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Landscape Rebuttal to Mr Mark Flatman APP/ 32

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On behalf of Bloor Homes

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SANDLEFORD PARK

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1.0 INTRODUCTION

1.1 This is a rebuttal to the landscape evidence of Mr Mark Flatman of Liz Lake Associates with respect to his landscape evidence to be heard at the forthcoming appeal. This rebuttal is produced by Julian Cooper FLI of Cooper Landscape Planning, on behalf of Bloor Homes.

1.2 My overall comments are that in his evidence Mr Flatman:

- barely seems to acknowledge that this is an allocated development site, where the Council wish to see development;
- barely refers to the SPD and its associated guidance for that development and its associated parkland;
- does not state whether he supports the guidance in the SPD;
- is critical of the level of detail proposed, but without accepting that detailed design could deal with so many of the issues he raises;
- barely mentions any benefits that would arise because of the proposals;
- does not provide a balance of landscape harm and benefit, as will be incurred by any scheme of this size; and
- does not successfully identify the key harm or harms that leads him to believe that the proposals are unacceptable.

2.0 REBUTTAL

2.1 I do not have any comments on the baseline, as this is largely common to all assessments and interested parties. My comments start at Mr Flatman’s Paragraph 3.3, and for simplicity and ease they are set out in the form of the table below, together with document references.

Mr Flatman’s Paragraph	Issues raised	My Rebuttal	References
3.3.1	The Sensitivity study assumes that development on higher ground is visible	I do not believe this will occur with the application proposals. The sensitivity in the Sensitivity Study (also at APP/5 Page 99) is stated to be medium. The SPD states at page 15 paragraph 46 that, with my emphasis: <i>‘Adverse visual impacts can be avoided through the sensitive location of development toward the <u>less visually sensitive</u> north-western part of the site’.</i>	CD 8.22 and 17.8 See clause 46 of the SPD, landscape, page 15
3.3.2	Development would subsume Enborne Row	This statement is inexplicable. The OS plan shows Enborne Row to lie to the south of the proposals, close to the river, adjacent to the A34. The proposals will not subsume it.	OS Landranger Plan 174 and Google Enborne Row
3.3.3	No reference in LVIA to the employment rugby club etc	The evidence must be taken as a whole. The employment land, rugby club, care home and other larger scale buildings are clearly shown in the site photographs, for example ES photos 7a, 3a, 3b, within the associated tables and site plans.	
3.4.2	Town Design Statement 2017, reference to heathland, open	The SPD is the guiding layout for this scheme, but I have been unable to find any references to heathland. I have said that the parkland design should seek to emulate the 18C 1873 plan which shows	CD 8.24 Cooper APP/

	farmland	heathland and scrub, and this heathland could be part of a long term layout. However, this is a complicated issue with many interested parties, and I suggest that it is more appropriately considered at detailed design.	4 Para 4.5c, page 16
3.5.2	West Drive	The West Drive appears to be the route of my suggested carriageway option. This route is also shown on the John Roque Plan of 1761 as a tree lined informal lane. It is my view that this drive should be part of the parkland, as it was in 1761 and 1873.	ES Appendix G1 historic map 1873
3.5.3	The western parkland has potential, for example when seen from the Priory	Both landscape witnesses agree that the parkland has potential. I draw attention to the fact that historic and registered parkland lies mainly to the east of the Priory, not 'adjacent'. Only the kitchen garden abuts the parkland.	Cooper evidence and 1873 plan
3.5.4	Mr Flatman refers to the 'negative consequences of limited unofficial activity' in the context of future recreational activity.	In my view recreational activity should be welcomed. The third paragraph of the Vision for Sandleford Park, page 7 of the SPD states that, with my emphasis: <i>'The site will conserve and enhance its natural environment and respect its landscape and heritage significance. A significant feature of the site will be the extensive Country Parkland, which will <u>increase public access to the countryside and provide a wide range of informal leisure opportunities.</u>'</i> Under Country Parkland on Page 45 of the SPD it states that <i>'<u>The Country Parkland will provide opportunities for a wide range of recreational activities including a circular walk, a cycle path, educational trails and sculpture trail.</u>'</i> I agree with the SPD. It is my view that public access to the parkland is a key benefit of the proposals. Any harm	See the last sentence of the SPD Vision, page 7.

		should be managed.	
3.6.2	Watership Down and the map in Mr Flatman's Appendix A	<p>This is interesting, but the plan from the book is of course fictional, and does not reference many of the features from the OS plan. Point 1 on the walking plan seems to start in the car park of the rugby club, in the middle of the development complex comprising the rugby club, care home and other employment and leisure buildings and car parks. The route shown in the trail starts here and then goes along busy roads (Monk's Lane and Andover Road), then through housing then across the area proposed by the Council for housing in Figure 7 of the SPD then across the parkland (limited access at present but with the potential for improvement), down another busy road (Newtown Road) and around a busy roundabout.</p> <p>Detailed design could provide the opportunity for a better information trail and enhancement.</p>	Mr Flatman's Appendix A, Photographs 3a-3b. and SPD Figure 7, page 42.
3.7.2	Out of date landscape character documents are 'to be discarded'	LUC say that the landscape character documents are a family, and the 2019 landscape character assessment is an evolution of the earlier studies, and the landscape aspects of the LVIA have been updated accordingly. This is a genuine error by SLR Consulting, but I am puzzled as to why the Council accepted the planning application if the landscape section was seen to be as wrong as they now claim. Mr Flatman's 'negative harm and uninformed judgments' are overstated and not justified.	Section 5, APP/4 and APP/5 Appendix C, page 25
4.2.2	The landscape character assessment should be 'ignored'	As above. It is a balance.	

4.2.4/5	The assessment of the north and western parts of the development is incorrectly downgraded	<p>The north and western part of the proposals are impacted upon and virtually surrounded by the urban area, as shown on Figure 1 of the SPD.</p> <p>Landscape Character Area (not 'LCC') 3b explains that there are views of school buildings and of the rugby club floodlights and that this LCA relates to Warren Lodge Park House School and Andover Road.</p> <p>The landscape section of the SPD explains where the development is proposed, see page 15, paragraphs 45-49. Paragraph 46 states that, with my emphasis: <i>'Adverse visual impacts can largely be avoided through the sensitive location of development towards the less visually sensitive north western part of the site.'</i></p>	<p>See JC photo 3 page 48 of APP/4 and SDP Figure 1.</p> <p>See photos 3a, 3b, 7a and the Parcellation Plan ES 4.5 and Landscape Character Areas 3a and 3b</p> <p>SPD Para 45-49</p> <p>Page 15</p>
4.2.7	LCA WH2 is downgraded and should be medium-high	Kirkham Landscape Planning have previously stated on behalf of the Council that the overall sensitivity of LLCA 18D Sandleford Park is Medium. Reference to the plan on page 101 shows the areas which relate to this assessment to cover the whole of the proposals area. It is my view that the parkland area in view of the Priory should be graded medium high or high, as should the Enborne Valley (see below).	APP/5 Page 101
4.2.8	The Enborne Valley should be of high sensitivity	I have upgraded it as medium-high in my revised landscape assessment, which feels to me about right. Landscape Character Area 2H: Waterleaze Copse (the woodland) states that this woodland has high value and sensitivity	<p>Cooper APP/5 at page 71</p> <p>Cooper APP/4 at page 31 para 7.34</p>

4.2.9	Monks Lane Entrance landscape issues	<p>Links from Monks Lane are required in the SPD and access is an issue that cannot be ignored. The factors governing this area are set out under CA4 Monks Lane, Page 71 of the SPD. There will be landscape and visual effects because of any entrance from Monks Lane.</p> <p>I have set out my design option proposals at my Appendix G. I consider this to be a matter for detailed design</p>	<p>SPD Figure 13 Master Plan Framework and CA4 page 71</p> <p>See APP/5 Appendix G, page 108</p>
4.2.10	The site is a Valued Landscape	Mr Flatman provides no assessment using GLVIA 3 Box 5.1 to support his claim that this is a Valued Landscape.	See APP/5 page 108
4.2.11	<p>The site is semi-rural and</p> <p>The susceptibility for development is medium- high closest to the settlement edge</p>	<p>Development is guided by the SPD. The housing areas proposed in the SDP are impacted upon by the existing housing, school, sports club, rugby club and floodlights. These urban uses are set out at Paragraph 53, page 16 of the SPD: <i>'Other uses typical of the urban edge are also located on top of the plateau, for example the rugby ground, medical centre, Newbury Collage, hotel, retail area and recycling centre.'</i></p> <p>I consider that this should be medium for the fields and high for the woodland, because of the urban edge and the other urban activities referred to in the SPD.</p>	<p>See SDP Fig 1 Site Context and page 16 of the SPD.</p> <p>Cooper APP 5 Page 73 'northern and western parts of site'</p>
4.3.3	Viewpoint 5 Monks Lane: Mr Flatman says that the sensitivity should be	The LVIA assumes low because of the nature of the observer, car borne people going about their business, which is in my experience standard practice, (although I accept there can be	APP/4 page 56

	increased to moderate because of the landscape setting.	differences in opinion). For my part I can accept either low or moderate sensitivity - the Monks Lane entrance is shown on my photograph 11, page 56 of my evidence APP/4, and is clearly not a special view now. I have consulted the SPD and it explains the Monks Lane entrance in the following terms: under Development Principles, page 52 of the SPD it includes the 'urban edge' from Monks Lane, a higher density of dwellings (above 30/ ha), a mix of dwelling types including houses and apartments up to 2-4 storeys (page 71) and with gaps in the built form allowing the retention of some views into the site from properties on the north side of Monks Lane. So, the SPD provides clear guidance as to the nature of the development to be located here, which I note to be reasonably dense and potentially high. A site entrance is inevitable, and this is the Council's chosen place to do so. The consequential effects would apply to any proposals, but I believe they can be properly managed in the way I set out on my option sketch at Page 108 of APP/5.	
4.3.4	Sequential Views should be scored of high sensitivity	I am puzzled: the scores on the sequential sheets show a medium value landscape (typical of the area, but with potential to be of high value), a <u>high susceptibility for change</u> , and an <u>overall high sensitivity</u> .	ES Sequential views 1-4, SLR original ES pages ES G6-3 onwards
5.1.2	Trees should not be removed until detailed design	I agree	
5.1.5	Bridge abutment needs pulling back	Mr Bird has completed this exercise, and the abutment can be moved further, this is now a matter for detailed design.	

5.1.5	The second carriageway is unacceptable	I understand that the crossing has been agreed with the Councils highways department. In my evidence I have said that all crossings would be visually significant, but I have recommended the high level option. It is not unacceptable for the reasons I have given in APP/4 pp 44-47	APP/4 Pages 44-47 Para 10.17
5.1.5	Mr Flatman does not like the severance of Crooks Copse	The road is a requirement of the Council, not of the Appellants. A high level crossing may be possible, but this would impose upon the adjacent housing areas. Overall, I am content with the option that I have put forward in my evidence and consider that it would work well. Further work would be better resolved at the detail design stage.	See my option at APP/5 Sketch L1 Page 106
5.1.10	The new tarmac path and grasscrete emergency track would be harmful, trees would be lost, there is a crossing point over the stream, the basins would be potentially an engineering structure.	See my recommended option for a parkland carriageway along the historic line of the first edition plan and John Roque plan Of 1761. There is no reason why the route of such a carriageway could not be adjusted to avoid tree loss, and this is an appropriate matter for detailed design.	APP/5 page 107 APP/4 Para 10.24- 28, page 49 Also, Picture 20 page 39 of the SPD
5.1.10	The potentially engineered ponds and their locations	At my suggestion, the locations and form of these basins have now moved, see Mr Witts evidence. Picture 22 of the SPD shows an example of a naturalistic balancing pond like what I am proposing as an option for detailed design.	APP/4 see para 10.30-33 and Photos 8 and 9, Sketch L3 page 107 of APP/ 5.
6.1.1	Assessment	This has been updated	APP/5 page

	periods etc		25
6.1.2	Trees will be lost	Inevitably yes, but we seek to minimize the losses, see Mr Alder. Many will be planted for the future.	
6.1.3	The Northern and Western Part of site is under assessed	The SPD acknowledges that there will be changes to the landscape character of the site, and this is true. See the revised LVIA which finds a moderate- substantial landscape harm on Completion (as with any development site), and a Moderate Benefit to the woodland, because of the commencement of the management programme, details of which are to be agreed with the Council. In the long term, after 15 years, the landscape harm from the housing would reduce to Moderate, as the housing settles in, at which point the benefit to the woodland would increase to Substantial, because of long term maintenance and protection of the woodlands.	SPD page 15 Paragraph 47 Table APP/ 5 page 77
6.1.4	A list of harmful elements has been provided by Mr Flatman	I comment on each in turn. Road crossing of the Central Valley is required by the SPD, some effects are inevitable, but location and type chosen is in my opinion the most appropriate in landscape terms, as I set out in my evidence at pp44-47 of APP/ 4 Recreational Paths will not result in 'direct adverse effects', see for example Picture 20 on the SPD, which is in my view perfectly acceptable. SUDS basins can be designed with great sensitivity, as Picture 22 of the SPD illustrates. There is no need for extensive engineering.	SPD Masterplan Framework Fig 13 page 57 See Picture 20 in the SPD, page 39 Development Principles H2 and H3 pp

		<p>The NEAP in LCC 16 (SLR Landscape Character Area 3E Southern Parkland), will be forward planted as set out on ES Plan 7.7</p> <p>LEAP in Valley Corridor LCC 1b (SLR LCA 1b Northern Valley), a sensitively designed LEAP would be ideal in this location</p> <p>Carriageway and lighting, lighting should LED, minimal, downward facing and time controlled, all detailed design issues.</p> <p>Recreational pressure, as my comments above.</p>	43-4 the SPD
6.1.5	Mr Flatman considers there to be Substantial harm initially reducing to Moderate harm in the long term	Substantial harm cannot be right, as a substantial grading is the highest available (as might benefit say a power station). Common sense would determine that there must surely be a benefit from using the parkland for recreational use, and this certainly my view.	
6.1.6	Highclere and Burgclere	The assessment is based on potential views of new parkland when seen from a currently rural location, a perception effect. It is not worth dwelling over.	APP/5 Page 77, top
6.1.8	Mitigation is unsatisfactory	This is wrong. The mitigation is at a strategic level and more would be provided as part of detailed design.	
6.2.2	Benefits	Mr Flatman seems to acknowledge hardly any benefits from the proposals. I do not agree.	Section 3, page 13 APP/4

6.2.8	Planting does not go far enough	I have explained that new tree planting should emulate the 18C layout, without producing a slavish copy of that plan. This would be achieved as part of a master plan for the parkland under a condition or reserved matter to be agreed with the Council. This is a complicated issue with many aspects and should be considered at detailed design, for example the ecological aspects of including new heathland.	APP/ 4 4.5c page 16
6.3.2	Monks Lane Access	This is a requirement of the SPD. There will be some harm from any access, but detailed design solution will follow at the next stage, see APP/5, page 108. I have made my views clear in both APP/ 4 and 5	APP/4 Para 10.36-40
6.3.4	The scale of Priory Benefits	Mr Flatman accepts a minor benefit, which I applaud. However, I believe that the benefit would be much greater, arising from replanting, new grassland, removal of fences, woodland management, perception of the parkland, security for the future, and new public access.	
6.3.4	The harm arising on Viewpoint 19	Viewpoints are agreed in the SCG. The comment about ‘a few parkland trees’ must be put into context, as I consider it to be misdirected. The change of land use to meadow, rationalisation of the spaces, the replanting of the 18C landscape and the forward planted woodland is the approach that might have been suggested by Brown, the new public access, is all in my view a major benefit, as set out in the SPD, Vision, third paragraph, page 7, and Paragraphs 6 and 7 and in particular Paragraph 12 (page 8).	

3.0 CONCLUSIONS

- 3.1 I consider that there will be great benefits arising from this scheme, and I continue to believe that this is the case.
- 3.2 My Flatman has made many criticisms, but few if any of any consequence to the overall findings. He deals inappropriately with the benefits and makes criticism on potential rather than real harm, for example on the retention ponds.
- 3.3 Few considerations are given to the many opportunities for detailed design.
- 3.4 Many of his comments are at odds with guidance in the SPD, for example those regarding public access.
- 3.5 My final comments are that in his evidence Mr Flatman:
- barely seems to acknowledge that this is an allocated development site, where the Council wish to see development;
 - barely refers to the SPD and its associated guidance for that development and its associated parkland;
 - does not state whether he supports the guidance in the SPD;
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