



**West Berkshire Local Plan Review 2022-2039**  
**Proposed Submission Representation Form**

**Ref:**

*(For official use only)*

<b>Please complete online or return this form to:</b>	<b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>
	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Henry
Last Name:*		Courtier
Job title (where relevant):		Director
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\*Mandatory field

**Part B – Your Representation*****Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	<b>Client:</b> Friday Street Developments Ltd Clover House Western Lane Odiham Hants RG29 1TU
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Regulation 19
Policy:	Potential Allocation BRAD6, Land at Ash Grove, Bradfield Southend
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

*Please see included detailed representations.*

## 2. Soundness

*Please see the guidance notes for an explanation of what ‘soundness’ means.*

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

*Please tick all that apply:*

<b>NPPF criteria</b>	<b>Yes</b>	<b>No</b>
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area’s objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	<b>x</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>x</b>
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	<b>x</b>	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	<b>x</b>	

*Please give reasons for your answer:*

*The Plan preparation has failed to adequately consider alternative and additional sites within the village of Bradfield Southend. The arbitrary cap placed on housing allocations within the village harms the viability of local shops and services.*

## 3. Complies with the Duty to Co-operate

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

**Do you consider the Local Plan Review complies with the Duty to Co-operate?**

Yes

No

*Please give reasons for your answer:*

*Please see detailed representations.*

**4. Proposed Changes**

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

*Additional allocation of residential sites within the village of Bradfield Southend in order to better support local services. Proper consideration of BRAD6, to take account of the proposed benefits to highways safety on Cock Lane and the donation of land to Bradfield Church of England primary school, both of which are unique to the scheme. Due consideration should be made to the revised proposals for 16 units, which is demonstrated to have a minimal impact upon the AONB and character. Please see full representations for further information.*

**5. Independent Examination**

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

No

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

*To illustrate the need for an additional allocation in Bradfield Southend in light of the above.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**6. Notification of Progress of the Local Plan Review**

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	x
The publication of the report of the Inspector appointed to carry out the examination	x
The adoption of the Local Plan Review	x

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

<b>Signature</b>			<b>Date</b>	03/03/2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

# West Berkshire Local Plan Review Regulation 19 Consultation.

Land to the rear of Ash Grove, Bradfield Southend (BRAD6)

On behalf of Friday Street Developments Limited.

Date: 03 March 2023

P21-2820\_RO01\_v3

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## Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1.0	16/02/2023	LW/PA	HC	DRAFT
2.0	27/02/2023	LW/PA	HC	
3.0	03/03/2023	LW/PA	HC	FINAL



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# 1. Executive Summary

1.1. These representations make the case for consideration of an additional allocation of BRAD6 (Land at Ash Grove) within Bradfield Southend. Additional Landscape and Highways investigative works confirm that previous objections to the scheme can be suitably mitigated. The promoters support the concepts of the Plan, however differences in decision making question the overall soundness of the proposed strategy. The scheme has demonstrable and unique community benefits for the village which have been overlooked in favour of alternative sites. Benefits include:

- The donation of 0.46ha of land to Bradfield Church of England School
- Potential highway safety improvements associated with a reconfiguration of the School site to allow drop-off / pick up onsite to alleviate congestion on Cock Lane.
- Additional residents to halt the population decline and help safeguard the viability of shops and services within the village – including the school which is significantly under capacity.
- Significant improvements to the woodland landscape buffer surrounding the site.
- Retention of the paddock land to the northern part of the site.

The site remains available and deliverable and the site promoters Friday Street Developments Ltd are keen to work collaboratively with the Council to bring the site forward in the early part of the Local Plan period.

# 2. Introduction

2.1. These representations have been prepared by Pegasus Group on behalf of our client Friday Street Developments Limited in respect of land to the rear of Ash Grove, Bradfield Southend ('the site'), as enclosed at **Appendix 1** (Site Location Plan).

2.2. These representations are submitted in response to the current West Berkshire Local Plan Review Regulation 19 'Proposed Submission' consultation, which sets out the Council's proposed approach to accommodating growth across the district over the next plan period (2022–2039) and identifies a number of sites for allocation to meet these needs.

2.3. At this stage of the Local Plan Review preparation, the site is not proposed for allocation. The purpose of these representations is primarily to respond to the feedback given by the council at earlier stages of the Local Plan-making process and to reaffirm the deliverability (suitability, availability and viability) of the above site, to highlight the substantial benefits associated with the proposed scheme, and to make the case for additional housing allocations within Bradfield Southend. With consideration of this, **it is proposed that the site be included as a mixed allocation for residential (up to 16no. dwellings) and educational land (0.46ha).**



- 2.4. These representations build upon, and should be read in conjunction with, the previous representations made to West Berkshire District Council at prior stages of the Local Plan Review process as these highlight the overall benefits of the scheme. Notwithstanding this, the scheme has now evolved to be shaped by the feedback received from consultees and West Berkshire Council, and these representations highlight these changes which materially and positively impact upon the deliverability of the site.
- 2.5. The landowner is fully supportive of the broad concepts of the draft Local Plan, including the spatial strategy, settlement hierarchy and quantum of development across the district. In particular noting that proposed housing targets are not capped and will therefore allow additional flexibility in housing delivery, especially where larger allocations do not come forward as anticipated. However, it is considered that the Council has failed to adequately assess the deliverability of the site (referenced within previous submissions as BRAD6) and the significant benefits the site can provide to the community as a whole.
- 2.6. These representations are made on the basis of further works which have been undertaken to demonstrate the deliverable benefits of the scheme for the local community and to nullify previous objections to the development of the site. In addition, the revised proposals for allocation reduce quantum of development to 16 dwellings in total to balance housing delivery with the constraints of the site and now includes the addition of approximately 0.46ha of education land.
- 2.7. This revised promotion illustrates that the delivery of the site would result in substantial and unique community benefits within the village. These include, but are not limited to, **alleviated school congestion** and **improving pedestrian safety** on Cock Lane, significant **enhancement of the existing woodland buffer**, and **additional housing** to secure the ongoing viability of the school and services within the village. These are achieved alongside the retention of the paddocks and **donation of 0.46ha of adjoining land to the Primary School**. The retention of existing paddocks and donation of land to the school is enabled by the concentration of residential development to the south-eastern corner of the site, a strategy which had been endorsed by previous Landscape Capacity Assessments undertaken for the Council. The proposed allocation presents an opportunity to not only deliver the benefits outlined above but also deliver these with minimal landscape impact upon the AONB.

### 3. Previous Promotions

- 3.1. The site has previously been promoted at each stage of the Local Plan Review preparation, including first through the West Berkshire Housing Site Allocations and Delivery Development Plan Document in 2014. The site was later promoted by Bell Cornwell, firstly at the Call for Sites in 2017 and later in earlier versions of the Local Plan Review, with the most recent in early 2021, the latter of which is included in **Appendix 2**.
- 3.2. As part of the Council's assessment of individual sites, a Sustainability Appraisal was carried out for each of the submitted sites. Feedback from the Sustainability Appraisal relating to the recent Regulation 18 stage of consultations is appended to these representations (**Appendix 3**) which will be responded to in this section. Although the site has been consistently promoted at earlier consultation stages of the Local Plan Review, earlier promotions on the site included a flexible-approach with the potential for a greater

quantum of development, which, whilst flexible from the perspective of the landowner, overstated the detractions of the scheme and in turn outbalanced the potential of the site to deliver benefits due to uncertainty about how many dwellings the site could supply without unacceptable detrimental impact upon its surroundings.

- 3.3. As such, the promoters sought pre application advice in December 2021 in order to gain feedback from West Berkshire Council on the revised proposals. A pre application response was received from West Berkshire Council in March 2022 has provided additional detail and informed these representations.
- 3.4. Below is a summary of a selection of the responses to the 'Appendix 8b SA/SEA of New Residential Site Allocation Options' (included in Appendix 3) which forms part of the Council's evidence base for the draft Local Plan Review and includes a detailed assessment of each site. Positive and neutral responses contained within Appendix 8b have been omitted.

**Table 1 – Key criteria highlighted in the Sustainability Appraisal Appendix 8b (Full version included in Appendix 3).**

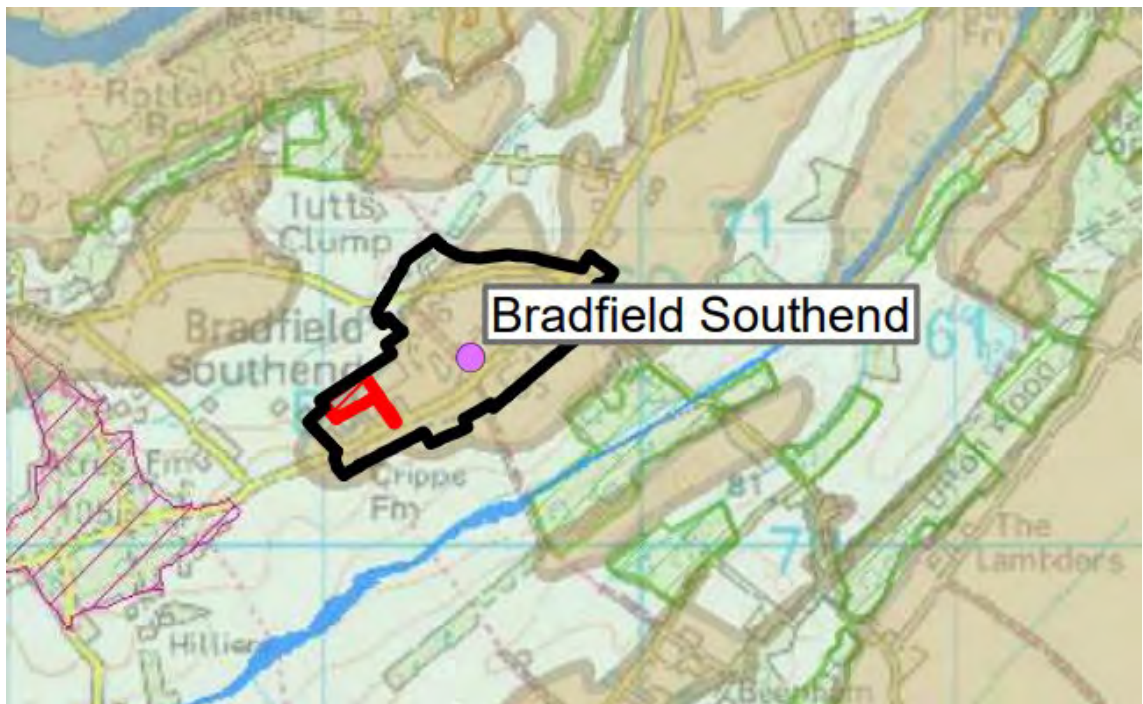
Sub-Objective Criteria	Council's view of Effects on SA Objectives	Justification Given by Council	Summary of Mitigation Considered by Council and Comment	Comment from Promotion Team
9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	?	Impact will depend on detailed design which is not yet known	Mitigation would be required	Given the nature of 'call for sites' consultations, the vast majority of submissions will not have detailed designs at this stage. Features of sustainable design and low carbon technology can be incorporated into the future development of this site.
2(c): To enable the protection and enhancement of high quality multi-functional green infrastructure across the district	?	Unknown impact on GI – dependent upon detailed design.	Mitigation would be required	The development of this site is expected to incorporate woodland buffer planting, which will enhance green infrastructure and biodiversity.
4(a): To reduce	? / -	Unknown impact on road	Site has an unknown impact	The site is within close proximity to the local

accidents and improve safety (sustainable travel)		safety Concerns relating to whether access can be achieved in a safe manner	upon sustainability in relation to safe and sustainable travel	amenities of the village. Vehicular access can be achieved which is safe and appropriate (refer to accompanying Transport Statement at Appendix 5).
4(b): To increase opportunities for walking, cycling and use of public transport	?	Limited impact upon walking/cycling, with limited bus services	Site has an unknown impact	The site location is inherently more sustainable for day-to-day amenities in the village – see Table 2.
5(b) To conserve and enhance the character of the landscape	-	Likely to have a negative impact on landscape as the site is within the AONB – part of the site may be suitable for development	Mitigation measures required to enable development	Landscape Capacity Assessments by Liz Lake show the site can be adequately mitigated to enable development without significant impact on the AONB – see Appendix 4.
5(c) To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	?	Site is likely to have unknown impact on heritage assets.	Would require investigation and mitigation.	The closest heritage asset to the site is c. 70m to the south west (Grade II Thatched Cottage) and separated from the site by existing built form. The development of this site is therefore not considered to cause harm to any heritage assets however this would be further assessed at planning application stage.
7(b) To maximise the use of previously developed land and buildings	-	Site likely to have an impact upon PDL as it is greenfield	Site likely to have a negative impact on sustainability.	There are no brownfield sites within the village boundary and so development is not possible without utilising greenfield sites.

where appropriate				
8(a): To reduce energy use and promote the development and use of sustainable/ renewable technologies, generation and storage	?	Site has an unknown impact on energy usage	Site could deliver positive impact	The promoters are committed to delivering a high-quality and sustainable scheme, which can be incorporated into the detailed design.
8(c): To reduce water consumption and promote reuse	O/?	Site unlikely to have an impact on water consumption. Concerns over wastewater capacity	Site unlikely to impact on sustainability or natural resources	Matters relating to water efficiency could be incorporated at the detailed design stage.

- 3.5. The conclusions reached by the Council at earlier stages of representations found that much of the site could not be developed without having an adverse impact upon the surrounding landscape of the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB). The landscape investigations did confirm that land to the south of a roughly horizontal line bisecting the site was developable without impact upon the surrounding landscape.
- 3.6. Detailed landscape, visual and capacity reviews were carried out by Liz Lake Associates in 2020 in response to earlier representations (**Appendix 4**). These assessments confirmed that the site has capacity for a moderate scale of development, subject to appropriate mitigation.
- 3.7. The LV&C assessment also gives a detailed overview of previous Landscape Capacity Assessments carried out for the Council. In these, the relationship of the site is considered to be acceptable and 'not considered to be a restriction on potential suitability'. In addition, the woodland boundary of the site is highlighted as a particular strength, helping to contain the site and reduce the impact upon outside views.
- 3.8. These demonstrated that part of the site could be developed with minimal impact to the surrounding landscape. Despite this, the Council neglected to allocate the site.
- 3.9. At each stage of the plan preparation, the site has been seen as undeliverable with sites in the west of the village being preferred for development as shown in Figure 1 below.

**Figure 1 – Taken from the Regulation 19 Policies Map.**



**Pre-Application March 2022**

- 3.10. A pre-application advice request was submitted in December 2021, with a response received in March 2022. This pre-application request was materially similar to the scheme, which is now being promoted, however amendments have been made to take account of Officers’ responses.

**Principle of Development**

- 3.11. Officers note two alternative sites within Bradfield Southend at Stretton Close, one of which benefits from planning consent for 11 dwellings (17/O3411/OUTMAJ) (now completed) and the second of which is proposed for allocation in the Local Plan for 20 dwellings (BRAD5). Officers are of the opinion that these two developments represent the maximum quantum of development that the village can presently handle, given its status as a Service Village. The following sections will challenge this opinion, and present material reasons to reconsider this arbitrary cap on development within the village.

**Landscape**

- 3.12. The pre-application response references the responses from Natural England received in previous representations. Namely, Officers referred to the encroachment into the AONB through ‘incongruous extension beyond the settlement’ which was not ‘in keeping with the linear pattern of development’.
- 3.13. The emerging Local Plan states that the North Wessex Downs AONB covers approximately 74% of West Berkshire – with these areas managed carefully to conserve and enhance the natural beauty. Undoubtedly this places pressure on the availability of housing land across



many of the towns and villages across the district and beyond. Indeed, Bradfield Southend is entirely encompassed within the AONB designation.

- 3.14. The Draft Policy SP2 outlines the strategy for protecting the natural beauty of the North Wessex Downs and outlines that:

***“Development in the North Wessex Downs will be required to support its local communities and rural economy in a manner commensurate with the statutory status of the AONB as a nationally valued landscape”,***

***“In determining what constitutes major development, the Council will consider whether the development, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the landscape and scenic beauty of the AONB. This will include the consideration of the individual characteristics of a proposal and its context and the impact of cumulative development”,***

- 3.15. The reduced scale of development, as a result of the condensed form towards the southern extent of the site substantially reduces any potential for impact upon the landscape and scenic beauty of the AONB.
- 3.16. The Included Landscape Visual & Capacity Review prepared by Liz Lake (**Appendix 4**) provides a detailed response to the Council’s 2015 Landscape Capacity Assessment. In Section 3.5 of the report addresses concerns raised by the Council in the 2015 Landscape Capacity Assessment and demonstrates a much reduced potential for ‘harm’ to the AONB’s qualities with mitigations.
- 3.17. The LVC review also confirms that approximately 2.1ha of the site constitutes developable area, potentially supporting up to 48 dwellings at medium density on the site. The revised representations do not seek to fully exhaust this capacity, and instead take a cautious approach to conserving the landscape character with a lesser scheme of 16 dwellings. As for the rural economy, the population of Bradfield Southend is currently stagnating which brings into question the ongoing viability of the village’s existing services and facilities. In particular the school, the public house, convenience store and Post Office. When considering the rural economy of the village it is important to note that this is not static, and services which exist now are not necessarily secured in perpetuity and requires sustainable growth in order to support the vitality and viability of the village.

### **Highways**

- 3.18. Concerns over the deliverability of an adoptable access from Ash Grove/Cock Lane were voiced, owing to doubts over sight-lines to the left (east) and conflict with the existing access to Ash Grove.
- 3.19. The amended proposals include pedestrian and vehicular access through Ash Grove and as such no conflict exists onto Cock Lane. The Transport Statement (included in **Appendix 5**) prepared by Bellamy Roberts demonstrates that safe and suitable vehicular access can be achieved onto Cock Lane via Ash Grove. This includes appropriate visibility splays which properly consider 85<sup>th</sup> percentile speeds along Cock Lane. The proposed visibility splays are also demonstrated to be suitable for 30mph speeds, meaning any reduction to 20mph, as is commonplace outside schools across the district and the country, will go over and above highways standards. The Transport Statement confirms that safe and suitable



access arrangements can be achieved for all road users, including pedestrians and vehicles, in accordance with current standards.

- 3.20. The scale of vehicular movements into and out of the site are estimated to be in the region of 5–8 vehicular movements during peak hours. Such movements can easily be accommodated within the existing road network. In addition to this, the Transport Statement concludes that there are genuine and realistic opportunities for residents and visitors to travel into and out of the site using sustainable and active modes of transport. The scope for active transport modes will be detailed further in the coming sections of these representations.

### **Restrictive Covenants**

- 3.21. The Local Plan evidence base (Strategic Housing Land Availability Assessment) identify that the site is subject to restrictive covenants which may impact upon the deliverability of the site. Whilst such covenants are linked to the land, this is not a material planning consideration and is a purely commercial matter which will be the subject of negotiations by the landowners and is something can be addressed once the planning potential of the site has been established. The covenants do not affect the deliverability of the site in planning terms, and certainly do not preclude development within the plan period.
- 3.22. Moreover, we note that a number of local sites have similar covenants and that the covenant on the local doctor's surgery has not prevented from the Council granting planning permission for two new dwellings at the site. In addition, the committee report for the relatively recent reserved matters application at Stretton Close (20/02410/RESMAJ) states, in paragraph 6.13:

***“...a number of residents believe that no utilities can be laid underground across the application site due to restrictive covenants. The presence of effect of restrictive covenants are not a planning matter but a civil matter for the developer to address”. (Emphasis added).***

- 3.23. In addition, the existing development on Ash Grove (Nos 1–5) had the same covenants in place, prior to a negotiation by Tay Homes for their removal. Therefore, such a covenant did not prevent the delivery of housing at the site.
- 3.24. The site promoter understands that the covenant holder has a number of local land and property holdings and will be familiar with normal commercial negotiations over their removal, provided the planning potential is confirmed and community benefits of any scheme fully understood.
- 3.25. The landowners remain confident that the matter of the covenants can be reasonably resolved and are committed to actively promoting the site through the Local Plan-making process. We are confident therefore that there is no justification for the council citing covenants linked to the land as a reason for ruling the site out as a site allocation.

### **Design, Character and Appearance**

- 3.26. Officers noted the reduced scale of development within the site, however referred back to the *Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the AONB (August 2015)* which identifies that the southern extents of the site hold potential for development which would not significantly impact upon the North Wessex Downs AONB.



**Figure 2 – Extract from Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the AONB (August 2015) figure BRS006.**



- 3.27. Officers also noted that the layout of the then-proposed dwellings still resulted in a significant northward extension to the village and represented a significant encroachment beyond the landscape capacity outlined in the 2015 LCA referred to above in Figure 2. These comments have been carefully considered within the revised proposals and prompted further Landscape Capacity works which are included in Appendix 4.
- 3.28. These additional LVC works undertaken by Liz Lake Associates (Dated March 2020) demonstrate that the site has capacity over and above that which was indicated by the Council's own assessments – with a potential capacity of up to 48 dwellings across part of the site. The 16 dwellings proposed for allocation represent a small portion of this potential capacity and are a cautious approach to conserving the landscape character of the AONB.

## Other Allocations within Bradfield Southend

- 3.29. The Draft Local Plan includes a single allocation within Bradfield Southend, at Land North of Southend Road (BRAD5). This scheme includes 20 dwellings within a low-density scheme accessed from Southend Road.
- 3.30. Our client supports this allocation and recognises that each is not necessarily mutually exclusive, with more than one allocation able to demonstrate additional benefits for the village as a whole.

- 3.31. However, the soundness of the selection of BRAD5 over BRAD6 is questioned in light of the differences in the way the two sites (BRAD5 and BRAD6) have been scored within the evidence base. In the SA, both sites are scored on an almost identical basis, with only very minor differences between the two. These differences amount to just 3 categories: the ability of the site to reduce accidents and improve safety; the impact upon biodiversity and geodiversity and; the ability of the site to protect, conserve and enhance the built and historic environment.
- 3.32. Notable is the way in which both sites have scored poorly against landscape impact, with both requiring mitigations in order to enable development over part of the site. Natural England" that if required/needed only one site be brought forward for allocation. Their preference would be part of BRAD5.". Reasoning for this is not substantiated, beyond the reference to the apparent landscape capacity indicated in the 2015 LCA. As previously stated, further landscape investigations undertaken by Liz Lake confirm a greater capacity for the site with appropriate mitigations and so this objection from Natural England cannot be substantiated.
- 3.33. Of particular note in the SA is the difference in assessing the potential for biodiversity and geodiversity conservation, with BRAD6 considered unlikely to have an impact upon biodiversity, benefiting from generous provision to enhance hedgerows and woodland planting, whilst BRAD5 was also assessed as unlikely to have an impact upon biodiversity in spite of the need to remove several TPO trees and hedgerows along the boundary of the site in order to gain access.
- 3.34. Despite clear differences in the sustainability of the locations of each site, the two are ranked as almost equally sustainable across the board.
- 3.35. The Transport Assessment (**Appendix 5**) confirms BRAD6 offers a realistic opportunity for future residents to use active and sustainable modes of transport for day-to-day needs within the village. To illustrate these differences, the differences in proximity to various local amenities is shown below. These clearly highlight that BRAD6 demonstrates a more sustainable location within the village when compared to a continued western expansion.
- 3.36. As shown above, each of the Village's key services are within proximity to Ash Grove, representing no more than a 5 minute walk. In contrast, BRAD5 and the continued expansion of the village to the west is concentrating housing development at a more remote distance to essential shops and services of the village. Development at BRAD6 would be closer to the functional core of the village and has a greater potential to reduce car use for day-to-day intra-village needs.
- 3.37. In addition, whilst the Transport Statement included with these representations confirms safe and appropriate access can be demonstrated to Cock Lane (via Ash Grove), there remain substantial questions over access to BRAD5, given the presence of a number of TPO trees and vegetation at the proposed access point. There also remain questions over whether access via the existing employment and small industrial estate are appropriate given the potential for conflict.

*Table 2 – Distance to local amenities within the village taken from the approximate site access. Journey times and distances taken from Google Maps.*

Local Amenity and Location	Distance (taken from the approximate site access)		Walking distance (minutes)	
	From BRAD5 (Land north of Southend Road)	From BRAD6 (Land to the rear of Ash Grove)	From BRAD5	From BRAD6
Bradfield Church of England Primary School	1.1km	<b>110m</b>	13 minutes	<b>1 minute</b>
The Queen's Head Public House	800m	<b>190m</b>	10 minutes	<b>2 minutes</b>
Bradfield Village Hall	625m	<b>350m</b>	8 minutes	<b>4 minutes</b>
Bradfield Southend Village Store & Post Office	600m	<b>375m</b>	7 minutes	<b>5 minutes</b>
Public Playing Fields	1.0km	<b>170m</b>	12 minutes	<b>2 minutes</b>

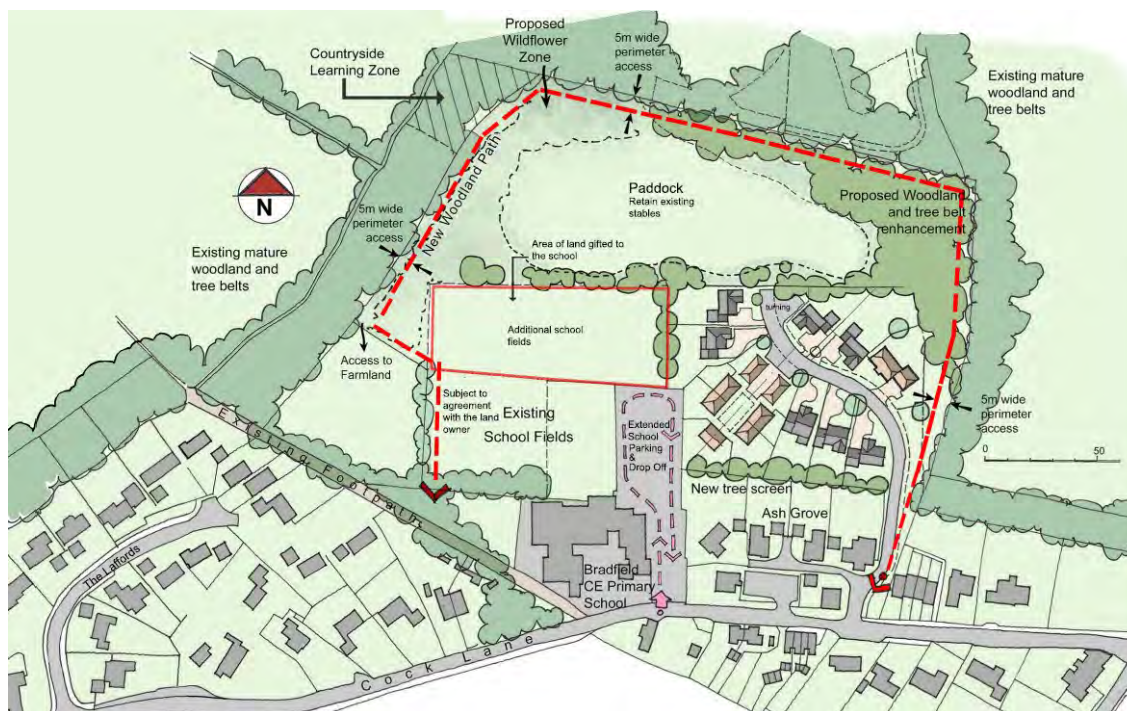
### Summary

- 3.38. Whilst promoting BRAD6 for allocation, Friday Street Developments remain supportive overall of the allocation of BRAD5. However, it should be noted that the differences in assessing the two sites do raise questions into the soundness of the selection process.

## 4. Site Proposal & Benefits

- 4.1. The proposals have been amended in response to feedback provided by the Council and the Local Plan evidence base. The proposals now consist of a small development of 16 dwellings, focused within the southern half of the site to the rear of Ash Grove. This landscape-led approach reflects the findings of the Local Plan evidence base as referred to above, directing development towards the southern part of the site where capacity exists in landscape terms to ensure the development minimises impact on the surrounding landscape and AONB and sits comfortably within and contributes positively towards the character of the area.

**Figure 3 – Extract from Proposed Master Plan (February 2023) – Available in full at Appendix 6.**



- 4.2. Other changes to the scheme include the removal of the previously included village green in response to pre-application advice advising that there exists sufficient open space provision within the village, particularly noting the extensive playing field provision towards the centre of the settlement. Whilst there was a clear aesthetic value to prospective residents, Officers questioned whether this would be considered as usable space, especially given the alternative options in the vicinity which would likely remain more attractive prospects for recreation.
- 4.3. The site promoters Friday Street Developments are keen to deliver a high quality scheme, addressing the unique local character of Bradfield Southend. Accordingly, each element of the revised indicative masterplan has been considered to address local constraints, and previous feedback received from the Council and consultees in order to present a deliverable concept for the site which is also capable of full compliance with all relevant emerging Local Plan policies, including in relation to biodiversity net gain, energy efficiency and sustainable design and construction.

### School Land

- 4.4. Forming part of this proposed allocation is **0.465 ha** of land to the north of the current Bradfield C of E Primary playing fields, which is proposed to be gifted to the school for their use. Whilst the land could be used for the school as they see fit, it is suggested a reconfiguration of the existing hardstanding areas would enable school drop off / pick up from the site and thus alleviate the current traffic problems causing highway safety concerns to Cock Lane.



- 4.5. As of November 2019, the school has approximately 159 pupils on roll<sup>1</sup>, with many of these travelling in from outside Bradfield Southend. As a result, morning and afternoon peaks associated with the school run cause congestion on Cock Lane which was not designed with this volume of traffic in mind. Cock Lane itself only has a footpath on the eastbound side, meaning parents arriving in the westbound carriageway are forced to exit directly into the road and immediately cross to the footpath opposite. The existing school site is highly constrained, with very limited opportunities for reconfiguration within the existing boundaries to combat these issues.
- 4.6. As an interim solution, to discourage use of Cock Lane, the school have put in place a remote drop off point at Bradfield Village Hall which is accessed by a 250m pedestrian path which snakes around the community football pitches. This path was funded by the Parish Council, who acknowledged safety issues on Cock Lane and recognised the need to provide safe access.
- 4.7. The interim measure has alleviated traffic to some extent; however, this measure frequently fails when weather is poor, meaning for much of the time Cock Lane remains heavily congested during the school pick-up and drop-off times.
- 4.8. Being one of the only adjoining landowners with physical connection to the school grounds, there is limited alternative land available for the school's future growth. The proposed donation of land to the school represents a significant benefit of the proposals and could enable a partial reconfiguration of the site, including a potential expansion to the vehicular turning circle to improve capacity for onsite drop-offs / pick ups. Initial productive discussions have been held with the Oxford Diocesan Board of Education (ODBE), whom are receptive to the proposals and willing to enter into detailed discussions. Their full letter of support is included in **Appendix 7**.
- 4.9. Accordingly, the gifting of land to the Primary School could assist in improving highway congestion and safety for its pupils which is a material community benefit of the proposals which can only be provided through the allocation and delivery of BRAD6 to the rear of Ash Grove. In order to secure comparable benefits through other means, the school would have to consider relocation.

### **School Viability**

- 4.10. In addition to the land donated to the school, allocating further residential developments within Bradfield Southend will increase the potential pool of pupils within the school's catchment area. Increasing the number of pupils enrolled supports the viability of the school for future and safeguards its continued operation.
- 4.11. The emerging Local Plan draft Policy SP23 states that *'New development will only be supported where infrastructure, facilities and services both on and off site, necessary to make the development acceptable, will be provided as and when appropriate. The Council will work with infrastructure providers and stakeholders to identify requirements for infrastructure provision and services for new development and will seek to co-ordinate infrastructure delivery, whilst protecting local amenities and environmental quality'*.

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<sup>1</sup> <https://files.ofsted.gov.uk/v1/file/50129447>



- 4.12. The school is able to accommodate 30 students per year in single form entry, giving a total capacity of up to 210 pupils. The most recent Ofsted reports indicate that the school currently has 159 pupils on roll, which amounts to approximately 75.7% capacity utilisation.
- 4.13. Given that the Council aims to locate housing development in areas of infrastructure and service capacity, Bradfield Southend is currently an underutilised resource. At approximately 75% capacity, the school could accommodate over 50 additional pupils without the need for substantial capital investment. In addition, increasing the number of pupils on roll will help to safeguard the continued viability of the school, especially given that new-build housing tends to attract a younger family demographic.
- 4.14. Therefore, the allocation of an additional site within Bradfield Southend will not only provide the opportunity to alleviate existing highways concerns relating to the school but will also safeguard its continued provision for current and future residents of the village as a whole.

#### **Development within Bradfield Southend**

- 4.15. As of Mid-2020, Bradfield Southend is estimated to have a population of 724<sup>2</sup>. Using the average household size of 2.4, it is estimated that there are around 300 dwellings across the village. Therefore, the proposed allocation of an additional 16 dwellings comprises an approximate increase of less than 6%.
- 4.16. Additionally, ONS Data confirms that the population of the village is stagnating and on a steady downward trajectory – declining from approximately 769 in 2016 and continuing trends seen between the 2001 and 2011 Census<sup>3</sup>.
- 4.17. Despite other developments coming forward in Bradfield Southend, the population is set to continue on a downward trajectory. The addition of 16 dwellings in a sustainable village location could provide approximately 38 additional residents who will use the school, shops and local services helping to secure their ongoing viability.
- 4.18. These benefits can be secured in addition to the those proposed for allocation at BRAD5 – which itself has the potential for 20 dwellings, or approximately 48 residents at average occupancy levels. A fully complete and occupied BRAD5 would represent a flat population when compared to the 2016 mid-year population estimates. However, this does not allow for the length of time taken to build out, over which time the village population may continue to decline.
- 4.19. Notwithstanding the above, the potential for two allocations, BRAD5 and BRAD6 would bring controlled and proportionate growth to support the viability of services within the village. The provision of one site allocation for 20 dwellings (BRAD5) should not be seen as a cap to

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<sup>2</sup> ONS Census Output Area Population estimates – South East, England (Supporting Information) – Mid 2021 SAPE23DT10i

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/censusoutputareaestimatesinthesoutheastregionofengland>

<sup>3</sup> ONS Census Output Area Population estimates – South East, England (Supporting Information) – Mid 2016 SAPE19DT10i

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/censusoutputareaestimatesinthesoutheastregionofengland>



development within the village over the plan period. The current capacity within local services such as the School, mean that it cannot be argued that a moderate population increase would cause burden upon these services – to the contrary, these allocations will enable growth to support ongoing provision. The prospect of both allocations coming forward has a greater potential than either does individually to support and enhance the vitality of the village as a whole.

#### **Woodland Buffer**

- 4.20. The proposed allocation at BRAD6 will include both retention of the existing paddocks on the northern portion of the site, but also enhance the established woodland buffer which surrounds the parcel.
- 4.21. Enhancement of this woodland belt, as outlined in the LVC (Appendix 4) will further reduce the visual impact of both the proposed development and the existing settlement from views into the village. Over time, the growth of these additional trees and hedgerows will tightly enclose the site and provide a natural edge to the northern boundary of Bradfield Southend.
- 4.22. This retention and enhancement of the woodland boundary is capable of full compliance with draft policy DM15 which states that *'Development which conserves and enhances trees, woodland and hedgerows will be supported.'*



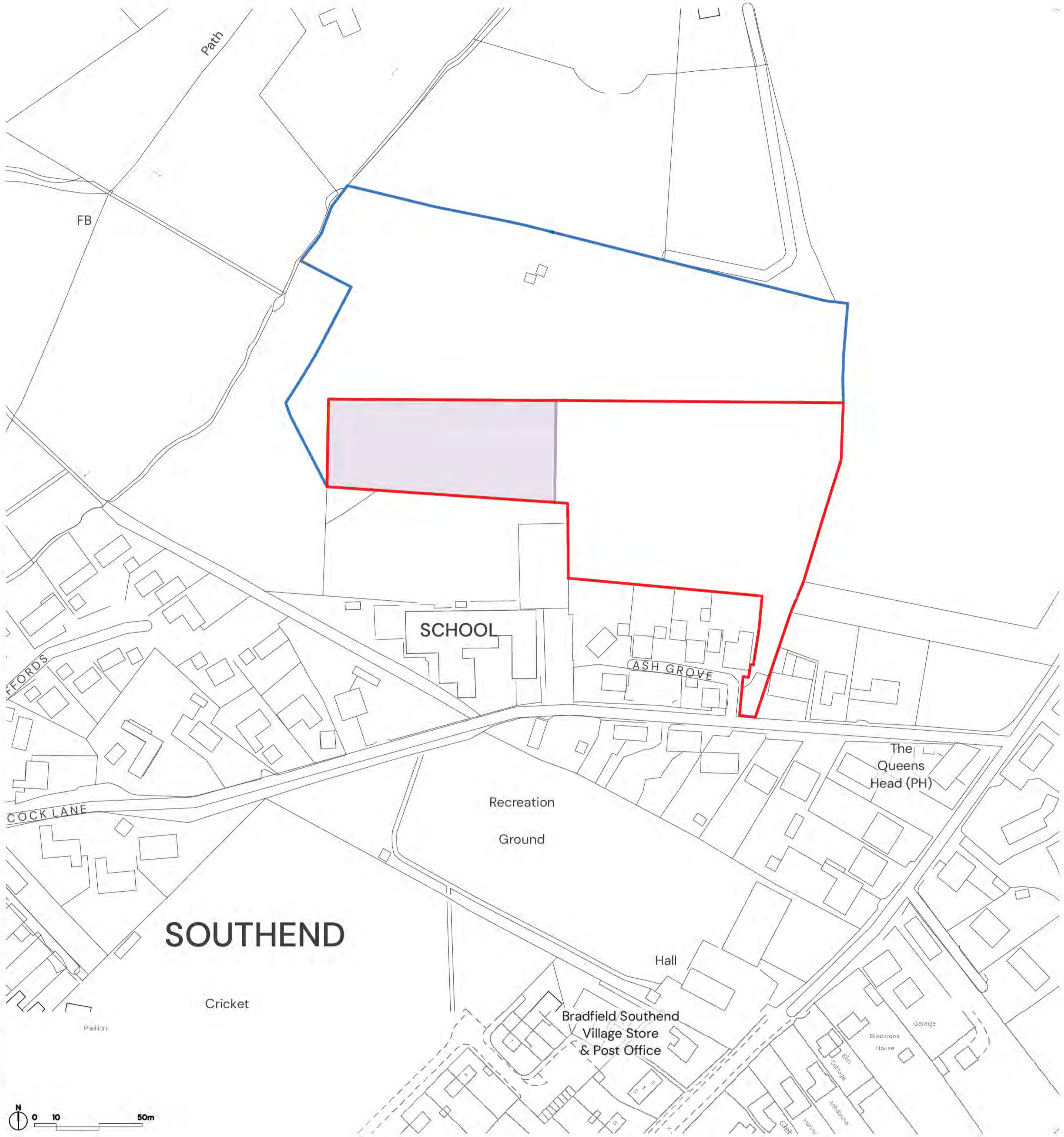
## 5. Conclusion

- 5.1. This representation has been submitted on behalf of Friday Street Developments Ltd., in support of their land interest at
- Site Reference BRAD6: Land to the Rear of Ash Grove
- 5.2. The representations demonstrate the deliverability (sustainability, availability and viability) of the proposed allocation for 16no. dwellings plus 0.46ha of education land to be gifted to the adjoining Bradfield Southend Church of England Primary School, at the above site.
- 5.3. The representations have demonstrated that development in this location can have an acceptable visual impact upon the North Wessex Downs AONB.
- 5.4. Additional Transport assessments undertaken following prior rounds of consultation have demonstrated safe and appropriate access for all users is possible to Cock Lane via Ash Grove. The Transport Statement included with these representations confirm a policy and standards-compliant design is possible subject to detailed design.
- 5.5. In conclusion, Land to the Rear of Ash Grove (BRAD6) has the ability to deliver significant benefits to existing and future residents of Bradfield Southend. Highways congestion and safety improvements around Bradfield Southend Church of England Primary can only be feasibly delivered through a donation of land linked to the site and the proposed development.
- 5.6. Additional allocations within the village, over and above the single allocation at BRAD5, will safeguard the local shops, services and Primary School and reverse current downward demographic trends. These representations have confirmed that there is no justifiable reason to limit allocations within the village to a single site.
- 5.7. The site remains deliverable and available and represents a realistic prospect for development in the short-medium term, contributing towards West Berkshire's housing delivery in the earlier stages of the Local Plan period.





## Appendix 1: Site Location Plan



- KEY**
- SITE BOUNDARY OF THE DEVELOPABLE AREA
  - EXTENT OF WIDER LAND OWNERSHIP
  - AREA OF LAND GIFTED TO SCHOOL

**ASH GROVE – SITE LOCATION PLAN** **PEGASUS GROUP**



## **Appendix 2: Previous Representations by Bell Cornwell**



**Response to the West  
Berkshire Local Plan –  
Regulation 18 Consultation**

**Land at Ash Grove**

*Prepared For*  
**Friday Street Developments  
Ltd**

**February 2021**



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## APPENDICES

**Appendix A - Indicative Masterplan**

**Appendix B - Transport Statement**

**Appendix C - Liz Lake - Landscape and Visual Assessment**

**Appendix D - Kirkham Landscape Assessment**



## 1 INTRODUCTION

- 1.1 These representations are submitted on behalf of our client, Friday Street Developments Limited. On their behalf, we are promoting the site behind Ash Grove, Bradfield Southend for a residential-led development of approximately 13 houses.
- 1.2 The representations have been informed by landscape work prepared by Liz Lake Associates (previous submitted to the Council in spring 2020) plus highways work prepared by Bellamy Roberts which demonstrates that a safe access can be provided. Additionally, we enclose an indicative Masterplan by Edgington, Spink and Hyne Ltd. This shows how 13 units could be accommodated on the site within the capacity of the landscape.
- 1.3 The indicative masterplan also shows how the delivery of the site would result in additional community benefits which could provide a nursery/pre-school on an area of land to be gifted to the school together with a countryside learning zone (which could be used for Forest School activities or similar). Additionally there is the potential of improved public access to the site. Significant landscape enhancements and new planting is also proposed.
- 1.4 In terms of the history of the site, it was first promoted through the consultations on the West Berkshire Housing Site Allocations and Delivery Development Plan Document in 2014 (?). Whilst it was not allocated at that stage, part of the site was seen favourably in landscape terms. This was set out in the Landscape Capacity Analysis that was produced by Kirkham Associates to support the assessment of sites within the North Wessex Downs AONB and to assure that they were assessed on an independent, consistent and transparent basis. We attach the Kirkham work as Appendix D to these representations.
- 1.5 Within these representations, we raise concerns about the assessment of the site by the Council. The assessment is inconsistent and inaccurate when compared with the Council's own evidence, particularly with regard to landscape. Additionally there are concerns regarding the transparency of the site assessment which we consider within the response.
- 1.6 Our previous representations do not appear to have been taken into account and no reason has been given as to why this information (which includes extensive landscape work carried out by Liz Lake Associates) has been disregarded. We attach the Liz Lake landscape assessment as Appendix C to these representations.



- 1.7 Within the earlier representations, we also made it clear that we were flexible regarding the scope of the allocation and would be happy to accommodate a smaller allocation if the Council considered this more appropriate. However, this information has not been taken into account and the site has been rejected on the basis of an assessment of the whole site (approximately 48 units). This is incorrect.
- 1.8 We are concerned that the assessments that have been made (for example from Natural England and the AONB unit) have been based on assumptions regarding only this larger quantum of development and have therefore given misleading responses to the Council which have led to the Council rejecting the site for allocation. The principle of development has also been based on a higher number – which is relevant in terms of the quantum of development that is appropriate for a service village.
- 1.9 If the assessment of the site is not re-considered, this matter will be an issue in terms of the consideration of the future soundness of the Plan, when considered against the tests set out in para 35 of the National Planning Policy Framework. This needs to be addressed before the production of the Regulation 19 (proposed submission) version of the Plan.
- 1.10 Our February 2021 representations therefore confirm the promotion of the site for allocation for 13 dwellings plus community facilities including a new nursery facility for the village. It is also proposed that the school hard court will be relocated onto the site and that the existing hard court at the school will become a school drop off and pick up area. This will have the added benefits of safer drop off and pick up, and additional/enhanced staff parking for the school.
- 1.11 Other elements of the proposal include woodland planting and other landscape enhancements, plus a countryside learning zone and a village green as a focal point for the development.
- 1.12 As part of these representations we are also objecting to the inclusion in the emerging Local Plan of a proposed allocation on land to the north of Southend Road. We will refer to inconsistencies in the Council’s assessment of the site, and compare this to the assessment of land behind Ash Grove. We will explain how this proposed allocation is not a justified choice. A key concern is that the proposal to develop next to the existing allocation at Stretton Close will, in-combination be major development in the North Wessex Downs AONB, which is



contrary to national policy. Unless this is remedied, the Local Plan will be unsound in this regard.

- 1.13 We provide a summary of our representations at section 2, below, for ease of reference.

#### **PREVIOUS PROMOTIONS**

- 1.14 The site was first promoted in response to the preferred options consultation on the West Berkshire Housing Site Allocations Development Plan Document in 2014. This promotion was landowner-led.

- 1.15 Bell Cornwell have been promoting the site since 2017, firstly through the call for sites promotions on behalf of the landowners and more recently by making representations on the earlier versions of the Local Plan Review on behalf of Friday Street Developments Ltd.

- 1.16 The representations made it clear that:

*the site offers flexibility to come forward for housing delivery either in whole or in part. There is also flexibility in terms of the quantum of housing that can be delivered.*

- 1.17 We were keen to mention flexibility as at that stage the Council had not made any decisions about their spatial strategy, the settlement hierarchy or the quantum of development to be directed to different places. However, the Council has only considered the full extent of the site which has led to a wholly inaccurate and inconsistent assessment of the site's potential.

- 1.18 We also submitted detailed landscape work in 2020 in response to the recommendation in the Kirkham analysis that:

*A full detailed landscape and visual impact assessment will be required to inform the final capacity of the site*

- 1.19 It appears that this work by Liz Lake Associates has not been considered by the Council in their assessment of the site, which is an omission that needs to be addressed in order to properly consider the site.





## 2 SUMMARY

- 2.1 We are promoting the site for **up to 13 units**, which is a suitable quantum of development for a rural service village and is the same number as is proposed for the site north of Southend Road with a policy compliant mix of types and tenures of dwellings to be confirmed through discussions with the Council. The indicative Masterplan shows how these could be delivered on site.
- 2.2 There is also potential for an element of self-build or custom build housing to be provided as part of the on-site mix.
- 2.3 The scheme would be low density and high quality, appropriate for the village location, with connections into the surrounding countryside.
- 2.4 The site can deliver additional and significant community benefits and the landowners have been in discussions with Bradfield C. E Primary School in this regard.
- 2.5 This has led to the inclusion within the scheme of a nursery/pre-school, plus a new hardcourt for the school on the site, to enable the existing court to become a pickup and drop off area for the school. Traffic issues at the school have been a concern for some time and this provision will ensure safer drop off and pick up as well as additional/enhanced staff parking for the school.
- 2.6 A countryside learning zone (to be used by the school and local groups) and a village green will be provided on the site to form a community hub.
- 2.7 The proposal will also provide woodland and tree belt enhancements and considerable net biodiversity gain.
- 2.8 We are concerned that the site has not been correctly assessed, we have previously made it clear through the site promotion that an allocation smaller than the whole site area would be acceptable. However the site has been assessed by the Council for the full site area which has led to its rejection.
- 2.9 The indicative masterplan is based on landscape work prepared by Liz Lake Associates. This has previously been submitted to the Council, we are sending it again for ease of reference.



This supports the allocation of the site in landscape terms and provides a detailed analysis of the Kirkham landscape work.

- 2.10 We object to the allocation RSA 25 land north of Southend Road, which we have assessed is not justified in terms of the evidence. We consider that the Council has been inconsistent in their assessment of that site, particularly in regard to the selection of a partial area of the site for allocation – and their previous assessment of the site.
- 2.11 In terms of access, the Transport note prepared by Bellamy Roberts confirms that a suitable access to the site can be achieved via an access road from the eastern side of 2 Ash Grove as illustrated on the submitted plans. This has been informed by a speed survey and tracking analysis. The Bellamy Roberts report provides the evidence to overcome the highways objection set out in the Council’s summary reasons for rejecting the site.
- 2.12 The issue of a covenant on the site has also been raised by the Council. In response to this, covenants in place are similar to those held on many other local sites. They are not a barrier to development but for a commercial negotiation to be undertaken once the development potential has been fully assessed. They are a legal rather than a planning matter and should certainly not be used as a reason for the rejection of a site. This is an inconsistent approach by the Council.
- 2.13 The proposal should be considered sustainable development, and would contribute positively to each of the three strands of sustainability.
- 2.14 The site is being actively promoted by a developer and is available for development immediately. It should therefore be considered deliverable. There are no landownership issues for resolution.



### 3 SITE PROPOSAL

3.1 The site is being promoted for up to 13 units and community benefits in a low density, high quality scheme. An indicative layout is shown on the masterplan for the site which is attached as Appendix A. This has been prepared by Edgington, Spink and Hyne. The proposal has been carefully considered to be appropriate to the designation of Bradfield Southend as a service village within the settlement hierarchy set out in the emerging Local Plan.

3.2 The masterplan is also shown below for ease of reference.



Proposed Master Plan

Land to the rear of Ash Grove - Bradfield Southend

Jan 2021

5696

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EDGINGTON  
SPINK & HYNE  
SHARED ARCHITECTS

3.3 The site promoter, Friday Street Developments, produce small scale and high quality individual developments which are focused on the south of England. Their proposals are bespoke to the specific site circumstances and informed by the key principles of responding to local community requirements and ensuring high standards of sustainability. This ensures that each development brings positive benefits to the local area and provides a response to local issues. In this case, the proposals have been landscape-led due to the site's location within the North Wessex Downs AONB and we therefore commissioned landscape advice at the starting point of our proposals to inform the indicative masterplan. We have also had



regard to the guidance within the NWD AONB Management Plan, which is supportive, in principle, of development on the edge of larger villages where “..all landscape and other planning issues have been resolved” (para 7.26 AONB MP). Distinctive architectural styles that help to create a sense of place are supported.

- 3.4 In terms of the detail of the development; we confirm that the proposal would provide a policy compliant quantum of affordable housing; we are aware that the policy requirement in extant and emerging development plan policy is 40% on greenfield sites of this scale.
- 3.5 In terms of the mix of sizes dwellings on the site, we are flexible in this regard and happy to discuss this with the Council as the proposal progresses. We note the Council’s emerging policy (policy SP18) on housing mix and are keen to ensure a development that contributes towards meeting the housing needs of the village and provides the most appropriate mix for the site’s size and location.
- 3.6 We are aware that there may be an unmet demand in the District for self-build/custom build products and are happy to discuss the inclusion of an element of these within our proposals in accordance with emerging Local Plan policy DC17.
- 3.7 In terms of the access arrangements, these have now been progressed via Bellamy Roberts. The work has confirmed that the access will be provided via the existing field access and that appropriate sight lines can be achieved.
- 3.8 The proposal has been refined during the last few months to ensure that it delivers additional benefits to the local school and community. As the Council will be aware, the site lies in very close proximity to the school and provides an ideal opportunity to respond to several of the school’s requirements. These have been discussed with the school before their incorporation into the indicative masterplan. We have therefore included land for a nursery/pre-school on the site, to be accessed via the school premises. This would also give the opportunity to provide a breakfast club and after school club for the primary school.
- 3.9 The land for the nursery would be gifted to the school.
- 3.10 The Bradfield Southend landowners have confirmed that the traffic and parking in Cock Lane continues to be an issue and presents an increasing safety concern to the parents, school and local residents. As local residents they have been keen to address this matter through the



development of the site. This will be done through gifting an area of land in the site to replace the existing hardcourt at the school. This will enable the existing hardcourt to be used as a parking and drop off area as shown on the plan. This has been discussed with the school on a without prejudice basis during the preparation of these representations.

- 3.11 A further benefit of the proposal is a countryside learning zone to be located to the north-west of the site. This brings positive opportunities for outside activities for the nursery/pre-school and primary school as well as the potential for local groups and organisations if appropriate. This type of outdoor activity helps children and young people to develop confidence via hands on outdoor activities. Additionally there will be a village green to provide additional recreational facilities and to serve as a community focus for new and existing residents.
- 3.12 The masterplan also shows indicatively the enhancements that are proposed to woodland and landscaping as part of the proposals. These accord with the recommendations in the Kirkham study as well as our own more detailed assessment set out in the Liz Lake analysis which is set out in further detail below. We are proposing the strengthening of the existing tree belt to the north and north east of the site as well as additional tree planting and landscaping around the site.
- 3.13 Further landscaping will be provided throughout the proposal and our aim is to achieve significant net biodiversity gain. Part of our proposals include a wildflower area in the undeveloped part of the site for the provision of native species which is shown on the masterplan.
- 3.14 The 5 metre perimeter access shown on the plan is to show a woodland path to enable a walk around the site.
- 3.15 Overall, the masterplan shows how the site can be delivered to provide a small-scale scheme which has key linkages to the local community and has the ability to provide key benefits for the primary school and wider community in the village by addressing important local concerns such as safety issues at the school caused by traffic and a lack of nursery/pre-school capacity adjacent to the primary school.



## 4 PREVIOUS AND CURRENT ASSESSMENT BY WEST BERKSHIRE COUNCIL

### SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT

4.1 We have reviewed the Council's previous Sustainability Appraisal/Strategic Environmental Assessment which was prepared alongside the Housing Site Allocations DPD (HSA DPD) and refer to what this says for our client's site and the additional site that is proposed for allocation (land north of Southend Road).

4.2 Land behind Ash Grove was previously known as site BRS006 and the site has now been given the reference BRAD6. The SA/SEA stated that a reason for not allocating the site was that it was only promoted at the preferred options stage of the preparation of the HSA DPD and so the public had not had a previous opportunity to comment on the site. This was drawn to the attention of the Council at the time.

4.3 The SA/SEA confirms that:

*"Landscape Assessment work indicates that part of the site would be suitable for development"*

4.4 This was a positive assessment, given that the starting point for sites within the AONB is their ability to be developed in landscape terms.

4.5 A site at Stretton Close (at that stage known as BRS004) was allocated through the HSA DPD and was given the reference HSA22. This has not yet progressed to delivery and has therefore been carried forward into the Local Plan (reference RSA24). A second site has now been allocated next to Stretton Close (reference RSA25). This is a site north of Southend Road. This site was also promoted through the HSA DPD and at that time given the reference BRS003.

4.6 The SA/SEA which accompanied the HSA DPD, gives the following assessment of the likely impacts of developing BRS003 and BRS004 together:

*"The LCA Landscape Character Assessment has advised that the development of both BRS003 and BRS004 would erode the traditional linear pattern of development in Bradfield Southend therefore resulting in a potential negative effect on environmental sustainability".*



4.7 As the starting point for the assessment of sites within the AONB is the impact of the sites on the landscape, it is unclear how this matter has been overcome. It is not evident from the SA/SEA which accompanies the Regulation 18 Local Plan.

4.8 The current SA/SEA is inaccurate and inconsistent in its assessment of the sites in Bradfield Southend. An example of this is sub-objective 5 (b) – to conserve and enhance the character of the landscape. Land north of South End Road has the following assessment in the SA/SEA

*The site is located within the AONB. A 2014 Landscape Capacity Analysis advised that development on part of the site could be accommodated subject to measures to conserve and enhance the natural beauty of the AONB. The site is contained on its southern edge by the settlement and much of the site extends well beyond the settlement envelope. Development of the whole site would be inappropriate in the context of the existing settlement form, pattern and character of the landscape”.*

4.9 Land behind Ash Grove is given the following analysis in response to sub-objective 5 (b):

*The site lies within the North Wessex Downs AONB. A 2015 Landscape Capacity Assessment recommended that development on the whole site would result in harm, however, the south eastern part of the site could be developed without harm. The assessment also commented that development of the whole site would result in substantial backland extension to the existing development north of Cock Lane and erosion of the linear pattern of much of the village. Whilst part of the site is acceptable in principle in landscape terms, it needs to be considered in the context of other sites being promoted for development in the village. In this regard it is the least favourable in landscape terms”.*

4.10 This is selective quoting from the relevant landscape work as the same comment was made regarding the full extent of the land to the north of Southend Road. For example, the LCA analysis of the site to the north of Southend Road states that “development of the whole site would result in substantial extension to the existing ‘backland’ development north of South End Road and erosion of the linear pattern of much of the village” – however, this is not quoted in the current SA/SEA.

4.11 There is no evidence whatsoever in the Council’s landscape work to support land to the rear of Ash Grove being ‘the least favourable in landscape terms’. This is factually inaccurate and not based on any evidence. If the Council is to reject sites for development, based on an



assessment of reasonable alternatives, it needs to ensure that the reasons are objective, defensible and clearly justified by references to the available evidence. Otherwise, this element of the Plan will be unsound.

#### **BRADFIELD SOUTHEND SITE ASSESSMENTS**

4.12 We have reviewed the above document (appendix 4F to the Local Plan review) which forms part of the background supporting evidence to the Local Plan Review – explaining how the Council has assessed the sites in Bradfield Southend to date.

4.13 In terms of the summary justification, this sets out the following:

*The AONB Unit and Natural England have advised that development would result in an incongruous extension far beyond the settlement. This would result in harm to the AONB and would not be in keeping with the linear pattern of development.*

*Highways concerns – adoptable access and 2 metre footway onto Cock Lane would not be achievable. Impact on the capacity of Cock Lane.*

*Covenant on the site which could impact upon availability.*

4.14 Our first point in response to this is that land at Ash Grove appears to have been assessed in its entirety, which has given a misleading assessment of the site. It is apparent that the comments from Natural England and the AONB team have been based on the red line plan – and that the potential of developing a smaller part of the site has not been considered. Our response to this is set out in section 3 of these representations – which explains the scheme in full as a landscape-led proposal, the scale of which conforms with the role of Bradfield Southend as a service village.

4.15 In terms of highways concerns - again the response of the highways authority in this regard is based on the full capacity of the site (48 units). We have explained in detail in these representations how a smaller site can be safely delivered in highways terms. Any highways concerns have therefore been removed.

4.16 In terms of the covenant – the inclusion of this as a concern is a surprise. In our experience, there are covenants on the majority of sites and it is not a reason to state that a site cannot





be delivered. We have discussed the issue of a covenant with the landowners and can confirm that this is a commercial matter to be negotiated by the landowners once the planning potential of the site has been properly assessed. It is a commercial/legal matter rather than a planning issue. We note that the majority of local sites have covenants and that the covenant on the local doctor's surgery has not prevented from the Council granting planning permission for two new dwellings at the site. In addition, the committee report for the recent reserved matters application at Stretton Close (20/02410/RESMAJ) states, in paragraph 6.13:

*"..a number of residents believe that no utilities can be laid underground across the application site due to restrictive covenants. The presence of effect of restrictive covenants are not a planning matter but a civil matter for the developer to address". (emphasis added).*

- 4.17 We are confident therefore that there is no justification for the council using a covenant as a reason for ruling the site out from consideration as a site allocation.
- 4.18 In response to the technical detail of the site assessment, we can confirm that there are no technical matters that would prevent the site coming forward for development. Whilst a watercourse on the northern boundary is mentioned, this is incorrect – there is not a watercourse. There are therefore no concerns in this regard.
- 4.19 We note that the Parish Council comments appear to have been based on the full extent of the site. We have since clarified the proposals and taken these forward to include additional community and environmental benefits. We hope that the Parish Council will support the scheme now that the detail has been confirmed.
- 4.20 In terms of availability – the site is now under option to Friday Street Developments Ltd. Given that they are actively promoting the site and have been working proactively with the landowners and the local community to deliver a suitable scheme, the availability can now be confirmed.
- 4.21 We are confident that we have provided the Council with clarity about the extent of the proposals as well as sufficient technical information on highways and landscape to confirm that the scheme is deliverable with the capacity of both the landscape and the highways network. We ask that this information is properly considered and the assessment of the site reconsidered.



## 5 SUPPORTING TECHNICAL INFORMATION

5.1 Together with this planning document, this site promotion is accompanied by the following technical work:

- An indicative masterplan prepared by Edgington, Spink and Hyne (Appendix A)
- A landscape, visual and capacity review prepared by Liz Lake Associates (Appendix C)
- A Transport Note including action arrangements, prepared by Bellamy Roberts (Appendix B)

### LANDSCAPE

5.2 A landscape, visual and capacity review of the site was carried out by Liz Lake Associates in March 2020, as part of the promotion of the site and to inform the indicative masterplan.

5.3 This was submitted to the Council as part of our previous representations, but does not appear to have been taken into consideration as part of the assessment of the site.

5.4 Whilst the Liz Lake report should be read and considered in its entirety as part of the assessment of the site, we summarise the findings below for ease of reference and confirm that we have used its conclusions regarding the developable area of the site and any appropriate landscape enhancement and mitigation measures set out to inform the masterplan for the site.

5.5 Views from the west, north and east into the site are limited, largely due to the screening effect of the woodland. Views from the Village to the south are afforded via the field gate access on Ash Grove, from within the properties in Ash Grove, across the School playing fields and from the Public Right of Way (PRoW) to the south-west of the site.

5.6 The North Wessex Downs AONB Integrated Landscape Character Assessment produced in March 2002 identifies that the Site lies within Landscape Character Area LCA 8A Hermitage Wooded Commons. One of the issues raised by the Character Assessment is the *lack of appropriate management of woodlands particularly ancient and semi natural woodlands formerly managed by coppicing and areas of wood pasture*'.

5.7 Development on the site would provide an opportunity to instigate mitigation measures to manage areas of the surrounding woodland which lie within the landowners control. This is

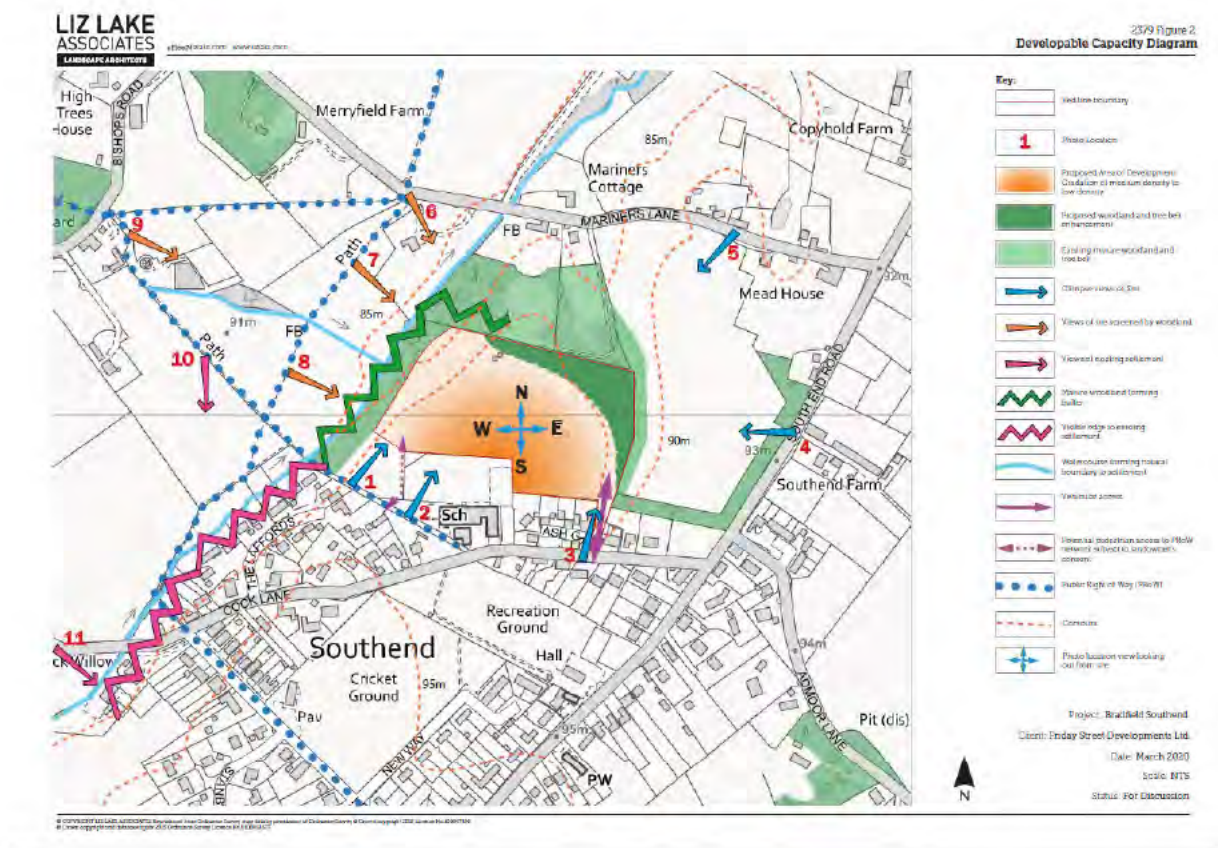


- included as part of the proposals – with a significant area of new woodland proposed to the north east of the site, together with additional landscape enhancements and programme of management of existing woodlands.
- 5.8 In terms of tranquillity, the integrated LCA notes that the Site specifically is not considered to experience particularly high levels of tranquillity in comparison to the wider surrounding landscape, due to its connection with the existing settlement.
- 5.9 The West Berkshire Landscape Character Assessment sits alongside the North Wessex Downs AONB LCA. Pertinent to the Site is that the woodland is considered key to containing settlement within the area with the role of woodland in limiting urban influence noted as a valued feature. Detractors of relevance to the site are considered to include *the 'increase in horse paddocks and increased suburbanisation where modern housing along main routes and on adjacent cul-de-sacs, together with street lighting and pavements, has introduced suburban characteristics to some places...'*
- 5.10 Overall the Liz Lake analysis concludes that a larger area of the site could be developed than concluded by the Council's landscape work. The Liz Lake analysis has taken a more detailed review of the Site than the previously published Assessments, including the 2015 LCA for BRS006 which was used as the evidence base for the HELAA assessment for BRAD6. This Review therefore challenges several of the constraints and assumptions set out in those latter documents from a more detailed professional landscape and visual perspective.
- 5.11 Attention is drawn to the recommendation in the 2015 LCA that *'A full detailed landscape and visual impact assessment will be required to inform the final capacity of the site'* (p.7) and with the HELAA that Natural England require further evidence (emphasis added) before determining whether development on the Site would be damaging to the AONB.
- 5.12 The Liz Lake report specifically addresses the majority of constraints put forward in the 2015 LCA. Several of these have been dispelled by more detailed appraisal undertaken for this report. Finally, the introduction of limited and simple mitigation measures are assessed as meaning that the threat of 'harm' to the AONB's special qualities will be significantly reduced and therefore be in compliance with the NPPF.



Whilst we have set this out in indicative form so the principle can be assessed through the Local Plan process, it is acknowledged that this would be subject to further detailed assessment as a scheme was put forward through the planning application process.

- 5.13 The reduced area of development proposed on the masterplan would ensure connectivity with the existing settlement. Additionally, there are further connectivity improvements in terms of the potential additional connections to the existing PRoW infrastructure and facilities for the school which will ensure integration of the site and the local community.
- 5.14 In summary, the Liz Lake report concludes that the Site should be considered as 'suitable' for development along the lines indicated in Figure 2 of the report (which is shown for convenience below), and that if presented with minor mitigation measures, this would be in a compliance with the NPPF, AONB Management Plan and West Berkshire's site selection process (incorporating SA/SEA).
- 5.15 As set out above, we are proposing that any allocation is limited to approximately 13 dwellings in order to concur with West Berkshire's assessment of the appropriate quantum of growth for a service village.





## HIGHWAYS

- 5.16 A Transport note, prepared by consultants Bellamy Roberts, accompanies this response. In order to establish whether a safe and suitable access to the site can be achieved for all users, a speed survey and tracking analysis have been undertaken within the vicinity of the access junction leading into Ash Grove.
- 5.17 The results of the survey established that the visibility splays should be 2.4m x 33.5m to the east and 2.4m x 39.3m to the west.
- 5.18 The access serving the development proposal has been designed to accommodate the anticipated traffic movements. The layout has been analysed to accommodate a refuse vehicle that is used by the local planning authority in this area, including swept path analysis. The Transport Statement shows how a safe and suitable access arrangement can be achieved for all users in accordance with the current standards.
- 5.19 In terms of traffic impact, this would be limited and the predicted movements can be easily accommodated on the proposed access and surrounding road network. The proposed improvements to the existing Ash Grove layout would also provide benefits to the existing road users.
- 5.20 Additionally, the Transport Statement shows that there are genuine opportunities for residents and visitors to travel to/from the site using sustainable modes of transport. Overall the scheme fully complies with the key transport requirements of the Framework and is therefore acceptable in transport and highway terms.



## 6 OBJECTION TO LAND NORTH OF SOUTHEND ROAD

- 6.1 We are not objecting to the principle of the allocation of land off Stretton Close, Bradfield Southend for development. This has already been assessed in full through the Housing Site Allocations DPD which is a material consideration in its favour as that plan remains current. There is also a reserved matters approval (granted 29/1/2021). The outline application was refused by the Council in 2018 and overturned on appeal in 2019.
- 6.2 We do note, however, that the land off Stretton Close has not been delivered to date and that there are a number of concerns from local residents about the development proposal (evidence from the Council's planning application system). Additionally the Parish Council has objected for a number of reasons.
- 6.3 We have explained above how the previous SA/SEA was negative about the in-combination effects of developing Stretton Close and land to the north of Southend Road together and that we are unclear how this matter has been overcome – given that nothing has changed on the ground or in landscape terms in the meantime.
- 6.4 Given this – and the fact that the Stretton Close development has not yet been built, it seems a perverse strategy to add more development into the same area of the village. Together these developments would provide a site of about 24 dwellings – which would be considered, in principle, too large a development for a service village if considered as a single site. A further important consideration is whether the development, when considered as a whole, constitutes major development in the AONB. Given the size of Bradfield Southend, our assessment is that developing the two sites in combination should certainly be considered major development.
- 6.5 The NPPF is clear (para 172) that in the AONB:
- Planning permission should be refused for major development, other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest”.*
- 6.6 We have not seen any evidence that this key issue has been assessed by the Council.



- 6.7 The proposed allocation of land to the north of Southend Road is therefore contrary to national policy and would therefore fail the tests of soundness as set out in para 35 of the NPPF.
- 6.8 Additionally, the location of the site does not give the same opportunities for community and educational facilities as land at Ash Grove. It is not close enough to the school to realistically assist with the delivery of any form of additional space or highways safety/parking improvements.
- 6.9 We have planned Ash Grove to be a direct replacement for land north of Southend Road by showing how 13 dwellings could be delivered on the site.



## 7 CONCLUSION

- 7.1 We are responding to this consultation to address the issues that have been raised by the Council in its assessment of land at Ash Grove (known as BRAD6). We have explained how the Council's assessment is, in principle, flawed as it is based on the whole site area. This has led to a misleading assessment which we have responded to and addressed through these representations.
- 7.2 The site is ideally placed for development as it is close to the key facilities of the village, including the pub, shop, village hall and primary school. We have shown through the illustrative masterplan that the proposal can deliver additional significant benefits for the community by providing improvements including land for Bradfield C.E School for a nursery/pre-school and a replacement hardcourt to enable new parking and drop-off arrangements on the school site, to address a long standing issue of local concern. The site is uniquely located in this regard, given its proximity to the school. These additional benefits should be seen as strong positives of the site, which provide a more holistic proposal, appropriate to meeting the needs of a service village.
- 7.3 The site has been carefully planned to show how it can be delivered within the capacity of the landscape of the North Wessex Downs AONB and we have provided technical evidence on both landscape and highways to address matters raised by the Council.
- 7.4 We have also set out our objections to the land north of Southend Road which we consider, when assessed in combination with the site at Stretton Close, constitutes major development in the AONB, meaning that the proposed allocation is contrary to national policy.





## **Appendix 3: Extract from Appendix 8b SA/SEA of New Residential Site Allocation Options (West Berkshire Local Plan Review) November 2022**

## BRAD6 Land to the rear of Ash Grove, Bradfield Southend (up to 48 dwellings)

SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment
<b>9: To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change.</b>	9(a): To reduce West Berkshire's contribution to greenhouse gas emissions	?	The impact on climate change will depend on the design/layout of the site	Climate change measures and mitigation would be required should the site be allocated for development	There is likely to have an unknown impact on all elements of sustainability.
	9(b): To sustainably manage flood risk to people, property and the environment	0	The site is unlikely to impact on flood risk as there are no flood risks on the site.		
<b>1: To enable provision of housing to meet identified need in sustainable locations</b>	1(a): To maximise the provision of affordable housing to meet identified need	+	The site is likely to have a positive impact on provision of affordable housing as it is of a scale to provide affordable housing.		There is likely to be a positive impact on social sustainability as the site would help to deliver housing to meet identified needs.
	1(b): To enable provision of housing to meet all sectors of the community, including those with specialist requirements	+	The site is likely to have a positive impact on the provision of housing as it is of a scale to provide a mix of housing types and tenures.		
<b>2: To improve health, safety and wellbeing and reduce inequalities</b>	2(a): To support healthy, active lifestyles	0	The site is unlikely to impact on healthy, active lifestyles as it is some distance from recreation facilities.		There is likely to be a neutral impact on any element of sustainability.
	2(b): To reduce levels and fear of crime and anti-social behaviour	0	The site is unlikely to impact on levels and fear of crime and anti-social behaviour.	Should the site be allocated for development consideration of good design should ensure positive impacts are realised	
	2(c): To enable the protection and enhancement of high quality multi-functional GI across the District	?	There is likely to be an unknown impact on GI as it would depend on what GI would be proposed as part of the development should the site be allocated.	Policies in the plan requires consideration of GI, therefore, should the site be allocated consideration of GI	

SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment
				provision would be required.	
<b>3: To improve accessibility to community infrastructure</b>	3(a): To improve access to education, health and other services	+	The site is likely to have a positive impact on access to community facilities as it is well located for the limited services and facilities in Bradfield Southend		The site is likely to have a positive impact on social sustainability as it is located close to existing community infrastructure.
	3(b): To support the development of access to IT facilities including Broadband particularly in rural locations	0	The site is unlikely to impact on access to IT facilities.		
<b>4: To promote and maximise opportunities for all forms of safe and sustainable travel.</b>	4(a): To reduce accidents and improve safety	? / -	There is likely to be an unknown impact on road safety, as development of the site could result in road safety concerns, but could provide improvements. However, there are concerns as to whether adequate access can be provided to the site.		The site is likely to have an unknown impact on sustainability in relation to safe and sustainable travel.
	4(b): To increase opportunities for walking, cycling and use of public transport	?	The impact of the site is unknown in relation to walking and cycling and public transport as there are limited opportunities for walking/cycling with a limited bus service.		
<b>5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced.</b>	5(a): To conserve and enhance the biodiversity and geodiversity of West Berkshire	0	The site is unlikely to impact on biodiversity.	BNG would also be required.	The site may have a negative impact on environmental sustainability as the site would result in development in the AONB. Mitigation measures would be required.
	5(b): To conserve and enhance the character of the landscape	-	The site is likely to have a negative impact on landscape as the site is within the AONB, although with adequate mitigation part of the site may be suitable for development.	Mitigation measures would be required to ensure no negative impacts on landscape.	
	5(c): To protect or, conserve and enhance the built and historic environment to include sustaining the significant interest of heritage assets	?	The site is likely to have an unknown impact on heritage assets as there is potential for heritage assets on the site which would need to be investigated.	Survey work would be required and mitigation measures may be required.	

SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment
<b>6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire.</b>	6(a): To reduce air pollution	0	The site is unlikely to have an impact on air quality		The site unlikely to impact on any element of sustainability in relation to air, water, soil or noise.
	6(b): To manage noise levels	0	The site is unlikely to have an impact on noise		
	6(c): To maintain and improve soil quality	0	The site is unlikely to impact on soil quality.		
	6(d): To maintain and improve water quality	0	The site is unlikely to impact on water quality		
<b>7: To promote and improve the efficiency of land use.</b>	7(b): To maximise the use of previously developed land and buildings where appropriate	-	The site is likely to have a negative impact on PDL as the site is greenfield.		The site is likely to have a negative impact on sustainability as the site is greenfield. Mitigation measures would be required to limit the impact.
	7(b): To apply sustainable densities of land use appropriate to location and setting.	0	The site is unlikely to have an impact on land use density.	The West Berkshire Density Pattern book study has been used to determine the development potential of the site.	
<b>8: To reduce consumption and waste of natural resources and manage their use efficiently.</b>	8(a): To reduce energy use and promote the development and use of sustainable /renewable energy technologies, generation and storage	?	The site is likely to have an unknown impact on energy use as the impact would depend on the proposals put forward on the site for sustainable energy use/generation.	Proposals would be able to ensure a positive impact should the site be allocated for development.	The site is unlikely to impact on any element of sustainability in relation to natural resources.
	8(b): To reduce waste generation and disposal in line with the waste hierarchy and reuse of materials	0	The site is unlikely to have an impact on waste generation		
	8(c): To reduce water consumption and promote reuse	0 / ?	The site is unlikely to have an impact on water consumption, however there are some concerns regarding waste water capacity.		
	8(d): To reduce the consumption of minerals and	0	The site is unlikely to have an impact on consumption of minerals.		

SA Objective	SA Sub-Objective	Effects of Policy on SA Objectives	Justification for assessment	Mitigation / Enhancement	Comment
	promote reuse of secondary materials				
<b>10: To support a strong, diverse and sustainable economic base which meets identified needs.</b>	10(a): To encourage a range of employment opportunities that meet the needs of the District	<b>0</b>	The site is unlikely to impact on employment opportunities.		The site is unlikely to impact on economic sustainability.
	10(b): To support key sectors and utilise employment land effectively and efficiently	<b>0</b>	The site is unlikely to impact on use of employment land		
	10(c): To support the viability and vitality of town and village centres	<b>0</b>	The site is unlikely to impact on the viability and vitality of the town centre.		
<b>Effect:</b>	<b>Likelihood:</b>	<b>Scale:</b>	<b>Duration:</b>	<b>Timescale:</b>	
Neutral	High	Local (AONB)	Permanent	Long Term	
<b>Summary</b>					
The site is likely to have an overall neutral impact on sustainability. Positive sustainability impacts are identified in relation to social sustainability as the site would help to meet local housing needs as well as being close to local services and facilities accessible. A negative impact on environmental sustainability has been identified in relation to the location of the site in the AONB. Landscape work states that part of the site is suitable for allocation, with adequate mitigation. A negative impact has also been identified in relation to whether accessible access to the site can be provided. A number of unknown sustainability impacts have also been identified. Many of these may be able to be mitigated but further would be needed to determine what would be required.					

<b>Spatial Area:</b>	North Wessex Downs AONB	<b>Settlement:</b>	Bradfield Southend	<b>Parish:</b>	Bradfield
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<b>Site ID:</b>	BRAD6	<b>Site Address:</b>	Land to the rear Ash Grove, Bradfield Southend
<b>Use(s) proposed by site promoter</b>	Residential	<b>Development Potential:</b>	Up to 48 dwellings but known issues exist which may reduce this number

**Recommendation:**

The site is not recommended for allocation.

**Justification:**

The AONB Unit and Natural England have advised that development would result in an incongruous extension far beyond the settlement. This would result in harm to the AONB and would not be in keeping with the linear pattern of development.

There are highways concerns – adoptable access and 2 metre footway onto Cock Lane would not be achievable. Impact on the capacity of Cock Lane.

There is a covenant on the site which could impact upon availability. This is not an issue affecting the preferred site for allocation.

**Discussion:**

**Site description:**

The site is located to the north of Bradfield Southend, entirely within the North Wessex Downs AONB. Bradfield Southend is identified as a Service Village in the settlement hierarchy.

The site is contained on the south eastern edge by the settlement. The south western boundary of the site adjoins the playing field of Bradfield Primary School. The site is accessed off Ash Grove and is otherwise adjacent to the surrounding countryside. The northern, western, and eastern boundaries are formed by tree belts.

The field is used as grazing land.

**January 2023 HELAA conclusions:**

Availability and achievability are unknown as there are historic covenants on the land.

A 2015 Landscape Capacity Assessment recommended that development on the whole site would result in harm, however the south eastern part of the site could be developed without harm.

There are a number of factors which would need to be investigated further to confirm that the site is developable - ecology and highways.

Whether the site is considered developable is also dependent on further assessment through the plan-making process, in relation to whether circumstances exist to support the change to the settlement boundary.

**Landscape:**

The site is located within the AONB. A 2015 Landscape Capacity Assessment (in which the site had the ref BRS006) recommended that development on the whole site would result in harm, however the south eastern part of the site could be developed without harm.

The AONB Unit and Natural England have advised that the site would be inappropriate for development because it would result in an incongruous extension far beyond the settlement which would be at odds with the linear pattern of development and the natural and scenic beauty of the AONB which frames the strong rural edge of the village but also acts as a buffer to the ancient woodland beyond. Given the size of Bradfield Southend, they have further advised that if required/needed only one site be brought forward for allocation. Their preference would be part of BRAD5.

**Flood risk:**

Low risk apart from high risk flow flooding from an existing watercourse which runs along the northern site boundary.

**Highways / Transport:**

Access concerns. Adoptable access and 2 metre footway not achievable direct on to Cock Lane due to probable inadequate sight lines to the left (east) and conflict with the existing private Ash Grove.

Development would impact upon local highway capacity, in particular Cock Lane.

**Heritage:**

No impact on designated heritage assets. The site is surrounded by historic farmsteads indicative of postmediaeval activity. Desk-based Assessment to better understand archaeological potential and survival required in addition to a geophysical survey

**Education:**

The site is within the catchment for Bradfield Primary School and Theale Green Secondary School. The impact of development can be accommodated within these schools.

**Environmental Health:**

The site is greenfield and there are no known contamination issues. Development unlikely to impact upon air quality. No risk of noise or vibration problems to future residents.

**Ecology:**

There are no statutory designations within or adjacent to the site. The site is not located within a Nutrient Neutrality Zone. Up to date ecological surveys will be needed to establish current site conditions and the presence of any protected species on the site.

**Minerals and Waste:**

Site lies within an existing Minerals Safe Guarding Area and part of the site is within a proposed Mineral Safeguarding Area. A Minerals Impact Assessment will be required.

**Utility Services***Water supply:*

No issues.

*Wastewater network:*

The scale of development is likely to require upgrades to the wastewater network. Thames Water have advised that the Developer and the Local Planning Authority should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan.

*Electricity network:*

There is a network of existing high voltage (HV) overhead lines (OHLs) in close proximity of the site. It is highly likely that HV network reinforcement will be required. In addition, OHLs will require diverting if works planned within immediate vicinity of line. In addition, the combined development at Benham and other areas which are fed from a common primary substation could potentially trigger some 33 kV circuit reinforcement.

*Gas network:*

The site is not underlain by a high pressure gas transmission pipeline.

**Other:**

None.

**Parish / Town Council:**

Concern on access / exit onto Cock Lane and the capacity of that road.

Expands the settlement away from the preferred option / intensification of developing within the confines of South End Road, Cock Lane and Hungerford Lane triangle.

**SA/SEA summary:**

The site is likely to have an overall neutral impact on sustainability. Positive sustainability impacts are identified in relation to social sustainability as the site would help to meet local housing needs as well as being close to local services and facilities accessible. A negative impact on environmental sustainability has been identified in relation to the location of the site in the AONB. Landscape work states that part of the site is suitable for allocation, with adequate mitigation. A negative impact has also been identified in relation to whether accessible access to the site can be provided. A number of unknown sustainability impacts have also been identified. Many of these may be able to be mitigated but further would be needed to determine what would be required.

**Availability:**

Site is in the ownership of four owners with historic covenants but available within 1 to 5 years according to promoter. Availability is considered to be unknown.

**Achievability:**

Given historic covenants achievability is considered to be unknown.

**Relationship to / in combination effects of other sites :**

The site is north of Cock Lane behind the school and adjacent houses. To the east is BRAD4. In total seven sites were promoted through the HELAA in Bradfield Southend. Two were assessed as 'not developable within 15 years'.

The in combination effects are of concern to the utilities and landscape considerations.





## **Appendix 4: Landscape, Visual and Capacity Review – Liz Lake Associates (2020)**

Landscape, Visual and Capacity Review

**LAND AT ASH GROVE, BRADFIELD SOUTHEND**

Friday Street Developments Limited

March 2020

March 2020

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Prepared by:	<b>Samantha Leathers</b>
Position:	<b>Senior Associate &amp; Chartered Landscape Architect</b>
Qualifications:	<b>CMLI, IEMA(Aff.), MLA, PG.DipUD, BSc(Hons)</b>

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Revision:	-
File name:	<b>2379/Landscape Visual and Capacity Review</b>
Checked by:	<b>Chris Jackson, Chartered Landscape Architect</b>
Date Issued:	<b>19/03/2020</b>

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### APPENDIX A: Photographs and Figures

## **1 INTRODUCTION**

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- 1.1.1 Friday Street Developments have commissioned Liz Lake Associates to undertake a review of the landscape and visual issues in relation to potential development on a parcel of land referred to as the Site, located off Ash Grove in Bradfield Southend, West Berkshire.
- 1.1.2 This report has been prepared by Samantha Leathers CMLI Senior Associate and Chartered Landscape Architect of Liz Lake Associates. Samantha has eighteen years of experience in LVIA and Landscape Design.
- 1.1.3 Liz Lake Associates is a multi-disciplinary environmental and design consultancy with over 30 years' experience of master planning, landscape, ecology, urban design, heritage and environmental impact assessment. The company is a registered practice of the Landscape Institute.

### **1.2 Scope of the Review**

- 1.2.1 The review focuses on the issues pertinent to the suitability of the Site for development, encompassing the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA) third edition (published by the Landscape Institute and the Institute of Environmental Management and Assessment 2013), and 'Landscape Character Assessment: Guidance for England and Scotland' (published by the Countryside Agency and Scottish National Heritage 2002). In summary, the approach combines information and desktop studies with on-site surveys and appraisal.
- 1.2.2 The Site based assessment involves the recording of both objective description and subjective impressions of the landscape, as well as details of the existing landscape condition. It includes a representation of the extent and nature of views to and from the Site. A site visit was carried out in fine weather conditions on 16<sup>th</sup> March 2020
- 1.2.3 This report also aims to compliment and challenge the broader assessments undertaken by West Berkshire to date, and culminating in the 2015 LCA and 2020 HELAA, and to provide further evidence to ultimately inform the review of the Local Plan.
- 1.2.4 In preparing this report we have made use of the following plans and documents:

- North Wessex Downs AONB Integrated Landscape Character Assessment 2002
- North Wessex Downs AONB Management Plan 2010
- West Berkshire LCA 'Cold Ash Woodland and Heathland Mosaic' WH4, 2019
- Landscape Sensitivity Assessment 2011
- Landscape Capacity Study 2015
- Housing and Economic Land Availability Assessment (HELAA) Report produced by West Berkshire, February 2020
- Historic Landscape Characterisation
- Historic Environment Character Zoning
- National Planning Policy Framework
- Historic England Register of Listed Buildings

1.2.5 The desktop study was also informed by relevant planning material and mapping data, including [www.magic.gov.uk](http://www.magic.gov.uk) and West Berkshire Tree Protection Order interactive map<sup>1</sup>.

1.2.6 Chapter 4, puts forward a summary of potential developable area on the Site, including any key areas of mitigation, and reviews potential capacity of that area. The analysis provided is an overview and does not constitute a detailed breakdown or masterplan for the Site. The work produced is purely from a Landscape character and visual amenity perspective and does not give consideration to other factors such as Ecology, Arboriculture, Heritage, or Highways issues which may impact development potential.

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<sup>1</sup> <https://gis1.westberks.gov.uk/ApplicationTemplates/OnlineMap/?vln=TREE%20PRESERVATION%20ORDERS>

## **2 BASELINE CONDITIONS**

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### **2.1 Site Description**

- 2.1.1 The Site is located in the northern area of Bradfield Southend, refer to Figure 1. The Village lies adjacent to the southern boundary.
- 2.1.2 The site is currently used as a paddock and for informal recreation and is approximately 3.2 Ha. Access is gained from the south-eastern corner via Ash Grove, a cul-de-sac off Cock Lane.
- 2.1.3 The site is located largely on a plateau at approximately 90m AOD with the ground falling away to the west and in the north-eastern corner. The adjacent dwellings to the south are set at a similar level, with land further south within the village rising gently to 95m AOD. Refer to Figure 2 for contour information.
- 2.1.4 Photographs from within the site are shown in Figure 3. The site is bound to the south by the rear gardens and the Primary School playing field, which contributes a fair level of (playground) noise into the site. To the west the boundary is formed of mature broadleaved woodland on a west facing valley side, beyond the woodland belt runs a watercourse. The northern boundary is also formed by a broadleaved mature woodland belt, this is thinner in the central area allowing glimpses through to a large private garden in the winter months. To the east a narrow tree belt and thin field hedge divides the site from an adjacent lower field. Views beyond that field are framed by a denser wooded belt on the opposing field boundary.
- 2.1.5 Due to the low-lying nature of the wider landscape to the west, north and east, there are no distant horizons visible from within the site at present.

### **2.2 Views Into the Site**

- 2.2.1 Views into the site from the west are largely restricted by the mature broadleaved woodland, this would be further screened during the summer months when the trees are in leaf.
- 2.2.2 Similarly views from the north are largely limited by the trees, however glimpse views from within the private gardens are assumed beyond the thinner sections of the woodland.

2.2.3 Views from the east are limited to glimpses through field gates from South End road or the eastern end of Mariner's Lane.

2.2.4 Views from the Village to the south are afforded via the field gate access on Ash Grove, from within the properties in Ash Grove, across the School playing fields and from the Public Right of Way (PRoW) to the south-west of the site.

## **2.3 Designations**

2.3.1 Refer to Figure 1 for landscape related designations on the Site and the wider setting. The Site is located with the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The Site is bound to the West and North by Priority Habitat – Broadleaved woodland.

2.3.2 The Site lies approximately 65m from the Grade II listed Thatched Cottage on Cock Lane.

2.3.3 PRoWs are prevalent to the south-west and in the fields to the west, refer to Figure 3.

2.3.4 There is a Tree Protection Order (201/21/0967 - T1) covering an Oak tree which is located within the rear garden of No. 1 Nurses Cottages on south-eastern site boundary near the access from Ash Grove.

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### 3 REVIEW OF PUBLISHED ASSESSMENTS

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#### 3.1 North Wessex Downs AONB Character Areas<sup>2</sup>

3.1.1 The North Wessex Downs AONB Integrated Landscape Character Assessment produced in March 2002 identifies that the Site lies within Landscape Character Area LCA 8A 'Hermitage Wooded Commons'.

3.1.2 Key characteristics (p. 230) pertinent to the Site and immediate surroundings are as follows:

- *'variable land cover forming an intricate mosaic of woodland, pasture and small areas of remnant heathland. Some more open areas of arable land can be found on the slopes that drop to the Pang Valley and to the south east near Beenham';*
- *'large, interconnected woodland blocks and strong hedgerow pattern with mature trees restrict views and create an enclosed and intimate character. Low wooded horizons are a feature;*
- *numerous semi-natural woodlands of ancient origin...';*
- *'many features of biodiversity interest including heathland, dry and wet woodland, bog and areas of wet meadow;*
- *dominated by small irregular fields of informal and piecemeal enclosures...';*
- *'dispersed pattern of settlement characteristic of encroachment into areas of common and woodland. Includes large nucleated villages, lines of estate cottages, loose roadside settlements as well as many dispersed farmsteads and residential country houses';* and
- *'intricate network of rural lanes, many sunken and overhung by woodland plus more intrusive road infrastructure'.*

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<sup>2</sup> North Wessex Downs AONB Integrated Landscape Character Assessment: Technical Report, produced by LUC for The Countryside Agency, March 2002

### 3.1.3

Key Issues (p.233) are also identified; it is noted that potential development on the Site could provide an opportunity to address several of these issues in the immediate landscape. Pertinent issues include:

- *'lack of appropriate management of woodlands particularly ancient and semi natural woodlands formerly managed by coppicing and areas of wood pasture'*. Development on the site would provide an opportunity to instigate mitigation measures to manage areas of the surrounding woodland which lie within the landowners control, furthermore, to appropriately manage new areas of woodland;
- *'increased traffic on the lane network (rat runs from main routes) and improvements to the lanes including kerbing, widening, signing and visibility splays which, in places create a more 'urban' character and are particularly damaging to the character of the sunken lanes'*. Localised road improvements might be required, but would be subject to further traffic assessment and would be kept to a minimum;
- *'comparative accessibility resulting in development pressures, particularly for new residential development including suburbanising influence of built development (e.g. fencing, lighting and paddocks)'*. Potential elements of this nature would be well contained within the site due to its enclosed setting; and
- *'loss of tranquillity'*. It is noted below that the Site specifically is not considered to experience particularly high levels of tranquillity in comparison to the wider surrounding landscape, due to its connection with the existing settlement (refer to Section 3.5).

### 3.1.4

Finally, the assessment notes 'Key Management Requirements' for the Character Area, the most relevant of which is maintaining loose linear settlements. Upon investigation, it is considered that whilst Bradfield Southend historically represents this pattern of development, there is effectively a hierarchy formed by the more recent developments which are accessed perpendicular to the historic linear routes of Cock Lane and South End Road. These secondary routes include Heath Road, Stanbrook Close, New Way and The Laffords, all of which digress from the original linear development pattern. This road hierarchy is clearly perceived in the settlement pattern and the more recent perpendicular/spur developments (which are mostly cul-de-sacs) do not detract from the historic linear village structure.

## 3.2 North Wessex Downs AONB Management Plan 2019<sup>3</sup>

3.2.1 The current North Wessex Downs AONB Management Plan 2019-2024 presents objectives and policies to conserve and enhance the landscape. The 2010 edition of this Management Plan is referenced in the 2015 Capacity Study discussed below, therefore, for clarity, the current relevant elements regarding development are included below.

3.2.2 Special Qualities (p.78) which are pertinent to the Site and surroundings are set out as follows:

- *'The sense of remoteness and tranquillity that comes from an undeveloped and rural quality with only limited human intervention, containing typically modest villages with distinctive and ancient settlement patterns'...* Within this special quality, the *'Lowland Mosaic remains one of the most densely settled Landscape Character Types, with a diverse range of settlements ranging from large manor houses, villages, numerous hamlets and lines of houses along the roads and lanes.*

3.2.3 Key Issues (p.79) are also identified, and those pertinent to the Site and surroundings include:

- *'d) The loss of rural character through suburbanising influences from new development (new fencing, lighting, signage, parking areas, paved footpaths, loss of native hedgerows and creation of new garden areas).*
- *e) New housing developments on greenfield sites'...*
- *'o) Development that results in a material loss of tranquillity and/ or impact on the dark night skies within the North Wessex Downs or its setting'*

3.2.4 The key issues identified through item 'd' and 'o' in particular would be subject to detailed assessments and design mitigation measures. These should be recognised as valid concerns and addressed accordingly through the planning process. The extent of enclosure of the Site and the lack of relative tranquillity are discussed in

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<sup>3</sup> North Wessex Downs AONB Management Plan 2019-2024, produced by the North Wessex Downs AONB, 2019.

Section 3.5, however, initial appraisal would suggest that development could avoid 'material loss' in either case.

### **3.3 West Berkshire Landscape Character Assessment<sup>4</sup>**

3.3.1 The West Berkshire Landscape Character Assessment replaces the Newbury District Landscape Assessment (1993) and Berkshire Landscape Character Assessment (2003); it sits alongside the North Wessex Downs AONB LCA. The site lies within LCA WH4: 'Cold Ash Woodland and Heathland Mosaic'. This is summarised as follows:

*'An area dominated by an east-west orientated, heathland ridge and characterised by varied topography, from flat plateau areas to steeply undulating slopes. Woodland is a key component in the varied and attractive land cover mosaic, giving it a distinctive role in providing a rural setting to the adjacent towns of Thatcham and Newbury and also in containing settlement within the area and contributing to the rural character' (p.177).*

3.3.2 Pertinent to the Site is that the woodland is considered key to containing settlement within the area.

3.3.3 The Assessment sets out 9 Key Characteristics (p.178-179) for the LCA, of which the following area applicable to the Site:

*'1) Geologically and topographically varied with steep and gentle undulating slopes rising to a central ridge;*

*6) Relatively densely settled, particularly along the ridge, but with woodland containment';*

3.3.4 Adjacent to the site boundaries the following characteristics are present:

*'2) Presence of surface water and small streams;*

*3) Complex pattern of land cover, dominated by woodland and with remnant heaths;*

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<sup>4</sup> West Berkshire Landscape Character Assessment, prepared by LUC for West Berkshire Council, August 2019

4) *Varied field pattern with strong hedgerows;*

8) *An accessible landscape.'*

### 3.3.5

Valued features and qualities (p.180) applicable to the Site and context include:

1) The nationally valued landscape of the North Wessex Downs AONB is recognised, specifically the *'mosaic of ancient semi-natural woodlands, plantations, remnant heathland and open farmland'* relating to special qualities of this character area.

2) The visual role of the wooded ridge crest and slopes applies to the Site and is recognised by the note that *'views from the ridge are frequently limited by tree cover'*

3) A narrow range of the varied land cover mosaic is represented by the Site and directly adjacent land. The woodland surrounding the site to the north and west is noted as Priority Habitat deciduous and broadleaved woodland.

4) The rural character quality is noted with relevance to the site in that *'the wooded context of settlements and roads helps integrate their built form into the landscape'*.

5) The strong network of PRowS is evident in the surroundings to the Site.

6) *'The role of woodland in limiting urban influence'* is also noted as a valued feature in this LCA.

### 3.3.6

Detractors (p.181) of relevance to the site are considered to include:

3) *'Increase in horse paddocks: Paddocks with weak boundary features (e.g. post and wire fences) and poor quality grassland have a localised detrimental impact on landscape character, often typifying settlement fringes'*.

6) *'Increased suburbanisation Modern housing along main routes and on adjacent cul-de-sacs, together with street lighting and pavements, has introduced suburban characteristics to some places, particularly where there is less tree cover to mask changes....'*

### 3.3.7

The Landscape Strategy set out for this LCA includes the following items which are pertinent to potential opportunities of development on the Site:

1) *'Conserve and enhance the special qualities of the nationally designated landscape of the North Wessex Downs AONB: Conserve and enhance the valued features of the North Wessex Downs AONB, including its varied landscape of woodland, heathland and farmland. Restore and enhance any features which have been lost or degraded. Ensure that changes in the landscape including land use change and development are sensitively sited and designed so as not to detract from the special qualities of the landscape'*.

4) *'Conserve and strengthen existing boundary elements: ... Preserve the wooded context of settlements, to contain and filter the impact of built form'*.

5) *'Retain the distinction between and individual identity of settlements: Retain a sense of distinction between individual settlements through a clear understanding of the role of landform, tree cover and rural buildings in characterising settings and in forming boundaries that conserve and enhance distinctions in character'... 'Avoid extended linear development along roads, which creates a more developed character resulting in the loss of individual settlement identity. More small scale focused development set back from main routes often has less impact on character and can be more readily contained by landscape.'*

### **3.4 Landscape Sensitivity Assessment of the Potential Impact of the scale and Distribution of Development in the North Wessex Downs AONB<sup>5</sup>**

3.4.1 Produced in 2011, Bradfield Southend is referred to in this report as Service Village 9 and falls within the Landscape Character Type 'Downland with Woodland'. This report concludes that there are no SHLAA sites within the settlement boundary at that time.

### **3.5 Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs AONB**

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<sup>5</sup> Landscape Sensitivity Assessment of the Potential Impact of the scale and Distribution of Development in the North Wessex Downs AONB, produced by Kirkham Landscape Planning Ltd/Terra Firma Consultancy Ltd on behalf of West Berkshire District Council, January 2011.

- 3.5.1 In 2014 a Landscape Capacity Assessment<sup>6</sup> (LCA) was undertaken for West Berkshire Council to identify potential housing sites in the AONB. This identified four potential sites adjacent to the previously identified settlement boundary, three of which were, in part, considered 'suitable' for development (excluding BRS001).



Extract<sup>6</sup>: Page 3 – 'Figure BRS.1: Bradfield Southend potential housing sites'

- 3.5.2 In 2015, another LCA<sup>7</sup> was undertaken for other potential housing sites in or within the setting of the AONB. This identified 'BRS006 Land at Ash Grove'; the Site.

<sup>6</sup> Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty, West Berkshire; Final Phase 2 Report: Bradfield Southend, produced by Kirkham Landscape Planning Ltd/Terra Firma Consultancy Ltd on behalf of West Berkshire District Council, July 2014.

<sup>7</sup> Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs AONB, West Berkshire: Report: Bradfield Southend – Additional Site, produced by Kirkham Landscape Planning Ltd/Terra Firma Consultancy Ltd on behalf of West Berkshire District Council, August 2015.



Extract<sup>7</sup>: Page 4 – ‘Figure BRS006.1: Site and viewpoint locations’

### 3.5.3

This identifies key landscape characteristics, key visual characteristics and key settlement characteristics of LCA 8A (refer to Section 3.1 above). The summary of characteristics in relation to constraints on development states:

*‘The whole of Bradfield Southend and its hinterland lies within the AONB landscape character area LCA 8A Hermitage Wooded Commons. The village extends along a low ridge at 95 to 100m AOD above the river Bourne valley to the south and the river Pang valley to the north. A minor stream in a shallow valley defines the northern FB edge of the village. The settlement is largely linear in character, as the historic nucleated hamlets have been linked through more modern housing along Cock Lane and South End Road, although these are linked by development along Heath Road. The settlement edge is fragmented but much more clearly defined at the west end of the village on Cock Lane and at the top of Aldmoor Lane. The village has few open views; with framed views into adjacent fields. The Bourne valley to the south is a local feature and the local tree and hedgerow cover helps to contain the village.*

*The village still maintains its ridgetop character and largely retains a linear pattern. The impact of modern infill development is partly mitigated by the lack of large or medium sized estates and the open space between Cock Lane and*



*South End Road. The village would benefit from a greater sense of containment and clearer definition to the main approaches into the village. This is already in evidence at Cock Lane and further development beyond the existing boundary here should be resisted. The character of Aldmoor Lane should be conserved and development should not extend down the ridgeline slopes. Minor extensions at each end of South End Road might be achieved without harm to the AONB provided that an opportunity was sought to enhance the settlement edge and the village did not expand beyond any well-defined landscape features' (p.3).*

3.5.4 The LCA then identifies the sites relationship with (p.6) and impacts on (p.7) the surroundings, the compliance with the NPPF and final recommendations for a developable area (p.8). These are identified and their accuracy questioned in detail below:

3.5.5 *'Relationship with adjacent settlement*

- *The site is adjacent to loose built form on its southern boundary, but extends beyond the current settlement edge'. 'Suitable' sites BRS003, 004 and 005 as referenced in the 2014 LCA are in similar locations beyond the current settlement edge and adjacent to loose built form on one boundary, therefore this is not considered to be a restriction to potential suitability.*
- *'The site is at the edge of the plateau on which the village sits'. It is correct that the site lies on the same contour as the adjacent existing development at the Primary School and residential properties directly to the East and West along Cock Lane.*
- *'There is very little intervisibility with the wider village'. Potential intervisibility to the Site would be greater than that of 'suitable' sites BR003, 004 and 005 due to the Sites closer proximity to the existing highway, and intervisibility beyond the northern boundary hedge of the School playing field.*
- *'Urban edge largely well vegetated, but partially open along the southern boundary'. The BRS006 Site boundary is largely well vegetated forming a natural potential edge to the settlement, with the southern boundary open of vegetation, forming a connection to the existing settlement.*
- *'Settlement between Heath Road and South End Road has been infilled with small scale developments increasing the width of the built form but generally*

*retaining the linearity, particularly along Cock Lane between the school and South End Road*'. This linear development pattern is not reinforced by the presence of The Laffords on Cock Lane, and would be further contradicted by development of BRS005 if the preferred access were achieved from Cock Lane also, therefore this is not considered to be a restriction to potential suitability.

- *'The western edge of the settlement either side of Cock Lane is clearly defined by the stream corridor*'. This feature would be reinforced by development on the Site as the existing woodland belt which forms the stream corridor continues along the western site of the land in question, thus arguably strengthening the boundary of the settlement from the western approach.

### 3.5.6

#### *'Relationship with adjacent wider countryside*

- *'Strong relationship with the wider AONB and typical of the LCA*'. It is arguable whether the Site, which is largely visually concealed from the surrounding landscape (refer to Site photographs, Appendix A), has a strong relationship with the wider setting. It is acknowledged that the enclosed field is indeed however typical of the LCA.
- *'Part of the intricate mosaic of woodland, pasture and larger arable fields*'. The site is formed of a single, average sized pasture; it does not contain varied elements of the mosaic as suggested.
- *'Strong pattern of hedgerows and woodland*'. This does not apply to the site itself, hedgerows and woodlands adjacent to the site boundaries are outside of the curtilage.
- *'Largely enclosed landscape*'. This is agreed, the site is highly enclosed, refer to photographs in Appendix A.
- *'Part of the tranquil landscape north of Bradfield Southend*'. Relative regular traffic along South End Road is audible from the site, as well as frequent activities overheard from the School playground. Furthermore, during the site visit drone plane noise was experienced from the south-east of the village and several helicopter flights passed overhead. It is however, noted that several of these are intermittent and furthermore would impact upon numerous locations in all directions from within and without the settlement.

- *'No public rights of way across the site or links to the wider countryside'*.

### 3.5.7 *'Impacts on Key Landscape Characteristics'*

- *'Potential loss of significant tree belts'*. Potential tree loss could be kept to a minimum for access requirements and would be subject to further assessment. Any development would be accompanied by a landscaping scheme including mitigation planting proposals.
- *'Loss of matrix of woodland and pasture which has links with the wider landscape'*. As noted previously, the concealed nature of the site limits its connection with the wider landscape. It is acknowledged that the woodland surrounding the site, to the north and west, makes a strong contribution to the perception of the landscape matrix.
- *'Loss of visual and aural tranquillity'*. As previously noted, the site is well concealed from the surrounding AONB landscape and therefore makes a minimal contribution to the visual tranquillity, and currently does not experience particularly high levels of aural tranquillity at present due to its high connectivity with the Settlement.

### 3.5.8 *'Impact on key visual characteristics'*

- *'The site is well screened from within Bradfield Southend and the wider countryside'*. It is well screened from the wider countryside, however, it is LESS screened from within Bradfield Southend than the 'suitable' sites BRS003, 004 and 005.

### 3.5.9 *'Impact on key settlement characteristics'*

- *'Development of the whole site would result in substantial 'backland' extension to the existing development north of Cock Lane and erosion of the linear pattern of much of the village'*. Refer to Figure 2 with regards to suitable developable area of the Site. The pattern of development produced by development on the site is not considered to be of a different form that that which would result from development on 'suitable' sites BRS003, 004 and 005.
- *'Limited visual and physical connections with the existing built form'*. As noted above, the visual connection to the existing built form is considered to be greater

than that of 'suitable' sites BRS003, 004 and 005; and the physical connection cannot be seen as greatly different to those also.

### 3.5.10 *'Summary of compliance with NPPF*

*Development on the whole of this site would result in harm to the natural beauty and special qualities of the AONB. However, the south eastern part of the site, adjacent to the settlement edge could be developed without harm to the natural beauty and special qualities of the AONB'. It is not considered that development on the site, within the limits set out in Figure 2 would result in 'harm'. The nature of the site and potential for reinforcement of existing landscape features could serve to strengthen the natural woodland belt features already present on the site.*

### 3.5.11 *'Recommendations (p.7)*

*Part of this site may be suitable for further consideration as a housing site as shown in figure BRS006.2 subject to the following requirements to conserve and enhance the AONB and to generally retain the linear settlement pattern of the village:*

- *Development is contained in the south eastern part of the site adjacent to the settlement edge'. This is not considered a necessary constraint given the existing concealed nature of the site and opportunity to reinforce the tree belt features to the east and north.*
- *'The retention of existing trees.*
- *The provision of a tree belt to contain the housing on the northern edge, continuing along the northern edge of the school grounds and linking the tree belt on the eastern edge with the wooded stream corridor on the western boundary'. The location of a proposed tree belt does not appear founded due to the concealed nature of the site from the wider landscape, and the unnatural line which would result from such a straight intervention. Aligning to the site contours and reinforcing the existing boundary vegetation, as noted above would produce, in our professional opinion, a more appropriate character to the landscape by strengthening existing mosaic features and following the natural landform.*
- *'The preferred access from Cock Lane, subject to an assessment of the impact on existing trees.*

- *A full detailed landscape and visual impact assessment will be required to inform the final capacity of the site*. This Review undertakes more detailed assessment of capacity and thus is considered to more fully represent the site potential for accommodating development.

### **3.6 Housing and Economic Land Availability Assessment (HELAA)<sup>8</sup>**

3.6.1 The outcomes of the HELAA is used to inform the West Berkshire Local Plan Review to 2036 and provide evidence base for the Neighbourhood Development Plans throughout the district. Sites assessed are not 'Allocated' but are determined 'suitable' or not subject to further examination. The HELAA refers to the assessment work undertaken in the Strategic Housing Land Availability Assessment (SHLAA), where the Site is labelled as BRS006, as noted in the Sections above in this report, however in the HELAA the site is identified as BRAD6.

3.6.2 Of particular note for the Site, BRAD6 are the following points:

- The Promoter has put forward a development potential of 40-50 dwellings. The developable area suggested is 75% = 2.4Ha. Part of site at risk of surface water flooding. Therefore the estimated development potential is stated as *'up to 48 dwellings but known issues existing which may reduce this number'* (Spreadsheet 2(A): Assessing Development Potential);
- The suitability of the site is reviewed, noting that the site extends into the AONB and confirms that development would be suitable in the southern area of the site based on the level of assessment undertaken in the 2015 LCA; and finally that Natural England require further evidence before determining whether development on the site would be damaging to the AONB;
- The Site is noted as being within 500m of Priority Habitat, Ancient woodland, European Protected Species, Priority species and 3 Local Wildlife Sites. It is assumed that, following further assessment, appropriate mitigation measures would accompany any application to avoid adverse impacts upon nature conservation and any required gains in biodiversity; and

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<sup>8</sup> Housing and Economic Land Availability Assessment, produced by West Berkshire, February 2020.

- Suitability of the site is concluded to be 'dependent on a review of the settlement boundary for Bradfield Southend in the Local Plan Review, and referred to the 2015 LCA that *'the south-eastern part of the site could be developed without harm'* (Spreadsheet 2(B): Assessing Suitability and Spreadsheet 2(E): Deliverability).

### 3.6.3

It is therefore accepted from a landscape and visual perspective that development in the south-eastern area of the site could be acceptable, and that further LVIA is required in order to fully conclude whether development of the wider site would result in harm.

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## **4 DEVELOPMENT POTENTIAL**

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### **4.1 Opportunities**

- 4.1.1 The mature woodland and watercourse along the western boundary of the site forms a strong edge to the village development and consolidates the village boundary from this approach. This is currently lacking in existing developments on this boundary (refer to Photographs 10 and 11) where there are 'weak boundary features' as highlighted as a 'detractor' in the West Berkshire LCA WH4.
- 4.1.2 The existing enclosure formed by the mature woodland to the west and north prevents significant levels on interconnectivity to the wider landscape and AONB (as noted in the 2015 LCA), thus preventing potential harm from this perspective.
- 4.1.3 The PRoW BRAD7/3 provides opportunity to introduce additional pedestrian access into the Site from the south-west (subject to Landowner/School agreement).
- 4.1.4 The shared northern boundary with the School provides opportunities to address the existing issues with School access on Cock Lane – careful design within the Site could lead to alternative access arrangements, easing existing traffic issues on the narrow lane.
- 4.1.5 The lower ground in the north-east and east of the Site where the existing boundary vegetation is sparse provides an opportunity to enhance the tree belt in this area and create biodiversity gain, and could reduce the glimpse views from the wider landscape in this direction.
- 4.1.6 Introduction of existing priority habitat woodland management beyond the Site boundary could be investigated in order to enhance this 'mosaic' feature of the West Berkshire LCA WH4.

### **4.2 Constraints**

- 4.2.1 The tree belt to the north-east and north allow glimpse views in from the wider landscape and some level of interconnectivity therefore occurs in the immediate landscape beyond the Site.

- 4.2.2 The TPO's Oak tree in the south-eastern corner of the Site would need careful mitigation or avoidance, subject to Arboricultural investigations.
- 4.2.3 Limited existing access to the Site would need to be maximised through careful assessment and highway design to allow vehicular movement and visual connection to the Site.

### **4.3 Potential Capacity**

- 4.3.1 It is acknowledged by the 2015 LCA that development on the southern area of the Site would cause no harm to the AONB following the initial Site appraisal that was undertaken for that study. Following the more detailed appraisal that has been undertaken in this Report, it is considered that, with some mitigation measures, a wider area along the same contour level could also be 'developed without harm' (HELAA).
- 4.3.2 The HELAA noted that 75% of the Site might constitute developable area – 2.4Ha (net) might be suitable, at a density of 20-30 dwellings/Ha. The 2015 LCA reduced this capacity to approximately 0.5Ha. However, following the more detailed appraisal in this report, the developable area shown in Figure 2 suggests an indicative area in the region of 2.1Ha, assuming 75% of which might be developable = 1.6Ha. (net) Thus suggesting a range of between 32-48 dwellings might be suitable.
- 4.3.3 The analysis suggests that the area to the north and east might be more suitable for lower density development given the minor connectivity with the wider landscape, and that the land in the south and west might be more suitable for medium density development given the lack on connectivity with the wider landscape and confirmed lack of harm.
- 4.3.4 This does not constitute a full capacity study and is based solely upon the landscape character and visual amenity context.
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## 5 SUMMARY AND CONCLUSION

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- 5.1.1 Following a thorough review of the published assessments, further desktop research and fieldwork, this report demonstrates the key landscape and visual issues relating to the Site within the AONB and the Village setting.
- 5.1.2 It is concluded that this report has taken a more detailed review of the Site than the previously published Assessments, including the 2015 LCA for BRS006 which was used as the evidence base for the HELAA, BRAD6. This Review therefore challenges several of the constraints and assumptions set out in those latter documents from a professional landscape and visual perspective.
- 5.1.3 Attention is drawn to the recommendation in the 2015 LCA that '*A full detailed landscape and visual impact assessment will be required to inform the final capacity of the site*' (p.7) and with the HELAA that Natural England require further evidence before determining whether development on the Site would be damaging to the AONB.
- 5.1.4 Section 3.5 of this report specifically addresses the majority of constraints put forward in the 2015 LCA. Several of these have been dispelled by more detailed appraisal undertaken for this report, or by more recent studies into now being available. Finally, the introduction of limited and simple mitigation measures could, in our professional opinion, enabled the threat of 'harm' to the AONB's special qualities to be significantly reduced, and thus for compliance with the NPPF. It is acknowledged that this would be subject to further detailed assessment as a scheme were put forward through the planning application process.
- 5.1.5 Concerns raised in the 2105 LCA that development would lack connectivity with the existing settlement are confounded by the later approval in that document for the reduced area of development in Figure BRS006.2, and furthermore the opportunity highlighted in Section 4 above for additional connections to the existing PRoW infrastructure and School access opportunities.
- 5.1.6 As noted above it is considered that the Site should be considered as 'suitable' for development along the lines indicated in Figure 2, and that if presented with minor

mitigation measures, this would be in a compliance with the NPPF, AONB Management Plan and West Berkshire's HELAA process.

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# BRADFIELD SOUTHEND, WEST BERKSHIRE

## LANDSCAPE, VISUAL AND CAPACITY REVIEW

FIGURES 1 - 3

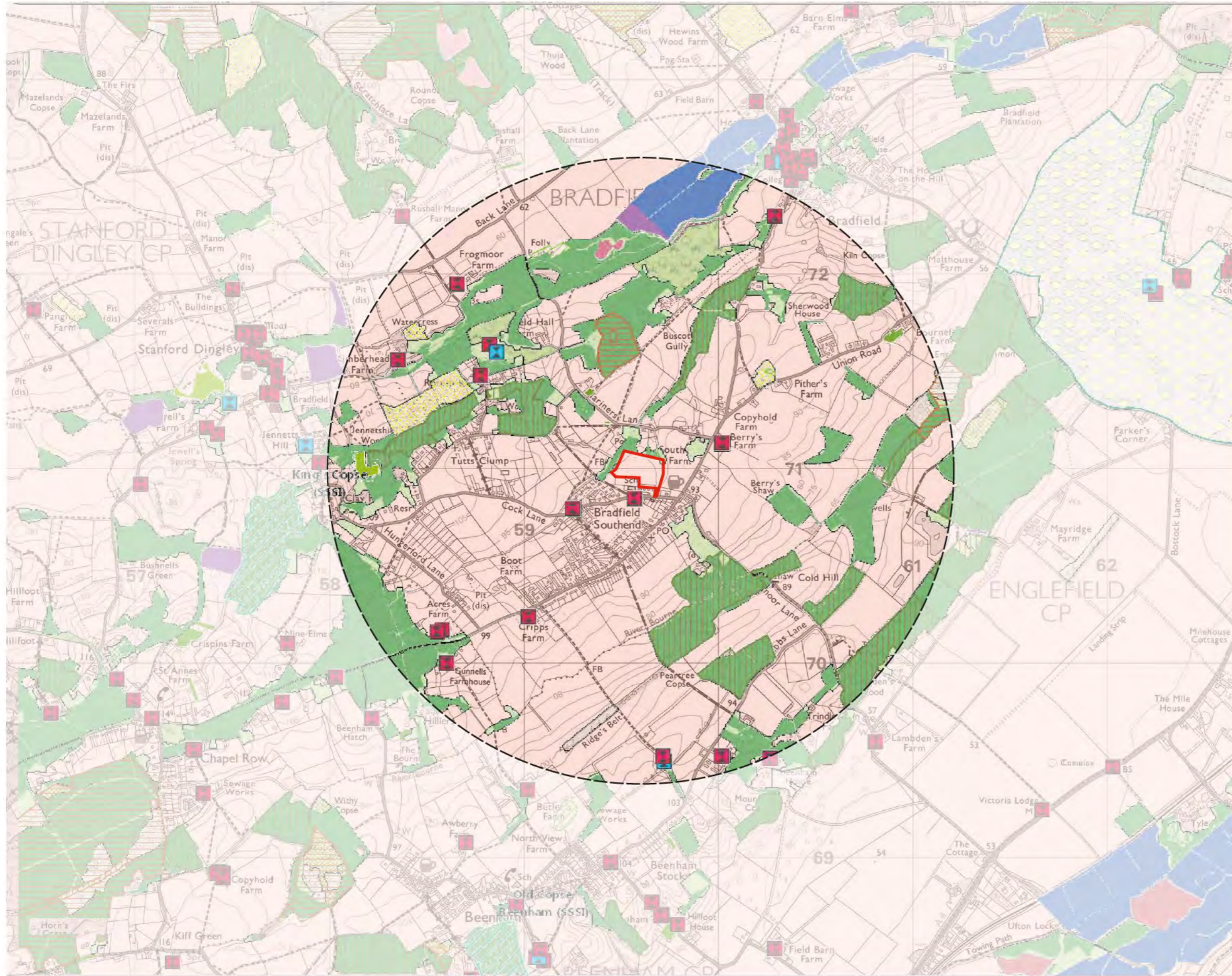
December 2019

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FIGURE 1: LANDSCAPE AND VISUAL DESIGNATIONS

FIGURE 2: DEVELOPABLE CAPACITY DIAGRAM

FIGURE 3: PHOTOSHEETS



**Key:**

-  Site Boundary
-  1.5km Radius
- Designations**
-  AONB
-  Grade II Listed Buildings
-  Grade II\* Listed Buildings
-  Coastal and Floodplain grazing marsh
-  Good Quality Semi-improved Grassland
-  Lowland Meadows
-  Lowland Fens
-  Ancient and semi natural woodland
-  Ancient replanted woodland
-  Priority Habitat Inventory: Deciduous Woodland
-  National Forest Inventory: Broadleaved
-  National Forest Inventory: Young Trees
-  Woodpasture and parkland

Project: Bradfield Southend

Client: Friday Street Developments Ltd.

Date: March 2020

Scale: 1:20,000 @ A3

Status: For Discussion

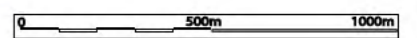






Photo Location W: View looking West from within the Site



Photo Location N: View looking North from within the Site



Photo Location E: View looking East from within the Site



Photo Location S: View looking South from within the Site



Photo Location S: Detailed View looking South from within the Site







Photo Location 1: View looking North-East towards the Site from Bridleway BRAD 7/3 (PRoW)



Photo Location 2: View looking North-East towards the Site from Bridleway BRAD 7/3 (PRoW)



Photo Location 3: View looking North-East towards the Site from Cock lane



Photo Location 4: View looking West towards the Site from Southend Road



Photo Location 5: View looking South-West towards the Site from Mariners Lane



Photo Location 6: View looking South-East towards the Site from Mariners Lane



Photo Location 7: View looking South-East towards the Site from Footpath BRAD 6/2 (PRoW)



Photo Location 8: View looking East towards the Site from Footpath BRAD 6/2 (PRoW)



Photo Location 9: View looking South-East towards the Site from Bridleway BRAD 7/2 (PRoW)



Photo Location 10: View looking South towards the existing settlement from Bridleway BRAD 7/2 (PRoW)



Photo Location 11: View looking South-East towards the existing settlement from Cock Lane

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## **Appendix 5: Transport Assessment (Bellamy Roberts).**





Land at Ash Grove  
Bradfield Southend

## TRANSPORT STATEMENT

On behalf of  
Friday Street Developments Ltd

ITR//5555/TS.2  
February 2021

*Experience and expertise working together*



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3.0 CONSIDERATION OF PROPOSAL .....	1
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## APPENDICES

- Appendix 1 Visibility Splays Drwg No. 5555/002 Rev B
- Appendix 2 Access Layout Plan Drwg No. 5555/001 Rev A
- Appendix 3 Swept Path Analysis Drwg No. 5555/202 Rev A

## 1.0 INTRODUCTION

1.1 Bellamy Roberts LLP, Highway and Transport Planning Consultants has been instructed to advise and comment upon matters associated with the site located to the rear of Ash Grove, Bradfield Southend.

1.2 The highway and transport assessment of the potential housing site is based upon advice within the National Planning Policy Framework (NPPF), in particular paragraph 108, and guidance within Manual for Streets (MFS). The site has been visited and a speed survey undertaken in order to prepare this report.

## 2.0 PROPOSAL

2.1 The proposal is for 10 - 15 dwellings located at the rear of the existing properties at Ash Grove, Bradfield Southend. The site is to be served by an improved access road from Ash Grove as illustrated on the submitted plans.

## 3.0 CONSIDERATION OF PROPOSAL

### **Sustainable Transport**

3.1 The site is located within the settlement of Bradfield Southend, close to the amenities, including a Village Store, Post Office, Bradfield Primary School, Village Hall, Public House and individual commercial premises.

3.2 There is a public bus service nearby (within 400m), Route 41 which serves the area and nearby Newbury, Thatcham and Calcott.

3.3 The village is defined as a service village in the spatial strategy of West Berkshire Council's Core Strategy and has been continued in the Local Plan Review.

3.4 Such definition means that the area has been assessed by the Local Planning Authority as appropriate for additional development due to its sustainability attributes.

3.5 The village and subject site remain an appropriate and sustainable location for future development within a range of facilities and services.

#### Access

3.6 In order to establish whether a safe and suitable access to the site can be achieved for all users, a speed survey and tracking analysis have been undertaken.

3.7 A speed survey was commissioned and Base Point Data undertook an automatic traffic counter (ATC) for a seven day period from the 20<sup>th</sup> to 26<sup>th</sup> January 2021 on Cock Lane within the vicinity of the access junction leading into Ash Grove.

3.8 The results of the survey established the following 85<sup>th</sup> percentile traffic speed along Cock Lane in the vicinity of Ash Grove:

- Westbound flow – 26.4 mph
- Eastbound flow – 29.4 mph

3.9 As the weather was inclement during the survey period no wet weather reductions in speeds have been applied.

3.10 Hence, in accordance with the (MfS) paragraph 7.5.3, the visibility splays should be 2.4m x 33.5m to the east and 2.4m x 39.3m to the west.

3.11 A plan depicting the splays is attached at **Appendix 1**, (reference 5555/002 Rev.B).

#### Access Layout

3.12 The access serving the development proposal has been designed to accommodate the anticipated traffic movements. The arrangement utilising the existing access serving Ash Grove provides a link road, 4.8m wide with 1.8m wide footway. The plan depicting the layout is illustrated at **Appendix 2**, (reference 5555/001 Rev A).

3.13 The layout has been analysed to accommodate a refuse vehicle that is used by the local planning authority in this area. The swept paths of the refuse vehicle are attached at **Appendix 3**, (reference 5555/202 Rev A), and illustrate that the vehicle can be accommodated and use the access route to service site.

3.14 It has been shown that a safe and suitable access arrangement can be achieved for all users in accordance with the current standards.

#### **Traffic Impact**

3.15 A development of 10 to 15 dwellings, in accordance with the TRICS database would likely generate during the network peak hour periods, in the region of 5 to 8 vehicle movements two-way.

3.16 Such movements can be easily accommodated on the proposed access and surrounding road network. The proposed improvements to the existing Ash Grove layout would also provide benefits to the existing road users.

## **4.0 CONCLUSIONS**

4.1 The proposed site is to accommodate 10 to 15 dwellings. The assessment on highway and transportation matters has demonstrated that:-

- There are genuine opportunities for residents and visitors to travel to/from the site using sustainable modes of transport.
- The site access and internal road layout can be safe and suitable to serve the site for all users.
- The traffic generated by the development would be low and the access route and surrounding road network can accommodate such traffic movements.

4.2 The scheme fully complies with the key transport requirements of the Framework and is therefore acceptable in transport and highway terms.

# APPENDICES

# APPENDIX 1



REVISION	AMENDMENT	DRAWN	DATE	CHK
A	Visibility Splays Updated	ARM	29/01/21	ITR
B	Minor Updates	ARM	02/02/21	ITR



**Bellamy Roberts**  
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 Hampshire, RG29 1TU  
 Tel: 01256 703355  
 Email: info@bellamyroberts.co.uk

CLIENT	Friday Street Developments Ltd	DATE	15/01/21
PROJECT	Ash Grove, Bradfield, Southend	DESIGN BY	ARM
TITLE	Proposed Access Visibility	DRAWN BY	ARM
		CHECKED BY	ITR
		SCALE	1:250 @ A3
DRAWING No.	5555 / 002	REV No.	B



## APPENDIX 2



REVISION	AMENDMENT	DRAWN	DATE	CHK
A	Minor Updates	ARM	02/02/21	ITR



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CLIENT	Friday Street Developments Ltd	DATE	15/01/21
PROJECT	Ash Grove, Bradfield, Southend	DESIGN BY	ARM
TITLE	Proposed Access Road 4.8m Option	DRAWN BY	ARM
DRAWING No.	5555 / 001	CHECKED BY	ITR
		SCALE	1:250 @ A3
		REV NO.	A

# APPENDIX 3



REVISION	AMENDMENT	DRAWN	DATE	CHK
A	Minor Updates	ARM	02/02/21	ITR



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 Tel: 01256 703355  
 Email: info@bellamyroberts.co.uk

CLIENT	Friday Street Developments Ltd	DATE	15/01/21
PROJECT	Ash Grove, Bradfield Southend	DESIGN BY	-
TITLE	Swept Path Analysis Refuse Vehicle Proposed Access - 4.8m Option	DRAWN BY	ARM
DRAWING No.	5555 / 202	CHECKED BY	ITR
		SCALE	1:500 @ A3
		REV No.	A



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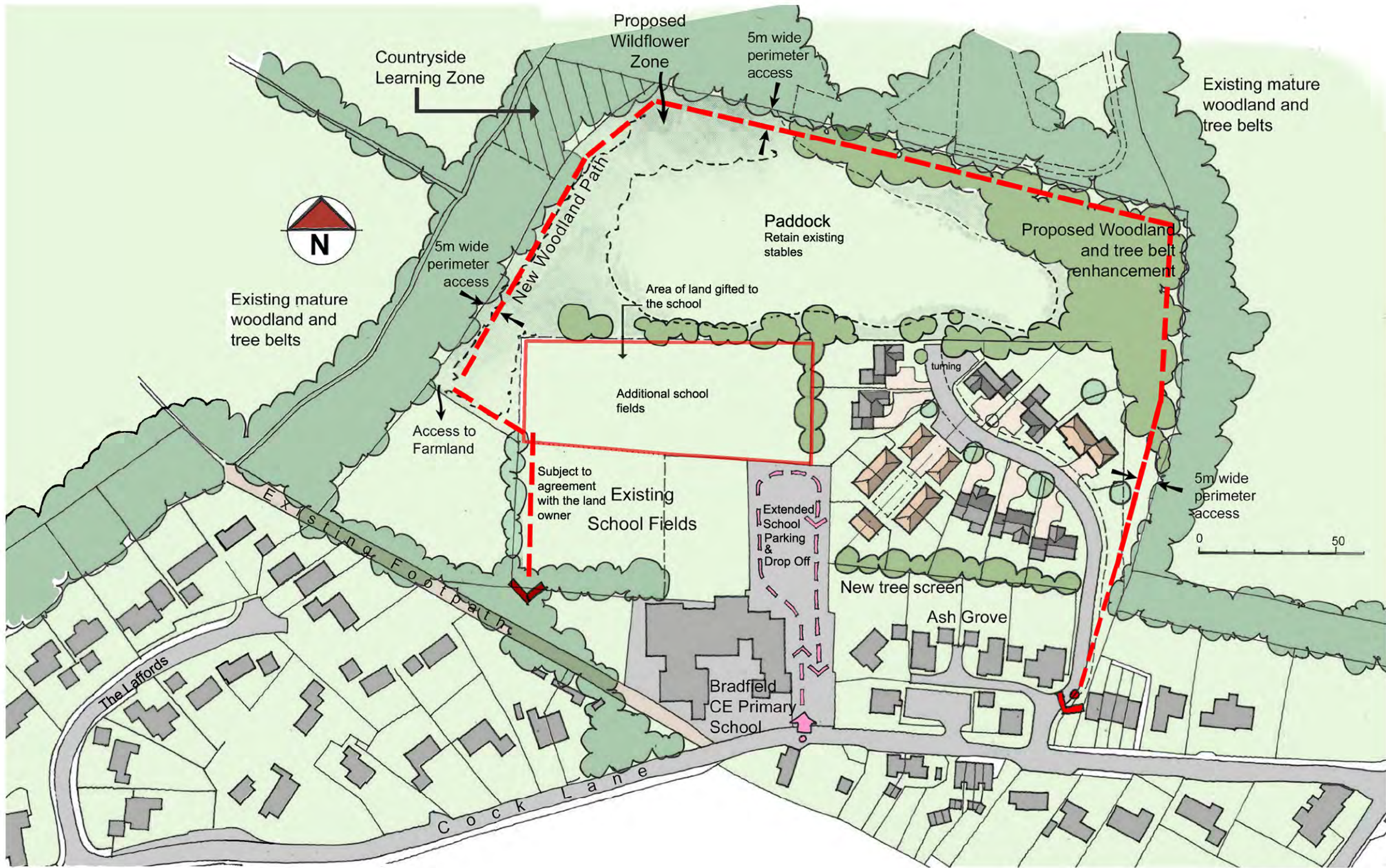
Reg No OC303725. Registered Office: Clover House, Western Lane, Odiham, Hampshire RG29 1TU

**Partner:**  
IT Roberts MCIHT  
**Associate Partner:**  
MJ Twinbarrow BEng  
**Consultant:**  
GD Bellamy BSc CEng MICE

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## **Appendix 6: Proposed Masterplan (February 2023)**



Proposed Master Plan

Land to the rear of Ash Grove - Bradfield Southend

February 2023 5696



## **Appendix 7: Letter of Support from Oxford Diocesan Board of Education**



Church House Oxford  
Langford Locks  
Kidlington  
Oxford OX5 1GF

Henry Courtier  
Director  
Pegasus Group  
21 Ganton Street  
London  
W1F 9BN

2 March 2023

Dear Henry

**Ash Grove Development Adjoining Bradfield C of E Primary School**

Thank you for your recent email. I have welcomed the discussions with you, which could eventually lead to an improvement to the site of Bradfield Church of England School.

As you have correctly identified the school is located on a restricted site and would greatly benefit from some further land which your proposed development has the potential to provide. Clearly options to provide extra land for schools generally are very difficult to secure, so I am broadly supportive of your scheme and I would certainly welcome the opportunity to pursue this possibility further with you and the landowners as the scheme progresses.

If you require any further information at this stage, please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

Gordon Joyner  
Deputy Director

[Redacted contact information]

[Redacted contact information]

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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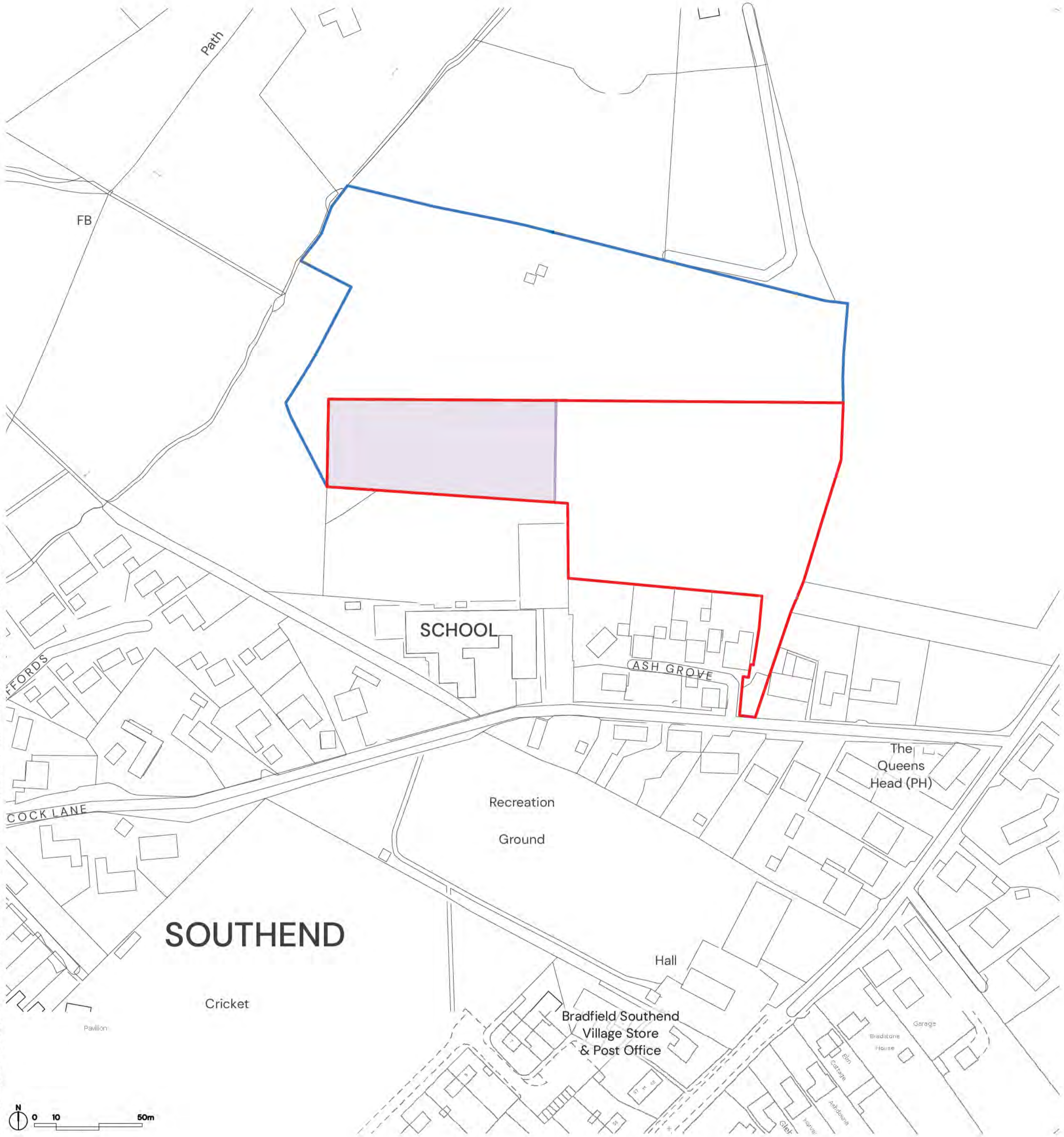


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- KEY**
- SITE BOUNDARY OF THE DEVELOPABLE AREA
  - EXTENT OF WIDER LAND OWNERSHIP
  - AREA OF LAND GIFTED TO SCHOOL

**ASH GROVE – SITE LOCATION PLAN** **PEGASUS GROUP**