perspective.
- 1.35 In terms of visual amenity, the eastern half of the site is extremely well contained in visual terms given the topography and configuration of tree cover and woodland framing the site. Whilst the western half of the site is more visible from some public footpaths on the southern side of the valley, by introducing a tree belt along the southern boundary of the site adjacent to the Enborne River as a riparian wooded landscape together with a tree boulevard feature defining the spine road which traverses the mid slope, both these features would effectively visually frame residential neighbourhoods on the upper and lower slopes within the western half of the site.
- 1.36 A residential development within this site accommodating the field and vegetation pattern would ensure that the proposal would reflect the grain of the landscape and in so doing would be in keeping with the character and appearance of other residential neighbourhoods in the local landscape and townscape. This would ensure that the residential scheme would be successfully integrated into the existing landscape framework of the site and its surrounding area.

**Prepared by Andy Cook**  
**Executive Director**  
**5<sup>th</sup> February 2021**

## APPENDIX 1

### SITE LOCATION PLAN



## APPENDIX 2

### ENVIRONMENTAL DESIGNATIONS PLAN



## APPENDIX 3

### PHOTO LOCATION PLAN AND PHOTOS

**KEY**

Site Boundary

Viewpoint Location



Revisions  
First Issue- 04/02/2021 AD

**Viewpoint Location Plan**

**Sandleford Park South**

Client: Donnington New Homes  
DRWG No: **P20-2795\_03** Sheet No: - REV: -  
Drawn by: AD Approved by: AC  
Date: 04/02/2021  
Scale: 1:5,000 @ A3



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**VIEWPOINT 1 - Looking south**



**VIEWPOINT 2 - Looking south west**



**VIEWPOINT 3 - Looking east**



**VIEWPOINT 4 - Looking north**



**VIEWPOINT 5 - Looking south**



**VIEWPOINT 6 - Looking east**



**VIEWPOINT 7 - Looking south**



**VIEWPOINT 8 - Looking west**



**VIEWPOINT 9 - Looking north east**



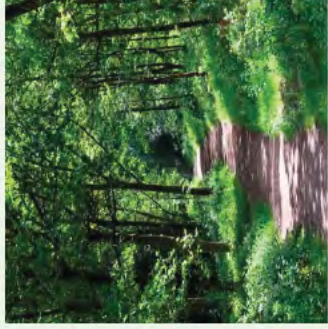
**VIEWPOINT 10 - Looking north west**



**VIEWPOINT 11 - Looking north**

## APPENDIX 4

### COMMUNITY WOODLAND IMAGES





## APPENDIX 5

### PROPOSED ILLUSTRATIVE MASTERPLAN



- Site Boundary
- Vehicular Access
- Pedestrian Access
- Pedestrian and Emergency Access
- Indicative Location of Play Area (LEAP)
- Existing Buildings Retained & Converted
- Root Protection Areas (RPAs) for Retained Cat A & B Trees
- Local Wildlife Site Boundary
- 15m Buffer Zone to Out Laying Tree Trunks
- Indicative Proposed Pedestrian Link
- Indicative Location of JFE Primary School
- Indicative Location of School Expansion Site
- Indicative Location of Extra Care Facility
- Indicative Building Frontages
- Indicative Existing Trees
- Indicative Proposed Trees/ Landscaping
- River Embankment & Pond
- Flood Zone
- New Roundabout to Andover Road

**SANDLEFORD PARK - CONCEPT MASTERPLAN (SOUTH)**

## APPENDIX 6

### GLADMAN DEVELOPMENT FRAMEWORK PLAN



-  Site Boundary 12.36ha
-  Land promoted by Donnington New Homes
-  Existing bus route and bus stops
-  Potential residential land 5.30ha (approximately 160 dwellings @ 30dph)
-  Potential vehicular access point
-  Potential future access to Sandleford Park Urban Extension
-  Potential pedestrian/cycle link
-  Potential spine route
-  Potential circulation through the development
-  Potential new Locally Equipped Area for Play (LEAP)
-  Existing vegetation
-  Public open space
-  River Emborne
-  Potential location for Sustainable Drainage (SuDS) features

Rev	Date	By	Description



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<b>Project</b>	Land off Andover Road, Newbury
<b>Title</b>	Development Framework Plan
<b>Client</b>	Gladman Developments Ltd
<b>Scale</b>	1:2500 @ A3
<b>Date</b>	March 2020
<b>Checked</b>	SG
<b>Drawing No</b>	CSA/3546/102
<b>Rev</b>	



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## Appendix 2: Concept Masterplan



- Site Boundary
- Vehicular Access
- Pedestrian Access
- Pedestrian and Emergency Access
- Indicative Location of Play Area (LEAP)
- Existing Buildings Retained & Converted
- Root Protection Areas (RPAs) for Retained
- Cat A & B Trees
- Local Wildlife Site Boundary
- 15m Buffer Zone to Out Laying Tree Trunks
- Indicative Proposed Pedestrian Link
- Indicative Location of JFE Primary School
- Indicative Location of School Expansion Site
- Indicative Location of Extra Care Facility
- Indicative Building Frontages
- Indicative Existing Trees
- Indicative Proposed Trees/ Landscaping
- River Embankment & Pond
- Flood Zone
- New Roundabout to Andover Road

# SANDLEFORD PARK - CONCEPT MASTERPLAN (SOUTH)

