

Planning Appendix NG1

Inconsistencies and Contradictory Information

Town and Country Planning Act 1990 Section 78 appeal against the refusal of planning permission

Witness: Nikolaos Grigoropoulos BSc (Hons) MA MRTPI

Subject of Evidence: Planning

Appeal: APP/W0340/W/20/3265460

Site: Sandleford Park, Newtown Road, Newbury

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

Date: 07 April 2021

Council Reference: 20/01238/OUTMAJ



West Berkshire
C O U N C I L

Inconsistencies and Contradictory Information

This list is not exhaustive.

| Item No. | Document Title | Reference / Date | Issue | Resolved by Wheatcroft Proposals? |
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| 1. | Land Use and Access Parameter Plan | 14.273/PP02 Rev H1 | No emergency access from the A339 to run adjacent to the public right of way is shown as proposed in Appendix E of the Transport Assessment submitted. | N |
| 2. | Land Use and Access Parameter Plan | 14.273/PP02 Rev H1 | The area of land proposed for the expansion of Park House School is larger than that proposed on the Strategic Landscape and Green Infrastructure Parameter Plan submitted (drawing number 04627.00005.16.632.13). | N |
| 3. | Land Use and Access Parameter Plan | 14.273/PP02 Rev H1 | Two 'All Traffic Modes' access points onto Monks Lane are proposed whereas the Monks Lane access plans submitted (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane. | N |
| 4. | Land Use and Access Parameter Plan | 14.273/PP02 Rev H1 | The Land Use and Access Parameter Plan proposes a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. Section 4.5.1 of ES Vol. 3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3 rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states '....public access will be excluded' for reasons of protection of sensitive flora and fauna. The Illustrative Layout Plan (drawing number 171) does not show any access provision to any of the woodlands. | N |
| 5. | Land Use and Access Parameter Plan | 14.273/PP02 Rev H1 | A main access road extending to the east of Crooks Copse is shown but this is not proposed on the Strategic Landscape and Green infrastructure Parameter Plan (drawing number 04627.00005.16.632.13). | N |
| 6. | Green Infrastructure Parameter Plan | PP03 Rev G1 | The Green Infrastructure Parameter Plan proposes a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. Section 4.5.1 of the ES Vol.3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3 rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states '....public access will be excluded' for reasons of protection of sensitive flora and fauna. The Illustrative Layout Plan (drawing number 171) does not show any access provision to any of the woodlands. | N |

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| 7. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Scale bar does not reflect scale stated. | N |
| 8. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | The western access onto Monks Lane and main access road leading from it is shown with a significant area of green amenity space in the location of a green link, as is depicted in the Green Infrastructure Parameter Plan submitted (drawing number PP03 Rev G1). The submitted Illustrative Layout plan (drawing number 171) demonstrates that there is little scope for maintaining a green link in this location. | N – The visibility splay plans submitted under Wheatcroft demonstrate further the limited scope for planting in this area. |
| 9. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Pedestrian access points along south-western boundary with New Warren Farm (Sandleford Park West) differ in location to that shown on Land Use and Access Parameter Plan submitted (drawing number PP02 Rev H1). | N |
| 10. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Position of access (and green link) exiting Gorse Covert in a northerly direction differs from that shown on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1). | N |
| 11. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Proposes trees T218, T219, T220, T221, G223, T230 and T232 to be removed whereas the submitted ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement - drawing number. BC12 and Appendix 2 'Tree Schedule' submitted proposes those trees to be retained along the north-western boundary of the site adjacent to Monks Lane. | In part although T221 is not identified in table 1 of amended ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement, but is now shown as being removed in Appendix 2 – Tree Schedule and drawing number B13a. |
| 12. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Proposes a dedicated recreational route running north from Gorse Covert whereas the submitted Land Use and Access Parameter Plan submitted (drawing number PP02 Rev H1) does not show any route running northwards from Gorse Covert. | N |
| 13. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Proposes trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be retained despite a number of those trees requiring removal to accommodate a proposed access whereas they are proposed to be removed in ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement. | N – Wheatcroft Amended AIA now identifies G247 to be removed which is not a group but a single tree as identified in the tree schedule. |
| 14. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Proposes five trees to be removed along the line of the Crooks Copse Link road whereas ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement Drawing no. BC12 does not identify those five trees, or that there are to be removed. | N |
| 15. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16 .632.13 | Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F). | Possibly depending on detailed design of alternative options proposed in Appendix 4 of the appellants' |

| | | | | Wheatcroft proposals in their Statement of Case. |
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| 16. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16.632.13 | The existing public right of way through the appeal site is proposed to be upgraded to a shared 3m wide path and cycle link contrary to that stated in Appendix E of the Transport Assessment submitted. | N |
| 17. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16.632.13 | Note 2 on this plan advises that ancient woodland areas are to be retained with 15m buffer. Note 1 on this plan confirms that Gorse Covert and Brickkiln Copse are not designated ancient woodlands. Other application documents submitted, including the Environmental Statement, Design and Access Statement and Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) advise that all existing woodland, including non-designated ancient woodland, will be retained with a 15m buffer. | N |
| 18. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16.632.13 | The submitted SLGI Plan (drawing number 04627.00005.16.632.13) proposes public access routes through Gorse Covert, High Wood, Barn Copse, Dirty Ground Copse, Waterleaze Copse and Slockett's Copse. Section 4.5.1 of the ES Vol. 3 Appendix F18 (EMMP) states that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3 rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states '....public access will be excluded' for reasons of protection of sensitive flora and fauna. The Illustrative Layout Plan (drawing number 171) does not show any access provision to any of the woodlands. | N |
| 19. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16.632.13 | No green link is shown running north and then west from Gorse Covert, or running to east to west south of Monks Lane, as is proposed on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1). | N |
| 20. | Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) | 04627.00005.16.632.13 | No main access road extending to the east of Crooks Copse is shown as is proposed on the Land Use and Access parameter plan (drawing number 14.273/PP02 Rev H1). | N |
| 21. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Scale bar does not reflect scale stated. | N |
| 22. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | This plan does not show the green link running north and then west from Gorse Covert, or running to east to west south of Monks Lane, as proposed on the submitted Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) or the green links within the remainder of the allocated site as shown on the submitted Combined Green Infrastructure Parameter Plan (drawing number PP03 Rev H). | N |
| 23. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | The area of land safeguarded for the expansion of Park House School within the appeal site differs to that shown in the other parameter plans and combined parameter plans submitted. | N – the difference in area of land is increased by the Wheatcroft proposals |
| 24. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | An existing track/footpath running north to south at the eastern end of the country park is proposed to be retained in this plan but is not shown as being retained in the submitted Land Use and Access Parameter Plan (drawing number PP02 Rev H1) or the Combined Land Use and Access Parameter Plan (drawing number PP02 Rev I) submitted. | N |

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| 25. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | The existing public right of way through the appeal site is proposed to be upgraded to a shared 3m wide path and cycle link contrary to that stated in Appendix E of the Transport Assessment submitted. | N |
| 26. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Note 2 on this plan advises that ancient woodland areas are to be retained with 15m buffer. Note 1 on this plan confirms that Gorse Covert and Brickkiln Copse are not designated ancient woodlands. Other application documents submitted, including the Environmental Statement, Design and Access Statement and Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) advise that all existing woodland, including non-designated ancient woodland, will be retained with a 15m buffer. | N |
| 27. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | The hedgerow and amenity land proposed directly to the east of New Warren Farmhouse (in the remainder of the allocated site) is different in size/shape to that shown on the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). | N |
| 28. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | An area of amenity land is shown to the rear of properties known as Lynwood and Aston House that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I). | N |
| 29. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | An area of amenity land is shown either side of the driveway leading to Wildwoods that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I). | N |
| 30. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | An area of amenity land is shown along the southern boundary of the remainder of the allocated site and the western boundary of the Sanfoin area of the remainder of the allocated site that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). Also contrary to the Combined Land Use and Access Parameter Plan submitted by the appellants (drawing number PP02 Rev I). | N |
| 31. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Proposes trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be retained despite a number of those trees requiring removal to accommodate a proposed access whereas they are proposed to be removed in ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement. | N – Wheatcroft Amended AIA now identifies G247 to be removed which is not a group but a single tree as identified in the tree schedule. |
| 32. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Proposes trees T218, T219, T220, T221, G223, T230 and T232 to be removed whereas the submitted ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement - drawing number. BC12 and Appendix 2 'Tree Schedule' submitted proposes those trees to be retained along the north-western boundary of the site adjacent to Monks Lane. | In part although T221 is not identified in table 1 of amended ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement, but is now shown as being removed in Appendix 2 – Tree Schedule and drawing number B13a. |

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| 33. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Proposes five trees to be removed along the line of the Crooks Copse Link road whereas ES Vol. 3 Appendix G11a – Arboricultural Assessment and Method Statement Drawing no. BC12 does not identify those five trees, or that there are to be removed. | N |
| 34. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F). | Possibly depending on detailed design of alternative options proposed in Appendix 4 of the appellants' Wheatcroft proposals in their Statement of Case. |
| 35. | Combined Strategic Landscape and Green Infrastructure (SLGI) Plan | 04627.0005.16.633.14 | A break in the tree/hedgerow is shown at the northern end of Brick Kiln Copse is shown that is not proposed in the Green Infrastructure Parameter Plan (drawing number PP-06 Rev F) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). This break is clearly required to enable access into the western area of the remainder of the allocated site but is shown as amenity grassland on this plan. | N |
| 36. | Combined Building Heights Parameter Plan | PP04 Rev H | Does not detail the height in metres as is shown on the Building Heights Parameter Plan submitted (drawing number PP04 Rev G1). | N |
| 37. | Combined Green Infrastructure Parameter Plan | 14.273/PP03 Rev H | A significant element of green infrastructure - the tree lined track to the property known as Wildwoods within the remainder of the allocated site – is not shown on this plan but is shown on the Combined Strategic Landscape and Green Infrastructure (SLGI) Plan (04627.0005.16.633.14) submitted and within the Green Infrastructure Plan submitted by the applicants for the remainder of the allocated site (drawing number PP-06 Rev F, 18/00828/OUTMAJ). | N |
| 38. | Combined Green Infrastructure Parameter Plan | 14.273/PP03 Rev H | Proposed key footpath and cycle links between the appeal site and the remainder of the allocated site are denoted by pink arrows. However, the Access Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) denote those points as pedestrian access points only. | N |
| 39. | Combined Green Infrastructure Parameter Plan | 14.273/PP03 Rev H | No buffer is shown to the western edge of Gorse Covert as is shown for all other woodlands within the allocated site and also shown on the Combined Land Use and Access Parameter Plan submitted (drawing number PP02 Rev I). | N |
| 40. | Combined Land Use and Access Parameter Plan | PP02 Rev I | The proposed buffer to the western edge of Gorse Covert is located within the development area of the proposed primary school. | N |
| 41. | Combined Land Use and Access Parameter Plan | PP02 Rev I | The proposed Park House School Expansion land within the remainder of the allocated site differs in size from that proposed in the application for the remainder of the allocated site (18/00828/OUTMAJ, Land Use Parameter Plan – 01, drawing number PP-01 Rev B). This plan also omits an area of public open space between the expansion land and the public right of way to the north which is shown on the submitted Combined Green Infrastructure Plan (drawing number 14.273/PP03 Rev H). | N |
| 42. | Combined Land Use and Access Parameter Plan | PP02 Rev I | Proposed key footpath and cycle links between the appeal site and the remainder of the allocated site are denoted by pink arrows. However, the Access Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) denote those points as pedestrian access points only. | N |

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| 43. | Combined Land Use and Access Parameter Plan | PP02 Rev I | Existing tree lined access to property known as Wildwoods is not shown on this plan as is shown on the Access and Movement Parameter Plan (drawing number PP-02 Rev C) submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ). | N |
| 44. | Illustrative Layout Plan | 171 | The existing track to be retained, continuing on from Newbury College and south of the public right of way, as shown on the submitted SLGI Plans (combined and individual, drawing numbers 04627.00005.16.632.13 & 04627.00005.16.633.14) is not shown on this plan. | N |
| 45. | Illustrative Layout Plan | 171 | Tree (T76) is to be removed as advised in ES Vol. 3 Appendix G11a but is shown as being retained on this plan. Three trees are proposed adjacent to the valley crossing (south-eastern edge of crossing) that would not be possible due to proposed design of the embankment crossing (Transport Assessment, Appendix F). | N |
| 46. | Parcelisation Plan | PP05 Rev B | The size/areas of parcels shown for DPN1 and DPN2 differ from those shown on the Country Park Phasing Plan submitted (drawing number 04627.00005.16.306.15). | N |
| 47. | Planning Statement | May 2020 Issue A | Para. 1.4 advises that there are to be two points of access onto Monks Lane. The Monks Lane access drawings (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane. | N |
| 48. | Planning Statement | May 2020 Issue A | Para. 1.19 proposes 1.62 ha of land for the expansion of Park House School. Table 4 proposes up to 1.62ha for the extension of Park House School. Appendix 3 advises that 1.62 ha (16,233 sqm) is to be added to the existing school site area. The Land Use and Access Parameter Plan (drawing number PP02 Rev H1) proposes approximately 16,0074sqm or 16.0074ha. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes approximately 9,421sqm or 0.9421ha. The Memorandum of Understanding submitted proposes the transfer of up to 1.6ha of land for the extension of Park House School. ES Vol. 1 Chapter 4 (Proposed Development) states in table 4.1 that up to 1.6ha is to be safeguarded for the expansion of Park House School. The draft S106 agreement submitted with the application (S106 UU submitted at appeal) states 'no less than 1.6ha'. | N – the difference in area of land is increased by the Wheatcroft proposals |
| 49. | Planning Statement | May 2020 Issue A | Para. 3.13 states that existing trees within Development Parcel North 2 (DPN2) are to be retained with additional planting also. The submitted SLGI Plan (drawing number 04627.00005.16.632.13) proposes the removal of 5 trees within DPN2 and no additional planting. | N |
| 50. | Planning Statement | May 2020 Issue A | Table 6 - 1st objective - states that the housing mix is to be fixed in accordance with table 7 but no table 7 provided. | N |
| 51. | Planning Statement | May 2020 Issue A | Table 5 provides combined plan references that show how the remainder of the allocated site is to be developed. The Combined Strategic Landscape and Green Infrastructure Plan submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) is a different drawing number (04627.00005.16.633.15) to that detailed in this table (04627.00005.16.633.14). The Combined Green Infrastructure Parameter Plan submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) and the applicants for this application is a different drawing number (PP03 Rev H) to that detailed in this table (PP02 Rev H). | N |

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| | | | The Combined Building Heights Parameter Plan submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) and the applicants for this application is a different drawing number (PP04 Rev H) to that detailed in this table (PP02 Rev H). | |
| 52. | Planning Statement | May 2020 Issue A | Appendix 1 advises that the Main Access Road plan drawing number 14.273 298 has been provided. The Main Access Road plan provided with the application is drawing number 14.273/928 Access Road Plan. | N |
| 53. | Planning Statement | May 2020 Issue A | Appendix 1 lists advises that the Combined Strategic Landscape and Green Infrastructure Parameter Plan submitted is drawing number 04627.00005.16.632.14. The Combined Strategic Landscape and Green Infrastructure Parameter Plan submitted with the application is drawing number 04627.00005.16.633.14. | N |
| 54. | Planning Statement | May 2020 Issue A | Appendix 3 – IDP Park House School Feasibility Study – Plan of proposed sports playing field appears to breach the 15 metre buffer to the ancient woodland of Barn Copse. | N – proposed earthworks required to level land appear to be within the 15 metre woodland buffer although the information submitted is inadequate to demonstrate no impact on buffer. |
| 55. | Planning Statement | May 2020 Issue A | Appendix 3 – IDP Park House School Feasibility Study – Area of expansion land denoted by thick grey line differs from that shown on the submitted Land Use and Access Parameter Plan (drawing number PP02 Rev H1), Green Infrastructure Parameter Plan (drawing number PP03 Rev G1), Building Heights Parameter Plan (drawing number PP04 Rev G1) and SLGI Plan (drawing number 04627.00005.16.632.13) as well as the combined parameter plans submitted. | N – the difference in area of land is increased by the Wheatcroft proposals |
| 56. | Design and Access Statement | February 2020, Issue 8 | Figure 33, Section 3.2 and Figure 35 identifies and proposes a green link directly westwards from Gorse Covert into the remainder of the allocated site. The proposed green link from Gorse Covert in the submitted Green Infrastructure Parameter plan (drawing number PP03 Rev G1) runs northwards from the woodland before turning westwards into the remainder of the allocated site. | N |
| 57. | Design and Access Statement | February 2020, Issue 8 | Section 4.2.1 states that the development will be supported by c57.58ha (142.28 acres) of Country Park. Section 5.1.1 advises that 84.04ha (207.67 acres) of country park will be delivered. | N |
| 58. | Design and Access Statement | February 2020, Issue 8 | Figure 44 provides a copy of the SLGI plan submitted (drawing number (04627.00005.16.632.13) which contains all of the inconsistencies identified above. | N |
| 59. | Design and Access Statement | February 2020, Issue 8 | Section 7.2.3 advises in key 4 that for details of informal landscape character along woodland buffers refer to SLGI plan. SLGI plan (drawing number 04627.00005.16.632.13) does not show the extent of those buffers nor any detail on the informal landscape character of those buffers. | N |
| 60. | Transport Assessment | March 2020 | Appendix E proposes a cycleway that diverges from the existing path to go around trees to enable emergency access. This is not shown on any of the parameter plans submitted. | N |
| 61. | Transport Assessment | March 2020 | Para. 2.4 advises the site is approximately 1.8km from Newbury town centre. Para. 2.17 advises the site is under 2km from Newbury town centre. Para. 2.23 advises the railway station is approximately 2.3km from the site. Table 2.1 of TA and travel plan advises the railway station is approximately 2km from the nearest proposed access. ES Chapter 13 – Transport – page 13-9 advises the site is 3km from the railway station (located at the southern edge of the town centre, closer to the appeal site than the town centre). | N |

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| 62. | Transport Assessment | March 2020 | Appendix M – Travel Plan. Para. 1.7 Para. 1.7 considers that the overarching principles within this travel plan will also be implemented to SPW (the remainder of the allocated site outside of this application) but does not detail how. Objectives and Targets set out in this travel plan differ to those provided in the Travel Plan submitted by the applicant for the remainder of the allocated site (18/00828/OUTMAJ). | N |
| 63. | Transport Assessment | March 2020 | Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix G7 (LGIDMP) advises in para. 2.15 that no lighting is proposed within the country park. ES Vol. 3 Appendix F20 (Lighting Assessment) - No lighting is proposed or assessed within the country parkland. | N |
| 64. | Memorandum of Understanding (unsigned) | Dated 6 th May 2020 | Drawing number 04627.0005.16.633.14 is stated as being the agreed Combined Strategic Landscape and Green infrastructure Plan however the applicants for the remainder of the allocated site (18/00828/OUTMAJ) have submitted drawing number 04627.0005.16.633.15 as the Combined Strategic Landscape and Green infrastructure Plan, as shown in their own Memorandum of Understanding (signed and dated 10 th June 2020). The details contained within Appendix 2 also differ to the Memorandum of Understanding submitted by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) | N |
| 65. | Affordable Housing Statement | May 2020, Issue A | Para. 1.3 advises of two points of access onto Monks Lane. The Monks Lane access drawings (drawing numbers 172985.A.07.1 and 172985.A.8) propose three vehicular accesses onto Monks Lane. | N |
| 66. | ES Non-Technical Summary | March 2020, ref: 2017.013 | Page 8, figure 4 shows an illustrative masterplan that is not the same as that provided with the application (drawing number 171). | N |
| 67. | ES Non-Technical Summary | March 2020, ref: 2017.013 | Page 9, figure 5 shows a Land Use and Access Parameter Plan that is not the same as the one submitted with the application (drawing number PP02 Rev H1). | N |
| 68. | ES Vol. 1 Main Text Chapter 4 (Proposed Development) | 2017.013.004c | States in table 4.1 that up to 1.6ha is to be safeguarded for the expansion of Park House School. Para. 1.19 of the submitted Planning Statement proposes 1.62 ha of land for the expansion of Park House School. Table 4 of the submitted Planning Statement proposes up to 1.62ha for the extension of Park House School. Appendix 3 of the submitted Planning Statement advises that 1.62 ha (16,233 sqm) is to be added to the existing school site area. The Land Use and Access Parameter Plan (drawing number PP02 Rev H1) proposes approximately 16,0074sqm or 16.0074ha. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes approximately 9,421sqm or 0.9421ha. | N – the difference in area of land is increased by the Wheatcroft proposals |
| 69. | ES Vol. 1 Main Text Chapter 6 (Ecology) | 2017.013.024c | Page 6-22 'Bats' – states that no trees with confirmed bat roosts are to be lost yet then states trees T127 and T130 - which are confirmed bat roosts according to ES Vol. 3 Appendix F7 (section 3.2 and Table 3 and Figure 3) - are to be removed or pollarded as per arboricultural assessment. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Also noted on page 6-30 that no roosting trees are to be removed yet arboricultural assessment (ES Vol. 3 Appendix G11a says otherwise). Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a. | N |
| 70. | ES Vol. 1 Main Text Chapter 6 (Ecology) | 2017.013.024c | Section 6.4.2 (penultimate bullet point) considers hedgerows A and F are classed as important under the Hedgerow Regulations whereas ES Vol. 3 Appendices F1 (Section 3.2.4) and F18 (section 2.1.4) advise that it is hedgerows A and E. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main |

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| | | | | Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 71. | ES Vol. 1 Main Text Chapter 6 (Ecology) | 2017.013.024c | Section 6.5.3 considers hedgerows C and H are to be improved/infilled by planting whereas Appendix F18 (section 3.4.1) advises that it is hedgerows B and F. | N |
| 72. | ES Vol. 1 Main Text Chapter 6 (Ecology) | 2017.013.024c | Section 6.5.1 considers the road crossing to be elevated to reduce impacts on grassland and wetland habitat, however the solution provided is an embankment with a culvert (Transport Assessment, Appendix E, ES Vol. 1 Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9). | N |
| 73. | ES Vol. 1 Main Text Chapter 6 (Ecology) | 2017.013.024c | Page 6-28 'Species-Rich Hedgerows' – states that c.521m of hedgerow is to be removed. ES Vol. 3 Appendix F10 (Dormouse Survey, section 5.1) advises that a total length of 501m of hedgerow will be lost. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 74. | ES Vol. 1 Main Text Chapter 7 (Landscape) | 2017.013.016c | Page 7-20 considers the public right of way through site will be upgraded to be a shared footpath and cycle link, 3m in width. This is contrary to that proposed in Appendix E of the submitted Transport Assessment. | N – the Wheatcroft proposals now refer to a 3m wide emergency access which is also contrary to the 4m wide emerge access proposed in Appendix E of the Transport Assessment. |
| 75. | ES Vol. 1 Main Text Chapter 7 (Landscape) | 2017.013.016c | Page 7-9 refers to the location of veteran trees identified in the corresponding arboricultural survey undertaken by Barrell Tree Consultancy provided in appendix G11 and shown in Figure 7.5. Note 4 of Figure 7.5 (ES Vol. 2 Figures) refers to the Barrell Tree Consulting Assessment (March 2012) but the Barrell Tree Consulting Assessment submitted in G11a is dated January 2020 not March 2012. | N |
| 76. | ES Vol. 1 Main Text Chapter 7 (Landscape) | 2017.013.016c | Page 7-10 refers to historic landscape feature shown on Figure 7.5. One of the features shown in ES Vol. 2 Figure 7.5 is the historic track that runs from the A339 along the prow and along Warren Road. This contradicts the submissions made in the ES by the applicant for the remainder of the allocated site (18/00828/OUTMAJ) which considers that Warren Road is not a historic feature. | N |
| 77. | ES Vol. 2 Figure 7.5 (Historic landscape Features) | 04627.00005.16 .605.0 | This figure refers to the Barrell Tree Consulting Assessment (March 2012) in note 4 however the Barrell Tree Consulting Assessment submitted is dated January 2020 not March 2012. | N |
| 78. | ES Vol. 2 Figure 7.7 (Country Park Phasing Plan) | 04627.00005.16 .306.15 | The development parcels for DPN1 and DPN2 are not the same as those shown in the Parcelisation Plan (ES Vol. 2 Figure 4.5) | N |

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| 79. | ES Vol. 1 Main Text - Chapter 9 (Cultural Heritage) | 2017.013.018c | Section 9.7.1 considers that Warren Road forms the western end of a non-designated historic routeway, contrary to that considered in the ES submission for application 18/00828/OUTMAJ currently being considered for that application. | N |
| 80. | ES Vol. 1 Main Text - Chapter 12 (Utilities) | 2017.013.020c | Section 12.1 and Page 12-9 refer to an 80 bed care home. | N |
| 81. | ES Vol. 1 Main Text - Chapter 13 (Transport and Accessibility) | 2017.013.022c | Section 13.3.2 – <i>Assessment Years</i> (page 13-2) considers that the development will be complete by 2031 and this is why an assessment at 2031 has been undertaken. Section 13.6.2 – <i>Construction Phase</i> (page 13-14) states that proposed development is to be constructed over an approximate 14 year period up to 2033. Section 13.6.2 – <i>Occupation Phase</i> (page 13-15) states that 2031 corresponds to the anticipated end of construction of the development. The ES Non-Technical Summary submitted (page 10) considers that construction will last approximately 10 years and ES Chapter 14 (Noise) considers occupation in 2031. | N |
| 82. | ES Vol. 2 Figure 13.3 – Improvements to the Cycle Network | Figure 13.3 | Shows a proposed cycleway along Andover Road from Warren Road to Buckingham Road as part of the improvements to the cycle network as a result of the Bloor Homes/SFP development (as confirmed in section 13.5.3 of ES Vol. 1 Chapter 13). Figure 6 of the submitted Transport Assessment also shows a proposed cycleway along Andover Road from Warren Road to Buckingham Road as part of the improvements to the cycle network as a result of the Bloor Homes/SFP development. However, the Transport Assessment submitted details in table 4.1 that this is to be provided by the applicants for the remainder of the allocated site (18/00828/OUTMAJ) not Bloor Homes/SFP. | N |
| 83. | ES Vol. 3 Appendices – D1 (Draft Construction and Environmental Management Plan, CEMP) | March 2020, 2017.013.005b | Table 6.1, item LV3 refers to ES Figure 4.2 as showing the locations of early/structure planting. ES Vol. 2 Figure 4.2 is the Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) which does not show the locations of any early/structure planting. | N |
| 84. | ES Vol. 3 Appendices – F1 (Ecological Appraisal) | February 2019, Rev 2 | Refers to NPPF 2018, the latest version is 2019. | N |
| 85. | ES Vol. 3 Appendices – F7 (Bat Roost Assessment) | February 2019, Rev 3 | Section 3.2, Table 3 and Figure 3 confirms trees T127 and T130 are active bat roosts to be retained yet the arboricultural assessment submitted with application (ES Vol. 3 Appendix G11a) proposes those trees to be removed or pollarded. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a. | N |
| 86. | ES Vol. 3 Appendices – F7 (Bat Roost Assessment) | February 2019, Rev 3 | Table 3 advises that tree T48 has ow bat roost potential. Figure 3 does not identify tree T48. | N |
| 87. | ES Vol. 3 Appendices – F7 (Bat Roost Assessment) | February 2019, Rev 3 | Figure 3 – Plotted locations of trees T46 and G47 is in different locations to that shown in ES Vol. 3 Appendix F18 (EMMP) Figure 2. | N |
| 88. | ES Vol. 3 Appendices – F8 (Bat Emergence/ Return Survey) | February 2019, Rev 3 | Section 5.1 confirms trees T127 and 130 are active bat roosts to be retained yet the arboricultural assessment submitted with application (ES Vol. 3 Appendix G11a) proposes those trees to be removed or pollarded. This section then goes on to consider that the removal of those trees do not form part of the proposals, but they are as set out in the arboricultural assessment as being removed. Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a. | N |

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| 89. | ES Vol. 3 Appendices – F9 (Bat Activity Report) | February 2019, Rev 2 | Section 6.1.5 advises that a bridge will cross the valley to maintain marshy habitat and bat foraging activity. However, an embankment with a culvert is proposed in the submitted Transport Assessment (Appendix F) and Section 5 of the Flood Risk Assessment submitted (ES Vol. 3 Appendix K1). | Possibly if one of the alternative options (VD17562-SK023 / VD17562-STR-SK-003) is considered acceptable, subject to consultation responses. |
| 90. | ES Vol. 3 Appendices – F10 (Dormouse Survey) | February 2019, Rev 3 | Section 5.1 advises that a total length of 501m of hedgerow will be lost contrary to Page 6-28 'Species-Rich Hedgerows' of ES Vol.1 Chapter 6 which advises that 521m will be lost. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 91. | ES Vol. 3 Appendices – F10 (Dormouse Survey) | February 2019, Rev 3 | Section 5.1 advises that portions of hedgerows G and F are to be removed, neither of which are considered as important under the Hedgerow Regulations. However, ES Vol. 1 Chapter 6 (Ecology), Section 6.4.2 advises that Hedgerow F is considered important under the Hedgerow Regulations. Section 3.2.4 of ES Vol. 3 Appendix F1 (Ecological Appraisal) and Section 2.1.4 of F18 (EMMP) advise that hedgerows A and E are considered as important under the Hedgerow Regulations. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 or ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 92. | ES Vol. 3 Appendices – F10 (Dormouse Survey) | February 2019, Rev 3 | Section 5.1 advises that figure 2 of ES Vol. 3 Appendix F18 (EMMP) shows the locations of hedgerows and subsequent proposed areas of removal. Figure 2 of ES Vol. 3 Appendix F18 (EMMP) does not identify those areas of hedgerow to be removed. | N |
| 93. | ES Vol. 3 Appendices – F12 (Terrestrial Invertebrate Survey) | February 2019, Rev 4 | Section 5.2 (1 st bullet point) recommends that all areas of marshy grassland will be retained to prevent breaching relevant wildlife legislation. Section 5.2 (2 nd bullet point) states that the road across the valley will have been designed as a bridge to allow for the retention of vegetation and associated species. Section 6.5.3 of ES Vol. 1 Chapter 6 (Ecology) advises that an area of marshy grassland will be lost. The proposed valley crossing is an embankment as shown in the submitted Transport Assessment (Appendix F) and ES Vol. 1 Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9. | N – whilst one of the alternative options (VD17562-SK023 / VD17562-STR-SK-003) may be considered acceptable, subject to consultation responses, the relevant parts of the ES have not been updated to correct and reassess the EIA. |

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| 94. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 2.1.4 advises that hedgerows A and E are considered important under the hedgerow regulations whereas ES Vol. 1 Chapter 6 (Ecology) Section 6.4.2 advises that it is hedgerows A and F. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 95. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 3.4.1 considers hedgerows B and F are to be improved/infilled by planting. Section 3.4.3 then states that hedgerows B, C, D, and G are to be infilled. ES Vol. 1 Chapter 6 (Ecology) section 6.5.3 advises that hedgerows C and H are to be reinforced/infilled. | N |
| 96. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 4.3.4 advises that a bridge is proposed across the valley to ensure the connectivity of the marshy grassland remains intact. The proposed valley crossing is an embankment as shown in the submitted Transport Assessment (Appendix F) and ES Vol. 1 Main Text Chapter 4 (Proposed Development) section 4.3.4 & ES Vol. 2 Figure 4.9. | N – whilst one of the alternative options (VD17562-SK023 / VD17562-STR-SK-003) may be considered acceptable, subject to consultation responses, the relevant parts of the ES have not been updated to correct and reassess the EIA. |
| 97. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 4.4 Confirms trees T127 and 130 are active bat roosts yet the arboricultural assessment submitted with application (ES Vol. 3 Appendix G11a) proposes those trees to be removed or pollarded. This section then goes on to consider that trees T127 and T130 may require some arboricultural works, but they are as set out in the ES Vol. 3 Appendix G11a as being removed. Important to note that ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a. | N |
| 98. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 4.5.1 advises that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.' 3 rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states '...public access will be excluded' for reasons of protection of sensitive flora and fauna. The submitted SLGI Plan (drawing number 04627.00005.16.632.13), Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) and the Land Use and Access Parameter Plan propose a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert. The submitted SLGI Plan (drawing number 04627.00005.16.632.13) also proposes public access routes through Gorse Covert, High Wood, Barn Copse, Dirty Ground Copse, Waterleaze Copse and Slockett's Copse. The Illustrative Layout Plan (drawing number 171) does not show any access provision to any of the woodlands. | N |
| 99. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 4.8.2 notes that tree T127 is confirmed as a potential nesting sites for barn owls and recognises that the submitted arboricultural assessment recommends felling that tree and if felled would require further surveys and recommendations to inform that work. ES Vol. 3 Appendix G7 advises that tree works are to be | N |

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| | | | in accordance with ES Vol. 3 Appendix G11a. Therefore that tree is proposed to be felled and so the recommendations are required now. | |
| 100. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Section 4.8.2 considers that the masterplan retains all of the trees identified as currently having potential or confirmed for nesting barn owl. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes tree T34 (confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5) to be removed as well as ES Vol. 3 Appendix G11a and the submitted Planning Statement (Appendix 3). ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a, including tree T127 (also confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5). Therefore trees T34 and T127 are proposed to be felled (contrary to section 4.8.2 of this document) and update surveys, appropriate avoidance, mitigation and enhancement measures, are required. | N |
| 101. | ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP) | February 2019, Rev 2 | Figure 2 – Plotted locations of trees T46 and G47 is in different locations to that shown in ES Vol. 3 Appendix F7 ((Bat Roost Assessment) Figure 3. | N |
| 102. | ES Vol. 3 Appendices – F20 (Lighting Assessment) | December 2019, Issue 4 | No lighting of the proposed playing field within the Park House School Expansion Land (Planning Statement, Appendix 3) is proposed in Figure 7 or assessed as shown in Figure 9 of this document. The submitted Planning Statement, Appendix 3 (IDP Park House School Feasibility Study) advises that the playing pitch is to be an 'all weather pitch' and as such will count twice toward the area calculated for soft outdoor PE. In order for the 'all weather pitch' to count twice towards the overall area for soft outdoor PE it will need to be lit in accordance with the 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts'. | N – furthermore the appellants have referred to the FA guide in the additional submission following the Wheatcroft proposals. |
| 103. | ES Vol. 3 Appendices – F20 (Lighting Assessment) | December 2019, Issue 4 | No details of the Technical Lighting Specifications are provided in Appendix B. | N |
| 104. | ES Vol. 3 Appendices – F20 (Lighting Assessment) | December 2019, Issue 4 | No lighting is proposed or assessed within the country parkland. Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix G7 advises in para. 2.15 that no lighting is proposed within the country park. | N |
| 105. | ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment) | February 2020, Rev 6 | Section 3.2.1 advises that hedgerows A and E are considered important under the hedgerow regulations whereas section 6.4.2 of ES Vol. 1 Chapter 6 (Ecology) advises that hedgerows A and F are important under the hedgerow regulations. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 1 Main Text Chapter 6 has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |
| 106. | ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment) | February 2020, Rev 6 | Table 12 states that 521m of hedgerow is to be removed. ES Vol. 3 Appendix F10 (section 5.1) advises that a total length of 501m of hedgerow will be lost. | Appellants agree that this is an inconsistency in the submitted ES but no updated ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals. |

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| 107. | ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment) | February 2020, Rev 6 | Appendix A of this document upon which this assessment is based (in part) provides an outdated illustrative layout plan that is not the one submitted with the application (drawing number 171). | N |
| 108. | ES Vol. 3 Appendices – F21 (Biodiversity Net Gain Assessment) | February 2020, Rev 6 | Table 9 refers to 0.25ha of new standing water provision, whereas Table 14 and Section 5.1 refer to 0.15ha of new standing water. | |
| 109. | ES Vol. 3 Appendices – G7(Landscape and Green Infrastructure Design and Management Plan, LGIDMP) | | Section 4.0 first bullet point advises that a new hedgerow to the south of playing fields will be part of the advanced planting proposals. No playing fields within the Country Park are proposed on the plans submitted and no hedgerow to the south of playing fields (which are not proposed) is shown as advanced planting on the SLGI Plan (drawing number 04627.00005.16.632.13) or the Country Park: Phasing Plan (drawing number 04627.00005.16.306.15) submitted with the application. | N |
| 110. | ES Vol. 3 Appendices – G7(Landscape and Green Infrastructure Design and Management Plan, LGIDMP) | | Section 8.10 advises that new native hedgerow planting will take place to enhance connectivity between Gorse Covert and Brick Kiln Copse. The combined SLGI plan submitted (drawing number 04627.00005.16.633.14) proposes no new hedgerow planting between those woodlands. | N |
| 111. | ES Vol. 3 Appendices – G7 (Landscape and Green Infrastructure Design and Management Plan, LGIDMP) | | Section 9.0 advises that non-ancient woodland will have a 10m buffer contrary to other submissions which advise that all woodlands will have a 15m buffer, such as: Appendix B of ES Vol. 3 Appendix G9 (Heritage and Landscape Assessment); Sections 6.5.1, 6.5.3 of ES Vol.1 Chapter 6 (Ecology); Section 7.5.1 of ES Vol. Chapter 7 (Landscape and Visual Impact); Sections 2.2.2 and 5.3.1 and figure 38 of the submitted Design and Access Statement. | N |
| 112. | ES Vol. 3 Appendices – G7 (Landscape and Green Infrastructure Design and Management Plan, LGIDMP) | | Para. 2.15 states that no lighting is proposed within the country park. Tables 8.1 of the Transport Assessment advises that lighting will be provided along the public right of way which runs through the country parkland. ES Vol. 3 Appendix F20 (Lighting Assessment) has no lighting is proposed or assessed within the country parkland. | N |
| 113. | ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment) | | Appendix B Development Principle L6 advises that a 3m wide shared footpath and cycle link is to be provided whereas the submitted Transport Assessment (Appendix E) proposes a 3m wide cycleway with a 1m wide soft margin and 1m wide grasscrete section separating the cycleway from the footpath. | N |
| 114. | ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment) | | Section 1.1 refers to a country park phasing plan drawing number 04627.00005.16.306 (Rev 10). The Country Park: Phasing Plan submitted is drawing number 04627.00005.16.306.15 | N |
| 115. | ES Vol. 3 Appendices – G9 (Heritage and Landscape Assessment) | | Appendix B, Development Principle L6 and P2 refers to ES Figure 4.3 as being the Combined SLGI plan. ES Figure 4.3 is not the Combined SLGI plan (drawing number 04627.00005.16.633.14) but the application site SLGI plan (drawing number 04627.00005.16.632.13). | N |
| 116. | ES Vol. 3 Appendices – G11a (Arboricultural Assessment and Method Statement) | 10 th January 2020, ref: 14281-AA7-CA | Table 3 advises that this assessment has considered the Land Use and Access Parameter Plan PP02 Rev A received on 19 th February 2018. The Land Use and Access Parameter Plan submitted is PP02 Rev H1 dated 3 rd February 2020. | N |
| 117. | ES Vol. 3 Appendices - G11a (Arboricultural | 10th January 2020, ref: 14281-AA7-CA | The Tree Protection Plans provided do not identify the five trees to be removed along the line of the Crooks Copse Link road as identified on the SLGI plan submitted (drawing number 04627.00005.16.632.13). | N |

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| | Assessment and Method Statement) | | | |
| 118. | ES Vol. 3 Appendices - G11a (Arboricultural Assessment and Method Statement) | 10th January 2020, ref: 14281-AA7-CA | The Tree Protection Plans provided and Appendix 2 'Tree Schedule' show trees T218, T219, T220, T221, G223, T230, T232 to be retained along the north-western boundary of the site adjacent to Monks Lane road whereas they are proposed to be removed on the SLGI plan submitted (drawing number 04627.00005.16.632.13). | Y – However, ES Vol. 1 Chapter 7 has not been updated to reassess the LVIA of the amended Appendix G11a upon which that EIA assessment is based. |
| 119. | ES Vol. 3 Appendices - G11a (Arboricultural Assessment and Method Statement) | 10th January 2020, ref: 14281-AA7-CA | The Tree Protection Plans provided and Appendix 2 'Tree Schedule' show trees T76, T127, T151, T154, T173, T246, T247, G47 (part), G68 (part), G108 (part) G117 (part), G234 (part), and G248 (part) to be removed whereas they are not proposed to be removed on the SLGI plan submitted (drawing number 04627.00005.16.632.13), despite a number of those trees requiring removal to accommodate a proposed access. | N |
| 120. | ES Vol. 3 Appendices – K1 (Flood Risk Assessment and Drainage Strategy) | 10309 FRA04 Rv1, Issue 1 | Appendix A - Proposed Drainage Strategy Plan (dwg. No. 10309-DR-02) misses the bottom edge of the application site which includes the River Enborne and an existing pond/watercourse as per the FRA submitted with the application. It also omits the remainder of the allocated site to demonstrate that the surface water flow within that site does not flow into this application site and therefore how each site is not dependent on the other in respect of surface water drainage. | Y – However, ES Vol. 1 Chapter 11 has not been updated to reassess the impact of the amended Appendix K1 upon which that EIA assessment is based. |

New Inconsistencies and Contradictory Information as a result of Wheatcroft Submissions

| Item No. | Document Title | Reference / Date | Issue |
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| 1. | Amended ES Vol. 3 Appendix G11a (Arboricultural Assessment and Method Statement) | 14281-AA8-CA, dated 9 th October 2020 | Table 1 refers to the removal of G247 but no G247 is shown in Appendix 2: Tree Schedule or in the Tree Protection Plans (BC13a). |
| 2. | Amended ES Vol. 3 Appendix G11a (Arboricultural Assessment and Method Statement) | 14281-AA8-CA, dated 9 th October 2020 | T221 is not identified in table 1 but is now shown as being removed in Appendix 2 – Tree Schedule and drawing number B13a. |
| 3. | Statement of Case Appendix 4: Valley Crossing Study | Issue A | Option VD17562-SK001 contrary to provision of a bridge as required in ES Vol. 3 Appendices – F9 (Bat Activity Report); ES Vol. 3 Appendices – F12 (Terrestrial Invertebrate Survey); ES Vol. 3 Appendices – F18 (Ecological Mitigation and Management Plan, EMMP). |
| 4. | Statement of Case Appendix 4: Valley Crossing Study | Issue A | The table in 3.1 indicates that the 3rd Option allows for the retention of T69, T77 and T78, this table then goes on to indicate that T69 will be removed. |

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| 5. | Statement of Case Appendix 5: Park House School Playing Field Scheme | 001-01122020B | <p>The extent of the proposed expansion land to accommodate an alternative playing field arrangement changes the amount and shape of land proposed which is different to that shown on the following submitted plans that have been used and considered through the EIA process in many areas of the EIA to assess the impacts of the proposal:</p> <ul style="list-style-type: none"> • Land Use and Access Parameter Plan (drawing number PP02 Rev H1); • Green Infrastructure Parameter Plan (drawing number PP03 Rev G1); • Building Heights Parameter Plan (drawing number PP04 Rev G1); • Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) (drawing number 04627.00005.16.632.13); • And the Combined plans of all of the above. |
| 6. | Statement of Case Appendix 5: Park House School Playing Field Scheme | 001-01122020B | <p>The proposed playing pitch is to be an 'all weather' pitch as stated in Appendix 3 (IDP Park House School Feasibility Study_ of the Planning Statement. The 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts' subsequently submitted by the appellants requires this pitch to be lit, fenced to a minimum of 4.5 metres in height and a larger area than that shown in this Wheatcroft proposal.</p> <p>ES Vol. 3 Appendix F20 (Lighting Assessment), upon which ES Vol. 2 Appendix F1 (Ecological Appraisal) and EX Vol. 1 Chapter 6 (Ecology) is based, proposes and assesses the playing pitch as having no lighting.</p> <p>Para. 7.5 of the 'Response to Comments for Consultees' document states that the new playing field proposed at Park House School does not include lighting.</p> |
| 7. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 2.8 proposes a 3m wide emergency access to run adjacent to public right of way and that it has been stated that a 3.75 metre bonded surface is required, both of which are contrary to that proposed in Appendix E of the Transport Assessment and neither proposal is shown on the following submitted plans that have been used and considered through the EIA process in many areas of the EIA to assess the impacts of the proposal:</p> <ul style="list-style-type: none"> • Land Use and Access Parameter Plan (drawing number PP02 Rev H1); • Green Infrastructure Parameter Plan (drawing number PP03 Rev G1); • Building Heights Parameter Plan (drawing number PP04 Rev G1); • Strategic Landscape and Green Infrastructure Parameter Plan (SLGI) (drawing number 04627.00005.16.632.13); • And the Combined plans of all of the above. |
| 8. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 5.11 considers that to accommodate the enlargement of Park House school contiguous with its boundary the loss of vegetation including tree T34 is unavoidable. A proposed scheme for the enlargement of Park House school that does not propose the removal of tree T34 has been provided in Appendix 5 to the Statement of Case.</p> |
| 9. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 7.5 states that the new playing field proposed at Park House School does not include lighting. The submitted Planning Statement, Appendix 3 (IDP Park House School Feasibility Study) advises that the playing pitch is to be an 'all weather pitch' and as such will count twice toward the area calculated for soft outdoor PE. In order for the 'all weather pitch' to count twice towards the overall area for soft outdoor PE it will need to be lit in accordance with the 'FA Guide to 3G Football Turf Pitch Design Principles and Layouts', subsequently submitted by the appellants after the Wheatcroft proposals.</p> |
| 10. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 7.10 confirms that section 6.4.2 of ES Vol. 1 Chapter 6 is inconsistent in terms of the hedgerows that are designated as important and that ES Vol. 3 Appendix F10 (Dormouse Survey) Section 5.1 advises that a total length of 501m of hedgerow will be lost contrary to Page 6-28 'Species-Rich Hedgerows' of ES Vol.1 Chapter 6 which advises that 521m will be lost. However, updated ES Vol. 1 Main Text Chapter 6 or ES Vol. 3 Appendix F10 (Dormouse Survey) has been submitted to correct and reassess the EIA as part of the Wheatcroft proposals.</p> |
| 11. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 7.17 considers that recreational routes through woodlands will be designed to avoid recreational disturbance of badger setts and where necessary will include fencing to prevent public access.</p> |

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| | | | <p>Section 4.5.1 of the ES Vol. 3 Appendix F18 (EMMP) advises that 'The [badger] setts within Crook's Copse, Gorse Covert, Slockett's Copse, and High Wood will not be directly impacted by the development as there are no proposed building works within 30m of these setts and there are no proposed plans to implement public access into these woodland blocks.'</p> <p>3rd paragraph of section 3.2.2 of the ES Vol. 3 Appendix F18 (EMMP) also states '...public access will be excluded' for reasons of protection of sensitive flora and fauna.</p> <p>The submitted SLGI Plan (drawing number 04627.00005.16.632.13), Green Infrastructure Parameter Plan (drawing number PP03 Rev G1) and the Land Use and Access Parameter Plan propose a key footpath/cycle link and potential future link to future 1FE school through the length of Gorse Covert.</p> <p>The submitted SLGI Plan (drawing number 04627.00005.16.632.13 proposes public access routes through Gorse Covert, High Wood, Barn Copse, Dirty Ground Copse, Waterleaze Copse and Slockett's Copse.</p> <p>The Illustrative Layout Plan (drawing number 171) does not show any access provision to any of the woodlands.</p> |
| 12. | Response to Comments for Consultees | September 2020, Issue B | <p>Para, 7.18 considers that if nesting is confirmed in tree T34 (confirmed as a potential Barn Owl nesting site) then the further mitigation set out in the EMMP will be required, including a barn owl nest box to be installed to the edge of each woodland parcel to provide alternative roosting sites.</p> <p>Section 4.8.2 of ES Vol. 3 Appendix F18 (EMMP) considers that the masterplan retains all of the trees identified as currently having potential or confirmed for nesting barn owl. The SLGI Plan submitted (drawing number 04627.00005.16.632.13) proposes tree T34 (confirmed as a potential Barn Owl nest in ES Vol. 3 Appendix F5) to be removed as well as ES Vol. 3 Appendix G11a and the submitted Planning Statement (Appendix 3) and the amended ES Vol. 3 Appendix G11a submitted as part of the Wheatcroft proposals. ES Vol. 3 Appendix G7 advises that tree works are to be in accordance with ES Vol. 3 Appendix G11a.</p> |
| 13. | Response to Comments for Consultees | September 2020, Issue B | <p>Para. 7.23 advises that provided the Country Park is operational upon first occupation there would be no significant impact on Greenham Common (SSSI) through recreation. The Country Park: Phasing Plan submitted (drawing number 04627.00005.16.306.15) proposes the provision of the Country Park in two phases with the later phase being delivered with DPC. Therefore the Country Park will not be operational upon first occupation.</p> |
| 14. | Response to Comments for Consultees | September 2020, Issue B | <p>Appendix 2: Flood Risk Assessment revised by Brookbanks – Para. 6.44 states 'Infiltration testing, to BRE365, was completed by GEG in November 2014 with seventeen trial pits completed across the site.'</p> <p>Page ii, Appendix C to the amended FRA under <i>Intrusive Investigation</i> states 'The intrusive investigation was undertaken on the 9th to 12th and 15th September 2014 and comprised the excavation of 18 No. infiltration test pits to depths ranging from 1.25m to 4.00m bgl targeting the most permeable strata present in each case.'</p> |
| 15. | Response to Comments for Consultees | September 2020, Issue B | <p>Appendix 2: Flood Risk Assessment revised by Brookbanks - The area of Basin A shown on drawing number 10309DR-02 rev A (Appendix A in the revised FRA) is 5920 m². The input in the MicroDrainage calculations provided in Appendix B of the revised FRA uses an area of 5650m².</p> |