

SayNoToSandleford,

28 Feb 2023

Planning Policy,
West Berkshire Council,
Market Street,
Newbury, RG14 5LD

Dear Sirs,

Re: WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039 Proposed Submission January 2023

I write on behalf of the campaign organization SayNoToSandleford (SNTS) in relation to the above document. We have the following comments on the following specific policies.

Policy SP11: Biodiversity and geodiversity

SP 11 appears to be in direct conflict with the NPPF 180 c, especially regarding what defines "exceptional" circumstances. Government guidance infers this to be Nationally important infrastructure (HS2 for example). I do not believe a local housing estate is a nationally important project, and if it were, then ANY ancient woodland would fail to be protected by the NPPF.

"c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons [63] and a suitable compensation strategy exists;

SP11 states.

Proposals which are likely to result in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, ancient hedgerows, traditional unimproved meadows/ancient grasslands and lowland fens) will only be permitted for wholly exceptional reasons where:

15. The need and benefits of the development in that location clearly and unambiguously outweigh the loss;
16. It has been adequately demonstrated that the irreplaceable habitat cannot be retained with the proposed scheme; and
17. Appropriate compensation measures are provided on site wherever possible and off site where this not is feasible. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat and will be considered on a site by site basis, including long term management and maintenance.

The threshold of “wholly exceptional” does not apply to a local housing development.

Policy SP16 (Sandleford Strategic Site Allocation)

SP16: Comment 1

We request that the underlined text below be removed. The junction of Andover Road and Warren Road is unsuitable for all vehicle access, due to presence of schools and churches in the vicinity. Any vehicular access should exclude private cars and larger vehicles apart from buses.

Four primary all vehicle accesses:

Two off Monks Lane;

One through to Andover Road via Warren Road; and

One onto the A339.

SP16: Comment 2

We request that the underlined text below be changed to: “buffers of at least 15 metres”, in order to avoid direct damage to the root system.

Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;

SP16: Comment 3

Further SP16 is in conflict with DM8 (Air Quality) para e.

e) It should not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people;

By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. In particular PM2.5 which is now linked to major health and development issues in young people. With 2 schools and 2 churches in this area already, and additional school planned, this seem both counter intuitive and irresponsible.

Yours Faithfully

Dr. David Cooper
Treasurer,
SayNoToSandleford,