



APP10 Proof of Evidence

Land at Sandford Park, Newbury

Chris Alder MSc HNDArb FARborA MICFor RCarborA

APP10 - 14281-AppealProof-CA-FINAL

LPA reference: 20/01238/OUTMAJ

PINS reference: APP/W0340/W/20/3265460

1st April 2021

1. QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Chris Allder and I am an Associate Director and consultant with Barrell Tree Consultancy, an arboricultural consultancy practice based at Field House, Fordingbridge Business Park, Ashford Road, Fordingbridge, Hampshire. I am a Chartered Forester (www.charteredforesters.org) and a Fellow and Registered Consultant of the Arboricultural Association (www.trees.org.uk). I hold a Master of Science Degree in Resource Management (Arboriculture) from Middlesex University (2003), and a BTEC Higher National Diploma in Arboriculture from Durham College of Agriculture and Horticulture (1994). I have taken and passed the LANTRA Professional Tree Inspection course (2007) and refresher (2016). I act as an arboricultural consultant dealing with all aspects of urban tree management and have experience in dealing with trees and woodlands in the planning system.
- 1.2 I have been working with trees since 1989, starting out on a large estate gaining valuable practical experience of estate forestry, woodland and vegetation management. In 1992 I embarked on the Higher National Diploma at Durham College of Agriculture and Horticulture and, on graduating in 1994, took up the post of Assistant Tree Officer at East Dorset District Council, primarily employed to review tree preservation orders. I then moved to North Dorset District Council as the Trees and Landscape Officer where I had responsibility for protected trees, planning related issues and council-owned trees. After four years, I moved to ADAS to take up the role of Lead Arboricultural Consultant within a multi-disciplinary team of ecologists, surveyors, soil and water engineers, and wildlife consultants. At ADAS, I worked with ecologists as part of a project team to provide solutions to a wide range of landowners in relation to infrastructure and development planning. Although focusing mainly on tree risk related issues, I also had experience of managing large scale tree surveys and resolving conflicts between utility/transport providers and tree owners. I was a main author of the DCLG research publication Trees in Towns II. Whilst working at ADAS, I completed my Master of Science Degree from Middlesex University. I joined Barrell Tree Consultancy in February 2008, bringing my varied experience to this specialist practice. I currently provide arboricultural advice in relation to planning and development issues and was appointed Associate Director in December 2020.
- 1.3 I ensure that I keep professionally current through attendance at courses, seminars and conferences. I regularly present continuing professional development to clients, architectural practitioners, urban designers, landscape architects, engineers and other arboricultural professionals.

2 INSTRUCTION & SUMMARY

2.1 I have been instructed by Bloor Homes Limited to provide a Proof of Evidence relating to the Appeal and Public Inquiry ref: APP/W0340/W/20/3265460, concerning the decision by the West Berkshire District Council (WBDC) to refuse the planning application on land at Sandlesford Park, Newbury.

2.2 An Outline planning application ref: 20/01238/OUTMAJ was submitted to the Local Planning Authority (LPA) on the 28th May 2020 for the following proposed development:

The construction of up to 1,000 new homes; and 80 extra care housing units (Use Class C3) as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150 sq m, B1a up to 200 sq m) and D1 use (up to 500sq m); the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works.

2.3 The application was refused on the 13th October 2020. Several of the reasons for refusal (8, 9, 10, and 13) relate to arboricultural matters.

2.3 I was the principal author of the original Arboricultural Assessment and Method Statement and Tree Protection Plans and have visited the site three times during the course of my instruction.

2.4 A tree preservation order (TPO) dated 23rd September 2020 was served by the LPA, and specified 18 woodlands for protection. Representations by Mr O Jones, LRM Planning were submitted for consideration by the LPA. The provisional TPO is considered to be inappropriate due to the inclusion of areas of trees and hedges as woodlands, that are evidently not woodlands. We await the outcome of the LPA's consideration of these representations.

2.5 I can confirm that the evidence which I have prepared and provide for this Inquiry is true and I confirm that the opinions expressed are my true and professional opinions.

3 SCOPE OF EVIDENCE

3.1 My evidence will consider the following elements:

- a. The submitted arboricultural information, tree loss, their impact on local character, and quality of proposed mitigation
- b. Reference to WBDC tree related policies
- c. Review of the tree related reasons for refusal
- d. Conclusions including Matters in Dispute

3.2 I will refer to the following Core Documents:

- 1: British Standard 5837:2012 Trees in relation to design, demolition, and construction – Recommendations (CD12.2)
- 2: Arboricultural Assessment and Method Statement reference 14281-AA8-CA, and Tree Protection Plan reference 14281-BT13a-f
3. Draft updated Arboricultural Assessment and Method Statement reference 14281-AA9-CA-DRAFTforInquiry, and updated Tree Protection Plan reference 14281-BT14a-f.
- 4: Consultation comments of LPA tree officer. Undated and unnamed.
- 5: NPPF Guidance. Ancient woodland, ancient trees and veteran trees: protecting them from development. www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resport

4 SUBMITTED ARBORICULTURAL INFORMATION

- 4.1 I prepared an arboricultural impact assessment and method statement report ('The Report') and tree protection plan (see Appendix 2) using the Land Use and Access Parameter Plan reference 191211-14-273-3A (PP02 Rev1) provided to me by the planning consultants on the 11th December 2019. This plan formed the basis for my tree protection plan reference **14281-BT12a-f**. Due to the access from Monks Lane not being entirely clear on this plan, I was asked to update the tree protection plan by the planning consultant to clarify the trees to be removed along the Monks Lane boundary. The plan reference for this update is **14281-BT13a-f** and accompanying report **14281-AA8-CA** dated 9th October 2020.
- 4.2 This arboricultural assessment report provides sufficient information for the Local Planning Authority (LPA) and now the inspector to consider the effect of the proposed development on local character from a tree perspective. It is fully compliant with the BS 5837 advice relating to the planning application stage of the process and it meets national standard planning application validation requirements.
- 4.3 The proposed outline development as set out in the parameter plan was judged to require the removal of the trees as described in Table 1 on page 3 of 'The Report'. I include an extract of the table below with an added row to show the total trees to be removed in each category:

		British Standard 5837 Category		
		A (High quality)	B (Moderate quality)	C (Low quality)
Remove	T34, T76, T199	T1, G16, G17, T18, T19, T35, G51, T63, T64, T65, T69, G110(part), T178, T179, T185, T186, T187	T2, H5(part), G6(part), H7, G36, G37, G47(part), H60, G68(part), W73(part), G108(part), H115(part), G117(part), H169(part), T180, T182, T183, H200(part), T218, T219, T220, G223, T225, T226, T227, T228, T230, T231, T232, T225, T226, T227, T228, G234(part), T246, T247, G248 (part)	
Total	3no. trees	13no. individual trees 3no. groups of trees Part of 1no. group of trees	19no. individual trees 4no. groups of trees Part of 7no. groups of trees 2no. hedgerows Part of 4no. hedgerows Part of 1no. woodland	

- 4.4 A further eleven trees (**T61, T109, T116, T127, T151, T154, T172, T173, T184, T191 and T196**) were identified with significant defects that they should be classified as 'U' and be subject to management to reduce any risk of failure.

- 4.5 Trees **T1, T2, T178, T179, T180, T182, T183, T185, T186, T187, T199, and H200(part)** are shown to be removed as part of the widening works originally proposed for the Warren Road access. This is no longer part of this application and these trees should not be included within the impact assessment.
- 4.6 Ongoing discussions within the project team concerning the management of veteran trees, alignment and design of the Valley Crossing, and Park House School extension has altered the number of trees that would need to be removed.
- T34:** This tree can be retained if the Park House School land extension is moved east, and the configuration of the land uses is altered as set out in the evidence by IDP.
 - T76:** The ongoing design work for the Valley Crossing now ensures this tree will be retained.
 - Veteran Trees:** The Ancient Tree Inventory identifies the following trees on the Appeal Site: **T1, T31, T33, T34, T127, T128, and T133**. None of these trees are required for removal. **T127** which is in advanced decline and has significant decay will be managed to make it safe, but retained.
- 4.7 To assist the Inspector a revised schedule of trees proposed for removal is shown below, and forms the basis of an updated report (**14281-AA9-CA-DRAFTforInquiry** and tree protection plan **14281-BT14a-f**) which takes into account the ongoing design of the valley crossing, school extension, and veteran tree management.

British Standard 5837 Category			
	A (High quality)	B (Moderate quality)	C (Low quality)
Remove	None	T63, T64, T65, T69	H5(part), G6(part), H7, T8, G10, G47(part), H60, G68(part), W73(part), G108(part), H115(part), G117(part), H169(part), T218, T219, T220, T221, G223, T225, T226, T227, T228, T230, T231, T232, G234(part), T236, T246, T247, G248(part)
Total	None	4no. individual trees	14no. individual trees 5no. groups of trees Part of 7no. groups of trees 2no. hedgerows Part of 2no. hedgerows Part of 1no. woodland

- 4.8 Of the eleven Category U trees **T61 has fallen over and needs to be cleared away. T109, T116, T154, and T184** are dead. **T127** will be managed to retain it in a safe state. **Trees T151, T172, T173, T191 and T196** have significant defects but will be subject to management to reduce any risk of failure.
- 4.9 The four moderate quality Category B trees (**T63, T64, T65 and T69**) to be removed are located in the central area of the site, and their loss will be buffered by the retention of

adjacent trees. The loss of these trees will not have a detrimental impact on the arboricultural character of the area.

- 4.10 The low quality Category C trees to be removed are generally small and of poor condition. The trees along the Monks Lane boundary (**G117(part), T218, T219, T220, T221, G223, T225, T226, T227, T228, T230, T231, T232, G234(part), T236, T246, T247, and G248(part)**) that will need to be removed for the main access are visible from the public highway, and their loss will be noticeable in the short term. However, these trees constitute a belt of amenity planting which can be reasonably replaced with new high-quality planting. There will be no long-term loss of amenity through the removal of these trees.
- 4.11 Several of the woodlands are classified as Ancient semi-natural woodlands (ASNW) which affords them protection as important habitats. These woodlands are referenced in The Report as:
- a. **W62** Dirty Ground Copse. A mixed deciduous woodland of oak, ash and sycamore with a holly dominated understorey, grass ground cover and birch regeneration.
 - b. **W72** Barn Copse. A mixed deciduous woodland of oak, ash and sycamore with a holly dominated understorey and occasional regeneration.
 - c. **W90** Slockett's Copse. A mixed deciduous woodland of oak, sycamore and birch, with a holly understorey.
 - d. **W97** High Wood. A mixed deciduous woodland of oak, ash, sycamore and birch with a holly understorey.
 - e. **W112** Crooks Copse. A mixed deciduous woodland of oak, birch and sycamore with a holly understorey.
 - f. **W161** Waterleaze Copse. A mixed, wet, linear deciduous woodland of oak, alder and sycamore with a holly understorey.
- 4.12 **W13** Brickkiln Copse is a mixed woodland but not subject to ASNW status. **W55** Gorse Covert is a mixed woodland, and whilst listed as a local wildlife site, is not subject to ASNW status.
- 4.13 None of the woodlands are detrimentally affected by the proposed development. In accordance with the provisions of the National Planning Policy framework and its published guidance, the woodlands have been afforded a minimum 15m buffer zone where no development will be permitted. The Ecology evidence will demonstrate the amount of woodland boundary adjacent to the proposed development.
- 4.14 All the high category trees and woodlands will be retained and protected in this proposal. The majority of trees to be removed are well within the site, and are close to retained trees that will buffer the initial impact, and their loss will have no significant impact on the

present character of the area. There is plenty of space for tree planting and a comprehensive new tree planting scheme is included as part of the proposal. The size of these new trees and their future growth will significantly enhance the contribution of this site to local character and more than compensate for the loss of existing trees. The construction activity may affect further trees if appropriate protective measures are not taken. However, if adequate precautions to protect the retained trees are specified and implemented through the arboricultural method statement included in this report, the development proposal will have no long-term detrimental impact on tree health or the contribution of trees to character in the wider setting.

- 4.15 In my professional opinion both the submitted tree report, and the updated revision provides a full and detailed analysis of the issues, complies with BS5837:2012, and demonstrates how the retained trees can be protected during construction without detrimental impact on their health or diminution to their contribution to the character of the area.
- 4.16 In my professional opinion the proposed loss of trees will not have a long-term detrimental impact on the character of the area. There is substantial scope for new, high quality tree planting which will be of considerable benefit to the local amenity.

5. REVIEW OF LPA TREE OFFICER'S COMMENTS

- 5.1 I have reviewed the comments of the LPA tree officer, which stretch to some 13 pages. Much of the comments relate to matters that are not arboricultural, and I shall comment only on those matters within my area of expertise.
- 5.2 Reference is made to the Sandleford SPD, section L4 which relates to the retention and protection of important trees, hedgerows and woodlands. It states that setbacks (buffer zones) from woodland are defined as being 15m when measured from the centre of trees on the edge of woodland. The NPPF guidance states that there should be a buffer zone of at least 15m for ancient woodlands, but doesn't specify where to measure the 15m from. Individual veteran or ancient trees have a buffer zone measured either 15x the stem diameter, or 5m beyond the edge of the canopy, whichever is greater.
- 5.3 Measuring a buffer zone from the closest trees along the woodland edge may lead to inaccuracy issues as over time trees may die, collapse, or be felled, and so it is generally accepted that buffer zones need to be measured from a fixed point, such as a fence, ride, ditch, bank, stream, road or crop margin, however, many of the woodland boundaries on this site do not have a fence or other clear physical demarcation. As such the 15m minimum buffers have been measured from the County Wildlife Site boundaries (which also coincide with the Ancient Woodland boundaries). In places, the proposed Construction Exclusion Zone exceeds the 15m minimum buffer, for example where veteran trees are located adjacent to but outside the woodland boundary.
- 5.4 Mr West's evidence on Ecology matters (specifically Appendix A) demonstrates that the parameter plan shows these minimum 15m buffers, but the SLGI plan incorporates buffers of variable width, with 91% of the total woodland edge greater than 15m. The final buffer positions will be defined as part of future Reserved Matters applications, informed by up to date evidence including tree surveys.
- 5.5 Under General Observations the officer states that the application is for Outline, but expects that full details of the proposed accesses should be submitted. As is normal for Outline application full details are usually dealt with via reserved matters. The officer continues to state that he would expect a Heads of Terms Method Statement to be included in the submitted report, which indeed is provided at Section 2.5, page 7 of my report. Yet the officer continues to state that he can find no specific details within the report.
- 5.6 The officer bemoans the new access road circumnavigating Crooks Copse and that it will leave the woodland isolated. The new access road is a requirement of the development through the SPD, but through careful design of the link road to the south of Crooks Copse, incorporating green links and corridors, any perceived isolation will be avoided and impact minimised.

- 5.7 The officer goes on to claim that having a key cycle/footpath within Gorse Covert will cause fragmentation of the woodland and is unacceptable. Installation of any new surfacing within a woodland will be subject to detailed design incorporating a carefully planned route to avoid trees, and will be of a no-dig and permeable specification.
- 5.8 The officer then sets out several matters that will cause future pressure on the woodlands. Domestic pets, recreation and trampling, health and safety, drainage and hydrology, and air pollution. No evidence is put forward to substantiate any of these issues, most of which are outside the officer's remit. I will leave relevant matters to my colleagues in ecology, drainage and air quality and their evidence. Removal of deadwood overhanging footpaths does not result in the loss of valuable habitat for wildlife. Most deadwood can be retained carefully as part of a sustainable and minimal intervention management regime which will be of benefit to local wildlife and the health of the woodlands.
- 5.9 In the unnumbered Summary the officer makes a series of observations, and concludes with a Recommendation which includes a reason for refusal.
- 5.10 The officer's observations overstate the impacts of the proposed development on the trees and woodlands. The submitted report and tree protection plan, plus my colleagues' work in drainage, landscape and ecology all demonstrate that future pressure on the ancient woodlands will not be a significant issue, and that through careful design and implantation the quality and integrity of the woodlands can be retained, and where possible enhanced through linkages of new planting.
- 5.11 Several hedgerows will need to be removed to facilitate the development, but significant new planting is proposed.
- 5.12 Buffer zones are shown in accordance with the guidance and no formal construction will be permitted within the buffer zones.
- 5.13 All new surfacing within RPAs, either of trees or woodlands will be carefully designed to be no-dig and permeable and follow the recommendations of BS5837:2012.
- 5.14 My colleagues in drainage will deal with the surface water runoff matters. My colleagues in ecology will deal with the relevant issues concerning domestic pets, bats and habitat.
- 5.15 Through ongoing design considerations I can confirm that no veteran trees and no category A trees will be affected by the proposals.
- 5.16 As set out in the latest draft arboricultural report produced in conjunction with the ongoing design work, just four moderate category B trees and a number of low-quality trees and hedges will need to be removed. Therefore, in accordance with the requirements of L4 of the Sandleford SPD, where possible, all important existing trees and hedgerows will be retained and integrated into the development. All areas of woodland including ancient woodland will be retained and protected.

6 REVIEW OF TREE RELATED REASON FOR REFUSAL

6.1 I have reviewed the relevant tree related sections of the quoted Council's policies; CS3 Sandleford Design Site Allocation, CS14 Design Principles, CS 18 Green Infrastructure, and CS19 Historic Environment and Landscape Character.

6.2 CS3 Sandleford Design Site Allocation states in relation to trees:

Two vehicular accesses will be provided off Monks Lane with an additional sustainable transport link for pedestrians, cyclists and buses provided from Warren Road onto the Andover Road:

6.3 In response, it is my view the council have accepted that there must be tree losses to accommodate the Monks Lane accesses. This can be mitigated by new planting which is dealt with through the landscape evidence.

6.4 CS3 Sandleford Design Site Allocation states in relation to trees:

Conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland:

6.5 In response it is my view that the ancient woodland will be retained and protected in accordance with the Government's standing advice concerning the use of buffer zones. The ecology evidence will further elaborate on this issue. CS14: Design Principles states in relation to trees:

New development must demonstrate high quality and sustainable design that respects and enhances the character and appearance of the area, and makes a positive contribution to the quality of life in West Berkshire. Good design relates not only to the appearance of a development, but the way in which it functions. Considerations of design and layout must be informed by the wider context, having regard not just to the immediate area, but to the wider locality. Development shall contribute positively to local distinctiveness and sense of place.

6.7 In response it is my view that the proposed developable areas pay proper regard to the existing trees and woodlands and provide for protection and retention following the national guidance.

6.8 CS14: Design Principles states in relation to trees:

Make efficient use of land whilst respecting the density, character, landscape and biodiversity of the surrounding area.

6.9 It is my view that the proposed outline application respects the trees and woodlands, provides space for their retention and protection both during and after development. Provision for new planting and habitat creation will be covered in the respective landscape and ecology evidence.

- 6.10 CS18 Green Infrastructure. This policy does not directly reference trees or woodlands, but refers to the wider notion of green infrastructure. As stated previously the application provides for retention and protection of the existing trees and woodlands, with the exceptions as noted in the tree removals table. The provision of green space, new planting and habitat will be dealt with by my colleagues presenting the planning, landscape and ecology advice. CS19 Historic Environment and Landscape Character, states in relation to trees:

In order to ensure that the diversity and local distinctiveness of the landscape character of the District is conserved and enhanced, the natural, cultural, and functional components of its character will be considered as a whole.

- 6.12 It is my view that the trees and woodlands which contribute to the wider landscape of the application site are retained and protected as shown on the submitted plans. A number of trees, as described in the tree removal table, must be removed to allow the development to be facilitated, but new planting, habitat creation and green space are all provided for through the proposals.

- 6.13 Reason for refusal No.8 states:

The application site includes a network of six ancient woodlands and one other woodland with a number of ancient indicators. All the trees on the site are the subject of a Tree Preservation Order (TPO 201/21/1016-W15-MIXED). In accordance with NPPF paragraph 175(c) ancient woodlands are irreplaceable habitats. Although the submitted documentation refers to the intended provision of 15m buffers to the ancient woodlands and 10m buffers to the other woodland, the proposals indicate that in certain instances works will encroach into the 15m buffers, as in the case of the sports pitch proposed to the south of Barns Copse, or the proximity of conveyancing channels and detention basins in relation to Dirty Ground Copse, Highwood and Slockett's, Copse, or the proposed cycle route and Grasscrete works in relation to Waterleaze Copse. The Planning Authority considers that notwithstanding the 15m buffers metric in Sandleford Park SPD, 15m buffers should be a minimum in accordance with Natural England standing advice and the development should be providing appropriate and more generous buffers as appropriate, to ensure unnecessary deterioration and harm to these irreplaceable habitats. At the same time the existing connectivity of Crooks Copse with Highwood and Slockett's Copse, is seriously at risk from the encroachment of the development proposals into the area of the northern valley, significantly narrowing that corridor beyond what is envisaged by the SP SPD. Furthermore the proposed drainage strategy gives rise to concerns in respect of potential direct surface water drainage from Development Parcel Central (DPC) and Development Parcel North 2 (DPN2) into the adjacent Dirty Ground Copse and Slockett's Copse respectively.

The proposed development fails to provide acceptable indications, and therefore sufficient confidence and certainty, that the proposed development will not cause the avoidable deterioration of and harm to the ancient woodlands on site. The application proposal fails i) to adequately set out and explain any wholly exceptional reasons which apply in this case and justify any such harm; and

ii) to clearly set out the suitable compensation strategy that would be put in place to address this harm.

In this respect the application is unacceptable, inappropriate and contrary to Policies CS3, CS14, CS17, CS18, CS19 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); Policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Strategic Objectives and Development Principle L4 of the Sandleford Park SPD (adopted March 2015).

- 6.14 It is my professional opinion that the provisional TPO is inaccurate and unenforceable and has categorised hedges, scattered trees, and agricultural land as woodlands. The woodland boundaries on the TPO do not follow the physical boundaries, but include buffer zones well beyond the woodland boundary. This is unjustifiable and unenforceable. The TPO must be reconsidered and made to accurately reflect the important trees and woodlands.
- 6.15 Any new surfacing within RPAs will be subject to detailed design to ensure a no-dig, permeable and load spreading specification is used as recommended by the provision of BS5837:2012. Ongoing design work, as is normal with an outline application, will ensure that none of the woodland buffers are detrimentally impacted by proposed construction.
- 6.16 My colleagues in planning and drainage will address those specific matters in their evidence.
- 6.17 Reason for refusal No.9 states:

In addition to the woodlands the site contains many individual trees and also others forming part of hedgerows. All the trees on the site are the subject of a Tree Preservation Order (TPO 201/21/1016-W15-MIXED).

The proposal will result in the loss of an ancient oak (T34) and the potential loss of a veteran oak (T127) to facilitate aspects of the development. In both cases the application has failed to explain why their loss cannot be avoided, as it appears that it could be, and to set out the wholly exceptional reasons and to provide details of the suitable compensation strategy that would justify their loss.

The proposal will also result in works within the root protection area of four other veteran trees and their potential deterioration, the loss of a category A tree within the central valley and the loss of a number of trees and hedgerow in relation to the extension land to PHS. All these works appear to be avoidable and the proposal does not demonstrate alternative approaches to avoid such harm to trees that are the subject of a TPO.

The proposal will also result in the extensive loss of trees and hedgerow along Monks Lane without satisfactory strategic mitigation, to the detriment of the amenity, visual quality and verdant character of this important thoroughfare street scene.

The proposed development will cause harm to a number of irreplaceable priority habitats comprising ancient and veteran trees and a number of other important trees that are the subject of a TPO, without satisfactory justification and compensation / mitigation. The proposal is therefore poor, unacceptable and inappropriate and contrary to Policies CS17 and CS18 of the West Berkshire

Core Strategy Development Plan Document (Core Strategy, adopted July 2012); and the Strategic Objectives and Development Principle L4 of the Sandleford Park SPD (adopted March 2015).

- 6.18 In response, it is my professional opinion that the TPO is flawed as described previously. Hedgerows cannot be subject to a TPO. Scattered individual trees, agricultural land and groups of trees cannot be subject to a woodland TPO.
- 6.19 Ongoing design work has focused on the retention of T34, and the Park House School extension land has been adjusted to ensure the retention of this tree.
- 6.20 In discussions with my colleagues in ecology we have agreed that even though T127 is in advanced decline, with significant defects it can be managed by pruning to reduce the risk of failure.
- 6.21 No works are proposed within the RPA of any veteran tree. T76 will be retained as part of ongoing design works for the valley crossing.
- 6.22 The trees along Monks Lane are required to be removed for the new accesses, entirely consistent with the Sandleford SPD. Extensive new planting will be carried out across the entire site. The proposed development will not cause harm to any ancient or veteran trees, or any other important trees. The TPO is flawed and inaccurate and cannot be used as a factor for a reason for refusal.
- 6.23 Reason for refusal No.10 states:

The proposal seeks to set aside part of the site to form an extension to Park House School in order to mitigate the impact of the development proposed on secondary education provision, as required by Policy CS3 of the Core Strategy. The applicants have proposed that the expansion land to be provided is used to facilitate the identified need for an additional sports pitch. The proposal however will result in the loss of the ancient tree (T34), as well as a number of trees and hedgerow along its western boundary, while also encroaching onto the buffer of the Barns Copse ancient woodland. It is apparent that these impacts could be avoided by a small increase in the area of proposed expansion land to be secured, the size of which remains inadequate, or, through an alternative proposal for the alterations to the school.

The proposal is unacceptable as it stands and as a result the proposal would fail to make adequate provision in relation to secondary education, to mitigate the needs of the development and to also ensure the satisfactory provision of a sports pitch. The proposal is therefore contrary to Policy CS3 and CS5 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); policy GS1 of the West Berkshire Housing Sites Allocations Development Plan Document (2006-2026) (HSA DPD, adopted May 2017); and the Vision, Strategic Objectives and design Principles S1 and F1 of the Sandleford Park SPD (adopted March 2015).

- 6.24 In response, it is my professional opinion that the ongoing design for the Park House School playing field extension will retain the higher quality individual trees T34 and T35, plus through the re-design work, the small trees G36 and G37 on the existing school boundary

can also be retained. There will be no encroachment of development into the woodland buffer zone set out for Barns Copse.

6.25 Reason for refusal no. 13 states

The proposal does not provide sufficient information in respect of:-

i) the interrelationship of surface water runoff between the application site and the remainder of the Sandleford Strategic Site Allocation;

ii) the impact of the proposed conveyance channels on ground water levels; and iii) the impact of surface water runoff on ancient woodland.

In the absence of that information there is potential for adverse impact on ground water and the woodlands.

Furthermore, the proposed drainage strategy proposes detention basins within the country park (A, B and C) with approximately the same surface area in square metres as volume in cubic metres, resulting in basins approximately 1 metre in depth with near vertical sides. This would be unacceptable as basin side slopes should be constructed ideally with a 1 in 4 gradient in accordance with SuDS Manual C753. The use of conditions to address this concern would not be reasonable given the limited area around the basins and high potential to detrimentally impact on existing streams (which require an 8 metre buffer zone on both sides), proposed footpaths and ancient woodland.

In addition, the Drainage Strategy Plan submitted (ES Vol. 3 Appendix K1, drawing number 10309-DR-02) is incomplete, omitting a significant element of green infrastructure comprising the River Enborne, appears to show surface water flowing almost in line with the contours in several places, rather than angled to them as would be expected. Furthermore, surface water flow appears to be directed through the ancient woodlands of Dirty Ground Copse and Slockett's Copse which is unacceptable due to potential ecological damage that would cause. With regard to the status of those woodlands as irreplaceable habitats, the development proposal has failed to determine through modelling that new surface water flow will not detrimentally affect the ancient woodland. The lack of sufficient information prevents a full consideration of the impact of the proposed development on ground water levels and ancient woodlands and the necessary mitigation required. Furthermore, the provision of acceptable and adequate detention basins are unlikely to be achievable whilst respecting the existing watercourses, proposed pedestrian infrastructure and ancient woodlands. As such the proposal is unacceptable and contrary to Policies CS3, CS14, CS16, CS17 and CS18 of the West Berkshire Core Strategy Development Plan Document (Core Strategy, adopted July 2012); the Vision, Strategic Objectives and Development Principle H1 of the Sandleford Park SPD (adopted March 2015); and the West Berkshire Sustainable Drainage Systems SPD (adopted 2018).

6.26 In response, it is my professional opinion that following discussions with my colleagues dealing with the drainage matters, I am content that the woodlands will not be detrimentally affected by surface water runoff.

7 CONCLUSIONS

- 7.1 This site is allocated for a significant development. The requirements of the Local Plan and SPD will inevitably lead to the loss of some trees across the site.
- 7.2 The development of the site and protection of the important trees has been fully considered under the national guidance as laid out in BS5837:2012. I believe that the proposal achieves a sustainable relationship between its built form elements and the existing trees and complies with the quoted policies. By implementing the precautions to protect the retained trees that are specified through the arboricultural method statement included in this report, the development proposal will have no significant impact on the contribution of these trees to amenity or character in the wider setting.
- 7.3 This proposal will result in the loss of a number of trees that are all low category because of their poor condition, small size or limited sustainability.
- 7.4 Following ongoing design review work, just 4no. moderate category trees will also be lost. The loss of these trees will not result in any significant impact on the existing amenity of the immediate locality or the wider area.
- 7.5 No veteran trees or areas of ancient woodland will be lost or detrimentally impacted by the proposals.
- 7.6 In summary, in my professional opinion, the scheme will give rise to no unacceptable impacts in respect of trees and the new, high quality tree planting which will be of considerable benefit to the local amenity.