

5<sup>th</sup> August 2020.

**To:** Councillors Phil Barnett; Jeff Beck; Billy Drummond; Nigel Foot; Roger Hunneman; Pam Lusby Taylor; David Marsh; Vaughan Miller; Andy Moore; Gary Norman; Tony Vickers

**Substitutes:** Councillors Jon Gage, Martin Colston, Jo Day, Stephen Masters, Jeff Cant

Dear Councillor

You are summoned to attend a Special meeting of the **Planning & Highways Committee** **Monday 10th August 2020 at 7.00 pm.**

**The purpose of the meeting is to formulate the response of Newbury Town Council regarding Planning Application Ref no. 20/01238: Sandleford Park, Newtown Road, Newtown, Newbury for Bloor Homes & Sandleford Farm Partnership.**

The meeting is open to the press and the public. Join Zoom Meeting  
<https://us02web.zoom.us/j/89904177619?pwd=ekJ1MU1hVm9lMVJLemJKMTdTcVRFQT09>

Meeting ID: 899 0417 7619

Passcode: 556531

**Hugh Peacocke**  
**Chief Executive Officer**

1. **Chairman's welcome and Announcements**
2. **Apologies**  
*Chief Executive Officer*
3. **Declarations of Interest and Dispensations**  
*Chief Executive Officer*  
**To receive** any declarations of interest relating to business to be conducted in this meeting and confirmation of any relevant dispensations.
4. **To hear the views and comments from the applicants and any members of the public who wish to address the Committee regarding this application**
5. **To consider the recommendations received from the Sandleford Joint Working Group (attached)**
6. **To agree the response from Newbury Town Council to the planning authority**

Town Hall, Market Place, Newbury, RG14 5AA

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## **The Sandleford Joint Working Group**

The Sandleford Joint Working Group (JWG) was established by Newbury Town Council and Greenham Parish Council for the purpose of advising both Councils on matters relating to proposed developments at Sandleford Park.

The terms of reference of the working group are attached.

Both Councils agreed that the Working Group should be convened to assist them to respond to the planning authority regarding planning application reference 20/01238.

Newbury Town Council appointed Councillors Roger Hunneman, Phil Barnett and David Marsh to sit on the Working Group . Councillors Adrian Abbs, Ken Neal and Tony Vickers represented Greenham Parish Council.

Councillor Chris Foster was invited to advise the JWG on ecological matters.

Over the past 3 weeks the Working Group has met on four different occasions:

20<sup>th</sup>, 22<sup>nd</sup> and 30<sup>th</sup> of July and 4<sup>th</sup> August.

At the first meeting Councillor Roger Hunneman was elected chairman and a programme for progressing the work was agreed.

At the meeting held 22<sup>nd</sup> July representatives from Bloor Homes attended for a questions and answer session which helped to inform the views of the JWG.

The recommendations as attached were agreed over the following 2 meetings.

The Joint Working Group was supported by Hugh Peacocke, Chief Executive Officer of Newbury Town Council and Lisa Blake (Clerk) and Jenny Curry (Deputy Clerk) of Greenham Parish Council.

# **Sandleford Park Joint Working Group of Newbury Town Council and Greenham Parish Council**

## **Terms of Reference**

### **Purpose**

1. The purpose of the Joint Working Group is to make recommendations to the constituent Councils (Newbury Town Council and Greenham Parish Council) addressing issues regarding development proposals for Sandleford Park.
2. This document records the parties' agreement to the objectives, parameters and scope of the work, and the process the Joint Working Group will use to develop these principles.

### **Background**

3. The Planning Authority, West Berkshire District Council is empowered to deal with planning applications for proposed development at Sandleford Park, Newbury. The constituent parish councils are statutory consultees in the planning process.
4. The Sandleford Park lands cross the boundaries of both parish councils.
5. Both parish councils agree that they could benefit by working together and sharing local knowledge and expertise when considering the development proposals and any amendments or revisions to the development proposals, including where appropriate, "Applications for the Approval of Details Reserved by Condition".

### **Objectives**

6. To make recommendations to each parish council when considering development proposals for Sandleford Park and any amendments or revisions to the development proposals, including where appropriate, "Applications for the Approval of Details Reserved by Condition".

### **Membership**

7. The Joint Working Group shall comprise 3 Councillors from each Council

### **Meetings**

8. Either of the constituent Councils may request a meeting of the Joint Working Group.

### **Quorum**

9. The quorum for meetings of the JWG shall be 4, with at least 2 members from each Council.

### **Support**

10. The Clerks of the Councils will provide secretariat support to the Joint Working Group as required.

## Recommendations to Newbury Town Council and Greenham Parish Council re Planning Application ref. no: 20/01238/OUTMAJ

Sandleford Park, Newtown Road, Newtown, Newbury for Bloor Homes & Sandleford Farm Partnership

The Joint working Group recommends strongly that both parish Councils should call on the Planning Authority to refuse planning permission for this application.

The reports submitted and the research carried out are grossly inadequate and there are strong reasons for refusal.

### 1. Planning Principles

#### 1.A A single planning application for Sandleford Park:

The Planning Authority's policy in this matter is set out clearly in the Sandleford Park (Supplementary Planning Document), 2015, which states as follows:

Sandleford Park Supplementary Planning Document March 2015 West Berkshire Council	31
Section F: Development Principles	

### S. Single Planning Application

**S1. The Council requires proposals for the site to be brought forward by means of a single planning application for the site in order to achieve a comprehensive development and to ensure the timely provision of infrastructure, services, open space and other facilities in a properly coordinated fashion.**

The Core Strategy allocates Sandleford Park as a single site to ensure the optimum approach to the development and to deliver one community. A single application will therefore enable a holistic approach to a comprehensive development across the site which maximises its potential as a well-planned and sustainable urban extension.

A single application will also enable the development to be properly assessed as a whole to ensure that it achieves the vision and objectives for the site as set out within this SPD. This will enable the required infrastructure to be properly planned and delivered in an integrated and timely way across the site. It will also ensure that the site is designed as whole in a cohesive manner.

We support the planning authority's development principle in this matter and we think it is essential that these lands should be developed as a coherent whole in one single planning application.

This application is not in combination with the remainder of the lands and accordingly permission should not be granted for this proposed piecemeal development.

## **1.B Outdated planning framework**

The development of these lands was originally proposed in West Berkshire Council's Core Strategy 2006-2026 (adopted July 2012). Sandleford Park will not have delivered any new homes by 2026 (nor, in terms of current housing allocation need in the district, is it required to).

The Core Strategy is now out of date and does not reflect the current situation, as dictated by the Covid pandemic and the climate emergency. The models for housing delivery in the Strategy are also out of date and do not have regard to permitted development rights and the increasing level of conversions of commercial and other properties to residential.

The Council's Environment Strategy (6.2.5) states that "a robust and ambitious Local Plan for West Berkshire" that will "guide planning and development up to the year 2036" is "currently going through a process of review".

The Local Plan Review, to 2036, which is expected to be completed in 2023, will address these matters.

In view of this, we strongly believe that:

- 1 The Sandleford site should be reconsidered as part of the revised Core Strategy and Local Plan review process.
- 2 Any development proposal on these lands should therefore be deferred pending the completion of the Local Plan Review and any application for the development of Sandleford Park should be regarded as premature until the review is completed.

## **2. Traffic Modelling & Active Travel.**

We find the Transport Assessment (TA) deficient in several respects, taking account of recent developments in national and local policy as well as the current Covid-19 and Climate Emergencies. A significant incentive for modal shift will be needed to reduce the motivation for residents of the new development to take to their cars, causing serious and unacceptable congestion on the highway network.

**2.A** The site is surrounded on three sides by busy main roads which the traffic from this site will make even busier. Apart from schools and a country park, there are no facilities on site, which is also separated from the Kennet Valley by a sufficiently steep and long hill to deter many cyclists.

**2.B** The build phasing proposed does not deliver any on-site retail, community or employment facilities until very late on (probably well after 2031, which is the date for the VISSIM modelling). Even then, it will be barely significant in terms of its impact on peak traffic volumes.

**2.C** Therefore the location and design of junctions connecting cycling and walking routes within the site and those surroundings roads is extremely important. At all of these junctions, people must feel safe, must be given priority over vehicles and must be offered direct and convenient routes onwards to their destinations.

**2.D** At present, the Transport Assessment shows little more than token concern for this. It assumes ‘as the crow flies’ distances, whereas pedestrians and cyclists do not fly and direct, safe routes for them through South Newbury urban area do not exist. Table 2.1 “Local Facilities” gives distances from “nearest proposed access”, whereas site accesses are up to 1km from journey origins (homes) within the site. This puts Kennet Centre and Newbury rail station beyond the 2km regarded as acceptable walking distance.

**2.E** Apart from the A339 crossings onto Deadman’s Lane and Pinchington Lane, which are both light-controlled and lead towards the main Newbury Retail Park, none of the new crossings of Monks Lane and Andover Road are proposed to be controlled by lights. The existing crossing of Monks Lane west of Rupert Road is well located and connects to existing quiet safe routes towards major destinations in the valley but the toucan crossing near Falkland Surgery does not lead to any safe crossing of Andover Road towards Monument Place facilities. The ‘peanut’ double roundabout there is unattractive and unsafe for pedestrians or cyclists.

**2.F** We therefore do not accept that the “Sustainable Access Strategy” set out briefly in 4.27 of the TA, is good enough. More needs to be done to “maximise the number of trips undertaken by sustainable modes”, otherwise the traffic already predicted to cause queues of 80 vehicles at the St Johns Road [sic] roundabout (i.e. A343 / A339 junction which locally is known as Burger King Roundabout) will be even more severely congested.

**2.G** Specifically “inclusion of a local centre”, mentioned in one of 4.27’s bullets, is irrelevant as a means of reducing car journeys if the centre is not delivered until well after 2031 and is the wrong side of the central valley crossing for almost all the by then residents of the Bloor site in any case.

**2.H** Published this week and presumed to take immediate effect as national policy is the DfT’s Local Transport Note 1/20 “Cycle Infrastructure Design”. This strongly emphasises the need for cycling and walking to be given higher priority in all future highway design and traffic studies. In particular it highlights the dangers presented by “normal roundabouts”, endorsing the comments of Spokes with reference to the previous 2018 Bloor proposals for the main spine road junction with Monks Lane. This is just one of numerous features of the TA which must be re-assessed if these proposals are to be acceptable. At present, this roundabout manages to destroy some 150m of good urban cycleway without replacing it with anything safe for a far higher potential number of cycle journeys.

**2.I** Linked to LTN1/20 is the emerging Local Cycling and Walking Infrastructure Plan (LCWIP) which is due to be adopted by West Berkshire Council, as Highway Authority, in early 2021 and will form part of a refreshed Local Transport Plan soon afterwards. All proposals for Sandleford Park strategic site must be reviewed in the light of these policies.

**2.J** For the modal shift base assumptions to be valid, we believe the traffic modelling must await data that reflects the post-Covid economic and social “new normal”. This may not be available until the next (2021) census. However, we believe that it would be irresponsible to make peak traffic predictions for Sandleford until this data is available.

**2.K** The application does not seem to take account of planning permissions given after the referenced traffic survey was done (the university planning app and associated works is a particular example of something creating large traffic flows that does not seem to have been considered). The traffic studies needs to account for all current and known applications that add to the overall load on the surrounding roads.”

### **3. Environmental and Ecological considerations**

#### **3.A Protection of the ancient woodlands at Sandleford Park**

Without significant mitigation the development is likely to result in deterioration of the ancient woodlands on site, failing to meet the policy objectives of the NPPF. Although standing advice from Natural England recommends a buffer zone around ancient woodland of at least 15 metres, there is a significant body of evidence suggesting large developments will have serious impacts beyond this distance. A recent study published in the Arboricultural Journal suggests that the root systems of trees in ancient woodlands, including oak which is the dominant tree species in the Sandleford woods, frequently extend to 25 metres.

In addition to direct damage to tree root systems, other impacts outlined by *Impacts of Nearby Development on Ecology of Ancient Woodland* (Woodland Trust, 2008, addendum 2012) include trampling, fly-tipping, vandalism, increased predation (by domestic pets and by wild predators such as magpies attracted to the area by gardens), introduction of invasive plant species, noise and light pollution, changes in patterns of shade, and nutrient enrichment. All of these would be insufficiently mitigated by a buffer of 15 metres. **The development should therefore provide a buffer of at least 50 metres around the ancient Woodlands, as recommended by the Woodland Trust**

We note that Wiltshire Council, in their core strategy adopted in 2015, calls for a 100m buffer between all ancient woodland and build development. The buffer should consist of semi-natural habitats such as woodland, scrub, grassland and wetland planting, in line with Natural England guidance, and should not contain pathways or other infrastructure.

We also note the Woodland Trust's requirement, in their Planner's Manual for Ancient Woodland and Veteran Trees (2019) for "implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met". The outline monitoring plan contained in the Ecological Mitigation and Management Plan submitted by the applicants (Appendix F18) only proposes monitoring of bluebell populations. This should be significantly enhanced to include for example monitoring of ancient woodland indicator plant species and breeding bird populations.

With regards to trampling, we note that it is 'not considered ancient woodland indicators will be impacted as they are located along existing tracks' (Appendix F18). However, since the woods are currently in private ownership with no public access it is likely that use of the tracks will significantly increase. This should be considered when designing any access plan. The developer should consider only providing access on fenced boardwalks as currently proposed for the wet areas.

Clearly the width of a buffer to ancient woodland blocks makes a very significant difference to the number of homes capable of being accommodated on Sandleford Park site and hence the traffic volumes generated and the design of access points. The drawings in Appendix 1 (attached, pages 10 to 16) clearly illustrate the impacts that varying widths of buffer zones would have on the overall development. Appendix 2 gives more detailed information on planning policies for ancient woodlands and ecological mitigation and management plans.

### **3.B Nature corridors and wildlife studies.**

We believe that in its current form the application fails to conform with West Berkshire Council's newly published Environment Strategy, which proposes (6.2.6) the creation of a Nature Recovery Network, which it describes as "a joined-up system of places important for wild plants and animals" that would allow "plants, animals, seeds, nutrients and water to move around more freely".

We are concerned that the wildlife surveys conducted at Sandleford are neither up to date nor exhaustive. For example, conservation organisations such as the Berkshire Badger Group do not appear to have been consulted. We also have doubts as to whether it has been possible for thorough ecological surveys of the private areas of the site, some of which appear to have been given over to shooting, to be undertaken.

### **3.C Environment and Sustainability**

There is insufficient attention to sustainability in the development as proposed. For instance, the houses should be aligned so as to maximise the benefits of solar energy. Simple things like the alignment of roofs to benefit say solar energy have a direct effect on what would be the proposed layout of roads and therefore traffic flows on and off



site. It is imperative that this information is provided at the outline planning permission stage in order to fully assess any planning application.

As submitted, this application does not come close to the requirements of West Berkshire's Environmental Strategy, or current solar energy and sustainable provisions, as required following the climate emergency declarations of all councils in this area.

**If the Planning Authority is minded to approve the application and grant permission for the proposed development they should attached conditions to include the following:**

1. The main access road must be a light-controlled junction and not a roundabout. Bus lanes should be considered at the light controlled junction onto Monks Lane and other junctions with bus egress with preferential egress from the estate given to buses before car movements are allowed. This could be controlled by sensors on the lights and transmitters on the buses.
2. All cycling and walking infrastructure must be planned and designed in accordance with LTN1/20 and the emerging LCWIP
3. The double roundabout at the A343 / Monks Lane junction must provide safe pedestrian & cycle crossings from A343 (E side) both north and south of Monks Lane, preferably light controlled and if necessary by taking up land occupied now by The Bell pub.
4. All construction traffic for the whole Sandleford Park site must use the new A339 junction, which is due to be available by early 2022. Reason, to avoid construction traffic accessing the site from Monks Lane
5. The local centre must be delivered much earlier in the build-out, ideally before 500 homes are occupied.
6. The developer should consider provision of ponds or other wetland areas to attract wildlife and form an attractive element of site landscaping. The proposed valley crossing could form part of the landscaping for such a feature provided there was no adverse impact on the damp grassland in the valley
7. The planning authority should insist that the developers comply fully with all aspects of their affordable housing provisions as set out in West Berkshire Council's Planning Obligations SPD December 2014 in every respect.

# Sandleford Ancient Woodlands

## APPENDIX 1.

Ancient Woodland circled in green, additional woodlands on site in pink.





**LEGEND**

- Application boundary
- Proposed development footprint
- Existing woodland to be retained
- Existing local wildlife sites (LWS) to be retained
- Existing ancient woodland to be retained (Note 2)
- Existing trees to be retained
- Existing trees to be removed
- Proposed structure and woodland planting
- Proposed advanced structure and woodland planting
- Proposed tree planting reflecting historic vegetation pattern
- Proposed community orchard planting
- Existing hedges to be retained
- Existing hedges to be removed
- New or reinforced hedge planting
- Existing watercourse
- Existing attenuation pond / dry / wet
- Proposed SuDS attenuation basin
- Amenity grassland including informal kickabout / picnic areas
- Meadow grassland
- Wet meadow grassland
- Informal route, e.g. mown grass path
- Main path route: 2m wide / sealed surface
- Existing track / footpath to be retained
- Dedicated recreational route: 2m wide e.g. gravel bark (no dig construction)
- Sandford Mile
- Foraging trail
- Trim trail
- Interpretation board / map of country park
- Designated equipped play area
- Natural play trail
- Vantage points with seating
- Access crossing and Bat hopover
- Main access route with avenue planting
- Pedestrian access links

Scale: 1:25000  
© Geomapping plc

**Notes:**  
1) Gorse Covert and Bricklin Copse are not designated ancient woodland.  
2) Ancient woodland areas retained with 15m buffer.

Other labels on the plan include: Newbury Rugby Football Club, COUNTRY PARK CENTRAL VALLEY, COUNTRY PARK NORTHERN VALLEY, HIGHWOOD COPSE PRIMARY SCHOOL SITE, CONSENTED NEWBURY COLLEGE EXTENSION, LINK ROAD, REPTILE RECEPTION SITE, and various LEAP and NEAP areas.



15 metre buffer (NE standing advice minimum)





## 30 metres (BBOWT)





# 50 metres (Woodland Trust)



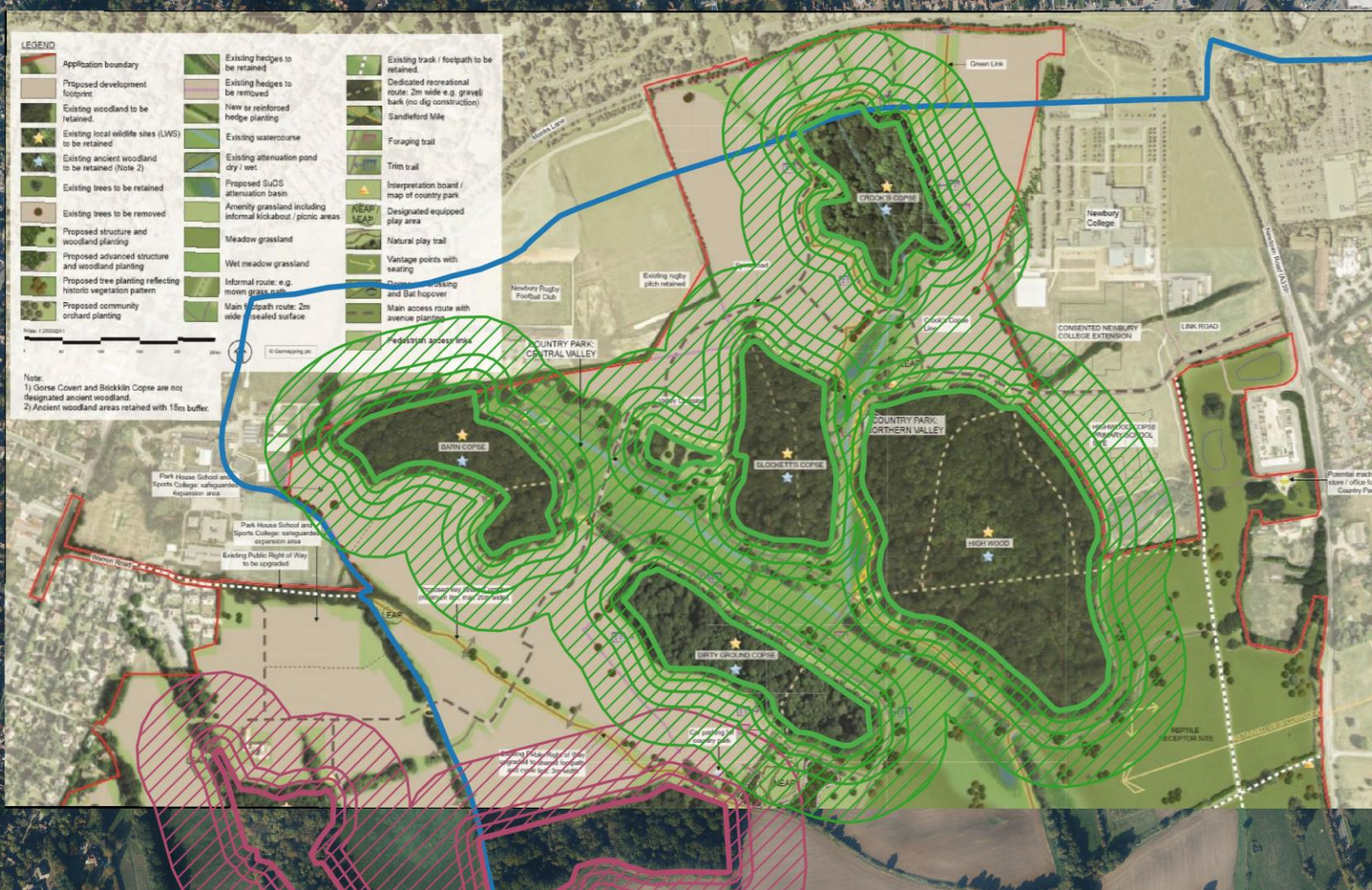


100 metres





# 100 metres for all woodland





## **NPPF**

“Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”

## **Natural England and Forestry Commission Standing Advice**

"You should refuse planning permission if development will result in the loss or deterioration of ancient woodland, ancient trees and veteran trees unless:

- there are wholly exceptional reasons
- there's a suitable compensation strategy in place"

"For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage. Where assessment shows other impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.

"It should consist of semi-natural habitats such as woodland, a mix of scrub, grassland, heathland and wetland planting" (Avoid gardens, SUDs)

## **Impacts of Nearby Development on Ecology of Ancient Woodland (Woodland Trust 2008)**

### **Many problems stem from unmanaged access**

- Frequency of fly-tipping into woodland
- Dumping of garden waste into woodland leading to local nutrient enrichment.
- Trampling of plants, chronic disturbance negatively impacting on habitat use, foraging opportunities and breeding
- Relocation or removal of timber (Deadwood), vandalism of trees.
- May lead to reductions in species diversity and abundance or elimination from the wood.

### **Other issues may include**

- Gardens – beneficial (bird feeding) but also increased predation
- Escape of invasive plants or dumping in woodland. Nutrients and light/shade.

## Impacts of Nearby Development on Ecology of Ancient Woodland (Woodland Trust 2008)

### Mitigation: Planted Buffers

"Locating development further away from ancient woodland will reduce associated disturbance. The minimum distance over which this is likely to be effective will depend on the type of development, the nature of disturbance, and the local context, including intervening land use, vegetation and topography."

"The scale of woodland buffers should be tailored to individual developments and anticipated levels of disturbance but **should be at least 50-100m wide** (Huisman & Attenborough 1991; Matlack 1993; Thiel et al. 2007). The addition of fencing to exclude access to both the area of new planting and the ancient woodland is likely to enhance the protective nature of this area, if public access is unmanaged. Where public access is granted, path maintenance is recommended, in order to channel access, particularly away from sensitive areas (Matlack 1993)."

# Ancient Woodland Buffer Size

## Impacts of Nearby Development on Ecology of Ancient Woodland (Woodland Trust ADDENDUM 2012)

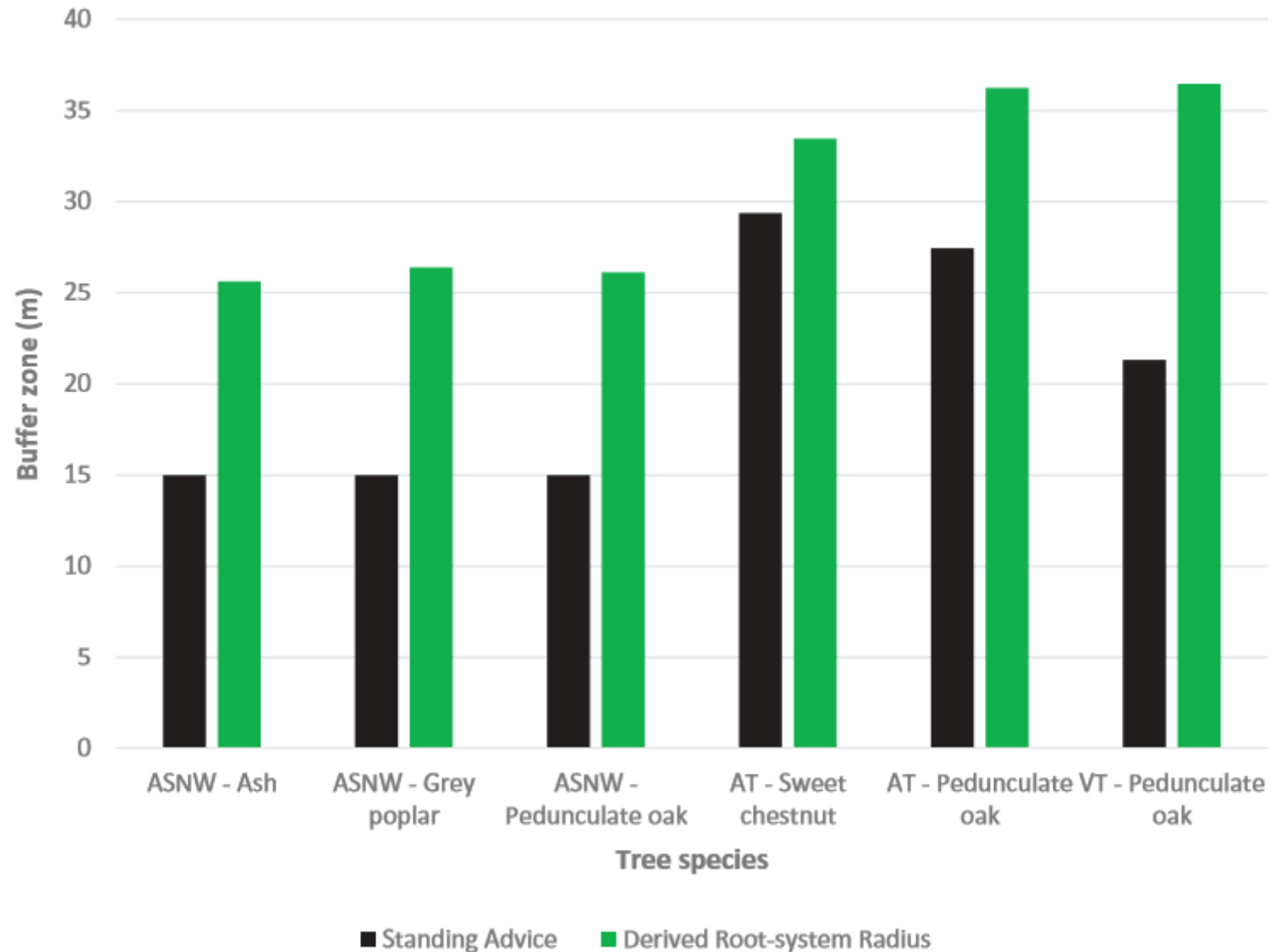
Table 3 Buffer Zones

Size of buffer	Reason for buffer	Reference
15m (minimum)	To protect woodland from the effects of development such as run-off, noise, damage to tree roots etc. There is no discussion about how the figure of 15m was reached. (UK)	Standing Advice for Ancient Woodland, Natural England, 30 May 2012 (taken from Bolnere Village appeal decision 2007)
50m	To protect woodland from encroachment activities from adjacent housing, such as waste disposal, garden extension. This paper specifies that the buffer should be wooded. (Canada)	McWilliam <i>et al.</i> (2010)
100 – 200m	To protect plant species from the effects of vehicle emissions from roads (UK).	Keely <i>et al.</i> (2008)
300m	To protect woodland bird species from the effects of roads (Spain).	Palomino and Carrascal (2007)
400m	To protect woodland bird species from the effects of urban development (Spain).	Palomino and Carrascal (2007)
?	Lightly wooded buffer around existing woodland to protect the core from impacts of development (UK)	Merkx <i>et al.</i> (2012)

# Ancient Woodland Buffer Size

**Andrews et al 2019 (Arboricultural Journal)**

Compares standing advice buffer zones to actual root system size



## Planner's Manual for Ancient Woodland and Veteran Trees (2019)

"Impacts on irreplaceable habitat always results in net loss. These impacts cannot be offset elsewhere. Where ancient woodland or veteran trees are lost or damaged there will always be net loss of biodiversity and it is impossible to secure net gain"

Mitigation to include:

- Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met"

## Provide adequate buffers

A buffer is a landscape feature used to protect a sensitive area from the impact of disturbance both during and after construction. A buffer may:

- Go around the whole area to be protected, or just along one edge
- Be planted with trees or shrubs, or it could be an area of land that the development is not allowed to encroach upon, e.g. a grassy strip
- Also contain man-made structures such as fences, walls and earthworks (though it must not contain Sustainable Drainage Systems which could impact on the hydrology of the ancient woodland)

Although there is no 'one size fits all' with buffer design, each one should be designed to fulfil the specific requirements of its location and the type of proposed development.

As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

The preferred approach is to create new habitat, including native woodland, around existing ancient woodland. This will help reverse the historic fragmentation of this important habitat. The consequent increase in ecological connectivity between areas of ancient woodland will create the resilient landscapes recommended in *Making Space for Nature* published by Defra (2010)<sup>21</sup>.

## Case study

### Provide 50 metre buffers

Reffley Wood – *King's Lynn and West Norfolk Council Site Allocations and Development Management Policies* (2016).

During the consultation process on their Local Plan, King's Lynn and West Norfolk Councils agreed that a 50 metre buffer was needed to protect ancient Reffley Wood from the impacts of future housing development. They continued this approach in their site allocations and development management policies (see Policy 4.1) when they allocated the neighbouring Knights Hill site.

This policy was applied in a subsequent planning application for a major housing scheme (reference: 16/02231/OM) that accepted and included a 50 metre buffer in its proposals. This shows the value of strong, effective planning policies in delivering real protection for ancient woodland and providing improved biodiversity and recreational opportunities as part of a scheme.

## Case study

### Provide 100 metre buffers

The *Wiltshire Core Strategy*<sup>22</sup>, adopted in January 2015, sets out various requirements for proposed development for the Ashton Park Urban Extension, south east of Trowbridge. On page 354, at the beginning of the section on ecology, it identifies the need for:

*"100m woodland/parkland buffer between all ancient woodland, including Biss Wood and Green Lane Wood, and built development."*

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22 Wiltshire Council. (2015). *Wiltshire Core Strategy*. Available at: [www.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf](http://www.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf)

## Comments on 2018 application from Bloor:

### Natural England:

"Although the minimum size of a buffer zone should be at least 15 metres, **Natural England would expect this to be significantly larger for a development of this nature and size.** The proposed design of the development in surrounding the ancient woodland, would also make a larger buffer suitable.....management of the ancient woodland, including monitoring for potential damage, should be included in the proposals."

Proposed buffer remains at 15 metres in the new application



## Comments on 2018 application from Bloor:

### BBOWT:

"It is considered that a **buffer of greater than 15m would be appropriate for the ancient woodland on this site and that a buffer of 30m would be appropriate in areas where the ancient woodland is immediately adjacent to the built development.....**

We therefore recommend that a buffer zone of greater than 15m should encompass all ancient woodlands within this site and **a buffer zone of 30m should be imposed at points where the ancient woodland is immediately adjacent to built development.**

If this development were to proceed **with the currently proposed 15m buffer zone,** it is likely that these ancient woodlands will deteriorate for the reasons stated above **and the Council will fail to meet its statutory obligations under the Natural Environment and Rural Communities Act (2006)\* and will fail to meet the policy objectives of both the NPPF and West Berkshire Core Strategy."**

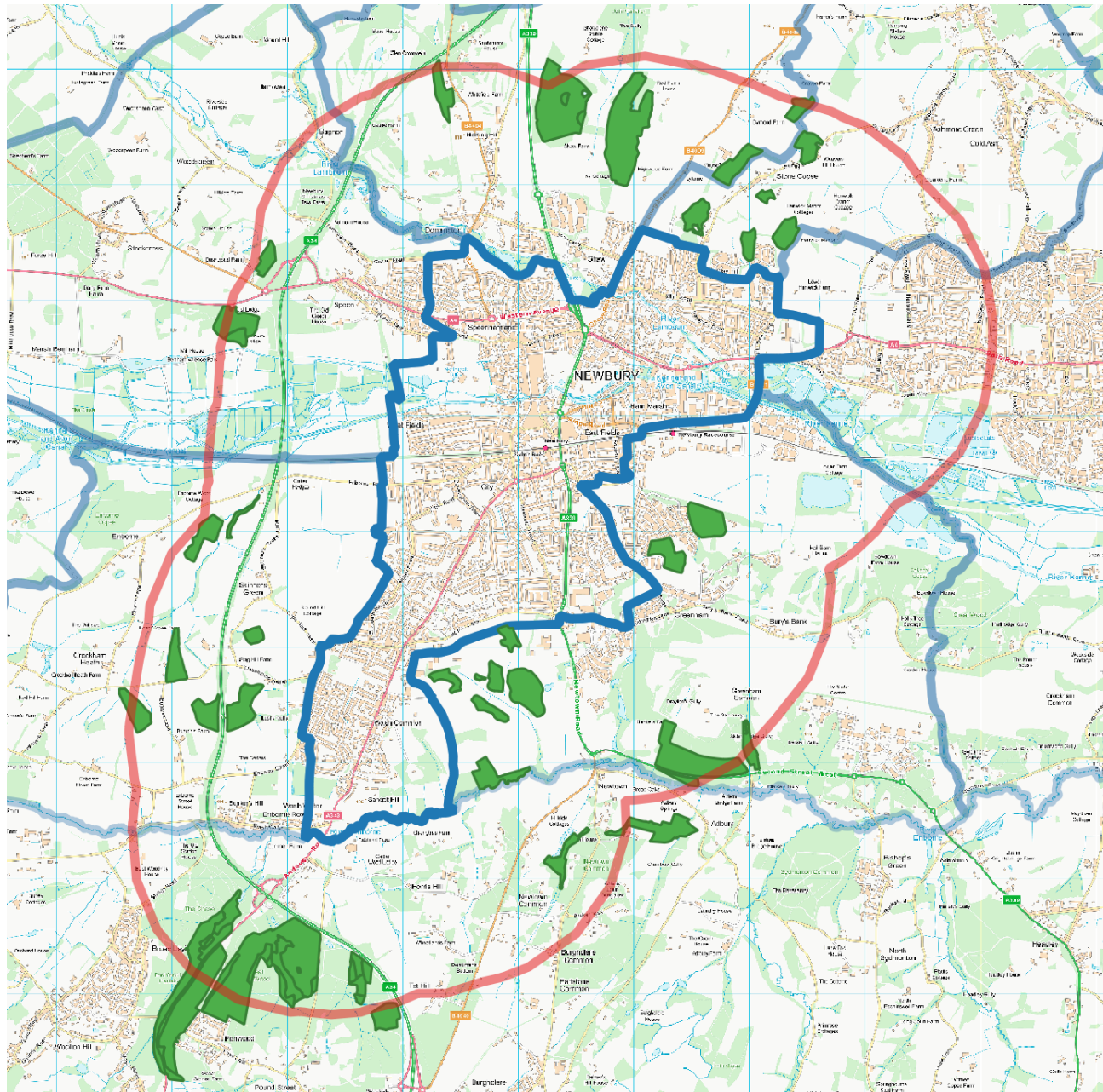
## West Wood, Greenham

The adjacent new development borders ancient woodland with a 15 metre buffer of apparently poor quality.



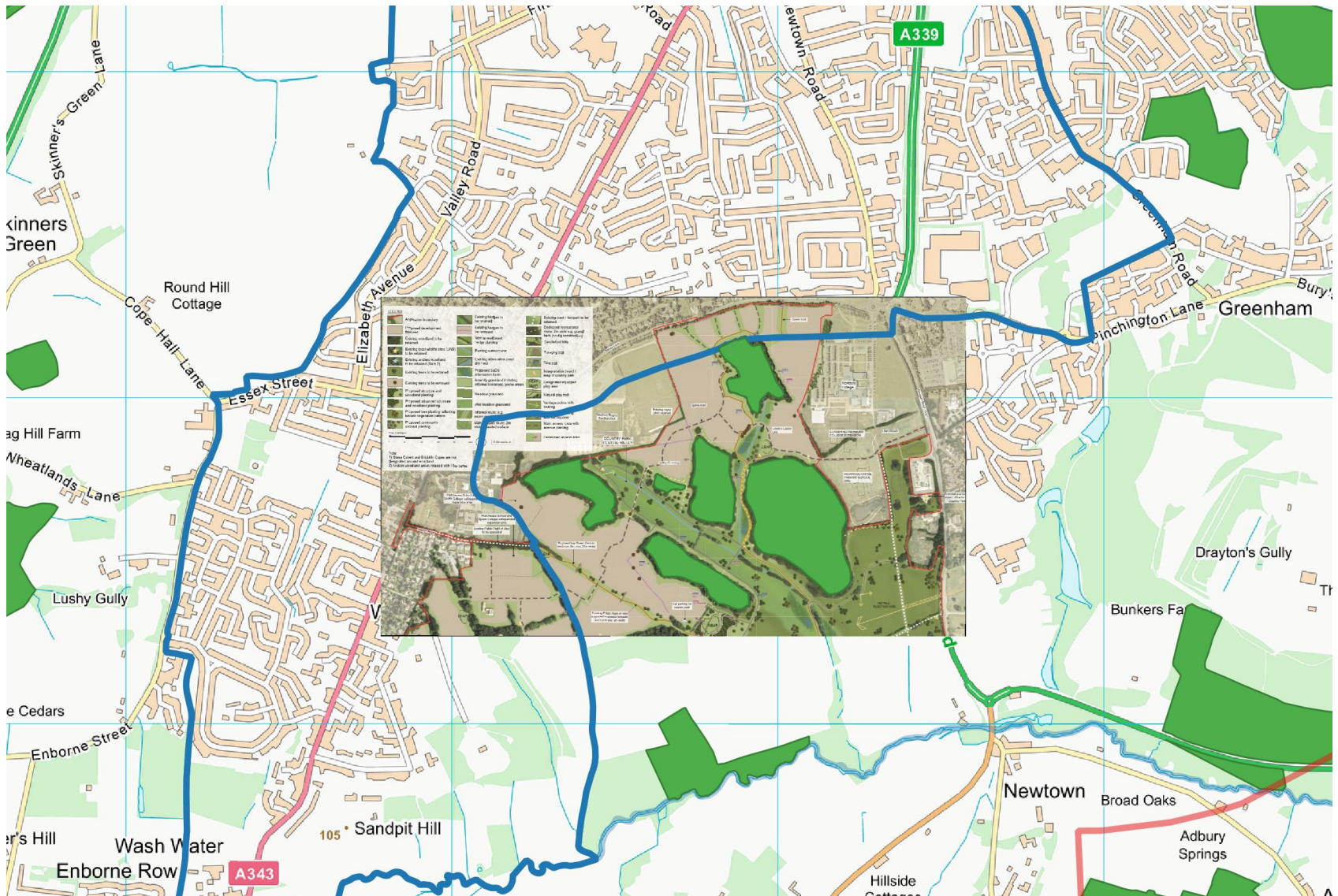


# Newbury ancient woodland network (dark green)





## Sandleford 'Green Infrastructure' plan (submitted by Bloor) in context



## Ancient Woodland Mitigation

- Fenced 15 metre buffer zones
- Holly management to improve habitat
- Dead wood left in situ 'minimum amount removed concordant with public safety'
- Footpaths 'largely follow existing tracks' and to be mapped for reserved matters apps
- Boardwalks in wet areas (see next slide/page)
- 'Not considered that ancient woodland indicators will be impacted as they are located along existing tracks'
- 'Areas cleared of bramble and sycamore' (some bramble is beneficial for nesting and nectar)
- Information boards and possibly fencing
- Monitoring of bluebell populations. **"No further monitoring is proposed"**.



## Wykery Copse Bracknell

Woodland with low fence and 15 metre buffer to development. One path across is boardwalk for the complete length. Discourages access to the remainder of the wood.





## CF Additional Comments

- A long grass meadow will be established in the country park primarily to benefit reptiles, considers deterring birds during establishment, possibly including netting:
  - Two skylark plots in arable field – but they will try to nest in meadow!
  - Currently 4 + skylark territories on development fields (personal observation) and other ground nesting species such as lapwing vulnerable to disturbance.
- “New buildings will provide additional nesting locations for species, such as swifts”  
New builds would require nest boxes to attract swifts. Proposed nest box provision is extraordinarily small considering the number of proposed houses for humans....

### 4.7.4 Post-construction Enhancements

Additional enhancements for nesting birds will include the following (refer to Appendix C for specifications). Illustrative locations are provided within Figure 3.

- Installation of two skylark plots (16-24m<sup>2</sup>) which will be left unsown in winter cereals to boost the nesting opportunities and food available for skylarks.
- Installation of 25 starling nest boxes and 10 house sparrow nesting boxes / terraces incorporated onto proposed buildings.
- Installation of eight nesting boxes with a variety of hole sizes from 25mm to 35mm – these will be suitable for a range of bird species.
- Installation of eight open fronted bird boxes, which will be used for species such as robins, spotted flycatchers and pied wagtails.
- Installation of eight wedge shaped nest boxes, which will be used for species such as treecreeper.

## Positive Commitments:

- There is general recognition in the management plan of the importance of rank vegetation (often seen as undesirable) as invertebrate habitat, allowing herbaceous vegetation to grow around planted hedges and shrubs etc
- (But how long will this last before residents put pressure on management company to keep the place 'tidy'?)
- Maintenance of good quality wet grassland habitat in the valley with adjacent woodland edges

## Queries

- Some targeted management for invertebrates is proposed but **no monitoring recommended**, including of species associated with the ancient woodland, so it will not be possible to determine whether mitigation has worked.



# Ecological Mitigation and Management Plan (Appendix F18)

“Mitigation to include: Implementation of an appropriate monitoring plan to ensure that proposed measures are effective over the long term and accompanied by contingencies should any conservation objectives not be met”  
(Woodland Trust Planners Manual)

## 6.0 Monitoring

**Table 3: Monitoring summary**

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15
Monitoring of reptile population if required (October)							
Monitoring of dormouse population (twice a year)							
Monitoring to confirm absence of invasive species							
Monitoring of the existing bluebell populations (April to early May)							
Monitor the establishment of the orchard for 15 years							
Meadow habitat – monitored once a year in July							
Monitoring of Himalayan balsam stands							

An annual monitoring summary will be compiled and will include suggestions and justification for proposed modifications for monitoring if necessary.

At the end of the 15 year period, a reassessment of the management plan will be made.