

15th August 2014

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Our Ref: 14/01456/SCOPE

Your Ref: OJ/14.811

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The Town and Country Planning (Environmental Impact Assessment) Regulations 2011

Application 14/01456/SCOPE – EIA Scoping Request for the development of Sandford Park, Newbury.

Thank you for your letter dated 16th June 2014 and received on 19th June 2014, in which you request a scoping opinion for the above development to facilitate the preparation of an Environmental Statement (ES). This Council's comments on the submitted Scoping Report (SR) are below.

In accordance with Regulation 13 (4) of the EIA Regulations I have consulted the required "consultation bodies" as well as non-statutory consultees. A list of the parties consulted is provided in Annex 1. The responses received, provided in Annex 2, are incorporated into this scoping opinion.

Planning Policy Context

The scoping report sets out the relevant national and regional policy documents which will inform the EIA. It also states that the relevant local planning policies will be identified in the ES.

The West Berkshire Development Plan comprises:

- The West Berkshire Core Strategy (2006-2026)
- The West Berkshire District Local Plan 1991-2006 (Saved Policies 2007)
- The Replacement Minerals Local Plan for Berkshire (2001)
- The Waste Local Plan for Berkshire (1998)

You can download copies of these plans from www.westberks.gov.uk/planning

The National Planning Policy Framework (March 2012) (NPPF) sets out the Government's planning policies for England, and it is a material consideration in planning decisions. A copy of the NPPF can be downloaded from <http://www.communities.gov.uk/planningandbuilding/planningsystem/planningpolicy/planningpolicyframework/>

Alternatives

As detailed in the submitted scoping report the development of the site is identified in the Core Strategy and alternatives to the development of the Sandleford Park site were considered during the public examination. As such it is agreed that it is not necessary for the EIA to consider alternative locations for this strategic development proposal.

Furthermore, as identified in paragraph 2.20 of the submitted SR, the 'do nothing' scenario is also not considered a genuine alternative proposition given the allocation of this site in the Core Strategy. It is appreciated that the 'do nothing' scenario may be used for comparative reasons as set out in paragraph 2.20 of the SR.

The alternative disposition of land uses is not considered necessary given the adopted Supplementary Planning Document (SPD) for Sandleford Park, provided the development accords with the land uses set out in the SPD. Should different configurations of land uses be proposed the potential environmental effects will need to be addressed within the ES.

The SR requests the LPA's opinion of the scope of any alternative assessment that might be required (paragraph 2.23 of the Scoping Report). The Sandleford Park SPD sets out options for access to the site in its section on Access and Movement on page 38 of the document.

The options that the SPD sets out, namely an all vehicle access onto the A339 close to the Household Waste Recycling Centre and an all vehicle access link through Warren Road, should be explored in addition to the two accesses off Monks Lane.

The ES should reflect the SPD and assess these options for access arrangements. Much of the detail in relation to this is likely to be included in the Transport Assessment that accompanies the application.

Methodology

The environmental effects from construction activities have been included in the scope (paragraph 3.3). This is important from the point of view of construction traffic and their delivery routes. These activities are likely to be significant and over a build period that covers a number of years. It will be important to consider the timing of mitigation measures and highway network improvements to adequately accommodate construction traffic.

Aside from this the criteria to assess environmental impacts and overall methodology and mitigation strategy set out in paragraphs 3.8 to 3.12 are considered acceptable.

Scope of the Environmental Impact Assessment

The following provides comments on each individual environmental topic identified in the submitted SR.

Cultural Heritage

The SR identifies a number of designated heritage assets, including listed buildings, registered parks and gardens and scheduled monuments close to the proposed site for 2000 dwellings. The chapter on cultural heritage should consider the contribution the setting of each asset makes to the significance of these assets and the impact the development would have on this significance. The impact on nearby undesignated heritage assets will also need to be considered.

Particular attention will need to be given to the impact on the setting of Sandlesford Park, the Grade I listed house and Grade II registered park which lies close to the proposed development site. The building's principle elevation is orientated towards the proposed site and for the purposes of an EIA the impact of the development in views out from the principle rooms of the house and towards the building should be included. Important views both out from the park (i.e. from remaining features of interest such as driveways and the walled garden which lies to the west of the A339) and views towards the park should be identified and the impact of the development on these views analysed.

To the south of Sandlesford Park lies the Scheduled Ancient Monument 'Deserted Medieval Town of Newtown'. The isolated nature of deserted medieval settlements is often an important element of their significance as it is a major contributor to the sense that a visitor gains of a site being deserted. The contribution of a rural setting to the significance of this particular monument needs to be analysed and the inter-visibility of the monument with the proposed development site and the impact of this on significance needs to be assessed.

It is also considered that cross reference should also be made within the Cultural Heritage section to the Landscape and Visual Assessment section of the ES.

In respect of Archaeological matters it is welcomed that archaeological investigation will take place before any development commences. It is considered that West Berkshire's Archaeological Officer, the Garden History Society and the Berkshire Gardens Trust are included in the list of consultees stated in paragraph 4.13 of the SR.

Further to the above, Natural England have also provided detailed guidance in respect of Heritage Landscapes which is attached in Annex 2 of this response. In addition the Berkshire Gardens Trust, on behalf of the Garden History Society have raised a number of points some of which correspond with the comments above. These are also provided in Annex 2.

Landscape and Visual Assessment

The Council's Landscape Consultant has been consulted on the scoping opinion.

It is agreed that the Landscape and Visual Impact Assessment (LVIA) should be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition 2013 published by the Landscape Institute and IEMA. In

general the scope set out in the Boyer Scoping Report is agreed with the following requirements:

1. Landscape and visual impacts must be considered separately as proposed.
2. The LVIA should clearly identify the sensitivity of the landscape and visual receptors; the magnitude of change, the significance of the effect and those effects considered 'significant' under the terms of the Circular. This should be set out in a methodology which clearly explains the proposed definition of the levels of sensitivity, magnitude of change and significance.
3. Assessment of the landscape impact on overall character of the site and the adjacent landscape, as well as the landscape elements and national, county and district character areas;
4. The LVIA should consider any cumulative effects. The scope of the developments to be considered under cumulative impact should be agreed with West Berkshire Council.
5. The applicant should consult with Natural England. The development will also affect the historic landscape and both English Heritage at a national level and the Garden History Society and Berkshire Gardens Trust at the regional/local level should also be consulted.
6. Landscape mitigation should be integral to the whole design and planning process (GLVIA para 4.21 to 4.42).
7. The LVIA should include a description of all the elements of the development which may have a landscape or visual impact including mitigation measures such as noise attenuation and flood attenuation, together with a full description and plan of the proposed landscape mitigation measures.
8. The LVIA should be incorporated into the iterative design process to ensure that adverse landscape and visual impacts are avoided or reduced through the built form and layout design process and that the landscape strategy and Green Infrastructure proposals inform and are fully integrated with the development proposals in all its aspects (GLVIA para 4.5 to 4.10).
9. Opportunities should be sought to provide additional landscape and visual benefits over and above mitigation measures.
10. Assessment at years 1 and 20 is agreed.
11. Private viewpoints should **not** be excluded from the assessment (Boyer para 4.27). It is important that views from Sandford Priory (private school grounds); other adjacent education establishments; property on Monks Lane; the Rugby Club; the kitchen garden (ownership not known); and property in Wash Common are properly assessed. The design of the built form and the landscape strategy and treatment will be in part determined by the visual impact of the development on these private receptors. Representative viewpoints (combining residential property) should be agreed with the Council and permission sought with the owners where it is necessary to have access to private land (see GLVIA paras. 6.17 and 6.36). This would not be a 'residential amenity assessment' but to inform the mitigation requirements and the design process.

12. The LVIA should address the implications of any proposed highway access design.
13. The LVIA should include an assessment of the potential indirect impact on the AONB;
14. The LVIA should be supported by, but not restricted to, the following:
 - Topography plan
 - Site vegetation plan cross referenced to the ecology and arboricultural baseline information
 - Computer generated ZVI with main woodland blocks and built form plotted (radius from the site to be agreed with the Council) for baseline conditions, development built form in Year 1 and in Year 20 using target points (heights) as proposed
 - Landscape character analysis of the proposed development parcels and country park
 - Analysis of the parkland setting to Sandlesford Park
 - Key representative viewpoints, to be agreed with West Berkshire Council;
 - Viewpoint photographs at A3, both panoramic and single shot, and as baseline for photomontages
 - Photomontages from key viewpoints to be agreed with West Berkshire Council
 - Photomontages at the correct viewing distance on A3 with a field of view of 100 degrees (SNH 2006 Appendix C).

In addition the following comments are provided in respect of the SR.

1. Figure 3 does not include the historic environment
2. Para 4.11: should include the setting of the historic park and garden
3. Para's 4.18/4.19: The description of the boundaries of the planning application site is not accurate and should be revised and presented in more detail. For example the land uses to the west are not all relating to the urban area; the river Enborne is an important boundary to the south; the eastern boundary is only defined by the A339 in part and the boundary with the kitchen garden is important.
4. Para 4.20: the condition of the parkland setting should be considered as part of the Heritage assessment and the LVIA and inform the design and management of the Country Park in the interests of conserving and enhancing the parkland setting.
5. Water resource, ecology, noise and heritage topics should inform the LVIA and landscape design, and vice-versa.
6. Appendix 1 refers to topics within the ES Non-Technical Summary. It is assumed that the ES will also include full reports on these topics.
7. The SPD requires the masterplan to create a sense of identity through the creation of character areas. The LVIA should demonstrate how the landscape and visual aspects have contributed to the definition of character

areas and how this contributes to the landscape mitigation of the development.

There are a number of relevant landscape assessments covering the District, to which regard should be had in the ES. These include:

- West Berkshire SPD 2013 and supporting studies/reports
- Berkshire Landscape Character Assessment 2003
- Newbury District Wide Landscape Character Assessment 1993
- Historic Landscape Character Study
- Newbury Landscape Sensitivity Report and its GIS database 2009
- GLVIA 2013
- Landscape Character Assessment guidance 2002
- Photography and photomontage in landscape and visual assessment Landscape Institute Advice note 01/11

Further to the above, Natural England have also provided detailed guidance in respect of Landscape and Visual Impact which is attached in Annex 2 of this response.

It is also considered that the impact on the existing right of way through the site should be covered within this section of the ES and that they should be consulted in respect of this section of the ES. This section of the ES should address the impact on the rural setting and rural views of the right of way with a view to retaining as much of the rural nature of the right of way.

In addition it is considered that the Landscape and Visual Assessment should address the impact of external lighting on the area around the public right of way, cultural heritage assets and general light pollution from the wider area.

Biodiversity

The proposed scope of the biodiversity section of the ES is generally considered acceptable. It is of concern that the Water Resources section does not cover the possible effects of the development on the springs and wet grassland mentioned in Biodiversity section. To maintain the ecological value of the streams and wet grassland areas it is important that the springs continue to operate as at present. Therefore the ES should cover potential impacts on these features of the site and show how they are to be safeguarded.

From the framework plans submitted it is noted that no development will be located near the River Enborne, designated a main river. However it is expected that the impact of the development on biodiversity along the river corridor is assessed as part of the ES. The EA would expect, as a minimum, an 8m buffer zone from the River Enborne.

Given the potential impact on the River Enborne and its associated wetland features, the Environment Agency should be included as a consultee in paragraph 4.41 of the SR.

In general, given the size of the proposed development, biodiversity enhancement needs to be explored across the site, especially the creation of a network of green corridors and wetland habitat to provide ecological enhancement. Opportunities for

the enhancement of biodiversity through the appropriate management of sustainable drainage features should be investigated.

Further to the above, Natural England have also provided detailed guidance in respect of Biodiversity which is attached in Annex 2 of this response.

Greenham Parish Council has noted that a recent application by Newbury College has revealed the presence of Red List endangered birds within the site which should be addressed within the ES.

Soil and Agricultural Resources

In respect of this section of the SR, Natural England state, as detailed in Annex 2 to this letter, that impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. They also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Water Resources

As detailed above the Water Resources section should cover the possible effects of the development on the springs and wet grassland mentioned in Biodiversity section. To maintain the ecological value of the streams and wet grassland areas it is important that the springs continue to operate as at present. Therefore the ES should cover potential impacts on these features of the site and show how they are to be safeguarded.

In respect of Flood Risk if development is only proposed in Flood Zone 1, as demonstrated in the framework plans, the FRA/Surface Water Strategy will need to demonstrate an adequate surface water drainage strategy that demonstrates that the development will not create an increased risk of surface water flooding and consider sustainable drainage techniques.

The applicant should, as part of the surface water strategy, demonstrate that the requirements of local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

A surface water drainage strategy should strive to utilise sustainable drainage techniques, in accordance with the SuDS management train (Ciria C609). Guidance on the preparation of surface water drainage strategies can be found in the DEFRA/Environment Agency publication "Preliminary rainfall runoff management for developments".

SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles.

Further information on SuDS can be found in:

- CIRIA C522 document Sustainable Drainage Systems – design manual for England and Wales
- CIRIA C697 document SuDS manual

Strategic Flood Risk Assessments (SFRA) are undertaken by local planning authorities as part of the planning process. The SFRA may contain information to assist in preparing site-specific Flood Risk Assessments (FRA). Applicants should consult the SFRA while preparing planning applications.

The potential to manage SuDS features for their biodiversity enhancement should be investigated to contribute to a biodiversity net gain.

As confirmed by the Council's Principal Engineer, the site should be self contained in terms of its surface water drainage and all surface water runoff should therefore be dealt with on the site so that there is no off-site discharge. To quote paragraph 1.1 of CIRIA C697 The SuDS Manual, "SuDS objectives are, therefore, to minimise the impacts from the development on the quantity and quality of the runoff, and maximise amenity and biodiversity opportunities" and this should be the overriding philosophy for surface water drainage.

I would advise that a draft SuDS scheme is submitted as a basis for discussion with West Berkshire Council before the site layout is finalised to ensure that good SuDS measures can be accommodated within the site and not squeezed in as an afterthought.

In respect water quality it is considered that water quality must be scoped into the EIA. The proposal is situated next to a watercourse and within Source Protection Zone 2. Currently there is little/no consideration, aside from references to foul water demands under the context of Water Resources (section 4.49).

In addition the ES should consider the impacts of the proposal upon the water environment, for example via surface water runoff and/or disposal, and in turn how it will impact upon Water Framework Directive (WFD) compliance.

An assessment of the current WFD compliance/water environment will be required within the EIA, taking into account whichever Thames River Basin Management Plan (RBMP) applies at the time of compilation/construction. The likely impacts and corresponding mitigation measures necessary to comply with the WFD will need to be set out.

With regard to foul drainage it is considered that the development of approximately 2000 homes and other associated development will place a significant pressure upon the foul drainage infrastructure. It is unclear how foul water will be disposed of, although for a development of this scale it is expected that it will be connected to the existing sewer network.

It is considered that the applicant must, as part of any drainage strategy, liaise with the foul water drainage provider as soon as possible to determine capacity within the associated transport and treatment network, and the nature and timings of any improvements deemed necessary.

The EA request that the risks posed to surface waters due to any changes in quality/ quantity of treated sewage discharges, and the risks of ecological deterioration arising from the above increased effluent and the corresponding impact on meeting Water Framework Directive (WFD) and any potential non-compliance is also assessed.

Thames Water has also been consulted and provides the following comments:

The provision of water and waste water infrastructure is essential to any development.

It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. Thames Water has serious concerns regarding the network in this area and that it may be unable to support the demand anticipated from this development. The developer needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

It is also unclear as to how the development will be constructed; Thames water is concerned that sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses.

We would therefore recommend that any EIA report should be expanded to consider the following.

- The developments demand for water supply and network infrastructure both on and off site and can it be met.
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
- Any piling methodology and will it adversely affect neighbouring utility services.
- There are gravity sewers and distribution mains located within the development site area. The proposed EIA should include information on how these assets will be protected during construction, and also as a result of any vehicle movement within and accessing the site.'

Should you wish to obtain information on the above issues then you should contact Thames Water Developer Services department on 0845 850 2777. If onsite mitigation is found to be necessary this should be covered within the ES.

Human Beings

Paragraphs 4.62 - 4.68 cover the impact that the increase in population will have on existing social and community infrastructure and services in the surrounding area.

When considering this the suitability of access arrangements to these uses and services should be considered when the additional travel activities from the development site are added to the existing baseline situation.

Of particular concern is access to out of town retail facilities and some other nearby facilities. Newbury Retail Park and the Tesco superstore are both close to the development site and are likely to be destinations that are popular with the residents

of Sandleford Park. These retail facilities have access arrangements and parking facilities that currently operate close to capacity at peak times and do not cope at particularly busy periods such as the lead up to Christmas. In addition, the Sainsbury's Petrol Filling Station on Andover Road has issues with access and vehicles queuing on the highway to use the facilities.

Whilst these issues may be outside the control of the applicant as they cannot increase parking capacity at destinations not in their ownership, they are still examples of issues that are considered relevant under this section which looks at the impact on existing social and community infrastructure.

The consultation detailed in paragraph 4.68, in respect of the impact on human beings, should include Greenham Parish Council as a major part of the Sandleford Park site is located within this Parish. In addition the neighbouring Local Authority, Basingstoke and Dean should also be included together with the neighbouring Parish Council, Newtown.

Furthermore the ES should include the impacts on the population of Greenham given that the majority of the site is located within the Parish.

These parties have been consulted in respect of the SR and their responses are provided in Annex 2.

In respect of the SR and education it is noted that paragraph 2.2 identifies the provision of a new primary school. However as raised in recent discussions it is considered that there will be a requirement for more than one primary school.

In line with comments received from the Access Officer, the ES should consider the increase in the aging population and proportionately high level of Autistic Spectrum Disorders diagnosed in Berkshire.

It is noted that a section of the south-western corner of the rugby ground is included within the proposed application site. Sport England has been consulted and their full response is provided in Annex 2 of this letter.

The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Consequently, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of onsite facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. Details can be found at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/>

Transportation

There is additional information that could be supplied to help with the baseline information section, particularly in relation to bus services. There will also be

information from the Personalised Travel Planning Project (see: <http://info.westberks.gov.uk/index.aspx?articleid=29614>) being carried out currently in the area around the development site which may be of use. This will be available late Autumn 2014.

The extent of the TA, the junctions to be assessed and the forecast years will need to be agreed with the Council. It is understood that the scope for the TA is under consideration. The Council's modelling tools (where appropriate) should be used to feed into the TA.

Road Safety is an aspect that is not mentioned in the Transportation section. I would suggest that this should be included in the scope of the ES given its serious impact on the population. Accident records are available via the Council's road safety team.

The Access Officer and Public Rights of Way Officer should be included within paragraph 4.85 of the submitted SR.

It is considered that the ES should include an assessment of the pedestrian and cycle links to Greenham Common from the development area.

Neighbouring Newtown Parish Council, within Basingstoke and Dean Local Authority, consider that the ES/TA should include an assessment of the impact on the B4640 as vehicles heading south on the A339 provides for access to the A34 via the B4640. Furthermore junction assessments should include the A339/Newbury Retail Park roundabout and the junction with the household waste recycling centre on the A339.

Noise

It is considered that the SR is not sufficient in that the effect of noise from existing noise sources other than road traffic has not been listed as being to be assessed. For example the layout shows new residential receptors are in close proximity to the existing Newtown Road Household Waste and Recycling Centre. The section of the ES regarding noise should include this noise source. Also the noise impact from any new part of the development will need to be suitably assessed, for example the energy centre.

It is also considered that the ES should include the noise levels for users of the right of way and seek to reduce those noise levels where necessary.

Air Quality

Natural England note in Annex 2 of this letter that the ES should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

It is considered that the approach provided in the SR in respect of air quality is acceptable.

Construction

As previously mentioned the construction activities are likely to be significant and over a build period that covers a number of years. It will be important to consider the

timing of mitigation measures and highway network improvements to adequately accommodate construction traffic.

Thames Water note in their response that there is concern that sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses. As such the construction section of the ES should detail any piling methodology and whether it adversely affects neighbouring utility services. In addition there are gravity sewers and distribution mains located within the development site area. As such the ES should include information on how these assets will be protected during construction, and also as a result of any vehicle movement within and accessing the site.

Cumulative Effect

As set out by Natural England a full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

As noted by Greenham Parish Council, the current development at nearby Newbury Racecourse should be included in the assessment of the cumulative effect. It is also considered that the following proposed or reasonably foreseeable developments should be taken into account in the preparation of the ES:

- North Newbury (Application submitted – awaiting registration)
- London Road Industrial Estate redevelopment (see Strategic Housing Land Availability Assessment (SHLAA)).
- Market Street Redevelopment (see Strategic Housing Land Availability Assessment (SHLAA)).
- Land north of Newbury College (NEW012 in Site Allocations DPD – Preferred Options Consultation July 2014)
- South East Newbury, Land to the north of Haysoms Drive and land adjoining Equine Way (NEW047D in Site Allocations DPD – Preferred Options Consultation July 2014)
- South of Warren Road (NEW104 in Site Allocations DPD – Preferred Options Consultation July 2014)
- Land at Bath Road, Speen (NEW042 in Site Allocations DPD – Preferred Options Consultation July 2014)

- Land at Coley Farm, Stoney Lane (NEW045 in Site Allocations DPD – Preferred Options Consultation July 2014)
- Land at Moor Lane Depot (NEW106 in Site Allocations DPD – Preferred Options Consultation July 2014)
- Newbury Rugby Football Club, Monks Lane, Newbury (application ref: 13/02581/COMIND)
- Greenacres Leisure, Pyle Hill, Newbury (application ref: 12/02884/FULEXT)

Details of some of these sites can be found in the 'Housing Site Allocations Preferred Options Development Plan Document' which is currently out for consultation. The document and associated information can be viewed on our website here: <http://info.westberks.gov.uk/index.aspx?articleid=30382>

Other potential sites are identified within the Strategic Housing Land Availability Assessment (SHLAA) which can be viewed on our website here: <http://info.westberks.gov.uk/index.aspx?articleid=28794>

Additional Environmental Topics To Be Included In The ES

Section 6 of the submitted SR details environmental topics that are not intended to be included within the ES.

Consideration of each of these topics is provided below.

Arboriculture

Natural England considers in their response provided in Annex 2 that Ancient Woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 118) which states:

'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.'

There is a significant amount of Ancient Woodland located within the site and a significant amount of development is proposed to be located adjacent to the Ancient Woodland, as well as ordinary woodland. It is acknowledged that a 15 metre buffer to Ancient Woodland and ordinary woodland is proposed. However, given the importance of this woodland and the potential for a significant impact from the construction and future occupants of the development, it is considered that the impact on Arboriculture should be included in the ES.

Utility Services/ Infrastructure

As previously noted under the 'Water' section of this response Thames Water have identified a number of issues that need to be addressed within the ES. Some of these matters could be addressed within the 'Water' section of the ES. However some of the matters raised by Thames Water, such as demand for water supply and sewage treatment and network infrastructure, both on and off site, would be better

addressed under a separate section in respect of Utility Services/Infrastructure, together with the impact on other utility services and infrastructure.

Environmental Topics Not To Be Included In The ES

Rights of Way

As identified previously the impact on public rights of way can be addressed within other sections of the ES such as Landscape and Visual Impact, Human Beings and Transport and Noise.

Ground Conditions

As detailed in the consultation response from the EA it is considered unlikely that contaminated land would be a very significant factor to this development and therefore it is agreed that ground conditions would not need to be included within the ES.

The Principal Minerals and Waste Planning Officer considers the approach set out in paragraph 6.14 of the submitted SR to be acceptable. The issue of mineral safeguarding and potential prior extraction is a matter that the developer will need to address in the near future, prior to the production of the ES, and therefore it is advised that contact with the Principal Minerals and Waste Planning Officer is made at the earliest opportunity to ensure that the content, remit and approach to be pursued is acceptable.

The contact details for the Principal Minerals and Waste Planning Officer, Matt Meldrum are: tel: (01635) 519157; email: mmeldrum@westberks.gov.uk

I trust the above information is of use in preparing the forthcoming ES.

A copy of this scoping opinion will be placed on the Planning Register.

Yours sincerely,



Gary Rayner
DEVELOPMENT CONTROL MANAGER

Enc: Annex 1 - List of the parties consulted; Annex 2 – Consultation responses received.

Annex 1 - List of the parties consulted

Consultee	Response Received
Environment Agency	Yes
Natural England	Yes
English Heritage	Yes
Sport England	Yes
Ecology	Yes
Archaeology	Yes
Conservation	Yes
Drainage	Yes
Public Protection	Yes
Waste Services	Yes
Public Rights of Way	Yes
Thames Water	Yes
Berkshire Gardens Trust	Yes
Landscape Assessor	Yes
Greenham Parish Council	Yes
Open Space / Countryside	Yes
Newtown Parish Council (consulted by B&D Council)	Yes
Basingstoke and Dean Council	Yes
Housing	Yes
Access Officer	Yes
Education	Yes
Adult Social Care	Yes
Minerals and Waste	Yes
Highways	Yes
Transport Policy	Yes
Planning Policy	No
Tree Officer	No
Highways Agency	No
Canal and Rivers Trust	No
Garden History Society	No
Forestry Commission	No
Newbury Town Council	No
Economic Development Officer	No
Police	No
Berkshire Fire and Rescue	No
Libraries	No
Agent for application	No

Annex 2 – Consultation Responses Received

Mr Jake Brown
West Berkshire District Council
Council Office Market Street
NEWBURY
Berkshire
RG14 5LD

Our ref: WA/2014/118160/01-L01
Your ref: 14/01456/SCOPE
Date: 30 July 2014

Dear Mr Brown

Proposal: EIA Scoping Request (proposed development of around 2000 dwellings plus a local centre with retail and commercial uses)

Address: Sandleford Park, South Monk Lane, Newbury, RG14 7TD

Thank you for referring the above application. We apologise for the delay in our response.

We have reviewed the EIA scoping report (Issue 2), prepared by Boyer Planning, dated 13 June 2014, and we have the following comments, under the headings below to make:

4. Water Resources

Flood Risk

We are pleased that a Flood Risk Assessment and Surface Water Strategy will be prepared, as stated in paragraph 4.53. This will need to be included as part of the Environmental Statement (ES).

The majority of the site lies within Flood Zone 1, and is partially within Flood Zones 2 and 3, associated with the River Enborne. We would expect that all development be located in Flood Zone 1, as demonstrated on the framework plans.

If development is only proposed in Flood Zone 1, as demonstrated in the framework plans, the FRA/Surface Water Strategy will need to demonstrate an adequate surface water drainage strategy that demonstrates that the development will not create an increased risk of surface water flooding and consider sustainable drainage techniques.

The applicant should, as part of the surface water strategy, demonstrate that the requirements of local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

A surface water drainage strategy should strive to utilise sustainable drainage techniques, in accordance with the SuDS management train (Ciria C609). Guidance on the preparation of surface water drainage strategies can be found in the

Cont/d..



DEFRA/Environment Agency publication "Preliminary rainfall runoff management for developments".

SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity.

The variety of SuDS techniques available means that virtually any development should be able to include a scheme based around these principles.

Further information on SuDS can be found in:

- CIRIA C522 document Sustainable Drainage Systems – design manual for England and Wales
- CIRIA C697 document SuDS manual

Strategic Flood Risk Assessments (SFRA) are undertaken by local planning authorities as part of the planning process. The SFRA may contain information to assist in preparing site-specific Flood Risk Assessments (FRA). Applicants should consult the SFRA while preparing planning applications.

The potential to manage SuDS features for their biodiversity enhancement should be investigated to contribute to a biodiversity net gain.

Water Quality

Water quality must be scoped into the EIA. The proposal is situated next to a watercourse and within Source Protection Zone 2. Currently there is little/no consideration, aside from references to foul water demands under the context of Water Resources (section 4.49).

There is no consideration of the impacts of the proposal upon the water environment, for example via surface water run-off and/or disposal, and in turn how it will impact upon Water Framework Directive (WFD) compliance.

An assessment of the current WFD compliance/water environment will be required within the EIA, taking into account whichever Thames River Basin Management Plan (RBMP) applies at the time of compilation/construction. The likely impacts and corresponding mitigation measures necessary to comply with the WFD will need to be set out.

Foul drainage

Approximately 2000 homes and other associated development will place a significant pressure upon the foul drainage infrastructure. It is unclear how foul water will be disposed of, although for a development of this scale it is expected that it will be connected to the existing sewer network.

The applicant must, as part of any drainage strategy, liaise with the foul water drainage

provider as soon as possible to determine capacity within the associated transport and treatment network, and the nature and timings of any improvements deemed necessary.

We request that the risks posed to surface waters due to any changes in quality/ quantity of treated sewage discharges, and the risks of ecological deterioration arising from the above increased effluent and the corresponding impact on meeting Water Framework Directive (WFD) and any potential non-compliance is also assessed.

Biodiversity (wet)

While it appears that from the framework plans, that no development will be located near the River Enborne, designated a main river, we would expect that the impact of the development on biodiversity along the river corridor is assessed as part of the ES. We would expect, as a minimum, an 8m buffer zone from the River Enborne.

Given the potential impact on the River Enborne and its associated wetland features, we would suggest that you also consult the Environment Agency on the Ecological Impact Assessment.

In general, given the size of the proposed development, biodiversity enhancement needs to be explored across the site, especially the creation of a network of green corridors and wetland habitat to provide ecological enhancement. Opportunities for the enhancement of biodiversity through the appropriate management of sustainable drainage features should be investigated.

6. Environmental Topics not to be included in the ES

Ground conditions

This site is within Source Protection Zone (SPZ) 2 for a public water supply abstraction. It is likely that this SPZ will be largely isolated from the surface by London clay which underlies the site.

We would agree that it is unlikely that contaminated land would be a very significant factor to this development. As such we would have no requirement for this to be assessed as part of the ES, however we would expect as a minimum a desk top study to be submitted as part of the application. Some localised contamination could be suspected, such as isolated areas of made ground or private oil tanks. This would need to be dealt with at the planning permission stage.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Mr Gareth Johns
Planning Advisor

Direct dial 01189 535498

Direct e-mail planning-farnham@environment-agency.gov.uk

Date: 24 July 2014
Our ref: 125528
Your ref: 14/01456/SCOPE



Customer Services
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CW1 6GJ

T 0300 060 3900

Jake Brown,
Senior Planning Officer,
Planning and Countryside,
West Berkshire,
Council Market Street,
Newbury,
RG14 5LD

BY EMAIL ONLY

Dear Jake Brown,

Environmental Impact Assessment Scoping consultation (Regulation 15 (3) (i) of the EIA Regulations 2011): EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 07 July 2014 which we received on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Mary Tomlinson on the contact details below. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from

<http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainable/environmental/environmentalimpactassessment/noteenvironmental/>

Yours sincerely,

M. Tomlinson

Mary Tomlinson
Lead Adviser
Sustainable Development and Regulation
Thames Valley Team
Tel: 07771 834 975
Email: Mary.tomlinson@naturalengland.org.uk



Our ref: 125528
Your ref: 14/01456/SCOPE

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2011, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.118 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall

within the scope of the Conservation of Habitats and Species Regulations 2010. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

Under Regulation 61 of the Conservation of Habitats and Species Regulations 2010 an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is in close proximity of the following designated nature conservation sites:

- Greenham & Crookham Commons SSSI

For this Site, we would expect to see the following information included in the documentation:

- An assessment of the potential impacts upon the designated interest features of the SSSI as a result of the potential increased recreational pressure. In order to address the potential impacts of increased visitor numbers, we would advise that an open space strategy is designed and included within the proposed development area.

If the applicant requires advice on this specific element, then we would wish to direct them to our Discretionary Advice Service (DAS), which is our pre-application advice service:

<http://www.naturalengland.org.uk/ourwork/planningdevelopment/das/default.aspx>

Reasoning: Natural England is concerned about the potential impact of increased visitor numbers on the interest features of the SSSI. The proposed development is close to Greenham & Crookham Common SSSI and would be considered to be within walking distance and therefore accessible.

Further information on the SSSI and special interest features can be found at www.natureonthemap.naturalengland.org.uk. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSI, and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2010

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises

on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (eg from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (eg whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Designated Landscapes and Landscape Character

Nationally Designated Landscapes

As the development site is within of 1.8km of the North Wessex Downs Area of Outstanding Natural Beauty (AONB), consideration should be given to the direct and indirect effects upon this designated landscape and in particular the effect upon its purpose for designation within the environmental impact assessment, as well as the content of the relevant management plan for the AONB. We would advise early consultation with the AONB Unit.

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm and further information can be found on Natural England's landscape pages [here](#).

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate. The EIA should consider also potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 109), which should be demonstrated through the ES.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the

development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Ancient Woodland – addition to the S41 NERC Act paragraph

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 118)² which states:

'Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.'



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SOUTH EAST OFFICE

Mr Jake Brown
West Berkshire District Council
Planning and Countryside Service
Council Offices, Market Street
NEWBURY
Berkshire
RG14 5LD

Direct Dial: 01483 252078
Direct Fax: 01483 252001

Our ref: PA00344285
Your ref: 14/01456/SCOPE

4 August 2014

Dear Mr Brown

Request for Pre-application Advice

SANDLEFORD PARK, NEWTOWN ROAD, NEWTOWN, NEWTOWN, BERKSHIRE

Thank you for consulting English Heritage on the scoping opinion for an EIA for the upcoming outline application for 2000 dwellings on the strategic site allocation at Sandleford Park.

The scoping opinion identifies a number of designated heritage assets, including listed buildings, registered parks and gardens and scheduled monuments close to the proposed site for 2000 dwellings. The chapter on cultural heritage should consider the contribution the setting of each asset makes to the significance of these assets and the impact the development would have on this significance. The impact on nearby undesignated heritage assets will also need to be considered.

Particular attention will need to be given to the impact on the setting of Sandleford Park, the grade I listed house and grade II registered park which lies close to the proposed development site. The building's principle elevation is orientated towards the proposed site and for the purposes of an EIA the impact of the development in views out from the principle rooms of the house and towards the building should be included. Important views both out from the park (i.e. from remaining features of interest such as driveways and the walled garden which lies to the west of the A339) and views towards the park should be identified and the impact of the development on these views analysed.

To the south of Sandleford Park lies the Scheduled Ancient Monument 'Deserted Medieval Town of Newtown'. The isolated nature of deserted medieval settlements is often an important element of their significance as it is a major contributor to the sense that a visitor gains of a site being deserted. The contribution of a rural setting to the



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www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



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significance of this particular monument needs to be analysed and the inter-visibility of the monument with the proposed development site and the impact of this on significance needs to be assessed.

Yours sincerely

Alice Brockway

Assistant Inspector of Historic Buildings and Areas

E-mail: alice.brockway@english-heritage.org.uk



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SANDLEFORD PARK, NEWTOWN ROAD, NEWTOWN, NEWTOWN, BERKSHIRE
Request for Pre-application Advice

Information Provided

Sandleford Framework Plans, Sandleford Park ES Scoping Report.

Published Guidance

Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment.



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English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.

FAO: Jake Brown
West Berkshire Council
Avonbank House
West Street
NEWBURY
RG14 5LD

28 July 2014

Our Ref: SE/WB/2014/36777/P

Dear Jake,

Site: Sandleford Park, Newtown Road, Newbury, RG14 7TD
Proposal: Scoping opinion for up to 2,000 dwellings at Sandleford Park.

Thank you for consulting Sport England on the above application for a scoping opinion.

Summary:

Sport England will assess a forthcoming application for planning permission against its adopted planning policy objectives. The population of the proposed development will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities. Sport England will seek to ensure through the planning process that the proposal meets any new sports facility needs arising as a result of the development. Sport England expects any forthcoming application for planning permission to demonstrate how the requirements regarding sports facilities set out in the Governments National Planning Policy Framework (NPPF) will be met.

The site is not considered to form part of, or constitute a playing field as defined The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184).

Sport England will assess a forthcoming application for planning permission against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Consequently, Sport England considers that new developments should be required

to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.

This requirement is supported by the Governments National Planning Policy Framework (NPPF). Paragraph 17 sets out 12 land-use planning principles that should underpin both plan-making and decision-taking. One of the 12 principles is a requirement to:

“Take account of and support local strategies to improve health, social, and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.”

Paragraph 70 states:

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses, and places of worship) and other local services to enhance the sustainability of communities and residential environments...*
- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

The population of the proposed development will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. Sport England will therefore seek to ensure that the proposal meets any new sports facility needs arising as a result of the development.

You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. Details can be found at:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/sports-facility-calculator/>

Any new facilities should be built in accordance with Sport England's design guidance notes, copies of which can be found at:



**SPORT
ENGLAND**

Creating a sporting habit for life

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Sport England expects any forthcoming application for planning permission to demonstrate how the above requirements of the NPPF will be met. This should be clearly set out in an environmental assessment or within other documents submitted formally as part of the application (e.g. Design and Access Statement, Planning Statement etc.)

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely

A handwritten signature in black ink that reads "Vicky Aston".

Vicky Aston
Planning Manager

Tel: 020 7273 1912
Email: Vicky.Aston@sportengland.org

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Jeremy Davy

Sent: 25 July 2014 18:14

To: Jake Brown

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Dear Jake,

My comments are as follows:-

1. Figure 2: Planning Application Site does not seem to match the supplied indicative concept plan in that part of area 3A is not within the planning application boundary.
2. I am content with the Biodiversity section.
3. I am concerned that the Water Resources section does not seem to cover the possible effects of the development on the springs and wet grassland mentioned in Biodiversity section. To maintain the ecological value of the streams and wet grassland areas it is important that the springs continue to operate as at present. Therefore the ES should cover potential impacts on these features of the site and show how they are to be safeguarded.
4. I may be missing something (it is late on Friday) but Appendix 1 indicates the documents to be submitted. While the ES Non Technical Summary is listed, the ES itself is not?

Kind Regards

Jeremy

Jeremy Davy | Principal Ecologist

West Berkshire Council

Planning & Countryside, Council Offices, Market Street, Newbury, RG14 5LD

t | 01635 519682 m | 07785 356988 f | 01635 519408 e | jdavy@westberks.gov.uk

www.westberks.gov.uk/index.aspx?articleid=3234



Please consider the environment before printing this e-mail

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Alex Godden

Sent: 16 July 2014 10:56

To: Jake Brown

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Hi Jake,

Many thanks for sending this over; looking through the EIA scoping report I'm glad to see that archaeological investigation will take place before any development, although this could be subject to further discussion dependant on location/scale etc. I'm also pleased to see that the existing Conservation Assessment will be expanded – I'm assuming that this is referring to the Conservation Audit that was produced by Asset Heritage Consulting in 2012? This expansion should include non-designated heritage assets, previous investigations etc – all of which can be obtained from our Historic Environment Record. I would also like to be added to list of consultees mentioned in Paragraph 4.13

Generally, the scope of the proposed EIA (as regards cultural heritage) is fine.

All the best

Alex

Alex Godden

Archaeological Officer

Cultural & Environmental Protection

West Berkshire Council Market Street Newbury RG14 5LD

(01635) 519534 Ext 2534 agodden@westberks.gov.uk

www.westberks.gov.uk/archaeology

Jake Brown

From: Debra Inston
Sent: 17 July 2014 09:24
To: Jake Brown
Subject: 14/01456/SCOPE - Sandleford Park

Hi Jake,

I welcome the expansion of the current Conservation Assessment, this should cover the proposal's impact on the setting of non designated, as well as designated heritage assets. Within this section cross reference should also be made to the Landscape and Visual Assessment section of the ES.

Thanks,

Debra Inston (née Hammond) | Principal Conservation and Design Officer

West Berkshire Council
Planning & Countryside, Council Offices, Market Street, Newbury, RG14 5LD
t| 01635 519111 f| 01635 519408 e| dhammond@westberks.gov.uk
www.westberks.gov.uk/planning

Please note my normal working days are Tuesday, Wednesday and Thursday.

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Stuart Clark
Sent: 14 July 2014 14:33
To: Jake Brown
Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Dear Jake,

Although an EIA for a development does not directly involve sustainable drainage measures, we are happy to put forward our basic SuDS requirements for consideration as there may be scope to include this information into parts of the EIA.

Essentially, the site should be self contained in terms of its surface water drainage and all surface water runoff should therefore be dealt with on the site so that there is no off-site discharge. To quote paragraph 1.1 of CIRIA C697 The SuDS Manual, "SuDS objectives are, therefore, to minimise the impacts from the development on the quantity and quality of the runoff, and maximise amenity and biodiversity opportunities" and this should be the overriding philosophy for surface water drainage.

We will require that this is achieved with a good range of SuDS treatments including but not limited to storage ponds, swales and filtration devices (filtration strips, permeable paving and soakaways). The measures shall form a SuDS treatment train in accordance with The SuDS Manual and the new National Standards if appropriate at the time of the initial planning submission. A draft SuDS scheme shall be submitted as a basis for discussion with West Berkshire Council before the site layout is finalised to ensure that good SuDS measures can be accommodated within the site and not squeezed in as an afterthought.

Regards, Stuart

Stuart Clark Principal Engineer
West Berkshire Council

Highways & Transport | Council Offices | Market Street | Newbury | Berkshire | RG14 5LD
Tel : 01635 519857 | Fax : 01635 519637

 Please consider the environment before printing this e-mail

Jake Brown

From: Suzanne McLaughlin
Sent: 23 July 2014 11:36
To: Jake Brown
Subject: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandford Park, Newtown Road, Newtown, Newbury.

Jake

Our ref. 14/02400/EP_I

I have reviewed the proposal and agree with the areas to be considered which have an Environmental Health implication regarding contaminated land, air quality and also construction management.

Regarding the proposal for noise I advise that the scope is not sufficient in that the effect of noise from existing noise sources other than road traffic has not been listed as being to be assessed. For example the layout shows new residential receptors are in close proximity to the existing Newtown Road Household Waste and Recycling Centre. The EIA for noise should include this noise source. Also the noise impact from any new part of the development will need to be suitably assessed, for example the energy centre.

Regards

Suzanne

Suzanne McLaughlin
Acting Principal Environmental Health Officer
Environmental Quality | West Berkshire and Wokingham Environmental Health and Licensing
Market Street Newbury RG14 5LD
(01635) 519851 | extn 2851 | Fax (01635) 519172 smclaughlin@westberks.gov.uk
www.westberks.gov.uk

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Jackie Ward

Sent: 24 July 2014 15:24

To: Jake Brown

Cc: Jenny Lyons

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Dear Jake

Waste Management has no comments at this stage

Thank you

Jackie Ward
Waste Manager

Culture & Environmental Protection, West Berkshire Council, Market Street, Newbury RG14 5LD
(01635) 519216 | jward@westberks.gov.uk
www.westberks.gov.uk/waste

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.
Attachments: 140606 Ltr WBC EIA Scoping.pdf; Sandleford Framework Plans.pdf; 140613 Sandleford Park ES Scoping Report - RE.pdf

From: Elaine L Cox
Sent: 01 August 2014 15:53
To: Jake Brown
Cc: Stewart Souden
Subject: Fw: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Jake

I note that the proposal is for public rights of way not be to included as a specific category in the EIA. I am comfortable with this providing the impact on the existing right of way through the site is adequately covered in the Landscape and Visual Assessment chapter.

My view is that the main impact on this right of way will be as a result of the potential for 'urbanizing' its present rural setting views. I would wish to see this impact taken very seriously, especially in view of the high value of the present landscape which has already been described in this document.

The main aspects I would like to see addressed would be:

1. Reducing the impact on the rural setting and rural views.
2. Reducing the noise levels for those using the right of way.
3. Retention of as much of the 'rural' nature of the right of way itself as possible.
4. Minimal use of nighttime external lighting in the development and especially in the area around the right of way.
5. The provision of pedestrian (and cycle ?) links to Greenham Common from the development area.

Public rights of way are also linked closely to Open Space and Transport considerations, and I would therefore like to be consulted on the Landscape, Open Space and Transport aspects of the EIA.

Thanks

Elaine Cox
Senior Rights of Way Officer
Planning and Countryside, West Berkshire District Council, Council Offices, Market Street, RG14 5LD
(01635) 519069 | Ext. 2069 | elcox@westberks.gov.uk | www.westberks.gov.uk

Jake Brown

From: Simon Robert [Simon.Robert@thameswater.co.uk]
Sent: 28 July 2014 14:18
To: Planapps; Mark Dickinson
Cc: Devcon Team
Subject: Ref: 14/014562/SCOPE-Name: West Berkshire - Scoping Opinion - Sandford Park Newtown Road Newtown Newbury Berkshire

Dear Mr. Brown,

Thank you for giving Thames Water the opportunity to comment on the above document. The provision of water and waste water infrastructure is essential to any development.

It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of the proposed development. Thames Water has serious concerns regarding the network in this area and that it may not be able to support the demand anticipated from this development. The developer needs to consider the net increase in water and waste water demand to serve the development and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.

It is also unclear as to how the development will be constructed, Thames water is concerned that sewers immediately adjacent to the site may be affected by vibration as a result of piling, possibly leading to water main bursts and or sewer collapses.

We would therefore recommend that any EIA report should be expanded to consider the following.

- The developments demand for water supply and network infrastructure both on and off site and can it be met.
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met.
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.
- Any piling methodology and will it adversely affect neighbouring utility services.
- There are gravity sewers and distribution mains located within the development site area. The proposed EIA should include information on how these assets will be protected during construction, and also as a result of any vehicle movement within and accessing the site.

Should the developer wish to obtain information on the above issues they should contact our Developer Services department on 0845 850 2777

Yours Sincerely

Mark Dickinson
Development Planning Manager

http://corporate/dts/Pn_DevPlan/DevPlanDetails.asp?selDevPlan=3334

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We provide the essential service that's at the heart of daily life.



President: Lady Wroughton

Jake Brown
Senior Planning Officer
West Berkshire Council

Thursday 24th July, 2014

Dear

14/01456/SCOPE: SCOPING OPINION, Sandleford Park, Newbury

I am writing on behalf of the Berkshire Gardens Trust (BGT) in response to the consultation inviting views on the content and scope of heritage matters in the Environmental Statement relating to this outline application, as set out in the Environmental Impact Assessment's Scoping Report prepared by Boyer Planning, dated June 2014, which contains references to a Landscape and Visual Impact Assessment (LVIA) and includes a Cultural Heritage assessment. Our response is also on behalf of the Garden History Society in its role as a statutory consultee on heritage assets such as Sandleford Priory, a Grade II Registered Park and Garden which fall outside English Heritage's remit to comment on Grade I and II* heritage assets.

Sandleford Park has acknowledged connections with Capability Brown, whose tercentenary is being celebrated in 2016 and will therefore feature in BGT's programme of events celebrating this within Berkshire. Although the site covered by the outline application is not within the Grade II registered Park, it is part of the heritage landscape setting to the Grade I listed Sandleford Park. BGT is therefore concerned that both the proposed country park and potentially the development could impact adversely on the value and significance of the setting of the registered park and/or the parkland setting of the listed building. The parameters set out for a mixed use development within West Berkshire's Core Policy 3 of the 2012 Local Plan are therefore of particular relevance to the LVIA and especially:

- *Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and the setting of the former Sandleford Priory;*
- *A network of green infrastructure to be provided which will provide a country park or equivalent area of public open space in the southern part of the site; and respect the landscape significance of the site on the A339 approach road into Newbury.*

23, St. James Close, Pangbourne, Berkshire RG8 7AP
www.berks-gardens-trust-org.uk (0118 984 3504)

Other policies to be considered in respect to landscape, visual and historic landscape matters are:

- CS14: Design Principles; and
- CS19: Historic Environment and Landscape Character.

BGT agrees with the scope for the Cultural Heritage section in Part 4 of the Boyer Scoping Report and would like to stress the importance of the following:

- i) The landscape and visual impacts of the development as a whole on the heritage assets must be considered;
- ii) Given the status of the historic park and building, the Cultural Heritage Assessment should consider any cumulative effects, with the scope of the developments to be considered under cumulative impact assessment agreed with West Berkshire Council (WBC);
- iii) The applicant should consult with both English Heritage at a national level and the Garden History Society/Berkshire Gardens Trust at a regional and local level;
- iv) Opportunities should be sought to provide additional benefits to the historic landscape over and above mitigation measures;
- v) It is important that “private viewpoints” should also be included in the visual assessment referred to in Boyer paragraph 4.27, so that views from Sandleford Priory (currently private school grounds) and the kitchen garden (ownership not known) are assessed properly;
- vi) Consultation with WBC’s conservation advisers should be a continuous process throughout the development of the Environmental Impact Assessment and consideration of the application;
- vii) Figure 3 on page 8 of the Boyer Report should include the historic environment;
- viii) Paragraph 4.11 of the Boyer Report should include the setting of the historic park and garden;
- ix) Paragraphs 4.18/4.19 of the Boyer Report should reflect the fact that the eastern boundary is only defined in part by the A339 and the boundary with the kitchen garden is important;
- x) In the interests of conserving and enhancing the parkland setting, its condition as referred to in Paragraph 4.20 of the Boyer Report should be considered as part of the Cultural Heritage Assessment and inform the design and management of the Country Park;
- xi) The Cultural Heritage Assessment should inform the LVIA and landscape design and vice-versa.

With kind regards,

FIONA HOPE

Executive Secretary (*These comments were submitted by email on 24th July 2014*).

23, St. James Close, Pangbourne, Berkshire RG8 7AP
www.berks-gardens-trust-org.uk (0118 984 3504)

WEST BERKSHIRE COUNCIL

14/01456/SCOPE: SCOPING OPINION: LANDSCAPE AND VISUAL

SANDLEFORD PARK, NEWBURY UP TO 2000 DWELLINGS; A LOCAL CENTRE; COUNTRY PARK AND OTHER OPEN SPACE AND GREEN INFRASTRUCTURE; AND ACCESS ONTO MONKS ROAD

A. Introduction

In accordance with Regulation 13 (4), this consultation is in response to a request for advice on the content and scope of landscape and visual matters in the Environmental Statement. The application is in outline with all matters reserved except access. The application will be supported by parameter plans covering land use and access; density; and green infrastructure and accompanied by a building heights plan.

The Scoping Report prepared by Boyer Planning June 2014 sets out the proposed scope of the ES which will include a Landscape and Visual Impact Assessment (LVIA).

B. Relevant Policy

Policy C3 sets out the parameters for a mixed use development of which the following are of particular relevance to the Landscape and Visual Impact Assessment:

- *Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandleford Priory;*
- *A network of green infrastructure to be provided which will:*
 - *conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland;*
 - *mitigate the increased recreational pressure on nearby sensitive wildlife sites, secure strategic biodiversity enhancements;*
 - *provide a country park or equivalent area of public open space in the southern part of the site; and respect the landscape significance of the site on the A339 approach road into Newbury.*

Other policy to be considered in respect to landscape, visual and historic landscape matters are:

- ADPP2 Environment:
- The appearance of key gateways to the town will be improved providing an enhanced identity for the town.

- CS14: Design Principles

- CS16: Flooding: On all development sites, surface water will be managed in a sustainable manner through the implementation of Sustainable Drainage Methods (SuDS) in accordance with best practice and the proposed national standards and to provide attenuation to greenfield run-off rates and volumes, for all new development and re-development and provide other benefits where possible such as water quality, biodiversity and amenity.

- CS18: Green Infrastructure

- CS19: Historic Environment and Landscape Character

C. Scope and Content

It is agreed that the Landscape and Visual Impact Assessment (LVIA) should be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition 2013 published by the Landscape Institute and iema. In general the scope set out in the Boyer Scoping Report is agreed with the following requirements:

1. Landscape and visual impacts must be considered separately as proposed.
2. The LVIA should clearly identify the sensitivity of the landscape and visual receptors; the magnitude of change, the significance of the effect and those effects considered 'significant' under the terms of the Circular. This should be set out in a methodology which clearly explains the proposed definition of the levels of sensitivity, magnitude of change and significance.
3. Assessment of the landscape impact on overall character of the site and the adjacent landscape, as well as the landscape elements and national, county and district character areas;
4. The LVIA should consider any cumulative effects. The scope of the developments to be considered under cumulative impact should be agreed with West Berkshire Council.
5. The applicant should consult with Natural England. The development will also affect the historic landscape and both English Heritage at a national level and the Garden History Society and Berkshire Gardens Trust at the regional/local level should also be consulted.

6. Landscape mitigation should be integral to the whole design and planning process (GLVIA para 4.21 to 4.42).
7. The LVIA should include a description of all the elements of the development which may have a landscape or visual impact including mitigation measures such as noise attenuation and flood attenuation, together with a full description and plan of the proposed landscape mitigation measures.
8. The LVIA should be incorporated into the iterative design process to ensure that adverse landscape and visual impacts are avoided or reduced through the built form and layout design process and that the landscape strategy and Green Infrastructure proposals inform and are fully integrated with the development proposals in all its aspects (GLVIA para 4.5 to 4.10).
9. Opportunities should be sought to provide additional landscape and visual benefits over and above mitigation measures.
10. Assessment at years 1 and 20 is agreed.
11. Private viewpoints should **not** be excluded from the assessment (Boyer para 4.27). It is important that views from Sandleford Priory (private school grounds); other adjacent education establishments; property on Monks Lane; the Rugby Club; the kitchen garden (ownership not known); and property in Wash Common are properly assessed. The design of the built form and the landscape strategy and treatment will be in part determined by the visual impact of the development on these private receptors. Representative viewpoints (combining residential property) should be agreed with the Council and permission sought with the owners where it is necessary to have access to private land (see GLVIA paras. 6.17 and 6.36). This would not be a 'residential amenity assessment' but to inform the mitigation requirements and the design process.
12. Consultation with the Council's landscape advisors should be a continuous process through the development of the ES and consideration of the application, not just in the first instance (Boyer para 4.29).
13. The LVIA should address the implications of the proposed highway access design.
14. The LVIA should include an assessment of the potential indirect impact on the AONB;
15. The LVIA should be supported by, but not restricted to, the following:
 - Topography plan
 - Site vegetation plan cross referenced to the ecology and arboricultural baseline information

- Computer generated ZVI with main woodland blocks and built form plotted (radius from the site to be agreed with the Council) for baseline conditions, development built form in Year 1 and in Year 20 using target points (heights) as proposed
- Landscape character analysis of the proposed development parcels and country park
- Analysis of the parkland setting to Sandlesford Park
- Key representative viewpoints, to be agreed with West Berkshire Council;
- Viewpoint photographs at A3, both panoramic and single shot, and as baseline for photomontages
- Photomontages from key viewpoints to be agreed with West Berkshire Council
- Photomontages at the correct viewing distance on A3 with a field of view of 100 degrees (SNH 2006 Appendix C).

Additional notes on the Boyer Scoping Report

1. Figure 3 does not include the historic environment
2. Para 4.11: should include the setting of the historic park and garden
3. Paras 4.18/4.19: The description of the boundaries of the planning application site is not accurate and should be revised and presented in more detail. For example the land uses to the west are not all relating to the urban area; the river Enborne is an important boundary to the south; the eastern boundary is only defined by the A339 in part and the boundary with the kitchen garden is important.
4. Para 4.20: the condition of the parkland setting should be considered as part of the Heritage assessment and the LVIA and inform the design and management of the Country Park in the interests of conserving and enhancing the parkland setting.
5. Water resource, ecology, noise and heritage topics should inform the LVIA and landscape design, and vice-versa.
6. Appendix 1 refers to topics within the ES Non-Technical Summary. I assume that the ES will also include full reports on these topics.
7. The SPD requires the masterplan to create a sense of identity through the creation of character areas. The LVIA should demonstrate how the landscape and visual aspects have contributed to the definition of character areas and how this contributes to the landscape mitigation of the development.

Source baseline documents

West Berkshire SPD 2013 and supporting studies/reports
Berkshire Landscape Character Assessment 2003
Newbury District Wide Landscape Character Assessment 1993
Historic Landscape Character Study
Newbury Landscape Sensitivity Report and its GIS database 2009
GLVIA 2013
Landscape Character Assessment guidance 2002
Photography and photomontage in landscape and visual assessment Landscape
Institute Advice note 01/11

Full application on part of the site

The above requirements still apply if a full application is submitted at the same time as the outline. The greater level of detailed design would require the assessment of specific design proposals and evidence that the LVIA has contributed to the design evolution.

EIA SCOPING Request: 14/01456/SCOPE - SANDLEFORD PARK

Greenham Parish Council has the following comments on the Sandleford Park Scoping Report.

2.1 Education, Community uses and Public open spaces are mentioned but there is no mention of Doctor/Dental Surgeries. Falkland Surgery is in close proximity to the application site but it is already operating at, or beyond, capacity. A wait of 10 -12 days for a routine doctor's appointment is normal and it is difficult to see how the practice could be easily expanded to cater for the additional needs. Apart for the surgery itself, parking is wholly inadequate and the adjacent chemist is similarly overwhelmed at busy times. The plans sent out are difficult to read as the colours used are confusing and not clear. Two hectares are allowed for the Primary School but its location is not shown clearly.

2.2 Family housing is mentioned as is 40% affordable and the density is noted to be 30 – 50 houses per hectare. This raises the question of parking as we already know the problems at the Racecourse with insufficient parking which GPC pointed out at the planning stage. GPC's fears were ignored and we now find that the developer is trying to increase parking provision for both residents and visitors. The same mistake must not be allowed to happen again. CS3 refers to 2 access points off Monks Lane and the sustainable transport link via Warren Road to Andover Road. But see comments below under 2.9.

2.9 The Report says there are no major access points into the site although access is possible by Warren Road and an agricultural access from the A339. GPC is concerned about any access being provided from Warren Road, particularly because of its nearness to the Monks Lane/Andover Road junction and any access from the A339. The plans show two proposed main access points on Monks Lane which may be adequate and there is mention of access from Warren road to be for busses, cyclists and pedestrians. The whole question of access seems to be superficial and ill thought out.

4.60 There is mention of 'the wastewater treatment plant'. What is the location of this plant?

4.62 It says that the development will increase the population of 'Newbury' but there is no mention of Greenham anywhere. Does the author of the report not realise that there are two separate Parishes involved, and that the major part of the Sandleford site lies in Greenham?

4.68 Similarly it is stated that there is a plan to consult with WBC and Newbury Town Council. There is no mention in the entire documentation of Greenham at all. It must be understood that Newbury Town is a Parish and that Greenham Parish has equal status. It is essential that Greenham Parish Council is part of the consultation as the majority of the development is within the Parish.

Anywhere

There seems to be little or no recognition of the current development at Newbury Racecourse. Greenham Parish Council has previously drawn attention to the folly of placing 2 major developments so close to each other without making adequate provision for all necessary services. The cumulative effect of both developments must be taken into account.

General Environmental Concerns

The site has been undisturbed for a considerable length of time and there are likely to be issues with protected species. The area is known to be a habitat for Great Crested Newts and a recent planning application by Newbury College revealed the presence of Red List endangered birds within the site. GPC expects wildlife issues to be pursued as vigorously at the site as they have been at the Control Tower, and similar safeguards demanded of the developer.

COUNTRYSIDE / OPEN SPACE

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Stewart Souden

Sent: 22 July 2014 10:00

To: Jake Brown

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Thanks

I have no comments at this stage.

Rdgs Stewart

NEWTOWN PARISH COUNCIL

Clerk: Mrs K Summers
Newtown Grange, Newtown Common, Newbury, Berks RG20 9DB
Telephone: 01635 42064
Email: clerk@newtown-pc.org.uk

Your ref: 14/01978/OOBC

Gregg Chapman
Basingstoke & Deane Borough Council
Civic Offices
London road
Basingstoke
Hants
RG21 4AH

20th July 2014

Dear Mr Chapman,

Location: Sandleford Park, Newtown Road, Newbury, Berkshire
Proposal: Request for scoping opinion for an Environmental Impact Assessment for residential development of site

Thank you for the invitation to contribute to your consultation response to West Berkshire council on the above mentioned planning application. Newtown Parish Council wishes to make the following comments on behalf of Newtown residents.

1. Firstly, issues arising from the additional traffic which will be created, 2,000 additional homes are likely to give rise to between 2,000 and 3,000 additional cars.

a) B4640

Since the Newbury bypass (A34) was opened, a rat run has developed along the B4640 for vehicles accessing the A34, particularly for those heading south.

On page 17 (section 66) of the Sandleford Park Supplementary Planning Document under "Access" and "The Highway Network" reference is made to the fact that the western end of Monks Lane leads to the Andover Road which gives access north east to Newbury town centre and gives access south west to the A34 and Andover. However when discussing the eastern end of Monks Lane (page 18, section 68) which connects to the A339 it mentions that this gives access to the north to the town centre and south to Basingstoke and the M3. What it neglects to mention is that heading south on the A339 also gives you access to the A34 via the B4640. In fact from both of the proposed Monks Lane access points to the A34 junction at Tot Hill it is a shorter distance to travel via the A339 and B4640 than it is to travel on the A343 and one junction of the A34. In addition the 50mph speed limit on the B4640 is a more attractive option to motorists than the mainly 30mph and 40mph on the Andover road. For traffic heading south on the A34 it makes little sense to travel via the Andover road. This will be further compounded if, as is mentioned in the draft, a further access point to the development is created on the A339 itself.

We would like to see an Environmental Impact Assessment on the B4640 based on both the Monks Lane Access option and the Monks Lane plus the A339 option.

b) A339

At peak times there is already traffic queuing on the A339 and blocking the roundabout in order to access Newbury Retail Park and Tesco superstore. Again at peak times there is traffic queuing on the A339 in order to access the household waste recycling centre (HWRC). The impact of 2000 homes with very likely between 2000 and 3000 cars will greatly exacerbate this problem.

We would like to see an environmental impact assessment on the A339 at both these points at peak usage times.

c) Car parking

Car parking congestion in Newbury Retail Park and the Tesco superstore is already quite severe at peak times. We would like to see an Environmental Impact Assessment on the effect of an additional 2000 households in this area.

2. Secondly, an issue arising from the development itself.

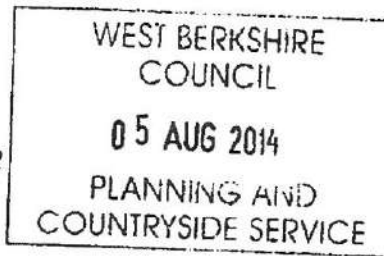
Newtown lies opposite the Sandford Park development site on the other side of the Enborne valley. We are aware that there has been some assessment of the visual effect on the landscape however the infrastructure to support 2000 new homes will obviously require night time street lighting. We would like to see an Environmental Impact Assessment on the light pollution which will be generated by this development and which will be visible from Newtown.

Yours sincerely,

Kathy Summers
Clerk



*Basingstoke
and Deane*



Basingstoke and Deane Borough Council
Civic Offices London Road
Basingstoke Hampshire RG21 4AH
Telephone 01256 844844
DX Address DX3008 Basingstoke
Facsimile 01256 845200
www.basingstoke.gov.uk

REF:14/01978/OOBC

Mr J Brown
West Berkshire Council
Market Street
Newbury
RG14 5LD

CONSULTATION RESPONSE

Town & Country Planning Act 1990

Proposal: Request for scoping opinion for an Environmental Impact Assessment for residential development of site
Case Officer - Jake Brown
14/01456/SCOPE
Please note the decision on this application is made by West Berkshire Council

Location Sandford Park Newtown Road Newtown Newbury Berkshire

Applicant: Mr O Jones

Reference your consultation which was received on 7 July 2014, Basingstoke & Deane Borough Council has now considered the application and **NO OBJECTION IS RAISED**.

Planning and Development Manager

Date: 30 July 2014



INVESTOR IN PEOPLE

Chief Executive Tony Curtis
Director of Borough Council Services and Returning Officer Karen Brimacombe
Director of Governance and Commissioning Laura Taylor

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Mel Brain

Sent: 15 July 2014 13:07

To: Maureen Sheridan

Cc: Cathy Dodson

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Hi Maureen

I don't have any comments on the scoping document, Our interest would be the 'human beings' section and they have stated that they will consult with social services, providers of such services and housing providers. We could offer to provide them with contact details of people to carry out the consultation with, but as a scoping document, I think they have covered what they need to from our perspective.

Thanks

Mel.

Mel Brain

Service Manager - Housing Strategy & Operations

Care Commissioning, Housing & Safeguarding, West Berkshire Council West Street Newbury RG14 1BZ(01635) 519403 | Ext 2403 | mbrain@westberks.gov.uk

www.westberks.gov.uk

Please note that I finish at 2.30 on Wednesdays



Please consider the environment before printing this e-mail

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.
Attachments: Accessible London 2014 SPG Draft march low res .pdf

From: Valerie Witton
Sent: 10 July 2014 09:57
To: Jake Brown
Cc: Roger Paine
Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Hi Jake,

I would like for this development to show due regard for the Lifetime homes standards and wheelchair standards for homes.

The added increased statistics and forecasts are there for our aging population and the very complex needs of young people and their families, who have the right to an inclusive life.

Access to open spaces and some accessible play equipment play areas will be very important - as will be the routes to town which will support those using mobility scooters - safely!

We have Castle School sixth, college based SEN occupation and privately run services on the boundary of this development.

We have a third higher number of Autistic Spectrum Disorders diagnosed in Berkshire than the national average (Autism Society stats) and park areas will become very important for this group. I would like to think this development would come part way at least to creating an inclusive housing development. I believe it is very wrong of us to be using only the social housing % as our accessible % as many of those who would benefit from this 'choice based' living - and often do not qualify for social housing.

We missed the opportunity to make a significant change with the Racecourse, I'd like to think we can make a bigger impact this time?

I'm sure you will have seen this and have very little time to read it - but it is something I would like to open up elected members minds to.

We are not London, but we are the same population and aged housing stock as any borough.

Off my soap box now :))

Bet you're sorry you asked.

Kind regards

Valerie

Valerie Witton
Access Officer

Planning and Countryside. West Berkshire Council, Market Street Newbury RG14 5LD
(01635) 519489 : Ext 2489 : vwitton@westberks.gov.uk



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Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Emmanuelle Brooks

Sent: 25 July 2014 15:35

To: Jake Brown

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Dear Jake,

Please see below the comments that Mark Lewis (Education) has forwarded onto me:

1. 2.2 – I am not happy with the statement 'provision of a new primary school on site' when we're discussing the requirement for more than one primary school;
2. 6.14 – how will this affect our primary school site(s) and construction of new school(s)? Will the housing development planning application address the issues surrounding mineral safeguarding for all areas of the site, including the school site(s)? Also, if potential mineral extraction is identified I assume the applicant will also deal with this in respect of the school site(s)?

Kind regards,

Emmanuelle

Jake Brown

Subject: FW: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

From: Matt Meldrum

Sent: 08 August 2014 09:05

To: Jake Brown

Subject: RE: Consultation for EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

Jake,

Apologies for the delay in responding, I can confirm that the only issue identified by the minerals and waste planning team relates to the application site being underlain by safeguarded mineral reserves (policies 1 and 2 of the Replacement Minerals Local Plan for Berkshire). The submitted scoping report acknowledges the need for these matters to be considered as part of any application which may be forthcoming (para 6.14). The Minerals and waste team are satisfied that the proposed solution, as set out in para 6.14, is an acceptable way for these matter to be addressed as this proposal is developed.

It is clear that the issue of mineral safeguarding and potential prior extraction is a matter that the developer will need to address in the near future, prior to the production of the ES, therefore if the developer would like to discuss the content / remit / approach to be pursued in respect of this matter then please pass on my contact details.

Kind regards

Matt

Matt Meldrum

Principal Minerals and Waste Planning Officer

Planning and Countryside Service, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD
(01635) 519157 | Ext 2157 | Fax: 01635 519408 | mmeldrum@westberks.gov.uk | www.westberks.gov.uk

M E M O R A N D U M

To: Jake Brown
Senior Planning Officer

Our Ref: 14/01456/SCOPE

From: Jenny Graham - Transport
Policy Team Leader
Paul Goddard – Highways
Development Control Team
Leader

Your Ref: 14/01456/SCOPE

Extn: 2623

Date: 13th August 2014

EIA Scoping Request 14/01456/SCOPE - Sandleford Park, Newtown Road, Newtown, Newbury.

1. This note covers the consideration of the Scoping Report in relation to the proposed development at Sandleford Park from a transport point of view.
2. The main considerations are highlighted and there will be the need for further discussions in relation to the details that will need to be included in the Transport Assessment. These details will be considered through the separate TA scoping report.

Options

3. The applicant is seeking the LPA's opinion of the scope of any alternative assessment that might be required (para 2.23 of the Scoping Report). The Sandleford Park SPD sets out options for access to the site in its section on Access and Movement on page 38 of the document.
4. The options that the SPD sets out should be explored in addition to the two accesses off Monks Lane are:
 - An all vehicle access onto the A339 close to the Household Waste Recycling Centre
 - An all vehicle access link through Warren Road
5. The Environmental Statement should reflect the SPD and assess these options for access arrangements. Much of the detail in relation to this is likely to be included in the Transport Assessment that accompanies the application.

Environmental Impact Assessment Methodology

6. The environmental effects from construction activities have been included in the scope (para 3.3). This is important from the point of view of construction traffic and their delivery routes. These activities are likely to be significant and over a build period that covers a number of years. It will be important to

consider the timing of mitigation measures and highway network improvements to adequately accommodate construction traffic.

Human Beings

7. Paragraphs 4.62 - 4.68 cover the impact that the increase in population will have on existing social and community infrastructure and services in the surrounding area.
8. When considering this the suitability of access arrangements to these uses and services should be considered when the additional travel activities from the development site are added to the existing baseline situation.
9. Of particular concern is access to out of town retail facilities and some other nearby facilities. Newbury Retail Park and the Tesco superstore are both close to the development site and are likely to be destinations that are popular with the residents of Sandford Park. These retail facilities have access arrangements and parking facilities that currently operate close to capacity at peak times and do not cope at particularly busy periods such as the lead up to Christmas. In addition, the Sainsbury's Petrol Filling Station on Andover Road has issues with access and vehicles queuing on the highway to use the facilities.
10. Whilst these issues may be outside the control of the applicant as they cannot increase parking capacity at destinations not in their ownership, they are still examples of issues that could be considered relevant under this section which looks at the impact on existing social and community infrastructure.

Transportation

11. There is additional information that could be supplied to help with the baseline information section, particularly in relation to bus services. There will also be information from the Personalised Travel Planning Project being carried out currently in the area around the development site which may be of use. This will be available late Autumn 2014.
12. *Assessment approach* - The extent of the TA, the junctions to be assessed and the forecast years will need to be agreed with the Council. It is understood that the scope for the TA is under consideration.
13. The Council's modelling tools (where appropriate) should be used to feed into the TA.
14. Para 4.83 picks up on air quality impacts of transport. This is particularly important in relation to the AQMA on the A339 and in relation to construction traffic. These are both addressed in the Air Quality section in paras 4.97 and 4.98.

15. Road Safety is an aspect that is not mentioned in the Transportation section. I would suggest that this should be included in the scope of the EIA given its serious impact on the population. Accident records will be available via the Council's road safety team.

Travel Plan

16. Appendix 1 of the scoping report includes a Travel Plan as one of the documents that will be submitted as part of the planning application. A Public Transport Strategy is stated as being included in this. The Travel Plan will be expected to include much more than this and there are details relating to the contents of the Travel Plan in Appendix 2 of the Sandlesford Park SPD.

Transport Policy and Highways Development Control
13th August 2014