

MEMORANDUM

From:	Brigitte Crafer Landscape Architect		
Service	WBC Landscape and Trees	App No:	250517
Address:	Land Off Basingstoke Road, To the south and west of Spencers W.		
Proposal:	Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), GP Surgery (Use Class E(e), sports pitch and changing facility, public open space, SANG provision and associated infrastructure.		
Type of Development:	Major All other developments		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Comments On Proposal

Notwithstanding that the location of the proposed development is contrary to policy CP11 of the Core Strategy as it is outside the settlement boundary of Wokingham in the countryside and not an allocated housing site, I provide the following comments on the technical information provided with the application.

1. Arboricultural Report

An Arboricultural Impact Assessment (Incorporating tree protection measures) is submitted by the Environmental Design Partnership (EDP) .Ref. edp8458_r002c February 2025.

The report sets out the nature and extent of the tree losses and provides mitigation and protection measures to ensure the viable long term retention of retained trees in the context of the development proposals.

The AIA has been prepared using EDP's Arboricultural Baseline Note (edp8458_r001) which includes the tree survey information and tree constraints plan. I have not seen this document which presumably contains the detailed information relating to the trees including their heights, dbh, species and quality. As the information has not been provided I am unable to fully assess the impact of the development on the existing trees.

Its not clear how many trees there are across the site but 4 have been identified as 'U' quality and include T11 (Unknown species), T14 English Oak, T92 Ash, and T95 Oak.

In addition to these trees 10 trees have been identified as being impacted by the development proposals and include 9No. category 'C' and 1 category 'U'. The species include; Hawthorn hedges (H20, H5 and H6) , a Hawthorn & Bramble hedge (H13, H78) , T14 Oak 'U, Hawthorn, Bramble and Blackthorn hedge (H41, H91). ,G42 (group of Oak), Mixed broadleaf/Leyland cypress hedge with Hawthorn, Elm,

The Tree Retention and Removal Plan – edp 8458_d002b is divided into 8 sheets. It shows many of the trees in groups and aside from the features removed it is not possible to see what species are included across the site.

There is a breakdown table showing the number of 'A', 'B' and 'C' category trees being retained which includes; 10 No. 'A', 22 No. 'B', 55 No. 'C' and 4 No. 'U' 3 of which will be kept as ecology features.

As the Framework Plan is still conceptual, and there is no detail its is difficult to know how many of the retained trees will be kept through design development. The AIA states that any retained trees affected by the development at detailed design stage will be sensitively worked around to minimise any adverse effects such as ground protection, no dig technologies, hand digging and access facilitation pruning.

Existing trees identified for retention on the Tree Retention and Protection Plan (EDP1) will continue to be managed and requires aboricultural review of any future emerging detailed design and implementation of tree protection barriers and other mitigation safeguards.

Without the full tree survey and schedule the tree information is not in accordance with Policies CC03d and Policy TB21 of the Local Plan which requires the retention and protection of trees, hedges and other vegetation. It will be difficult to understand the choices of future tree species without knowing which species are represented on site currently – as such the proposal do not meet with Policy TB21 which requires applicants demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment including Landscape quality, strategy and sensitivity, and key issues. Proposals will retain or enhance the condition, character and features that contribute to the landscape.

The AIA says in paragraph 3.4 that in line with the RAVEN method (recognition of Ancient, Veteran and Notable trees known as Raven 2) that no Veteran trees were identified during the site survey although 1 Notable tree T30 with some features of veteranisation is noted. The 'Development Framework Plan' Rev. V has retained

T30. As we do not have the tree survey information we cannot check the allocated root protection area provided.

There are very many Veteran and Notable trees identified by both the Wokingham District Veteran Tree Association (WDTVA), which are also included on the Woodland Trust Ancient Tree Inventory (ATI) of which there are 35 in total. I identify T30 as ATI reference 163959.

RAVEN2 is not a recognised way of assessing Ancient and Veteran trees. The starting point is generally the Government/ NE PPG Government Standing Advice on Ancient and Veteran Trees which includes Buffer Zones see below;

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.

A buffer zone around an ancient or veteran tree should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter.

Where possible, a buffer zone should:

- *contribute to wider ecological networks*
- *be part of the green infrastructure of the area*

It should consist of semi-natural habitats such as: woodland, a mix of scrub, grassland, heathland, and wetland planting

You should plant buffer zones with local and appropriate native species.

You should consider if access is appropriate and can allow access to buffer zones if the habitat is not harmed by trampling.

You should avoid including gardens in buffer zones.

You should avoid sustainable drainage schemes unless:

- *they respect root protection areas*
- *any change to the water table does not adversely affect ancient woodland or ancient and veteran trees*

In addition, the NPPF Dec. '24 states in paragraph 193c;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists;

The trees identified on the ATI are broadly located in the site along the NE boundary of field 5, the W and N boundary of fields 3 and 4 and several along the N boundary of Field 1.

There is a section on arboriculture in the DAS where it breaks down the number of trees and hedgerows across the site – which is not included in the AIA.

2. Landscape Assessment

An Environmental Statement by Marrons dated March 2025 has been submitted with the application as required by Local Plan Policy TB21. This document includes 7 sections to address the impact of development. Sections 3,4 and 5 relate to landscape, and section 5 includes the Landscape and Visual Assessment which considers the impacts of the proposed development in relation to its possible effects on landscape character and visual impact.

A Landscape and Visual Strategy see Fig. 5.8 P23-2449_EN_0007_A_0001 is submitted consists of a concept plan illustrating the approach and contains 6 target notes and has been imbedded as part of the scheme proposals which will help mitigate the impacts and effects of the proposed development within the wider landscape. The Target Notes/ principles are summarised below;

1. *Retain and enhance existing green infrastructure network as far as possible to ensure the proposed development recognises the landscape characteristics of the site and is ultimately assimilated within it, rather than imposed upon it*
2. *The internal boundary hedgerow (subsequently enhanced) presents a clear and logical limit to development; setting development parcels north of this maintains an edge that is consistent with the existing settlement pattern, and places a clear limit to the edge of the settlement to prevent encroachment*
3. *Include a greater proportion of green infrastructure and open space in the southernmost parts of the site, reflecting the smaller scale pattern in this part of the landscape and facilitating a greater sense of openness to retain views from Basingstoke Road across the valley of the River Lodden.(NB. landscaping is principally in the norther / mid area of the site.*
4. *Inclusion of SANGS provision around the site, forming a permanent and extensive landscape buffer to the settlement which will incorporate high quality landscape and ecological proposals; this area will provide new opportunities for recreational access in this part of the landscape, not previously available.*
5. *A network of green infrastructure and open space is incorporated into the layout, particularly providing key linkages, core spaces and presenting landscape buffers to the extents of the site, so as to ensure integration with the adjacent landscape context*
6. *Substantial areas of green infrastructure and open space across the site will facilitate an approach to create a diverse range of open spaces, functions and habitats.*

The landscape strategy consists of mitigation and enhancement measures. Mitigation includes the siting of built form within the site against the existing settlement edge and minimising the removal of the existing boundary vegetation and planting. Enhancement measures associated with the proposed development include a new SANG on the eastern side of the site, new open spaces, and additional enhancement planting with opportunities to increase biodiversity across the site with SuDS. Public open spaces provide different recreational opportunities

with internal landscaped routes to link into areas of residential, local centre and the commercial area, multi functional open spaces associated with the local centre, school and sports pavilion. Landscaped areas around attenuation basins, orchard, lots of new tree planting.

The findings of the LVIA are summarised in the report's conclusion and briefly discussed below;

Overall, I don't disagree with the methodology but I disagree with the findings in Table 5.15 of the LVIA regarding the sensitivity of the site to development as being **Low-Medium**.

I assess the site as having medium/high landscape value due to its function in separating the settlements of Spencer Wood and Swallowfield, and parts of the site being assessed as being Valued Landscape. The site has a medium/high susceptibility to development – being an open level site the inclusion of housing would be permanent and very visible in the view despite mitigation measures, therefore the sensitivity of the site to change is medium-high

The LVIA in considering the landscape effects from the proposed development at a site level, which takes into account existing landscape context and features within the site and site characteristics; at the *construction* phase, based on **low-medium sensitivity** and a **high magnitude of impact** results in **moderate to major adverse effect** on the site. At *year 1* changes to the character of the local landscape would be **moderate to major adverse effect**. By *year 15* the significance of effect would reduce to **moderate adverse**

The landscape effects of construction on LCA J3 Spencers Wood Settled and Farmed Clay and A2 Loddon River Valley based on **medium sensitivity** and a **negligible to low magnitude of impact**, the significance of effect is **negligible to minor**. LVIA states that construction will impact on only a discreet part of the wider LCAs and several impacts such as the perception of movement and disturbance will not be perceptible from the wider landscape.

Predicted changes to the landscape resource at completion Year 1 will consist of built form as a permanent component in the landscape. At year 1 the **magnitude of impact** is assessed as **medium** on the A2 and J3 LCAs with a moderate adverse effect. By year 15 the reducing visibility of built form results in a **magnitude of change** of **negligible to low** resulting in **negligible to minor effect**.

Effects on Visual Amenity

There would be temporary local visual effects on the character and components of the site but these are thought to be specific changes to the local view in close proximity to the site. Longer distance views of construction are thought to be more limited and partially screened. The physical impacts are considered to be long term and not reversible, but limited to the site extents representing changes to the landscape character following short term construction phase.

10 Viewpoints have been identified in the ZTI and receptors identified as occupiers, road users and walkers/pedestrians. Development is located to the whole northern boundary and there is further development that spreads west to east across the centre of the site and to the southern part residential and commercial development occupies the whole of this space save for a small element of landscaping. The east and a section in the centre that extends from west to east with linking area on the east side is landscaped and includes a SANG – although the size of the SANG does not have the area capacity to ensure that the 2.3km path does not create loops. In addition the amount of landscaping proposed will do little to screen the development in the view, and the key open views across the site from Basingstoke Road will be lost.

The report assesses the following;

Visibility from the few PRoW are likely to be limited due to intervening topography where the proposed development is visible in restricted sections of such routes the effects would be no greater than **negligible**.

Residential occupiers along the southern edge of Spencers Wood and along Basingstoke Road would have close clear views of development. Where there is strong vegetation to the site boundary views will be restricted. Views would change from edge of settlement open countryside to high quality residential development with POS the effect on the views will be **moderate to major adverse**

There is thought to be some visibility of the development from the south Sheepbridge Court Farm and Sheep Bridge although the views are restricted by intervening vegetation. There may be views from Swallowfield Park in winter – in both instances the effect, and from the northern edge of Swallowfield village is not thought to be greater than **moderate adverse**.

There will be clearly visible short distance views for road users along Basingstoke Road (VP1) Effects on road users including cyclists would be **major (?) adverse** reducing to **moderate adverse** over time when planting matures to **minor – moderate** adverse.

Some limited visibility from sections of Hyde End Road to the north of the site. Effects would be at worst **negligible adverse**. Glimpsed views may be possible from the edges of Swallowfield and Riseley.

Summary of LVIA findings

Noting the LVIA effects of mitigation – judging from the photo viewpoints and the comparing to the landscape mitigation it is hard to see how the amount of planting will help to both screen development and create place to the extent that the report describes but the plans do not. The landscape proposals do not include areas of woodland where it may have contributed – as per the guidelines within the J3 LCA;

Conserve and manage hedgerows with standard oaks as important wildlife habitats and landscape features, as well as the links they provide across the landscape and between areas of woodland.

Conserve and enhance the integration of urban edges through wooded boundaries, hedgerows and large-species trees to provide visual screening and a positive interface between the built up and rural areas.

DAS Part 4- Potential Landscape and Visual Assessment para. 4.8 states:

Overall, the LVIA finds that the proposed development would result in limited effects on landscape character and visual amenity, restricted to the site and its immediate environs. – BC - Clearly this does not take into account the fact that the proposals are located in countryside and the development will be replacing a significant area of that with built form and will be clear and permanently visible in the view

The proposed development would be seen in the context of the existing settlement edge of Spencers Wood, with existing development to the north, west and south.

BC-The development will be seen in the context of the countryside – the proposed development is strung out along Basingstoke Road to the south over roughly 850m of open rural land that contributes to the separation between the settlements of Spencers Wood and Swallowfield and extends into the Ridge and Rivers Valued Landscape.

The proposed development would not result in the expansion of Spencers Wood into the base of the Loddon valley, or the convergence of settlements.

BC-The development results in the expansion of Spencers Wood to the south and east and the site contributes to the convergence of the settlements being wholly in countryside.

4.9 The LVIA considers a range of landscape and visual receptors and impacts have been identified for both landscape character and for visual receptors. This is part of an iterative process whereby potential impacts have informed the design of the proposed development and the associated landscape strategy. Mitigation has therefore been made integral to the design of the proposals, including limiting the development envelope to the northern and western parts of the site

BC - The findings of the LVIA appear to be biased towards development and fail to take account of the location of the proposed development in both the Valued Landscape, and the countryside and is therefore contrary to *NPPF Chapter 15 180a) and b) as the proposals fail to protect valued landscapes, or recognising the intrinsic character and beauty of the countryside and the wider benefits of eco system services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland..*

The design proposals extend urban development significantly to the south of the existing settlement edge and along Basingstoke Road for nearly a kilometre and places commercial development on arguably the most sensitive southern part of the site which is in the Ridge and Rivers VL.

The landscape proposals locate a SANG in the eastern part of the site on a long and narrow space that is not spacious enough to create a natural and interesting route around the SANG to the minimum distance of 2.3km. The type of planting proposed in small groups of tree, single trees and hedges will not screen the development in the view and will be clearly seen by receptors. Despite key views across the site being identified, retained and enhanced the extended open outlook across the landscape to the east and south east will be lost.

3. Design and Access Statement (DAS)

A landscape led approach is advocated in the DAS with considerable discussion given to placemaking within the landscape, landscape provision and how people move through the site. The existing trees and hedgerows are shown to be incorporated into large areas of different types of public open spaces and new green infrastructure/green routes linking to the existing settlement, including SANG which aims to settle the scheme into the wider landscape character.

Page 102 of the DAS onwards relating to Public Space and Green Infrastructure is very thorough looking at a hierarchy of routes through the site via the landscape provision, and various types of open space including SANG, multifunctional open space and kick about, sports pitch and connecting greenways.

The DAS provides an overarching strategy as to how the various elements of the site might be treated. Included are several street types including Avenue, Residential street, Village street, Shared Surface mews, Private Lane and Industrial Road. Sections on parking types includes parking courts, character and types of dwellings, and character areas within the residential parts of the site including The Avenue, Village Streets, Green Edge, Village Green, Village Gateway. Housing is arranged in perimeter blocks that are outward facing and overlooking the landscape setting with hedgerow and tree planting to frontages.

4. Shinfield Parish Neighbourhood Plan – 2017

Throughout the consultation on development within the parish, there has always been a strong support amongst residents to retain the boundaries between, and the identities of, the separate villages.

It is important that new development respects the local landscape quality, ensuring that natural and historic views and vistas are maintained wherever possible.

Policy 6 - concerns trees, hedgerows and woodland, and advocates a hedgerow buffer zone of 15m from the centre line of a hedge on each side in order to allow a minimum 2-4m wide hedgerow plus 5m wide rough grassland habitat strip and adequate access for maintenance. Ancient trees and woodlands... and ponds that are suitable for retention must be retained.

5. Layout

The majority of these proposals for enhancement can be carried out. This is greenfield site and there are few physical constraints / need for demolition of existing buildings, although clearly there will be levelling / stripping of soil.

However, the plans are drawn at a large scale and are illustrative concept drawings showing various dashed and dotted lines, array of coloured graphics showing the different routes and coloured blocks that represent development parcels. The drawings are no more detailed than the pre-application drawings. Despite the Development Framework Plan being scaled there is no means of understanding the layout / measured detail which means cross referring to the DAS which is aspirational and it not clear that there is space enough for the design of the different streets.

The means of access is not outline – but even these are shown conceptually on the Development Framework Plan and the Landscape Masterplan. The main southern access still shows a convoluted route through the development parcels. There is no sense of the views of the 2 access points, how they will create a sense of place between the site and Basingstoke Road and how does the route through the site become embedded in the scheme, and fit in the existing street scene along Basingstoke Road?

Access to the north of the site is close to existing development where part of the local centre is proposed but there is no sense of arrival or departure. Views to the south of the site and the countryside are largely blocked by development parcels. The character of the little open spaces and play areas along the northern boundary look marginalised in some spaces and there is not a sufficient separation in what looks like densely developed blocks of housing next to existing or a sense of connection between existing and proposed dwellings without affecting the presence of retained features such as groups of trees along the northern boundary.

It is difficult to tell from the coloured blocks of residential dwellings how many houses will be located into each block and the type of route they face onto, is there sufficient space for all the requirements for housing, parking, front gardens, verges, rain gardens etc. and access? How does the landscape masterplan ensure that the landscape character of the spaces in between permeate through the blocks and create a successful transition into the existing settlement boundary?

SUMMARY

The site is wholly in countryside to the south and east of the modest development location of Spencers Wood. The site is outside of the South of M4 Strategic Development Location.

The proposal is for a large new housing estate which is outside of development limits which extends the settlement boundary significantly into the countryside.

The proposals are contrary to NPPF 180a, b. and local plan policies CC02, CC03, TB21 of the Local Plan I am unable to support them.

Development proposals affecting Valued Landscapes will only be supported where they protect, and where appropriate, integrate with and/or enhance the special features, characteristics and qualities of the landscape, unless the benefits of the development in that location clearly outweigh the harm.

Conditions & Reasons (if required)			
Date:	10.4.25	Signed:	B. Crafer