PLANNING REF : 262220
PROPERTY ADDRESS : Blagrove Lane
:
: RG414AY
SUBMITTED BY : Mr Clement Maurice
DATE SUBMITTED : 24/11/2026

COMMENTS:
1. SCOPE OF THIS OBJECTION
I object to this application. I accept that outline permission was granted on appeal on 29 May 2025, and that the principle of up to 350 dwellings and the approved means of access are not open to challenge here. This objection therefore deals only with the matters now before the Council: the reserved matters of appearance, landscaping, layout and scale, and the information put forward to discharge the outline
conditions.

The Inspector allowed the appeal after finding moderateharm to landscape character, significant harm from the loss of green infrastructure and significant harm from perceived coalescence. These harms were judged acceptable on the basis of specific assurances: that the access had been designed to minimise tree loss, that the trees lost would be of lower quality, that no veteran tree would be lost, and that the ancient woodland would not deteriorate. The applicant's Planning Statement (paragraph 7.5.1) claims that at outline stage "no significant adverse effects were identified". That is not what the Inspector found. On the applicant's own documents, this submission does not keep to the assurances on which the appeal was allowed.

Summary of grounds:
1. Tree loss goes beyond what the Inspector assessed (Conditions 2, 7, 25 and 35; CS CP3; MDD CC03 and TB21).
2. Veteran trees and ancient woodland buffers do not follow the Natural England and Forestry Commission Standing Advice.
3. The spine road through Bottle Copse Local Wildlife Site has not been assessed for its effect on the woodland's water supply (Conditions 4(f), 7 and 22).
4. The groundwater evidence is incomplete, so Condition 4(a) cannot be discharged.
5. The applicant admits that up-to-date ecological surveys will not be complete until early 2027. Bat protection relies on finding roosts during felling. The LEMP does not mention badgers, and no lighting strategy has been submitted (Conditions 22, 23 and 30; Habitats Regulations 2017).
6. Biodiversity net gain is unproven and may rely on off-site measures (Condition 6(k); CS CP7; MDD TB23).
7. Compliance with the parameter plans has not been demonstrated, and three-storey blocks are proposed at the rural edge (Conditions 2, 7 and 24).

2. TREE LOSS GOES BEYOND WHAT WAS ASSESSED AT APPEAL
Table 1 of the Arboricultural Method Statement (Aspect, 12876_AMS.001 Rev B) lists 117 individual trees for removal: 27 Category B, 71
Category C and 19 Category U. Removal also covers the understorey of the Category A woodland W1 (protected by woodland TPO), and allor part of eight tree groups and five hedgerows (H1, H5, H6, H8 and H9). Thirty-eight of the 117 trees are English oaks.

Paragraph 2.2.2 of the AMS confirms that oaks T7, T8 and T9, holly T12 and oak T336 were shown as retained at outline stage and arenow to be felled. T7 (trunk diameter 1,000 mm, with woodpecker holes throughout) and T336 (1,050 mm) are mature Category B oaks in the Barkham Road frontage of the woodland. The applicant says these losses were "already assumed to be approved in detail" because they result from the access design. I disagree. At outline stage these trees were shown as retained. The Inspector's finding of an acceptable impact on Bottle Copse Local Wildlife Site rested on the access being designed to minimise tree loss, with any trees lost being of lower quality. Felling further Category B oaks that the outline assessment retained is new harm that the Inspector did not weigh. Condition 7 also
requires the Design Code to build mitigation into the design and planting of the access road through the TPO woodland.

Oak T289 is to be removed because it is "no longer considered appropriate for retention within close proximity to residential units" (AMS 2.2.2). Landscaping and layout are the matters being decided now. The layout should be designed around retained trees. Trees should not be removed to suit plot positions.

AMS paragraph 2.3.3 also recommends removing dead branches from all retained non-veteran trees. Standing deadwood is important habitat for bats, invertebrates and woodpeckers. Removal should be limited to branches that pose a real risk over paths, roads or gardens.

I ask the Council to require: a revised junction, footpath and excavation design that retains T7, T8, T9 and T336, or else a full justification foreach loss assessed against the TPO; plot changes so that T289 is retained; and a deadwood condition limited to safety works.

3. VETERAN TREES AND ANCIENT WOODLAND
AMS paragraph 1.5.2 refers to "differences in professional opinion regarding the assignment of veteran status". The Inspector relied on the finding that no veteran tree would be lost. Veteran status should not be settled by the applicant's consultant. I ask that the Council's tree officer publish a schedule of every tree recorded as veteran or notable at outline stage, showing its current classification, whether it is retained, and its buffer.

The Tree Protection Plan marks three trees as "dead tree previously identified as veteran". The applicant should explain why veteran trees have died since the outline survey. Dead veterans remain valuable habitat and should be kept as standing monoliths or left as fallen deadwood, not cleared.

The AMS applies a buffer of 15 times trunk diameter to veteran trees. The Natural England and Forestry Commission Standing Advice requires the larger of 15 times the diameter or 5 metres beyond the edge of the canopy. The Planning Statement (paragraph 2.1.3) confirms that ancient woodland lies within the site, yet its buffer is drawn at the 15-metre minimum. The Standing Advice says buffers should be larger where impacts extend further. That applies here: 249 new homes, SANG visitors, dogs, domestic cats and new street lighting will all sit next to the woodland. Buffers should be widened, kept as semi-natural habitat, and kept free of gardens,

paths and drainage features.

4. THE SPINE ROAD THROUGH BOTTLE COPSE LOCAL WILDLIFE SITE
AMS paragraph 2.6.1 states that the spine road "bisects the woodland" and that the toe of an earth embankment will sit within the root
protection areas of 19 retained trees (T43, T49, T51, T52, T55, T58, T66, T86, T99, T102, T103, T127, T128, T137, T146, T162, T164, T165 and T178). The AMS says no mitigation is needed beyond fencing and supervised grading. Placing fill over roots reduces soil aeration and water supply, and the effects often show only years later. A no-dig or retained-edge construction keeping all fill outside the root protection areas should be required.

In addition, new footpaths and cycleways are proposed withinthe root protection areas of 44 retained trees and one tree group (AMS 2.7.1), and excavation is proposed within the root areas of 22 trees and
groups, including the woodland W1 (AMS 2.5.2). The route of the SANG path through the retained woodland is notfixed. It is left "to be agreed onsite" after approval (AMS 2.8.2). Landscaping is a reserved matter, and the Council cannot properly approve a path through protected woodland whose route has not been decided.

Condition 4(f) requires the drainage scheme to maintain "the quality, quantity and constancy of the hydrology of the existing LWS". The applicant's own BNG note (paragraph 5), Planning Statement (paragraph 7.7.3) and LEMP (paragraph 4.1) all record wet woodland within Bottle Copse. The Flood RiskAssessment (SIM, P25-1549 Issue 6) mentions the Local Wildlife Site only where it quotes the condition. It does not assess how the road embankment, lined basins, filter drains and
changes to ditch flows will affect the water supply to the wet woodland. Condition 4 cannot be discharged without that assessment.

5. GROUNDWATER: CONDITION 4(a) CANNOT BE DISCHARGED
Condition 4(a) requires "evidence of the level of the seasonally high groundwater table". The applicant's own Winter Groundwater Monitoring Report (Soils Limited, 22377/WGWMR, April 2026) shows that:

- Wells were installed on 24-25 March 2026, and only three readings were taken, the last on 7 April 2026.
- By 7 April, water stood between 0.40 m and 1.03 m below ground, within 0.9 m of the surfacein seven of the eight wells, and was still rising in four of them (WS1 rose from 3.00 m to 0.73 m; WSA from 2.50 m to 0.40 m).
- The report states that equilibrium can be established only through a series of observations. It also states that monitoring continues until February 2027, with an addendum due in February or March 2027.

The 2022 winter monitoring cited in the FRA recorded water as shallow as 0.22 m below ground. Yet the FRA presents only the May and June 2026 readings (0.79-1.95 m) as its "more recent" monitoring, and does not report the March-April 2026 winter results. Soakage tests failed. The basins are to be lined "as a result of the elevated groundwater levels" (FRA 6.7). I could find

no assessment in the FRA of liner uplift, of basin levels against groundwater, or of where displaced groundwater will go.

Finished levels are set "generally at or above existing ground levels" (FRA 6.9.1), and the basin edges are to be raised above existing ground (AMS 2.6.2). Existing homes on lower ground on Evendons Lane, Roberts Grove and Blagrove Lane could be affected. The levels plan required by Condition 24 has not been submitted. I ask the Council not to discharge Condition 4 until the full year of monitoring has been reported and the drainage design has been checked against it.

6. ECOLOGY: OUT-OF-DATE SURVEYS, REACTIVE BAT PROTECTION, BADGERS OMITTED, NO LIGHTING STRATEGY

The applicant's Planning Statement (paragraph 7.7.1) states that "up-to-date ecological surveys ... are being currently being undertaken [sic] and will be completed by early 2027". The Landscape and Ecology Management Plan (FPCR Ecology and Aspect, 9081.LEMP.002, paragraph 4.2) still cites "the 2020 surveys" for its conclusions on protected species. The applicant therefore asks the Council to fix the layout, landscaping and woodland road alignment on survey data that the applicant itself accepts needs updating, before the surveys that should inform them are complete. CIEEM guidance treats ecological data more than three yearsold as unlikely to be valid. Condition 23 requires up-to-date surveys, but once the layout is approved their findings can no longer shape it. The reserved matters should not be determined, and Condition 22 should not be discharged, until the 2027 surveyshave been submitted and assessed.

Bats. The LEMP describes the site as supporting "an assemblage of common and widespread bat species" (paragraph 4.2). That single sentence is the whole bat baseline: there is no species list and no roost locations. Local recorders have reported serotine and Nathusius' pipistrelle, which are not common species, and representations at outline stage reported confirmed roosts on the site. Protection during felling is reactive. LEMP paragraph 5.5 says tree works will have onsideration" for roosting bats and will stop only "if any bat is identified roosting within the tree". Under that approach, roosts would be discovered during felling. The Arboricultural Method Statement, which schedules the felling of 117 trees and the removal of deadwood from retained trees, does not mention bats at all, and its seasonal timing protects nesting birds only. Several trees to be felled have recognised roost features or could not be inspected: oak T7 has woodpecker holes throughout and a large tear-out wound, and T7, T8, T9 and T336 are recorded as ivy-clad and unable to be thoroughly inspected. The proposed mitigation of 20 bat boxes (LEMP paragraph 6.4) does not make up for the loss of mature trees with roost potential. Before the layoutis approved, the applicant should provide preliminary roost assessments and, where needed, emergence surveys for every tree to be felled or pruned, together with a pre-felling protocol under ecological supervision. Bats are a European protected species, and the Council must have regard to the Conservation of Habitats and Species Regulations 2017 in making this decision.

Badgers. The LEMP, which Condition 22 requires to manage the site's ecology, does not mention badgers at all. Representations at outline stage reported badger setts across the site, including in Bottle Copse, where the spine road and SANG paths are proposed. The Planning Statement (paragraph 7.4.4) describes perimeter fencing to allow off-lead dog exercise across the SANG, which includes the woodland. Off-lead dogs in woodland containing badger setts is a foreseeable conflict. A LEMP that leaves out a protected species known on the site is not fit to discharge Condition 22.

The SANG Landscape Management and Maintenance Plan (Aspect, 81.SLMP.002) permits phased thinning, coppicing, pollarding, felling of unsafe trees, removal of dangerous limbs and removal of sycamore within the Local Wildlife Site and next to ancient woodland. Its only seasonal safeguard is for the bird breeding season. It contains no bat checks before tree work and no protection for badger setts.

Lighting. Neither management plan addresses lighting, and the biodiversity lighting strategy (Condition 30) is deferred until before first occupation. The spine road through the woodland is a likely bat flight corridor, and its footway must also be safe for pedestrians after dark. Road layout, lighting, bat impact and pedestrian safety depend on each other, so they must be settled together. The lighting strategy for the woodland section should be submitted and assessed with this application.

7. BIODIVERSITY NET GAIN

The applicant's BNG Supporting Note (Savills, 1 October 2026) relies on a Technical Note dated February 2024. That calculation showed a broad-habitat gain of only +0.28 units (0.14%), to which the Inspector gave neutral weight. Condition 6(k) requires each phase to show,
through a detailed calculation, that it delivers no less than the headline results. Phase 1 now removes trees that the 2024 calculation assumed would be retained (T7, T8, T9, T336 and T289), and the June-July 2026 tree survey records larger trees than the outline survey. With a 0.14% margin, these changes may turn the broad-habitat result into a net loss. The Planning Statement (paragraph 7.7.4)
states that gains will come from new habitats "and if required by offsite measures", which suggests the applicant is not confident of achieving the gain on site. A recalculated metric using the updated baseline should be required and published before determination, with any reliance on off-site measures identified and secured.

8. LAYOUT, SCALE AND APPEARANCE

Condition 2 requires reserved matters to be "substantially in accordance" with the parameter plans, including the Green Infrastructure Parameter Plan PP03 Rev K and the Building Heights Plan PP06 Rev C. The AMS (paragraph 1.5.3) describes the layout as in "broad accordance" and says that development parameters have been adjusted. The applicant should provide a plan showing every departure from the parameter plans so that compliance can be checked.

Four apartment blocks are proposed with second-floor plans, meaning three storeys. These should be checked against PP06 Rev C. They

should also be judged for their effect on the rural edge, wherethe Inspector found lasting visual harm and significant coalescence harm. The reserved matters should reduce those harms through lower building
heights at the edges, deeper landscape buffers and retention of the existing hedgerows proposed for removal.

9. OTHER MATTERS
- Construction traffic: the CEMP (Condition 16) should require all construction traffic to use the Barkham Road access only. Blagrove Lane, Evendons Lane, Doles Lane and Edneys Hill are narrow lanes and should not be used.
- Accuracy: the FRA states that outline permission was granted in September 2024; in fact the Council refused the application and it was allowed on appeal on 29 May 2025. The application form gives the decision date as 29/05/2026. The AMS lists oak T336 both for removal (Table 1) and among retained trees requiring supervised excavation (paragraph 2.5.2); its status should be clarified. Conditions are being discharged against these documents, so they should be corrected.
- Related application: the applicant asks for this application to be determined together with RMA2 (262221, 101 dwellings east of Blagrove Lane). The LEMP covers both phases. Where relevant, this objection applies equally to that application.

10. CONCLUSION AND REQUESTS
This submission does not meet the conditions the Inspector attached to the permission, and it moves away from the assurances on which the appeal was allowed. By the applicant's own account, the ecological
surveys needed to inform it will not be complete until early 2027. I ask the Council to refuse the reserved matters, or not to determine them, and not to discharge Conditions 4, 6, 7 and 22, until the applicant has:
1. Completed and submitted the up-to-date ecological surveys, including badger, reptile and bat surveys, with preliminary roost assessments and, where needed, emergence surveys for every tree to be felled or pruned.
2. Redesigned the access, footpaths and plots to retain oaks T7, T8, T9, T289 and T336, or justified each loss against the TPO.
3. Provided an independently verified veteran and notable tree schedule, with Standing Advice buffers (the larger of 15 x diameter or 5 m beyond the canopy) and a wider ancient woodland buffer. 4. Fixed the SANG woodland path route and replaced the spine-road embankment within root protection areas with a no-dig or retained-edge solution.
5. Revised the LEMP and the SANG management plan to set out the bat species and roosts found, require pre-felling bat inspections in place of stop-if-found working, protect badger setts, and keep dogson leads within the woodland.
6. Assessed the hydrology of the Local Wildlife Site as Condition 4(f) requires.
7. Completed the full year of groundwater monitoring and re-tested the drainage design, liner uplift and finished levels against it, with the Condition 24 levels plan.

8. Submitted a lighting strategy for the woodland section.
9. Submitted a recalculated, phase-specific biodiversity metric using the 2026 baseline, identifying any reliance on off-site measures. 10. Provided a parameter-plan compliance drawing, and

reduced building heights at the rural edge.

Please notify me of the committee date if the application is to be determined by the Planning Committee.