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Landscape and Visual Evidence APP/4

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SANDLEFORD PARK

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CONTENTS

1.0 INTRODUCTION AND WITNESS.....	6
2.0 THE COUNCIL’S STATEMENT OF CASE	11
3.0 BENEFITS OF THE PROPOSALS	13
4.0 THE SPD.....	15
5.0 THE 2019 LANDSCAPE CHARACTER ASSESSMENT	19
6.0 UPDATED LANDSCAPE ASPECTS OF THE LVIA	25
7.0 INTERNAL LANDSCAPE CHARACTER.....	28
8.0 THE VISUAL ASSESSMENT	34
9.0 A VALUED LANDSCAPE?	41
10.0 DETAILED DESIGN	44
11.0 LANDSCAPE POLICY COMMENTS	57
12.0 SUMMARY AND CONCLUSIONS.....	59

APPENDICES APP/5

APPENDIX A: SITE PHOTOGRAPHS UPDATED 2021

APPENDIX B: 2019 LANDSCAPE CHARACTER ASSESSMENT EXTRACTS PP164-169 EXTRACT

APPENDIX C: UPDATED LVIA AND LANDSCAPE TABLES

APPENDIX D: THE SLGI PLANS - PLEASE SEE CD1.21 AND CD1.30

APPENDIX E: LIZ LAKE CONSULTATION RESPONSE

APPENDIX F: LANDSCAPE SENSITIVITY STUDY NEWBURY 2009 CD8.19 EXTRACT

APPENDIX G: ILLUSTRATIVE OPTIONS FOR: L1 Crooks Copse Link, L2 Parkland Carriageway;
L3 Retention Ponds; L4 Monks Lane

1.0 INTRODUCTION AND WITNESS

Witness

- 1.1 My name is Julian Cooper. I am a Director of COOPER Landscape Planning, previously Director of Landscape Architecture at SLR Consulting, and before that the Managing Director of Cooper Partnership, Chartered landscape architects and environmental planning consultants of Bristol. I hold a BSc Degree in Geography, a Post Graduate Diploma in Landscape Design; I am a Fellow of the Landscape Institute, and an Overseas Member of the American Society of Landscape Architects. I have been practicing for over 40 years.
- 1.2 The evidence which I have prepared and provide for this appeal in this Proof of Evidence has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

My Experience

- 1.3 I have been appointed by public and private clients for the design and planning of new settlements, housing, wind turbines, highways, leisure projects, telecommunication towers and employment sites. My practices have advised on the landscape aspects of major national projects such as the M6 Toll Road; the widening of the M2 motorway; and the Channel Tunnel Rail Link on which I have presented evidence to Select Committee of Parliament.
- 1.4 I have advised local authorities on the landscape aspects of their Local Plans and Local Development Frameworks, as well as providing landscape evidence to Regional Strategies, Core Strategy Inquiries, Local Plan Inquiries, Section 78 Appeals and Section 77 call-ins.
- 1.5 I have been invited to provide landscape planning advice for new settlements, including RAF Upper Heyford, and others to the north of Lichfield, Northampton, Exeter, and Winchester, as well as the westerly expansion of Milton Keynes. I am currently appointed by private clients on the expansion of North Luton and Guildford.
- 1.6 I have lectured on landscape design, environmental planning, landscape capacity and sensitivity issues to the Royal Town Planning Institute, Arboricultural Association, Institute of Environmental Management and Assessment, and the Landscape Institute.

My Brief

- 1.7 I was first involved on Sandford Park in 2013, as a Director of SLR Consulting, at which time I expressed my opinion that Sandford Park was suitable for a sensitive and well-mannered development such as now is proposed. I was involved in discussions with Officers of the Council on the layout and I attended technical meetings with officers and attended public exhibitions. I advised on the landscape layout of the master plan of the previous planning application in 2018, but I did not prepare the LVIA, nor did I carry out the assessments .
- 1.8 Extensive, friendly and largely productive technical discussions were held with officers over a long period, including with Ms Bettina Kirkham, the then landscape consultant for the Council. Her suggestions for new viewpoints and montages were all accepted, and, to my knowledge, Ms Kirkham was content with the assessment approach, the master plan and the viewpoints. She was also satisfied with the methodology used, being GLVIA 3 2013. I note that subsequently Ms Kirkham made only minor comments on the 2018 application 18/0764/OUTMAJ.
- 1.9 I was not involved in the current application, neither the master plan, nor the LVIA, as by that time I had left SLR Consulting to set up my new practice, Cooper Landscape Planning. However, having reviewed the application documents, I confirm my support for the current landscape master plans, which I also consider to be both appropriate for the site and well considered. Nevertheless, I will make clear in the evidence if there any further changes to the detailed design that I consider appropriate, for example the central valley crossing, or the parkland carriageway.
- 1.10 I have reviewed and rewritten the landscape tables and the landscape assessment text to cover the missing 2019 landscape character assessment produced by LUC, and I provide additional comments on internal landscape character areas, comparing them with the SPD.
- 1.11 For completeness, I confirm that I provided comments on the Liz Lake September 2020 landscape response to the application.

Reasons for Refusal 3

- 1.12 I was instructed in October 2020 to assess the validity of the reasons for refusal and to provide landscape and visual evidence for this appeal, to deal with the landscape reasons for refusal, namely No 3, which states:

‘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:-

- ***the embankment structure within the central valley;***
- ***the suite and extent of encroaching proposals within the northern valley;***
- ***the NEAP and LEAP locations;***
- ***the engineered nature of Sustainable Drainage Systems (SuDS) features, and their close proximity to ancient woodlands;***
- ***ancient and other woodlands and their buffers;***
- ***ancient, veteran and category A trees;***
- ***the western access point at the boundary with Sandleford Park West (SPW);***
- ***the Monks Lane accesses; and***
- ***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 Sandleford Park SPD (adopted March 2015)'.

- 1.13 It is my professional opinion that this refusal reason is unsound. It ignores the fact that the site is allocated for development, and that this allocation assumes the inevitability of change, as set out in the SPD. Also, it ignores the many benefits of the scheme to which I refer later. In my view, the proposals conform with the landscape and visual advice in the SPD.
- 1.14 I do not agree that the LVIA is 'unacceptable', indeed, had this been the case, I see no reason why the ES would have been accepted at the time of the application. In this regard, Mr Jones sets out a chronology of the planning history in Section 3 of his evidence
- 1.15 I confirm that the latest 2019 landscape character document by LUC was not used by SLR Consulting in the LVIA, which is an error. However, I shall ask the Inspector to consider that there are only small differences between the two landscape character assessments, and that none that are material to the findings of the assessment. I consider that the strategic issues are largely the same, and that the proposals conform to both.
- 1.16 Reason for Refusal 3 refers to unacceptability and harm, however little or no justification or explanation has been provided as to what actual specific harm would occur. The scheme complies with the principles set out in SPD, and in my mind, nothing is being proposed to offend the 2019 landscape character guidance. Also, I note that the emerging Local Plan Review continues to allocate this site and refers to it as being the most suitable location for development at Newbury, as confirmed by the Statement of Common Ground (SoCG) and by Mr Jones.
- 1.17 There are always differences of opinion as to visual impact, as reflected in an LVIA, on which the Inspector will be the judge. However, the proposals appears to have been refused less on specific identified matters of visual harm, more on the lack of the 2019 landscape character guidance and, even then, without identifying what landscape harm is said to occur. Where visual criticisms are levelled by the Council's landscape consultants Liz Lake (hereafter for brevity 'Liz Lake') on behalf of the Council, I deal with them in this evidence.
- 1.18 Criticism is levelled at the lack of assessment of the internal design features set out as bullet points in Reason for Refusal No 3 (page 8 of this evidence), but it is my opinion that the design follows the Council's SPD and, as an outline application, these issues should be subject to detailed design, or as part of reserved matters. Either way, all can be adequately dealt with by further design work. To illustrate this, I provide the design

options set out in Section 10.00, all of which have been agreed by the appellants.

- 1.19 This site is allocated. Thus, the Council must have the view that it is suitable for development, and presumably had the same view again when they adopted the 2019 landscape character guidance and the emerging Local Plan. The Council’s allocation must assume at least some level of harm, as this is inevitable. It is agreed that this harm will occur in the SPD, and in my opinion this level of harm is commensurate with the overall aims of the project.

- 1.20 Matters to do with planning policy will be dealt with by Mr Jones, who will consider the issues related to the two application sites. Arboriculture, trees, and buffer zones will be dealt with by Mr Allder, and ecology by Mr West.

- 1.21 In my comments, I shall refer to the following plans and documents:
 - i. Landscape Master Plans : The Strategic Landscape and Green Infrastructure Plans ES Figure 4.3 (**CD 1.21** and **CD 1.30**); and the Landscape and Green Infrastructure Design and Management Plan LGIMP, **ES Plan G7** ; all subject to be secured by Planning Condition;
 - ii. Management : Ecological Mitigation and Management Plan **ES F18 and F19**); the phase - specific LEMP; all EMMPs being secured by Condition;
 - iii. the detailed Design of the Country Park, and its phasing (**ES Figure 7.1**) which are to be secured by Planning Condition; and
 - iv. the landscape plans (**ES Figures 7.1-7**), particularly the updated photographs (**Appendix A** to this evidence), the ES Sequential Walk through photographs (Sheets 1-4), the internal landscape character areas (**ES Appendix G2**) and the photomontage (**ES Viewpoint 8b**), all provided as part of the planning application or in the case of the photographs updated in this evidence.

2.0 THE COUNCIL’S STATEMENT OF CASE

- 2.1 I have reviewed the Council’s Statement of Case (SoC) as it effects landscape and visual matters, primarily at Page 29 of that document. While it is not appropriate for me to comment on planning or comprehensive development matters (these being considered by Mr Jones), I believe that the Strategic Landscape and Green Infrastructure Plans (**ES Figures 4.3**) and Country Park Phasing Plan (**ES Figure 7.7**) properly cover the whole SDP site area and deals with the landscape and visual issues in a comprehensive and meaningful way.
- 2.2 Paragraph 6.2 of the Council’s SoC considers whether the site is a Valued Landscape, a matter on which I explore at Section 9.00 of my evidence. It is my professional opinion that it is not a Valued Landscape, and that Council have not provided any reasoned explanation of why they consider it to be so.
- 2.3 The SoC points out what the Council see to be flaws in the landscape and visual aspects of the design proposal, and these are listed below, together with my comments on how they can be resolved:
- i. Paragraph 6.3(i) requires the landscape assessment to be updated. This update and the revised tables to go with it are both attached as Appendix C of my evidence; I will point out later that there is little difference between the two landscape character guidance documents in the way that they affect this site, and in the conclusions to be drawn.
 - ii. the crossing of the central valley is considered in Section 10.00 of my evidence in which I set out what I consider to be the key issues that apply to this crossing; my professional view is that either a high level elegant structure or a ground level crossing is to be preferred, with my preference being for a high level structure, as this allows space underneath it, and affects the trees on the valley sides less. But, either way, some crossing is required by the Council, and some harm is inevitable -and the need for this crossing cannot be ignored;
 - iii. my recommendations for the play area in sight of the Priory are also described in Section 10.00, where I consider that they will be assimilated by this landscape, as part of the growth of planting associated with the country park phasing plan;
 - iv. the Council are concerned that the landscape mosaic of the area would not remain after development, but I consider this to be ill judged, in fact I believe this to be a major part of the benefits of the proposals, with the proposed parkland, woodland and the green infrastructure corridors creating something which in my view will be quite special;
 - v. the Monks Lane trees are considered by Mr Alder, but I see no reason why the character of this entrance area can still not be attractive and appropriate to the

area, as I describe later in Section 10.00;

- vi. the Council draw attention to the need for summer and winter assessments in the LVIA, but the assessment tables in the LVIA already provide on completion and construction effects in winter, and 15 years after planting in summer, this being in accordance with guidance;
- vii. the Council point to inconsistencies in documents, a matter that I shall properly leave for Mr Jones;
- viii. the pedestrian and emergency access through the parkland is something that I consider in Section 10.00, where I propose a parkland carriageway running on the line of the historic 18C path running from the Priory to Andover Road to include the emergency, cycleway and footpath access on a serpentine form that is appropriate to the parkland ; and
- ix. lastly, the Council believe, and I agree, that the landscape features and valued components of the landscape should be protected, and I believe the proposals will achieve this aim.

2.4 Taking these points together with the Reason for Refusal 3 I consider that the main issues can be distilled into the following sections of my evidence:

- i. **The benefits** that I see the scheme providing;
- ii. **The SPD:** and how the proposals accord with it;
- iii. **Landscape Character:** how best to illustrate that notwithstanding the new Landscape Character Assessment, how the LVIA satisfactorily addressed the Site's key characteristics, value attributes and sensitivities, the new assessment being much the same as the old;
- iv. **Comments on Visual Impact,** including changes in the view;
- v. **Valued Landscape:** a new comment from the local authority - whether this is really a Valued landscape as described in the NPPF, or an allocated site with sensitive landscape features;
- vi. **Detailed Design:** which is set out in Appendix 4 of the appellant's statement of case namely: the valley crossing, encroachment in to northern valley (the Crooks Copse Link), NEAP/LEAP locations, engineered SUDS features and their proximity to the woodlands, Ancient woodlands and their buffer, Ancient and veteran trees, access to Sandleford Park West, the Monks Lane Access, Emergency access .

3.0 BENEFITS OF THE PROPOSALS

- 3.1 When I carried out my site views as part of the preparation of this evidence I was taken by the character of the woodland and open space mosaic, and the potential opportunities that the open spaces on this site present. I would like the Inspector to share that experience, and I recommend that she carries out a walking site view starting at Warren Road, walking down the historic track, visiting the Priory, taking the parkland view, returning to the site, and walking around High Wood, then down to the entrance to the central valley (the area shown in the photograph below), northwards up the central valley and then walk back through the proposed housing area to Warren Road. I hope she will find the same potential for the character of these retained spaces as I have and understand that it is my wish not only to protect them, but also to allow public access to spaces that the public have no access at present.



Photograph 1: The southern part of the Central Valley, where it joins the proposed parkland area

- 3.2 I have led many design teams on new settlement and urban extensions, but I cannot recall any site that provided such the same level of significant landscape, design, and social opportunities that these new public open spaces would provide. They will form the long term southern setting of Newbury, and an enhancement of the view from the Priory providing a key benefits for the future, including:

- i. the redesign and reuse of 86 ha of fields and woodland to new parkland for the benefit of existing and future residents of Newbury, including public access, extensive new tree planting, and the replacement of dead and stag headed trees;
- ii. an extraordinary 74% of the site to be laid to new parkland, existing and new woodlands, open space, play areas and footpaths, all as recommended by the SPD;
- iii. the creation of a new parkland landscape in view from the former Sandleford Priory, to enhance the currently rather run down view; e extension of a landscape park into the wider part of the parkland;
- iv. the planting of thousands of new trees and shrubs, as a key element of this new parkland;
- v. the retention of as many veteran and mature and other trees as possible, a matter dealt with by Mr Allder;
- vi. a well-considered management scheme to provide for the future of the parkland and woodland, including a warden and a long term management plan;
- vii. new open public access where only a single footpath is available at present;
- viii. new pedestrian access linking the parkland to the existing and new housing areas, and to the college;
- ix. a properly planned strategic landscape for this area, providing a green infrastructure layout for the future;
- x. making controlled use of the mosaic of valleys and woodland including (subject to detailed design) access to the woodlands; and
- xi. overall, to create an exemplar development of which both the Council and the Developers can both be proud.

4.0 THE SPD

- 4.1 I consider that there are significant benefits to this scale of development and, bearing in mind the condition of many of the trees, they come not a moment too soon for the parkland (for example Photograph 11, page 56 of this evidence). Having read the landscape and visual advice in the SPD I believe that the benefits this document seeks will be achieved by the proposed scheme. These benefits include proposals that will be a credit to the town, an enhancement for the parkland, a strong response to the landscape character and the minimisation of visual harm from the new development.
- 4.2 I do not comment either on planning issues, the comprehensive application, or on the nature and process of the management plans and design coding, or on the control mechanisms, as these are the subject of evidence by Mr Jones and Mr Williams , but instead my evidence relates to the design objectives of the SDP proposals for the application site.

Strategic objectives

- 4.3 I have compared the Strategic Landscape and Green Infrastructure Plans (**ES Figure 4.3 CD 1.21** and **CD 1.30**) with the SDP master plans and find them strikingly similar.
- 4.4 Strategic design objectives of the SPD are set out in Table 1 below, together with my comments as to whether they will be achieved by the proposals.

Table 1 SPD Strategic Objectives

Strategic Objective	My agreement with this Objective?	Achieved by the proposals in Design Terms?
<p>Objective 4</p> <p>Development is to respond to landscape character and a new strategy is put in place to minimize visual impact</p>	Agreed	Yes, the proposals reflect the 2019 landscape character guidance, and the visual impact will be minimized both by the layout and the phasing. Detailed design will follow (but see also Section 10.00 of this evidence).
<p>Objective 5</p> <p>Important trees are to be retained</p>	Agreed	Most trees are retained, some lost, including some veteran trees. The scheme has now been

		redesigned to avoid these losses as set out by Mr Allder.
Objective 7 60% of the site to be retained as informal country park and open space	Agreed	Yes, over 74% including the existing woodlands
Objective 12 Landscape character areas are to be provided	Agreed	Yes, please see ES Appendix G2 and Section 7.00 of this evidence.

The WYG LVIA in the SPD

- 4.5 WYG have already produced an LVIA for this site, within the SPD. The findings of this LVIA are relevant to this appeal, as I point out below:
- a. **46 Adverse visual impacts** – WYG consider that these can largely be avoided through the sensitive location of development towards the less visually sensitive north-western parts of the site. **My comment:** this has been achieved by the proposals;
 - b. **47 Landscape Character** – WYG consider that it is inevitable that there will be changes in the landscape character of the site, however development designed to fit the existing landscape framework of the site can maintain its legibility and identity. **My comment:** I agree that change is inevitable, but I consider that the landscape framework maintains the areas legibility and identity, and believe that it will be improved by the proposals;
 - c. **49 Landscape Proposals:** WYG consider that the site requires little further in terms of landscaping due to the existing wooded framework, allowing the focus to be on landscape amenity, biodiversity, and landscape management. **My comment:** extensive additional tree planting has been provided to create an attractive and relevant parkland that reflects the 18C, and the above uses, and appropriate for this location, with the master plan of the parkland to be agreed as part of a condition or reserved matter;
 - d. **51-55 Landscape Character:** WYG set out the key landscape character points that have underpinned the development of the site as proposed in the SPD. **My Comment:** I agree with these landscape character points, as they summarize the key landscape character issues.

- e. **56-63 Visual Issues:** these are listed. **My Comment:** I consider that these have been dealt with in the LVIA, and later in this evidence;
- f. **Figure 4** sets out the main constraints. **My Comment:** I agree with these constraints and they have been used as the basis for the proposals; and
- g. **Figure 8** sets out the resultant SPD framework plan. **My Comment:** this is largely the same as the submitted SLGIP (**CD 1.21 and 1.30**).

4.6 It follows that the landscape proposals in the application conform to the Strategic requirements of the SPD.

Detailed Landscape Design Objectives

4.7 I consider that the proposals also conform to the detailed landscape design objectives, as I show in Table 2 below.

Table 2 SPD Landscape Design Objectives

Detailed Objectives	My Comment	Objective Achieved in Design Terms?
L1 Strategic Landscape and GI Plan	SLGI plan (ES Figure 4.3)	This plan complies with the overall design objectives of the SDP, further description will be provided by detailed design.
L2 Character areas to have their own plans	Each of the landscape character areas has their own detailed information sheets, referred to later in this evidence.	See ES Appendix G2 for the character areas. Further detailed work will come forward at detailed design stage.
L3 Details of Country Park to be provided	Details provided on the SLGI plan	Yes, layout to be worked up at reserved matters stage, and see also Section 10.00 of this evidence.

L4 where possible existing trees to be retained and woodland with 15m set backs	Mr Alder's evidence to the appeal is that only 9% of the buffers are 15m the rest larger.	Yes
L5 Views in to be protected and enhanced	See the LVIA and this evidence	Yes
L6 Green Links and open spaces to be provided	Landscape Master plan and SLGI plan	Yes, see paragraph 8.3 of the SoCG, to be resolved at reserved matters stage, see also the illustrative layout (ES Figure 4.7).
L7 Valley access road to be provided	More detailed options are available. This work is presented in Appendix 4 of the appellants' Statement of Case, and with my suggested options and recommendations set out at Section 10.00 of this evidence.	The Council require this crossing, and it needs to be delivered in the least harmful way.
L8 Setting of heritage assets to be protected	Please see the LVIA Photomontage (see Photomontage 8b) from the Priory and the landscape and heritage report ES Appendix G9.	Yes, there will be a benefit to this view.

4.8 In summary, I consider that in design terms both the strategic and the detailed landscape and visual objectives of the SPD have been followed, and its landscape and visual principles successfully adopted by the proposals.

5.0 THE 2019 LANDSCAPE CHARACTER ASSESSMENT

5.1 The Landscape Character Assessment was not updated by SLR Consulting when the application was submitted by the consultants. This is an obvious error, and unfortunate, but I do not consider it to be significant. The two landscape character assessments are in reality very similar.

5.2 Paragraph 1.29 of the Berkshire Landscape Assessment 2019 explains LUC's position regarding the new 2019 guidance, and how it follows the previous documents:

'This assessment [the LUC 2019 Guidance] builds upon the existing local authority scale assessments from 1993 and 2003 as well as the North Wessex Downs AONB Landscape Character Assessment (2002) (which covers 74% of the District). This West Berkshire Landscape Character Assessment supersedes both the Newbury District Landscape Assessment (1993) and Berkshire Landscape Character Assessment (2003) and sits alongside the North Wessex Downs AONB Landscape Character Assessment (2002), which was produced in order to manage and guide change across a designated area extending beyond West Berkshire. The two studies should be considered complementary to each other'.

[My emphasis]

5.3 To reassure the Inspector that there is little material change between the two assessments. I have updated the landscape character assessment in the LVIA, using the same SLR format, and the landscape tables, these being set out at **Appendix C** to this evidence. In doing this I note that:

- i. the National Character Area remains the same between the two assessments, being NCA 129: Thames Basins Heaths;
- ii. the West Berks Landscape Sensitivity Study (**Appendix F** to this evidence) remains valid to both; and
- iii. the landscape features and the historical features have changed little, apart from the failing stands of trees and the poor quality of the historic track, now the public right of way.

5.4 This reinforces my (and from the comment above, LUC's) view above that the family of landscape character assessments are an evolution, rather than a dramatic change that invalidates the whole LVIA process, as is the Council's stance in Reason for Refusal 3.

5.5 The introductory sections of the 2019 landscape character assessment supports this view:

- i. LUC refer to the new assessment building upon the previous assessment of 1993, not that the earlier assessment was either wrong or misguided in some way;
 - ii. The National Landscape Character 129 is the same in both the 1993 and 2019 assessments;
 - iii. the formative influences of topography, water, geology are all the same;
 - iv. the historic landscape character is also the same; and
 - v. the development pressure and recreational uses of the area will have increased, making it even more important that the proposals for the parkland are achieved.
- 5.6 The 2019 landscape character assessment describes the main landscape character area for this site, being part of **WH2 Greenham Woodland and Heathland Mosaic**, with **LCA AC2 Enborne Valley** lying to the south. LCA WH2 guidance provides only little advice or recommendations on Sandleford Priory these include:
- 5.6.1 Scenic and open views from the plateau: Sandleford Priory provides important open views southwards towards Penwood and Newtown, which I observe both to be largely wooded areas around 5km to the south west and south of Newbury, respectively, not at Sandleford Park.
- 5.6.2 Conserving the setting and integrity of heritage features in the landscape: a sense of time depth and evidence of past land use is important, as is ways to restore the Grade I Priory, and the Grade II Registered Park and Garden, the main part of which lies to the east of the Priory. I point out that only a small part of the Brown landscape crossed the A339 into Sandleford Park, as shown by the historic map of 1873 (**ES Appendix G1**), and that in my opinion the proposals will improve the view from the Priory over the parkland.
- 5.7 The Council have now stated Sandleford Park should now be regarded as a Valued Landscape, but no support for this change can be adduced either from the 2019 landscape character guidance, or in any of the discussions that I have had previously with officers. LCA WH2 is a landscape of flat topped ridges, surface water and streams, deciduous woodlands, and good accessibility. It is not stated anywhere that I could find that the allocated site should be a Valued Landscape; despite the heritage asset of the Priory School and gardens.
- 5.8 A description of the wider WH2 landscape character area is set out in the 2019 guidance. It is said to be valuable for:
- i. scenic views from the plateau (the extent of the plateau is not clear);
 - ii. heritage assets, including those of Sandleford Priory;
 - iii. recreation; and
 - iv. the landscape pattern.

- 5.9 Detractors referred to include ongoing development at Newbury, including that around and adjacent to the site.
- 5.10 To assist the Inspector to understand the differences between them I have compared the landscape character assessments of 2013 and 2019. This is the subject of **Table 3**, below.

Table 3: A Comparison of the two Landscape Character Assessments

Issue	1993 LCA <i>Summary Issues only</i>	2019 LCA <i>Summary Issues only</i>	My Comment
Extent	See LVIA Fig 7.3 LCT H2: Greenham is shaded in yellow on LVIA Fig 7.3	See P164 LCA WH2 LCA WH2 is focussed on Greenham Common, with Sandleford Park as a smaller western outlier	The extent is largely the same, WH2 extends across Greenham Common
Enborne Valley	Abuts LCT A: Upper Valley Floor and mentioned at page 52, 5.25, and on the LVIA at page 7-6	WH2 abuts and refers to the Enborne Valley.	Similar Issues
Key Characteristics	For LCT H Woodland and Heathland Mosaic Topographically varied Intimate lowland rural landscape Mosaic of landcover, woodland and heathland	LCA WH2 Greenham Woodland and Heathland Mosaic Extensive heathland, acid and grassland woodland Scenic and open views from the plateau Heritage and	These are largely the same, albeit in a different order, and with a greater emphasis on views, which are considered by Photomontage 8b

	<p>Strong wooded context</p> <p>Small irregular fields network of hidden streams and ponds</p> <p>Winding rural lanes</p> <p>Wildlife habitats</p> <p>Landscape Parklands</p> <p>Relatively dense pattern of rural settlement</p> <p>For H2 Greenham, and Sandlesford Park</p> <p>Varied landcover mosaic</p> <p>Deciduous woodland including valley woods and wooded ridgelines</p> <p>Varied field patterns</p> <p>Streams and ponds</p> <p>Winding lanes</p> <p>Important heathlands and grasslands</p> <p>Landscape parklands</p> <p>Features of archaeological importance</p>	<p>cultural associations</p> <p>Recreational value</p> <p>Tapestry of agricultural land</p> <p>Detractors include:</p> <p>Development pressure</p> <p>Loss/decline of hedgerows</p> <p>Gradual loss of variation</p> <p>Recreational pressure</p>	
Landscape	Conserve and restore pastureland	Restoration of	These are largely the same but with

Strategy	<p>and encourage management by grazing</p> <p>Promote good woodland management</p> <p>New woodland to follow the existing pattern of wooded ridges and interconnected valleys</p> <p>-Conserve and Strengthen existing boundary elements, including the characteristic wooded boundaries</p> <p>-seek to prevent further loss of hedgerows</p>	<p>heathland</p> <p>Promote woodland management</p> <p>Retain and enhance open views</p> <p>Conserve and strengthen boundaries</p> <p>Balance recreational Pressures</p> <p>Ensure integration of new development into the landscape</p> <p>Conserve the strong time depth experience in the landscape</p>	<p>a greater emphasis on the recreational balance, the preservation of views, and the integration of development, all of which have been considered by the proposals.</p>
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5.11 That the proposals satisfy the Strategic Objectives for both landscape character assessments is explained in **Table 4** below.

Table 4 Landscape Strategy

Strategy in 1993 Landscape Character Assessment	Strategy in 2019 Landscape Character Assessment	Design proposals in Submission	Strategies Achieved by the proposals?
N/A	Retain open views including from Sandford Priory	This has been key, with local viewpoints throughout and the Priory view subject to a wire line photomontage which	Yes

		was agreed with the Council	
Strengthen landscape boundaries and hedgerows	Strengthen landscape boundaries	The retention and enhancement of woodland and hedgerows has been applied throughout, please refer to the Strategic landscape and Green Infrastructure Plan Fig 4.3	Yes
Integration	Integrate the development with the landscape and provide more woodland planting	As Fig 4.3 above	Yes
Protect the Priory and the Brown landscape	Restore the Grade II Park and Garden at the Priory	As Fig 4.3 above	Yes, the view from the Priory will be improved by the new parkland, the main body of the Park and Garden lies to the east of the Priory and will remain unaffected.

5.12 I conclude that the 2013 and the 2019 landscape character guidance are similar, the latter being an evolution of the former. The landscape assessments are a family. The new 2019 guidance serves to reinforce that of the now superseded guidance, which is the normal process of evolution. For that reason, I do not agree with the Council's comments on the landscape aspects of the LVIA in Reasons for Refusal No 3.

6.0 UPDATED LANDSCAPE ASPECTS OF THE LVIA

- 6.1 The submitted LVIA and landscape tables have been revised to include the new landscape character guidance of 2019, now included at **Appendix C** of this evidence.

The Submitted LVIA

- 6.2 The conclusions of the submitted SLR Consulting LVIA were:

‘There will inevitably be changes in the landscape character of the site. However, the new development has been designed to fit in with the existing landscape framework of the site to maintain the legibility and identify of the landscape.

Adverse landscape effects will arise as a result of change in land use within the northern and western parts of the site from greenfield to residential development. Beneficial effects will arise from the laying out and management of the southern part of the site, together with the central and northern valleys and woodland areas, as part of a new country park.

Landscape effects of substantial and moderate significance will comprise:

- *direct and neutral effects of moderate significance on the western part of West Berkshire Landscape Character Type (LCT) H: Woodland and Heathland Mosaic and associated Landscape Character Area (LCA) H2: Greenham, as a result of new development replacing greenfield land within the northern and western parts of the site, balanced by the retention and enhancement of the southern part of the site and central and northern valley areas as a new country park;*
- *direct and substantial beneficial effects on West Berkshire LCT A: Upper Valley Floor and associated LCA A4: Enborne, as a result of the management of ancient woodland within the southern margin of the new country park, where it adjoins the northern edge of the River Enborne;*
- *indirect and moderate to substantial beneficial effects on Basingstoke and Deane LCA 1: Highclere and Burghclere, as a result of enhanced views towards the new country park, where there is intervisibility with the southern part of the site; and*
- *direct and substantial beneficial effects on the south-west margin of Newbury District's LCT 18A: Degraded Parkland, as a result of the proposed country park, and a direct and adverse effect of minor to substantial significance on its north-west margin, as a result of the proposed development.*

In terms of the character of the site, the proposed development will give rise to landscape effects of substantial and moderate significance to:

- *direct and minor to substantial adverse effects on the northern and western parts of the site owing to the loss of greenfield land to development; the significance of the effect varying depending upon the relationship of the proposed development to the existing built edge of Newbury; and*
- *direct and substantial beneficial effects on the southern part of the site, together with the central and northern and retained valley areas, and retained woodland blocks, which will form part of an attractive and managed new country park’.*

2019 LVIA

- 6.3 The detailed assessment of landscape effects, for both time periods, is set out in Part 2 of the Landscape Effects Table, in (Table G6A), also attached to this evidence as **Appendix C**. The findings of the revised landscape assessment, as updated by the 2019 landscape character guidance (also Appendix C), are in principle much the same:
- 6.4 *‘As with any development, there will inevitably be changes in the landscape character. However, being an allocated site, and following the SPD, the new development has been designed to fit in with the existing landscape framework of the site to maintain the legibility, identity, and character of the landscape.*

Adverse landscape effects will arise because of change in land use within the northern and western parts of the site from greenfield to residential development. Beneficial effects will arise from the laying out and management of the southern part of the site as a country parkland, including new public access and extensive new tree planting to accord generally with the 18C plan. The central and northern valleys and woodland areas will be linked to the parkland.

The main landscape adverse effects and benefits are set out under Significance, pages G6-9, Table G6A, as follows:

- *Minor effects to National Character Area NCA 129 Thames Basins Heaths;*
- *Moderate- Substantial On-Completion effects to the proposed housing areas of LCA WH2 Greenham Woodland Heathland Mosaic, these being the changes to the site which are common to any development, and not unexpected on an allocated site;*
- *Subsequently Moderate long term effects to the housing areas of LCA WH2 because of the change of land use from open fields to housing, reducing over time as these areas settle into the landscape and the internal planting grows;*
- *Minor- Moderate On-Completion Benefit for the Country Parkland because of the new open space, new public access, and extensive tree planting;*

- *Moderate – Substantial longer term benefit for the Country Parkland, which covers most of the site, because of the new open space, new public access, improvements in the view from the Priory and extensive tree planting following generally the 18C historic plan, now maturing;*
- *Minor-Moderate on-completion benefit to UV4: Enborne Valley because of new tree planting, and management, and public access within the parkland;*
- *Moderate - Substantial long term benefit to UV4: Enborne Valley because of new tree planting, and woodland management, and public access within the parkland;*
- *Within the site, on-completion, Moderate to Substantial effects of new housing, together with Moderate benefits to new woodlands and parkland; and*
- *Within the site, after 15 years, Moderate effects of new housing, together with Substantial benefits to new woodlands and parkland.*

As with all Outline applications care will need to be exercised in terms of detailed design, including the landscape views and character of the central valley crossing, and on the design of retention ponds, and the historic path. This care is assumed in the assessment.'

- 6.5 I have also considered the landscape assessment of the internal landscape character areas (these are set out on the plans in **ES Appendix G2**, and in Section 7.00 of this evidence).
- 6.6 I conclude that the findings of the two landscape assessments in the 2019 and 2021 LVIAs are similar, and any differences are not material to the significance of the findings.

7.0 INTERNAL LANDSCAPE CHARACTER

- 7.1 Consultants Liz Lake stated that there are no detailed assessment of the landscape features listed (by bullet points) in Reasons for Refusal No 3. I respond as follows:
- i. Firstly, I draw the Inspector's attention to the comprehensive assessment of the existing internal landscape character areas and their capacity for development already provided on the landscape character sheets, **ES Appendix G2**, with the summary plan shown on **ES Figure 7.4**.
 - ii. Secondly, no specific assessment of the proposals have been carried out because of the many unknowns implicit in an outline application, where matters of detail are considered at the reserved matters or detailed design level, an approach that in my experience is neither unusual nor surprising.
 - iii. Thirdly, the schemes and their details follow the SPD prepared by the Council.

LCA 1A Central Valley

- 7.2 The SLR Consulting assessment finds this area as being remote from Newbury, with limited views and the potential to accommodate new recreation routes. I agree.
- 7.3 The SPD requires a road crossing to connect housing on either side and seeks to protect the trees on either side of the valley, and on the valley floor. The SPD does not specify the route but shows a link on plans such as **Figure 4, Figure 7, and Master Plan Figure 13**.
- 7.4 The proposals include a mid-height solution with embankments (**Vectos SK- 014**), and I discuss possible alternatives including the high and low level options in Section 10.00 of this evidence
- 7.5 The assessment sheet identifies this valley as having high value and sensitivity. I agree, but with higher sensitivity levels lying to the south, away from views of the rugby club, school, and the floodlights (Photograph 3, page 49 of this evidence). Any of these solutions will have major landscape and visual effects on this valley, and it is inevitable that change will occur. My conclusion is that a narrow and high level crossing is to be preferred, as this will allow the maximum space underneath and the greatest preservation of openness.

7.6 LCA1B NORTHERN VALLEY

- 7.7 The SLR Consulting assessment finds this valley as being part of a valley complex, a key feature within the site, and remote from development. It is said to be of high value and sensitivity. I agree.

- 7.8 The SPD would retain this valley as a green corridor, as would the proposals. Subject to detailed design, benefits would be provided by means of new recreation routes. The same would apply for the proposals.
- 7.9 The assessment sheet identifies this area as being of high value and sensitivity. The changes in the SPD and the application would be the same, and both would be of moderate benefit.

LCA 2A Crooks Copse

- 7.10 The SLR Consulting assessment finds this area to be ancient woodland with no physical connection with Newbury but visible from the College and Rugby Club. I agree with this and point out that there will be further views of Crooks Copse from Monks Lane and the adjacent houses.
- 7.11 The SPD proposes the area surrounding this viewpoint to be within an area of housing, as do the proposals. The Council’s Highway Officer has previously requested a new road link to the south (valley side) of the Copse. Mr Jones has informed me that the applicants pointed out to the Council that this would be environmentally harmful. In Section 10.00 I propose design options to ameliorate the severance this would cause.
- 7.12 The assessment seeks to provide sensitive management for the copse, and with a 15m or greater buffer of native shrub planting and open space.
- 7.13 The assessment identifies this area as being of high value and sensitivity, on which I agree.
- 7.14 Both SPD and proposals would provide the management necessary, but the SPD does not require the new road, and it follows that the proposals would be more harmful than the SPD, but this is the Council’s requirement, not that of the appellants. Given the need for a new road is common then there would be little difference between the two approaches, but the main severance is caused by the Council’s request for the road.

LCA 2B High Wood

- 7.15 The SLR Consulting assessment finds that this area has no physical connection with Newbury but is visible from the College, Newtown Road, the Priory and the B4640. I agree.
- 7.16 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and, subject to detailed design, designated recreation routes (subject to detailed design), with a minimum 15m buffer of native shrub planting and open space.
- 7.17 The assessment identifies this wood as being of high value and sensitivity, and I agree.

The proposals and the SPD would provide similar benefits, probably of moderate significance. I would like to see some controlled access to this woodland.

LCA 2C Slockett’s Copse

- 7.18 The SLR Consulting assessment finds that this area has no physical connection with Newbury but is visible from the College, Monks Lane, and the Rugby Club. I agree.
- 7.19 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and, subject to detailed design, designated recreation routes, with a minimum 15m buffer of native shrub planting and open space.
- 7.20 The assessment identifies this wood as being of high value and sensitivity, and I agree. The proposals and the SPD would provide similar benefits, most probably of moderate significance. I would like to see some controlled access to this woodland.

LCA 2D Barn Copse

- 7.21 The SLR Consulting assessment finds that this area has a northern boundary with the Rugby Club but is visible from Andover Road and Monks Lane. I agree.
- 7.22 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and, subject to detailed design, designated recreation routes, with a minimum 15m buffer of native shrub planting and open space.
- 7.23 The assessment identifies this wood as being of high value and sensitivity, and I agree. The proposals and the SPD would provide similar benefits, most probably of moderate significance. I would like to see public access limited to that shown on **ES Figure 4.3 (CD 1.21)**

LCA 2E Dirty Ground Copse

- 7.24 The SLR Consulting assessment finds that this area has no physical connection and no visibility. I agree.
- 7.25 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and, subject to detailed design, designated recreation routes, with a minimum 15m buffer of native shrub planting and open space.
- 7.26 The assessment identifies this wood as being of high value and sensitivity, and I agree. The proposals and the SPD would provide similar benefits, most probably of moderate significance.

LCA 2F Gorse Covert

- 7.27 The SLR Consulting assessment finds that this area has no physical connection and is visible from Newton Road, Sandlesford Priory and the B4640.
- 7.28 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and, subject to detailed design, designated recreation routes, with a minimum 15m buffer of native shrub planting and open space.
- 7.29 The assessment identifies this wood as being of high value and sensitivity, and I agree. The proposals and the SPD would provide similar benefits, probably of moderate significance. A public footpath is shown on the landscape plans leading to New Warren Farm. I consider this appropriate, and that appropriate fencing should be put in place to protect wildlife interests.

Brick Kiln Copse

- 7.30 The SLR Consulting assessment finds that the northern part adjoins Warren Lodge and is visible from Andover Road A343. I agree. The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore, and designated recreation routes, with a 15m buffer of native shrub planting.
- 7.31 The assessment identifies this wood as being of high value and sensitivity, and I agree. The benefits of management would probably be of moderate significance, but these would be the subject of detailed design by New Warren Farm.

LCA 2H Waterleaze Copse

- 7.32 The SLR Consulting assessment finds that this off site copse has no physical connection, and is visible from the Newton Road A339 , Sandlesford Priory and the B4640. I agree.
- 7.33 The SPD requires woodland to be managed and enhanced and the assessment proposals are for sensitive management, removal of sycamore and subject to detailed design, designated recreation routes, with a minimum 15m buffer of native shrub planting, with Himalayan Balsam removal adjacent to the two ponds.
- 7.34 The assessment identifies this wood as being of high value and sensitivity, and I agree. The SPD would provide benefits, probably of moderate significance. Considerable areas of new tree planting are shown on the landscape plans, this to replace the trees felled in the past.

LCA 3E Southern Parkland

- 7.35 The SLR Consulting assessment finds that there is no physical connection to the Southern Parkland, and that is visible from the Priory and Newtown Road. I agree.
- 7.36 The SPD requires this are to be accessible parkland and I concur. The assessment recommends reinstatement of the parkland and the landscape features of a pleasure park, with management of vegetation and a reinstatement of the former historic path, being shown on the First Edition OS plan. In Section 10.00 of my evidence, I propose what I consider to be a sensible and practical design option for this route, namely that this could take the form of a parkland carriageway, with a gravelled or hoggin surface, and replanting of historic copses and trees to be taken from the 1st edition plan, together with public access and seating.
- 7.37 Both the SPD and the proposals identify this area as visually highly sensitive to development, and this is true, but it is equally an opportunity for significant visual and landscape character benefit.

LCA 3B Western Parkland

- 7.38 The SLR Consulting assessment finds that the north west margin adjoins Warren Lodge and Park House School, with views in from the east of Andover Road A343. It is visually contained. It is of low to moderate sensitivity. I agree.
- 7.39 The SPD propose this area to be housing, and the proposals concur, with a sensitive incorporation of the footpath route and mitigation planting.
- 7.40 Both the SPD and the proposals see this as being housing, and this would create a similar probably moderate- significant adverse landscape effect.

LCA 3C Warren Lodge Fields

- 7.41 This area connects with properties along the Andover Road, and Warren Lodge. It is visually contained and of low to medium sensitivity.
- 7.42 The SPD propose this area to be housing, and the proposals concur.
- 7.43 Both the SPD and the proposals see this as being housing, and this would create a similar probably moderate - significant adverse landscape and land use effect.

LCA 3D Eastern Parkland

- 7.44 The SLR Consulting assessment finds that there is no physical connection to the Southern Parkland, and that is visible from the Priory and Newtown Road. I agree.
- 7.45 The SPD requires this are to be accessible parkland and the proposals concur. The

assessment recommends reinstatement of the parkland and the landscape features of a pleasure park, with management of vegetation and a reinstatement of the former historic route. In Section 10.00 of this evidence new suggest this could be a parkland carriageway. New planting of historic copses and trees are to be taken from the 1st edition plan, together with public access and seating. Tree planting around the recycling centre would be of benefit to enclose this modern day and perhaps unsympathetic use.

- 7.46 Both the SPD and the proposals identify this area as visually highly sensitive to development, and this will provide the opportunity for significant visual and landscape character benefit.

LCA 3A Northern Parkland

- 7.47 The SLR Consulting assessment finds that this area, adjacent to Crooks Copse, would be overlooked from upper floors of housing along Monks Lane, the College, and the Rugby Club. It is a well-connected area related to built development.
- 7.48 Both the SPD and the proposals see this being in part new housing, and this would create a similar probably moderate- significant adverse landscape effect.
- 7.49 There is a detailed design issue about the retention northern hedge along Monk's Lane, the subject of my evidence in Section 10.00

Conclusion

- 7.50 The comparative assessment of the site's submitted landscape character areas carried out as part of the planning application show a strong similarity between the proposals in the SPD and that of the submitted scheme. The SPD anticipated both adverse and beneficial effects and these are the same or like those exhibited by the proposals. There is little or nothing new in terms of the landscape character because I consider that the scheme conforms largely to the SPD in those terms. The submitted LVIA provides a comprehensive assessment of the internal landscape character areas.

8.0 THE VISUAL ASSESSMENT

- 8.1 I believe that the consultant’s visual assessment is appropriate for an outline application. They deal with the key question for an outline application which is whether and how the proposals fit into the landscape.
- 8.2 Specific areas of design (the ‘bullet point’ design changes of Reason for Refusal No 3) are not assessed because the design is not resolved within an outline application. I have no problem with this approach, especially when they seek to follow the Council’s guidance in the SPD.
- 8.3 Updated photographs taken in March 2021 are provided in my **Appendix A** to this evidence. I confirm that these show no material changes from the 2019 application set, except for the construction of what I believe to a school, currently used as a Covid 19 testing centre (Photographs 7a and b refer). I have not updated the night time photographs, as this is not necessary.
- 8.4 I ask the Inspector to note that the submitted LVIA already provides an extensive number of other photographs to supplement the main photographs in my updated Appendix A. These further photographs appear in the ES (including at Appendix G2, and the sequential views from the public footpath across the parkland) and include: the four sheets of sequential views; photographs of the landscape character areas (as referred to in the preceding section); and a photomontage assessment taken from the Priory and shown in Photomontage 8b.

General Comments

- 8.5 Liz Lake has provides consultation comments (**Appendix E** to this evidence) on behalf of the Council on both landscape and visual matters, and some also appear in Reason for Refusal 3. In my experience it is neither appropriate nor helpful at inquiry to debate individual findings on views and assessments, as it will be for the Inspector to decide. However, it may be helpful to provide comments on the visual issues that have been raised and, where errors have crept in, to provide corrections.

Liz Lake Consultation Comments

- 8.6 *We note all the photographs being used date back to 2017, and it is not clear if the assessment considers any baseline changes that have occurred.*
- 8.7 **My response:** With one exception (the present Covid 19 testing centre) the views have not changed in such a way that will make a significant difference to the assessment findings, but for completeness and for the Inspectors benefit a new set of photograph are appended in **Appendix A** to this evidence.

Liz Lake Consultation Comment

8.8 *The assessment does not appear to distinguish between winter or summer effects (although the old photographs were taken in winter).*

8.9 **My response:** the consultant's LVIA follows GLVIA 3 guidance, namely that the assessment during construction and on completion are taken in Winter, a worst case, and the 15 year assessment is taken in summer, with the benefit of growth of planting and with the proposals in place. This is all set out in the assessment tables. It is normal best practice. Therefore, Liz Lake is incorrect, the LVIA does consider both winter and summer assessments.

Viewpoint 5:

8.10 *Liz Lake: We disagree with the effects on visual amenity assessed from Monk's Lane – the Lane currently provides a strong transition between the urban and rural area due to the contrasting nature of land uses and presence of established vegetation and will be subject to new access arrangements, including new junctions, a large roundabout with new lighting, requiring the removal of mature hedgerow with trees along the frontage. We note the extent of vegetation needing to be removed does not appear to take into account the visibility splay requirements or the quantity of vegetation needing to be removed to accommodate the proposed development and access. The vegetation removals appear to be greater than that shown on the Tree Plans (Barrell). As a consequence, the direct loss of vegetation and the magnitude of change to the road users will result in a significant change to visual amenity apparent along much of the road frontage.*

8.11 **My response:** Matters of tree loss are considered by Mr Alder, but I draw attention to the SPD where at page 52, **Neighbourhood A**, and at page 71, **Character Area CA 4**, the Council draw attention to the inevitability of some tree and hedgerow losses, due to sight lines, and the design approach to take. For example, the illustration at **Picture 23 of the SPD** shows a dense double terrace of houses, which indicates the Council's thoughts for this area.

8.12 Photograph 4 also applies but has received no comment.

8.13 This is an allocated site whereby the Council consider it appropriate to build in this location, as explained in the Local Plan and the SPD. It follows that the rural/countryside transition will inevitably move. That said, the detailed treatment of this edge allows for the opportunity for new tree and hedge planting to replace anything lost as a result of new sight lines. The Council's allocation must necessarily accept the prospect of change, and this is reflected in the SPD (see also paragraph 7.20 of this evidence). I provide options about how this area might be developed in detailed design, and this is set out in Section 10.00 of my evidence.

8.14 No direct assessment is provided by SLR Consulting at the entrance to the site, perhaps

because this access is required by the SPD, and therefore is the Council's policy. I do not know. However, it is obvious that any access onto this road will create a moderate or significant visual effect, one that is anticipated in the SPD.

- 8.15 The blurring of the rural/ urban interface is well considered by the Council's former landscape advisor in her sensitivity assessment for Sandleford Park (**Appendix F** to this evidence) where she concludes on Page 16 that, with my emphasis:

'LLCA 18D: Sandleford Park abuts part of the southern edge of Newbury, the northern part being surrounded on three sides by often intrusive development. Housing in the north looks out over the area, but views are filtered by trees/ woods within the LLCA. Large developments and caravan park/ holiday lodges within the LLCA blur the boundary between rural and urban. Nevertheless, even in this condition the LLCA remains an important open area contributing to the rural setting of Newbury.

- 8.16 Ms Kirkham's words were written on behalf of the Council in 2009 but are true today.

Viewpoint 6

- 8.17 **Liz Lake:** *We consider the magnitude to be greater than stated, and the suggestion that 'new structure planting' will soften views is not agreed with, given the development is tight to the boundary of the college and there is little in the way of strategic planting – the effects will not reduce as suggested without increased structure planting on the boundary.*

- 8.18 **My response:** I see no reason why a detailed layout could not provide more planting along this edge if this were seen to be sensible in urban design terms. That said, I do not believe it appropriate to enclose all housing behind a wall of greenery, instead leaving this as a matter for detailed design. The car park is well trees and Crooks Copse appears in the background, so the structure planting could take the form of carefully located individual trees.

- 8.19 Mr Jones considers that an agreed landscape and ecological master plan could be secured by planning condition, and this could also apply to a strategic landscape and green infrastructure plan.

Viewpoint 8

- 8.20 **Liz Lake:** *We do not consider the effects from Sandleford Priory to be 'Reversible' or 'Negligible' in terms of Magnitude or Significance. The construction and early effects are considered to result in limited (adverse) views of the development and the NEAP particularly in winter, for some time until the proposed planting has established, whilst the foreground will include potentially engineered detention basins, the removal of trees from Waterleaze Copse and the new cycleway and emergency access with further structures across the watercourses – these effects should be acknowledged – and consider potential effects from the wider Registered Park and Garden landscape. It*

would be helpful if early delivery of the planting takes place to accelerate the establishment period in respect of the NEAP and housing on more elevated ground.

- 8.21 **My response:** I understand the point, but these effects are matters for detail design or reserved matters. I draw attention to **Photomontage 8b** taken from the Priors, this being produced in direct response to queries from the Council's former landscape consultant, and that the planting shown on the parkland layout is intended to provide benefit to that view. Certainly, to me the photomontage shows an attractive parkland view which would be a benefit in this location. I believe that this would comply with the SPD.
- 8.22 Some short term effects of construction such as the retention basins and carriageway path may just be perceived, in the short term, but in reality, they would barely be seen. They are not significant in my view. I believe that it is fair to describe them as negligible, and in this I disagree with Liz Lake.
- 8.23 The NEAP would not be visible from this location as it would be hidden by the new advance planting, as shown on the country park phasing plan (**ES Figure 7.7**), this being secured by planning condition. The objective of the phasing is to provide advanced planting at the outset (the diagonal striped hatching shown on the plan), which would grow up to avoid intervisibility with this viewpoint by the time the Parcel Central 3 and the NEAP is constructed. Therefore, Liz Lake is incorrect on this point.
- 8.24 The carriageway and any other paths in the parkland would be barely visible from this location, if at all. I propose in Section 10.00 that the parkland crossing should be carefully detailed as a parkland carriageway. This would run on a serpentine route without lighting or inappropriate signage. This sort of sensitive design can easily be achieved if the highways advisors to the Council are also sensitive to the issues. It would reflect the 1873 track shown on First Edition OS Plan, without slavish copying of the layout of that time.
- 8.25 On my site views I could barely see any retention basin locations from this viewpoint, and my further comments about the option for a gently organically shaped basins are set out in Section 10.00.
- 8.26 I wholeheartedly agree with Liz Lake that the tree and other planting should take place at an early stage, and this is proposed on the parkland phasing plan. While in theory it could be reversed, this is unlikely, as it is not desirable. It is not a significant point, and probably not worth debating.

Viewpoints 14-17

- 8.27 **Liz Lake:** *We do not consider the assessment takes into account the view north towards the new crossing point between the main Development Parcels (seen from 16 and 17), and since there would also be glimpses of the proposed housing and the NEAP, between Dirty Ground Copse and Gorse Covert prior to the establishment of planting, which*

would be an adverse effect (not negligible or beneficial). These views also do not consider the change in foreground views of the 'offline' emergency access or the severance of Waterleaze Copse resulting in the loss of trees, or the potential engineering associated with the SUDs basins and the various crossing points (including vehicular) in this part of the valley.

- 8.28 **My response:** The design intention would be to advance plant the development edge, as shown on the Country Park Phasing Plan **ES Fig 7.7 (CD1.22)**. The new planting would change the view of in a relatively short time, with the housing and NEAP phased to follow later. That was the purpose of this advanced planting that I previously agreed with Officers. The benefit referred to is the enhancement of the parkland which would be visible all around Viewpoints 16 and 17. Of course any improvements to the path would create a short term effect, but this is inevitable.
- 8.29 There seems to be a general criticism regarding the 'potential' effects of drainage structures on the parkland, but I see no reason why this cannot be sensitively handled as part of detailed design. For example, the drainage basins could be in the form of gently contoured depressions, ponds, or lakes, in keeping with the parkland character. This is not an outlandish or unusual approach and I am slightly surprised that the Council's advisors have not made such a suggestion themselves. The Council have anticipated the need for such a drainage design at pp 43-44 of the SPD, including an illustration of a pond. I have discussed this with Mr Witts, and neither of us see why this could not work well, and he provides revised locations for ponds that follow my suggestions (I refer to this in Section 10.00, and as a design option sketch in **Appendix G** to this evidence).

Viewpoint 8

- 8.30 **Liz Lake:** *Looking north, we consider the effect to be greater than stated and the established view after 15 years would be less than a moderate benefit (moderate to substantial significance) in visual terms. Looking south the park land will become more domestic in nature, the detention basin may result in a more engineered appearance, together with metalised surfaces formalised for walking and cycling.*
- 8.31 **My response:** I am pleased to see that the consultants agree a benefit, even if we disagree with the quantum, but I see no reason at all why the parkland should be domestic, as the design follows the guidance of the SPD. No evidence has been provided to support such a statement. I need not have any further comments on the supposed domestic nature or the engineered appearance of the parkland.

8.32 Viewpoints 19-25

- 8.33 **Liz Lake:** *In view 20 the view (is conveniently hidden behind the hedge, take a few steps forward) will have views of the NEAP, which we disagree with the judgement of 'slight benefit'. It introduces a wholly uncharacteristic element into the rural parkland, currently an undeveloped area. Viewpoints 21-25 we concur would have a Major*

Adverse Effect; however, we are concerned that the assessment considers the effect would reduce to Moderate in 15 years; we consider there is no mitigation that would reduce the harm caused by the total enclosure of a currently open rural path, being subsumed by housing on both sides. Its amenity and character will be totally altered by enclosure with housing, remaining a Major Adverse Effect.

- 8.34 **My response:** I need not comment on the ‘conveniently hidden’ view, as the viewpoints have been agreed in the SoCG. In fact, this location lies beyond the NEAP, but in any event, I see no reason whatsoever why a NEAP could not be designed, within the extensive forward tree planting shown on the **SLGI plan Figure 4.3**. I believe this area would be attractive and welcome to the walker, as part of a rural scene, and to describe it as ‘wholly uncharacteristic’ is simply not justified. Here I must be of a different opinion to Liz Lake.
- 8.35 Of course, there would be a change to the path, within an allocated urban area, but there is no reason why this could not be attractive, partly open, and even partly rural. It would be different, certainly, but it would be incorrect and naïve to assume that this change is automatically harmful. Once again, it must be remembered that the SPD assumes that this path will run through the new housing, and across the site and therefore these effects have already been acknowledged. Therefore, I find it disheartening for the Council to seek to identify so much harm to the same proposal in the current application. In my view a moderately harmful effect of a new path set in a designed green corridor with an allocated urban area is if anything an over assessment.
- 8.36 The residual visual assessment in the LVIA states that there would be a mixture of adverse and beneficial visual effects, and this is to be expected in a major development proposal. The SPD recognises the inevitability of some harm, as does the LVIA by WYG in the SPD (and **CD 8.20**), but the overwhelmingly adverse comments by the Council’s consultants concentrate unnecessarily on the harm, but ignore the many benefits created by the new parkland, and the landscape balance.
- 8.37 I would like to re-state here the description of the long term visual effects set out in the original SLR Consulting LVIA:
- i. **moderate to substantial adverse** effects will remain on *Viewpoint 7a* on the Health Walk to south of Newbury College, although the view of the new housing further north- west will be filtered by maturing boundary planting;
 - ii. **moderate to substantial beneficial** effects on *Viewpoint 8a* within the western part of Sandleford Priory (St. Gabriel's School), as new planting within the country park will have matured, and together with the wider managed grassland areas, will reinstate the former character of the historic parkland to the west of the listed school; also, there will be a similar beneficial change in the first floor view from St. Gabriel's School (*Viewpoint 8b*);

- iii. **moderate to substantial beneficial** effects on *Viewpoint 11*, at the eastern end of the public footpath by the A339, adjacent to the driveway entrance into St. Gabriel's School, also because of the enhanced character of the southern part of the site because of the new country park; and
- iv. **minor to moderate beneficial** effects on intermittent views from further south, namely on *Viewpoint 9* on the public footpath off the B4640 at Newtown Common, from where parts of the new country park will be visible.

8.38 By way of summary:

- i. the comments put forward by the Council on the LVIA are unnecessarily and inappropriately critical;
- ii. few if any of these effects are significant, and many are beneficial rather than adverse. This is the direct opposite to Liz Lake's overall comments at Page 15 on her consultation comments where it is said that '*...the LVIA already acknowledges that proposal results in significant harm to the landscape and visual resources of the site*'. In fact, reference to the assessment tables in the LVIA show the opposite: in its conclusions the LVIA explains that there is a *mix of adverse and beneficial effects* because of the proposals, which is hardly surprising for a development of this size, and that the residual long term effects many of which are beneficial. I believe it is reasonable for me to point out again that this is an allocated site where the proposals follow the SPD, therefore the harm and benefits have already been assumed by the Council;
- iii. I could find no comments on or explanation of the undoubted benefits of creating a major new parkland, an improvement in the view from the Priory, or the extensive new public access;
- iv. it is my practice to carry out a cross check to any assessment and the yardstick I use here is to ask: *how many new housing schemes of this size have such as large area of attractive new parkland, and retained and enhanced woodland associated with their design?* It is surely unquestionable that this is a huge benefit of the site, and one that would add to the local site character, Newbury, public access, and the views from the Priory, and I find it difficult to understand the range of criticisms that has been put forward by the consultants; and
- v. I accept that there will be differences in opinion about the short term effects, but it is always appropriate to keep in mind the long term benefits of such a major scheme, and to be realistic about the positive changes that will occur, as well as the harm.

9.0 A VALUED LANDSCAPE?

- 9.1 The Council, in Reason for Refusal 3, state that Sandleford Park is a Valued Landscape, but without substantiating this claim. I find this surprising, especially as this matter has been the subject of agreement at Paragraph 5.6 of the SoCG. It seems illogical to me to have a strategic development site and then claim the development site to be a Valued Landscape.
- 9.2 Paragraph 170a of the NPPF explains that for a landscape to have the special status of a valued landscape the development plan needs to identify its quality as such a landscape, which in this case it does not do.
- 9.3 Neither is the development area, or the parkland identified for its quality in the landscape character guidance.
- 9.4 There is no clear published guidance as to how to assess if a landscape is valued in the way that is meant in Paragraph 170a of the NPPF. Locally designated landscapes such as special landscape areas or areas of great landscape value are likely to be considered valued for the purposes of the NPPF, but non-designated areas can also be valued for those purposes.
- 9.5 It is generally accepted that for a landscape to be valued would require the site to show some demonstrable physical attribute, rather than just popularity. There needs to be something special or out of the ordinary that can be defined. This special or out of the ordinary effect is not something that will be found in the 2019 landscape character guidance.
- 9.6 Landscape character assessments can also provide useful evidence to help identify whether a site is valued in the context of Paragraph 170a of the NPPF, especially if they contain evaluative information. In this regard Box 5.1 of GLVIA 3 (LI/ IEMA 2013) is often used to help identify the demonstrable attributes that might take a landscape out of the ordinary to something that is special and valued in the context of the NPPF. This table is set out in Table 5 below.

Table 5 Valued Landscape Assessment Factors

Factors	Sandleford Park	Comment
Landscape Condition	The landscape condition of the site is poor to medium, it is stated to be medium in the Council's Landscape	The site is seen by the Council as being suitable for development

	Sensitivity Assessment 2009	
Scenic Quality	I consider the scenic quality of the site is medium or medium-high, being an attractive part of LCA WH2, but with the great potential for improvement	The Council have accepted in the SPD that there are no issues regarding visual impact.
Rarity	It is not rare	It is not rare
Representativeness	It is not especially or uniquely representative of the landscape character type	This site is not unique, it is part of a wider landscape character area.
Conservation or other interests	It has interest in the historic parkland views, but the parkland is in a poor condition	I understand that the conservation interests are not high. The parkland views are attractive, but the proposal would improve them.
Recreation Value	The site has a public footpath running across it, and this is well used	The site has limited public access at present, and the proposals would provide a major improvement in terms of open access. The path would be retained
Perceptual Aspects	It is perceived as an allocated site for development, but within that it has with intrinsic higher quality features	The SPD acknowledges this as a development site, and so do I, and it is the preservation of these quality features that make it important
Associations	The Brown parkland and the view from the Priory	The parkland is partly degraded, and the proposal would improve the view. Most of the Brown parkland lies to the east of the road, not within the site. There may be the possibility of an association with the book Watership Down.

- 9.7 By way of summary, in my opinion it is reasonable to conclude that this allocated site does not pass the test of being a Valued Landscape in the meaning of Paragraph 170a. It is attractive and has great potential, but that is not the same thing.

10.0 DETAILED DESIGN

- 10.1 An outline application normally assumes that detailed design will be dealt with by reserved matters or planning conditions. However, the Council have expressed concerns on detailed design elements of the scheme including the central valley crossing, the parkland footpath crossing, and Crooks Copse.
- 10.2 In this section I now consider some alternative design options that I believe could offer detailed design solutions for the next stage of work. In effect, this is the start of the detailed design process that would normally follow an outline planning permission for the design elements in Reason for Refusal No3.
- 10.3 The design aspects which I shall consider are taken from the bullet point list set out in the Reason for Refusal No 3 (please refer to page 7-9 of this evidence).

The Valley Crossing

- 10.4 There is a recognition in the SPD that the link road is required for the scheme, and such a crossing is shown in many of the SPD figures, for example in **SPD Figures 4, 7 and 13**.
- 10.5 The SPD set out the landscape requirements for the valley crossing: paragraph 47 recognizes that there will be *inevitable changes to the landscape* because of any development, and I agree, but that development should also fit in to the landscape framework to minimize the effect on the legibility and identity of the landscape character. I agree that harmful changes should be minimized.
- 10.6 Figure 4 identifies the valley as 'Valley and Wetland'. Development Principle L4 requires all important trees to be retained, where this is possible. I agree.
- 10.7 Development Principle L7 states includes the need to preserve views up and down the valley and to avoid damage to the trees, and on this I also agree:

*'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 the landform and minimise damage to the tree cover on the valley sides**'.*

[My emphasis]

- 10.8 Development Principle CA7, Valley Crossing, goes on to explain that:
- i. **mature trees within the valley will be retained** to maintain the parkland setting and filter or obscure views of development;
 - ii. the valley crossing will sympathetically **respond to landform, avoiding the need for large scale earthworks**;

- iii. views of the development edge from within the valley will be carefully managed to **minimise the intrusion of development into key views**;
- iv. the highway crossing the valley will pass through the wetland on a **high-quality low-level bridge**, which will minimise visual impact and impact on the hydrological regime of the wetland;
- v. dedicated **pedestrian and cycle access** will also be incorporated onto the bridge; and
- vi. additional **parkland tree planting** will be included on the valley sides where it does not conflict with ecological objectives for the valley.

[My emphasis]



Photograph 2: A screen grab from the SPD, showing the Central Valley crossing point

10.9 Development Principle CA9, Valley Corridors, is explained in terms of key design principles:

- i. the undeveloped character of the valley corridors will be retained through the sensitive arrangement of the development edge in key views;
- ii. 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;
- iii. 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;
- iv. pedestrian and cycle routes will link the individual parts of the development in a safe, convenient, and attractive manner;
- v. existing mature and veteran trees within the valley corridors will be retained and managed as appropriate;
- vi. 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;

- vii. any changes to landform associated with pedestrian routes will be sensitive in approach and consistent with the character of the landscape; and
 - viii. path surfaces will be developed so as not to have any impact on the hydrology of the valley corridor.
- 10.10 It follows from the above that the key landscape and visual features to be protected by any crossing of this valley should be:
- i. the veteran and other mature trees;
 - ii. trees in the valley or on the valley sides, wherever this is possible;
 - iii. the openness and rural character of the valley;
 - iv. long uninterrupted views down the valley;
 - v. retained wooded valley sides;
 - vi. the wet or damp vegetation in the valley floor; and
 - vii. pedestrian and bicycle access along the valley, and on either side.
- 10.11 In my professional experience the most desirable and appropriate solution in landscape and visual terms are that it should be either:
- i. **at grade**, or very nearly at grade as possible, as suggested in the SPD, with shallow side slopes, minimum earthworks and retaining walls, and minimising where possible any effects on the trees of the valley side; or
 - ii. **at high level**, with minimum interference to the side slopes and their vegetation, with the largest possible open area beneath the bridge, to ensure retained views down the valley;
- 10.12 Mr Jones has set out the planning background of this design matter in Appendix 4 of the Appellant's Statement of Case, and in the text, as part of a Wheatcroft Consultation. He explains that the planning application provided a solution to the crossing (shown on **Plan SK 014**), which achieved many of these aims. However, I note from this plan that the levels are such that the road could not be brought down to the valley floor. As a result, the essential embankments were more substantial than envisaged in the SPD, and the openness of the valley is thus compromised, as shown in the Wheatcroft illustrations. The result is that the Council in their Reason for Refusal 3 comment that this solution would influence the openness of the valley and prevent views up the valley. I agree. It is my view that this scheme was a valid attempt to achieve the SPD aims, but I agree it did not work as well as it might.
- 10.13 Illustrations of the high level and low level schemes are provided in the Appellants' **Statement of Case, Appendix 4**, including a tabular discussion of the pros and cons of the three schemes, including Illustrations of the high level and low level schemes are provided in that document.
- 10.14 The options for a valley crossing has now been addressed further by the appellant's design team, and I have discussed this with Mr Bird, and Mr West, and I understand

that a layout has been agreed with the highway authority. This is based on a high level scheme, a wide opening under the bridge, and a lighting scheme can be incorporated into the bridge abutments. This latter point would have the benefit of lighting the carriageway and with no upward glow, avoiding harm to the ecological value, as described by Mr West.

- 10.15 All schemes can be made to work, but in my professional opinion that the high level solution (SK 003), as revised by Mr Bird, is to be preferred in landscape and visual terms. The landscape and visual benefits for a high level solution are as follows:
- i. a horizontal road which springs from the highest part of the valley sides, with the maximum of space underneath;
 - ii. a road that is as visually thin as possible;
 - iii. the width of valley should be maximized by using vertical abutments;
 - iv. the columns should be as thin as possible with as wide as spacing as possible;
 - v. either no lighting, or careful limits on the lighting scheme to avoid light spillage or spread into the valley;
 - vi. retention of as much as possible of the valley side vegetation; and
 - vii. retention of the mature trees in the valley.
- 10.16 I gather that the Council's response to the Wheatcroft consultation appear at least partially inclined to agree with the high level proposal, but they have expressed concerns about the double bridge, preferring instead a single structure. This may be possible, but the bridge would be wider I am not convinced that this would provide the benefit they seek.
- 10.17 It is my view that any crossing of the valley, including that low level solution proposed by the Council in the SPD, would be visually significant. It is also my view that the high level crossing would minimise the harm created and that if a crossing is required then the SDP location is best suited, this because of the existing views of buildings and floodlights at the end of the valley, as shown by the photograph below.



Photograph 3: the presence of large buildings and flood lights at the upper end of the Central Valley

Crooks Copse

- 10.18 For highways reasons the Council have previously requested that a new road be provided to the south of Crooks Copse, which I understand would be to distribute development traffic around the site. I note that WYG did not include this link in the SPD LVIA. Therefore, the appellants are seeking to respond to the Council's updated requirements. Inevitably any road in this location will create some severance to the valley but with care I believe that the footpath links and the appearance of continuity can be maintained, and that this severance can be limited as far as possible.
- 10.19 To ensure that this new road fits into its landscape it follows a serpentine form, along the contours, and its width is kept as narrow as possible. The serpentine solution to the Crooks Copse link is set out in the **Appellant's Statement of Case at Appendix 4, Plan SK 041**. If everyone agreed, in part it could be surfaced in block paving, to advertise a landscape and pedestrian friendly design.
- 10.20 Most of the vegetation should be retained and new trees planted to link the two copses, both visually and ecologically. The valley path would therefore be defined by new tree planting, underplanted with scrub for wildlife benefit as shown on the sketch suggestion in my **Appendix G** to this evidence. Such new vegetation would link Crooks Copse with the valley, ensuring continuity both visually and functionally, with trees planted on either side of the road for bat crossings. Of course, I acknowledge that the

SGLI plan does not show the amount of tree planting that I show on my sketch, but the SLGI is an indicative strategic high level plan I see no reason why this could not be achieved within an updated and agreed country park landscape master plan, which would follow.

- 10.21 The landscape and visual features to be protected to the south of Crooks Copse are:
- i. the green infrastructure link between Crooks Copse and the valley between Slockett's Copse and High Wood is key;
 - ii. a natural green space and link from houses to the north to the parkland to the south;
 - iii. apart from the road, a green space crossed by footpaths and cycleways.
- 10.22 My Appendix G sketch provides: a narrow road width by locating the pedestrian path on one side of the road, not on both; pedestrian links to the paths down the valley, landscape on either side; a minimum of slopes and cutting or filling because of the serpentine line; and an appearance of the green infrastructure corridor flowing across the road.
- 10.23 In my view, the layout provided on **Plan SK 041** and in my sketch at **Appendix G** satisfies these landscape objectives, however further design development could properly take place at the detailed design stage.

The Parkland Footpath

- 10.24 An existing footpath crosses the parkland as shown on the ES Figure 4.3 (**CD 1.21**). its line follows that of the track shown on the First Edition OS plan, which leads directly to the Priory (**ES Appendix G1** Historic Plan 1873).
- 10.25 The present footpath and PRoW is currently a series of untidy earth tracks and wheel ruts, with an overall width of between 3-4.5m, as shown by the following photographs:



Photographs 4 and 5: the rutted paths of the public right of way and historic track

- 10.26 I think that we can do much better than this. While I do not favour the grasscrete and parallel path solution, my proposed option would be for a parkland carriageway that would encompass path, cycleway, and emergency access, as shown typically on the sketch in my **Appendix G**, and in the examples below. The landscape and visual features of this path and its setting would include recognition of the 18C parkland character, without claiming it be part of the historic designed park (see **ES Appendix G, historic map of 1873**); a path designed as a hoggin or rolled gravel carriageway, as befits a country parkland, laid to serpentine curves and carefully tree planted to everyone’s satisfaction as part of the landscape setting of both the Priory and of Sandlesford Park.
- 10.27 Such a path that will *not* be a wide tarmac surfaced lit, and painted cycleway, rather it should be as narrow as possible, the width of a carriage, sensitively designed to fit into the informal setting of the parkland. Please see the photographs below, taken from Kingston Lacey.



Photograph 6: Carriageway and ornamental bridge at Kington Lacey

10.28 I have discussed the detail of this path with Mr Bird, and we consider that a footpath/cycleway carriageway could be as narrow as 3m, with overflow edging of 700mm provided by an underground (and unseen) reinforced geotextile, in the unlikely event that an emergency vehicle would need to use the carriageway for access. I consider the use of geotextiles rather than grasscrete to be appropriate for a county parkland.



Photograph 7: Parkland Carriageway at Kington Lacey, in front of mature cedar

NEAP/LEAP location

- 10.29 The NEAP is located at the end of the vista eastwards from the Priory. However, any glimpses from the listed building would be nearly 1km distant, with the play area enclosed by new tree and shrub planting, as shown on the **SLGIP (ES Figure 4.3)**. Furthermore, the planting surrounding the NEAP is stated on **ES Plan 7.7** to be '*Early/advanced planting delivered on commencement with the start of construction works on site*', with the parkland and the development related to this NEAP being in Development Parcel 3. The result of this is that by the time the NEAP is constructed, the trees and woodland surrounding it will by that time be providing its visual enclosure. Please refer to **Photomontage 8b, ES Appendix G4**, taken from Priory School.

Engineered SUDS features, and their proximity to the retained woodlands

- 10.30 These necessary SUDS features should not and need not be the hard engineering solutions that the Council fear them to be. While it was the applicant's intention to deal with their drainage layout as part of detailed design, as an option I have now produced a revised layout sketch of a typical pond in my Appendix G. This shows how such a pond could work, it provides a soft, organic, and sensitive solution with shallow slopes and rolled edges, a solution that is appropriate for a parkland. Some ponds would be wet or partially wet, as shown on the sketch, and usable by both residents and visitors.
- 10.31 An existing location showing a similar depression as I suggest for the ponds is to be found to the south of High Wood (please refer to the photograph below). In my opinion such a location and design cannot sensibly be regarded as the potentially harmful engineered pond that the Council suggest.



Photograph 8: the depression at the southern end of High Wood

- 10.32** I have discussed and agreed the changes to the ponds with Mr Witts, and together we have come up with an improved and revised solution to the pond system generally, one that will not only minimize any harm to the parkland, but instead provide a benefit (an option for the revised pond layouts is shown on Mr Witts drainage plan in his evidence, Appendix B, Plan 10309- DR03A). Between us we recommend a solution that works well in both drainage and landscape terms. This new layout is provided in his evidence.
- 10.33** Taking the southernmost pond as an example the typical location is shown by the photograph overleaf. It is obvious to me that a pond could be designed to fit into this landscape in a sensitive and beneficial way, far removed from the potential engineering solution suggested by the Council. With careful design they could be very pleasant multi - functional landscape spaces that would provide sitting areas and wildlife benefit as well as the necessary drainage solutions.



Photograph 9: the potential location for a retention area to the south of High Wood

Ancient Woodlands, Trees, and their buffers

- 10.34** Matters to do with trees are dealt with by my colleague Mr Allder. From a visual point of view, I agree that a minimum of 15m around each woodland is appropriate, but I would always recommend flexibility and variation. I have discussed this with Mr West, and he informs me that only 9% of the woodland edges would be subject to a 15m buffer, the remainder being considerably more, and I suggest that they should be designed most appropriately as part of the open space layouts (please refer to Plan 103 - DR - 03A, in Mr Allder's evidence), rather than by rote.
- 10.35** I also agree that we need to retain all mature or veteran trees, including T34, G36/G37, T46 and T48 and examples of how this can be done are set out in in the evidence of Mr Allder.

The Monks Lane Access

- 10.36 The Monks Lane access is discussed in the SoCG, at 1.11. I note that the presence of houses in this area is explained as part of **Neighbourhood A**, page 52, and considered for **CA4** at page 71 of the SPD, the **Monks Lane Character Area**. New accesses are to be provided, and that there is general acceptance that these will require sight lines.
- 10.37 I do not consider it good practice to seek to hide houses behind a wall of greenery, and it is preferable that the scheme should be well considered and appropriate for the area, an urban design matter suitable for subsequent discussion.
- 10.38 There are trees on Monks Lane, and a hedgerow, but the photograph of the eastern part of the existing entrance below shows that the same visual effect could be achieved by new planting within, say, five years.



Photograph 10: The young hedgerow and trees just to the west of the farm gate on Monks Lane

- 10.39 My view on Monks Lane is that the new scheme, when it designed in detail, should include the following landscape elements, a typical option that I illustrate on the sketch in my **Appendix G**:

- i. well-designed focal point buildings at the entrance;
- ii. tree and shrub planting on the roundabout;
- iii. retention of as much of the hedge as sightline and highways will permit;
- iv. planting of a new hedge and trees on the eastern side of the access, as above, with keynote buildings on the western side;
- v. upright growing trees at regular intervals running into the site, as shown on the illustrative Boyer master plan (ES 4.7), these being at approximately 10m centres; and
- vi. group planting of trees within the housing areas.

10.40 The existing view into the site from Monks Lane is shown in the photograph below. I will leave the issue of the loss and replacement of trees to Mr Alder, but I point out simply that there are many more trees planted as part of this proposal that there are to be lost, and that the existing access is not one of high visual quality.



Photograph 11: the view into the site through the farm gate on Monks Lane

10.41 In summary, Reason for Refusal No 3 sets out concerns on such detailed design elements as the central valley crossing, the parkland crossing and Crooks Copse. I have reviewed each of those elements under my jurisdiction and I have considered other design solutions that could be explored at detailed design, in effect the start of the detailed design process. In my opinion all the issues raised are capable of resolution.

11.0 LANDSCAPE POLICY COMMENTS

- 11.1 Policy matters are rightly the remit of Mr Jones, to whom I defer and refer to his evidence.
- 11.2 Reason for Refusal No 3 explains the Council's view that the proposals are contrary to Policy **CS14**, **CS19** of the adopted Local Plan, and **GS1** of the Housing Site Allocations DPD 2017. I would like to provide some comment on the landscape and visual aspects of each policy, in the light of my foregoing evidence.
- 11.3 **Policy CS 14** considers **Design Principles** and explains that new development must demonstrate high quality sustainable design that respects the character and appearance of the area, including not only visual design, but also how the area functions, its distinctiveness and sense of place.
- 11.4 It is my view that the proposals comply with such a policy, rather than being contrary to them. Great care has been taken to provide a quality layout and this follows directly from the requirements of the Council's SPD, as I show in Section 4.00 of my evidence. The landscape and other master plans follow the principles set out in that SPD and would represent a benefit to this extraordinary site.
- 11.5 **Policy CS19** considers the **Historic Environment and Landscape Character**. It explains that the natural, cultural, and functional components of character will be considered as a whole, including the sensitivity to change, the settlement character, historic assets, and local character.
- 11.6 It is my view that the proposals comply with the 2019 landscape character guidance. While the landscape character information was not current, in my view this did not make a material difference to the overall finding on landscape character. The principles of the 2013 and 2019 guidance are very similar, the latter being an evolution of the former, as explained by LUC. The new guidance has little to say about Sandford Park, and the issues it refers to such as Sandford Priory will experience benefit because of the proposals. The view from the Priory will be enhanced.
- 11.7 The Council have dismissed the LVIA as inadequate, but I do not find this to be the case because the visual assessment is robust, and the landscape character between the two assessments is largely the same. An LVIA is intended to be a guide to decision making, and it performs this function. The proposals comply with the 2019 landscape character guidance, and I consider that the Council's comments on visual assessment are mostly unfounded and overstated.
- 11.8 The appellants have continued (and continue) to seek to resolve the differences of opinion on the layout in a positive and open way and evidence has provided what I see to be sensible options for the specific design concerns that have been expressed. It is my view that all these differences can be resolved if there is a will to do so.

- 11.9 **Policy GS1** is a general site policy that seeks development to accord with the West Berkshire Development Plan and adopted SPD, including comprehensive development, walking and cycle routes, retention of landscape features of value, production of an LVIA to inform the capacity, design and layout, a green infrastructure and open space structure, a proper response to the surrounding character and the mitigation of ecological impacts. I consider that the proposals comply.
- 11.10 By way of summary, I consider that in landscape and visual terms the above requirements have been complied with, and that the scheme conforms to the requirements of the SPD. There are some remaining design matters and inconsistencies that have not yet met a final resolution, but solutions and options have been found, and are contained in my and other witnesses' evidence, all being capable of resolution by a planning condition or at reserved matters.

12.0 SUMMARY AND CONCLUSIONS

12.1 It is my view that:

- i. the proposals work well on the ground;
- ii. the strategic and the detailed landscape and visual objectives of the SPD have been followed in design terms, and its landscape and visual principles successfully adopted.
- iii. there is no evidence for a valued landscape designation, even more so that this is an allocated site;
- iv. the visual assessment shows that there will be little long term visual harm but many long term visual benefits;
- v. the views from Sandleford Priory would be an improvement on the existing;
- vi. the proposals conform to the 2019 landscape character guidance;
- vii. matters of detailed design can be dealt with in reserved matters or planning condition, as acknowledged in the SoCG; and
- viii. I have proposed options for detailed areas that show how this could be achieved.

12.2 The wide range and type of benefits of this scheme have been either underestimated or ignored by the Council. These include:

- i. the redesign and reuse of 86 ha of fields and woodland to new parkland for the benefit of future residents of Newbury, including public access and tree planting;
- ii. 74% of the site will be laid to new parkland, existing and new woodlands, and open space, play areas and footpaths, as recommended by the SPD;
- iii. the creation of a parkland landscape in view from the former Sandleford Priory;
- iv. the planting of many new trees and shrubs as part of this substantial new parkland, as part of a detailed design for the parkland to be agreed, based on that in the SLGI plans;
- v. the retention of as many veteran and mature and other trees as possible, on which new proposals are provided in the Appellant's Statement of Case;
- vi. a well-considered management scheme to provide for the future of the parkland and woodland;
- vii. new open public access to the whole of the parkland open space;
- viii. new pedestrian access linking the parkland to the existing and new housing areas, and to the college; and
- ix. a properly planned strategic landscape for this area, providing a structure for the future.

12.3 The proposals would accord with both the 2013 and the 2019 landscape character guidance. The landscape assessments, the capacity, and sensitivity studies need to be

read as a family. The new 2019 guidance serves to reinforce that of the now superseded guidance, which is the normal process of evolution. Above all, the strategic principles of both assessments have been satisfied and any differences between them are not significant. The findings of the two landscape assessment in the 2019 and 2021 LVIA's are similar and not material to the significance of the findings.

- 12.4 Few of the visual effects are significant, and many are beneficial rather than adverse. This is the direct opposite to Liz Lake's overall comments at Page 15 on her consultation comments where it is said that '*...the LVIA already acknowledges that proposal results in significant harm to the landscape and visual resources of the site*'. Reference to the assessment tables in the LVIA show the opposite: in its conclusions the LVIA explains that there is a *mix of adverse and beneficial effects* because of the proposals, which is hardly surprising for a development of this size, and that the residual effects are mostly beneficial.
- 12.5 This is an allocated site where the proposals follow the SPD, therefore the harm and benefits will have been assumed by the Council in any event, and the SPD assumes that adverse effects are inevitable.
- 12.6 This allocated site does not pass the test of being a Valued Landscape in the meaning of Paragraph 170a of the NPPF.
- 12.7 Reserved matter designs have been progressed and my options are set out in the evidence. These show that design solutions are available, and they can be properly dealt with by Reserved Matters, or at detailed design.
- 12.8 In Section 2 of this evidence, I set out what I saw to be the main landscape and visual issues to be addressed. These are repeated below, together with my conclusion.
- 12.9 **The Benefits:** I have shown that these are numerous and are either underestimated or ignored by the Council in Reasons for Refusal 3.
- 12.10 **The SPD:** it is my view that the scheme accords with the landscape and visual design aspects of the SPD (I will leave others to deal with the mechanisms).
- 12.11 **Landscape Character:** notwithstanding the new Landscape Character Assessment, I consider that the application satisfactorily addressed the site's key characteristics, value attributes and sensitivities, and that the new character guidance is an evolution of the old.
- 12.12 **Comments on Visual Impact:** these are subjective, but I consider that the visual assessment as submitted was appropriate, and that the Council comments are mostly overstated.
- 12.13 **Valued Landscape:** in my opinion the local authority have not made any case for this to be a Valued Landscape.
- 12.14 **Detailed Design:** matters set out in the Statement of Case, and at Appendix 4 of that document, include: the valley crossing, encroachment in to northern valley (the Crooks Copse Link), NEAP/LEAP locations, engineered SUDS features and their proximity to the woodlands, Ancient woodlands and their buffer, Ancient and veteran trees, access

to Sandleford Park West, the Monks Lane Access, Emergency access. Most are addressed by evidence or are subject to detailed design at a later stage.

- 12.15 For these reasons I respectfully suggest that there is no landscape and visual reason why planning permission should be refused for these well considered proposals.

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