

## **SNTS Response to Amended Planning Applications:**

**15/02300/OUTMAJ (25TH OCTOBER 2016)**  
**16/00106/OUTMAJ (28TH OCTOBER 2016)**

### **BACKGROUND**

SNTS was formed by residents of Greenham and Wash Common opposed to the development of the greenfield site of Sandleford into a residential area for 2,000 homes. The principal objections are the adverse affect a development of this size would have on a historic landscape that provides a green lung to Newbury with its ancient woodlands and scattered habitat. However it is also based on the fact that this development is in the wrong place, situated on the wrong side of town, where infrastructure is inadequate for a development of this size, in an area that is already struggling to cope with 1500 new homes at the Racecourse and a further 500 in fill homes between Greenham and Wash Common. In addition the impact from large housing developments in surrounding areas in particular the proposal for 3,000 homes on the Manydown estate off the A339 outside Basingstoke has not been considered. Moreover there is real concern that the criteria used to select Sandleford as a strategic housing site was rigged to support what was essentially a political decision to avoid uncomfortable housing decisions elsewhere in West Berkshire.

These objections were overruled by the examination of the Planning Inspector in May 2012 in a report that largely supported the Council's Core Strategy. His decision to endorse the selection of Sandleford as a strategic site was predicated on a scheme that had 2 access roads to Monks Lane and a further cycle/bus route along Warren Road.

Post adoption of the Core Strategy a meeting was held, jointly hosted by the promoters of Sandleford and West Berkshire Council, where the promise was made to work with residents groups and other interested parties to shape Sandleford and ensure it integrates with the wider community. Our campaign group agreed to put aside our objections to work with the Council and developers to make the scheme work as best as could be achieved.

Since then Bloor Homes ("the Developers") were chosen as the developer of the first parcel of land and held two public exhibitions at the Rugby Club as well as attending meetings hosted by Greenham Parish Council (8 attendees) and Newbury Town Council (40 attendees). The Developers refused to attend a meeting hosted by SNTS at St Georges Hall in Wash Common held for people unable to get to either Council meetings (120+ attendees).

Those public meetings provided the basis for our initial response to the planning applications dated 29th January 2016 and 23rd February 2016, as well as extensive representations from individuals.

It is therefore noted with considerable concern that in spite of detailed work and analysis by SNTS, Wash Common Action Group and individual residents, their representations appear to have been completely ignored by both West Berkshire Planning Department and the Developers. Moreover there has been no attempt by the Developers to engage with the residents groups post the original application to see whether or not their objections can be overcome, and if not an explanation provided as to why not. West Berkshire Planning Department, paid for by West Berkshire residents and businesses, appear to have

completely ignored the consultation responses other than from statutory bodies and are intent on pursuing their own agenda when looking at access points to the development. If only the responses of statutory bodies are to be considered, why go through the charade of a public consultation?

Both developers and planners need to remember as they move to finalise the scheme that it is primarily the residents of Wash Common that will have to live with the impact of decisions they make along with the wider community of Newbury and surrounding areas and therefore it is important that the scheme works not just for the new residents of Sandford but for those wider communities as well.

## SUMMARY

Given the lack of consideration of the public consultation it will come as no surprise that the objections to the scheme raised in our responses of 29th January 2016 and 23rd February 2016 still stand. However this is with one notable exception where we welcome the revised phasing on the delivery of the Country Park where now the entirety of the western side of the park including Crook's Copse, Stockett's Copse and High Wood down to the River Enborne will be delivered alongside the development of Parcel N1 ("PN1"), along with a clear commitment as to what will be delivered with the Central and West Parcels. We have not seen the milestones to be crossed before the delivery of these phases of the Country Park but the broad phasing outlined in the Country Park Phasing Plan is eminently more sensible than previous proposals.

We also note the improvement to the main access route south from Monks Lane which puts the proposed primary school back from the main access road. However the new route proposed has introduced new problems running as it does alongside Crook's Copse and the inherent danger this places to the wildlife in this ancient woodland and the ecology of the area. It also does not address our concerns regarding the bulk of residents of PN1 having to cross this main access road to get to school. As such our original proposal on this road still stands.

However with these points noted there is little in the current scheme to commend it to local residents, indeed with what has been disclosed it is our contention that if the criteria used in the selection of Sandleford as a strategic site were re-applied then it would no longer be the site of choice and would not have passed the scrutiny of the Planning Inspector. The changed criteria can be identified as:

- 1) The need for 4 all vehicular access points instead of 2 with particular emphasis on Warren Road where the Council was at pains to re-assure the Planning Inspector that this route would be a bus only route and therefore the impact on a heavily used pedestrian area by mothers with buggies and young children would be negligible.
- 2) The requirement for 2 two form entry primary schools in the development as opposed to 1 one form primary school expanded to two form entry as originally proposed. This has significant implications on the infrastructure requirements not least the expansion requirements of Park House School and The Falkland Surgery.
- 3) The resultant impact of this changed demographic on traffic projections in the area
- 4) The fact that the distance of the site from the town centre has moved from 1.8km to over 2.5km and that it is now recognised as over 2km from the Railway Station and further from the location of the new bus station at the Wharf, putting pay to the notion that this site was within easy walking distance of key destinations. Our own measurements show that the distance from the train station entrance to the entrance of Warren Road is in fact 2.57km making a nonsense of previous claims.
- 5) The closure of Wash Common Library as a community asset.
- 6) The closure of Greenacres as a community asset and the diminution of sports land at Newbury Rugby Club, that was envisaged as a Sports Hub under the Core Strategy
- 7) The subsequent developments on Newbury Rugby Club land restricting the options for Falkland Surgery to expand to meet the needs of Sandleford, while Falkland Surgery believe they can expand the premises within their existing footprint it is less clear that there is sufficient additional parking (they already overflow to an increasingly crowded rugby car park) or indeed if there are the doctors to man the premises.

- 8) The limitations on land options for the relocation of Pitch 2 of the Rugby Club to provide a full size pitch given the land required for the development of Sandleford. It is noted that in spite of what was stated back in 2009 a needs assessment and strategy for sports pitches in West Berkshire has still not been undertaken.
- 9) The complete abandonment of rainwater harvesting and grey water recycling and the use of local electricity generation putting paid to the sustainable tag on the development
- 10) The siting of a junction on the A339 that in failing to encompass the HWRC means an extra 3 mile journey for cars full of waste material to access the recycling centre resulting in extra pollution and carbon emissions again failing the test on sustainability.

The case for Sandleford was predicated on the fact that it would be delivered as a single site, the scale of which would ensure that the necessary infrastructure could be provided for this number of homes, an aim more difficult to accomplish if housing was scattered throughout West Berkshire. This position was further clarified in the amended Core Strategy adopted in March 2015 that stated that Outline Planning must be put forward for the whole site.

However although the planning permission granted to Donnington New Homes to make alterations to Warren Road (14/02416/FUL) pre-dated the amended Core Strategy, it still pre-empted the outline planning permission that is now sought for the site as a whole. The granting of this planning application to facilitate the development of the first 50 homes in Sandleford West is therefore a clear breach of the stated intention of the Core Strategy.

We now discover that this planning permission is in any event illegal as it was granted without any prior survey of the ecological impact which is a condition laid down in the Wildlife and Country Act and the NPPF and where the survey conducted on behalf of Bloor Homes clearly demonstrates before any work is undertaken a European Protected Species Licence will be required from Natural England. This once again throws the spotlight on West Berkshire Planning Department and their failure to properly follow procedures in granting planning permissions - first highlighted in their failure to consult with Sport England in granting planning permission to The Priory to be built on the Rugby Club land.

In addition this permission pre-empted the wider consultation on Sandleford where the bulk of objections centred on Warren Road and making this an all vehicular access route. A clear aim of these objections is for the Planners and Developers to explore alternative options for accessing West Sandleford which if adopted could also encompass any bus route. This decision precludes that process and therefore is in contravention of the NPPF.

As such this permission should, for the Council's own protection, be rescinded until the proper processes and approvals have been obtained.

We are concerned about the number of inaccuracies and inconsistencies in the planning application documents which would have implications on the mitigation measures needed or otherwise. We would highlight the following:

- i) A Travel Plan that inaccurately describes the surrounding footway and cycle network. An example of this is the description of the Footway/Cycle Way on the south side of Monks Lane as 3m wide when in fact it is 2m wide including the grass verge and narrows to 1.4m in critical places. Without an accurate assessment of the surrounding network the assumptions on the uptake of walking and cycling are invalid and overly

optimistic. Conversely it feeds inaccurate assumptions into traffic modeling the number of resultant car journeys. This in turn is likely to underplay the mitigation measures required on local infrastructure to accommodate the development.

- ii) Traffic assessments that base their models on travel patterns of St Johns and Falkland Wards - both closer to the town centre and down the hill from Sandleford - are likely to be over optimistic as to what can be achieved in terms of getting people to walk or cycle.
- iii) Traffic modelling that compares a number of different scenarios but only one where there is mitigation - this flawed analysis will result in wrong decisions being made if carried forward
- iv) A Flood Assessment report that has clearly been cut and pasted from reports on other Bloor Homes Developments. This raises questions on the independence of the consultants from the Developers given that the latter are a major client of theirs. It also raises questions on the validity of the report as to how much account has been given to the unique nature of Sandleford and its topography and ecology.

Finally we would remind the Developers and West Berkshire Planning Department that they have a duty of care not only to the future residents of Sandleford but to the existing residents of the surrounding areas to ensure that the scheme is delivered safely and provides a safe environment for everyone. This is particularly pertinent to where the development interfaces with the surrounding areas to ensure that there is not a degradation in standards of safety at the intersection points where the development meets those areas and directly impacts on them as well as any mitigation taken to alleviate the strains the development will put on existing infrastructure elsewhere. The following looks at the documents submitted with the amended planning application in detail.

## DETAIL

We have scrutinised the amended documents and plans submitted by Bloor Homes and with the notable exception of the phasing of the Country Park as highlighted in Country Park Phasing Plan 04627.00005.16.306.7 (wrongly dated FEBRUARY 2015), our objections and comments provided in responses dated 29th January 2016 and 23rd February 2016 still stand.

### 1] WARREN ROAD ACCESS

We fully endorse the points made in Wash Common Action Group Response dated 24/11/2016, but would in addition highlight the following:

- a) While as objectors to the site selection of Sandleford we have always advocated that two all-vehicular access points to Monks Lane was insufficient, the outline plan put before the Planning Inspector as part of his scrutiny of the Core Strategy under CS3 was crystal clear that Warren Road was only to provide a bus, pedestrian and cycle route. This provision was robustly defended by both the Council Planning Officers and the site promoters who pointed to rigorous traffic modelling that demonstrated that for the site to work it only needed two all vehicular access points to the north onto Monks Lane. This position was defended against a vast volume of objections to the site selection of Sandleford, much of which centred on the use of Warren Road as an access point to the development, especially as objectors did not believe that it would be restricted in the way the Core Strategy defined. The Planning Inspector approved the Core Strategy not least because of the assurances given on Warren Road. If the recommendation is for the scheme to go ahead with all vehicular access to Warren Road then it should go back to the Planning Inspector for review given this was a key point in the arguments put before him.

That stated in their consideration of making Warren Road all-vehicular access the planning officers should take into account the following:

The NPPF is very clear in its policy stating:

(109) *"The planning system **should contribute to and enhance the natural and local environment** by:*

- ***protecting and enhancing valued landscapes, geological conservation Interests and soils;***
- ***recognising the wider benefits of ecosystem services;***
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, **contributing to the Government's commitment to halt the overall decline biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.***
- ***preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;***

(110) *"In preparing plans to meet development needs, the aim should be **to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.**"*

(117) ***"identify and map components of the local ecological networks, including***

***the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*** (our emphasis)

It goes on to state:

***(118) "If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;"***

The question then arises: what alternatives have either the Planners or Developers considered to altering Warren Road? What ecological assessments were undertaken prior to granting the existing permission for alterations to Warren Road and is the Planning Department comfortable that the current permission complies with the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2010 (as amended)? The existing planning permission requires the part demolition of Park Cottage and the removal of adjacent trees that have been identified as bat roosts and so will require a European Protected Species Licence (EPSL) from Natural England to enable the access road works to proceed lawfully.

In its consideration of alterations to Warren Road it is also apparent that insufficient weight has been given to the visual landscape that it provides to an area that is an important community hub for Wash Common with the proximity of St George's Church, St Georges Hall, the New Era Theatre as well as St Francis Church and Hall. Again without consideration of potential alternative routes to this part of the development this is in breach of the NPPF guidelines.

Finally the NPPF is clear in section 110 that planning should seek to "***minimise pollution and other adverse effects on the local and natural environment***". How does situating a major interchange at a site heavily used by pedestrians, particularly mothers with young children and buggies at a time when this interchange will be busiest possibly meet this criteria? The proposal also puts pedestrians far closer to the traffic on Andover Road At a time when the effects of air pollution from vehicles is becoming more widely understood in contributing to the rising incidence of asthma and other respiratory diseases this proposal is grossly irresponsible.

- b) In the consideration of Warren Road for all vehicular access insufficient weight has been given to existing pedestrian users of this stretch of Andover Road. The introduction of a pedestrian crossing opposite the entrance of Falkland School is welcome and should in any event be provided for out of the CIL payments to mitigate the impact of greater use of the Andover Road resulting from the development irrespective of the status of Warren Road. However the narrowing of pavements to facilitate this junction and accommodate three lanes can only be detrimental to the

pedestrians safety and welfare, bringing them closer to the traffic and with less room to pass safely with bicycles, scooters and buggies. The same planning principles being used for pavements and cycle routes within the Sandleford area should also be applied to the surrounding areas that will be impacted by the Sandleford development. This is a clear example where the health and safety of existing residents of Wash Common are secondary to the perceived requirements of managing traffic from this development.

- c) From the accompanying correspondence, it is clear that the main developers of the site are themselves not keen on an exit at Warren Road and have cited some of the above arguments themselves in various reports. In addition in our own conversations with Donnington New Homes they have made it clear that they themselves would prefer an alternative route to this part of the development. In which case why is the Highway Department insisting on this route? Why have they not taken up our suggestion, also favoured by Newbury Town Council and Donnington New Homes of an alternative route parallel to the Andover Road leading down to Wash Water? All of the objections listed above would be overcome by this approach which would also satisfy the requirements of the NPPF. Costs should not be prioritised over the Health and Safety of existing residents and pedestrians.
- d) In its consideration of the proposals Planners should look not only at the final outcome but also the impact the delivery of the development has on the surrounding community, existing residents as well as early occupiers of the new housing. Under current proposals to deliver 2000 homes on the site, it is envisaged it will take a minimum of 13 years to complete. Someone starting primary school in the year that construction starts, will have to juggle with construction traffic their entire school lives, and residents will have to put up with the noise and pollution of construction traffic whether from their existing homes or new homes in Sandleford. This same construction traffic will be directly passing the location of the proposed new Primary School for the western section. This blight on so many lives could be avoided if an alternative route to the site is found. It is the duty of the Planners to meet these objections and come up with some alternative routes, and if not to state why alternatives are not viable.
- e) The A34 is a strategic highway and the current bypass was deliberately routed to the west of the town so to discourage its use as a ring road. Attempts to mitigate traffic flows from Sandleford away from Newbury via a route that is operating near capacity and has recently been subject to a parliamentary debate because of a number of fatalities in the Newbury vicinity should be avoided at all costs. In particular the slip roads to and from the A34 to the A343 are unsuited to heavy traffic and heavy goods vehicles which the road amendments to the Andover Road are set to encourage.
- f) Planners should not accept a degradation of safety and environment to current residents in order to facilitate their vision of Sandleford. As residents we long accepted that siting 2000 homes in this area would need more access points than the two proposed to Monks Lane - a stance the planners vigorously refuted at the time. Now that the planners have accepted the residents position they need to work with us to ensure that the extra access points can be achieved safely for existing residents as well as the inhabitants of Sandleford. Safety should not be compromised on cost grounds and an alternative route to the development must be found. Per our response to the first consultation, we would be supportive of a route that went directly to Wash Water running parallel to the Andover Road.



## 2] A339 ACCESS

Although a number of our objections to Warren Road could also be applied to an access road to the A339, such a road is far less contentious as it does not involve access into a busy pedestrian area full of school children, nor does it intrude on a historic lane with links to Sandleford Priory with some notable trees and hedgerows. However like Warren Road it is noted that this is an access route being promoted by the Planning Department and not the Developer.

We are broadly in support of an access road to the A339 but see little in the current proposal to recommend it:

- a) given this is being promoted by the Planning Department why does not the access road incorporate access to the Household Waste and Recycling Centre. To not take the opportunity to allow an access point to this amenity whether by the A339 or off the link road is frankly scandalous given it will add considerable to the carbon footprint from the development as cars have to make a journey full of recyclable refuse up a 1.5 mile hill (an additional 3 mile round trip to what needs to be). It is also in breach of the NPPF where to repeat clause 110 ***"In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment"***. Clearly to position a new access road that does not seek to address the pollution aspect of access to the HWRC should be refused.
- b) it is hard to understand what the configuration of the current link road to the A339 will achieve given that it goes directly up to Monks Lane. Will it take much additional traffic from the development or is it more likely to become a rat run from Monks Lane to the A339 bypassing as it does both the Newtown Road and the Tesco Roundabouts? If a link to the A339 is to work it needs to be linked across the valley south of Crook's Copse to the main body of the development. Otherwise traffic seeking to get to the A34 is more likely to take a western exit. We note the ecological arguments the Developers use against this option is conveniently forgotten when they propose to run the main access road down the edge of Crook's Copse a move which is likely to be far more damaging to the ecology of this sensitive ancient woodland.
- c) the development needs a construction route that bypasses the bulk of residential homes - a southern link provides this, otherwise the new housing will be subject to years of construction traffic which also will impact on users of the new primary school.

## 3] MAIN MONKS LANE ACCESS ROAD

The configuration of this road is an improvement on the previous proposal in that it puts distance between the road and the proposed primary school. However our objections to this road remain:

- a) the new proposed route takes it down the west side of Crook's Copse which the developers have identified as the most important ancient woodland in terms of bio diversity. They oppose a route south of Crooks Copse to allow A339 access siting amongst other things the threat of road kill of badgers amongst other wildlife, yet have no compunction at putting a road down all of one side of this important ancient woodland. Before this is allowed to go ahead a full ecological study needs to be completed assessing its impact on the area similar to the studies completed for the Warren Road and A339 access routes. A less ecological challenging route would be to

take it down the west side of PN1.

- b) the Primary School is positioned the wrong side of the access road which separates it from the bulk of the residential homes. Why build a new school in a greenfield site in a position where the bulk of pupils will need to cross the main access road at a time of day when the traffic will be at its peak? Positioning the primary school beside Crook's Copse will also have ecological benefits providing a natural buffer to this important ancient woodland.

#### **4] NORTHERN PRIMARY SCHOOL**

The optimal configuration would be to locate the primary school alongside Crooks Copse which will extend the green space around this important woodland whilst routing the main access road to the west has the added advantage of bringing the maximum number of houses from the PN1 development onto the same side as the primary school, negating the need to cross what will be a busy road, with both morning rush hour and construction traffic, to get to the primary school.

#### **5] LOCAL CENTRE**

The area allocated for local business and community uses appears to have shrunk to a square - given the Council is cutting back on the surrounding infrastructure in the area (such as the closure of the Wash Common library) this would appear to be a mistake. The original configuration for the Local Centre per The Parameter Plan - Land Use Revision F should be retained.

#### **6] PARK HOUSE**

Delivery of extra land for Park house appears to be tied in with the development of the Central Parcel. As this is in the last phase of development does this mean Park House is to lose land for the development of Warren Road with no land compensation until much later?

#### **7] WESTERN PRIMARY SCHOOL**

- a) As with the Northern Primary School what is the logic of positioning this school the other side of the main access road away from the main residential areas it serves? As with the Northern Primary School it forces mothers and young children to cross this road at the busiest period of day. Note if an alternative access to Warren Road is agreed its location should be to minimise the number of crossings needed to be made to access it.
- b) The location just off Warren Road is likely to add to the congestion of what will already be a busy interchange.

#### **8] KENDRICK ROAD**

The need to use Kendrick Road for emergency vehicles (a narrow residential road inappropriate for this use) would be negated if an alternative access route to Warren Road was developed directly to Wash Water in which case Warren Road could be the alternative route for emergency vehicles.

## **9] DEVELOPMENT SPECIFICATION AND PARAMETERS DOCUMENT**

- a) 5.17 makes it clear that there is no commitment to an A339 access and the developers still believe that construction of an access point to this road is unnecessary, and not predicated in the approval of the SPD by the Planning Inspector. If this argument is upheld then the same argument should be upheld in consideration of making Warren Road all-vehicular access.
- b) 5.18 states that the development will tie in to the existing network of cycle routes to the town centre. There is no network, the Monks Lane shared "cycle route" is not fit for purpose impossible to negotiate when Park house students are going to/from school and the cycle route at the north end of Andover Road is always blocked by parked cars forcing bicycles on to the main carriageway. CIL money must be spent to provide dedicated protected cycle routes from Wash Common/Sandleford to the town centre in order to fulfill the Council's promise that this will be a sustainable development and this should be a precondition to any planning permission being granted for this site.
- c) 5.19 shows the inappropriate siting of two play areas - the one south of Crooks Copse and the one south of Dirty Ground Copse both being discreet and screened from the residential areas they serve. These play areas should be brought into the residential areas to provide natural security against vandalism and anti-social behaviour. It is also noted that the play area to the south of Crooks Copse is in an area that is ecologically very sensitive according to the developer's own arguments against having an access route to/from the A339 along this stretch. The third LEAP is now migrated to an area that is supposed to be a 3m green way through the development again this should be situated within the residential build areas.
- d) It is noted that in the original document that approximately 63% of the overall site will be in the form of greenspace accessible for new and existing residents but that in the replacement document this has been revised down to 60% - it is not made clear where the 3% has gone.

This is even more confusing as in the original document it mentions the country parkland will measure approximately 63 hectares whilst in the new document it states this will encompass 82 hectares. Is this new land or are they measuring different things?

- e) 6.6 it is noted that the mix of affordable/shared accommodation has changed markedly with the elimination of two bedroom flats for this category. Without knowing what the demographics of the demand for affordable housing it is impossible to do anything other than note this and assume that the Developers have taken Planners advice to ensure that the mix is right for the demand.

## **10] PARAMETER PLAN - GREEN INFRASTRUCTURE PLAN**

The main changes to this plan appear to be:

- a) repositioning and allocation of the main access roads - discussed above
- b) movement of the local centre away from key green corridor - this is welcomed although comments above on the reduced scope of the local centre still pertain.
- c) corrections to indicate the removal of existing hedge around the Rugby Club triangle

- d) movement of the NEAP south of Dirty Ground Copse so that it is closer to the residential area. The result is it is now doubly screened by trees from the park and hedges from the residential area. (see 9c above).
- e) we note that the main access road through the central parcel stops at the edge of the Western Parcel. Is this because the route to Warren Road is to be finalised or is it because the Developers and West Berkshire Planners have taken on board points raised at the previous consultation and are re-thinking using Warren Road as a main access point?
- f) the plan no longer shows the watercourses highlighted in Revision F, however it is noted that a new large attenuation pond is planned at the southern end of the southern valley adjacent to another attenuation pond already provisioned in this area. This is likely to considerably alter the character of the marshland that currently constitutes this valley and severely impact on the ecology of the area. More needs to be done to prevent run off at source as opposed to capturing it at the bottom of the valley. What has become of all the rainwater harvesting and other measures to prevent run off that were promised in the early scoping documents?
- g) it is also noted that although there is an existing footpath that is being retained down to the River Enborne there are still no plans to create a structured walk along the River Enborne and so control pedestrian access to the river. The result is likely to be that users of the park will create their own paths and play areas by the river which is likely to lead to greater damage to this ecologically important area. We would urge planners to take up our original suggestion of providing a safe and controlled access route to and along the river.
- h) we note that the green boundary showing the extent of the Planning Application for PN1 has been removed - is this significant?

## **11] PARAMETER PLAN - ACCESS PLAN**

- a) The main north/south route which is now shown to run alongside Crooks Copse should be re-routed to the west of the site to allow the primary school to be sited alongside Crooks Copse so that it is on the same side of the road as the bulk of residential area as well as providing a greater buffer to Crooks Copse. We have seen no evidence that this proposal has been considered and if so why it has been rejected.
- b) We note that in spite of numerous objections the cycle link to Monks Lane is still situated in a position away from existing pedestrian crossing on Monks Lane. In spite of a note in the Covering Letter to the amended application stating that it has been moved, this is not reflected in the supporting plans.
- c) We note that the A339 access road is now shown as a main access road looping around the east and north of Crooks Copse. It is hard to see what this will achieve in terms of alleviating traffic flows from the estate, however it will create a cut through from Monks Lane for people wanting to avoid Newtown and Tesco's roundabouts to get to the A339 for the recycling centre or beyond.
- d) In spite of the potential ecological impact (which is overstated given the impacts of other proposals around Crook's Copse), an access route from the A339 to the south of the Crooks Copse is the only way to meaningfully impact on traffic flows to and from the estate, and to alleviate congestion that otherwise will build up on Monks Lane and Andover Road. If it is delivered by a bridge then there is no reason why there should be the additional adverse impacts stated in the Developers correspondence with Highways.
- e) The Developer uses ecological arguments selectively when it suits their cause and reduces cost, but fail to highlight the adverse impact other elements of their scheme will inevitably have. If they were serious then they would re-look at how they are

developing around Crooks Copse and take on board our recommendations both in terms of the A339 access route and siting of the primary school.

- f) We note that the green boundary showing the extent of the Planning Application for PN1 has been removed - is this significant?
- g) We note that the plans still include public access points to and from Newbury College and the Rugby Club. While we do not know what impact this would have on Newbury College, it is unlikely that the Rugby Club would welcome a right of way for the public especially as dogs are not allowed on the ground for players' safety and this would add to the difficulty of enforcing this policy. A lack of public access through the Rugby Club has implications as to how people will access the surgery and other amenities on offer from the Rugby Ground and the impact this has on traffic flows. Traffic modelling needs to take in to account the resultant traffic flows and include plans of how to cope with the additional parking requirements at the surgery which already uses the rugby ground as an overflow car park.

## **12] PARAMETER PLAN - LAND USE**

See 3], 4] and 5] above.

## **13] PARAMETER PLAN - BUILDING HEIGHTS PLAN (incorrectly dated 12 OCT 2015)**

- a) We note the main change to this plan is the diminution of the area allocated for the Local Centre (see 5] above). This is a detrimental move from the original plan as vastly reduces the scope and feel of this community area reducing its impact as a hub for the development. We believe the scope of this should be per the plan revision G.
- b) The heights plan also appears to move away from the idea of having landmark buildings instead making all residential units facing the main access routes 3 stories high. This again would appear to be a negative step and we would like to understand the reasoning behind this. It is also noted that these higher buildings are now directly adjacent to Crooks Copse to the detriment of this important ancient woodland and where the housing lies on an east/west route is likely to be detrimental to the views and outlook of existing residents on Monks Lane which moves away from the notion of making sure the development is in keeping with the surrounding area and keeping a semi-rural feel to Monks Lane.
- c) Has any work been done on the sight lines from Watership Down? Given the importance of this area as an AONB the impact of this development needs to be minimised to ensure it does not impact on the views from this area.

## **14] APPENDIX 4**

A number of documents are shown as deleted without identifying numbers showing what they are. It is noted, although not clear, that some of the deleted drawings have no replacements and if so what if any impact this has on the final proposal. It is noted that the first of two plans on the Refuse and Cycle Strategy has been deleted but not the second. What implication does this have?

## **15] PLOT PLANS**

- a) Overall there seems to be an under provision on all of the plots for cycle stores and lock up facilities. These should be commensurate with the size of dwelling and we would suggest as a rule of thumb that at least provision for one bike should be made per

bedroom (more reasonable would be a per bed measure where a double bed would necessitate storage for two cycles).

- b) It is difficult also to judge whether there are sufficient garages in the plans. It is difficult to put the designs in context without regard to the size plots they sit on and so how much garden goes with each house.
- c) Some of the plots designated as 3 bedroom houses in actuality look more like 4 bedroom houses (eg Plots 77,179 & 215, 11 & 214, 74,82, 307, 13 & 87 amongst others and which have an upstairs lounge in addition to a ground floor garden room) and this should be taken into consideration when looking at the overall balance of housing being delivered and whether it meets the district's needs.
- d) Plots 171-76 and 229-34 these flat blocks look particularly uninspiring and austere especially compared with other flat blocks and with no rear windows we have concerns as to the aspects facing properties will have to this three story wall. Also the stairwell appears to rely on side windows for natural light. Without knowing which direction these flats face it is difficult to know whether this is sufficient but it looks bleak externally. When compared to plots 135-144 are these flats by anyway the designated affordable flats? If so how can an entire block of affordable flats be in anyway be described as pepper potting as stipulated in the SDP? And is the developer profit margins so tight on this development that they cannot afford to make these flats facades blend in with the other properties so that they are not instantly earmarked as social housing?
- e) No elevation plans for plot 274
- f) Single & Double Garages are illustrated with minis and one bicycle per garage - this does not seem adequate for most households whose cars are likely to be larger and have more than one bike.

## **16] SANDLEFORD COMPREHENSIVE MASTERPLAN (submitted with Minerals letter dated 13/10/16)**

We are being asked to consult on an out of date document as this is based on the original as opposed to amended application.

## **17] ENVIRONMENTAL STATEMENT - HISTORIC LANDSCAPE & FEATURES Figure 8.5 (incorrectly dated JANUARY 2015) (submitted with Minerals letter dated 13/10/16)**

This document is incomplete as it fails to identify Crooks Copse as Ancient Woodland (and any veteran tree designation in that area) and partly identifies Bricklin Copse, incorrectly identifies the Rugby Club and does not highlight: Park House School and The Waste & Recycling Centre as important landmarks.

## **18] TREE PROTECTION PLAN**

We are being asked to consult on an out of date document as this is based on the original as opposed to amended application. This could be material as the new main access road from Monks Lane now runs beside Crooks Copse and could impact on the protection zone.

## **19] HABITAT PLAN**

- a) It is unclear from this document what has already been granted planning permission on Warren Road and what is now being consulted on as only one plan is marked For Information Only.

- b) It is not clear what is intended for the proposed A339 junction which in our view is in the wrong location.
- c) There are no plans for the new route for the Monks Lane main access.

## 20] FLOOD RISK ASSESSMENT

- a) It is noted that the recommendation is to discharge storm water by the way of SuDS to the local watercourse network, This is based on an assumption that the soils are impermeable and therefore unsuited to local soakaways. We would urge that before this recommendation is accepted that a detailed assessment including more extensive bore hole samples is made a pre-condition of approval to confirm that soakaways are not appropriate for local water dissipation. Local anecdotal evidence would suggest soakaways are a viable option. The report by GEG on which this recommendation is based admits that their study is an outline assessment and states that further assessment may be prudent before finalising a drainage strategy.
- b) As part of the drainage strategy no mention is made of rainwater harvesting and the use of grey water recycling which could have a major impact on the drainage requirements of the area under development. These were key requirements under the scoping documents to demonstrate that Sandleford would be a sustainable development.
- c) The introduction of SuDS as currently proposed is likely to upset the ecological balance of the marshland areas especially towards the south edge of the North and Central valleys where attenuation basins are proposed. More needs to be done to capture run off at source leaving the ecologies of these valleys pristine as opposed to being viewed as a useful way to capture water and pollutants before they hit the River Enborne.
- d) One of the supposed benefits of the proposed scheme is:
  - *The swales and basins will result in a visually enhanced and attractive landscape. This provides increased amenity and social value to residents and the local community*

This may be true for other developments where clearly extracts of this report have been copied and pasted from (see below) however it does not recognise the existing marshland ecology within Sandleford. One of the principal stated aims of this development in being NPPF compliant is to minimise its environmental impact which should include the ecology that has been built up over hundreds of years from the surrounding ancient woodlands and these valleys interaction with them.

- e) For the proposed Storm Water management system to work, a number of maintenance features are required and listed in 4.38 and statute states the cost of this maintenance is to be picked up by the LA. This at a time when the Council is seeking to cut back the money it spends on drainage and repair maintenance (see Budget Proposals for 2-17/18). Given this financial background is it really sensible to introduce a system that requires regular maintenance by the LA to work?
- f) 4.73 of the report states:
  - *At present, the site and surrounding area does not benefit from any additional measures of stormwater treatment, except for the ordinary watercourses and reach of the Great Ouse.*

7.3 states:

*The benefits of this report are provided solely to Bloor Homes Ltd for the proposed development land at **Buckingham** only. (our emphasis)*

This clear cut and paste from other documents undermines the case that the recommendations made in this report are specific to Sandleford as opposed to being generic to Bloor Homes developments. How objective can these ecologists be when their livelihood comes from multiple projects given to them by the Developers? There is a clear case in a project of this scale for the Council to make its own independent assessment of the measures being proposed and their ecological impact.

g) The report also states in 4.75 & 4.76 that the attenuation basins will be used as part of the process to naturally remove pollutants from the development before it reaches the watercourses, however it says nothing about the impact these pollutants will have on the ecology of the marsh valleys where the attenuation basins will be situated. The existing marshland/bogs could be irreparably damaged through deployment of this system to manage storm run off if more is not done to capture and discharge the water at source to a greater degree than recommended by this report.

h) The problem associated with this method of managing water run off is captured by 4.77:

*The conceptual drainage proposals have been developed in a manner that will allow the site wide system to be designed to encourage passive treatment of discharged flows and to **improve the water quality by removing the low level silts, oils and metal associated with urban run-off**. Final design will provide for appropriate geometry and planting to maximise this benefit. **The detention features will provide open channel outfalls to the ordinary watercourse receptors**. (our emphasis)*

So the site will discharge clean water but with no assessment that the remnant pollutants will have on the local ecology.

i) Planners should be aware that the Sandleford environment does not need enhancing by new water features - the existing landscape and ecology is pristine other than where existing woodlands and watercourses have not been maintained by the current owners. Moreover the reason this landscape is not being developed is its association with Capability Brown and Sandleford Priory as such the landscape should be preserved as complete as possible without the introduction of new "enhancing" features.

j) Sewage Assessment - the Thames Water assessment does not include the Newbury College Primary School or the enlarged Park House School.

k) Note the map showing the Illustrative Water Drainage Strategy is dated Sept 14 and shows only one attenuation basin at the south of the site (Basin A) while The Green Infrastructure Plan Dated 11 October 2016 shows 2 attenuation basins either side of the stream running south towards the River Enborne. Has the report been updated to take into account that two basins are now required and the impact these would have on the valley's ecology?

The Adopted Core Strategy Policy CS3 under bullet point 2 states: "*Development to be limited to the north and west of the site in order to **respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandleford Priory** and the development proposed under the current application*



*accords with said policy requirements*” (our emphasis). How does siting two large attenuation ponds at the southern end of the southern valley accord with this policy objective. As such the management of storm run off from the development site needs to be re-thought.

## **21] TECHNICAL NOTE 2: DPN1 - SuDS**

2.6 The DPN1 components and features have been kept simple, natural and visible. The aim is to control the runoff starting as close as possible to its source. The use of source control features within the housing development areas manages most pollution and deals with the day-to-day runoff storage requirements.

As stated above we do not believe the scheme goes far enough in managing run off water and pollutants at source, and far from adding to the bio diversity of the area the use of large attenuation ponds in the southern valley will fundamentally alter the character and ecology of the area. More needs to be done in terms of rainwater harvesting and use of grey water within the development as was specified in the original proposals promoting Sandleford. The use of localised SuDS within the development is however welcome and we agree it would enhance the street scene.

## **22] TECHNICAL NOTE 3:: COUNTRY PARK - STORM WATER MANAGEMENT**

It is hard to conclude anything other than that the use of Swales and Attenuation Basins will do anything other than fundamentally alter the nature of the marsh valleys and the bio-diversity present in them. Especially given the Swales and Attenuation ponds will be the ultimate receptors for pollutants and contaminated water from the residential areas. The maintenance regime of this system of water management needs to be taken in consideration as to how it is funded and who carries out the work at a time when the Council has many other pressing demands on its dwindling financial resources. The proposed measures could prove potentially extremely detrimental to the fragile ecology of the site in an area that is recognised as important to surrounding SSSIs. Again more work needs to be done to be able to capture this storm water at source (it should be noted that water butts and other local water capture have little impact when major storms occur as they tend already to be full - the peak storm season).

## **23] PARCEL N1 SITE LAYOUT 1**

See 3] and 4] above.

## **24] PARCEL N1 SITE LAYOUT 2**

SEE 2] above

## **25] PARCEL N1 SITE LAYOUT 1-3**

The Parcel N1 Site Layout Plans 1-3 fail to show the position of the LEAP however this is shown in Landscaping plan 022 amongst others and is totally inappropriate given the screening of this play area from all residential properties and its location in an ecologically sensitive area as the developers own arguments against the location of the A339 southerly access route contend. This has to be moved to be within the residential built area.

## **26] STOREY HEIGHTS PLAN**

This would appear to have improved the street scene along Monks Lane although preference would be to have no 3 story buildings along Monks Lane. As noted above reference should be made to the view from Watership Down as to whether houses on this ridge would be visible from this AONB.

## **27] TENURE AND HOUSING MIX PLANS**

CS3 is clear, that there should be a mix of affordable housing pepper potted throughout the development. There is little evidence that the current proposals meet this policy objective especially where the plans showing a heavy concentration of social/affordable housing around the Newbury College boundary. In addition there is a heavy concentration of social/affordable housing in the apartment blocks, that allows the developer to meet the quota whilst limiting the siting of social/affordable housing.

## **28] REFUSE AND RECYCLING STRATEGY**

For some reason this shows the location of cycle sheds. As stated above cycle storage looks woefully inadequate with most of the Plot plans showing storage for just one cycle. A better strategy would be to have at least one cycle storage facility per bedroom.

## **29] MINERALS LETTER FROM REBECCA FENN-TRIP (13th October 2016)**

- a) *"The sensitive valley areas are to remain free from development because of their landscape and ecology value. The substantial areas of woodland, which are variously designated as Ancient Woodland and / or Local Wildlife Sites are also to be protected"*  
This statement does not accord with the positioning of two large attenuation ponds in the southern valley as noted in 20] above.
- b) An extraction of minerals in the developable area, where excavation goes beyond 2m would be conducive to arriving at better drainage at source with the possibility of installing rainwater harvesting tanks as well as soakaways local to the housing.

## **30] POTENTIAL FUTURE PITCH RE-ALIGNMENT**

- a) Have there been any discussions with the Rugby Club about the location of the pitch or the public access path across their land? This pitch alignment looks wrong as it would entail players on pitch 2 encroaching on play on pitch 3 which would be dangerous for both sets of players.
- b) It is noted that the triangle of land purchased from the Rugby Club to enable the Sandleford development has already been fenced off without a suitable replacement pitch being in situ for pitch 2. Permanent fencing of land that is designated playing fields is in contravention of Sports England policy on the provision of playing fields and should be reversed as soon as possible. The land should not be fenced off until a site for the replacement pitch has been identified and put in place, as per the condition suggested by Owen Jones in his letter to Sport England on this point.
- c) The Sandleford proposal sees a net loss of sporting provision in Newbury for which an open park is not compensation. More needs to be done to ensure there is adequate sports provision in the town with an expansion of facilities commensurate with the

expansion of the town. If direct compensation of land loss by the Developer is not possible there must be adequate provision in either S106 or CIL payments to enable this to happen. It is noted that in spite of a statement to this effect was made in 2009 West Berkshire Council has still not done a needs assessment and pitch strategy for the region and this must be completed before any agreement is made to the use of Rugby land for the Sandleford Development. It is noted that the triangle is not required until the second phase of the development so this land should be returned for use of playing rugby whilst in the meantime the Council puts a pitch strategy in place. This should be put in context of what Sport England state on their web site:

Using sport and recreation as a fundamental part of the planning and delivery of sustainable communities.

at the core of planning for sport should be a robust and up-to-date assessment of the needs for sport and active recreational facilities and opportunities for new provision. The results of the assessment should be developed into a clear strategy for meeting the identified needs, integrated into forward planning and applied within development management. By doing so, the planning system will be able to meet the requirements of the NPPF, secure the considerable benefits that positive planning for sport can provide, and help to meet our planning objectives.

Protect existing facilities: We seek to help protect sports and recreational buildings and land including playing fields. We expect these to be retained or enhanced as part of any redevelopment unless an assessment has demonstrated that there is an excess of provision and they are surplus to requirements, or clear evidence supports their relocation. We are a statutory consultee on all planning applications affecting playing field land and will object to such an application unless one of five exceptions applies.

### **31] WARREN ROAD IMPROVEMENT SCHEME LANDSCAPE AND VISUAL APPRAISAL**

See 1] above and the Introduction for specific comments. With the exception of the site selection of Sandleford itself, all vehicular access for Warren Road is by far the most controversial element of the entire development and it is unacceptable that residents views have formed no part in the deliberations of the planners and in particular the Highway Department

Given the stance taken by the Council to get the scheme approved by the Planning Inspector and the Core Strategy adopted, the fact that the Council is now the chief promoter of this access route shows an unbelievably cynical approach to the planning process in order to get their preferred choice passed and has caused a lot of resentment and anger among the Wash Common community.

The report on TPOs and the importance of the tree landscape to the surrounding area should give planners pause for thought in its own right and this study should have been undertaken before the original planning was granted to widen Warren Road. What it fails to identify is the connection of this line of trees with the original Capability Brown landscape and its connection with Sandleford Priory that should be preserved. The report admits that the landscape will be significantly altered with the loss of high quality trees and the eco-environment that will go with them. This is in contravention of the NPPF as there is no need for this if an alternative route to Warren Road is taken. This area is a significant hub for Wash Common and it should be preserved as far as possible.

### **32] TECHNICAL NOTE 5 - VISSIM MODELS**

- a) Any traffic model scenario in regards to Sandleford that does not consider its impact on the A34 is incomplete.
- b) We note that all the scenarios considered included full access from Warren Road but none of the scenarios considered A339 as part of a three access strategy. This seems bizarre as there is widespread support for an A339 route to the development but almost universal opposition to Warren Road apart from the West Berkshire Highways Department and with reservations New Donnington Homes (Bloor Homes in their correspondence with West Berkshire Planners have expressed their own reservations about proceeding with a scheme that includes Warren Road).
- c) It is unclear what conclusions to draw from this note other than any model that has mitigation measures will perform better than a model that does not. Our understanding is that the aim of having more access points is not to the exclusion of the other mitigation measures and therefore a more valid exercise is to look at the following scenarios:

- x2 access with Warren Road as bus route
- x3 access with Warren Road full access
- x3 access with A339 full access (including southern link road to development)
- x3 access with A343 link road to Wash Water
- x4 access with A339 and Warren Road full access
- x4 access with A339 and A343 link road to Wash Water

All scenarios to be modelled with suitable mitigation measures to show the overall impact of the development on Newbury and surrounding road network.

Also any analysis should show the total number of traffic movements anticipated at key points of the day and how this increases/decreases from current traffic movements. This is particularly critical to the Warren Road access where the build up of pedestrians during school drop off needs to be factored in to the overall traffic volumes at that time of day, alongwith the impact of the new primary school off Warren Road.

Given traffic pollution is the biggest contributor to poor air quality in Newbury we need to understand whether the proposals make that better or worse.

As it stands this study does not provide valid comparisons or analysis on which any sound planning decisions can be made. A report on traffic delay times based on a biased study does not provide the overall analysis that is needed to make sound decisions.

### **33] FINISHED CONTOURS 10 OF 12**

Appears to be missing from the documents up for consultation

### 34] TRAVEL PLAN

- a) 1.7 Scope of Travel Plan - for any study this should also look at the resultant expansion of surrounding facilities in particular The Falkland Surgery and the expansion of Park House secondary school.
- b) 1.8 The Travel Plan should also include the impact of construction traffic given this is a minimum 13 year construction project that covers the entire school lives of students starting out at Primary School when the work commences.
- c) It is inconceivable that some aspects of the travel plan should be prepared as part of the reserve matters application. These matters need to be out in the open upfront as it is critical as to whether or not the mitigation measures are sufficient for the wider community. This includes businesses and schools where it is known that the latter will be drawing pupils from outside the development area.

It is noted that The Tavel Plan identifies the site as approximately 2.5km from the town centre to the centre of the site as the crow flies, and over 2km from the railway station - this compares to the 1.8km from the town centre used in the criteria for choosing Sandleford over other housing sites as presented to the Planning Inspector. Our own measurements show that the distance from the south side entrance to the Newbury Train Station to the entrance of Warren Road is in fact 2.57km This is important as section 3.23 notes ***"It is widely accepted that walking and cycling are the most important mode of travel at the local level and offer the greatest potential to replace short car trips, particularly under 2 kilometers for walking and under 5 kilometres for cycling." (our emphasis)*** It does not point out the importance of gradients and whether this is a deterrence to cycling.

- d) 2.7 *The application site contains pedestrian and cycle routes which link into Newbury's existing walking and cycling networks, with access to Monks Lane, Warren Road, Andover Road and Newtown Road.* Note none of these roads have protected cycle lanes with the exception of Monks Lane which is narrower than those being proposed for the development.
- e) 2.8 *The development also incorporates improved linkages to existing services and facilities in the locality, including provision for direct links to Newbury Rugby Club, Newbury College and Park House School*

It is noted that the Rugby Club objects to these direct links which would make policing the site harder and rules such as prohibiting dog walkers on the site harder to enforce. It would also make the Rugby Club car park a natural parking place for people seeking to access the country park with no other car parking provision having been made.

- f) *Considering improvements to the wider links to Newbury town centre and the railway station, specific enhancements such as the provision of facilities and infrastructure for pedestrians and cyclists on specific routes have been considered. Details of these improvements will be included in the off-site mitigation package yet to be finalised.*

Given that these mitigation measures are critical to the traffic assumption models it

cannot be logical to approve this application and its traffic assumptions without understanding fully what these off-site mitigation measures are and whether they are likely to have the desired outcomes in reducing the number of private car journeys.

- g) 3.1 *“In the immediate vicinity of the site on Monks Lane, which is street lit throughout, there is 3.0m wide shared foot/cycle way on the southern side of Monks Lane (i.e. to the north of the application site), while on the northern side of the carriageway there is a continuous 1.8m - 2.0m wide footway.”*

This assessment is just plain wrong:

the street lighting on Monks Lane currently reflects the semi rural nature of this street and does not provide full town lighting:

the shared foot/cycle on Monks Lane on the south side is not 3m wide as claimed, but at its maximum is 2m, narrows to 1.8m outside Park House School, is 1.5m wide in places with street furniture (street lights and signposts) and alongside the surgery narrows to 1.4m. Note these measurements were taken in winter months when the hedges are cut back, when they have summer growth these measurements can be reduced by up to 0.5 metres.

This is why Monks Lane already suffers pedestrian congestion at school drop off and pick up times where the volumes of students and bus drop offs make passing in the opposite direction hazardous and why as such although designated a cycle route it is not fit for purpose (the presence of hawthorn hedges also make the needles a puncture hazard for any unwary cyclist). These widths are considerable less than those accorded to the residents of Sandleford, and yet Monks Lane is and will be a far busier pedestrian route.

The lack of care shown in measuring this pathway does make one question the validity of other sections of this report, and it therefore underestimates the mitigation measures that will be necessary

Note also that although Monks Lane is supposedly a 30mph route it is rarely enforced and the bulk of cars travel as if the speed limit was 40 mph.

- h) 3.4 Reference made to *“wider footway network”* where is this exactly? Rupert Road links on to Chandos Road that does not have especially wide pavements. Again authors of this report do not appear to have checked their facts.
- i) 3.5 The pedestrian way along Andover Road is considerable less than 2m on the eastern side given that most of the footway is in fact a banked grass verge that forms a ditch alongside long stretches of the footway (closest to the applicant's site). Reference in this paragraph to a Pelican Crossing across Monks Lane again shows a lack of care on the part of the authors which again undermines the validity of the whole report.
- j) 3.6 The pedestrian crossing on Essex Street is a welcome addition to the safety of pedestrians in the area especially for the large number of elderly residents with various levels of mobility issues. However the nearby presence of the car entrance to the local parade of Monument Shops with the requirement of deliveries from high sided HGVs alongside the proximity of the double mini roundabout means that this area is often bottlenecked especially from 8:15am to 9:00am and 15:00 to 15:45 with large vehicles

stuck on one side of the road causing an impairment of vision at the crossing. Increasing the number of pedestrians/cyclists without further mitigation measures will have a significant detrimental affect on movement of pedestrians and vehicles in this locality. We would again urge planners to consider our original response on measures that could be taken to alleviate this bottleneck.

- k) 3.7 There are no dedicated crossings on either Andover Road or Monks Lane that seem to be implied by this report. Pedestrians cross the roads at this point of Monks Lane/Andover Road as they would any other place along the road, often having to wait in the middle of the road for safe passage to the other side.
- l) Similarly 3.9 there are no dedicated crossings in these localities, and crossing Monks Lane at this point next to a busy roundabout is perilous.
- m) 3.12 The description of this route from the application site makes no mention that the footpath across the site currently stops at the A339 and for pedestrians to cross over to the Eastern footway involves running the gauntlet of three lanes of traffic travelling frequently at speeds in excess of 50mph
- n) 3.14 & 15 As discussed above although Monks Lane is designated a shared footpath/ cycleway its narrowness in parts and use by school children makes it less than fit for purpose and if pedestrian/cycle traffic is increased on this route without mitigation will inevitably lead to a serious incident.
- o) 3.14 & 17 To describe Elizabeth Avenue/Valley Road as a quiet route shows that the authors have not visited this road during school drop off and pick up times where school traffic combines with some commuters using this as a rat run to by-pass the major Newbury routes. With a primary and infant school directly off it combined with St Bartholomew's Fifth Avenue/Bartlemy Road drop off points these are well known local hot spots which have been at the centre of recent controversy with the planned removal of the local lollipop man during school hours. To add cyclists to this mix again will cause significant issues. We don't know when the Newbury and Thatcham Cycle Plan was authored but it looks to be severely out of date and not commensurate with current travel patterns.
- p) 3.18 Again in the report's description of Rupert Road the authors clearly have not been on this route during rush hour when it is a rat run and makes the description of it as a quiet route laughable.

The errors in this report are significant as there is a presumption that all these routes can safely be linked into Sandleford to take cycle traffic at peak times and so mitigate car journeys. As such it would appear that they are overestimating the impact their travel plan will have and therefore underestimating the number of car journeys. Mitigation can work but only with a significant beefing up of the cycle routes leading into town including physically protected cycle paths.

- q) 3.22 *"As set out previously, whilst improved cycle links to existing services and facilities will be provided within the development scope, specific improvements will be explored in line with WBC's aspirations for route improvements."*

This will only be achieved if there is an accurate base point from which to start which this report clearly does not provide.

- r) In the case for selecting Sandleford it was ruled under the original criteria that taking the centre of the site as the point for measuring its distance from the town centre was incorrect at that by moving the centre point it could be shown that the bulk of the site was within 1.8km of the town centre or within 20 minutes walking distance. This was met with incredulity by residents of Wash Common who are closer to the town centre and where it is prudent to leave 30 minutes to walk to the train station.

Under section 3.25 it is now shown that in fact the train station is in excess of 2km distance and the town centre in excess of 2.5km. As such walking as an option to reduce local car journeys is not going to be a viable option for most people especially for families with young children and elderly residents both of whom are expected to make up significant portions of the occupants. The walk to the train station is acknowledged as a minimum of 36 minutes and to the new bus station over 38 minutes.

Moreover given Monks Lane is under 1.5m wide in places it cannot be considered a cycle way even if it is designated and as such the site cannot be considered to be within 100m of a designated cycle route that is fit for purpose.

Given these facts on the ground, these need to be understood and fed into the travel plan so that a realistic assessment can be made on the likely impact of any incentive schemes in reducing car journeys, and a sensible assessment made of mitigation needed to improve the surrounding footpath/cycle network.

- s) 3.26 & 3.38 and Figure 3.4 shows the majority of Newbury including the railway station and town centre lies within 5km of the site and so is suitable for cycle journeys. What it does not show are the contours/gradient for the return journey along with the lack of suitable cycle paths that makes the centre of town inaccessible for all but the fittest cyclists.
- t) 3.33 to 3.36 & 6.14 indicates existing bus services but these services are not heavily used because of the lack of frequency (you need to budget a trip of two hours in town to use the buses which makes it impractical for the majority of people). Without an increase in frequency of services it is hard to see how greater use of the bus service is to be encouraged. Also what level of subsidy will be provided for these bus services and for how long? Current fare structures make it cheaper to drive and park in town.
- u) The provision of a car club is welcome, although this should be supplemented by electrical bicycles for hire as well which would overcome the gradient issues noted above. However the caveat is that under 6.22 the “*commitment*” to providing 4 club cars is not a commitment as such but predicated on the successful uptake of each club car as it is rolled out. Under such a phased approach it is hard to see what incentive the developer has to make the scheme a success as the more successful it is the more expensive it is for them. Also given the nature of journeys to be encouraged with the car club why wouldn't the scheme roll out with all electric vehicles from the start? It is noted that an all electric vehicle is only proposed as the fourth car ie when usage levels of the other three cars warrants the purchase of a fourth. Also it is questionable whether a single car as envisaged at the outset is viable due to the increase likelihood of the scheme's members clashing demands.



- v) 4.3 As stated in our previous response the use of St John's Ward and much of the Falkland Ward (here and Appendix E) to model expected travel patterns for the development is flawed as both wards are:
- for the most part closer to the town centre
  - further down the hill and so walking or cycling presents less of an issue. However the percentages of cyclists from these wards may provide an indication of the upper limit of what could be achieved in terms of encouraging alternatives to local car journeys
- w) Without specific information on mitigation measures being taken in terms of frequency of new bus services and the location of dedicated, protected cycle routes it is very hard to see the target of single passenger car journeys making up 61.4% of the target anything but aspirational, and those numbers should not be used in traffic modelling.
- x) 5.0 WBC instigated a push on Travel Plans in the Falkland Ward a couple of years ago. Do we have any data on how effective this was in changing peoples travel habits? If so this should be fed into the Travel Plan being suggested here, along with a check of how realistic the assumptions are.
- y) 6.3 Any sustainable transport strategy has to include measures that improve the existing cycling infrastructure. Simply linking in to shared pedestrian/cycle pathways will not achieve the desired outcomes - the increasing pedestrian/cycle traffic on the existing Monks Lane path will simply make what is already a dangerous path at certain times of the day worse.
- z) 6.4 providing high quality pedestrian and cycle paths within the site will not promote anything other than recreational cycling within the site unless they feed in to equally high quality pedestrian and cycle paths outside the site to destination points that residents need to get to for shopping and work.
- aa) 6.5 upgrading the existing footpath across the site will undoubtedly alter the rural feel of the current track, but again will have limited benefit unless it enables the footpath to connect to the wider network and access to Greenham Common. This can only be achieved if a safe crossing is enabled across the A339 at the point that the footpath intersects it.
- bb) 6.9 "*An appropriate level of car parking will be provided for the development.*" Is this solely for residents? Unless sufficient parking is made available for visitors then there is a danger that parking will spill over to existing resident spaces and car parking spaces of community assets such as St Francis and St George's Churches and Halls as well as the Rugby Club and Monument parade of shops all of which are already operating at near capacity.
- cc) 6.11 What space is being made available to these bus stops? Otherwise they will encroach on the cycle way that the developers want to encourage use of, and buses stopping will add to the congestion along Monks Lane at the worst times of day.
- dd) 6.16 Until the two halves of the development are linked bus journeys will be required to enter the site from two separate access points and loop back - ie Monks Lane and the proposed Warren Road or alternative.

- ee) 6.29 - 6.31 As noted earlier encouragement to use cycles for local journeys will only work if there is sufficient storage for cycles available to families within their plots. The houses seem under provided for cycles storage to allow families the option of cycling to work/school.
- ff) 6.32 the issue is not pedestrian facilities at the Essex Street/Monks Lane/Andover Road roundabout but the pedestrian/cycle ways leading up to this and other junctions. It is noted that although a pedestrian crossing is proposed for the Warren Road/A343 junction pedestrians leading up to this junction will be more exposed due to the narrowing of pavements and verges required to accommodate this junction.
- gg) 6.33 without details of what the improved cycle linkages consist of it is impossible to judge whether the targets set out in this document are achievable. There are no safe cycle links to the town centre from Wash Common currently, what is provided is often more dangerous than not, such as the "cycle lane" approaching St John's roundabout along the bottom part of Andover Road which always has cars parked on the southbound side forcing cyclists onto the main road. Without dedicated, protected cycle ways to the station and town centre it is hard to see how the usage levels of cycles anticipated in this plan will be achieved in practice.
- hh) 6.34 A hire facility for cycles may be more appropriate with electric cycles being provided to aid and encourage people to tackle the gradient on the return journeys as noted in u) above.

In our view the sustainable transport measures proposed fail to provide safe and suitable access to the site for all people. Appropriate access to all areas of the site using sustainable modes of travel has not been demonstrated (specifically the development to the east of the A343). This, combined with the ease of movement between the site and the Strategy Road Network by car, indicates that the proposal is not balanced in favour of sustainable modes of travel; would not give people a real choice about how they travel; and would not improve and promote opportunities for healthy and safe travel. The proposal is therefore contrary to the National Planning Policy Framework, Policies CS13 and CS14 of the West Berkshire Core Strategy (2006-2026), Policies LTP AT1, LTP AT2, and LTP K13 of the Local Transport Plan for West Berkshire (2011-2026), and West Berkshire Supplementary Planning Document "Quality Design".(with acknowledgement to Planning refusal 14/02480/OUTMAJ)

### **35] ACCESS REV B**

There is concern as stated above that with the current configuration of the access to the A339 that this road will become a rat run for motorist seeking to avoid the Tesco and Newtown roundabouts.

### **36] ICD JUNCTION 8 - 15**

It would appear that the developers have not taken on board any of the responses to the prior consultation. Our objection to changes of this double mini roundabout into a larger single roundabout remain:

- a) long vehicles turning left from Andover Road to Essex Street are still obliged to use the outer lane and cut across the inside lane - a hazard to both motorists and cyclists. It beggars belief that such a road hazard with obvious potential for accidents would be

purposefully designed in to the layout.

- b) there is no protection for pedestrians seeking to cross Andover Road at this point - a popular pedestrian route due to proximity of the Falkland Surgery and Pharmacy, Rugby Club and David Lloyd Centre all off Monks Lane. The increase in traffic volumes as a result of the development will make this crossing far more hazardous than is currently the case especially with no central pedestrian refuge on the Andover Road to provide a waiting zone midway.
- c) Removing the double mini roundabout will encourage heavy traffic along the Andover Road, which has already seen an increase in recent years as it is a popular route for trainee HGV drivers, with ensuing risks to an area heavily used by pedestrians. Removal of the double roundabout is also likely to have an adverse affect on traffic waiting on the right of way as there will be less breaks in traffic movements on the major roads.

### 37] STRATEGIC LANDSCAPE AND GREEN INFRASTRUCTURE PLAN

- a) The north valley shows two SuDS basins whilst other plans only show one, the southern valley shows two large SuDs basins, where other plans show only one. There seems to be conflict as to whether these are SuDS or attenuation ponds and this needs to be clarified.
- b) The dominance of these features in the Northern Valley will completely alter the ecology of this area which in other documents the developer is keen to defend in order not to build a southern link road to the A339.
- c) See earlier comments on the positioning of LEAPs and the NEAP
- d) We note the footpath running down the bottom of the central valley, again this would seem to be putting at risk a sensitive ecological area of the park as well as providing a route under the bridge crossing the valley which could become a destination for anti-social behaviour.
- e) No access is given to the River Enborne - this is likely to lead to unregulated paths being created to get to the river.

### 38] ADDENDUM TO 2015 ENVIRONMENTAL STATEMENT (ECOLOGY)

- a) It is noted that 2016 survey work conducted for the first time along Warren Road identified bats roosting in trees either side of Park Cottage which are to be removed under the existing planning permission for Warren Road improvements. It is also noted that the report states under 2.4.3 *“As two bat roosts have been confirmed in trees either side of these buildings, should the road design option chosen require the demolition of Park Cottage, as well as the removal of these trees, **then further surveys will be required to establish the presence or likely absence of roosting bats to further inform the European Protected Species Licence that will be required to enable these works to proceed.**”* (our emphasis)

This begs the question as to why this survey work was not undertaken prior to the original planning permission on Warren Road was granted. That planning permission should be reviewed in light of this new information. It is noted that the bat population is such as to be considered important at County level, and therefore measures need to be taken to ensure it is suitably protected.

The report goes on to say:

*“Circular 06/2005 makes clear that: “It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established **before the planning permission is granted**, otherwise all relevant material considerations may not have been addressed in making the decision” The surveys have established the need to obtain a licence prior to works commencing on the Warren Road scheme and the A339 Link Road and therefore such a condition can be applied to a planning permission relating to these developments.” (our emphasis)*

Clearly West Berkshire Council did not follow the correct legal procedures when given permission for the initial works on Warren Road.

The same point can be made in respect to the Hazel Dormouse which are of importance at District level. Also the study of invertebrates showed Nationally scarce species considered to be of county value. The scarcity value of these species has yet to be downgraded and so are still to be treated as important.

It is also noted that similar work should have been undertaken before granting permission to Newbury College. This would suggest that West Berkshire Council’s planning procedures need urgent review to ensure that they are complying with the law when granting planning permissions.

- b) 4.4.2 *“construction works within 150m of a barn owl nest, i.e. Warren Road, could disturb nesting barn owls **this could be an offence under the W&CA** it is considered that in the absence of mitigation, it is probable that there would be a significant adverse effect at a local level on bats, and a breach of the Conservation of Habitats and Species Regulations 2010 (as amended). However, as rarer species of bats are known to be present within Sandleford Park, it is still considered that in the absence of mitigation, there could be a significant adverse effect at a county level on commuting and foraging bats and the confidence is certain / near certain. As noted in the ES (Section 7.3) a European Protected Species Licence (EPSL) will be required from Natural England to enable the access road works to proceed lawfully.*

*In addition to those sites assessed within Table 2, Figure 9, the A339 proposals by West Berkshire Council show a ‘Consented Newbury College Extension’. This appears to include additional parking spaces and a new building, which extend across the existing species rich hedgerow to the north of the survey area and could also directly or indirectly impact the tree known to support roosting bats, and other trees with low potential to support roosting bats.*

*This could potentially lead to impacts on species-rich hedgerow, bats (roosting, and commuting and foraging), dormice, breeding birds and reptiles. In this eventuality, and in accordance with the findings of the ecological surveys undertaken to inform this further assessment, it would be anticipated that any extension to Newbury College would be required to mitigate for any likely significant effects on ecology. Therefore, these cumulative impacts are not considered to be significant as they are already impacts that could potentially occur within the A339 design scenarios, so no additional mitigation (other than that outlined within this addendum) would be considered necessary cumulatively.” (our emphasis)*

Again this poses the question of why this survey work was not undertaken prior to the

granting of planning permission to Newbury college and suggests that West Berkshire Council needs to review its planning processes to ensure it is compliant with the W&CA and the Conservation of Habitats and Species Regulations 2010 (as amended)

- c) NOTE However there is nothing in this report to indicate that an A339 link road to the south of Crooks Copse will be any more detrimental than any other of the proposals for the development for which suitable mitigation could be taken.

### 39] SANDLEFORD COUNTRY PARK PHASING PLAN

This plan does not make clear as to what will be delivered when, however assuming that the area highlighted purple is intended to be delivered in conjunction with the development of PN1 then this change is very welcome and is to be commended as it will relieve pressure on Crook's Copse that was identified in the original phasing plan. However our approval is conditional on understanding the milestones on which each of these phases will be delivered.

### 40] COVERING LETTER FOR AMENDMENTS (14th OCTOBER 2016)

- a) It is noted that the letter states that a pedestrian access has been moved to be in close proximity of the crossing on Monks Lane by Rupert Road, where is this reflected in the plans?
- b) The letter makes mention that a visual assessment of sight lines has been made from the first floor window of St Gabriel's School, however of far greater significance to the wider general public are the sight lines from Watership Down and the surrounding AONB. Of particular concern are the heights of the buildings along Monks Lane ridge that may impair this view. Has any assessment been made on this? If note this should be done before any planning approval is granted.
- c) The Developers support the residents case that the Warren Road access is undesirable in a very strongly worded statement:

*“Section 3 provides the assessment of the impact of these highway works during the construction phase and then with mitigation in the longer term. This provides supplemental environmental information to be considered alongside the Environmental Statement. It identifies, the significant adverse effects associated with the widening of Warren Road and, as we have discussed previously, the Council will need to undertake a planning balance exercise, weighing the traffic and transportation effects of the Warren Road access and the environmental impacts. Given conclusions drawn through the highway modelling exercise this is something that needs to be discussed as a matter of urgency as **there appears to be no justification for this or therefore the extensive loss of trees and associated impacts.**” (our emphasis).*

In light of this it would appear that only Donnington New Homes and the Planning Department are in favour of a Warren Road Access, and even DNH have stated to us in conversation that they would prefer an access road to Wash Water. Why then is Warren Road still being pushed by the Local Authority's Highway Department?

The current proposal for Warren Road is deeply flawed and open to legal challenge if

planning permission is granted. Indeed the initial planning permission could be subject to judicial review given requisite survey work was not undertaken before planning permission was granted.

- d) The plans do not provide for development of de-centralised energy generation and individual renewable energy sources on dwellings contrary to the Core Strategy and contrary to what was scored in the selection criteria.
- e) The plans do not provide for rainwater harvesting and grey water reuse contrary to 9c of the scoping document for Sandleford.

## CONCLUSION

Given the numerous issues highlighted with the current application, unless there are significant amendments made along the lines we have suggested then this planning application should be refused.

## Appendix A - Signatories to the snfs objection letter

**Jacqueline Acatos**

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**Carolyn Aston**

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**Jed Bayley**

Wildwood Kendrick Road Newbury Berkshire RG14 6PW GB

**Elizabeth Bergqvist**

Wedgecroft Round End Newbury Berkshire RG14 6PL GB

**Angela Blades-Moore**

8 Battery End Newbury Berkshire RG14 6NX GB

**Margaret Blaine**

49 Meyrick Drive Newbury RG14 6SY GB

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28 Battle Road Newbury Berkshire RG14 6QU GB

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**Pippa Brown**

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**Jamie Brown**

5 Gorselands Newbury Berkshire Rg14 6PU GB

**Alex Brown**

5 Gorselands Newbury Berkshire Rg14 6PU GB

**Craig Brown**

5 Gorselands Newbury Berkshire Rg14 6PU GB

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**Mrs Carolyn Bullen**

52 Essex St Newbury RG14 6QS GB

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**Julian Swift-Hook**

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**Ann Toms**

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**Russell Toms**

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