



**LRM**  
PLANNING  
LIMITED

## **SANDLEFORD PARK, NEWBURY**

### **Section 78 Appeal: Statement of Case**

Outline planning application 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.

LPA Reference 20/01238/OUTMAJ

Bloor Homes and Sandleford Farm Partnership

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## Contents

<b>1</b>	<b>Introduction .....</b>	<b>4</b>
<b>2</b>	<b>The Appeal Site .....</b>	<b>6</b>
	Site Description .....	6
	Development Plan Status .....	7
	Planning History .....	7
<b>3</b>	<b>The Appeal Scheme .....</b>	<b>10</b>
	The proposed development .....	10
	New Warren Farm .....	11
	Comprehensive Development .....	12
<b>4</b>	<b>The Development Plan .....</b>	<b>13</b>
	West Berkshire Core Strategy .....	13
	Housing Sites Allocations DPD .....	17
	West Berkshire District Local Plan (1991-2006) (Saved Policies 2007) .....	17
	Replacement Minerals Local Plan for Berkshire .....	18
	Waste Local Plan for Berkshire .....	19
	Sandleford Park Supplementary Planning Document. ....	19
	National Planning Policy Framework and Planning Practice Guidance .....	19
<b>5</b>	<b>The LPA’s Decision.....</b>	<b>20</b>
<b>6</b>	<b>The Appellants’ Case .....</b>	<b>24</b>
	Principle of Development.....	24
	The Benefits of the Proposed Development.....	24
	Comprehensive Development and the co-ordinated provision of Infrastructure .....	27
	Green Infrastructure.....	27
	Affordable Housing.....	28
	Housing Mix.....	28
	Code for Sustainable Homes .....	28
	Design .....	29
	Transport and Highways .....	29
	Trees and Ancient Woodland .....	30
	Nature Conservation and Biodiversity.....	31
	Flood Risk .....	32
	Historic Landscape .....	32
	Environmental Nuisance, Pollution Control .....	32
	Minerals .....	32
	Planning Obligations.....	33
	Synthesis .....	33
	Third Parties.....	34
<b>7</b>	<b>How should the Appeal be heard? .....</b>	<b>36</b>
	Evidence to be called by the Appellants .....	37
<b>8</b>	<b>Documents .....</b>	<b>38</b>



**Appendix 1: Extent of Strategic Site Allocation – West Berkshire Core Strategy**

**Appendix 2: Site Location Plan**

**Appendix 3: West Berkshire Council Decision Notice 20/012438/OUTMAJ**

**Appendix 4: Valley Crossing Study**

**Appendix 5: Park House School Playing Field Scheme**



# 1 Introduction

1.1 Bloor Homes and Sandleford Farm Partnership (the Appellants) submitted an outline planning application to West Berkshire Council (the LPA) for development at Sandleford Park. Sandleford Park is a Strategic Site allocated in the West Berkshire Core Strategy for development up to 2026 and beyond.

1.2 Outline planning permission was sought for the following proposed development:

*The construction of 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.*

1.3 All matters were reserved for subsequent approval save for means of access from Monks Lane.

1.4 The planning application was submitted on the 28<sup>th</sup> May 2020 and duly registered by the LPA on the 24<sup>th</sup> June 2020 and given the LPA application reference number 20/01238/OUTMAJ. The statutory period for determination was the 14<sup>th</sup> October 2020.

1.5 During the determination period, the LPA did not request the submission of further reserved matters pursuant to under Article 5(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 nor did they request additional environmental information under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 for. The LPA did not request an extension to the statutory period of determination.

1.6 Rather, the LPA wrote to the (then) Applicants on the 18<sup>th</sup> September 2020 indicating that it had decided in the circumstances that it would not seek, allow, and/or accept the submission of any further amendments and/or additional information in relation to the planning application and that it would proceed to determine the application. Given that a number of the consultation responses published in the days prior to this specifically requested additional information or clarification or consideration of matters associated with a planning obligation, the Appellants considered the LPA's approach to be unreasonable and made a response to the LPA on the 25<sup>th</sup> September 2020. On the 29<sup>th</sup> September 2020, the LPA wrote to Appellants to indicate that it maintained the position that it did not intend to accept the 25<sup>th</sup> September 2020 submission



and associated documents onto the planning file and/or to re-consult on the application.

1.7 The LPA refused the application on the 13<sup>th</sup> October 2020, citing 14 reasons for refusal. The LPAs Delegated Report was not published until the 30<sup>th</sup> October 2020.

1.8 Accordingly, an Appeal against refusal of an application for planning permission is being submitted pursuant to Section 78(1)(a) of the Town and Country Planning Act 1990.

1.9 As is required, the Appellants have prepared a Statement of Case to accompany its Appeal. This provides the following information:

1.9.1 At Section 2: a description of the Appeal Site, its status in the Development Plan and relevant planning history;

1.9.2 At Section 3: a description of the Appeal Scheme by reference to the planning application material;

1.9.3 At Section 4: a precis of the relevant planning policy framework germane to the determination of the Appeal;

1.9.4 At Section 5: a summary of the LPA's Reasons for Refusal;

1.9.5 At Section 6: the Appellants' view of the main issues associated with the determination of the Appeal and its position in respect of those matters;

1.9.6 At Section 7: and having regard to Annex K of the Planning Inspectorate's Procedural Guide to Planning Appeals, the Appellants reasons why the Appeal should be heard by way of a Public Inquiry and the scope of evidence it intends to produce in respect of the main issues.

1.10 Lastly, Section 8 provides a list of the documents which the Appellants intend to refer to.



## 2 The Appeal Site

### Site Description

- 2.1 The Appeal Site forms a substantial part of the land allocated as the Sandleford Park Strategic Site in the adopted Core Strategy – Policy CS3. The extent of the area of land allocated as the Strategic Site in the Core Strategy is shown at *Appendix 1* and the extent of the Appeal Site is shown on plan 14.273/PP01 RevB at *Appendix 2*.
- 2.2 The Appeal Site comprises approximately 114 hectares and is primarily in agricultural use. The Site is divided between the town of Newbury and the parish of Greenham.
- 2.3 It is located immediately south of the existing built-up area of Newbury. Newbury is the main urban area in West Berkshire; it has a population of approximately 40,000 and a range of service and facilities comparable with its role and function.
- 2.4 The Appeal Site is situated some 2km from the town centre, in a sustainable location with good access to its facilities, public transport services, including the mainline railway station, employment opportunities and the strategic road network. In addition, a range of more local retail and community infrastructure uses are situated in closer proximity to the Site.
- 2.5 Newbury Rugby Club is located between the Appeal Site and Monks Lane, while to the north east of the Site is Newbury College. Falklands Surgery and David Lloyd Fitness Centre are also located on Monks Lane. Park House School, a secondary school and sixth form, adjoins the Site's western boundary. Wash Common local centre and Falklands Primary School are located within the residential area on the west side of Andover Road. A new primary school is being built by West Berkshire Council to the east of the Site adjoining Newbury College.
- 2.6 To the north east of the Site and Newtown Road is Newbury Retail Park, which comprises a range of food outlets including a large format superstore. St Gabriel's School (grade 1 listed building and grade II registered park) is to the south of the Retail Park.
- 2.7 The Appeal Site contains several areas of ancient woodland. The site is divided into a number of fields, which are bounded by hedgerows.
- 2.8 The Appeal Site has a complex topography but generally slopes downwards from north to south towards the river Enborne. A valley lies in a relatively central location within the site which runs from the north-west corner until it reaches the river Enborne in the south-east corner. The



fringes of the site are flat or gently sloping land.

- 2.9 There are no major access routes into the site, but a public footpath (GREE/9) runs through the Site linking Andover Road in the west with Newtown Road in the east.
- 2.10 The remaining part of the allocated site that is not part of the Appeal Site is known as New Warren Farm. The boundary between the Appeal Site and New Warren Farm is defined by hedgerows and tree belts. There are a small number of buildings situated at New Warren Farm. New Warren Farm gains vehicle access from Warren Road/Andover Road to the west.

### Development Plan Status

- 2.11 The **West Berkshire Core Strategy** was adopted in 2012. It sets out the overall planning strategy to 2026 and beyond, including the overall housing requirement, the settlement hierarchy and strategic allocations.
- 2.12 Policy CS3 of the Core Strategy allocates Sandleford Park as a strategic site for a mixed-use development, comprising up to 2,000 new homes, a country park and associated community infrastructure. Development of this site is integral to the implementation of the Core Strategy – it is intended to provide 1,000 new homes by 2026 with remaining completions beyond the plan period.
- 2.13 The LPA also produced a Supplementary Planning Document to provide a framework for future development of the allocated site. The SPD includes development and urban design principles that proposals should reflect.
- 2.14 The Appellants' planning application has been prepared in the context of the Core Strategy's policies and are in conformity with the Development Plan as the starting point for consideration of the Appeal. The Appellants' development proposals also reflect the SPD.

### Planning History

- 2.15 Four planning applications have previously been submitted for development at Sandleford Park.
- 2.16 A hybrid planning application (ref: 15/02300/OUTMAJ) for the entire allocation, comprising 136 hectares of land, was submitted by Bloor Homes and Sandleford Farm Partnership in September 2015. This sought planning permission for up to 2,000 new homes, extra care housing, local centres uses, education uses, means of access and green infrastructure. The approval of details for Phase 1 were also sought as part of that application.





- 2.17 A second planning application (ref: 16/00106/OUTMAJ) was submitted in December 2015 relating only to the details of Phase 1 consistent with those submitted within the hybrid application.
- 2.18 The LPA did not support these applications and cited the fact the Applicants did not control the whole of the allocated site as giving rise to concern about the deliverability of the scheme overall. In February 2017, the Applicants agreed with the LPA to place the First and Second Application into abeyance until November 2017. Without further reference to the Applicants, the LPA refused both the First and Second Application on the 8th November 2017. These Applications were not Appealed.
- 2.19 A Third Planning Application was submitted by the Applicants in December 2016, which related only to land owned by Sandleford Farm Partnership (ref 16/03309/OUTMAJ). On this occasion, it proposed the construction of 1,000 new homes along with associated uses. It did not include land at New Warren Farm. In March 2017, the LPA and the Applicants agreed to work together to explore how this Third Application could be positively determined, notwithstanding that it did not extend across the whole of the allocated site. Whilst the Applicants proposed revisions to this scheme during 2017 to address comments from the LPA, the Application was however refused on the 14th December 2017. The LPA's decision notice set out 28 Reasons for Refusal, which to a great extent focused on their concern that the proposed development did not cover the whole of the allocated site, was not a comprehensive development scheme, that infrastructure would not be provided in a co-ordinated manner, and, in their opinion, constituted piecemeal development that would prejudice the delivery of the remaining allocated land. This Application was not Appealed.
- 2.20 Rather, a further planning application was submitted in March 2018 and incorporated the revisions proposed by the Applicants in October 2017, and, where relevant, responded to the various Reasons for Refusal associated with the earlier applications.
- 2.21 Also in March 2018, Donnington New Homes submitted an outline planning application for development on the remainder of allocated site (New Warren Farm).
- 2.22 A Memorandum of Understanding was agreed between the Appellants and Donnington New Homes at that time which illustrated how the two schemes were aligned in terms of land uses and set out the respective infrastructure commitments for each site, demonstrating how they would deliver the complete package of infrastructure required for the entire site allocation.



- 2.23 Between June 2018 and October 2019 various technical meetings were held and amendments to the scheme discussed. The Applicants submitted additional information first in November 2018 and then in September and October 2019 and in February 2020 to address comments made in respect of the Application. This material was not formally accepted by the LPA and they did not reconsult. The LPA then disposed of the Application on the 18<sup>th</sup> September 2020.
- 2.24 The current application, the subject of this Appeal, was submitted in May 2020 and brought together the amendments to application 18/00764/OUTMAJ. The Appeal Scheme is described in the following Section.



### 3 The Appeal Scheme

#### The proposed development

3.1 Planning permission is sought for the following proposed development:

- residential development comprising up to 1,000 dwellings;
- 80 unit Extra Care facility;
- up to 40% affordable housing;
- a local centre (retail, local business employment and community uses);
- a new two form primary school and 1.62ha of land safeguarded for expansion of Park House School;
- areas of equipped play;
- areas of open space including the Country Park, areas of green infrastructure incorporating existing retained vegetation (woodlands, tree belts, hedgerows), proposed woodland planting, habitat creation, new footpaths, cycle routes and amenity space, and associated parking; and
- sustainable urban drainage infrastructure within both the proposed development areas and the Country Park.

3.2 These are uses which accord with the Strategic Site allocation in the Core Strategy (Policy CS3).

3.3 The Parameter Plans identified in Table 1 of the Planning Statement provide a pictorial explanation of these development proposals. Drawings 172985\_A\_07.1 and 172985\_A\_08 provide the detailed design of Monks Lane accesses for which planning permission is sought.

3.4 The application site is comprised of three Development Parcels. These are shown on Plan 14.273/PP05 RevB.

3.5 Built development is focused to the north and west of the Appeal Site. This reflects the arrangement of development land shown on the Framework Masterplan that is part of the Sandleford Park SPD prepared by the LPA.

3.6 The proposal is for up to 1,000 dwellings with a range of house types and sizes and 80 extra care units as part of the affordable housing element of the scheme. As encouraged by the Core Strategy and SPD, this provides a focus on family housing; 65% of the housing comprises family accommodation. Affordable housing is to be delivered throughout the site and, consistent with



Core Strategy Policy CS6, will comprise 40% of dwellings including the Extra Care. Residential densities on the site range between 30 and 50 dwellings per hectare which accords with the Core Strategy Policy CS4 and the Sandleford Park SPD.

- 3.7 The topography of the site creates a natural divide – a northern section and a western section – creating two neighbourhoods. The northern neighbourhood is comprised of Development Parcels North 1 and 2. The Central development parcel makes up the western neighbourhood. These two neighbourhoods comprise a mix of dwelling types and are well connected to one another and the surrounding area through green linkages and pedestrian and cycle routes. Character Areas across the site will draw upon principles identified in the Sandleford Park SPD.
- 3.8 A mixed use local centre will be located in Development Parcel Central within the western neighbourhood and will allow for flexible floorspace to be developed within the A, B1a, and D1 use classes, as well as residential development (C3). The local centre will be accessible by a range of transport modes including bus, pedestrian and cycle routes.
- 3.9 A new two-form entry primary school is proposed in Development Parcel North 1 reflecting discussions to date with the Local Education Authority. Land has also been identified for future expansion of Park House School contiguous with its current boundary within Development Parcel Central. The implementation and delivery of the school sites will be controlled by planning condition/planning obligation. Safe walking routes to schools will be integrated within the development.
- 3.10 Section 3 of the Planning Statement provides a summary of the various components of the Appeal Scheme. This provides information about the uses proposed in the various development areas, means of access, highway connections to adjoining land and off-site highway improvements identified from the LPA's VISSIM model, housing mix, open space, and infrastructure commitments more generally.
- 3.11 The various components of the proposed development accord with relevant Development Plan policies.

### New Warren Farm

- 3.12 New Warren Farm is not part of the Appeal Site, but comprises the remainder of the Strategic Site Allocation. It is variously referred to as either New Warren Farm or Sandleford Park West. Donnington New Homes submitted a planning application for development at New Warren Farm and an adjoining parcel of land referred to as Sanfoin in March 2018 (18/00828/OUTMAJ).



Donnington New Homes propose the following development:

- Up to 440 new homes
- 60 extra care housing units
- The construction of a 1 form entry primary school
- Land for expansion of Park House School
- Enhancements to Brick Kiln Copse to provide sustainable drainage
- a green infrastructure strategy focused upon Brick Kiln Copse which creates east-west and north-south green links through the site
- the main access route into the site from Warren Road, which is to continue through to the wider Sandleford Park area to the east
- potential emergency access from Kendrick Road
- potential for pedestrian and cycle links from Kendrick Road and Garden Close Lane
- one new play area (LEAP)
- provision of a specialist play facility to be operated by the charitable organisation Swings and Smiles, adjacent to New Warren Farmhouse

3.13 Application 18/00828/OUTMAJ has not been determined by the LPA.

### Comprehensive Development

3.14 To illustrate the comprehensive approach taken within both applications, a series of 'Combined Plans' were prepared initially in 2018 and then updated as part of the 2020 Application. These were common to the applications submitted by Donnington New Homes in respect of Sandleford Farm West and the Appellants in respect of its applications in 2018 and 2020.

3.15 In addition, a Memorandum of Understanding, also initially prepared in 2018 and updated in 2020, was agreed by the Applicants. This set out the respective infrastructure commitments made in conjunction with the individual applications and which are to be secured either by planning condition or planning obligation. The Appellants remain committed to the infrastructure provisions set out in the Memorandum of Understanding.

3.16 In evidence, the Appellants will demonstrate how the proposed development has been designed to facilitate the comprehensive development of the allocated site and how infrastructure to meet its needs and the needs of the wider development is to be provided. It will demonstrate how granting planning permission would not prejudice the delivery of the remainder of the allocation at New Warren Farm.



## 4 The Development Plan

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

4.2 The Development Plan is currently made up of different documents:

- West Berkshire Core Strategy Development Plan Document (2006-2026) adopted July 2012;
- Housing Sites Allocation DPD adopted in May 2017;
- West Berkshire District Local Plan 1991-2006 (Saved Policies 2007);
- Replacement Minerals Local Plan for West Berkshire incorporating alterations adopted in December 1997 and May 2001; and
- Waste Local Plan for Berkshire adopted December 1998.

4.3 The Appeal Site is not part of any Neighbourhood Plan Area.

### West Berkshire Core Strategy

4.4 The adopted Core Strategy is a development plan document which sets out the long-term vision for West Berkshire to 2026 and beyond. It provides an overall framework for more detailed policies and site-specific proposals to be contained in other Local Plan documents.

4.5 Relevant Core Strategy Policies to the determination of this Appeal are listed below:

4.5.1 **Area Delivery Plan Policy 1 Spatial Strategy:** Most new development is to be accommodated within or adjacent to the settlements included in the defined settlement hierarchy. Newbury is defined as an Urban Area. Urban Areas are to be the focus for most development.

4.5.2 **ADPP2 Newbury:** Newbury is to accommodate approximately 5,400 new homes over the Core Strategy plan period, contributing to its role and function as the largest urban area in West Berkshire. This is equivalent to half of the Plan's housing requirement. Urban extensions to the town to the east, on land at Newbury Racecourse, and, later in the plan period, to the south at Sandleford, will provide new residential neighbourhoods with supporting facilities and green infrastructure.

4.5.3 **CS1 Delivering New Homes and Retaining the Housing Stock:** Provision will be made for the delivery of at least 10,500 net additional dwellings and associated infrastructure over the period 2006 to 2026. Delivery will be phased and managed in order to meet at least an annual



average net additional dwelling requirement of 525 dwellings per annum and to maintain a rolling five year supply of housing land.

4.5.4 **CS3 Sandleford Strategic Site Allocation:** This is the site-specific policy relating to the Appeal and has been reproduced below:

*“Within the area identified at Sandleford Park, a sustainable and high quality mixed use development will be delivered in accordance with the following parameters:  
Phased delivery of up to 2,000 dwellings, of which at least 40% will be affordable and with an emphasis on family housing. At least half the housing is planned to be delivered by 2026;*

- *Development to be limited to the north and west of the site in order to respect the landscape and sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandleford Priory;*
- *Residential densities on the site to be in an average range of between 30 and 50 dwellings per hectare to reflect the predominant mix of family sized homes;*
- *Generation of on-site renewable energy;*
- *Two vehicular accesses will be provided off Monks Lane with an additional sustainable transport link for pedestrians, cyclists and buses provided from Warren Road onto the Andover Road;*
- *Further infrastructure improvements will be delivered in accordance with the Infrastructure Delivery Plan. Any infrastructure needs which are critical to the delivery of the site are set out in Appendix D;*
- *Provision of a new primary school on site and the extension of Park House School;*
- *Provision for retail facilities in the form of a local centre and business employment;*
- *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.”*

4.5.5 Appendix D lists various highway improvements, public transport provision, cycling and walking infrastructure and utility upgrades.

4.5.6 **CS4 Housing Type and Mix:** Residential development will be expected to contribute to the



delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community, including those with specialist requirements. In the areas outside town centres, new residential development will predominantly consist of family sized housing which should achieve densities of between 30 and 50 dwellings per hectare and should enhance the distinctive suburban character and identity of the area.

- 4.5.7 **CS5 Infrastructure Requirements and Delivery:** This Policy seeks to ensure that infrastructure provision and services for new development are provided in a co-ordinated manner, whilst protecting local amenities and environmental quality. Appendix D of the Core Strategy provides a schedule of the infrastructure considered by the LPA to be critical to its delivery.
- 4.5.8 **CS6 Provision of Affordable Housing:** In order to address the need for affordable housing, a proportion of affordable homes will be sought from new residential development. On greenfield development sites of 15 dwellings or more, 40% provision will be sought.
- 4.5.9 **CS13 Transport:** Development that generates additional traffic will be required to, amongst other things, reduce the need to travel, improve travel choice and facilitate sustainable travel, mitigate the impact on the transport network, as well as demonstrating good access to key services and facilities.
- 4.5.10 **CS14 Design Principles:** New development is required to demonstrate high-quality and sustainable design that respects and enhances the character and appearance of the area, making a positive contribution to the quality of life in West Berkshire. A range of design principles are laid out for new developments to respond to.
- 4.5.11 **CS15 Sustainable Construction and Energy Efficiency:** This Policy requires that new residential dwellings meet Level 4 of the Code for Sustainable Homes from 2013 and Level 6 from 2016. However, this has been superseded by the Written Ministerial Statement titled 'Planning Update March 2015'. In this Statement, it was made clear that the Code for Sustainable Homes has been withdrawn and, as such, there is no longer a national policy basis against which to enforce this requirement. Therefore, the residential dwellings at Sandleford Park will be constructed in accordance with prevailing Building Regulations only as intended by Government. Separately, new non-residential development is expected to meet the BREEAM Excellent construction standard.
- 4.5.12 **CS16 Flooding Flood Risk:** Flood Risk Assessments are to be carried out for new development on sites of 1 ha or more in Flood Zone 1 or sites in Flood Zone 2 or 3. On all development sites,





surface water is to be managed through the implementation of sustainable drainage methods to provide attenuation to greenfield run-off rates and volumes and provide other benefits where possible, such as water quality, biodiversity and amenity.

4.5.13 **CS17 Biodiversity and Geodiversity:** Assets across the District should 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 or enhanced. Development which may harm, either directly or indirectly, locally designated sites, or habitats or species of principal importance for the purpose of conserving biodiversity, or 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. 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.

4.5.14 **CS18: Green Infrastructure:** The District's green infrastructure will be protected and enhanced. New developments will make provision for high quality and multifunctional open spaces of an appropriate size and will also provide links to the existing green infrastructure network. Specific standards for provision within new developments will be identified in the masterplanning 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.

4.5.15 **Policy CS19 Historic Environment and Landscape Character:** 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.

- 4.6 In evidence, the Appellants will demonstrate how the Appeal Scheme accords with these various development plan policies or where, as in the case of CS15, material considerations justify a departure from a policy.

### Housing Sites Allocations DPD

- 4.7 West Berkshire Council adopted a Housing Sites Allocation Development Plan Document in May 2017. Whilst this identifies additional housing allocations to those strategic sites set out in the Core Strategy, it also includes a generic policy, **Policy GS1**. This is relevant to the determination of the Appeal.
- 4.8 Criterion i states that “Allocated sites [should] be masterplanned and delivered as a whole to achieve comprehensive development that ensures the timely and coordinated provision of infrastructure, services, open space and facilities”. Single planning applications are required for each allocated site to “ensure this comprehensive approach to development is achieved”.
- 4.9 In evidence, the Appellants will describe how the Appeal Scheme is part of a comprehensive approach to the development of the allocated site and how its land use arrangements and infrastructure commitments facilitate development of the remaining part of the Site.

### West Berkshire District Local Plan (1991-2006) (Saved Policies 2007)

- 4.10 The saved policies of the West Berkshire District Local Plan also form part of the current Development Plan for the District.
- 4.11 **Policy OVS.5** Environmental Nuisance and Pollution Control directs that the Council will only permit development proposals where they do not give rise to an unacceptable pollution of the environment. It identifies mitigation measures related to the construction process that seek to minimise the adverse impact on the environment or loss of amenity.
- 4.12 **Policy OVS.6 – Noise Pollution** requires that appropriate measures be taken in the location, design, layout, and operation of development proposals to minimise any adverse impacts as a result of noise generated. For noise sensitive developments, which include housing and schools, regard should be had to existing sources of noise, the need for appropriate noise insulation



measures and noise exposure levels.

- 4.13 **Policy TRANS1 – Meeting the Transport Needs of New Development** requires the provision of a range of facilities associated with different transport modes including public transport, walking, cycling and parking provision. Such principles are encapsulated in WBC Core Strategy Policy CS13 and the Sandleford Park SPD. Policy TRANS1 also refers to parking standards but this is a matter more directly relevant to detailed applications for reserved matters in due course and in the context of parking standards in the Housing Sites Allocation DPD.
- 4.14 **Policy SHOP.5 - The encouragement of Local and Village Shops** outlines that the Council will encourage proposals for the provision of local shops within new residential areas to support the increased demand for such provision in areas of new development. This objective is similarly set out in Policy CS3 of the Core Strategy specifically in relation to Sandleford Park.
- 4.15 **Policy RL1 – Public Open Space Provision in Residential Development Schemes** sets out a standard for open space provision ranging between 3 and 4.3 hectares per 1000 population. The form, scale and distribution of such provision is to be considered in the context of individual circumstances. Policy RL.2 identifies that the provision of open space will be satisfied by amongst other ways allocating space on the development site itself. Policy RL.3 gives criteria for assessing the quality of open space proposed alongside new development. Again, Core Strategy Policy CS3 and the Sandleford Park SPD provide specific requirements for the provision of open space, which exceed this standard and exhibit the measures required.

### Replacement Minerals Local Plan for Berkshire

- 4.16 The Replacement Minerals Local Plan for Berkshire was initially adopted in 1995 and was subject to alterations in 1997 and 2001. It sets out policies to be applied for mineral extraction in Berkshire over the period to 2006. The following policies are amongst those that have been saved:
- 4.16.1 Policy 1: local planning authorities will seek to husband the mineral resources of Berkshire to prevent their wasteful use or sterilisation;
- 4.16.2 Policy 2: local planning authorities will oppose development proposed which would cause the sterilization of mineral deposits on proposed development sites subject to criteria relating to commercial interest, there is an overriding case in favour of the proposed development proceeding without the prior extraction of the minerals; or where extraction would give rise to strong environmental objection; and



4.16.3 Policy 2a: local planning authorities will in appropriate cases encourage the extraction of minerals prior to other more permanent forms of development taking place. In such instances, prior extraction of minerals must be capable of firstly being completed within a timetable that would not unreasonably prejudice the timetable for the subsequent development; and secondly the associated traffic would not cause unacceptable impacts on the environment or living conditions.

### Waste Local Plan for Berkshire

4.17 The Waste Local Plan for Berkshire was adopted in 1998. It sets out detailed land use policies for the treatment and disposal of waste in the County. It also identifies Preferred Areas for Waste Management Uses (Policy WLP11). The Appeal Site is not within such an area. None of the other remaining policies are considered relevant to the proposed development.

### Sandleford Park Supplementary Planning Document.

4.17.1 The LPA also has produced a Supplementary Planning Document (SPD) for Sandleford Park to support the Core Strategy policy and is a material consideration in determining this Appeal. It was first adopted in September 2013 and then amended in March 2015. The SPD provides more detailed guidance in the form of development and urban design principles to guide future development and investment, while acting as a framework for future planning applications and approvals.

### National Planning Policy Framework and Planning Practice Guidance

4.17.2 The Government's National Planning Policy Framework, updated in 2019, is a material planning consideration in the determination of this Appeal, as is the Planning Practice Guidance. Relevant aspects will be referred to be Appellant.



## 5 The LPA's Decision

5.1 The LPA Refused the outline planning application on the 13<sup>th</sup> October 2020. Its Decision Notice is at *Appendix 3*. Fourteen reasons for refusal are cited, which variously allege the following:

### **Reason for Refusal 1**

5.2 The proposed development fails to ensure the holistic comprehensive development of the Sandleford Strategic Site Allocation. The failure to secure comprehensive development of the Strategic Site renders the proposal unacceptable.

### **Reason for Refusal 2**

5.3 The proposed development does not secure the comprehensive delivery of the intended sustainable urban extension and fails to provide a holistic approach to landscape, visual impact, green (and other) infrastructure for development of the whole Strategic Site. An application for only part of the allocated site prejudices the successful delivery of the development of the Strategic Site.

### **Reason for Refusal 3**

5.4 The Applicants' Landscape and Visual Assessment does not adequately and appropriately assess the impact of the proposed development in these terms; the proposed development does not take account of key characteristics and special features of the Site and will result in an unacceptable level of harm, with significant impact on the landscape character and visual resources; and, the proposed development does not protect or enhance a valued landscape.

### **Reason for Refusal 4**

5.5 Notwithstanding that the application proposes 40% affordable housing, the proposed development does not offer a policy compliant provision of affordable housing in terms of tenure and would have be unacceptable and harmful to the community's need for affordable housing.

### **Reason for Refusal 5**

5.6 The proposed development does not fully exploit the specific potential of the Site's south facing orientation, greenfield status and scale to deliver an exemplar development in terms of reducing



carbon dioxide emissions, renewable energy generation and delivering a zero-carbon residential-led mixed use development. The proposal fails to demonstrate a high-quality and sustainable design or that it will be built to high environmental standards. This amounts to unsustainable and harmful development.

#### **Reason for Refusal 6**

- 5.7 Development Parcel Central (DPC) would constitute a cul-de-sac development with only a single point of vehicular access unless and until an additional point of access on to Andover Road was provided. As this application is only for part of the allocated site, it represents piecemeal development and is inadequate in terms of permeability and connectivity.
- 5.8 Proposals for emergency access to DPC are unacceptable, inappropriate and unsatisfactory in highway and other terms and would cause unnecessary substantial material harm to a range of interests of acknowledged importance and would fail to deliver a satisfactory form of development.

#### **Reason for Refusal 7**

- 5.9 The application has not provided sufficient information to demonstrate that the proposed development would not result in a severe impact on the A34 that would require mitigation.

#### **Reason for Refusal 8**

- 5.10 The proposed development does not provide acceptable indications, and therefore sufficient confidence and certainty, that it will not cause avoidable deterioration of and harm to ancient woodlands on the Site.

#### **Reason for Refusal 9**

- 5.11 The proposed development will cause harm to a number of irreplaceable priority habitats comprising ancient and veteran trees and a number of other trees that are the subject of a Tree Preservation Order, without satisfactory justification and compensation or mitigation.

#### **Reason for Refusal 10**

- 5.12 The area of land identified for the expansion of Park House School results in the loss of trees and hedgerows (including an ancient tree) that could be avoided by an increase in the area proposed or an alternative proposal. Accordingly, the proposal is unacceptable as it fails to



make appropriate secondary education provision to mitigate the needs of the development and to ensure the satisfactory provision of a sports pitch.

**Reason for Refusal 11**

- 5.13 Insufficient regard has been given to post construction adverse impacts on existing retained habitats. The proposed development has the potential to have adverse impacts on the local natural environment, and such impacts are not adequately addressed or mitigated. Consequently, the proposed development is unacceptable in terms of ecology and biodiversity.

**Reason for Refusal 12**

- 5.14 Insufficient information has been provided regarding the likely air quality impacts of the proposed development on European Designated Special Areas of Conservation.

**Reason for Refusal 13**

- 5.15 Insufficient information has been provided in respect of surface water drainage and as such a full consideration of the impact of the proposed development in these terms is not possible. Accordingly, the proposed development is considered unacceptable.

**Reason for Refusal 14**

- 5.16 A satisfactory Section 106 planning obligation has not been agreed to deliver the necessary infrastructure, mitigation and enabling works, in terms of affordable housing, travel plan, highway works including pedestrian and cycle facilities (off-site), country parkland, public open space and play facilities, sports pitch provision, other green infrastructure, public transport, primary and secondary education, healthcare and local centre, including community and commercial uses.

**Comment**

- 5.17 It is instructive to note that a great many of these reasons for refusal arise from consultation responses received from internal consultees that were only made available to the Applicants in the days prior to the LPA indicating on the 18<sup>th</sup> September 2020 that they would not permit the Applicants to respond to the comments made therein or to provide the additional information sought by those and other consultees (for example Highways England/Hampshire County Council in respect of Reason for Refusal 7 and Natural England in respect of Reason for Refusal 12). The LPA also indicated in that correspondence that it would advise consultees not to



engage with the Applicants in respect of the application.

- 5.18 Certain of the reasons for refusal depart from the position adopted by the LPA in respect of previous planning applications at Sandleford Park (for example, the Valley Crossing being capable of being considered at the reserved matters stage, the location of the NEAP/LEAP being acceptable, compliance with CS15 and the extent to which low-carbon or renewables energy needs to be provided), raising the concern as to the consistency of decision making by the LPA.
- 5.19 Moreover, the LPA has not provided any comments on the draft Section 106 planning obligation prior to making its decision. Similarly, it is not clear that the LPA has considered the extent to which planning conditions could address comments from consultees. Whereas, again, discussion of obligations and conditions would have assisted all parties and potentially have addressed certain of the reasons for refusal.
- 5.20 It is not clear to the Appellants how the LPA can assert that it has engaged positively with the application, with this being an allocated site in the Core Strategy.
- 5.21 The Appellants intend to address each of the LPA's reasons for refusal in its evidence, unless common ground can be achieved that would see certain of those reasons not pursued through the Appeal.





## 6 The Appellants' Case

6.1 Having regard to the Reasons for Refusal summarised in Section 5, the following paragraphs provide in summary form the Case the Appellants will make through the Appeal to justify the grant of planning permission.

### Principle of Development

6.2 The Appeal Site is a substantial part of the Sandleford Park urban extension allocated for development in the District Council's Core Strategy; the principle of the Site's development is established by Policy CS3 of the Core Strategy. It is contiguous with Newbury's built up area and its development for housing and associated uses would be wholly consistent with the Spatial Strategy in Policies ADPP1 and ADPP2. The Appeal Site is specifically identified as part of the housing supply strategy and development at Sandleford is anticipated up to and beyond 2026, thus contributing to Policy CS1 which requires at least 10,500 dwellings to be provided over the plan period.

6.3 Whilst an individual policy (CS15) is considered to be out-to-date, the Core Strategy as a whole remains an up-to-date Development Plan when considered in the round and alongside the NPPF and relevant evidence of objectively assessed need for housing in the District.

6.4 The Appeal Scheme has been framed by the Core Strategy's requirements listed in Policy CS3 and either delivers the measures identified as part of the scheme or facilitates their provision via Section 106 planning obligations or planning conditions.

6.5 The Core Strategy is supported by a Supplementary Planning Document which sets out development and design principles for Sandleford Park and includes a Framework Masterplan to guide development proposals. The Appeal Scheme accords with these principles where relevant to an outline application and provides a framework for more detailed design and management measures through subsequent reserved matters applications, the discharge of planning conditions and planning obligations.

### The Benefits of the Proposed Development

6.6 Granting planning permission for the proposed development would accord with the Development Plan, consistent with the plan-led system. The Appeal Scheme is framed by Policy CS3 of the Core Strategy and therefore delivers the following benefits:



### **Housing**

- i. 1,000 new homes located at the District's main urban area where new housing is intended to be concentrated. This will contribute towards housing supply in the short term and provide surety of supply over the longer term, as intended by the Core Strategy.
- ii. 40% affordable housing in accordance with Policies CS3 and CS6 with a mix that meets the identified need in the Strategic Housing Market Assessment and of a tenure that meets the Council's Supplementary Planning Document (70% rent and 30% intermediate housing).
- iii. A predominance of family housing – 2-bed, 3-bed and 4-bed housing – which is intended to attract younger demographics to the South of Newbury to counter the ageing population in the District and increase available workforce.
- iv. 80 extra care housing units that will contribute to meeting an unmet need for such accommodation in the District and its changing demography as the number of elderly people is projected to grow in the longer term.

### **Green Infrastructure**

- v. 86 hectares of green infrastructure to be laid out as a Country Park; this will both protect the sensitive landscape in perpetuity and the registered historic landscape setting of the former Sandleford Priory, whilst also providing a substantial recreational resource for future residents of the development as well as existing communities.
- vi. A bespoke long-term management and maintenance plan for the Country Park and areas of Green Infrastructure including the employment of a warden.
- vii. A green infrastructure strategy that accords with the Biodiversity Opportunity Area and delivers net gain in biodiversity.
- viii. A surface water drainage strategy that employs SUDS techniques to manage run-off and deliver water quality improvements with biodiversity benefits.

### **Supporting Infrastructure**

- ix. Investment in community infrastructure with new retail, employment and community facilities to be provided at the Local Centre.
- x. The provision of land to enable the enlargement of Park House School's sporting facilities



to accommodate secondary school pupils from the proposed development, development at New Warren Farm and existing spaces required by the District Council (40 spaces). The School will be able to make available these additional sports facilities for community use.

- xi. Financial contributions towards improvements to educational facilities at Park House School that will renew classrooms and ancillary accommodation to the benefit of all of the School's pupils.
- xii. Financial contributions towards local healthcare facilities and sports provision.
- xiii. A Community Infrastructure Levy anticipated to be in the region of £6m towards other infrastructure provision.

### **Highways and Transportation**

- xiv. Improvements to local walking and cycling routes between the Site and local employment destinations and other key destinations such as Newbury town centre, nearby facilities and retail. The provision of way-finding signage in the form of 'gateway maps' and directional signs and road markings will enhance the legibility of routes and provide continuity between the site and surrounding facilities. Dedicated signalised pedestrian crossings at local junctions to improve pedestrian accessibility.
- xv. The provision of a new crossing on the A339 adjacent to the PROWs access onto the A339, providing a dedicated crossing facility for pedestrians and cyclists wishing to access St Gabriel's School, Greenham Business Park and the walking routes on the eastern side of the A339
- xvi. Investment in bus based public transport to enable the diversion of either the existing 103 service or a new service that would provide frequent and convenient journeys between the Site and the town centre.
- xvii. Additional travel plan measures to encourage sustainable modes of travel.
- xviii. The provision of off-site junction improvements as required by the Infrastructure Delivery Plan that supports the development of the whole strategic site.
- xix. A financial contribution towards construction of an additional means of vehicular access from the A339 to the Site to complement Local Enterprise Partnership funding secured by the Council.



### **Economic Benefits**

- xx. Economic benefits during the construction phase which will include new training and apprenticeship schemes.
- xxi. Employment at the Local Centre and Primary School.

### **Comprehensive Development and the co-ordinated provision of Infrastructure**

- 6.7 Whilst the LPA allege that the proposed development does not ensure the holistic comprehensive development of the Sandleford Park Strategic Site (Reasons for Refusal 1, 2, 14), the Appeal Scheme has been designed to align with the development proposals advanced for the remaining part of the Sandleford allocation at New Warren Farm. The various combined parameter plans for this appeal and the New Warren Farm application illustrate the extent to which these two schemes represent a coordinated and comprehensive development proposal. In the case of the Appeal Scheme, it provides infrastructure to support the development proposals at New Warren Farm, for example the Country Park which is wholly within the Appeal Site, the local centre, and land for the expansion of Park House School. It also provides a means of access up to the boundary of the site. Neither scheme prejudices the other.
- 6.8 The infrastructure commitments made by the Appellants and to be incorporated into the Section 106 Planning Obligation ensure that necessary infrastructure is provided in a timely manner. Where relevant, those commitments address the needs arising from the combined effects of development across the whole allocated site.
- 6.9 Whilst the current planning application does not relate to the whole allocation, when considered in the context of the reasoning underlying the reference to a single planning application in Policy GS1, the development can be delivered comprehensively without prejudicing either the infrastructure requirements or the balance of the allocation.

### **Green Infrastructure**

- 6.10 Approximately 74% of the Appeal Site – some 86hectares - will be in the form of greenspace accessible to new and existing residents and will include Country Parkland, retained woodlands, equipped areas of play and green links across the site. This accords with the Framework Masterplan in the LPA's SPD. The Strategic Landscape and Green Infrastructure Plan and the Strategic Landscape and Green Infrastructure Design and Management Plan provide a framework for the preparation of Landscape and Ecological Management Plans later in the



development management process. Contrary to RFR2 and 3, the Appeal Scheme accords with Policy CS18.

### Affordable Housing

- 6.11 The Appellants have committed to providing the level of affordable housing sought by Policy CS6 and the tenure split and mix sought by the Council. The Council's Housing Development Officer supports the development proposals. It is important to note that paragraph 5.27 of the Core Strategy acknowledges the definition of affordable housing in the NPPF which includes both social rent and affordable rent. Paragraph 5.32 acknowledges that the affordable rent tenure will be taken into account when determining planning applications. It goes on to refer to the tenure split in the policy as a target to ensure flexibility.
- 6.12 In RFR 4, the Council does not recognise that the Affordable Housing Scheme which is to be agreed for each phase, allows for the determination of tenure split at that time and does not preclude Social Rent from achieving the 70% in the Policy or require the provision of Affordable Rent. Rather it allows a measure of flexibility to determine tenure at the time individual phases are brought forward. The Appeal Scheme therefore accords with Policy CS6.
- 6.13 A cascade mechanism in a S106 Planning Obligation is commonplace and allows flexibility to deal with changing circumstances. In the context of RFR14, the Appellants will bring forward a planning obligation to secure *inter alia* the provision of affordable housing.

### Housing Mix

- 6.14 The Appeal Scheme will provide predominantly family housing, the demographic and labour market benefits of which are supported by the Council's Economic Development Officer. In addition, the Extra Care housing responds to the need for such accommodation in the District and is supported by the Council's Adult Care Services. The Appeal Scheme accords with Policy CS4.

### Code for Sustainable Homes

- 6.15 RFR5 alleges that the proposed development does not demonstrate a high-quality and sustainable design or that it will be built to high environmental standards.
- 6.16 The Appeal Scheme does not fully accord with Policy CS15 concerning Sustainable Construction and Energy Efficiency which requires new housing development from 2016 to achieve Code for Sustainable Homes Level 6. Since the Core Strategy was adopted, the Code for Sustainable



Homes has been withdrawn by Government and Building Regulations Part L is currently being revised in order to significantly reduce permitted levels of carbon dioxide emissions beyond the current standards. The residential element of the Appeal Scheme will need to be constructed in accordance with the prevailing Building Regulations Part L, which, following the withdrawal of the Code, is now the Government's primary mechanism for reducing carbon dioxide emissions from new residential development in order to help meet national targets.

- 6.17 In accordance with Policy CS15, BREAAAM pre-assessments have been provided to the Council as part of the application to demonstrate how the non-residential buildings could achieve 'Excellent' status. No adverse comments have been received in respect of these.
- 6.18 Orientation of dwellings relates to layout, which is a 'reserved matter'.

## Design

- 6.19 The Appellants' Design and Access Statement provides detailed information in respect of the design principles that underpin the proposed development, consistent with Policy CS14 and the urban design principles specified in the SPD. Contrary to RFR6, the Appeal Scheme represents good design and accords with Policy CS14.
- 6.20 RFR6 alleges that the proposed development, and in particular the permeability and connectivity of DPC, is inadequate in urban design terms and the Valley Crossing would have a substantial material harm to a range of issues. The Valley Crossing between the Northern and Central Development Areas shown on the Land Use and Access Parameter Plan will introduce a built structure into this part of the site's landscape. Its location is entirely consistent with the SPD's Framework Masterplan. The design of the Valley Crossing is shown in an illustrative form in the Transport Assessment and Design and Access Statement and will be subject to detailed design as part of the reserved matters application; a principle agreed with the Council previously. The design of the Valley Crossing will need to have regard to the Council's highway requirements in terms of accessibility between the development parcels, emergency access, landscape, drainage and nature conservation considerations. The Appellants have considered the comments in respect of the Valley Crossing and have prepared a Study to illustrate the potential options, and this is attached at *Appendix 4*.

## Transport and Highways

- 6.21 The location of the site is wholly in accordance with the Core Strategy's Spatial Strategy which intends that the majority of new development is focused at Newbury as a main urban area with



a range of services and facilities.

- 6.22 The Appellants have prepared a Transport Assessment incorporating the outputs of the District Council's highway modelling and identified mitigation measures derived from this and reflecting the infrastructure requirements in Appendix D of the Core Strategy.
- 6.23 The opportunities for sustainable transport modes have been taken up which will benefit future and existing residents. Safe and suitable access can be achieved.
- 6.24 There are no unacceptable impacts on highway safety and residual cumulative impacts on the highway network are not severe. There is no highways or transport reason why the planning application should not be granted consent. The Appeal Scheme accords with Policy CS13.
- 6.25 Reflecting the fact that the Council did not provide the (then) Applicants response to Hampshire County Council and precluded discussion with Highways England, and hence RFR7, the Appellants will seek to reach agreement with these parties prior to the Appeal being heard. Highways England has by now indicated that it does not object to the proposed development's impact on the strategic highway network.

### Trees and Ancient Woodland

- 6.26 Each of the Ancient Woodlands within or adjoining the Application Site are afforded a buffer of 15 meters. This accords with the extent of buffer required by the LPA's SPD and the minimum buffer recommended by Natural England. The illustrations within the Design and Access explain the interface between built development, the buffer and the woodland and the precise arrangement of built development where it adjoins Ancient Woodland will be a matter determined at the reserved matters stage. The Appellants have updated its Arboricultural Assessment in response to comments from the Council's Tree Officer, and this accompanies the submitted Appeal. Natural England do not object to the proposed development in terms of its impact on Ancient Woodland.
- 6.27 T34 shown on the Arboricultural Assessment is an ancient tree that will need to be felled to enable the expansion of Park House School. The expansion of Park House School is a policy requirement in the Core Strategy; this will require re-modelling of the school to provide new and additional classroom spaces within the existing curtilage of the School and new playing field land adjacent to it. This new playing field land cannot be provided contiguous with the School's existing boundary at any other point. The Appellants note that the Council suggest that T34 could be retained if the playing field is sited differently and have considered this



further. Attached at *Appendix 5* is a drawing which shows how this could be achieved; whilst this enlarges slightly the area of the land safeguarded for Park House School, this arrangement remains in accordance with the Land Use and Access Parameter Plan.

- 6.28 Significant new planting is proposed within the Country Park to mitigate and compensate for the loss of trees. This accords with para 175c of the NPPF.
- 6.29 Landscaping is a ‘reserved matter’ and the Appellants’ suggested planning conditions intend that Landscape and Ecological Management Plans are prepared for each phase as part of the reserved matters process. Similarly, the detailed design of the Country Park will be required by way of planning condition. This approach allows for detailed design considerations and mitigation planting to be determined at that time and in the context of strategic level documents prepared as part of the outline planning application (Strategic Landscape and Green Infrastructure Plan, Landscape and Green Infrastructure Design and Management Plan, Ecological Mitigation and Management Plan). These are measures that are consistent with the design approach anticipated by the SPD.
- 6.30 Contrary to RFR 2, 3, 8, 9 and 10, the proposed development accords with Core Strategy Policies CS3, CS17 and CS18 in respect of landscape and visual effects and impacts on trees and woodlands.

### Nature Conservation and Biodiversity

- 6.31 The Ecological Impact Assessment which forms part of the Environmental Statement describes the extent of assets within and in close proximity to the Appeal Site and how the development proposals will conserve and enhance its biodiversity value. Important habitats are protected in accordance with the principles of the LPA’s SPD. The Ecological Mitigation and Management Plan provides a framework for detailed consideration later in the development management process. The Biodiversity net gain calculation returns a positive score. Contrary to RFR11, the Appeal Scheme accords with Policy CS17.
- 6.32 The LPA chose not to provide the Appellants’ further information regarding air quality impacts on the Special Areas of Conservation to Natural England prior to determining the Application, hence RFR12. The Appellants’ assessment illustrates that the air quality effects of increased traffic at these locations will be negligible. The Appellants provided a copy of the information it had sent to the Council directly to Natural England who responded on the 13<sup>th</sup> November 2020 indicating that they agree with the conclusions [of the Technical Note] that air quality impacts





on nearby European sites can be ruled out both alone and in combination.

### Flood Risk

6.32.1 Sandleford Park is located within Flood Zone 1. The risk of flooding has been assessed in the FRA submitted with this planning application and is considered to be low. The Appellants' Drainage Strategy is based on SuDS which will also provide other benefits, including biodiversity enhancement. Such features will be provided within the area of built development and the Country Park, drawing from the options identified in the Drainage Strategy. The Environment Agency do not raise concern regarding the proposed development either in respect of flood risk or its approach to surface water drainage. Contrary to RFR13, the Appeal Scheme accords with Policy CS16.

### Historic Landscape

6.33 The arrangement of land uses reflects the principle established in Policy CS3 and illustrated on the Framework Masterplan in the LPA's SPD; new development is located to the north and west of the site with a substantial area of green infrastructure in the south eastern part. This arrangement respects the landscape and sensitivity of the wider site and protects the registered historic landscape and setting of the former Sandleford Priory. Neither Historic England, the Council's Conservation Officer or the Berkshire Garden Trust raise objection to the citing of built development or the design philosophy of the Country Park relative to Sandleford Priory. The Appeal Scheme accords with Policy CS19.

### Environmental Nuisance, Pollution Control

6.34 The proposed development does not give rise to environmental issues that would conflict with Policies OVS 5 and OVS 6 of the West Berkshire Local Plan saved policies. The Council's Environmental Health Officer has proposed various conditions to control and limit potential effects.

### Minerals

6.35 Whilst the Appeal Site is in an area known to contain sand and gravel deposits, the Council's Minerals and Waste Officer does not object to the proposed development and has agreed a condition to secure a minerals extraction statement and management plan prior to the commencement of any buildings on the Site. This will secure the incidental prior extraction of viable underlying mineral deposits and would accord with the Minerals Local Plan.



## Planning Obligations

- 6.36 The Appellants recognise that infrastructure provision is an important element of the development of this Site and has set out infrastructure commitments to the LPA which are incorporated into a Draft Section 106 Planning Obligation. Further work is required to refine this to reflect any comments that the LPA might have in respect of the Draft but this can be undertaken in the usual manner prior to the Appeal being heard in due course. The Appellants anticipate that this will address RFR14.

## Synthesis

- 6.37 Taken individually and together, the above illustrates how the proposed development accords with the Development Plan when read as a whole and accordingly justifies the grant of planning permission.
- 6.38 There are no material considerations individually or together that would justify planning permission being refused.
- 6.39 To the contrary, the Appeal Scheme's contribution to housing supply is of significant importance. Whilst the Council can demonstrate a five-year supply of housing land this does not diminish the status of the Appeal Site in the Development Plan, not least because Policy CS1 is expressed as a minimum requirement, and the Sandleford Park Site was intended to provide housing supply over the longer term in any event.
- 6.40 Housing completions, when considered cumulatively over the plan period to date have not exceeded the per annum requirement such that new housing is not required, indeed there is a slight deficit over the period 2006/7 to 2018/19. Whereas the affordability of housing in West Berkshire has worsened. The objective to significantly boost the supply of new housing in the NPPF is entirely valid and the Appeal Scheme will contribute towards this in a manner consistent with the plan-led process.
- 6.41 The LPA continue to refer to development at Sandleford Park providing housing in the longer term as was intended by the Core Strategy. The January 2020 Annual Monitoring Report refers to housing at Sandleford Park later in the plan period and assumes a contribution of 200 units by 2026. Housing delivery at Sandleford Park beyond 2026 is a foundation of the Core Strategy and Policy CS3.
- 6.42 Moreover, the Appeal Scheme is acknowledged to have socio-economic benefits, variously in



terms of the housing mix proposed and the predominance of family housing, the provision of affordable housing and meeting the need for extra care housing.

- 6.43 The Council has commenced a review of its Local Plan. It first published a Regulation 18 consultation in December 2018 and have issued a further consultation in December 2020, prior to a Regulation 19 Plan expected in 2021. There is no sustainable argument that granting planning permission is premature to the Local Plan Review. The December 2020 consultation document carries forward key principles from the Core Strategy, including the Spatial Strategy's focus on Newbury and the Sandleford Park allocation itself.
- 6.44 Paragraph 6.29 of the consultation document confirms that the Council consider *"that Sandleford Park is the most appropriate location for strategic housing delivery in Newbury"*. Paragraph 6.30 states: *"Whilst the site has not delivered housing to date, the Council is confident that the site will deliver housing within the plan period of the Local Plan Review and is actively working to ensure this"*.
- 6.45 It is instructive to note that the calculation of the Local Housing Need for the District by reference to the Standard Method in the NPPF (revised in 2020) indicates an annual requirement consistent with the level of housing in the Core Strategy. In these terms, the housing strategy in the Core Strategy can be seen to be up-to-date. Equally, there haven't been any material changes to the characteristics of the District that would suggest the spatial strategy and the role and function of Newbury is any different or less suitable as the focus for new development.
- 6.46 Whilst the Council has produced an Environment Strategy, this does not detract from or replace the statutory weight of the Development Plan. The Environment Strategy's references to 'Planning and Development' are framed in the context of the Local Plan Review along with measures to be incorporated into development schemes coming forward at this time to reduce energy consumption, reduce carbon emissions and increase renewable energy. These are not measures that justify planning permission being refused.

### Third Parties

- 6.47 As was previously the case, the planning application has given rise to a number of comments and objections from local residents and organisations, which are summarised as follows:
- a) The principle of development in this location and the scale of development proposed. There is no need for such an amount of new housing at Newbury and brownfield sites should be used first. New development will harm the character of the historic market town.



- b) Overdevelopment of the site, too dense and adverse impacts on residential amenity of neighbouring properties.
  - c) The Council's recently published Environment Strategy does not support this development and the Core Strategy is out of date.
  - d) The loss of countryside, habitats and wildlife, and historic landscape associations. Unacceptable impact on ancient woodland and veteran trees.
  - e) The impact of additional traffic from the development on the highway network – both in terms of congestion and highway safety, particularly Monks Lane, the A339 Newtown Road and the A343 Andover Road.
  - f) Sustainable modes of travel are not considered adequate to support a development of this scale.
  - g) Local community infrastructure and physical infrastructure (water and sewerage) is not sufficient to support the increase in population.
  - h) Loss of and adverse impact on public rights of way.
  - i) The adverse effect of construction traffic.
- 6.48 A number of the comments cite the fact that a single planning application is required for the allocated site and that its absence means the development proposals have not been comprehensively planned.
- 6.49 Certain comments also refer to Warren Road not being suitable as a means of vehicular access to the development. Such comments relate directly to the Donnington New Homes' application for development at New Warren Farm rather than the Appeal Scheme.
- 6.50 In evidence, the Appellants will address the above points with reference to the status of the Site in the Development Plan, the extent to which the proposed development accords with the policies in the Core Strategy and the Development Principles in the Council's Supplementary Planning Document and by reference to the planning application documents and relevant comments from statutory consultees. None of the matters raised by third parties are considered to justify the planning application being refused.



## 7 How should the Appeal be heard?

7.1 Having regard to Annex K of the Planning Inspectorate's Procedural Guide to Planning Appeals, the Appellants are of the view that the Appeal should be heard by way of a **Public Inquiry** for the following reasons:

7.1.1 The Appeal Site forms a substantial part of the land allocated for development in the Core Strategy and the Appeal Scheme provides land use components consistent with Core Strategy's site-specific policy and is laid out generally in accordance with the LPA's published Supplementary Planning Document. However, the location, nature and extent of the Appeal Site and the scale of the proposed development give rise to the need to present technical evidence to explain the development proposals.

7.1.2 The importance of such technical evidence is underpinned by the position which the LPA have previously taken in respect of the Appellants development proposals and the concerns expressed as to the Appeal Scheme being granted planning permission separately from other land within the allocated site. The LPA refused planning permission in 2017 for similar development proposals and failed to determine an application submitted in 2018.

7.1.3 This gives rise to a range of planning and environmental considerations that the appointed Inspector will need to receive information about both from the Appellants and the LPA. This will include, for example:

- i. how the development proposals accord with relevant development plan policies, including the site-specific policy and the extent to which material considerations justify a different approach;
- ii. whether the Appeal Scheme has been co-ordinated with development proposals on other land within the allocated site that is also subject to a planning application;
- iii. accordingly, the extent to which granting planning permission for the proposed development is consistent with and enables the comprehensive development of the allocated site;
- iv. whether the extent to which the Appeal Scheme will provide, in a timely manner, infrastructure, either as direct provision, such as the country park, or indirectly, such as



off-site highway improvements and secondary school improvements, that meets its needs and, furthermore, facilitates rather than prejudices the development of the allocated site.

7.1.4 Moreover, and reflecting the character of the Appeal Site, the LPA's SPD establishes a range of development and design principles that direct the arrangement of land uses. In many instances, the way which the Appeal Scheme corresponds with the SPD and its framework plans is the subject of objection by local residents and organisations. This includes, for example, means of access, the citing of development, design principles, and landscape and ecological conservation measures. The development proposals are locally controversial and there is likely to be a significant local interest in the Appeal proceedings.

### Evidence to be called by the Appellants

7.2 In the context of the LPAs Reasons for Refusal and other comments, the Appellants intend, at the present time, to prepare evidence in respect of the following matters:

- Environmental Considerations (landscape, drainage, ecology, arboriculture)
- Education
- Masterplanning
- Transport
- Planning

7.3 The way in which evidence is presented will depend on the stance taken by the LPA in response to this Appeal and common ground reached in respect of various matters. As the LPA appear to take fundamental points in objection to the proposed development the evidence will need to be heard by way of conventional Inquiry manner with cross examination. This will need to be reviewed as part of the case management conference in due course.



## 8 Documents

8.1 The following provides a list of the Documents the Appellants may refer to through the course of the Appeal:

### **Planning Applications**

Documents associated with Planning Application 20/01238/OUTMAJ

Documents associated with Planning Application 18/00784/OUTMAJ

Documents associated with Planning Application 18/00828/OUTMAJ (New Warren Farm)

Documents associated with Planning Application 19/02707/FUL Improvements to Warren Road

Documents associated with Planning Permission 17/03434/COMIND Highwood Copse Primary School

Documents associated with Planning Permission 14/02416/FUL Widening of Warren Road

Relevant planning history associated with development at Sandleford Park

### **Planning Policy**

West Berkshire Core Strategy and associated documents

West Berkshire Housing Site Allocations Development Planning Document

West Berkshire District Local Plan 1991-2006 (Saved Policies 2007)

Replacement Minerals Local Plan for West Berkshire

Waste Local Plan for Berkshire adopted December 1998

West Berkshire Council Community Infrastructure Levy

Sandleford Park Supplementary Planning Document

Other Supplementary Planning Policy Documents

Local Plan Review Regulation 18 consultation documents (2018)

Local Plan Review 2020-2037: Emerging Draft (2020)

Local Development Scheme

National Planning Policy Framework

Planning Practice Guidance

White Paper Planning for the Future

### **Other Documents**

West Berkshire Annual Monitoring Reports

West Berkshire five-year land supply estimate

Landscape Character and Landscape Sensitivity documents

Guidelines for Landscape and Visual Assessment (3<sup>rd</sup> edition)

Other technical documents relevant to the subject matters referred to in the application documents



***LRM Planning  
December 2020***





## **Appendix 1: Extent of Strategic Site Allocation**

# West Berkshire Core Strategy Policies Map – Extract – Sandford Park Strategic Site

**Map Legend**

- DISTRICT BOUNDARY
- SETTLEMENT BOUNDARY
- CONSERVATION AREA
- TOWN CENTRE COMMERCIAL AREA
- ROAD SCHEME
- LOCAL GEOLOGICAL SITE
- LOCAL GEOLOGICAL SITE
- DRIFT GEOLOGY - PLATEAU GRAVEL\*
- DRIFT GEOLOGY - VALLEY GRAVEL\*
- MINERAL PREFERRED AREA
- WASTE PREFERRED AREA
- GREENHAM AND CROOKHAM COMMONS
- SPECIAL AREA OF CONSERVATION
- SITE OF SPECIAL SCIENTIFIC INTEREST
- AREA OF OUTSTANDING NATURAL BEAUTY
- THAMES BASIN HEATH S.P.A. 9km BOUNDARY
- THAMES BASIN HEATH S.P.A. 7km BOUNDARY
- LOCAL WILDLIFE SITE
- BIODIVERSITY OPPORTUNITY AREA
- HISTORIC PARK AND GARDEN
- CRITICAL DRAINAGE AREA
- KENNET AND AVON CANAL
- FLOOD ZONE 3 (as of July 2012)
- FLOOD ZONE 2 (as of July 2012)
- PRIMARY SHOPPING FRONTAGE
- RETAIL AREA AND WAREHOUSING
- RAIL INDUSTRY THEALE
- PROTECTED EMPLOYMENT AREA
- PARKWAY AND THE WHARF
- NEWBURY BATTLEFIELD
- JUNCTION 13 CHIEVELEY
- GREENHAM COMMON COMMERCIAL AREA
- PROPOSED STRATEGIC SITE - NEWBURY RACECOURSE
- PROPOSED STRATEGIC SITE - SANDLEFORD
- INNER LANDUSE PLANNING CONSULTATION ZONE
- MIDDLE LANDUSE PLANNING CONSULTATION ZONE
- OUTER LANDUSE PLANNING CONSULTATION ZONE

**Settlement Hierarchy**

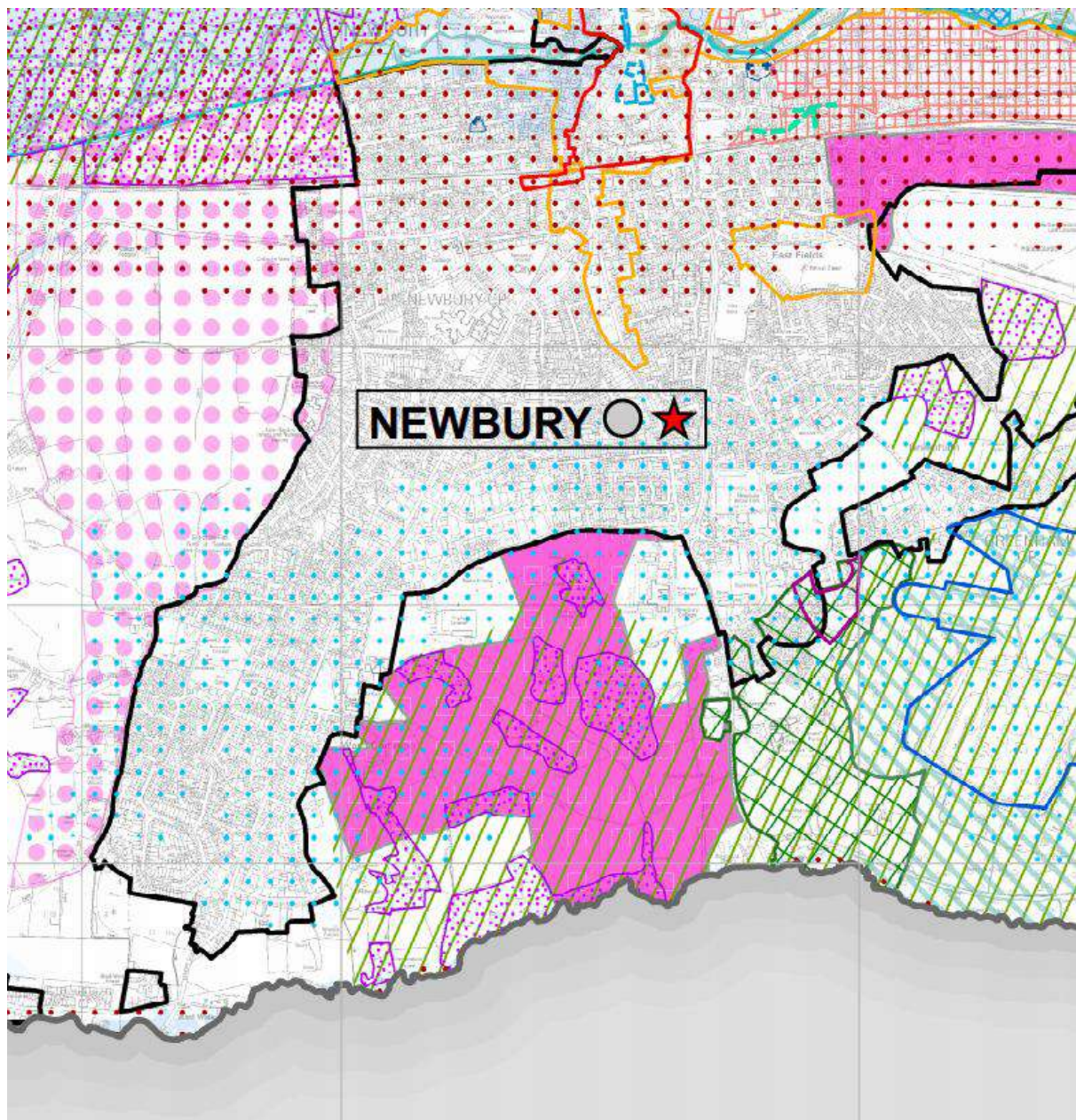
- URBAN AREA
- RURAL SERVICE CENTRE
- SERVICE VILLAGE

**Hierarchy of Centres**

- MAJOR TOWN CENTRE
- TOWN CENTRE
- DISTRICT CENTRE

\* Figures 9.10, 11, 12, 13 and 14 of the Replacement Strategic Land Use Plan for Berkshire (Local Plan 2016-2030)

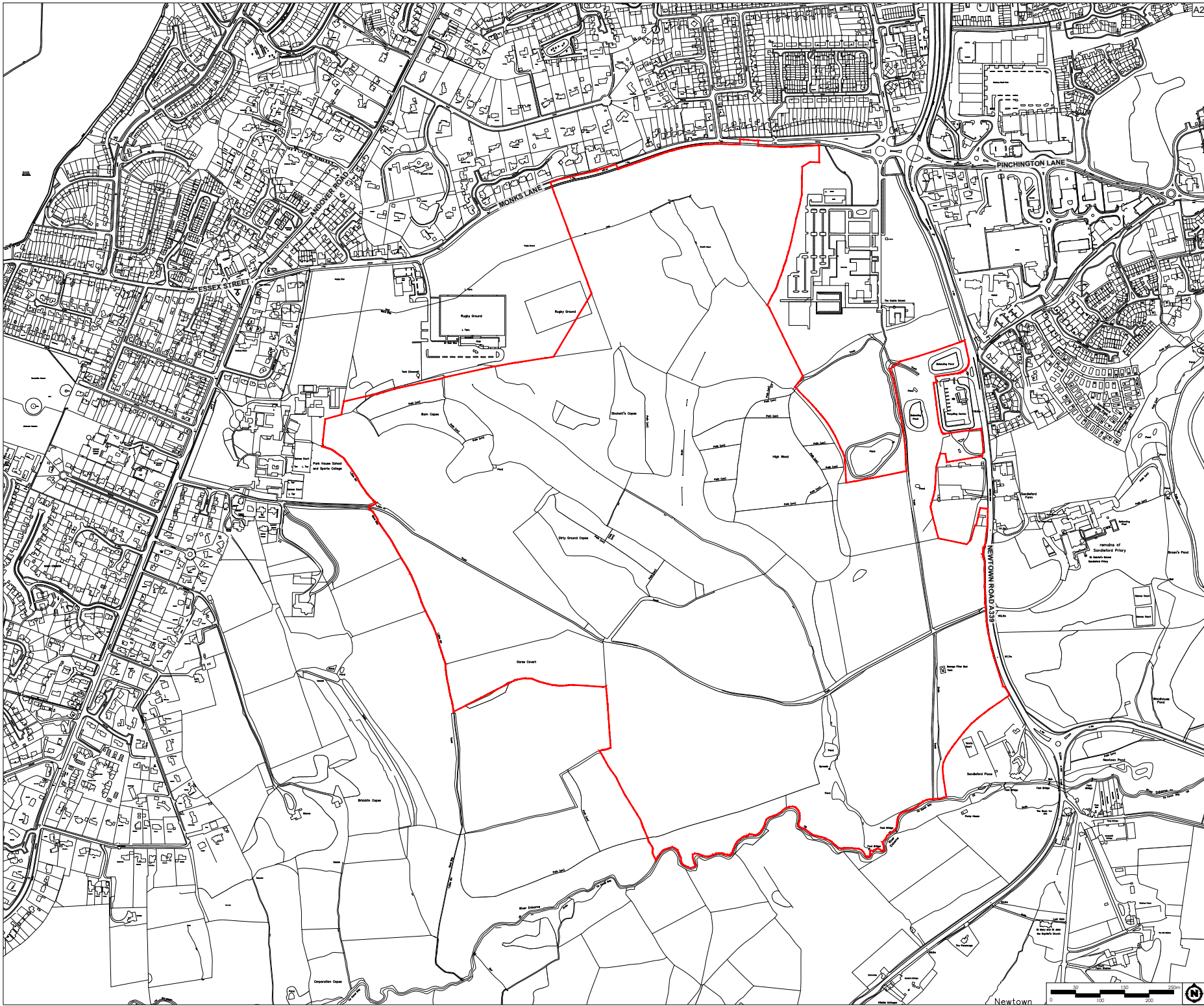
**West Berkshire**  
Local Development Framework - Proposed Map  
produced by West Berkshire Council 15/1/2016






**Appendix 2: Site Location Plan**





KEY - to be read in conjunction with plans PP02, PP03 and PP04  
 Sandleford Park Application Boundary

Final Planning Issue

CLIENT  
**BLOOR HOMES**

PROJECT TITLE  
 Sandleford Park,  
 Newbury  
 DRAWING TITLE  
 PARAMETER PLAN  
 Application Boundary

DATE	DRAWN	CHECKED	AUTHORISED
06 Apr 2018	BD	AB	AB
NUMBER	REV.	SCALE	
14.273/PP01	B	1:5000 @ A2	

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cardiff | colchester | london | twickenham | wokingham

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 Boyer Planning Ltd, Crowthorne House, Nine Mile Stile, Wokingham, Berkshire, RG40 3JZ



**Appendix 3: West Berkshire Council Decision Notice 20/01238/OUTMAJ 13<sup>th</sup> October 2020**

LRM Planning  
Owen Jones  
22 Cathedral Road  
Cardiff  
Wales  
CF11 9LJ

**Applicant:**  
Bloor Homes and Sandford  
Farm Partnership

### **PART I - DETAILS OF APPLICATION**

**Date of Application**

2nd June 2020

**Application No.**

**20/01238/OUTMAJ**

#### **THE PROPOSAL AND LOCATION OF THE DEVELOPMENT:**

Outline planning permission for up to 1,000 new homes; an 80 extra care housing units (Use Class C3) as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150 sq m, B1a up to 200 sq m) and D1 use (up to 500sq m); the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works. Matters to be considered: Access.

Sandleford Park, Newtown Road, Newtown, Newbury

### **PART II - DECISION**

**In pursuance of its powers under the Town and Country Planning Act 1990, West Berkshire District Council REFUSES OUTLINE planning permission for the development referred to in Part I in accordance with the submitted application form and plans, for the following reason(s):-**

1. The proposed development fails to ensure the holistic comprehensive development of the Sandleford Strategic Site Allocation (SSSA), with a view to maximising its potential as a well-planned and sustainable urban extension. The submitted application documentation fails to provide adequate certainty and confidence that this proposal will deliver the required comprehensive development of the SSSA as a whole, along with the co-ordinated and timely delivery of the associated infrastructure, services and facilities necessary to mitigate its impact across the entirety of the SSSA and beyond. The unacceptability of the proposal is exacerbated by numerous inconsistencies in the contents of the various submitted plans and reports, as well as in relation to the proposals for the adjoining site.

The failure to secure the comprehensive development of the SSSA renders this proposal unacceptable and contrary to:- i) Policy GS1 of the West Berkshire

Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); ii) the Vision, the Strategic Objectives and the Development Principles, including S1, of the Sandleford Park Supplementary Planning Document (Sandleford Park SPD, adopted March 2015); and iii) Policy CS5, CS13, CS14, CS17, CS18 & CS19 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012).

2. Policy CS3 requires infrastructure improvements to be delivered in accordance with the West Berkshire Infrastructure Delivery Plan (IDP, 2016). The IDP identifies the provision of green infrastructure to be necessary infrastructure. Development principle L1 of the Sandleford Park SPD requires a planning application to be accompanied by a clear Strategic Landscape and Green Infrastructure Plan for the whole of the allocated site to integrate the development with the landscape and green infrastructure, and to incorporate the landscape, ecology/biodiversity, drainage and public open space / recreation development principles in the Sandleford Park SPD.

The development proposal fails to secure a consistent Strategic Landscape and Green Infrastructure Plan for the whole of the allocated site.

The proposals for development are uncertain and contradictory, as a consequence of inconsistencies, omissions and unnecessary duplication within and between the relevant submitted drawings and associated reports. For example these include:- green links within the application site and also in relation to the remaining area of the Sandleford Strategic Site Allocation (SSSA); strategic drainage mitigation elements; the location, size and extent of the education land offered as the Park House School extension, in this case proposed to provide a sports pitch; and tree and hedge removals and retention. There is no certainty in the proposal in respect of:- the required mitigation regarding the removal of existing green infrastructure (trees and hedgerow) along Monks Lane frontage to provide the proposed accesses; the future of the important row of mature trees along the southern boundary of Park House School adjoining Warren Road in the context of the need to provide a satisfactory public transport / all vehicle access through to Andover Road.

The unacceptable proposal of piecemeal development of only part of the SSSA gives rise to the need for unnecessary mitigation, which itself would result in harmful impact arising from, for example the proposed emergency access proposals for Development Parcel Central (DPC), incorporated as part of the central valley crossing structure and also the widened cycleway through the country parkland.

The proposed development does not form part of a well-planned comprehensive and satisfactory proposal for the SSSA in accordance with the Sandleford Park SPD, nor does it secure the comprehensive delivery of the intended sustainable urban extension and fails to provide a holistic approach to the landscape, visual impact, green (and other) infrastructure for development of the whole of the SSSA.

For those reasons, this application for only part of the allocated site is considered to prejudice the successful delivery of the development of the SSSA and it is unacceptable and contrary to Policies CS3, CS5, CS14, CS17, CS18 and CS19 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012), Policy GS1 of the West Berkshire Housing Sites Allocations

Development Plan Document (2006-2026) (HSA DPD, adopted May 2017), and the Development Principles, including L1 and F1 of the Sandlesford Park SPD (adopted March 2015).

3. The submitted Landscape and Visual Impact Assessment (LVIA) is unsatisfactory and unacceptable in that it fails to adequately and appropriately assess the landscape and visual impact of the proposed development of the application site, which forms part of a valued landscape. The LVIA was not undertaken using the latest West Berkshire Landscape Character Assessment 2019. As a result, the more up-to-date key characteristics, value attributes, sensitivities have not been identified/updated using the most recent information and this has not informed or influenced the scheme's design. As a consequence, the assessment of effects does not assess the correct Landscape Character Areas (LCAs) (WH2: Greenham Woodland and Heathland Mosaic; or the important interaction with the narrow, but critical UV4: Enborne Upper Valley Floor).

In addition, the LVIA and associated information fail to adequately consider the landscape and visual impact of a number of proposed elements and on a number of existing features, including those listed below:-

- i) the embankment structure within the central valley;
- ii) the suite and extent of encroaching proposals within the northern valley;
- iii) the NEAP and LEAP locations;
- iv) the engineered nature of Sustainable Drainage Systems (SuDS) features, and their close proximity to ancient woodlands;
- v) ancient and other woodlands and their buffers;
- vi) ancient, veteran and category A trees;
- vii) the western access point at the boundary with Sandlesford Park West (SPW);
- viii) the Monks Lane accesses; and
- viii) the creation of emergency accesses and associated works to serve Development Park Central (DPC).

Notwithstanding the above, the submitted LVIA acknowledges that the proposal results in harm, at times significant, to the landscape and visual resources of the site. The proposals fail to take account of key characteristics and special features, which are sensitive and form highly valued components in this complex landscape and they will result in an unacceptable level of harm, with significant impact on the landscape character and visual resources. The application proposals fail to protect or enhance a valued landscape, as set out in NPPF paragraph 170, which also recognises the intrinsic character and beauty of the countryside, including the benefits of trees and woodland.

The lack of an adequate LVIA for the proposed development, and the identified harm to the landscape character and visual resources without sufficient mitigation is contrary to Policies CS14 and CS19 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Vision, Strategic Objectives and the Development Principles in category L of the Sandlesford Park SPD (adopted March 2015).

4. The Council's policy on affordable housing (CS6 of the Core Strategy) requires a 40% on-site provision for major developments on greenfield sites, 70% of which should be for social rented. Although the application satisfies the overall 40%



affordable housing requirement, it proposes that 70% of that provision to be for a mixture of affordable rented and social rented units. In this respect the proposal is unacceptable and unsatisfactory in that it fails to deliver the required proportion of units for social rent, for which there is the greatest need in the District.

In addition Schedule 8 of the accompanying draft Section 106 Legal Agreement submitted by the applicant proposes 80 extra care units (70x 1-bed & 10x 2-bed), which are all to be provided in one location within Development Parcel Central (DPC) and which form part of the affordable housing provision. Schedule 8 of the draft Section 106 stipulates that in the event that it was not feasible to progress the Extra Care Housing, the said units shall become General Affordable Housing Units. However, the unit mix and spatial distribution requirements of General Affordable Housing within the site are substantially different, to that of Extra Care Housing. Unless the proposal were to be considerably adjusted in good time, such a scenario would result in an unacceptable concentration of 80 units with an unacceptable unit mix. The development would fail to create a successful, sustainable, mixed and balanced community and to make satisfactory affordable housing provision.

Furthermore Schedule 8 of the draft Section 106 also provides that, under certain circumstances, the 30% intermediate housing would be allowed to switch to market housing, failing to make the required 40% affordable housing provision. Should the above occur, this would also result in a material change to the description of the development proposed, for which planning permission is hereby sought.

In all three of the above respects the application would be unacceptable and harmful to the community's need for affordable housing. The application therefore fails to make a policy compliant provision of affordable housing and it is contrary to Policies CS3, CS4 and CS6 of the West Berkshire Core Strategy Development Plan Document (Core Strategy adopted July 2012); the Vision, Strategic Objectives and the Development Principles in category F of the Sandford Park SPD (adopted March 2015); and the affordable housing provisions of the West Berkshire Planning Obligations Supplementary Planning Document (PO SPD, adopted December 2014).

5. This major development proposal, on the larger portion of the Sandford Strategic Site Allocation (SSSA), fails to use this significant opportunity to fully exploit the specific potential of the SSSA's inclined south facing orientation, greenfield status and scale to deliver an exemplar development regarding carbon dioxide emissions reduction, in the form of renewable energy generation, and to deliver a zero carbon residential-led mixed use urban extension. In this respect the proposal fails to demonstrate a high quality and sustainable design or that it would be built to high environmental standards. It is considered to be an unsustainable and harmful development, failing to reduce carbon dioxide emissions through the extensive use of renewables on site and otherwise contributing to climate crisis.

In this respect the proposal is anachronistic, unacceptable, inappropriate, inadequate and unsatisfactory. It is contrary to Policies ADPP2, CS3, CS14 and CS15 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); the Vision, Strategic Objectives and Development Principle R1 of the Sandford Park SPD (adopted March 2015); the West Berkshire Corporate Environment Strategy (2019) and associated Declaration of

Climate Emergency and objective to achieve Carbon Neutrality in West Berkshire by 2030.

6. Development Parcel Central (DPC) would effectively comprise a substantial residential quarter, as well as a local centre which would serve the entire urban extension at Sandford and provide the necessary mix of uses required by the allocation of the site. The piecemeal nature of this development proposal for only the eastern part of the Sandford Strategic Site Allocation (SSSA), and the failure to put forward a well-planned, co-ordinated, comprehensive and holistic development for the SSSA, mean that the proposed development does not on its own provide and/or guarantee the necessary vehicular access through to Andover Road to the west. As a result, DPC would stand as an island with a single point of vehicular access being via the central valley crossing from the north east, forming a very large scale cul-de-sac. This is considered inadequate in urban design terms, in respect of permeability and connectivity.

The application includes two proposals for emergency access, one across the central valley and one along the cycle route within the country parkland. Both of these fail to provide satisfactory vehicular emergency access for DPC and its community. This is unacceptable, inappropriate and unsatisfactory in highways terms, for the necessary emergency and service vehicles, as well as for all the residents and users of DPC. The proposals would result in an unacceptable form of development, failing to provide a successfully integrated urban extension.

Access is not a reserved matter and it is considered that the detailed access proposals fail to provide satisfactory access to DPC and in this respect the proposed access details are inadequate and insufficient and therefore unacceptable.

In addition, the critical issue of access to DPC and the applicant's proposed design response have a number of harmful and unnecessary consequences for the development and the site as follows:-

i) in highways terms satisfactory emergency access could only be provided in this case in the form of two separate and independent access road structures across the entire width of the central valley. The applicant's illustrative solution is for a single substantial earthworks embankment bridge structure instead. This would result in unnecessary and unacceptable harm to:- a) the landscape character and visual quality of the valley; b) trees on the valley side; and c) the ecology of the riparian valley, including the priority habitat of rush pasture, with the area of purple moor grass of county importance. Similar concerns are also raised in respect of the potential adverse harmful impact of the proposed construction access across the central valley to DPC and also to PHS. The proposed central valley crossing embankment would also introduce an unacceptable and unnecessary obstacle to the proposed pedestrian and cycle routes running along the two sides of the central valley, which seek to connect the country parkland and the whole of the SSSA to the Rugby Club site to the north; and

ii) the other emergency access in the form of the Grasscrete widening of the proposed cycleway within the country parkland and its consequent diversion in part from running adjacent to the public right of way (PROW9), would introduce an unnecessary additional element of domestication within the country parkland, which results in unnecessary and unacceptable harm to the landscape character

and visual quality of the landscape, as well as to an ancient woodland (Waterleaze Copse) and associated riparian valley crossing, through which it would pass.

The proposal, by disregarding the importance to deliver a comprehensive and co-ordinated holistic development, is ill-thought out, will cause unnecessary substantial material harm to a whole range of interests of acknowledged importance, would fail to deliver a satisfactory form of development and is therefore unacceptable and inappropriate on a number of levels. In this respect it is contrary to Policies ADPP2, CS3, CS5, CS13, CS14, CS17, CS18, CS19 of the West Berkshire Core Strategy Development Plan Document (CS DPD, adopted July 2012); Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Vision, the Strategic Objectives and the Development Principles including S1, L1, L2, L4, L6, L7, E1, E2, A1, A2, A6, F1, F2, U1, U4, U5, CA7 & CA9 of the Sandleford Park SPD (adopted March 2015).

7. The application fails to provide sufficient information to demonstrate that the development proposed would not result in a severe impact requiring mitigation on the A34 Strategic Road Network, despite the IDP identifying the A34/A343 junction as critical infrastructure. The proposal is therefore contrary to Policies ADPP2, CS3, CS5 and CS13 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012).
8. The application site includes a network of six ancient woodlands and one other woodland with a number of ancient indicators. All the trees on the site are the subject of a Tree Preservation Order (TPO 201/21/1016-W15-MIXED). In accordance with NPPF paragraph 175(c) ancient woodlands are irreplaceable habitats. Although the submitted documentation refers to the intended provision of 15m buffers to the ancient woodlands and 10m buffers to the other woodland, the proposals indicate that in certain instances works will encroach into the 15m buffers, as in the case of the sports pitch proposed to the south of Barns Copse, or the proximity of conveyancing channels and detention basins in relation to Dirty Ground Copse, Highwood and Slockett's Copse, or the proposed cycle route and Grasscrete works in relation to Waterleaze Copse. The Planning Authority considers that notwithstanding the 15m buffers metric in Sandleford Park SPD, 15m buffers should be a minimum in accordance with Natural England standing advice and the development should be providing appropriate and more generous buffers as appropriate, to ensure unnecessary deterioration and harm to these irreplaceable habitats. At the same time the existing connectivity of Crooks Copse with Highwood and Slockett's Copse, is seriously at risk from the encroachment of the development proposals into the area of the northern valley, significantly narrowing that corridor beyond what is envisaged by the SP SPD. Furthermore the proposed drainage strategy gives rise to concerns in respect of potential direct surface water drainage from Development Parcel Central (DPC) and Development Parcel North 2 (DPN2) into the adjacent Dirty Ground Copse and Slockett's Copse respectively.

The proposed development fails to provide acceptable indications, and therefore sufficient confidence and certainty, that the proposed development will not cause the avoidable deterioration of and harm to the ancient woodlands on site. The application proposal fails i) to adequately set out and explain any wholly exceptional reasons which apply in this case and justify any such harm; and ii) to

clearly set out the suitable compensation strategy that would be put in place to address this harm.

In this respect the application is unacceptable, inappropriate and contrary to Policies CS3, CS14, CS17, CS18, CS19 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Strategic Objectives and Development Principle L4 of the Sandford Park SPD (adopted March 2015).

9. In addition to the woodlands the site contains many individual trees and also others forming part of hedgerows. All the trees on the site are the subject of a Tree Preservation Order (TPO 201/21/1016-W15-MIXED).

The proposal will result in the loss of an ancient oak (T34) and the potential loss of a veteran oak (T127) to facilitate aspects of the development. In both cases the application has failed to explain why their loss cannot be avoided, as it appears that it could be, and to set out the wholly exceptional reasons and to provide details of the suitable compensation strategy that would justify their loss.

The proposal will also result in works within the root protection area of four other veteran trees and their potential deterioration, the loss of a category A tree within the central valley and the loss of a number of trees and hedgerow in relation to the extension land to PHS. All these works appear to be avoidable and the proposal does not demonstrate alternative approaches to avoid such harm to trees that are the subject of a TPO.

The proposal will also result in the extensive loss of trees and hedgerow along Monks Lane without satisfactory strategic mitigation, to the detriment of the amenity, visual quality and verdant character of this important thoroughfare street scene.

The proposed development will cause harm to a number of irreplaceable priority habitats comprising ancient and veteran trees and a number of other important trees that are the subject of a TPO, without satisfactory justification and compensation / mitigation. The proposal is therefore poor, unacceptable and inappropriate and contrary to Policies CS17 and CS18 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); and the Strategic Objectives and Development Principle L4 of the Sandford Park SPD (adopted March 2015).

10. The proposal seeks to set aside part of the site to form an extension to Park House School in order to mitigate the impact of the development proposed on secondary education provision, as required by Policy CS3 of the Core Strategy. The applicants have proposed that the expansion land to be provided is used to facilitate the identified need for an additional sports pitch. The proposal however will result in the loss of the ancient tree (T34), as well as a number of trees and hedgerow along its western boundary, while also encroaching onto the buffer of the Barns Copse ancient woodland. It is apparent that these impacts could be avoided by a small increase in the area of proposed expansion land to be secured, the size of which remains inadequate, or, through an alternative proposal for the alterations to the school.

The proposal is unacceptable as it stands and as a result the proposal would fail to make adequate provision in relation to secondary education, to mitigate the needs of the development and to also ensure the satisfactory provision of a sports pitch. The proposal is therefore contrary to Policy CS3 and CS5 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Vision, Strategic Objectives and design Principles S1 and F1 of the Sandleford Park SPD (adopted March 2015).

11. It is considered that the proposed development gives insufficient regard to the post-construction adverse impacts on the existing retained habitats. The current proposals are expected to lead to:-
- i) a gradual but significant decline in the quality of the habitats on site, such as:- ancient woodland, rush pasture (including Purple Moor Grass), ponds, riparian/fluvial habitats, secondary woodland / Lowland mixed deciduous woodland, hedgerows, and Woodpasture and Parkland BAP priority habitat; and
  - ii) an unacceptable reduction in the suitability of habitats for a number of protected species, such as:- bats, reptiles, skylarks, lapwings, dormice and badgers; and also notable species such as native amphibians and hedgehogs.
- These are caused by increased anthropogenic pressures on the site which have neither been adequately considered, nor mitigated for with appropriate compensation measures.

Furthermore, the submitted Biodiversity Net Gain Assessment (ES Vol. 3 Appendix F2 1) is considered inadequate as it does not account for the degradation of the retained existing habitats.

In addition there are a large number of inconsistencies within the submitted documentation, and the considerations being made have the potential to also have an adverse impact of the local natural environment, with environmental impacts not adequately addressed / mitigated for.

The proposal is unacceptable on ecological and biodiversity grounds and it is contrary to Policies CS14, CS17 and CS18 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Vision, Strategic Objectives and Design Principle L4 of the Sandleford Park SPD (adopted March 2015).

12. The proposed development could have potential significant effects on European Designated Special Areas of Conservation (SAC), namely Kennet Valley Alderwoods SAC, Kennet and Lambourn Floodplain SAC and the River Lambourn SAC. With regard to the Conservation of Habitats and Species Regulations 2017, the proposal provides insufficient information regarding the likely impacts on air quality of the development proposed. The lack of provision prevents the necessary assessment of the potential significant effects on these SACs and any necessary mitigation required. The proposal does not include the information that is necessary to determine the significance of these impacts and the scope for mitigation.

The lack of sufficient information is contrary to the Conservation of Habitats and Species Regulations 2017, Policies CS17 of the West Berkshire Core Strategy

Development Plan Document (CS DPD, adopted July 2012) and Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017)

13. The proposal does not provide sufficient information in respect of:-
- i) the interrelationship of surface water runoff between the application site and the remainder of the Sandleford Strategic Site Allocation;
  - ii) the impact of the proposed conveyance channels on ground water levels; and
  - iii) the impact of surface water runoff on ancient woodland.

In the absence of that information there is potential for adverse impact on ground water and the woodlands.

Furthermore, the proposed drainage strategy proposes detention basins within the country park (A, B and C) with approximately the same surface area in square metres as volume in cubic metres, resulting in basins approximately 1 metre in depth with near vertical sides. This would be unacceptable as basin side slopes should be constructed ideally with a 1 in 4 gradient in accordance with SuDS Manual C753. The use of conditions to address this concern would not be reasonable given the limited area around the basins and high potential to detrimentally impact on existing streams (which require an 8 metre buffer zone on both sides), proposed footpaths and ancient woodland.

In addition, the Drainage Strategy Plan submitted (ES Vol. 3 Appendix K1, drawing number 10309-DR-02) is incomplete, omitting a significant element of green infrastructure comprising the River Enborne, appears to show surface water flowing almost in line with the contours in several places, rather than angled to them as would be expected. Furthermore, surface water flow appears to be directed through the ancient woodlands of Dirty Ground Copse and Slockett's Copse which is unacceptable due to potential ecological damage that would cause. With regard to the status of those woodlands as irreplaceable habitats, the development proposal has failed to determine through modelling that new surface water flow will not detrimentally affect the ancient woodland.

The lack of sufficient information prevents a full consideration of the impact of the proposed development on ground water levels and ancient woodlands and the necessary mitigation required. Furthermore, the provision of acceptable and adequate detention basins are unlikely to be achievable whilst respecting the existing watercourses, proposed pedestrian infrastructure and ancient woodlands. As such the proposal is unacceptable and contrary to Policies CS3, CS14, CS16, CS17 and CS18 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); the Vision, Strategic Objectives and Development Principle H1 of the Sandleford Park SPD (adopted March 2015); and the West Berkshire Sustainable Drainage Systems SPD (adopted 2018).

14. The development fails to secure satisfactory Section 106 planning obligation/s to deliver the necessary infrastructure, mitigation and enabling works (on and off site), including in terms of: affordable housing, travel plan, highway works including pedestrian and cycle facilities (off-site), country parkland, public open space and play facilities, sports pitch provision, other green infrastructure, public transport, primary and secondary education, healthcare and local centre, including community and commercial uses.

The application is therefore contrary to Policies CS3, CS4, CS5, CS6, CS13, CS17, CS18 of the West Berkshire Core Strategy Development Plan Document (CS DPD, adopted July 2012); the Vision, Strategic Objectives and the Development Principles of the Sandford Park SPD (adopted March 2015); and the West Berkshire Planning Obligations Supplementary Planning Document (PO SPD, adopted December 2014).

**If you require further information on this decision please contact the Council via the Customer Call Centre on 01635 519111.**

#### **INFORMATIVE:**

1 In attempting to determine the application in a way that can foster the delivery of sustainable development, the local planning authority has approached this decision in a positive way having regard to Development Plan policies and available guidance to try to secure high quality appropriate development. In this application whilst there has been a need to balance conflicting considerations, the local planning authority has also been unable to find an acceptable solution to the problems with the development so that the development can be said to improve the economic, social and environmental conditions of the area.

2 This decision to REFUSE the proposed development is based on the following plans and reports:

Location Plan (drawing number 14.273/PP01 RevB);  
Land Use and Access Parameter Plan (drawing number 14.273/PP02 RevH1);  
Green Infrastructure Parameter Plan (drawing number 14.273/PP03 RevG1);  
Building Heights Parameter Plan (drawing number 14.273/PP04 RevG1);  
Parcelisation Plan (drawing number 14.273/PP05 RevB);  
Strategic Landscape and Green Infrastructure Plan (drawing number 04627.00005.16.632.13);  
Country Park Phasing Plan (drawing number 04627.00005.16.306.15);  
Monks Lane Eastern Site Access (drawing number 172985/A/07.1);  
Monks Lane Western Junction Access (drawing number 172985/A/08);  
Illustrative Layout Plan (drawing number 171);  
Access Road Plan (drawing number 14.273/928);  
Combined Land Use and Access Parameter Plan (drawing number 14.273/PP02 RevI);  
Combined Green Infrastructure Parameter Plan (drawing number 14.273/PP03 RevH);  
Combined Building Heights Parameter Plan (drawing number 14.273/PP04 RevH);  
Combined Strategic Landscape and Green Infrastructure Plan (drawing number 04627.00005.16.633.14);  
Planning Statement (May 2020, Issue A);  
Affordable Housing Statement (May 2020, Issue A);  
Transport Assessment (March 2020);  
Environmental Statement (Non- Technical Summary, Vol. 1 - Main Report, Vol. 2 A3 Figures, Vol. 3a & 3b Appendices; March 2020);  
Design and Access Statement (February 2020, Issue 8);  
Energy and Sustainability Statement (December 2019, 2017.013.001b);  
Draft S106 Agreement (6th May 2020, 2112295/AZT/SKA01);  
Response to Reasons for Refusal To Application 16/03309/OUTMAJ (May 2020);  
Draft Planning Conditions (May 2020, Issue A);  
Memorandum of Understanding (6th May 2020);

Statement of Community Engagement (March 2018).

3 This application has been considered by West Berkshire Council, and REFUSED. Should the application be granted on appeal there will be a liability to pay Community Infrastructure Levy to West Berkshire Council on commencement of the development. This charge would be levied in accordance with the West Berkshire Council CIL Charging Schedule and Section 211 of the Planning Act 2008.

Decision Date :- 13th October 2020

A handwritten signature in black ink, appearing to read 'Gary Lugg', with a stylized flourish at the end.

**Gary Lugg**  
**Head of Development and Planning**



## **TOWN AND COUNTRY PLANNING ACT 1990**

### **Notification to be sent to an applicant when a local planning authority refuse planning permission or grant it subject to conditions**

#### **Appeals to the Secretary of State**

- If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.
- If you want to appeal against the local planning authority's decision then you must do so within 6 months of the date of this notice.
- Appeals must be made using a form which you can get from the Planning Inspectorate at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN or online using the Planning Portal at [www.planningportal.co.uk](http://www.planningportal.co.uk).
- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

#### **Purchase Notices**

- If either the local planning authority or the Secretary of State refuses permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.
- In these circumstances, the owner may serve a purchase notice on the Council in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.



**Appendix 4: Valley Crossing Study**



**LRM**  
PLANNING  
LIMITED

**SANDLEFORD PARK**

**VALLEY CROSSING STUDY**

December 2020



## Report Control

Project: Sandleford Park

Client: Bloor Homes and Sandleford Farm Partnership

Job Number: 16.159

File Origin: [https://lmapanninglimited.sharepoint.com/16/16.159 Sandleford Park, Newbury/10 Appeal/201207 Valley Crossing Study.docx](https://lmapanninglimited.sharepoint.com/16/16.159%20Sandleford%20Park,%20Newbury/10%20Appeal/201207%20Valley%20Crossing%20Study.docx)

### Document checking

Primary author: Owen Jones

Initialled: OJ

Review by:

Initialled:

Issue	Date	Status	Checked for issue
A	17/12/2020		OJ



## Contents

<b>1</b>	<b>Introduction .....</b>	<b>3</b>
<b>2</b>	<b>Supplementary Planning Document .....</b>	<b>4</b>
<b>3</b>	<b>Options .....</b>	<b>7</b>
<b>4</b>	<b>Crooks Copse Link .....</b>	<b>10</b>



# 1 Introduction

- 1.1 The Development Proposals at Sandlesford Park require new highway infrastructure to be constructed across the Site's valleys:
  - between Neighbourhood 1 (DPN) and Neighbourhood 2 (DPC) shown on the Framework Masterplan in the Council published Supplementary Document; and
  - within Neighbourhood 1, south of Crooks Copse, to provide east-west movement, as required by the Council's Highway Development Control Manager, and the absence of which had been a reason for refusal previously.
- 1.2 In considering planning application 20/01238/OUTMAJ, certain consultees raise comments about the design, appearance and potential environmental effect of the engineering works required in these locations.
- 1.3 Previously, and acknowledging the need to balance a range of considerations, the Council were satisfied that the design of the valley crossing could be determined at a later stage in the planning process. On this occasion the Council has chosen to include amongst its reasons for refusal their view that the access proposals to DPC (i.e. the valley crossing) fails to provide satisfactory access and is inadequate and therefore unacceptable; Reason for Refusal 6 refers.
- 1.4 The concern is expressed in the following terms:
  - i) in highways terms satisfactory emergency access could only be provided in this case in the form of two separate and independent access road structures across the entire width of the central valley. The applicant's illustrative solution is for a single substantial earthworks embankment bridge structure instead. This would result in unnecessary and unacceptable harm to:- a) the landscape character and visual quality of the valley; b) trees on the valley side; and c) the ecology of the riparian valley, including the priority habitat of rush pasture, with the area of purple moor grass of county importance. Similar concerns are also raised in respect of the potential adverse harmful impact of the proposed construction access across the central valley to DPC and also to PHS. The proposed central valley crossing embankment would also introduce an unacceptable and unnecessary obstacle to the proposed pedestrian and cycle routes running along the two sides of the central valley, which seek to connect the country parkland and the whole of the SSSA to the Rugby Club site to the north the Application Site.
- 1.5 The proposed crossing south of Crooks Copse is also referred to in the Officer's Delegated Report as causing isolation to this woodland leading to reduction in / loss of connectivity and its fragmentation.
- 1.6 This Study has been prepared to illustrate potential alternative options for providing the Valley Crossing and the design of the Crooks Copse Link, to aid all parties.



## 2 Supplementary Planning Document

2.1 In respect of the Central Valley Crossing, the Sandlesford Park Supplementary Planning Document refers to the following:

*"The design of the access road across the wet 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 landform and minimise the damage to tree cover on the valley sides"* (page 36).

2.2 Later, the SPD describes the geometry of the Main Access Route as providing carriageway widths of 4.8 – 6.0m, plus 2 x 1.5m cycleways and 2 x 2m footways (page 63). The overall width of the Main Access Route is therefore between 11.8m and 13m.

2.3 In respect of Character Areas, **CA7. Valley Crossing** on page 79 of the SPD defines the Key Design Principles as follows:

- Mature trees within the valley will be retained to maintain the parkland setting and filter or obscure views of the development.
- The valley crossing will sympathetically respond to landform, avoiding the need for large scale earthworks.
- Views of the development edge from within the valley will be carefully managed to minimize the intrusion of development into key views.
- The highway crossing the valley will pass through the wetland on a high-quality low level bridge, which will minimise visual impact on the hydrological regime of the wetland.
- Dedicated pedestrian and cycle access will also be incorporated onto the bridge.
- Additional parkland tree planting will be included on the valley sides where it does not conflict with ecological objectives for the valley.

2.4 It goes on to state that *"should additional valley crossing be required the above design principles will apply"*.

2.5 **CA9 Valley Corridors** is explained in terms of key design principles (page 81):

- The undeveloped character of the valley corridors will be retained through the sensitive arrangement of the development edge in key views.
- Pedestrian routes into woodland areas will provide links to the wider network of pedestrian linkages within the development and through the valley onto the Country Parkland.
- The management of existing and created species rich grassland will maintain and maximize biodiversity value. Locally sourced seed mix should be used where possible for the creation of grassland.



- Pedestrian and cycle routes will link the individual parts of the development in a safe, convenient and attractive manner.
- Existing mature and veteran trees within the valley corridors will be retained and managed as appropriate.
- Pedestrian routes within the valley will follow the edge of the valley floor avoiding the wetland area to minimise adverse impacts and allow access into the development areas.
- Any changes to landform associated with pedestrian routes will be sensitive in approach and consistent with the character of the landscape.
- Path surfaces will be developed so as not to have any impact on the hydrology of the valley corridor.

2.6 It follows from the above that the landscape and visual features to be protected are as follows:

- the veteran tree;
- other mature trees;
- the openness and rural character of the valley;
- long uninterrupted views down the valley;
- retained wooded valley sides;
- the wet or damp vegetation in the valley floor; and
- pedestrian and bicycle access along the valley.

2.7 Vehicular and emergency access is also a consideration arising from comments by the Council's Highway Development Control Manager.

2.8 It is recognised by the SPD that there will be an inevitable change to the character, but that these changes should be minimized, so in landscape and visual terms options for the road are the crossing should either be:

- at grade, or as near to grade as possible, with very shallow side slopes; or
- at a high level with minimum interference to the side slopes and their vegetation, with the largest possible open area beneath the bridge, and with retained views down the valley.

2.9 These alternative options are shown on the following plans:

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





2.10 Each of these plans are including at *Appendices 1 – 3*. Illustrative sketches of SK14 and SK023 are shown overleaf. The following section summarises the considerations in respect of these Options.











## 3 Options

3.1 The various considerations arising from the Options listed in para 2.9 are set out below:

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



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

\*see summary of value below

### **Arboricultural Value**

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

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

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

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

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

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



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

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

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

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



## 4 Crooks Copse Link

- 4.1 The drawing at *Appendix 4* illustrates how the vehicular link required for east-west movement could be delivered. The scheme achieves the following principles:

### **Access**

- 4.2 The proposals will provide a new at-grade link road with a small culvert over the existing watercourse. The proposed alignment of the carriageway, which follows the contours of the existing valley, has been design in accordance with the proposed design speed of 20mph. The link road will provide a maximum gradient of 6%, which accords with design guidance.
- 4.3 The width of the proposed link road varies between 5m-6m, providing sufficient space on bends to allow two HGVs to pass, plus a 2m pedestrian footway on the northern side. To minimize the size and scale of the link road, a footway has only been provided on the northern side of the carriageway. This footway will provide a direct east-west route for pedestrians. However, new pedestrian crossings will be provided, which will enable pedestrians/cyclists to cross the route safely and link to the network of footpaths to the north and south of the link road.

### **Landscape and Visual**

- 4.4 Inevitably this link required for highway reasons creates at least some severance of the valley to the south, and great care has been given to ensuring that the footpath links and the appearance of continuity are continued, and this severance is limited as far as possible. To ensure that this new road fits into its landscape it has been designed to follow a serpentine form, following the contours, and its width as narrow as possible.
- 4.5 Most of the vegetation will be retained. The north-south pedestrian route will be visually defined by new tree planting, and this will be underplanted with scrub for wildlife benefit and strategic linkages. This new vegetation links Crooks Copse with the valley, ensuring continuity visually and functionally. Trees will be planted on either side of the road for bat crossings, as set out under ecology below.
- 4.6 The new footpath system in this vicinity will be designed to provide the following:
- a macadam footpath on the northern side of the road, to reduce its size and land take;
  - an offline macadam path on the southern side, linking east to west, in a serpentine form;
  - hoggin landscape paths running north-south from Crooks Copse to both valley sides, creating a sensitive and gently circuitous system of recreational paths down the valley; and
  - pedestrian crossing where these cross the road.

- 4.7 Lighting will be sensitively designed with downward facing time controlled LEDs.

### **Ecology**

- 4.8 The requirement for an east-west link does introduce the potential for severing connectivity between Crooks Copse and other woodlands and open space to the south. Pre-development, this corridor comprises grassland with a ditch at the base. The design seeks to minimise this



impact as far as possible. Primarily this is through minimising the width of the link, which includes only a single footpath. The link has been designed to follow existing contours as closely as possible to avoid introducing an elevated barrier and to reduce the construction area and any banking required. The sinuosity of the road design also works to reduce vehicle speeds to minimise risk to wildlife. As detailed above, impacts from lighting will be minimised through the use of downward-facing LED lights (which avoid upward spill) which will be time-controlled.

- 4.9 New vegetation planting is proposed to improve the quality of the north-south corridor which connects Crooks Copse to the valley. This will comprise new native tree and understorey planting to create a wooded belt. Where this strategic planting intersects with the link, high-level tree planting will be used to provide connectivity at canopy level, in particular for bats.

### **Hydrology**

- 4.10 The link passes over an existing unnamed watercourse which flows in a southerly direction to discharge into the River Enborne. As the link is to be constructed at the approximate grade of the existing topography at the point of the watercourse, a piped culvert will be installed. The culvert is sized to sufficiently provide an unencumbered conveyance of storm water at greenfield run off rates. The pipe will also be laid at a longitudinal gradient which allows for self-cleansing, hence no ponding directly beneath the link will occur. It is common and accepted practice to pipe storm water beneath a road link and the design proposed here is considered sound and robust.

### **Trees**

- 4.11 The proposed route of the road does not encroach upon the RPAs or buffer zones of adjacent retained trees or woodlands. There is no detrimental arboricultural impact as a result of this proposal.



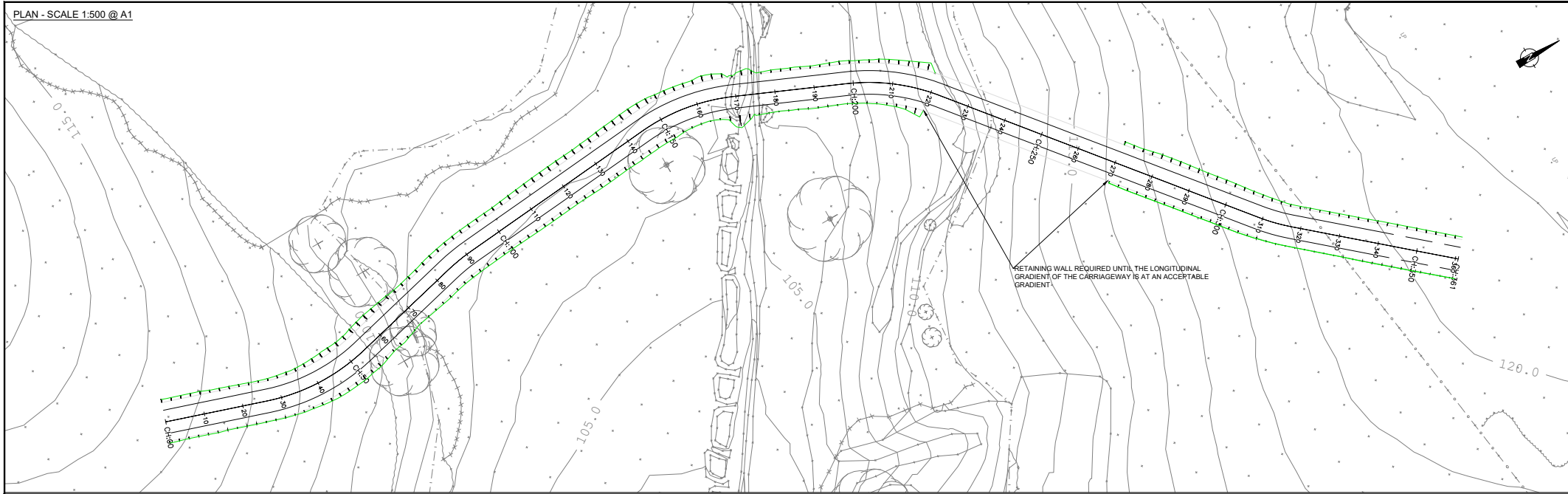


**Appendix 1: VD17562-SK014: proposed alignment & cross/longsections parallel option**

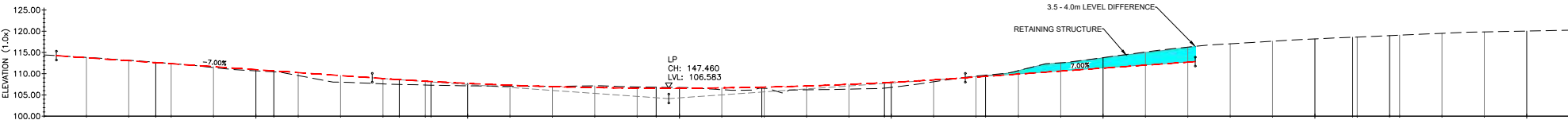




**Appendix 2: VD17562-SK001(rev B): alternative horizontal alignment**



RETAINING WALL REQUIRED UNTIL THE LONGITUDINAL GRADIENT OF THE CARRIAGEWAY IS AT AN ACCEPTABLE GRADIENT



CH: 147.460  
LV: 106.583

CHAINAGE	HORIZONTAL GEOMETRY	VERTICAL GEOMETRY	EXISTING LEVELS	FINISHED LEVELS
10.000	L26.4		113.835	113.755
20.000	R:50.0 L:27.9		113.152	113.095
30.000			112.390	112.355
40.000	L:29.6	G: -1:14.3 (-7.6%) L:74.6	111.441	111.455
50.000			110.682	110.955
60.000			109.557	110.255
70.000			107.995	109.555
80.000	R:50.0 L:17.5		107.589	109.033
90.000	L:53.2		107.336	108.605
100.000			107.147	108.187
110.000			107.060	107.709
120.000			107.017	107.284
130.000			107.137	106.960
140.000	R:50.0 L:24.9	K:10.0 R:1000.0 L:140.0	106.879	106.735
150.000			106.742	106.610
160.000			106.629	106.587
170.000	L:28.9		106.564	107.112
180.000			106.200	107.487
190.000			106.388	107.886
200.000	R:50.0 L:23.9		106.766	107.563
210.000			108.101	108.538
220.000			108.446	109.033
230.000			110.728	109.210
240.000			112.559	110.610
250.000			113.770	111.310
260.000			115.096	112.010
270.000	L:86.7	G:1:14.3 (7.0%) L:34.3	116.266	112.710
280.000			117.046	112.832
290.000			117.645	
300.000			118.187	
310.000	R:50.0 L:8.7		118.620	
320.000			119.067	
330.000			119.503	
340.000	L:43.1		119.838	
350.000			120.038	
360.000			120.237	

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REV	DETAILS	DRAWN	CHECKED	DATE	REV	DETAILS	DRAWN	CHECKED	DATE
A	LONGSECTION ADDED	TW	NS	30.10.20					
B	RETAINING STRUCTURE ADDED	TW	NS	30.11.20					

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PROJECT: SANDLEFORD PARK, NEWBURY

CLIENT: BLOOR HOMES

DRAWING TITLE: ALTERNATIVE HORIZONTAL ALIGNMENT

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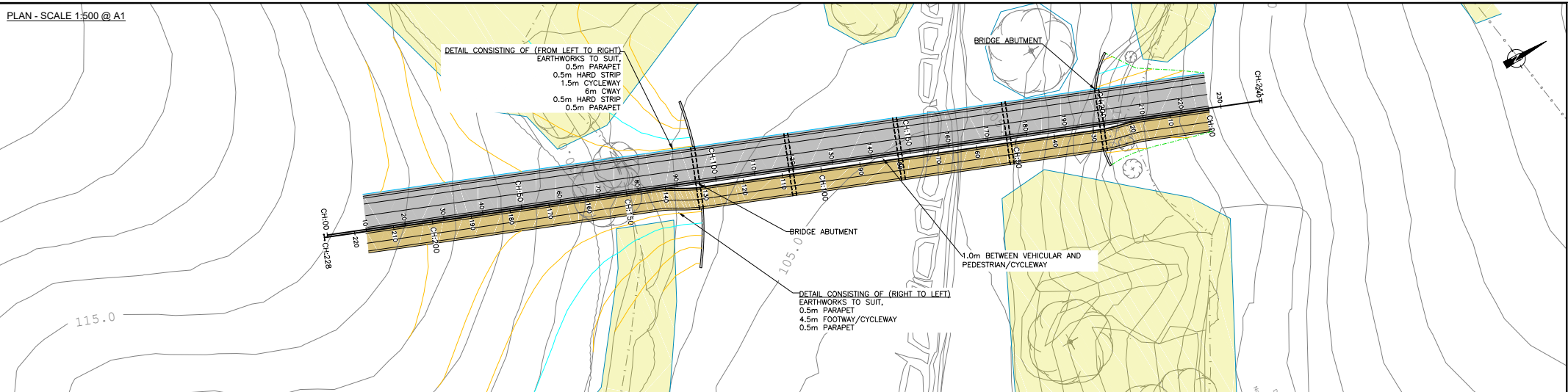
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4th Floor Oxford Place, 61 Oxford Street, Manchester, M1 6EQ  
0161 228 1008  
e: vectos@vectos.co.uk

DRAWING NUMBER: VD17562-SK001 | REVISION: B

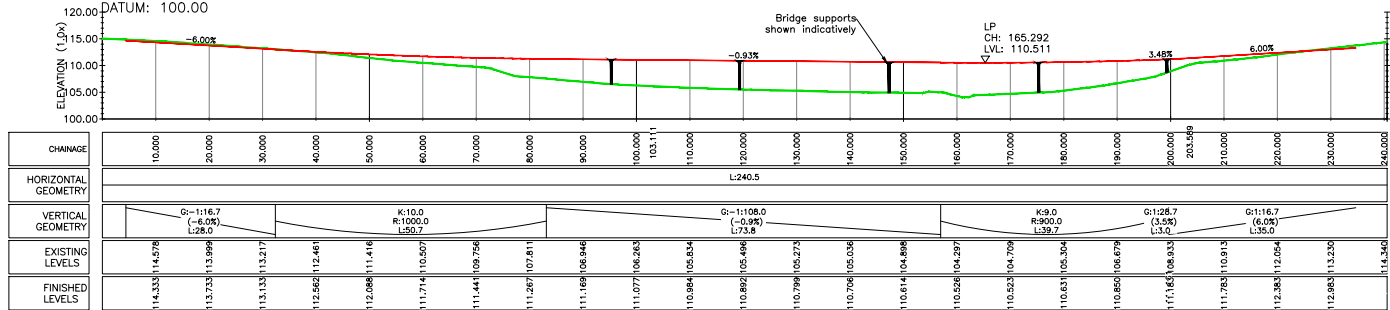


**Appendix 3: VD17562-SK023: proposed vehicular/ pedestrian straight alignment bridge /  
VD17562-STR-SK-003: proposed parallel structures straight alignment option**

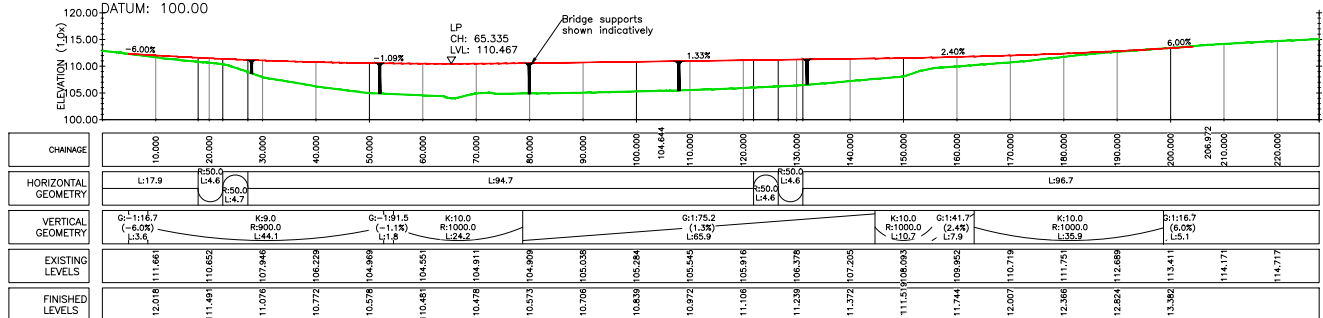


LONGSECTIONS - SCALE 1:500 @ A1

LONG SECTION: Alignment - Left Cway  
SCALE: H:500, V:500  
DATUM: 100.00



LONG SECTION: Alignment - Right Cway  
SCALE: H:500, V:500  
DATUM: 100.00



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1	Changes to Earthworks and alignments	CR	NS	15/12/2020					

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PROJECT: SANDLEFORD PARK, NEWBURY

DRAWING TITLE: PROPOSED VEHICULAR/ PEDESTRIAN STRAIGHT ALIGNMENT BRIDGE

SCALE: Scale 1:500 at A1

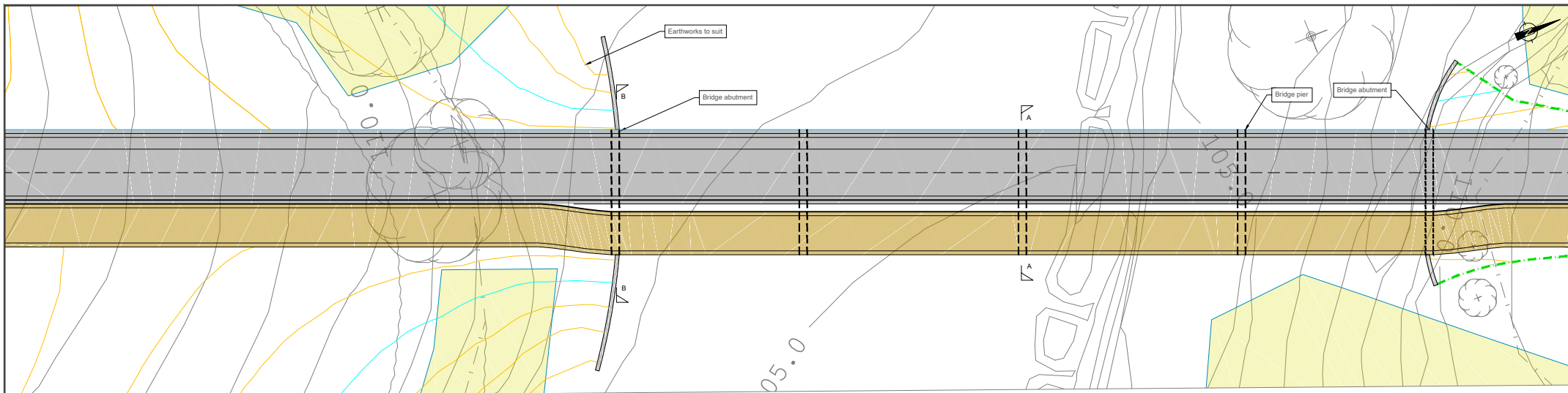
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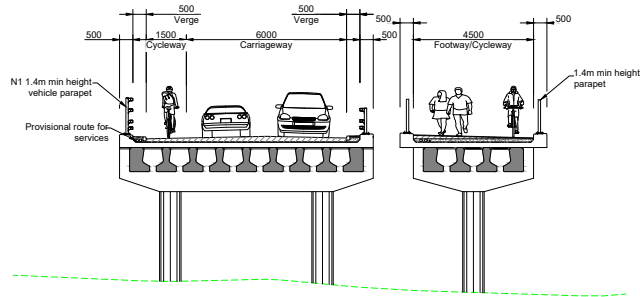
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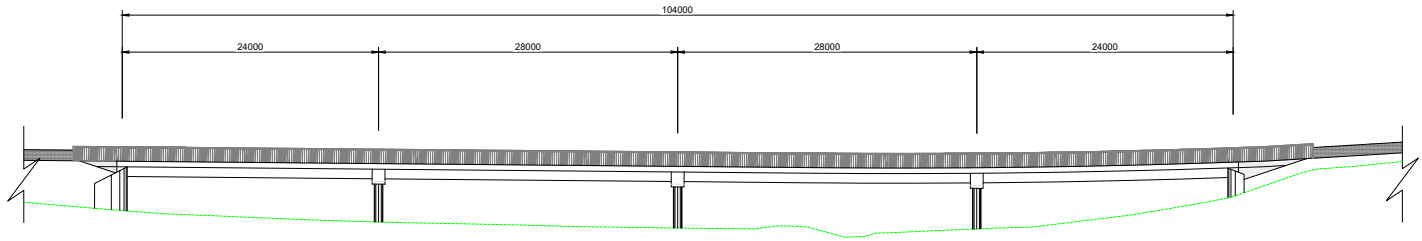
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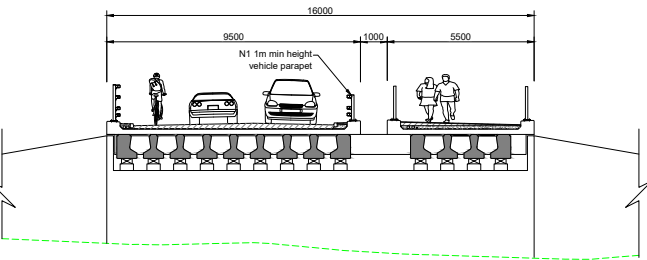
PLAN  
Scale 1:250



SECTION A-A  
scale 1:100



EAST ELEVATION  
scale 1:250



SECTION B-B  
scale 1:100

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REV	DETAILS	DRAWN	CHECKED	DATE	REV	DETAILS	DRAWN	CHECKED	DATE
1	Changes to length and Earthworks	CR	PFM	15/12/2020					

NOTES:

- All dimensions in millimeters unless otherwise stated

KEY:

- Existing ground level
- Extents of Earthworks

PROJECT: SANDLEFORD PARK, NEWBURY

DRAWING TITLE: PROPOSED PARALLEL STRUCTURES STRAIGHT ALIGNMENT OPTION

DRAWN: CR | CHECKED: PFM | DATE: 10/12/2020 | SCALE: AS SHOWN

CLIENT: BLOOR HOMES

**vector.** 

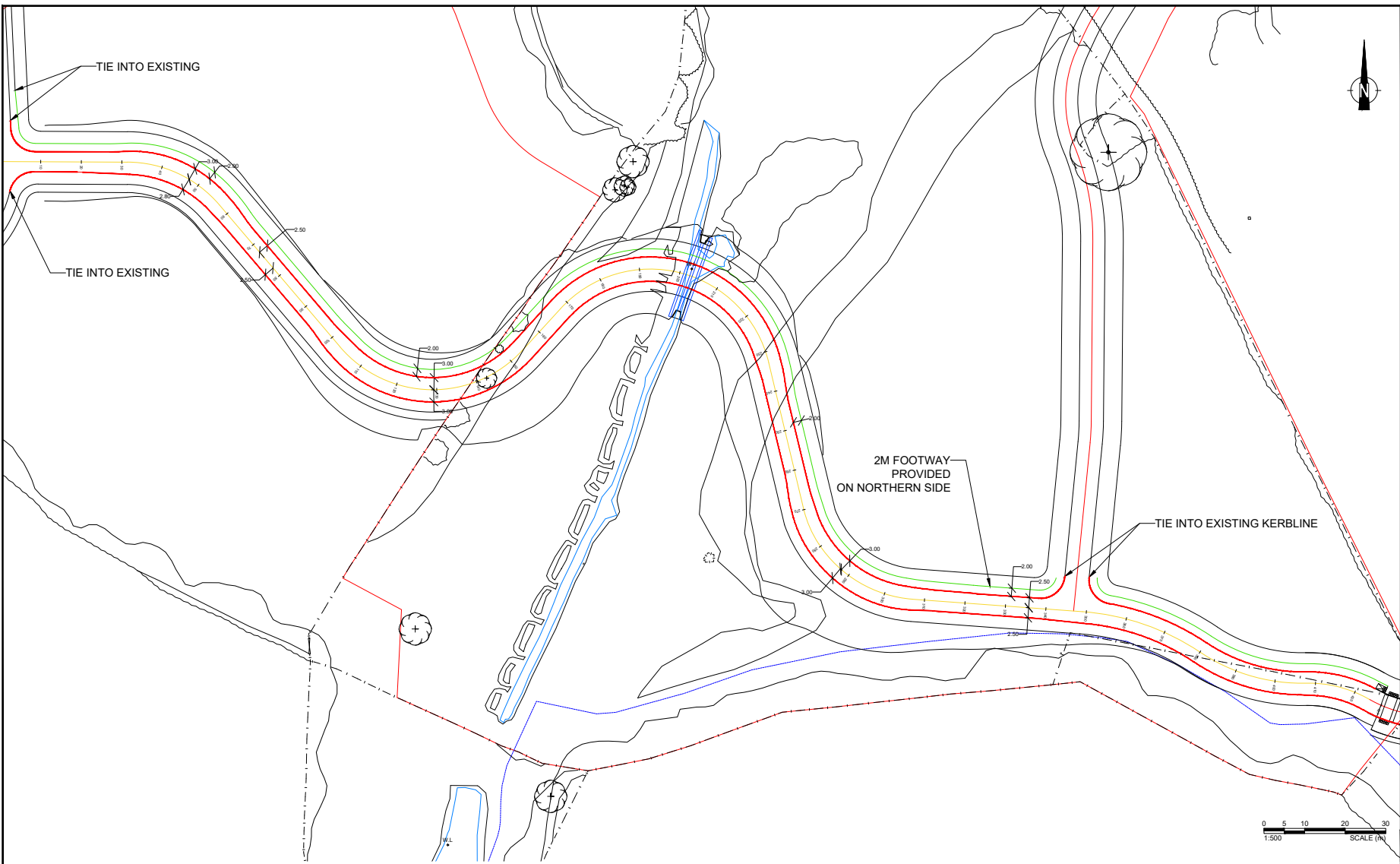
4th Floor Oxford Place, 61 Oxford Street, Manchester, M1 6EQ  
0161 228 1008 e: vectors@vectors.co.uk

DRAWING NUMBER: VD17562-STR-SK-003 | REVISION: 1

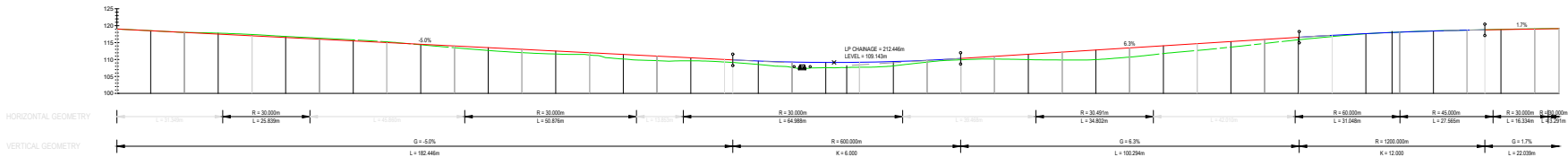
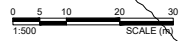


#### **Appendix 4: Crooks Copse Link**





**AWAITING TECHNICAL APPROVAL**  
 This drawing has NOT been technically approved by Local Authority and/or Water Authority. All works subject to change through technical review process with relevant approving authorities.



STATIONING	EXISTING LEVELS	PROPOSED FINISHED LEVEL	LEVEL DIFFERENCE
0+000	118.015	118.015	0.000
5+000	118.017	118.017	-0.002
10+000	118.019	118.019	-0.002
15+000	118.021	118.021	-0.002
20+000	118.023	118.023	-0.002
25+000	118.025	118.025	-0.002
30+000	118.027	118.027	-0.002
35+000	118.029	118.029	-0.002
40+000	118.031	118.031	-0.002
45+000	118.033	118.033	-0.002
50+000	118.035	118.035	-0.002
55+000	118.037	118.037	-0.002
60+000	118.039	118.039	-0.002
65+000	118.041	118.041	-0.002
70+000	118.043	118.043	-0.002
75+000	118.045	118.045	-0.002
80+000	118.047	118.047	-0.002
85+000	118.049	118.049	-0.002
90+000	118.051	118.051	-0.002
95+000	118.053	118.053	-0.002
100+000	118.055	118.055	-0.002
105+000	118.057	118.057	-0.002
110+000	118.059	118.059	-0.002
115+000	118.061	118.061	-0.002
120+000	118.063	118.063	-0.002
125+000	118.065	118.065	-0.002
130+000	118.067	118.067	-0.002
135+000	118.069	118.069	-0.002
140+000	118.071	118.071	-0.002
145+000	118.073	118.073	-0.002
150+000	118.075	118.075	-0.002
155+000	118.077	118.077	-0.002
160+000	118.079	118.079	-0.002
165+000	118.081	118.081	-0.002
170+000	118.083	118.083	-0.002
175+000	118.085	118.085	-0.002
180+000	118.087	118.087	-0.002
185+000	118.089	118.089	-0.002
190+000	118.091	118.091	-0.002
195+000	118.093	118.093	-0.002
200+000	118.095	118.095	-0.002
205+000	118.097	118.097	-0.002
210+000	118.099	118.099	-0.002
215+000	118.101	118.101	-0.002
220+000	118.103	118.103	-0.002
225+000	118.105	118.105	-0.002
230+000	118.107	118.107	-0.002
235+000	118.109	118.109	-0.002
240+000	118.111	118.111	-0.002
245+000	118.113	118.113	-0.002
250+000	118.115	118.115	-0.002
255+000	118.117	118.117	-0.002
260+000	118.119	118.119	-0.002
265+000	118.121	118.121	-0.002
270+000	118.123	118.123	-0.002
275+000	118.125	118.125	-0.002
280+000	118.127	118.127	-0.002
285+000	118.129	118.129	-0.002
290+000	118.131	118.131	-0.002
295+000	118.133	118.133	-0.002
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320+000	118.143	118.143	-0.002
325+000	118.145	118.145	-0.002
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335+000	118.149	118.149	-0.002
340+000	118.151	118.151	-0.002
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350+000	118.155	118.155	-0.002
355+000	118.157	118.157	-0.002
360+000	118.159	118.159	-0.002
365+000	118.161	118.161	-0.002
370+000	118.163	118.163	-0.002
375+000	118.165	118.165	-0.002
380+000	118.167	118.167	-0.002
385+000	118.169	118.169	-0.002
390+000	118.171	118.171	-0.002
395+000	118.173	118.173	-0.002
400+000	118.175	118.175	-0.002
405+000	118.177	118.177	-0.002
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425+000	118.185	118.185	-0.002
430+000	118.187	118.187	-0.002
435+000	118.189	118.189	-0.002
440+000	118.191	118.191	-0.002
445+000	118.193	118.193	-0.002
450+000	118.195	118.195	-0.002
455+000	118.197	118.197	-0.002
460+000	118.199	118.199	-0.002
465+000	118.201	118.201	-0.002
470+000	118.203	118.203	-0.002
475+000	118.205	118.205	-0.002
480+000	118.207	118.207	-0.002
485+000	118.209	118.209	-0.002
490+000	118.211	118.211	-0.002
495+000	118.213	118.213	-0.002
500+000	118.215	118.215	-0.002

SOUTHERN LINK ROAD LONGSECTION  
 SCALE: H 1:500, V 1:500, DATUM: 100.000

B	PUBLIC FOOTPATH REMOVED FROM DRAWING	RT	AM	NS	16.12.20
A	TOPOGRAPHICAL SURVEY ADDED	NS	NS	NS	10.12.20
REV	DETAILS	DRAWN	CHECKED	DATE	

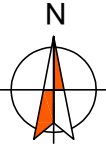
**PRELIMINARY**

CLIENT:	BLOOR HOMES				
PROJECT:	SANDLEFORD PARK, NEWBURY				
DRAWING TITLE:	SOUTHERN LINK ROAD OPTION 2 GENERAL ARRANGEMENT				
SCALE:	1:500 @ A1				
DRAWN:	AM	CHECKED:	NS	DATE:	10.12.2020

**vectors.** CIMA ISO 9001  
 4th Floor Oxford Place, 61 Oxford Street, Manchester, M1 6EQ  
 0161 228 1008 e: vectors@vectors.co.uk  
 DRAWING NUMBER: VD17562-SK021



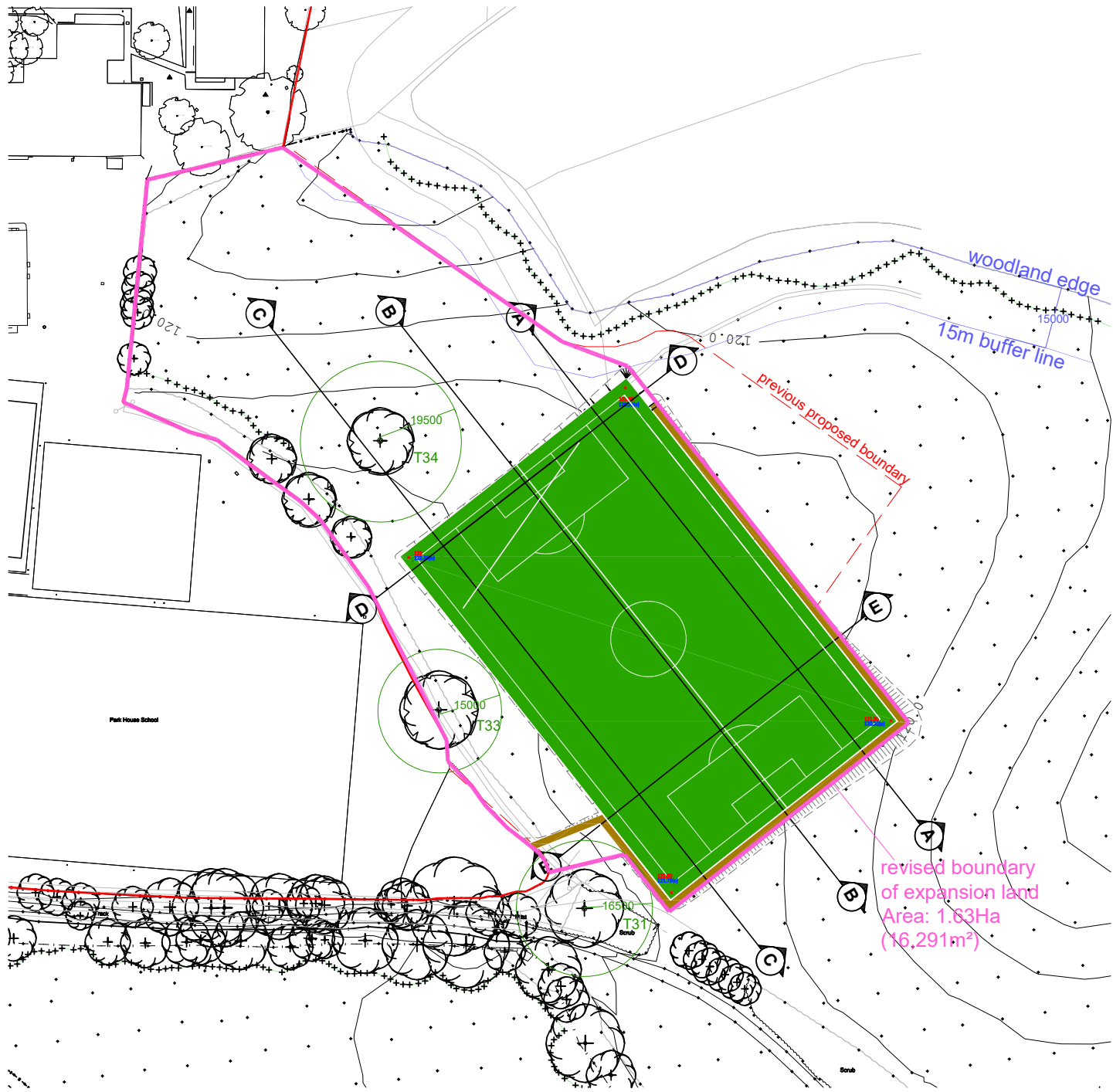
**Appendix 5: Park House School Playing Field Scheme**



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all dimensions to be checked on site and architect notified of any discrepancies prior to commencement.  
do not scale.

notes:



rev: date: comment(s): name: check:

IDP

ARCHITECTS.

URBAN DESIGNERS.

PLANNERS.

PROJECT MANAGERS.

LANDSCAPE ARCHITECTS.

**WE ARE IDP.**

status: **PRELIMINARY** RIBA Stage: **2**

client: **Bloor Homes**

job: **Park House School**

title: **Alternative Pitch Location Sketch**

drawn: **NA** date: **Nov 2020**

checked: **JJH** scale @ a3: **1:1000**

job no: **C3289** drg no: **001-01122020B**

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