

Introduction

Say No To Sandleford (SNTS) was set up in 2011 when the Sandleford site was surprisingly selected as the main site for housing development in the Strategic Development Plan, Core Strategy CS3. The grounds for SNTS concern were the difficulty accessing the site, the loss of amenity for local people and the destruction of key wildlife habitats. This initial concern has escalated over many planning stages as the inadequacy of the site and the plans for it have been exposed. This outline planning application for the western portion of the site continues this trend.

The problems with the site have been further exacerbated by the refusal of WBC council, or the developers concerned, to provide any meaningful investment to mitigate the negative aspects of the proposed development.

SNTS believe that the development of the site would be a mistake under any circumstances, but splitting the development into two separate applications further reduces the chances of producing a coherent strategy. We are aware of a Memorandum of Understanding between the developers of the east and west portions of the Sandleford site, but this MoU has not been made available as part of the documentation pack and so we have treated this planning application as a standalone proposal.

That said, it must be pointed out that none of the planning conditions applied to the Bloor homes application, that should cover the whole site, have been addressed in this proposal. The Sandleford site approved for development by the Secretary of State on appeal as West Berkshire Core Strategy CS3 does not include this parcel of land and on its own, this planning application, does very little to meet the housing needs of West Berkshire, but significantly impacts the amenity, sustainability, and diversity of South Newbury.

Planning Response

The timing and the duration of the consultation, over the summer months, is going to make it more difficult for all the affected parties to respond. This is particularly the case for the schools. Therefore, the weight of local opposition to previous versions of these plans should be taken into account when reviewing this application.

The way that the documents have been presented also makes a full appraisal very difficult. It would have been much easier to look through the information had the Environmental Statement been provided in fewer than the 62 individual documents presented.

Warren Road

The primary difficulty with the Sandleford site is the lack of access. This is shown again on these plans where Warren Road provides the only vehicular access to the site, during both the construction and occupation phases.

Warren Road runs alongside a secondary school, is opposite a church hall used as a day nursery and is less than 30m from the entrance to a primary school. This area of the Andover Road is the focus of a lot of activity, involving hundreds of young people twice a day.

Every morning, in school term, there is a queue of nearly stationary cars from the Andover Road / Monks Lane junction up to Gorselands. There are also cars dropping off children in

all the side roads. Currently, at this time of day, it is clear to anyone who would care to look, that the Wash Common road network is stretched to capacity. The planning proposal does not address how increased traffic from the development can be integrated into the current road system. The fact that it does not predict a problem where one already exists suggests that the model used for the traffic predictions is not accurate, particularly at peak periods.

The plans propose a 3m footpath to the north of Warren Road. Whilst the increase in pavement width around Park House School is welcomed and necessary, the plans do not say how this is going to be achieved, without affecting the current tree line, road system or school playing fields. The local plan section DM15 proscribes the destruction of trees and hedges for land development and the provision space for pedestrian and cycle access does not meet the requirements of LTN120.

The plans propose that vehicular access to Warren Road is a 6m wide carriageway narrowing to a single lane. The Traffic Assessment Report chapter 5 appendix 5.1 indicates that there will be a 'major adverse' effect on traffic. Table 5.4 suggests that there will be a 228% increase on traffic from an unexplained high start value. This brings into question the modelling that has been carried out and the veracity of the predictions it makes. Any model used should also be verified against existing road conditions at peak periods.

It will only need a minor incident to block site access for a short period, for traffic to back up along the Andover Road. Temporary blockages should be considered in the modelling of the Warren Road/Andover Road junction.

As the only access road into the development, Warren Road is not fit for purpose as demonstrated by the shoehorning of a single track "pinch point". As a comparison, the Glendale Avenue housing estate has a similar order of dwellings to the 360 proposed for Sandleford West, but has three full two way access roads.

The planning documents show that a bus or other large vehicle turning to head south out of Warren Road will obstruct vehicles heading north along the Andover Road. (Drawing 5011406 RDG XX XX XX C 2202).

The increase in vehicles around the schools will increase the particulate count. This should be taken seriously, and mitigation proposed. It is possible that the developers are considering the removal of hedgerows, which would further reduce air quality in a school. This would mean that the development does not comply with the new WBC local plan section DM8e, which states that a development '(It) does not expose occupiers who are particularly sensitive to air pollution, such as those in schools, health care establishments or housing for older people'.

The planning application states in multiple places that the developer has control of the land required to make the necessary changes to Warren Road. We don't believe that there is currently any right for vehicular access between the end of Warren Road (at Sunley Close) and the boundary of the development land. This 'gap' is currently a public footpath on unregistered land.

There is no mention of any improvements to Warren Road in the West Berkshire Infrastructure Delivery Plan.

Kendrick Road

The planning application proposes the use of Kendrick Road as an emergency access route. Other vehicles would be prevented from using this access point by the means of

traffic bollards. By default, this would open up Kendrick Road to be used by cyclists and pedestrians. Standards for Highways Document CD143 section E/3.4 specifies an 'absolute minimum' width for a shared use route of 2m with a 0.5m separation to the carriageway. Kendrick Road being less than 3m wide cannot accommodate this shared use.

The width of Kendrick Road means that an emergency vehicle would not be able to pass along it if there was any other vehicle, cyclist, or pedestrian already on it. The Fire and Rescue Service Access to Domestic New Builds – Guide for Planners and Developers (V01) recommends a minimum width of road of 3.7m.

The provision of emergency access to a new building development should be expected to be completed to the applicable standards. This proposal further demonstrates that the primary access route (Warren Road) is unfit for purpose if it cannot support emergency vehicle access in its own right.

Health Care and Education

The Environmental Statement (ES) says that local Health Care Services are at a "reasonable level to accommodate an increase in numbers of users" however most residents could give evidence that healthcare provision is already stretched and would be unable to meet the needs of the new residents.

The S106 Heads of Terms Statement makes minimal mention of healthcare support and no reference for education. The applicants give no indication of how or where additional facilities for healthcare or education are to be provided or funded.

Open Space

The site design and access statement makes reference to nearly 8 ha of open space. Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation. The largest proportion of the 'open space' in the Sandford west plan is existing woodland (Brick Kiln Copse), or SUDS. These areas are unsuitable for public recreation and therefore cannot be considered 'open space'. It is therefore unclear whether the site meets open space requirements for a development of this size.

Within the open space, the provision of play areas should also be looked at. Although no details are given, the size of the areas in which they are situated seem inadequate. The National Playing Fields Association recommends for a development of this size (with 1000 residents) at least 2.4 Ha of recreational space, within which at least 0.6Ha should be a designated, properly equipped play space.

The Environmental Statement (Non-technical summary section 4.9) also makes reference to the provision of allotments. These are not shown in any of the plans.

Wildlife

The Environmental Statement imagines that the development will bring about a single benefit to the community, through the creation of 'New Landscape and faunal provision by the creation of areas of wildflower grassland, hedgerows, swales and ponds'. The effort put into this and to increase biodiversity through the addition of bird and bat boxes has been

noted, but the plans for wildlife, and for recreation space for residents are not compatible. Recreational space for residents and their pets is unlikely to be a good habitat for existing animal wildlife.

The site needs to deliver a net gain in biodiversity and the documentation does not give any confidence that this can be achieved.

Many local residents would consider the development to reduce their amenity through the destruction of countryside, which the landscaping proposal cannot recover.

The Environment Statement Chapter 8 App 8.19 shows that the site does not provide a continuous wildlife corridor either to the East or the South of the site.

Sustainable Transport

The Transport Assessment (TA) examines the journeys that can be achieved by bicycle and correctly identifies that most amenities are within the distances covered by current cyclists. However, to enable a step change in behaviour more people need to travel by cycling and therefore these distances need to be reduced accordingly.

The issues that significantly reduce the number of people cycling to and from Wash Common is the gradient of the Andover Road, and the lack of a designated cycle route. The TA determines that the gradient of the hill between Newbury and the development site is lower than the maximum specified for casual cycle journeys by Sustrans, but does not say whether the gradient and the distance over which that gradient applies is still within the Sustrans guidelines. The plans do not address the lack of a cycle route between Wash Common and Newbury.

For a cycle way to be useful as a mode of transport, rather than for leisure use, it has to offer a direct route between destinations. Given the meandering nature of the proposed cycle ways in the development, they are unlikely to offer any enhancement to sustainable transport links in the area.

For these reasons the proposed development cannot be considered to be sustainable.

Consultation

The Statement of community involvement describes the consultation event held on the 25th May 2023, lists the concerns raised by local residents and presents mitigation in response to these concerns. However, the plans presented at the consultation and those in the planning application are indistinguishable. The concerns raised apply to the current plans. It is disingenuous to suggest (section 5.7) that a proper consultation has been carried out and people's concerns addressed.

Conclusions

The consultation period for this planning application should be extended significantly beyond the school summer holidays to allow feedback from a larger range of people.

This planning application should be refused on the following grounds:

SNTS Response to 23/01585/OUTMAJ

The plans for Warren Road do not provide adequate access for the future residents of the development site and do not mitigate the effects a single-track road would have on the local traffic, and in turn for the other residents of Newbury. They do not adequately provision for the safety of children both from the effects of air borne particulates and the proximity of an increased number of motor vehicles.

The plans have inadequate provision for recreational and play space.

The plans have inadequate provision of sustainable infrastructure, health and education.

The plans have inadequate provision for the protection of wildlife and the natural environment.

The consultation exercise carried out on these plans was inadequate and allowed no time to modify plans once residents' opinions had been sought.

Richard Page,
Secretary, Say No To Sandleford
18th August 2023