

Town and Country Planning Act 1990 Appeal under Section 78

APP/W0340/W/20/3265460

Sandleford Park, Newbury

Bloor Homes and Sandleford Farm Partnership

Rebuttal Evidence prepared by Owen Jones BA Hons Dip TP MSc MRTPI (APP/31)

April 2021



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1 Rebuttal Evidence

- 1.1 Following receipt of the LPA's evidence on the 7th April 2021 I have considered its written evidence and have prepared this Rebuttal to address certain of the points made by Mr Nikolaos Grigoropoulos and Ms Lynn Robinson.
- 1.2 Mr Grigoropoulos provides Planning evidence on behalf of the LPA and draws upon the evidence on his colleagues in some instances. My comments relate to Section 7 of Mr Grigoropoulos evidence where he discusses the issue of Comprehensive Development at Paragraphs 7.47 7.97.
- 1.3 Ms Robinson provides evidence in respect of affordable housing. My comments relate only to the quantum of affordable housing referred to at Paragraph 3.2 and the suggestion at Paragraph 3.20 that the Council wish to agree the plot location of each individual affordable homes.



2 Comprehensive Development

2.1 In Section 7 of Mr Grigoropoulos' evidence he discusses Comprehensive Development and asserts that:

"the Appeal proposal does not in any way provide a binding commitment nor any certainty and reassurance that it will facilitate, ensure and deliver the required comprehensive and cohesive development of the whole Sandleford Strategic Site Allocation."

2.2 Moreover, it is alleged that:

"the Appeal proposal does not seek to guarantee to date, that an acceptable and consistent proposal emerges for development at Sandleford Park West and to ensure that such a scheme secures planning approval and that it will be delivered alongside the development of the appeal site, to provide sufficient certainty of the co-ordinated and timely delivery of the desired sustainable urban extension across the whole of the SSSA and provide the associated necessary infrastructure in mitigation."

- 2.3 These passages appear to convey that the Council believe the Appellants are under an obligation to positively deliver development at Sandleford Park West (New Warren Farm).
- 2.4 Naturally, the Appellants cannot compel or oblige Donnington New Homes to develop their land in any particular way or at any particular time, but I believe the fact that there are two planning applications which deliver the components of Policy CS3 is highly material.
- 2.5 The extent to which the development proposals advanced by DNH, both for the development of Sandleford Park West and the access proposals for Warren Road, are satisfactory is a matter for the LPA to determine in the context of those applications. In this regard, it is the development proposals shown on its parameter plans which are at more detailed level compared to the Combined Plans that are before the LPA for determination and neither the Appellants nor Donnington New Homes are seeking permission specifically for the suite of Combined Plans. Indeed, Mr Grigoropoulos makes this point at Paragraph 7.70 of his evidence.
- 2.6 I have not been able to identify how the Council determine that the Appeal Scheme restricts, prevents or prejudices the development of Sandleford Park West.
- 2.7 In the following paragraphs I comment on the various sections of Mr Grigoropoulos' evidence under his heading Comprehensive Development (Section 7) because it is apparent to me that the issues raised in respect of this are issues related more to the Donnington New Homes scheme rather than the Appeal Scheme.



Warren Road Trees

- 2.8 Mr Grigoropoulos refers to the potential widening of Warren Road and its effects on trees along the boundary of Park House School at Paragraph 7.71. I have discussed this at Paragraph 9.21 9.24 of my evidence and draw attention to how the current proposals from DNH are different in this regard.
- 2.9 It is suggested that "there is a potential and unnecessary threat to the retention of the important row of trees along the north side of Warren Road" because certain of the Appellants documents, such as the Landscape and Visual Assessment and the Arboricultural Impact Assessment include this. It is important to recognise that until DNH submitted an application relating to the widening of Warren Road on its southern side in December 2020, its proposals had concerned a widening on the northern side and hence those assessments considered that specific proposal. It is, in my opinion, unfair to criticise the Appellants for this or to deduce and allege that the TPO trees are at risk from the Appeal Scheme.
- 2.10 The fact the Appellants assessments which are cited refer to these trees does not mean that those trees are to be removed; as Mr Grigoropoulos acknowledges, they are outside of the Appeal Site and are not part of the Appeal Scheme.
- 2.11 Mr Grigoropoulos then, later in that passage, refers to how the Appellants and Donnington New Homes refer to Warren Road in their respective documents. The Appellants refer to this as a 'historic track / landscape feature', but Mr Grigoropoulos suggests the fact Donnington New Homes refer to it differently (i.e. not an historic track / landscape feature) is symptom of the piecemeal nature of the proposals. I am aware that the Council's previous landscape advisor, Ms Kirkham, refers to Warren Road as a historic track / landscape feature (see Appendix 1). For completeness I include the John Roques' map to which Ms Kirkham refers at Appendix 2. In my view, it is the position that Donnington New Homes has taken in respect of this is the point that Mr Grigoropoulos should be concerned with and this a matter for the LPA to assess in the context of the planning application for the widening of Warren Road and has no bearing on determining the Appeal. To suggest this inconsistency, derived from Donnington New Homes adopting a position different from the LPA's landscape advisor, is in some way a deficiency that sullies the Appeal Scheme is unfair and unjust.

Inconsistencies - Green Links, Buffers, Trees

- 2.12 Mr Grigoropoulos refers to inconsistencies between various documents at Paragraph 7.72. I set out my comments in relation to this at Paragraph 9.13 9.15 of my evidence and provide detailed response to his schedule at *Appendix 3* herein.
- 2.13 At Paragraph 7.73, Mr Grigoropolous draws particular attention to the Combined Green



Infrastructure Plan and the Green Infrastructure Plan for Sandleford Park West to cite the absence on the former of a green link and hedgerow to provide connectivity between Gorse Covert and Brick Kiln Copse shown on the latter. He also cites the absence of a buffer zone to those two woodlands within the Sandleford Park West Site.

- 2.14 These are matters that are directly relevant to the Sandleford Park West application rather than the Appeal Scheme as they are outside the Appeal Site and subject to those development proposals advanced by Donnington New Homes. I presume that the Council would be discussing these matters with the Applicant in that instance. As neither the Appellants or indeed the LPA are suggesting that these Combined Plans are to be 'approved plans' I do not see how this represents a serious concern in relation to the future protection and retention and connectivity of these two woodlands; such measures would be secured through the design of Sandleford Park West and not the Appeal Scheme.
- 2.15 Lastly, at various points in Mr Grigoropolous' evidence he refers to an inconsistency in how the area identified for the expansion of Park House School is shown differently on the Strategic Landscape and Green Infrastructure Plan in comparison with other plans. The purpose of the Strategic Landscape and Green Infrastructure Plan is to set out at a "strategic level" the approach towards these matters; it is not the basis for determining the area of land proposed for the expansion of Park House School. Any inconsistency in these terms is a presentational point rather than a point of substance. The area of land to be provided for the expansion of Park House School is addressed elsewhere.

Duplication - School Expansion Land

- 2.16 Mr Grigoropolous refers to the duplicate provision of land for the expansion of Park House School as the example of competing proposals and unnecessary duplication. I don't believe there are any other such examples.
- 2.17 The Appellants have consistently proposed land for the expansion of Park House School contiguous with its eastern boundary reflecting the initial *Corde Study* included within Mr Hinde's evidence. In the event planning permission is granted for the Appeal Scheme, that would secure the land for the expansion of Park House School.
- 2.18 Donnington New Homes' Planning Statement refers to its education proposals as follows:

"The originally submitted masterplan provided for a 3.6ha "education campus" in the northern part of the site, including 1.4ha for a 1 form entry primary school, with an additional 0.6ha to expand to a 2-form entry school on a 2.0ha site in the future. A further 1.6ha was proposed for the expansion of Park House School, which is located immediately to the north of the site.

The amended masterplan (reference CMP-01RevE) retains the provision of a 1 form-entry



primary school but has re-located it onto 1.4ha of land to the southern end of the "Eastern Fields". There is also sufficient land in this location to expand the primary school to 2 form entry on land immediately south of the Sandleford Park allocation, should that land be allocated for housing development in the future.

In addition, about 1.0ha of land is provided for Park House School expansion, offering the potential to provide an adult sized 4G pitch at the northern end of site, to the south of Park House School. This also provides flexibility for future school expansion, should circumstance require it". (paragraph 9.3, 9.4 and 9.5 refer)

- 2.19 As its Planning Statement refers to, Donnington New Homes have longer term aspirations to develop land to the south of their application site. At paragraph 11.1 DNH refer to this longer-term development potential having influenced the re-design of the current scheme's illustrative Masterplan and Parameter plan. I presume therefore the Donnington New Homes intend to safeguard this land to allow for the further expansion of Park House School in that event. The merits or otherwise of this is, in my view, a matter for Donnington New Homes and the LPA to discuss and agree and does not concern the Appeal Scheme.
- 2.20 Moreover, Appendix 3 of the Donnington New Homes Planning Statement sets out how the amended development proposals respond to comments raised by the (then) Case Officer in 2018. Iin respect of the education provision, the Case Officer notes the area of land to be provided for the expansion of Park House School and requests clarification from the agent of the space for secondary and primary education that was to be provided. I infer from this that the (then) Case Officer was not opposed to this element of provision at that time. I contrast this to the playing fields previously proposed by the Appellants in its 2018 application that the Council expressly asked to be removed from the Scheme.

Connectivity and Permeability

- 2.21 At Paragraph 7.81 Mr Grigoropolous refers to the Appeal Scheme not being part of a comprehensive scheme that guarantees the provision of a vehicular access to the west (New Warren Farm, Warren Road through to Andover Road). I discuss this at paragraphs 8.24 8.30 of my evidence.
- 2.22 Whilst it is correct that the Appeal Scheme does not include an access to Warren Road and Andover Road, the Appellants have long indicated their commitment to provide an access to the boundary of the site to connect to New Warren Farm. Equally DNH have also long indicated that delivering a Warren Road access was their responsibility and they have sought to secure planning permission for this. I do not accept that the contribution strip complicates matters as I have explained in Paragraph 11.5 of my evidence and is in fact a measure to ensure comprehensive development.
- 2.23 At paragraph 7.82 Mr Grigoropolous refers to the possibility that New Warren Farm



either does not secure planning permission or is not developed and that in this circumstance this would leave DPC dependent on vehicular access from the north. As I have indicated in my evidence, this is what the Core Strategy Policy CS3 had anticipated given that it does not require a vehicular access from Warren Road. Permeability for pedestrians to the west would still be possible via the existing Public Rights of Way GREE/9 and NEW/5 which respectively extend through the Appeal Site and to and along Warren Road, as Mr Grigoropolous accepts.

2.24 As I have referred to in my evidence, in the situation that Mr Grigoroplous describes, the bus link would not be formed, but an alternative public transport provision is possible that would serve future occupants of the proposed development as Mr Bird explains; this would accord with Policy CS13.

Main Valley Crossing

- 2.25 Mr Grigoropolous discusses the Main Valley Crossing at paragraphs 7.84 to 7.93. In the first instance he recounts why the Council consider the original proposal to be unacceptable.
- 2.26 At paragraph 7.91, Mr Grigoropolous turns to what he refers to as the "straight span" which I believe is Option 3 or drawings SK023/SK003 in the Valley Crossing Study. He notes that Mr Goddard considers this option to address his concerns in respect of the issue of emergency access to DPC in highway terms. He also notes that this Option negates the need for the alternative emergency vehicular access through the Country Park to the A339. (In Mr Goddard's evidence, this discussion is set out at paragraph 3.4(c) and paragraph 3.5.).
- 2.27 Mr Grigoropoulos further summarises the position of certain of the other Council's witnesses in respect of this matter: "This Option is also beneficial in terms of reducing ecological impacts and harm to trees as set out in Mrs Deakin's and Mr Giles' proofs of evidence although residual concerns remain regarding loss of ecological connectivity and potential impacts on trees".
- 2.28 Mrs Deakin's residual point is set out in para 3.6.11 of her evidence: ..."there is still potential loss of connectivity and harm to bats, barn owls and other bird species and flying insects etc., vulnerable to severance to effects of new roads and bridges". Any Valley Crossing will cause a degree of severance, but this would have been understood by the Council. Significantly, Mrs Deakin refers to "further attention to species specific mitigation requirements" and I infer from this that this residual concern is not insurmountable.
- 2.29 I cannot see where Mr Giles has considered the Valley Crossing in his evidence, so I infer that he has advised Mr Grigoropolous of his opinion directly.



- 2.30 Although Mr Grigoropolous does not refer to it in these passages, Mr Bowden and Mr Flatman also comment on the design options for the Valley Crossing at various points in their evidence.
- 2.31 Mr Bowden refers to the 3rd Option being "the least damaging to the hydrology of the area, and probably the habitat and biodiversity as well". Whilst he refers to "dark zone" underneath the structure and suggests that the watercourse will "not be able to support much in the way of biodiversity once it is built" I don't believe there is a corresponding comment from Ms Deakin in respect of this and Ms Deakin acknowledges that "the 3rd Option significantly reduces the loss of marshy grassland and the linear area of purple moorgrass and rush pastures Habitat of Principal Importance (HPI) within the valley and the adjacent habitat on the valley sides and this is to be commended". Mr West refers to this further in his Rebuttal evidence.
- 2.32 Mr Bowden also refers to construction impacts, although it is fair to say that such impacts would arise in any event; indeed, he refers to the construction of any of the options causing damage to the immediate habitat/biodiversity and hydrology as inevitable.
- 2.33 Mr Flatman also indicates that Option 3 goes part way to addressing the criteria set out in the SPD and that a refinement of the bridge abutment would still be necessary. I have included such a drawing at *Appendix 4* to illustrate how this can be achieved. Mr Flatman also refers to this Option negating the need for the emergency access through the Parkland area and that is this a more appropriate and less harmful solution in landscape terms.
- 2.34 Taking the above together, I believe the view I set out in paragraph 12.29 of my evidence is correct and that at the detailed design stage, an acceptable, appropriate and satisfactory solution can be achieved.

Piecemeal Approach

- 2.35 Mr Grigoropolous is critical that the Appeal scheme has put forward development of part of the Sandleford allocation in a piecemeal fashion.
- 2.36 I have considered carefully the LPA's evidence to the Appeal and have not identified any fundamental criticism of the two adjoining development proposals that go to the heart of the proposition that the Sandleford allocation can be developed in a comprehensive and coordinated manner with the timely provision of infrastructure. Indeed, as Mr Grigoroplous alludes to at Paragraph 7.95, the Council has formed that view too in the emerging Local Plan by no longer requiring a single planning application.
- 2.37 Mr Grigoropoulos sets out his view that the Memorandum of Understanding cannot be



relied upon to ensure, and to provide certainty, that the appeal proposals will secure the sustainable, comprehensive and cohesive development of the whole SSSA and the timely and coordinated delivery of the necessary associated infrastructure. In my view, the Memorandum of Understanding has to been seen alongside the planning obligations that the two applicants propose in order to properly determine whether the development proposals achieve this. The Memorandum of Understanding was intended to provide the framework for the development proposals and the infrastructure commitments provide the measure against which to assess the Appellants' planning obligations and then also those of DNH.

- 2.38 What the Appellants cannot do is require DNH to develop their land in a particular way, or at a particular time. The LPA is charged with assessing those development proposals to ensure they are satisfactory and provide the appropriate and complementary infrastructure provision. But even then, the LPA cannot compel DNH to develop their land should they choose not to.
- 2.39 As such, in the event that the Appeal proposals are considered to be satisfactory in their own terms and that they do not restrict, prevent or prejudice the development of New Warren Farm, and rather they facilitate the development of that land, the Appeal Scheme's contribution to a comprehensive development should be judged to be satisfactory.



3 Affordable Housing

- 3.1 At Paragraph 3.2 of her evidence Ms Robinson refers to the total number of new homes for which permission is sought to be 1080, 80 of which form part of the affordable housing provision but which are to be provided as extra care accommodation. In my evidence I have drawn attention to the fact this approach is supported by the SPD. Ms Robinson goes on to state that the remainder of the affordable housing will be dispersed across the development and refers to 432 as the remaining amount. This is not correct: 40% of 1080 is 432, of which 80 is comprised of the extra care and the remainder is 352 general needs affordable housing.
- 3.2 Ms Robinson later refers to the Council's Adult Social Care response to the application, but I have put the waiting list figure that is cited in the context of the full response at Paragraph 10.19 of my evidence.
- 3.3 Finally at Paragraph 3.20 Ms Robinson states: "It is important that the level of affordable housing, including tenure is agreed at the outline stage and secured via a Section 106 obligation". That is addressed in the Appellants Unilateral Undertaking. It then continues to state "It is the preference for the Council to agree each individual plot location to ensure that satisfactory integration and even distribution with the general market housing has been achieved." It is not clear to me whether Ms Robinson is referring to this being agreed at the outline stage.
- 3.4 For the obvious reason that layout is a reserved matter and is not being determined as part of this Appeal, this is not possible.
- 3.5 Ms Robinson cites certain other applications where this has been achieved, but having investigated these, I believe in those instances the individual locations of affordable homes is determined at the reserved matters stage. Whilst Ms Robinson refers to these being large schemes in the District, none are of the scale of Sandleford Park and would be equivalent only to a main phase. I would expect the affordable housing scheme proposed for each main phase to determine this.



Appendix 1: Kirkham Landscape Planning - response to Application 18/00828/OUTMAJ

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WEST BERKSHIRE COUNCIL

PLANNING APPLICATION NO. 18/00828

SANDLEFORD WEST, NEWTOWN ROAD, NEWTOWN, NEWBURY.

Outline application for up to 500 new homes, including 40% affordable, a 1 form entry primary school with land for its expansion to 2 form entry, replacement and/or expansion land for Park House Academy School, extra care elderly units as part of the affordable housing provision, access from Warren Road and emergency access from Kendrick Road, a recreational facility for families of children with special needs, green infrastructure including children's play areas and informal open space, pedestrian and cycle links through the site, sustainable drainage and other infrastructure. All matters reserved

INTERIM COMMENTS

A. Introduction

- A.1 This application adjoins 18/00764 for Sandleford Park and the submitted plans show how the two developments will work together. The following comments however only relate to Sandleford West. A site visit was undertaken at the end of May.
- A.2 Although the whole of the site is not subject to the requirements of the SPD, it is suggested that in practice it be considered as if it did. The requirements for Sandleford Park in the reasons for refusal for application 16/03309 are therefore applicable.

B. Submissions

WYG ES including Chapter 9 Landscape and Visual Impact

Assessment

Green Infrastructure Plan A090455/SP-05/F

Drainage Strategy Appendices 9.1 to 9.3

Aspect Arboricultural Impact Assessment Sept 2017

C. Relevant Policy

NPPF: Paragraphs 7, 17, 63, 64, 109 to 129

West Berkshire Local Plan Core Strategy CS3; CS.14; CS18; CS19; ADPP1 Sandleford Park SPD Policies L1, L2, L4 to L6; L8 (L2 and L7 relate to

Sandleford Park 18/00764 only)

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D. Comments on the ES Chapter 9

D.1 Policy: The ES covers the relevant Core Strategy policies and refers to SPD policy L4 to L6 and L8. The assessment must also have regard to policies L1 and L2.

- D.2 Cumulative Plan LA.08 needs revising to correct the location of the DPD housing sites and to omit the site known as south of Garden Lane Close (shown as B on the plan).
- D.3 The LVIA should fully consider the guidance within the West Berkshire Landscape Character Assessment 1993 in accordance with the requirements of CS19 as well the Berkshire LCA. The site lies within LCT 15 and LCT18A. The latter will undergo material change with the development of Sandleford Park but both areas provide guidance of value to the LVIA. The West Berks LCA is currently being updated but will not be available until autumn 2018. The LVIA should also be informed by the Landscape Sensitivity Study 2009 LLCAs 15B and 18D.
- D.4 The ES bundles the separate landscape features together in Table 9.8. However the effect on these features varies across the development. I do not agree that they can all be classified as moderate sensitivity as many are high including the pasture, tree lines, ASNW, other woodland blocks. The impact is not small as the development will result in the loss of some features and urbanisation of others. Mitigation is needed and should include infilling of tree lines, new and replacement hedgerows, new tree planting, wildflower meadows, woodland links.
- D.5 The effect on the landscape character is considerable, although it is accepted that the principle of development is agreed. The ES assessment of moderate-minor adverse effects and not significant in Table 9.8 is inaccurate given the scale of change to this landscape.
- D.6 The effects on settlement in Table 9.8 are based on the visual impacts which belong under Visual Effects. There will be an inevitable change to the settlement south of Newbury and west of Wash Common. However the character of the settlement edge will change significantly from very low density with large gardens and tree cover to densities of 30 to 57 dph. The existing large back gardens allow extensive edge of settlement tree planting which has not been replicated see below. Mitigation is needed.

E. Access arrangements

- E.1 At the time of writing the application was in outline with all matters reserved. I understand that access may no longer be a reserved matter.
- E.2 Planning permission was given for a 4.8m wide road access along Warren Road in 2014. This is shown in the Access and Movement Plan and Aspect

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Arboricultural Plan 9219 TCP 02 (North). The application includes for this access arrangement but is only a temporary measure (up to 150 houses). I understand that there are discussions on two alternatives to meet the highway requirements for the remaining houses and a bus access: Option A to widen the road to 6m and introduce a 2m footway and access to parking on the school land or Option B which diverts the road to the north of the line of trees.

- E.3 The line of trees along Warren Road and continuing along the footpath to the northern boundary of the site is an important landscape feature aligning the historic route from Andover Road across the Sandleford Estate to Sandleford Priory. Trees are shown lining this route on the John Rocque map of 1761. For landscape and historic landscape reasons this line of trees should be protected from development, not only as individuals but as a linear group.
- E.4 The current indicative scheme would retain these trees as a group although any works to the footpath extension for any upgrading and access into the site would need to show that the continuing tree line would be unaffected. However it is not clear whether the hedgeline along Warren Road would be retained. This hedgeline is important in retaining the character of Warren Road and visual separation of the school and the existing houses. The replacement of this hedgerow with close boarded fencing would not be acceptable.
- E.5 Option A is not supported. It would:
 - Result in the loss of many of these trees and harm to this historic landscape routeway
 - Removal of the hedgerow along the northern edge of Warren Road
 - Result in a large gap in the continuity of the tree line
 - Would not provide an opportunity to reinstate a new tree line
 - Would change the character of Warren Road
 - Provide very little opportunity for substantive landscape mitigation along the school boundary and to retain the parkland character of the school grounds
 - No details of how the alignment continues eastwards in to the site and avoids harming the tree and hedgerows has been provided.
- E.6 Option B retains the tree line as shown in A090455-SK22/F and uses an existing gap to link the new road alignment with Warren Road. There would an opportunity to enhance the landscape between the two roads. However the plan does not show:
 - The impact on the trees along the footpath
 - The impact on trees and the hedgerow along Andover Road
 - How the southern boundary treatment to the school would be reinstated to separate the school from the road and retain the parkland character of the school grounds.
- E.7 The impact on these trees has always been a concern. Of the above two options Option B is better but needs more detail on the impact on the tree

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line and the trees along Andover Road and hedgerows which contribute to the character of this part of Wash Common.

F. Effects on existing landscape character and structure

- F.1 The Berkshire LCA includes the site in the Greenham Woodland and Heathland Mosaic H2 which has a strategy of conservation. The guidance recommends:
 - Woodland planting following existing patterns of wooded ridges and interconnected valleys
 - Conserving and strengthening boundary features
 - Conserving the rural character of the lanes (I would include the track past Sanfoin)
 - Conserving the wooded context of settlements
 - Taking account of visually prominent higher ground
 - Retention of open views to the south.
- F.2 The site straddles two WBLCA character areas LCT 15 and LCT 18A and two LLCAs 15B and 18D (with the SPD area in the former and Sanfoin in the latter). The principle of development has been agreed on the site but it remains important that the design reflects the requirements for these areas. Principal amongst these are:
 - Maintaining ridge line woodlands as distinctive features
 - New planting of mixed woodlands and hedgerow trees
 - New tree clumps and single specimen trees
 - Screening visually intrusive elements
 - Protecting ancient semi-natural woodland
 - Good management of hedgerows
 - Protecting unspoilt qualities of rural lanes and public rights of way including hedgebanks and verges
 - Respecting the medium-high landscape sensitivity of LLCA15B which extends
 west and south of Sanfoin in particular the local topography; views from River
 Enborne valley and the rising ground to the south of the river; field pattern;
 tranquillity and seclusion beyond the site boundaries
 - Respecting the medium sensitivity of LLCA18D which covers the rest of the site and in particular the views from Sandleford Priory; views from River Enborne valley and the rising ground to the south of the river; the local topography; blocks of woodland, specimen trees and tree clumps; the role of tree cover in softening the edge of settlement; surviving elements of historic interest (especially those associated with Sandleford Priory).
- F.3 The following landscape features need to be retained and protected in their entirety, not just the individual trees, to conserve the character of these features and their contribution to the local landscape:
 - 1. The footpath alignment with hedgerows and mature trees along the northern boundary. Allowing for tree spread, this landscape link should be a minimum of 2m beyond the tree spread
 - 2. The tree line and hedgerows along the eastern boundary, with the access link to Sandleford Park taking advantage of a gap in the tree line. Allowing

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- for tree spread this landscape buffer should be a minimum of 6m wide from the boundary. This will affect the design of the School, Extra Care Housing and Eastern Fields dwellings
- 3. The green link through to the green link in Sandleford Park centred on the retained tree line south of the proposed Extra Care Housing. Allowing for tree spread this landscape link should be 15m wide outside of any gardens or access roads
- 4. The soft open field interface between the southern boundary of the Kendrick Fields and Sanfoin and the woodland of Wildwood
- 5. The tree lined track through the site creating a 15m landscape belt outside of any gardens or access roads
- 6. The mature treed character of the northern part of Sanfoin and tree line to the western boundary. Retain a 10m landscape buffer to the east boundary.

F.4 In the light of the above I am concerned about the potential impact of the following:

- Dwellings and back gardens backing onto the eastern boundary where
 there is insufficient space for retention of the tree line and infill tree and
 hedgerow planting. Both the GI plan and Illustrative Masterplan show only
 intermittent trees along this boundary. This boundary should be retained
 intact and supplemented with native tree and hedgerow planting. An
 alternative layout may need to be considered here. There is similar back
 garden issue with the western boundary
- Proximity of two dwellings to either side of the green link south of the Extra Care Housing
- Lack of landscape treatment to the southern edge of Eastern Fields. This should include a new hedgeline with hedgerow trees to link Gorse Covert with Kiln Copse
- Lack of landscape treatment to the southern edge of Kendrick Fields.
 Small back gardens face onto the open countryside which, with the dwellings, creates a hard edge to the development here. Close boarded fencing or extensions of gardens into the small area of open grassland to the south must be avoided. An alternative layout should be considered here which includes landscape treatment in keeping with the local character
- Lack of landscape treatment to the southern edge of Sanfoin. The site bounds an area of semi-mature woodland planting. The site boundary should be defined by trees to blend into this woodland edge
- Back gardens to plots 13 to 22 and 104 to 112 should not encroach into the landscape buffer around the track. Boundary treatment along here should be native hedgerows
- Car parking and plots 2 to 7 south of Lynwood House should include structural landscape planting to screen views from these two houses
- Lack of landscape treatment to the northern edge to small triangle of ground. Include tree planting along this edge (which may affect the layout here)
- The density of housing in Sanfoin has resulted in the complete loss of the potential for a well tree stocked development pattern in this area.

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G. Visual effects

G.1 I have checked most of the viewpoints and am happy with those submitted except viewpoint 4 but the following viewpoints also need to be assessed:

- From Andover Road looking to Warren Road to assess the effects of the three access options
- From Warren Road to assess the effects of the three access options;
- Effects on several residential properties overlooking the site including those in or off Garden Lane Close, in or off Warren Road, in Kendrick Road and at the end of Round End
- Views from Sandleford Priory. The submitted viewpoint 4 is unhelpful.
 SLR produced photomontage images of view 8 from the Priory showing the extensive view westwards to the woodlands and open fields. This view must be assessed to determine the effect of the proposed development in the southern part of Eastern Fields. The higher density of this area, some up to 3 storeys high, will increase the mass and scale of this built form and potential visibility of the buildings
- Views from the B4640. Viewpoint 15 suggests that the houses would be hidden behind tree cover. This needs verifying as the southern part of Eastern Fields may be visible above Waterleaze Wood.

H. Further proposed changes to the GI Plan and Masterplan

- H.1 In addition to the above I would like to see:
 - the proposed green link through Kendrick Fields to the track to also extend southwards to the southern boundary
 - More substantive space for planting within the individual development areas outside of gardens.
- H.2 All of the above may be detailed design issues but meeting these issues may have a significant effect on the layout and numbers of dwellings.

I. Co-ordination with Sandleford Park

I.1 The single Strategic Landscape and Green Infrastructure Plan for the whole of the allocated site will need to be updated in response to the above.



Appendix 2: John Roques map of 1761





Appendix 3: Appellants' comments of Appendix 1 of Mr Grigoropoulos' Evidence

Inconsistencies and Contradictory Information between Application Submissions and between 'Wheatcroft' Submissions

This is a draft list and is provided without prejudice.

Item No.	Document Title	Reference / Date	Issue	Resolved by Wheatcroft Proposals?	Appellants' comments
1.	Land Use and Access Parameter Plan	14.273/PP02 Rev H1	No emergency access from the A339 to run adjacent to the public right of way is shown as proposed in Appendix E of the Transport Assessment submitted.	N	There is an existing access at this location. The emergency access would be in the form of the use of the proposed pedestrian/cycleway improvement.
2.	Land Use and Access Parameter Plan	14.273/PP02 Rev H1	The area of land proposed for the expansion of Park House School is larger than that proposed on the Strategic Landscape and Green Infrastructure Parameter Plan submitted (drawing number 04627.00005.16.632.13).	N	The area of land to be transferred for the expansion of Park House School is subject to discussion with the LEA and is intended to be confirmed as a Planning Obligation. The area shown on the SLGIP is not definitive and is not intended to represent the area to be transferred.
3.	Land Use and Access Parameter Plan	14.273/PP02 Rev H1	Two 'All Traffic Modes' access points onto Monks Lane are proposed whereas the Monks Lane access plans submitted (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane.	N	Drawing 172985_A_08 includes as one both the roundabout and the minor arm access.
4.	Land Use and Access Parameter Plan	14.273/PP02 Rev H1	The Land Use and Access Parameter Plan proposes a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. Section 4.5.1 of ES Vol. 3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states 'public access will be excluded' for reasons of protection of sensitive flora and fauna.	N	The final footpath routes are to be subject to detailed design in terms of both location (to avoid sensitive flora) and construction (i.e. surfacing, fencing etc). The setts within Gorse Covert are both outliers, one inactive and one disused, therefore at present there would be no impacts. Activity may be increased when it comes to construction at which stage detailed mitigation may be necessary, or alterations to routes. The reference to no public access relates to open access as opposed to managed access along clearly defined paths. Para 3.2.2 is clear in relating to wet woodland in Waterleaze Copse where even managed paths are not proposed.

5.	Land Use and Access Parameter Plan	14.273/PP02 Rev H1	A main access road extending to the east of Crooks Copse is shown but this is not proposed on the Strategic Landscape and Green infrastructure Parameter Plan (drawing number 04627.00005.16.632.13).	N	The Access Plan should take precedence. The SLGIP is not intended to detail highways.
6.	Green Infrastructure Parameter Plan	PP03 Rev G1	The Green Infrastructure Parameter Plan proposes a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. Section 4.5.1 of the ES Vol.3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states 'public access will be excluded' for reasons of protection of sensitive flora and fauna.	N	This repeats Item no. 4 – see comment above.
7.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Scale bar does not reflect scale stated (see attached plans).	N	SLR has confirm scale is correct –WBC to provide further information. (No further information provided as at 15 th April 2021).
8.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	The western access onto Monks Lane and main access road leading from it is shown with a significant area of green amenity space in the location of a green link, as is depicted in the Green Infrastructure Parameter Plan submitted (drawing number PP03 Rev G1). The submitted Illustrative Layout plan (drawing number 171) demonstrates that there is little scope for maintaining a green link in this location.	N – The visibility splay plans submitted under Wheatcroft demonstrate further the limited scope for planting in this area.	Drawing 171 is an illustrative plan. Landscaping is a reserved matter for subsequent approval
9.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Pedestrian access points along south-western boundary with New Warren Farm (Sandleford Park West) differ in location to that shown on Land Use and Access Parameter Plan submitted (drawing number PP02 Rev H1) (see attached plans).	N	The land use and access plan will take priority and will be subject to detailed design to ensure alignment.

10.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Position of access (and green link) exiting Gorse Covert in a northerly direction differs from that shown on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) (see attached plans).	N	This is addressed in evidence to the Inquiry. The final footpath routes are to be subject to detailed design in terms of both location and construction. This is a matter that the Detailed Landscape and Green Infrastructure Design and Management Plan can address.
11.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Proposes trees T218, T219, T220, T221, G223, T230 and T232 to be removed whereas the submitted ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement - drawing number. BC12 and Appendix 2 'Tree Schedule' submitted proposes those trees to be retained along the north-western boundary of the site adjacent to Monks Lane.	In part although T221 is not identified in table 1 of amended ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement, but is now shown as being removed in Appendix 2 – Tree Schedule and drawing number B13a.	BT13a-f resolves this issue. Trees T218, T219, T220, T221, G223, T230 and T232 all shown to be removed. T221 is shown to be removed in the tree schedule in report 14281-AA8-CA which accompanies plans14281-BT13a-f.
12.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Proposes a dedicated recreational route running north from Gorse Covert whereas the submitted Land Use and Access Parameter Plan submitted (drawing number PP02 Rev H1) does not show any route running northwards from Gorse Covert.	N	This repeats Item no. 10 – see comment above.
13.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Proposes trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be retained despite a number of those trees requiring removal to accommodate a proposed access whereas they are proposed to be removed in ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement.	N – Wheatcroft Amended AIA now identifies G247 to be removed which is not a group but a single tree as identified in the tree schedule.	Tree T76 is shown for removal on BT13, but with work on the Valley Crossing a revised plan will show it to be retained. T127, T151, and T173 all need management to make safe. T154 is dead. G117, T246, T247, part of G248 to be removed for Monks Lane G47 – the parameter plan shows an access connecting two parcels, so part of it may need to be removed.

					G68 part to be removed for Valley Crossing G108 part to be removed for access between Crooks Copse and the College boundary
14.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Proposes five trees to be removed along the line of the Crooks Copse Link road whereas ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement Drawing no. BC12 does not identify those five trees, or that there are to be removed.	N	These are not trees, but small bushes and clumps of bramble.
15.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F).	Possibly depending on detailed design of alternative options proposed in Appendix 4 of the appellants' Wheatcroft proposals in their Statement of Case	These are indicative locations for tree planting. This is a matter that the Detailed Landscape and Green Infrastructure Design and Management Plan can address.
16.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	The existing public right of way through the appeal site is proposed to be upgraded to a shared 3m wide path and cycle link contrary to that stated in Appendix E of the Transport Assessment submitted.	N	This is addressed in evidence to the Inquiry.
17.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	Note 2 on this plan advises that ancient woodland areas are to be retained with 15m buffer. Note 1 on this plan confirms that Gorse Covert and Brickkiln Copse are not designated ancient woodlands. Other application documents submitted, including the Environmental Statement, Design and Access Statement and Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) advise that all existing woodland, including non-designated ancient woodland, will be retained with a 15m buffer.	N	This is addressed in evidence to the Inquiry. The 15m minimum buffers are present to all woodlands on the SLGI
18.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	The submitted SLGI Plan (drawing number 04627.00005.16.632.13) proposes public access routes through Gorse Covert, High Wood, Barn	N	This repeats Items no.4 and no.6 - see comments above.

			Copse, Dirty Ground Copse, Waterleaze Copse and Slockett's Copse. Section 4.5.1 of the ES Vol. 3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states 'public access will be excluded' for reasons of protection of sensitive flora and fauna.		
19.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	No green link is shown running north and then west from Gorse Covert, or running to east to west south of Monks Lane, as is proposed on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1).	N	This is a matter that the Detailed Landscape and Green Infrastructure Design and Management Plan can address.
20.	Strategic Landscape and Green Infrastructure Parameter Plan (SLGI)	04627.00005.16.632.13	No main access road extending to the east of Crooks Copse is shown as is proposed on the Land Use and Access parameter plan (drawing number 14.273/PP02 Rev H1).	N	This repeats item no.5 – see comment above.
21.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Scale bar does not reflect scale stated (see attached plans).	N	SLR has confirm scale is correct –WBC to provide further information.
22.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	This plan does not show the green link running north and then west from Gorse Covert, or running to east to west south of Monks Lane, as proposed on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) or the green links within the remainder of the allocated site as shown on the submitted Combined Green Infrastructure Parameter Plan (drawing number PP03 Rev H).	N	This repeats in part Item no.10. This is a matter that the Detailed Landscape and Green Infrastructure Design and Management Plan can address.
23.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	The area of land safeguarded for the expansion of Park House School within the appeal site differs to that shown in the other parameter plans and combined parameter plans submitted.	N – the difference in area of land is increased by the Wheatcroft proposals	This repeats Item no. 2 – see comment above.

24.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	An existing track/footpath running north to south at the eastern end of the country park is proposed to be retained in this plan but is not shown as being retained in the submitted Land Use and Access Parameter Plan (drawing number PP02 Rev H1) or the Combined Land Use and Access Parameter Plan (drawing number PP02 Rev I) submitted.	N	The long-term use of the existing track can be determined through the design of Country Park as part of the Detailed Landscape and Green Infrastructure Design and Management Plan.
25.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	The existing public right of way through the appeal site is proposed to be upgraded to a shared 3m wide path and cycle link contrary to that stated in Appendix E of the Transport Assessment submitted.	N	This repeats Item no.16 and is addressed in evidence to the Inquiry.
26.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Note 2 on this plan advises that ancient woodland areas are to be retained with 15m buffer. Note 1 on this plan confirms that Gorse Covert and Brickkiln Copse are not designated ancient woodlands. Other application documents submitted, including the Environmental Statement, Design and Access Statement and Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) advise that all existing woodland, including non-designated ancient woodland, will be retained with a 15m buffer.	N	This repeats item no.17 – see above comments. The necessary buffer to Brick Kiln Copse would be determined by the LPA/DNH application as it within that Site, not the Appeal Site.
27.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	The hedgerow and amenity land proposed directly to the east of New Warren Farmhouse (in the remainder of the allocated site) is different in size/shape to that shown on the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ).	N	These are design issues associated with the DNH application and does not have a direct bearing on the Appeal Scheme. The broad location of the green corridors/links are the same.
28.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	An area of amenity land is shown to the rear of properties known as Lynwood and Aston House that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I).	N	These are design issues associated with the DNH application and does not have a direct bearing on the Appeal Scheme. The broad location of the green corridors/links are the same.
29.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	An area of amenity land is shown either side of the driveway leading to Wildwoods that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site	N	These are design issues associated with the DNH application and does not have a direct bearing on the Appeal Scheme. The broad location of the green corridors/links are the same.

30.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	(18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I). An area of amenity land is shown along the southern boundary of the remainder of the allocated site and the western boundary of the Sanfoin area of the remainder of the allocated site that is not proposed in the Green Infrastructure Parameter	N	These are design issues associated with the DNH application and does not have a direct bearing on the Appeal Scheme. The broad location of the green corridors/links are the same.
			Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I)		
31.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Proposes trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be retained despite a number of those trees requiring removal to accommodate a proposed access whereas they are proposed to be removed in ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement.	N – Wheatcroft Amended AIA now identifies G247 to be removed which is not a group but a single tree as identified in the tree schedule.	This repeats Item no.13 – see above comments.
32.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Proposes trees T218, T219, T220, T221, G223, T230 and T232 to be removed whereas the submitted ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement - drawing number. BC12 and Appendix 2 'Tree Schedule' submitted proposes those trees to be retained along the north-western boundary of the site adjacent to Monks Lane.	In part although T221 is not identified in table 1 of amended ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement, but is now shown as being removed in Appendix 2 – Tree Schedule	This repeats Item no.11 – see above comments.

				and drawing number B13a.	
33.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Proposes five trees to be removed along the line of the Crooks Copse Link road whereas ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement Drawing no. BC12 does not identify those five trees, or that there are to be removed.	N	This repeats Item no.14 – see above comments.
34.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F).	Possibly depending on detailed design of alternative options proposed in Appendix 4 of the appellants' Wheatcroft proposals in their Statement of Case.	This repeats Item no.15 see above comments.
35.	Combined Strategic Landscape and Green Infrastructure (SLGI) Plan	04627.0005.16.633.14	A break in the tree/hedgerow is shown at the northern end of Brick Kiln Copse is shown that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). This break is clearly required to enable access into the western area of the remainder of the allocated site but is shown as amenity grassland on this plan.	N	This is a design issue associated with the DNH application and does not have a direct bearing on the Appeal Scheme. The broad location of the green corridors/links are the same.
36.	Combined Building Heights Parameter Plan	PP04 Rev H	Does not detail the height in metres as is shown on the Building Heights Parameter Plan submitted (drawing number PP04 Rev G1).	N	This information is on the Building Heights Parameter Plan (drawing 14.273/PP04 G1) which relates to the Appeal Scheme.
37.	Combined Green Infrastructure Parameter Plan	14.273/PP03 Rev H	A significant element of green infrastructure - the tree lined track to the property known as Wildwoods within the remainder of the allocated site – is not shown on this plan but is shown on the Combined Strategic Landscape and Green Infrastructure (SLGI) Plan (04627.0005.16.633.14) submitted and within the Green Infrastructure Plan submitted by the applicants for the remainder of the allocated site	N	This repeats Item no.29 – see above comments.

			(drawing number PP-06 Rev F, 18/00828/OUTMAJ).		
38.	Combined Green Infrastructure Parameter Plan	14.273/PP03 Rev H	Proposed key footpath and cycle links between the appeal site and the remainder of the allocated site are denoted by pink arrows. However, the Access Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) denote those points as pedestrian access points only.	N	This is a design issue associated with the DNH application and does not have a direct bearing on the Appeal Scheme. Links will generally be designed to accommodate pedestrian and cyclists.
39.	Combined Green Infrastructure Parameter Plan	14.273/PP03 Rev H	No buffer is shown to the western edge of Gorse Covert as is shown for all other woodlands within the allocated site and also shown on the Combined Land Use and Access Parameter Plan submitted (drawing number PP02 Rev I).	N	This relates to land proposed by DNH as the Primary School. This is a design issue associated with the DNH application and does not have a direct bearing on the Appeal Scheme.
40.	Combined Land Use and Access Parameter Plan	PP02 Rev I	The proposed buffer to the western edge of Gorse Covert is located within the development area of the proposed primary school.	N	This relates to land proposed by DNH as the Primary School. This is a design issue associated with the DNH application and does not have a direct bearing on the Appeal Scheme.
41.	Combined Land Use and Access Parameter Plan	PP02 Rev I	The proposed Park House School Expansion land within the remainder of the allocated site differs in size from that proposed in the application for the remainder of the allocated site (18/00828/OUTMAJ, Land Use Parameter Plan – 01, drawing number PP-01 Rev B). This plan also omits an area of public open space between the expansion land and the public right of way to the north which is shown on the submitted Combined Green Infrastructure Plan (drawing number 14.273/PP03 Rev H).	N	This is a presentation point –DNH proposals would take precedence.
42.	Combined Land Use and Access Parameter Plan	PP02 Rev I	Proposed key footpath and cycle links between the appeal site and the remainder of the allocated site are denoted by pink arrows. However, the Access Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) denote those points as pedestrian access points only.	N	This repeats Item no.38 – see above comments.
43.	Combined Land Use and Access Parameter Plan	PP02 Rev I	Existing tree lined access to property known as Wildwoods is not shown on this plan as is shown on the Access and Movement Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ).	N	This repeats Item no.29 – see above comments.

44.	Illustrative Layout Plan	171	The existing track to be retained, continuing on from Newbury College and south of the public right of way, as shown on the submitted SLGI Plans (combined and individual, drawing numbers 04627.00005.16.632.13 & 04627.0005.16.633.14) is not shown on this plan.	N	This repeats Item no. 24 – see above comments.
45.	Illustrative Layout Plan	171	Tree (T76) is to be removed as advised in ES Vol. 3 Appendix G11a but is shown as being retained on this plan. Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F).	N	This repeats Item nos. 13 and 15 – see above comments.
46.	Parcelisation Plan	PP05 Rev B	The size/areas of parcels shown for DPN1 and DPN2 differ from those shown on the Country Park Phasing Plan submitted (drawing number 04627.00005.16.306.15.	N	The Country Park Phasing Plan relates to the Country Park and occupations not the development Parcels. This is being discussed at part of the draft planning conditions.
47.	Planning Statement	May 2020 Issue A	Para. 1.4 advises that there are to be two points of access onto Monks Lane. The Monks Lane access drawings (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane.	N	This repeats Item no.3 – see above comments.
48.	Planning Statement	May 2020 Issue A	Para. 1.19 proposes 1.62 ha of land for the expansion of Park House School. Table 4 proposes up to 1.62ha for the extension of Park House School. Appendix 3 advises that 1.62 ha (16,233 sqm) is to be added to the existing school site area. The Land Use and Access Parameter Plan (drawing number PP02 Rev H1) proposes approximately 16,0074sqm or 16.0074ha. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes approximately 9,421sqm or 0.9421ha. The Memorandum of Understanding submitted proposes the transfer of up to 1.6ha of land for the extension of Park House School. ES Vol. 1 Chapter 4 (Proposed Development) states in table 4.1 that up to 1.6ha is to be safeguarded for the expansion of Park House School.	N – the difference in area of land is increased by the Wheatcroft proposals	The area of land to be transferred for the expansion of Park House School is subject to discussion with the LEA and is intended to be confirmed as a Planning Obligation.

			The draft S106 agreement submitted with the application (S106 UU submitted at appeal) states 'no less than 1.6ha'.		
49.	Planning Statement	May 2020 Issue A	Para. 3.13 states that existing trees within Development Parcel North 2 (DPN2) are to be retained with additional planting also. The submitted SLGI Plan (drawing number 04627.00005.16.632.13) proposes the removal of 5 trees within DPN2 and no additional planting.	N	These are trees within the hedgerow required to be removed for the access road to be constructed. Landscaping within the development parcel is a reserved matter.
50.	Planning Statement	May 2020 Issue A	Table 6 - 1st objective - states that the housing mix is to be fixed in accordance with table 7 but no table 7 provided.	N	This is a typographical error– Housing Mix is at Table 3 and Appendix 2. Housing Mix is agreed.
51.	Planning Statement	May 2020 Issue A	Table 5 provides combined plan references that show how the remainder of the allocated site is to be developed. The Combined Strategic Landscape and Green Infrastructure Plan submitted by the applicants for the remainder of the allocated site (18/0828/OUTMAJ) is a different drawing number (04627.00005.16.633.15) to that detailed in this table (04627.00005.16.633.14). The Combined Green Infrastructure Parameter Plan submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) and the applicants for this application is a different drawing number (PP03 Rev H) to that detailed in this table (PP02 Rev H). The Combined Building Heights Parameter Plan submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) and the applicants for this application is a different drawing number (PP04 Rev H) to that detailed in this table (PP02 Rev H).	N	The DNH drawings were submitted on the 25 th September 2020. The only difference is the annotation as it relates to the improvement of the public right of way along Warren Road. The Combined Plans are not application drawings for which approval is sought.
52.	Planning Statement	May 2020 Issue A	Appendix 1 advises that the Main Access Road plan drawing number 14.273 298 has been provided. The Main Access Road plan provided with the application is drawing number 14.273/928 Access Road Plan.	N	There is only one plan – this is a typographical error.
53.	Planning Statement	May 2020 Issue A	Appendix 1 lists advises that the Combined Strategic Landscape and Green Infrastructure Parameter Plan submitted is drawing number 04627.00005.16.632.14. The Combined Strategic	N	This is a typographical error.

			Landscape and Green Infrastructure Parameter Plan submitted with the application is drawing number 04627.00005.16.633.14.		
54.	Planning Statement	May 2020 Issue A	Appendix 3 – IDP Park House School Feasibility Study – Plan of proposed sports playing field appears to breach the 15 metre buffer to the ancient woodland of Barn Copse.	N – proposed earthworks required to level land appear to be within the 15 metre woodland buffer although the information submitted is inadequate to demonstrate no impact on buffer.	The area of land to be transferred for the expansion of Park House School is subject to discussion with the LEA and is intended to be confirmed as a Planning Obligation.
55.	Planning Statement	May 2020 Issue A	Appendix 3 – IDP Park House School Feasibility Study – Area of expansion land denoted by thick grey line differs from that shown on the submitted Land Use and Access Parameter Plan (drawing number PP02 Rev H1), Green Infrastructure Parameter Plan (drawing number PP03 Rev G1), Building Heights Parameter Plan (drawing number PP04 Rev G1) and SLGI Plan (drawing number 04627.00005.16.632.13) as well as the combined parameter plans submitted.	N – the difference in area of land is increased by the Wheatcroft proposals	The area of land to be transferred for the expansion of Park House School is subject to discussion with the LEA and is intended to be confirmed as a Planning Obligation.
56.	Design and Access Statement	February 2020, Issue 8	Figure 33, Section 3.2 and Figure 35 identifies and proposes a green link directly westwards from Gorse Covert into the remainder of the allocated site. The proposed green link from Gorse Covert in the submitted Green Infrastructure Parameter plan (drawing number PP03 Rev G1) runs northwards from the woodland before turning westwards into the remainder of the allocated site.	N	This repeats Item no. 10 – see above comments.
57.	Design and Access Statement	February 2020, Issue 8	Section 4.2.1 states that the development will be supported by c57.58ha (142.28 acres) of Country Park. Section 5.1.1 advises that 84.04ha (207.67 acres) of country park will be delivered.	N	The figures are with and without the woodlands.
58.	Design and Access Statement	February 2020, Issue 8	Figure 44 provides a copy of the SLGI plan submitted (drawing number	N	See above comments.

			(04627.00005.16.632.13) which contains all of the inconsistencies identified above.		
59.	Design and Access Statement	February 2020, Issue 8	Section 7.2.3 advises in key 4 that for details of informal landscape character along woodland buffers refer to SLGI plan. SLGI plan (drawing number 04627.00005.16.632.13) does not show the extent of those buffers nor any detail on the informal landscape character of those buffers.	N	This is referred to in Section 3.0 of the Landscape and Green Infrastructure Design and Management Plan and will be subject to detailed design as referred to.
60.	Transport Assessment	March 2020	Appendix E proposes a cycleway that diverges from the existing prow to go around trees to enable emergency access. This is not shown on any of the parameter plans submitted.	N	This will be subject to detail design.
61.	Transport Assessment	March 2020	Para. 2.4 advises the site is approximately 1.8km from Newbury town centre. Para. 2.17 advises the site is under 2km from Newbury town centre. Para. 2.23 advises the railway station is approximately 2.3km from the site. Table 2.1 of TA and travel plan advises the railway station is approximately 2km from the nearest proposed access. ES Chapter 13 – Transport – page 13-9 advises the site is 3km from the railway station (located at the southern edge of the town centre, closer to the appeal site than the town centre).	N	Distances given in a table in Draft Transport Agreed Statement and dealt with in evidence to the Inquiry.
62.	Transport Assessment	March 2020	Appendix M – Travel Plan. Para. 1.7 Para. 1.7 considers that the overarching principles within this travel plan will also be implemented to SPW (the remainder of the allocated site outside of this application) but does not detail how. Objectives and Targets set out in this travel plan differ to those provided in the Travel Plan submitted by the applicant for the remainder of the allocated site (18/00828/OUTMAJ).	N	The Transport Policy response to the application supersedes this and requests a financial contribution towards Travel Plan measures. The same would be expected in relation to the DNH application to achieve consistency.
63.	Transport Assessment	March 2020	Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix G7 (LGIDMP) advises in para. 2.15 that no lighting is proposed within the country park. ES Vol. 3 Appendix F20 (Lighting Assessment) - No lighting is proposed or assessed within the country parkland.	N	The PROW will be within both an area of built development (DPC) and the Country Park. Lighting may be appropriate in some locations for example where the PROW is within the area of built development. Sensitive, time controlled, low levels downward facing LED lighting in the parkland area may also be appropriate. Any lighting would be subject to detailed design including appropriate lux

					levels to take account of safety and environmental considerations.
64.	Memorandum of Understanding (unsigned)	Dated 6 th May 2020	Drawing number 04627.0005.16.633.14 is stated as being the agreed Combined Strategic Landscape and Green infrastructure Plan however the applicants for the remainder of the allocated site (18/00828/OUTMAJ) have submitted drawing number 04627.0005.16.633.15 as the Combined Strategic Landscape and Green infrastructure Plan, as shown in their own Memorandum of Understanding (signed and dated 10 th June 2020). The details contained within Appendix 2 also differ to the Memorandum of Understanding submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ)	N	DNH submitted this after the Bloor/SFP Application was submitted. The only difference is the annotation for the PROW improvement within the DNH Site. DNH have proposed amendments to its infrastructure proposals but these do not change those of the Appellants' or the overall intention.
65.	Affordable Housing Statement	May 2020, Issue A	Para. 1.3 advises of two points of access onto Monks Lane. The Monks Lane access drawings (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane.	N	This repeats Item no.3 – see above comments. The description of access is not germane to the content of the Affordable Housing Statement.
66.	ES Non-Technical Summary	March 2020, ref: 2017.013	Page 8, figure 4 shows an illustrative masterplan that is not the same as that provided with the application (drawing number 171).	N	The NTS includes an old version of the Illustrative Masterplan, that does not include the updated proposals for Sandleford Park West. However, the correct version of the plan is included in Figure 4.7 of the ES.
67.	ES Non-Technical Summary	March 2020, ref: 2017.013	Page 9, figure 5 shows a Land Use and Access Parameter Plan that is not the same as the one submitted with the application (drawing number PP02 Rev H1).	N	The NTS includes an old version of the Land Use and Access Parameter Plan. However, the correct version of the plan is included in Figure 4.1 of the ES and this was used in the assessment.
68.	ES Vol. 1 Main Text Chapter 4 (Proposed Development)	2017.013.004c	States in table 4.1 that up to 1.6ha is to be safeguarded for the expansion of Park House School. Para. 1.19 of the submitted Planning Statement proposes 1.62 ha of land for the expansion of Park House School. Table 4 of the submitted Planning Statement proposes up to 1.62ha for the extension of Park House School. Appendix 3 of the submitted Planning Statement advises that 1.62 ha (16,233 sqm) is to be added to the existing school site area.	N – the difference in area of land is increased by the Wheatcroft proposals	These difference are not considered to be significant.

			The Land Use and Access Parameter Plan (drawing number PP02 Rev H1) proposes approximately 16,0074sqm or 16.0074ha. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes approximately 9,421sqm or 0.9421ha.		
69.	ES Vol. 1 Main Text Chapter 6 (Ecology)	2017.013.024c	Page 6-22 'Bats' – states that no trees with confirmed bat roosts are to be lost yet then states trees T127 and T130 - which are confirmed bat roosts according to ES Vol. 3 Appendix F7 (section 3.2 and Table 3 and Figure 3) - are to be removed or pollarded as per arboricultural assessment. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Also noted on page 6-30 that no roosting trees are to be removed yet arboricultural assessment (ES Vol. 3 Appendix G11a says otherwise). Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a.	N	These trees do not require removal for the development, but recommendations were made from an arboricultural perspective only. Recommendations for future management to prolong these trees in line with ecological advice can be stipulated.
70.	ES Vol. 1 Main Text Chapter 6 (Ecology)	2017.013.024c	Section 6.4.2 (penultimate bullet point) considers hedgerows A and F are classed as important under the Hedgerow Regulations whereas ES Vol. 3 Appendices F1 (Section 3.2.4) and F18 (section 2.1.4) advise that it is hedgerows A and E.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	As previously clarified, A and E are correct.
71.	ES Vol. 1 Main Text Chapter 6 (Ecology)	2017.013.024c	Section 6.5.3 considers hedgerows C and H are to be improved/infilled by planting whereas Appendix F18 (section 3.4.1) advises that it is hedgerows B and F.	N	As previously clarified, B and F are correct.

72.	ES Vol. 1 Main Text Chapter 6 (Ecology)	2017.013.024c	Section 6.5.1 considers the road crossing to be elevated to reduce impacts on grassland and wetland habitat, however the solution provided is an embankment with a culvert (Transport Assessment, Appendix E, ES Vol. 1 Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9).	N	The Main Text Chapter 4 does not describe the crossing in those terms, and rather makes it clear that this will be designed subject to condition. The ES Chapter was subsequently superseded by a Technical Note on the Valley Crossing and Emergency Access and by the further design work for the valley crossing.
73.	ES Vol. 1 Main Text Chapter 6 (Ecology)	2017.013.024c	Page 6-28 'Species-Rich Hedgerows' – states that c.521m of hedgerow is to be removed. ES Vol. 3 Appendix F10 (Dormouse Survey, section 5.1) advises that a total length of 501m of hedgerow will be lost.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	As previously clarified, 521 is correct.
74.	ES Vol. 1 Main Text Chapter 7 (Landscape)	2017.013.016c	Page 7-20 considers the public right of way through site will be upgraded to be a shared footpath and cycle link, 3m in width. This is contrary to that proposed in Appendix E of the submitted Transport Assessment.	N – the Wheatcroft proposals now refer to a 3m wide emergency access which is also contrary to the 4m wide emerge access proposed in Appendix E of the Transport Assessment.	This repeats Item no.16 and is the subject of evidence to the Inquiry.

75.	ES Vol. 1 Main Text Chapter 7 (Landscape)	2017.013.016c	Page 7-9 refers to the location of veteran trees identified in the corresponding arboricultural survey undertaken by Barrell Tree Consultancy provided in appendix G11 and shown in Figure 7.5. Note 4 of Figure 7.5 (ES Vol. 2 Figures) refers to the Barrell Tree Consulting Assessment (March 2012) but the Barrell Tree Consulting Assessment submitted in G11a is dated January 2020 not March 2012.	N	The initial tree survey was undertaken in 2012, it has since been updated in 2018. It is the current tree survey that has been used in the submitted report.
76.	ES Vol. 1 Main Text Chapter 7 (Landscape)	2017.013.016c	Page 7-10 refers to historic landscape feature shown on Figure 7.5. One of the features shown in ES Vol. 2 Figure 7.5 is the historic track that runs from the A339 along the prow and along Warren Road. This contradicts the submissions made in the ES by the applicant for the remainder of the allocated site (18/00828/OUTMAJ) which considers that Warren Road is not a historic feature.	N	It is shown on the First edition plan of 1873 and the John Roque plan of 1761. Kirkam Landscape Planning refer to this as a Historic Track.
77.	ES Vol. 2 Figure 7.5 (Historic landscape Features)	04627.00005.16.605.0	This figure refers to the Barrell Tree Consulting Assessment (March 2012) in note 4 however the Barrell Tree Consulting Assessment submitted is dated January 2020 not March 2012.	N	This repeats Item no.75 – see above comment.
78.	ES Vol. 2 Figure 7.7 (Country Park Phasing Plan)	04627.00005.16.306.15	The development parcels for DPN1 and DPN2 are not the same as those shown in the Parcelisation Plan ES Vol. 2 Figure 4.5)	N	This repeats Item no.46 – see above comment.
79.	ES Vol. 1 Main Text - Chapter 9 (Cultural Heritage)	2017.013.018c	Section 9.7.1 considers that Warren Road forms the western end of a non-designated historic routeway, contrary to that considered in the ES submission for application 18/00828/OUTMAJ currently being considered for that application.	N	This repeats Item no.76 – see above comment.
80.	ES Vol. 1 Main Text - Chapter 12 (Utilities)	2017.013.020c	Section 12.1 and Page 12-9 refer to an 80 bed care home.	N	The Service Supply Statement is from 2018 and the enquiries are based on an 80 bed care home. There would be no discernible difference in loading.
81.	ES Vol. 1 Main Text - Chapter 13 (Transport and Accessibility)	2017.013.022c	Section 13.3.2 – Assessment Years (page 13-2) considers that the development will be complete by 2031 and this is why an assessment at 2031 has been undertaken. Section 13.6.2 – Construction Phase (page 13-14) states that proposed development is to be constructed over an approximate 14 year period up to 2033. Section 13.6.2 – Occupation Phase (page 13-15) states that 2031 corresponds to the anticipated end of construction of the development.	N	Para 13.6.2 should state 2031 which is consistent with the TA and the rest of the ES.

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			The ES Non-Technical Summary submitted (page 10) considers that construction will last approximately 10 years and ES Chapter 14 (Noise) considers occupation in 2031.		
82.	ES Vol. 2 Figure 13.3 – Improvements to the Cycle Network	Figure 13.3	Shows a proposed cycleway along Andover Road from Warren Road to Buckingham Road as part of the improvements to the cycle network as a result of the Bloor Homes/SFP development (as confirmed in section 13.5.3 of ES Vol. 1 Chapter 13). Figure 6 of the submitted Transport Assessment also shows a proposed cycleway along Andover Road from Warren Road to Buckingham Road as part of the improvements to the cycle network as a result of the Bloor Homes/SFP development. However, the Transport Assessment submitted details in table 4.1 that this is to be provided by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) not Bloor Homes/SFP.	N	Matters discussed with the Council's Highways Development Control Officer and addressed in planning conditions/obligations.
83.	ES Vol. 3 Appendices – D1 (Draft Construction and Environmental Management Plan, CEMP)	March 2020, 2017.013.005b	Table 6.1, item LV3 refers to ES Figure 4.2 as showing the locations of early/structure planting. ES Vol. 2 Figure 4.2 is the Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) which does not show the locations of any early/structure planting.	N	This should refer to Figure 4.3.
84.	ES Vol. 3 Appendices – F1 (Ecological Appraisal)	February 2019, Rev 2	Refers to NPPF 2018, the latest version is 2019.	N	The Ecological Appraisal was produced in early 2019 prior to revision of NPPF.
85.	ES Vol. 3 Appendices – F7 (Bat Roost Assessment)	February 2019, Rev 3	Section 3.2, Table 3 and Figure 3 confirms trees T127 and T130 are active bat roosts to be retained yet the arboricultural assessment submitted with application (ES Vol. 3 Appendix G11a) proposes those trees to be removed or pollarded. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a.	N	This repeats Item no.69 – see above comments.
86.	ES Vol. 3 Appendices – F7 (Bat Roost Assessment)	February 2019, Rev 3	Table 3 advises that tree T48 has ow bat roost potential. Figure 3 does not identify tree T48.	N	Typographical error. T48, 49 and 50 are negligible and coloured green as such in Table 3.

87.	ES Vol. 3 Appendices – F7 (Bat Roost Assessment)	February 2019, Rev 3	Figure 3 – Plotted locations of trees T46 and G47 is in different locations to that shown in ES Vol. 3 Appendix F18 (EMMP) Figure 2.	N	T46 appears to be in the same location on each. G47 refers to a tree group along this boundary although the marker is slightly further north in Appendix F18 compared to F7.
88.	ES Vol. 3 Appendices – F8 (Bat Emergence/ Return Survey)	February 2019, Rev 3	Section 5.1 confirms trees T127 and 130 are active bat roosts to be retained yet the arboricultural assessment submitted with application (ES Vol. 3 Appendix G11a) proposes those trees to be removed or pollarded. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a.	N	This repeats Item no.69 – see above comments.
89.	ES Vol. 3 Appendices – F9 (Bat Activity Report)	February 2019, Rev 2	Section 6.1.5 advises that a bridge will cross the valley to maintain marshy habitat and bat foraging activity. However, an embankment with a culvert is proposed in the submitted Transport Assessment (Appendix F) and Section 5 of the Flood Risk Assessment submitted (ES Vol. 3 Appendix K1).	Possibly if one of the alternative options (VD17562-SK023 / VD17562-STR-SK-003) is considered acceptable, subject to consultation responses.	This repeats Item no.72 – see above comments.
90.	ES Vol. 3 Appendices – F10 (Dormouse Survey)	February 2019, Rev 3	Section 5.1 advises that a total length of 501m of hedgerow will be lost contrary to Page 6-28 'Species-Rich Hedgerows' of ES Vol.1 Chapter 6 which advises that 521m will be lost.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to	This repeats Item no.73 – see above comments.

				correct and reassess the EIA as part of the Wheatcroft proposals.	
91.	ES Vol. 3 Appendices – F10 (Dormouse Survey)	February 2019, Rev 3	Section 5.1 advises that portions of hedgerows G and F are to be removed, neither of which are considered as important under the Hedgerow Regulations. However, ES Vol. 1 Chapter 6 (Ecology), Section 6.4.2 advises that Hedgerow F is considered important under the Hedgerow Regulations. Section 3.2.4 of ES Vol. 3 Appendix F1 (Ecological Appraisal) and Section 2.1.4 of F18 (EMMP) advise that hedgerows A and E are considered as important under the Hedgerow Regulations.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 or ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	This repeats Item no.70 - see above comments.
92.	ES Vol. 3 Appendices – F10 (Dormouse Survey)	February 2019, Rev 3	Section 5.1 advises that figure 2 of ES Vol. 3 Appendix F18 (EMMP) shows the locations of hedgerows and subsequent proposed areas of removal. Figure 2 of ES Vol. 3 Appendix F18 (EMMP) does not identify those areas of hedgerow to be removed.	N	This repeats Item no.73 – see above comments.
93.	ES Vol. 3 Appendices – F12 (Terrestrial Invertebrate Survey)	February 2019, Rev 4	Section 5.2 (1st bullet point) recommends that all areas of marshy grassland will be retained to prevent breaching relevant wildlife legislation. Section 5.2 (2nd bullet point) states that the road across the valley will has been designed as a bridge to allow for the retention of vegetation and associated species. Section 6.5.3 of ES Vol. 1 Chapter 6 (Ecology) advises that an area of marshy grassland will be lost. The proposed valley crossing is an embankment as shown in the submitted Transport Assessment (Appendix F) and ES Vol. 1	N – whilst one of the alternative options (VD17562-SK023 / VD17562-STR-SK-003) may be considered acceptable,	F12 is a technical appendix including baseline data and recommendations. This informs the assessment within the ES Chapter which assesses the small loss of marshy grassland habitat. As above, further design proposals have been proposed in relation to the crossing.

			Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9.	subject to consultation responses, the relevant parts of the ES have not been updated to correct and reassess the EIA.	
94.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Section 2.1.4 advises that hedgerows A and E are considered important under the hedgerow regulations whereas ES Vol. 1 Chapter 6 (Ecology) Section 6.4.2 advises that it is hedgerows A and F.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	This repeats Item no.70 - see above comments.
95.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Section 3.4.1 considers hedgerows B and F are to be improved/infilled by planting. Section 3.4.3 then states that hedgerows B, C, D, and G are to be infilled. ES Vol. 1 Chapter 6 (Ecology) section 6.5.3 advises that hedgerows C and H are to be reinforced/infilled.	N	This is addressed in evidence to the Inquiry. B, D, F and G can be infilled. H will be lost.
96.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Section 4.3.4 advises that a bridge is proposed across the valley to ensure the connectivity of the marshy grassland remains intact. The proposed valley crossing is an embankment as shown in the submitted Transport Assessment (Appendix F) and ES Vol. 1 Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9.	N – whilst one of the alternative options (VD17562- SK023 / VD17562- STR-SK-003) may be considered	This repeats Item no.72 – see above comments.

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				acceptable,	
				subject to	
				consultation	
				responses, the	
				relevant parts	
				of the ES have	
				not been	
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97.	ES Vol. 3 Appendices –	February 2019, Rev 2	Section 4.4 Confirms trees T127 and 130 are active	N	This repeats Item no.69 – see above
	F18 (Ecological		bat roosts yet the arboricultural assessment		comments.
	Mitigation and		submitted with application (ES Vol. 3 Appendix		
	Management Plan,		G11a) proposes those trees to be removed or		
	EMMP)		pollarded. This section then goes on to consider that trees T127 and T130 may require some		
			arboricultural works, but they are as set out in the		
			ES Vol. 3 Appendix G11a as being removed.		
			Important to note that ES Vol. 3 Appendix G7		
			advises that tree works are to be in accordance with		
			ES Vol. 3 Appendix G11a.		
98.	ES Vol. 3 Appendices –	February 2019, Rev 2	Section 4.5.1 advises that 'The [badger] setts within	N	This repeats Item.no 4 – see above
90.	F18 (Ecological	February 2019, Nev 2	Crook's Copse, Gorse Covert, Slockett's Copse,	IN	comments.
	Mitigation and		and High Wood will not be directly impacted by the		Comments.
	Management Plan,		development as there are no proposed building		
	EMMP)		works within 30m of these setts and there are no		
			proposed plans to implement public access into		
			these woodland blocks.'		
			3 rd paragraph of section 3.2.2 of the ES Vol. 3		
			Appendix F18 (EMMP) also states 'public access		
			will be excluded' for reasons of protection of		
			sensitive flora and fauna.		
			The submitted SLGI Plan (drawing number		
			04627.00005.16.632.13), Green Infrastructure		
			Parameter Plan (drawing number PP03 Rev G1)		
			and the Land Use and Access Parameter Plan		
			propose a key footpath/cycle link and potential		
			future link to future 1FE school through the length of		
			Gorse Covert.		
			The submitted SLGI Plan (drawing number		
			04627.00005.16.632.13) also proposes public		
			access routes through Gorse Covert, High Wood,		

			Barn Copse, Dirty Ground Copse, Waterleaze		
99.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Copse and Slockett's Copse. Section 4.8.2 notes that tree T127 is confirmed as a potential nesting sites for barn owls and recognises that the submitted arboricultural assessment recommends felling that tree and if felled would require further surveys and recommendations to inform that work. ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a. Therefore that tree is proposed to be felled and so the recommendations are required now.	N	This repeats Item no.69 – see above comments.
100.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Section 4.8.2 considers that the masterplan retains all of the trees identified as currently having potential or confirmed for nesting barn owl. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes tree T34 (confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5) to be removed as well as ES Vol. 3 Appendix G11a and the submitted Planning Statement (Appendix 3). ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a, including tree T127 (also confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5). Therefore trees T34 and T127 are proposed to be felled (contrary to section 4.8.2 of this document) and update surveys, appropriate avoidance, mitigation and enhancement measures, are required.	N	This repeats Item no.69 – see above comments. T34 can be retained with the revised citing of playing field.
101.	ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP)	February 2019, Rev 2	Figure 2 – Plotted locations of trees T46 and G47 is in different locations to that shown in ES Vol. 3 Appendix F7 ((Bat Roost Assessment) Figure 3.	N	This repeats Item no.87 – see above comment.
102.	ES Vol. 3 Appendices – F20 (Lighting Assessment)	December 2019, Issue 4	No lighting of the proposed playing field within the Park House School Expansion Land (Planning Statement, Appendix 3) is proposed in Figure 7 or assessed as shown in Figure 9 of this document. The submitted Planning Statement, Appendix 3 (IDP Park House School Feasibility Study) advises that the playing pitch is to be an 'all weather pitch' and as such will count twice toward the area calculated for soft outdoor PE. In order for the 'all weather	N – furthermore the appellants have referred to the FA guide in the additional submission following the	The LEA and School has since requested a natural turf pitch which supersedes this.

			pitch' to count twice towards the overall area for soft outdoor PE it will need to be lit in accordance with the 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts'.	Wheatcroft proposals.	
103.	ES Vol. 3 Appendices – F20 (Lighting Assessment)	December 2019, Issue 4	No details of the Technical Lighting Specifications are provided in Appendix B.	N	There is no reference to Appendix B in the main body of the Report. Lighting specification will be determined at the detailed design stage and is intended to be the subject of a planning condition.
104.	ES Vol. 3 Appendices – F20 (Lighting Assessment)	December 2019, Issue 4	No lighting is proposed or assessed within the country parkland. Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix G7 advises in para. 2.15 that no lighting is proposed within the country park.	N	The PROW will be with both an area of built development (DPC) and the Country Park. Lighting may be appropriate in some locations for example where the PROW is within the area of built development. Any lighting would be subject to detailed design including appropriate lux levels to take account of safety and environmental considerations.
105.	ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment)	February 2020, Rev 6	Section 3.2.1 advises that hedgerows A and E are considered important under the hedgerow regulations whereas section 6.4.2 of ES Vol. 1 Chapter 6 (Ecology) advises that hedgerows A and F are important under the hedgerow regulations.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	This repeats Item no.70 – see above comments.

106.	ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment)	February 2020, Rev 6	Table 12 states that 521m of hedgerow is to be removed. ES Vol. 3 Appendix F10 (section 5.1) advises that a total length of 501m of hedgerow will be lost.	Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	This repeats Item no.73 – see above comments.
107.	ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment)	February 2020, Rev 6	Appendix A of this document upon which this assessment is based (in part) provides an outdated illustrative layout plan that is not the one submitted with the application (drawing number 171).	N	This is superseded by evidence to the Inquiry.
108.	ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment)	February 2020, Rev 6	Table 9 refers to 0.25ha of new standing water provision, whereas Table 14 and Section 5.1 refer to 0.15ha of new standing water.		This is superseded by evidence to the Inquiry.
109.	ES Vol. 3 Appendices – G7(Landscape and Green Infrastructure Design and Management Plan, LGIDMP)		Section 4.0 first bullet point advises that a new hedgerow to the south of playing fields will be part of the advanced planting proposals. No playing fields within the Country Park are proposed on the plans submitted and no hedgerow to the south of playing fields (which are not proposed) is shown as advanced planting on the SLGI Plan (drawing number 04627.00005.16.632.13) or the Country Park: Phasing Plan (drawing number 04627.00005.16.306.15) submitted with the application.	N	This is an error – the playing fields proposed in the 2018 application were removed as requested by the LPA.
110.	ES Vol. 3 Appendices – G7(Landscape and Green Infrastructure Design and Management Plan, LGIDMP)		Section 8.10 advises that new native hedgerow planting will take place to enhance connectivity between Gorse Covert and Brick Kiln Copse. The combined SLGI plan submitted (drawing number	N	This relates to the DNH Application.

			04627.00005.16.633.14) proposes no new		
111.	ES Vol. 3 Appendices – G7 (Landscape and Green Infrastructure Design and Management Plan, LGIDMP)		hedgerow planting between those woodlands. Section 9.0 advises that non-ancient woodland will have a 10m buffer contrary to other submissions which advise that all woodlands will have a 15m buffer, such as: Appendix B of ES Vol. 3 Appendix G9 (Heritage and Landscape Assessment); Sections 6.5.1, 6.5.3 of ES Vol.1 Chapter 6 (Ecology); Section 7.5.1 of ES Vol. Chapter 7 (Landscape and Visual Impact); Sections 2.2.2 and 5.3.1 and figure 38 of the submitted Design and Access Statement.	N	A 15m buffer will apply to all woodlands.
112.	ES Vol. 3 Appendices – G7 (Landscape and Green Infrastructure Design and Management Plan, LGIDMP)		Para. 2.15 states that no lighting is proposed within the country park. Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix F20 (Lighting Assessment) has no lighting is proposed or assessed within the country parkland.	N	The PROW will be with both an area of built development (DPC) and the Country Park. Lighting may be appropriate in some locations for example where the PROW is within the area of built development. Any lighting would be subject to detailed design including appropriate lux levels to take account of safety and environmental considerations.
113.	ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment)		Appendix B Development Principle L6 advises that a 3m wide shared footpath and cycle link is to be provided whereas the submitted Transport Assessment (Appendix E) proposes a 3m wide cycleway with a 1m wide soft margin and 1m wide grasscrete section separating the cycleway from the footpath.	N	This repeats Item no.16 and is addressed in evidence to the Inquiry.
114.	ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment)		Section 1.1 refers to a country park phasing plan drawing number 04627.00005.16.306 (Rev 10). The Country Park: Phasing Plan submitted is drawing number 04627.00005.16.306.15	N	. Drawing 04627.00005.16.306.15 is the correct reference
115.	ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment)		Appendix B, Development Principle L6 and P2 refers to ES Figure 4.3 as being the Combined SLGI plan. ES Figure 4.3 is not the Combined SLGI plan (drawing number 04627.00005.16.633.14) but the application site SLGI plan (drawing number 04627.00005.16.632.13).	N	Drawing 04627.00005.16.632.13 is the correct reference
116.	ES Vol. 3 Appendices – G11a (Arboricultural Assessment and Method Statement)	10 th January 2020, ref: 14281-AA7-CA	Table 3 advises that this assessment has considered the Land Use and Access Parameter Plan PP02 Rev A received on 19th February 2018.	N	Typographical graphical error in the report.

	I		The Land Use and Access Parameter Plan		
			submitted is PP02 Rev H1 dated 3 rd February 2020.		
117.	ES Vol. 3 Appendices - G11a (Arboricultural Assessment and Method Statement)	10th January 2020, ref: 14281-AA7-CA	The Tree Protection Plans provided do not identify the five trees to be removed along the line of the Crooks Copse Link road as identified on the SLGI plan submitted (drawing number 04627.00005.16.632.13).	N	This repats Item no.14 – see above comments
118.	ES Vol. 3 Appendices - G11a (Arboricultural Assessment and Method Statement)	10th January 2020, ref: 14281-AA7-CA	The Tree Protection Plans provided and Appendix 2 'Tree Schedule' show trees T218, T219, T220, T221, G223, T230, T232 to be retained along the north-western boundary of the site adjacent to Monks Lane road whereas they are proposed to be removed on the SLGI plan submitted (drawing number 04627.00005.16.632.13).	Y – However, ES Vol. 1 Chapter 7 has not been updated to reassess the LVIA of the amended Appendix G11a upon which that EIA assessment is based.	This repeats Item no.11 – see comments above. The LVIA assumes the losses of these trees because of sight lines.
119.	ES Vol. 3 Appendices - G11a (Arboricultural Assessment and Method Statement)	10th January 2020, ref: 14281-AA7-CA	The Tree Protection Plans provided and Appendix 2 'Tree Schedule' show trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be removed whereas they are not proposed to be removed on the SLGI plan submitted (drawing number 04627.00005.16.632.13), despite a number of those trees requiring removal to accommodate a proposed access.	N	CA-Tree T76 is shown for removal on BT13, but with work on the Valley Crossing a revised plan will show it to be retained. T127, T151, and T173 all need management to make safe. T154 is dead. G117, T246, T247, part of G248 to be removed for Monks Lane G47 – the parameter plan shows an access connecting two parcels, so part of it may need to be removed. G68 part to be removed for Valley Crossing G108 part to be removed for access between Crooks Copse and the College boundary
120.	ES Vol. 3 Appendices – K1 (Flood Risk Assessment and Drainage Strategy)	10309 FRA04 Rv1, Issue 1	Appendix A - Proposed Drainage Strategy Plan (dwg. No. 10309-DR-02) misses the bottom edge of the application site which includes the River Enborne and an existing pond/watercourse as per the FRA submitted with the application. It also omits the remainder of the allocated site to demonstrate that the surface water flow within that	Y – However, ES Vol. 1 Chapter 11 has not been updated to reassess the impact of the	Chapter 11 already demonstrated that the site does not detrimentally impact on any adjacent developments Therefore, no update to Chapter 11 was required. This is accepted in the Council's Statement of Case.

	site does not flow into this application site and therefore how each site is not dependent on the other in respect of surface water drainage.	amended Appendix K1 upon which that EIA assessment is	
		based.	

New Inconsistencies and Contradictory Information as a result of Wheatcroft Submissions

Item No.	Document Title	Reference / Date	Issue	Appellants' Comments
1.	Amended ES Vol. 3 Appendix G11a (Arboricultural Assessment and Method Statement)	14281-AA8-CA, dated 9 th October 2020	Table 1 refers to the removal of G247 but no G247 is shown in Appendix 2: Tree Schedule or in the Tree Protection Plans (BC13a).	Typographical error in Table 1 the report, which should read T247. The plan and tree schedule show it as T247.
2.	Amended ES Vol. 3 Appendix G11a (Arboricultural Assessment and Method Statement)	14281-AA8-CA, dated 9th October 2020	T221 is not identified in table 1 but is now shown as being removed in Appendix 2 – Tree Schedule and drawing number B13a.	T221 is shown on the plan and in the tree schedule to be removed. It needs to be added to Table 1 in the report.
3.	Statement of Case Appendix 4: Valley Crossing Study	Issue A	Option VD17562-SK001 contrary to provision of a bridge as required in ES Vol. 3 Appendices – F9 (Bat Activity Report); ES Vol. 3 Appendices – F12 (Terrestrial Invertebrate Survey); ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP).	This is a design option only.
4.	Statement of Case Appendix 4: Valley Crossing Study	Issue A	The table in 3.1 indicates that the 3rd Option allows for the retention of T69, T77 and T78, this table then goes on to indicate that T69 will be removed.	Typographical error Table 3.1. T69 will have to be removed for all the options. T69 is a moderate quality cat B tree, not high-quality cat A.
5.	Statement of Case Appendix 5: Park House School Playing Field Scheme	001-01122020B	The extent of the proposed expansion land to accommodate an alternative playing field arrangement changes the amount and shape of land proposed which is different to that shown on the following submitted plans that have been used and considered	The area to be laid out as the playing field extends into the area to of built development on the parameters plan i.e. one form of development instead of another. There are no environmental

			through the EIA process in many areas of the EIA to assess the impacts of the proposal: • Land Use and Access Parameter Plan (drawing number PP02 Rev H1); • Green Infrastructure Parameter Plan (drawing number PP03 Rev G1); • Building Heights Parameter Plan (drawing number PP04 Rev G1); • Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) (drawing number 04627.00005.16.632.13); • And the Combined plans of all of the above.	effects associated with this that would need to be assessed.
6.	Statement of Case Appendix 5: Park House School Playing Field Scheme	001-01122020B	The proposed playing pitch is to be an 'all weather' pitch as stated in Appendix 3 (IDP Park House School Feasibility Study_ of the Planning Statement. The 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts' subsequently submitted by the appellants requires this pitch to be lit, fenced to a minimum of 4.5 metres in height and a larger area than that shown in this Wheatcroft proposal. ES Vol. 3 Appendix F20 (Lighting Assessment), upon which ES Vol. 2 Appendix F1 (Ecological Appraisal) and EX Vol. 1 Chapter 6 (Ecology) is based, proposes and assesses the playing pitch as having no lighting. Para. 7.5 of the 'Response to Comments for Consultees' document states that the new playing field proposed at Park House School does not include lighting.	The LEA and School has since requested a natural turf pitch which supersedes this.
7.	Response to Comments for Consultees	September 2020, Issue B	Para. 2.8 proposes a 3m wide emergency access to run adjacent to public right of way and that it has been stated that a 3.75 metre bonded surface is required, both of which are contrary to that proposed in Appendix E of the Transport Assessment and neither proposal is shown on the following submitted plans that have been used and considered through the EIA process in many areas of the EIA to assess the impacts of the proposal: • Land Use and Access Parameter Plan (drawing number PP02 Rev H1); • Green Infrastructure Parameter Plan (drawing number PP03 Rev G1); • Building Heights Parameter Plan (drawing number PP04 Rev G1);	This repeats Item no.16 and is addressed in evidence to the Inquiry.

			Strategic Landscape and Green Infrastructure	
			Parameter Plan (SLGI) (drawing number 04627.00005.16.632.13);	
			And the Combined plans of all of the above.	
8.	Response to Comments for Consultees	September 2020, Issue B	Para. 5.11 considers that to accommodate the enlargement of Park House school contiguous with its boundary the loss of vegetation including tree T34 is unavoidable. A proposed scheme for the enlargement of Park House school that does not propose the removal of tree T34 has been provided in Appendix 5 to the Statement of Case.	This repeats Item no.100 – see above comments.
9.	Response to Comments for Consultees	September 2020, Issue B	Para. 7.5 states that the new playing field proposed at Park House School does not include lighting. The submitted Planning Statement, Appendix 3 (IDP Park House School Feasibility Study) advises that the playing pitch is to be an 'all weather pitch' and as such will count twice toward the area calculated for soft outdoor PE. In order for the 'all weather pitch' to count twice towards the overall area for soft outdoor PE it will need to be lit in accordance with the 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts', subsequently submitted by the appellants after the Wheatcroft proposals.	The LEA and School has since requested a natural turf pitch which supersedes this.
10.	Response to Comments for Consultees	September 2020, Issue B	Para. 7.10 confirms that section 6.4.2 of ES Vol. 1 Chapter 6 is inconsistent in terms of the hedgerows that are designated as important and that ES Vol. 3 Appendix F10 (Dormouse Survey) Section 5.1 advises that a total length of 501m of hedgerow will be lost contrary to Page 6-28 'Species-Rich Hedgerows' of ES Vol.1 Chapter 6 which advises that 521m will be lost. However, updated ES Vol. 1 Main Text Chapter 6 or ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.	This repeats Item nos.70 and 73 - see above comments.
11.	Response to Comments for Consultees	September 2020, Issue B	Para. 7.17 considers that recreational routes through woodlands will be designed to avoid recreational disturbance of badger setts and where necessary will include fencing to prevent public access. Section 4.5.1 of the ES Vol. 3 Appendix F18 (EMMP) advises that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states 'public access will be excluded' for reasons of protection of sensitive flora and fauna.	This repeats Item no.4 – see above comments.

			The submitted SLGI Plan (drawing number 04627.00005.16.632.13), Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) and the Land Use and Access Parameter Plan propose a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. The submitted SLGI Plan (drawing number 04627.00005.16.632.13 proposes public access routes through Gorse Covert, High Wood, Barn Copse, Dirty Ground Copse, Waterleaze Copse and Slockett's Copse.	
12.	Response to Comments for Consultees	September 2020, Issue B	Para, 7.18 considers that if nesting is confirmed in tree T34 (confirmed as a potential Barn Owl nesting site) then the further mitigation set out in the EMMP will be required, including a barn owl nest box to be installed to the edge of each woodland parcel to provide alternative roosting sites. Section 4.8.2 of ES Vol. 3 Appendix F18 (EMMP) considers that the masterplan retains all of the trees identified as currently having potential or confirmed for nesting barn owl. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes tree T34 (confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5) to be removed as well as ES Vol. 3 Appendix G11a and the submitted Planning Statement (Appendix 3) and the amended ES Vol. 3 Appendix G11a submitted as part of the Wheatcroft proposals. ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a.	This repeats Item no. 100 - see above comments
13.	Response to Comments for Consultees	September 2020, Issue B	Para. 7.23 advises that provided the Country Park is operational upon first occupation there would be no significant impact on Greenham Common (SSSI) through recreation. The Country Park: Phasing Plan submitted (drawing number 04627.00005.16.306.15) proposes the provision of the Country Park in two phases with the later phase being delivered with DPC. Therefore the Country Park will not be operational upon first occupation.	The timing of provision of the Country Park is a matter for discussion with the LPA.
14.	Response to Comments for Consultees	September 2020, Issue B	Appendix 2: Flood Risk Assessment revised by Brookbanks – Para. 6.44 states 'Infiltration testing, to BRE365, was completed by GEG in November 2014 with seventeen trial pits completed across the site.' Page ii, Appendix C to the amended FRA under <i>Intrusive Investigation</i> states 'The intrusive investigation was undertaken on the 9th to 12th and 15th September 2014 and comprised the excavation of 18 No. infiltration test pits to depths ranging from	There were 17 trial pit tests carried out. However, one of the test pits was split, resulting in 18 results.

			1.25m to 4.00m bgl targeting the most permeable strata present in each case.'	
15.	Response to Comments for Consultees	September 2020, Issue B	Appendix 2: Flood Risk Assessment revised by Brookbanks - The area of Basin A shown on drawing number 10309DR-02 rev A (Appendix A in the revised FRA) is 5920 m2. The input in the MicroDrainage calculations provided in Appendix B of the revised FRA uses an area of 5650m2.	The designed volume for Basin A is 5650m2. The designed volume on the plan is larger at 5920m2. This was to provide a scheme suitable for the local topography which positively provides additional storage than needed.



Appendix 4: Vectos drawing VD17562-STR-SK-004 – revised bridge abutment



