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24<sup>th</sup> July 2020

Jake Brown  
Case Officer  
West Berkshire Council  
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**By email only**

Dear Jake,

**Application ref:** 20/01238/OUTMAJ  
**Address:** Sandford Park, Newtown Road, Newtown, Newbury

Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on the above referenced planning application at Sandford Park. As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of biodiversity in and around the proposed development.

BBOWT has commented on the previous application (18/00764/OUTMAJ) at this site by the same applicant in a letter dated 8<sup>th</sup> June 2018. We welcome the additional information that has been submitted in the new application, but there remain significant ecological issues with the proposal which we address below.

**Impact on Greenham Common SSSI**

- **Recreational impact mitigation required**

We have been unable to locate any information seeking to address the recreational impact on Greenham and Crookham Commons SSSI likely to result from the increased local residential population as a result of this development.

The proposed country park may absorb some of the recreational needs of the new local population but it is expected that residents will still seek to visit the SSSI on a regular basis because it is only a 400m walk away from the application site and is over twice the size of the entire Sandford Park application site (SSSI = 280ha, application site = 114ha), and thus offers a significant amenity attraction to residents.

We request the applicant opens a dialogue with this Wildlife Trust regarding appropriate measures to secure the conservation features of the SSSI in light of increased visitor pressure. This is in line with the requirements of Council Core Strategy paragraph 5.16, which supports Policy CS3 for this allocation, stating that development near to the SSSI “will be expected to mitigate against increased recreational pressure”.

## **Impacts on Brick Kiln Copse Local Wildlife Site**

- **SUDS**

The Combined EMMP Principles (ES Vol 3 Appendix F19) state in 3.1.1 that the SUDS for Sandford Park West will be located within Brick Kiln Copse Local Wildlife Site (LWS). Further clarification is needed to explain how the location of new SUDS features within the woodland will not impact on the existing biodiversity value of the habitat.

- **Semi-natural buffer**

The Combined EMMP Principles (ES Vol 3 Appendix F19) state that there will be a minimum of a 15m semi-natural habitat buffer around all ancient woodlands on the site with the exception of the north east section of Brick Kiln Copse LWS. According to statutory guidance, a 15m buffer is a minimum requirement but larger buffers are encouraged where the receptor is of particular quality and/or sensitivity and depending on the type of impacts being mitigated.

Brick Kiln Copse is priority habitat and also designated as a Local Wildlife Site with more ancient woodland indicator species recorded than all except one of the ancient woodlands within the application site. It is thus of high quality and sensitivity.

With a reduced buffer, significant impact on this Local Wildlife Site is to be expected. A clear explanation of how impact to this priority habitat will be avoided is required and how residual impact is to be adequately mitigated.

## **Impacts on ancient woodlands**

- **Semi-natural buffer**

It is proposed that semi-natural buffers of 15m are retained around all ancient woodlands (ES Vol 1 Chapter 6 para 6.5.1) but this is the minimum recommended width of buffer and in many cases larger buffers are needed. No evidence has been provided as to why a 15m buffer (the recommended minimum as per statutory guidance) is considered adequate in this case.

## **Impact on River Enborne**

- **Contradiction between ES and Illustrative Plan regarding access**

We welcome the statement in ES Vol 1 Chapter 6 (page 6-42) that there will be no post-occupation access to the River Enborne or Waterleaze Copse LWS. However the Illustrative Layout clearly still shows a footpath accessing the river and the peripheral footpath alongside Waterleaze Copse and we can locate no proposals for access barriers.

This suggests that once the country park is operational and receiving visitors, there will be no means of preventing access to these two sensitive receptors. Clarification is therefore required on how access will be prevented to the River Enborne and Waterleaze Copse.

## **Hazel Dormouse**

- **Securing HD population in Barn Copse**

The proposed layout does not show any arboreal (tree canopy) connectivity between Barn Copse and the other copses in the woodland complex on site. Given the hazel dormouse population present within Barn Copse and the risk of harmful impacts on the population from construction and occupation, reinstating connectivity to wider available habitat is essential prior to construction works

starting. Note that this connectivity may need to be in the form of an artificial 'aerial bridge' over the proposed road at least until canopy growth of any planted trees is sufficient to ensure connectivity. Further detail on this is required.

- **HD records within 2km of development**

The statement in ES Vol 1 Chapter 6 (page 6-16) that there are no records of hazel dormouse within 2km of the application site is incorrect. There are records of the species from 2015 well within the 2km zone.

## **Biodiversity enhancement**

- **Biodiversity net gain**

We welcome the submission of an objective assessment of net biodiversity gain using the Warwickshire Coventry and Solihull metric. There appear to be some omissions in the metric such as no record of an impact on running water and marshy grassland, yet there is a proposed road bridge across these habitats with the proposed loss of 0.03ha of habitat (ES Vol 1 Chapter 6 page 6-19).

Generally the calculations appear to reflect the overall balance of habitat impact although there remain biodiversity impacts that need to be specifically addressed for this scheme to be policy compliant as detailed above.

It is also unclear how biodiversity net gain will be dealt with on the related Sandleford Park West scheme, if/when that comes forward, since much of the net gain attributed to the present application arises from the country park habitat enhancements. No such equivalent area of biodiversity enhancement appears to be proposed for Sandleford Park West, and it would be helpful to understand how the two schemes will deliver holistic biodiversity net gain on this allocation.

- **Country park access management**

We are unable to locate any reference to an access management plan for the country park. This is essential in order to understand how people move around the development and country park with the least impact on wildlife. Using one example to illustrate, it is intended that footpaths will be located 30m from barn owl nesting boxes (ES Appendix F19 Combined EMMP para 4.8.3), but there is no reference to additional measures to restrict access to barn owl nest sites which are notoriously sensitive to disturbance.

There also does not appear to be any reference to wardening the proposed Country Park. Wardening the proposed Country Park is essential in order to ensure that the country park meets the needs of the new local residents, and meets its objective of helping to draw new residents away from the SSSI and helps avoid damage to the SSSI through increased local visitors.

Given that there is also still no evidence provided by the applicant that attempts to quantify the possible harmful impacts of increased visitors on Greenham Common, it is still not known what mitigation will be required to avoid such adverse impacts of the increased local population on this SSSI.

- **Country park grassland management**

There are several references to the proposed management of the newly created country park grassland through hay cut or grazing. It is not clear how a viable hay crop will be produced from an area frequented by dogs (i.e. it is likely to be contaminated) and we maintain that the most appropriate habitat management here for maximising biodiversity benefit is a grazing regime.

We would welcome dialogue with the applicant and Council regarding the proposed management of the country park in advance of determination in order to ensure that proposals are viable and serve their purpose to maximise biodiversity gains within the country park and deflect visitors from the nearby SSSI.

Please contact me if you require any further information or clarification of these comments.

Yours sincerely,

**Sam Cartwright PhD MCIEEM**  
**Senior Biodiversity and Planning Officer**