

Sandleford is a touchstone for three key areas of Government Policy:

- 1) Environmental Protection
- 2) Action on Climate Change
- 3) Improvement of Air Quality

1 The Environment

The world has changed considerably since Sandleford first emerged as WBC's preferred choice for a strategic housing site for 2,000 homes. At the time we were told that Thatcham was not being considered for such a large scale development as it had already seen considerable development and needed time for infrastructure to catch up. The other site short listed was North Newbury but narrowly lost out in part because it could not develop as many houses as being offered at Sandleford, in spite of being nearer the town centre and more accessible to the transport links and local employment centres.

Environmental considerations as to the potential harm such a large scale development could have on the patchwork of ancient woodlands on the site and other protected habitats did not feature heavily and it was argued that what harm may be caused could be mitigated. Indeed the argument used by the then Executive Councillor with responsibility for piloting the Core Strategy through Council (and an argument he continues to use) is if not Sandleford then where?

Since that time we have learnt that in fact Sandleford can deliver nothing like 2,000 homes. On the footprint originally presented as part of the Core Strategy the developers now acknowledge that they can build only 1,350 units, 160 of which would be in the form of care accommodation and this can only be achieved by building right up to within 15m of the ancient woodlands and protected habitats.

Worldwide research that we have presented shows that 15m buffers are nowhere near sufficient to prevent harmful impacts from large scale developments and the resultant air pollution to the biodiversity of ancient woodlands. The Woodland Trust argues that buffers of at least 50m are needed to prevent the worse effects from development on biodiversity, and

even then in the case of road pollution that is insufficient. If that was accepted as a minimum then the number of houses that Sandleford could deliver drops significantly and if you are looking to develop 900 units or fewer the question becomes not so much “if not Sandleford then where?” but “why Sandleford at all” when so many more suitable, sustainable sites exist in the area for that number of homes?

The experts will argue that adequate protections can be put in place that will mitigate the worst of the impacts from a development of this scale, but the research is not on their side nor is the NPPF and the planning guidance that sits alongside it. 175a of the NPPF could not be clearer:

“if significant harm to biodiversity 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”

And it is important to note the wording of the Planning Guidance when looking at what such mitigation looks like. When considering buffer zones what it does not say is : “For Ancient Woodlands you should have a buffer zone of 15m” What it does say is:

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

The siting of 100s of new houses next to ancient woodland is highly likely to have impacts other than just potential root damage, i.e. noise and light pollution, dust and other airborne pollution, production of nitrogen oxides from gas boilers (have the appellants measured this and provided a nitrogen modelling report?), fragmentation, hydrological changes, and most importantly increased recreational disturbance and damage from humans.

In this regard it is impossible for anyone to argue that 15m buffers are more than sufficient, especially when the appellants plan to surround one of the woodlands, Crooks Copse in concrete, a woodland that their own ecologists have recognised as being the most important in terms of biodiversity in the

area in spite of best attempts by the land's owners to deplete that biodiversity in recent years by running pheasant shoots from it.

However the NPPF also argues that we should look beyond the confines of that framework when considering planning applications and we need to be cognisant of Para 6 of the NPPF that states: "Other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission."

As such this planning appeal cannot be considered in isolation of wider government initiatives. The government has committed in its 2019 General Election manifesto to planting 30m trees a year, of which ancient woodlands are at its heart. As recently as September 2020 the Prime Minister in a statement to the UN conference on biodiversity committed the UK to protecting 30% of its land for nature by 2030, and in signing the UN's Pledge for Nature stated:

"We must act now – right now. We cannot afford to dither and delay because biodiversity loss is happening today and it is happening at a frightening rate. Left unchecked, the consequences will be catastrophic for us all. Extinction is forever – so our action must be immediate."

It is impossible for the Government to make such pledges if action is not taken today to preserve and enhance the few ancient woodlands we still have which currently make up less than 2.6% of our landmass. It is also impossible to see how *any* development of Sandleford moves us closer to achieving that goal. This is especially the case where alternative sites do exist across the district to take some 900 homes:

400 units have been identified in the Kennet Centre
only 400 homes of a possible 1,000 are being built in north Newbury
Newbury Showground offers a possible 72 hectares of brownfield site for development

All this ignores the 2,500 homes now being put forward within the local development plan for Thatcham

2) Climate Change

Action on climate change is now a material consideration in planning applications. In refusing a recent appeal to develop part of the Wasing Estate Planning Inspector Stephen Wilkinson stated “I acknowledge that the appeal scheme would result in benefits for the rural economy, the development of previously developed land and the re-use of two non-designated heritage assets. However these matters *are not sufficient to outweigh the harm which would result from the carbon emissions derived from the increase in vehicle trips resulting from this proposal.*”

Housing Developers can no longer escape from their obligation to shoulder their share of responsibility in helping our country meet its obligations under the 2015 Paris Climate Accord. Indeed the Prime Minister has recently gone further to commit the UK to a 78% cut in our carbon emissions by 2035.

With this backdrop it is hard to imagine a more irresponsible development proposal than the one being put forward by Bloor Homes. Part of the problem is not of their making, the location of Sandleford where the nearest proposed entrance is 1.92km by road from the train station and 2.5km from the town centre, and at the top of a ridge up to which is a long incline, means that any development put forward is going to have to be car dependent. History shows that mitigation measures such as diverting existing infrequent bus routes through the development will not work unless such buses take a direct route to the end destination and that people want to travel to rather than meandering through myriad of stops before getting people to the train or bus station, to places of work or to the town centre and are of a frequency that fits with peoples working and leisure time. By its very location this site is unsustainable in terms of reducing vehicle emissions as it will result in many more vehicle trips than would be the case from a more sustainable location closer to the town centre and places of work.

However Bloor Homes compound the site problem by helicoptering in one of their template designs that you can be seen being built up and down the country. This will not distinguish Sandleford as being a part of Newbury or its surrounding neighbourhood of Wash Common, but will be instantly recognisable as a Bloor Homes development. And yet the Secretary of State for Housing, the Right Honourable Robert Jenricks MP was clear, when

launching his reforms of the Planning Process in August 2020 that the plans would lead to:

“The creation of a fast-track system for beautiful buildings and establishing local design guidance for developers to build and preserve beautiful communities”

This is the antithesis of national design templates that carry no recognition of the locality in which they are set.

Building homes today that you know will have to be retrofitted in the future to make them zero carbon, is simply unacceptable and against one of the government’s core policies. As a society we cannot afford to continue building homes that are reliant on the car and reliant on fossil fuels. So even were this appeal to be accepted on environmental grounds and location grounds one would expect to see designs put forward that maximise south facing rooflines for solar gain, be they PV or thermal, that have inbuilt renewable energy sources for water and heating and that are insulated to the highest standards, yet Bloor homes are offering nothing of the sort in putting forward these proposals.

Instead in their defence of sub optimal housing the appellants are using the recent ruling by the Secretary of State on the Wises Lane appeal where the Secretary of State whilst acknowledging the scale and urgency of the climate change emergency notes that the Council’s stipulations to take housebuilding beyond building regulation standards “is guidance only which has not gone through a public examination process, rather than planning policy, sufficient to justify the imposition of conditions”.

This is clearly not the case with WBC where bold housing targets for carbon emissions are stipulated under CS15 which was subject to extensive public consultation and was found sound by the planning inspector’s examination and subsequently adopted by the Council in 2012. As such it is very much a material planning consideration which in light of the Council’s subsequent declaration of a Climate Emergency and the Prime Minister’s own commitment to significantly reduce carbon emissions by 2035 cannot simply be dismissed as guidance. Under CS15 it stipulates for Residential Developments:

- A 10% reduction in CO₂ emissions;
- from 2014: A 20% reduction in CO₂ emissions;
- from 2016: Zero Carbon

Instead of recognising in their new builds that housing is now the biggest contributor to carbon emissions in this country, Bloor Homes continue to put up sub-standard homes as if somehow they are in a climate bubble impervious to the climate emergency to which they are a significant contributor. Without ensuring that at the least a development on this scale should meet those obligations then this appeal should be refused.

3) Air Quality

The tragic case of Ella Adoo-Kissi-Debrah where the Coroner ruled that air pollution was a significant contributory factor in her death means that we can no longer ignore the impact traffic pollution is having on our young peoples' health: air pollution is estimated to be a contributing factor of anywhere between 30k to 60k deaths a year.

It is therefore striking that in the proposals laid out, as endorsed by WBC, all major access roads have been designed to run by either to be built or existing primary schools. An argument may be made that this is an issue of today but as we move to an all electric future the issue is mitigated. However there is a growing body of research that shows particulate matters PM2.5 and PM10s thrown out by road erosion, tyre debris and brake dust, will get worse as we move to larger, heavier vehicles as is inevitable with fashion for SUVs and their heavier electric counterparts. Research shows that these particle matters are a significant contributor to the rise of respiratory diseases especially in the young but can also impact on mental well being as well. As such to design in a development that is totally car dependent where those cars will be passing in the rush hour children and young families on their way to school is an act of gross negligence on the part of planners and the appellants.

We would remind all parties that this is a risk that was well appreciated the last time consideration of Sandleford came under a planning inspector when

he considered the access route through Warren Road to the Andover Road and its potential impact on existing school children on their way to primary and secondary schools in the area, made worse by low lying footpaths that put young pedestrians at head height to stationary traffic that would build up around such a junction. To mitigate such risk he stipulated that in order to find the Core Strategy sound significant modifications needed to be made and in the case of Sandleford it was that Warren Road should be restricted to a sustainable link to the Andover Road for *pedestrians, cyclists and buses* as indeed had been promoted by the site sponsors. To seek to make this road now an all vehicular route goes against the Core Strategy and would instantly make it unsound.

Not only that but at the time the Planning Inspector was reviewing the Core Strategy there was no hint that another route to the A339 would take it directly by a primary school and near a special needs school, although the third route to the north to Monks Lane would be directly by a newly built primary school.

These are material considerations and until all the access roads to the development are resolved planning cannot be given the go ahead and it is why it is so important that in going for outline planning it should give a holistic view of the entire site including those access routes that are highly contentious. This is why the Core Strategy as stipulated by the Planning Inspector calls for a single outline planning application for the whole site - a stipulation that the site promoters were willing to sign up to.

As such, even if the Planning Inspector and Secretary of State were to overrule objections on environmental and climate change grounds, they cannot ignore the fact that by design this proposed development puts existing and future generations of school children in harms way by plaguing their school routes and school grounds with the pollution from in the early days construction traffic and as the development rolls out from rush hour and ongoing traffic congestion at the junctions where school grounds neighbour. So on air quality grounds alone the appeal should be refused.

4) Other Matters

There are many other matters that should be taken into consideration that others are better qualified than me to address, however I would point to two areas that have been raised as concerns with me:

Sewage Disposal

My understanding is that waste from the development is to be pumped up the hill before flowing down to a to be built holding tank by Newbury/ Thatcham sewage works. This holding tank is to be of sufficient storage to avert any problems that may occur at the works spilling over to wider problems for the surrounding community. However the question has been asked what happens if the pumping station at the top of the hill fails? What contingency measures are in place to ensure overflows do not get discharged into the pristine River Enborne?

Sports Provision

At the public enquiry held during the planning inspectors consideration of the Core Strategy, it was noted that in order to deliver the site that a triangle of land needed to be acquired off the Rugby Club which would deprive the club of the use of one of its pitches. We were assured that adequate compensation would be made that would ensure a replacement pitch could be provided. It is noted as a matter of record that in September 2016 the corner of land was fenced off by the appellants with no compensatory land adjustments - depriving the club of use of the pitch while the acquired land lies fallow. My understanding is that the majority of this land is now to be returned to the club by way of mitigation to allow restitution of the pitch however this does not expand the capability of the club which WBC is looking to make a community hub for sport. For this vision to be realised more land should be given over to the club to compensate for the current under provision of pitches in West Berkshire.

Conclusion

Sustainability is a word much used in planning parlance and is used to justify a lot of development that to the layman appears to be anything but sustainable. For all the clever words and money poured into this development we should not be beholden in 2021 to decisions made back in 2010. A development built on top of a long hill where the bulk of it lies over 2km away from the train station and over 2.5km from the town centre and

over 3km from the main local employment centres is not an urban extension in common parlance. There is no cycle network for this development to piggy back on, the sole designated cycleway is Monks Lane, a route shared with pedestrians that is less than 1m wide in places and totally impassable during school drop off and pick up times. The only designated cycle route to town is at the bottom of Andover Road near St John's roundabout, a route that is permanently blocked by cars permitted to park on it. The proposed bus routes are circular and meandering that run near empty most of the day and are unlikely to encourage new users especially given the price of a one way journey into town. The traffic projections do not appear to take into account the impact of when the development is completed, construction traffic that will blight a primarily residential area or the impact of major developments on neighbouring towns to the south of Newbury, nor do they appear to take into account the existing congestion that exists even during lockdown in all roads leading through Wash Common and the inevitable negative consequences that has on all road users including pedestrians. Moreover WBC are now seeking to build a 1,000 capacity football ground on Monks Lane to open as soon as March 2022 that will vie with other week-end traffic in a heavily congested area. Modelling for that has not been built into any of the traffic assumptions of the area and has yet to be developed.

To build a development in the 21st Century in an environmentally sensitive area that is car dependant goes against all the commitments that this Government has made and existing planning policies and as such there should be no option but to refuse the appeal but more over to instruct WBC to find alternative sites for development that does not threaten what is acknowledged to be a scarce resource in this country: namely the biodiversity attached to our Ancient Woodlands, and that does not threaten the future health of our children.