

MEMORANDUM

From:	Brigitte Crafer Landscape Architect		
Service	WBC Landscape and Trees	App No:	241567
Address:	Land To The East Of Longwater Road, Finchampstead, RG40 3TS.		
Proposal:	Full application for the proposed erection of 40no. dwellings (Use Class C3), together with associated outdoor space and landscaping, drainage infrastructure, hard and soft landscaping, parking, access, and associated works.		
Type of Development:	Major Dwellings (10+)		
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

The site is located in the countryside and Policy CP11 applies. The site has not been identified for development in the Local Plan or in the Local Plan update. The site is included in Archaeological site ref. 51, and within the Blackwater Valley Berkshire Biodiversity Opportunity Area.

The site is surrounded on 3 sides by woodland and hedgerow, river flood plain and settlement on 1 side. All the trees on the site are protected by TPO 1596/2017. A PROW Finc 12 goes east west across the northern part of the site, accessed from Longwater Road egressed via private drive.

The site is located south of the settlement edge which is currently formed by Wood Moor housing area to the north of site which is bound by Cricket Hill to the east and Longwater Road to the west. The existing area of housing represents a significant extension to the south of the village envelope, notably beyond the rest of the southern settlement edge e.g Burnmoor Meadow and Longwater Lane to the west. The development would highlight a further expansion beyond the settlement edge into the countryside well beyond the village hub.

The site acts as a physical and landscape buffer between the edge of the settlement and the flood zone of the river Blackwater and the Moor Green Country Park. The site contributes to a sense of separation between the settlements of Finchampstead and Eversley Cross to the south.

Landscape Character and Valued Landscape

The site is identified in Wokingham Borough's 'Landscape Character Assessment' WBLCA (2019) within area B2 'Blackwater River Valley with Open Water', this is a landscape of moderate quality and sensitivity overall, with a modest capacity for change. Within this overall classification there may be areas of higher or lower quality and sensitivity. The site is also within the 'Blackwater River Valley Valued Landscape' (see Landscape Topic Paper WBC 2020) . Indeed, the WBLCA identifies 'Valued Landscape Attributes' of LCA B2 the majority of which relate directly to the site;

- ***Rural riverine character of the Blackwater River and restored floodplain*** provide a sense of space.
- ***Ecologically valuable wetland habitats*** including BAP priority habitat eutrophic standing waters, lowland mixed deciduous woodland and floodplain grazing marsh, as well as remnant wet meadow and ancient woodland e.g. at Longwater Lane Meadow and Fleet Copse not affected by mineral extraction, which provide an important environment for flora and fauna.
- ***Restored gravel pit lakes*** which provide important ecological habitats and support a diverse range of birds, as well as opportunities for recreation.
- ***Undeveloped character of the valley***, particularly in the floodplain, which provides a sense of naturalness and remoteness.
- ***Quiet rural lanes bordered by hedgerows*** which provide access to the area and enjoyment of the countryside.
- ***Recreational value of the Moor Green Lake Nature Reserve*** and the public rights of way including the promoted Blackwater Valley and Three Castles Paths which give access to the area and enjoyment of the river valley.
- ***Localised areas of tranquillity and peacefulness, with an experience of dark skies***, particularly around the restored lakes, and away from the B0136.
- ***Views to the wooded backdrop*** of Fleet Copse and Finchampstead Ridges create an enclosed and secluded character, particularly around the Moor Green Lakes

The Landscape Strategy in the WBLCA for LCA B2 is;

*To maintain the landscape character of the Blackwater River Valley with Open Water the following strategy is required: **to conserve and enhance wetland and woodland habitats. The key aspects to be conserved, enhanced and actively managed are the River Blackwater corridor, the wetland habitats associated with the river and former gravel works, the woodland (particularly the ancient woodland) and the perceptual characteristics including the peaceful setting and dark skies.***

*In terms of development, the aim is to **conserve the sparse settlement pattern** and retain the views to the wooded backdrop provided by Fleet Copse and M2: Finchampstead Ridges Forested and Settled Sands.*

The Landscape Guidelines that relate to the site include;

- **Conserve, protect and enhance the scenic quality and naturalistic character of the river corridor and restored gravel pits...** to maximise biodiversity and scenic qualities
- **Manage and enhance the wildlife interest of agricultural fields** by encouraging the creation of uncultivated field margins
- **Reinstate or repair hedgerows with native species of hedgerow trees and shrubs to create a connected landscape pattern**
- **Conserve, enhance and manage wetland habitats, particularly in newly restored areas of former gravel pits, and BAP priority habitats, particularly from development, changes in land use and encroachment by secondary woodland and scrub.** The area is part of the Blackwater Valley BOA. This network of re-created natural habitats, which extend into Bracknell Forest and Hart districts, has been identified as a target for habitat re-creation and restoration and positive management of grassland and wetland habitats. An appropriate wetland management regime is critical.
- **Maintain the prevailing hydrology and water tables to enable anaerobic conditions to preserve archaeological sites** in low lying wetland areas, particularly along river corridors.
- **Seek sympathetic integration of new recreational facilities** e.g. hides, footpaths, and associated car parks into the landscape.
- **Enhance informal recreational enjoyment of the landscape** and consider zoning of activities to ensure ecologically valuable are protected. Ensure appropriate management of informal recreation, particularly in relation to the Rights of Way network.
- **Maintain the sparse linear settlement pattern** of dispersed low density domestic scale small settlement set within large plots and farm buildings through control of new development, avoiding further linear spread of development. Consider opportunities to strengthen and enhance the landscape setting to existing villages through planting.
- **Maintain and enhance the character of the rural lanes, resisting unsympathetic highways improvements, infrastructure and signage**
- **Retain and maintain views to the wooded hills.** Consider the impact of any development on the views to the wooded ridgeline. **Consider the effects of change within the adjacent area on this valley landscape.**
- **Conserve and enhance the perception of tranquillity and remoteness in the landscape, including the experience of dark skies, through the management of development.**

The 'Valuable Landscape Attributes', landscape strategy and landscape guidelines very much focus on the scenic quality and naturalistic character of the remote river corridor and the restored gravel pit lakes with their associated tranquillity and sense of remoteness which is rare in the borough. The gravel pits to the south of the site, will be restored in due course and will become integral to Moor Green Lakes Country Park south of the site – see Policy SAL 6 of LP. In order to achieve these positive outcomes it is essential that development remains sparse in the area, the character of tree lined country lanes are maintain, not adversely affected by increase in traffic volumes, views are maintained, but also **that the buffer** between settlement and the river corridor is retained so that the rare qualities can flourish.

The recently adopted *Finchampstead Neighbourhood Development Plan 2022-2038* Plan includes the following in relation to development;

‘Our objective is to avoid unplanned speculative development with no infrastructure improvements and instead, to deliver development in a structured and planned manner through which the community has made a positive, proactive and meaningful contribution and around which infrastructure can be proactively planned and delivered’.

Arboricultural Impact Assessment (incorporating tree protection measures)
EDP ref. 4070_r013a

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

The arboricultural character of the site is found chiefly to the site boundaries with the eastern boundary containing open grown mature Oak trees on, and off site that still influence the site setting. The southern site boundary is marked by a neglected hedgerow that covers a water filled ditch in which some of the trees are growing and some growing on the bank. The eastern boundary is a native hedgerow with Oaks growing within it. To the northern boundary is a hedge to the back of the dwellings which is mostly ornamental conifers.

There are 5 ‘A’ quality Oak trees, 2 of which are offsite but influence the site character, 20 ‘B’ quality trees, and 6 ‘C’ quality trees and one ‘U’. T2 is likely a Veteran Oak as well as T5 and T8 all displaying the features of veteranisation such as branch shedding, holes, fruiting bodies, and are classified in the Tree Survey Schedule as representing arboricultural, landscape, conservation and cultural qualities (A1, 2 and 3 see BS5837:2012).

Despite tree T2 being an obvious Veteran tree, there is clear encroachment into the outer root protection area (RPA) of the tree from the proposed roadway. The 15m root protection radius has not been applied which is required for Veteran trees – BS5837:2012 caps the RPA at 15m radius for large non-veteran trees. The PPG ‘Government Standing Advice on Veteran Tree is clear and requires;

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.

The diameter of T2 tree is 1280mm x 15 results in a buffer zone of 19.20m (radius).

In BS5837:2012 the radius of the RPA is capped at 15 m (15x15=707m²) for large trees that are not of Veteran status and this has been applied to T2 on the Tree Protection Plan which shows a 15m RPA that extends to 5.8m from the edge of the canopy. The tree is clearly exhibiting Veteran features and should be provided with the correct size of buffer zone of 19.2m from the centre of the tree stem. Bearing in mind the status of the site trees growing in open ground their whole life reaching their size with no constraints, the maximum amount of buffer zone of 19.2m RPA

should be applied in this case, to be devoid of built development – as the PPG states buffer zones should;

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

As it stands the information provided does not comply with NPPF-2023 paragraph 186c which states;

‘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 reasons⁶⁷ and a suitable compensation strategy exists.’

To facilitate the site entrance for Longwater Road 4 No. Oak trees T22-T25 will be lost and a section of H 31 the hedgerow in which the trees are located. These are ‘B’ quality trees as well as being protected. I cannot see why Trees T22 and T23 will be removed – is this to facilitate further engineering work? It is not clear from the plans the reason. Although the trees can be replaced, the fact they are growing in an existing hedgerow will create gaps that in the case of the entrance cannot be mitigated in or close to where they have been growing. In addition, the wide entrance bellmouth 20m+ will introduce an urbanised character to the road, which is a straight section of a rural lane where cars start to gather speed for the short stretch of road between Finchampstead and Eversley Cross. The visibility splays provided in the Transport Report are not clear. In assessing the southern exit from Wood Moor Estate closest to the proposed site entrance, I can only surmise that the visibility is poor to the south and there is a possibility off site as well as on site trees and hedges will be lost.

The southern site boundary has 2 stretches of hedge with trees. The hedges G16, G10, and G14 are growing across the wet ditch that appears to be outside of the site boundary on the Tree Protection Plan. Within the hedges are hedgerow trees, many growing on the bankside, or closer to the water and their roots are waterlogged;

T8 Oak is a mature ‘A’ category surveyed as having arboriculturally, landscape and cultural and conservation qualities (1,2 & 3) – Although no Veteran features are included in the survey, the tree is notable and has been given the A3 classification for a veteran tree. Despite the fact it is growing with its roots waterlogged it is obviously thriving. Trees T11,12 & 13 are all ‘B’ quality Oaks growing on the north side of the wet ditch with waterlogged roots. G10 comprises of native trees such as Willow, Birch, Holly, Hazel, Hawthorn and Bramble, and is a neglected hedge that appears to be growing across the ditch. G14 is a multi-stemmed Birch ‘B’ quality

with waterlogged stems. Trees T15, 17 and 18 are all 'B' quality Oaks growing north of the wet ditch and T18 has high habitat value. The trees are large and provide character as well as biodiversity opportunities. G16 is a mixed native hedge includes; Willow, Holly, Oak, Birch, Bramble, Ivy, Hazel, and is neglected and overgrown covering the wet ditch.

The wet ditch along the southern boundary has clearly not been maintained for a considerable number of years but maintenance will surely be required should the scheme go ahead which may result in an adverse impact on the trees and hedgerows and their associative biodiversity. The ditch may be used as part of the SuDs train to collect more run-off from the built development. As stated in the tree survey the hedges are neglected but with care their condition could be improved. The trees contribute to the diversity across the boundary and contribute to screening to this boundary and have high habitat value and should be retained. It is important that we can understand from the Arboricultural information the impact of the scheme on the boundary tree and hedge features, whose responsibility they really are – where they are growing off site how will they be managed or enhanced and how will this affect the Landscape Strategy ? How will they be affected by the restoration scheme to the south of the site?

It is stated in the 'Arboricultural Impact Assessment that the tree constraints informed the layout of the scheme, but this is clearly not the case or there would be no incursion into the root protection areas of tree T2 a Veteran tree. The tree Survey has provided the 'A' quality trees with the A1, 2 listing that relates to arboricultural and landscape contribution, and A3 cultural and conservation value which points to Veteran trees – see Table 1 of BS5837:2012. However, there has been no provision for the correct amount of protection for these trees as discussed in the PPG Government Standing Advice on Veteran trees which states that Buffer zones that equate to 15 x the diameter of the tree trunk should be implemented or be 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Together with the loss of 'B' quality protected trees to facilitate the entrance, and the potential loss of southern boundary landscape features, the proposals do not comply with Policies CP1, CP3, CC03 and TB21.

Landscape and Visual Appraisal – EDP Ref. 4070_ r012c

The methodology accords with GVLIA 3, the development was not subject to an EIA

The assessment was carried out in March where the trees were mostly not in leaf. The report does not acknowledge the site is in the 'River Blackwater Valued Landscape' see Landscape Topic Paper WBC 2020, but acknowledges the site is 3km away from the 'Finchampstead Village Area of Special Character'.

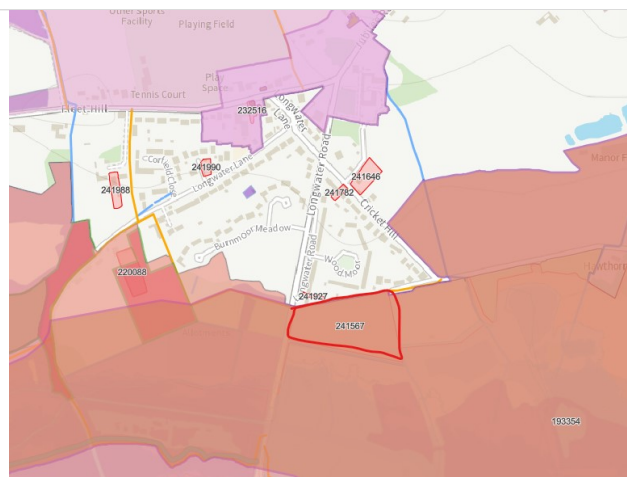


Fig. 1 Shows the Blackwater River Valley Valued Landscape in pink and the Finchampstead Village Area of Special Character in lilac – site outlined in red.

The baseline assessment of the LCA B2 in the WBLCA (2019 and 2004) describes LCA B2 in a good condition, the sensitivity and susceptibility to change is moderate and modest respectively (within the overall landscape).

The LVA carries out a detailed character assessment of the site and its immediate surroundings within the context detailed in Table EDP 6.1 of the LVA which assesses the predicted landscape effects of the proposed development on;

- The site and its immediate context
- The B2 LCA within the site
- The B2 LCA wider character area

Landscape Receptor	Sensitivity	Magnitude of Change at Year 1	Level of Effect at Year 1	Magnitude of Change at Year 15	Level of Effect at Year 15
The Site and its immediate context	Medium	High	Major/- Moderate adverse	Medium to Low	Moderate to Moderate/- Minor adverse
LCA B2: Blackwater River Valley with Open Water – Within the Site	Medium	Low	Moderate/- Minor adverse	Very Low	Minor adverse
LCA B2: Blackwater River Valley with Open Water – Wider character area	High	Very Low	Moderate/- Minor adverse	Very Low	Minor adverse

Fig 2 – shows the division of the landscape assessment and predicted effects

The LVA states that the site has no elevated landscape importance above that of the surrounding area, although I broadly agree with this, I note that within the LVA and the Arboricultural Report, the quality of the 5No. 'A' quality trees (all but 1 have the A3 rating denoting 'Veteran' status) has been ignored, likewise the 'Valued Landscape Attributes' of the LCA, all but one relate directly to the site and its periphery, have also been ignored. The trees within the site **are** protected by TPO

1596/2017. Within the context of the Moor Green Country Park extension, it can be said that the landscape on the site periphery can be seen as having an elevated context in terms of its distinctiveness and recreational elements.

The site also contains a PROW which traverses the site linking it to the wider village. The PROW will be retained within the site, so its relationship to the development is important in terms of its setting which will change, the visual impact from the PROW would be substantial. A key quality of the wider B2 landscape, which is also applicable to the site periphery is the remote and tranquil character associated with the river corridor and the associated wetlands, which will be compromised by a degree from the development and its easy access to the country park extension. In this respect I consider the sensitivity of the site to be Medium/High accounting for the elements described above.

In assessing the descriptions for the 'Magnitude of Change' on the Landscape Receptor, I agree that the development would create a new focus and have a defining influence on the view, with large scale visual and landscape effects that are permanent and irreversible, with visual changes experienced in direct, close ranging views from the PROW and adjacent housing – all of which amount to a Very High Magnitude of Change. However, the impact be a notable loss or alteration of one or more key elements/features rather than total loss due to the retention of most of the trees and hedges, resulting in a High Magnitude of change- and as the proposed development is an extension of the settlement edge from the north, it will relate to that. Overall I assess the Magnitude of Change to be Substantial/Major with Medium/High sensitivity resulting in a Major/Moderate Adverse effect on the landscape character at Year 1, which as the development is irreversible will change little over time with the addition of landscaping or the completion of the country park.

Visual Assessment

Table EDP 6,2 summarises the visual effects from surrounding footpaths, roads and dwellings. The table does not cross reference the viewpoints. My assessment is the key receptors are users of PROW 13 where the effect at year 1 is Major /Adverse. I assess the effect at Year 1 on dwellings of Wood Moor to be Major/Adverse. I assess the users of Longwater Road that connects with PROW 54 will experience a Major/Moderate adverse effect from crossing the entrance to the visual impact of dwellings and the paraphernalia associated with them such as lighting, noise and loss of rural views. Users of Sandhurst Road will likely experience Moderate/Adverse effect at Year 1.

Review of Proposed Layout, Landscape Strategy and Landscape Design Rationale in relation to the Policy TB21, but also CC02, CC03, CP1 and CP3;

Policy TB1 states;

Proposals must demonstrate how they have addressed the requirements of the Council's Landscape Character Assessment including landscape quality, landscape strategy, landscape sensitivity and key issues.

Proposals shall retain or enhance the condition, character and features that contribute to the landscape.

1. The site is within the countryside on the edge of the settlement, and acts as a buffer between Wood Moor and the flood zone of the river. The development would extend the settlement area further to the south and the flood zone, whereas on the west side of Longwater Road a similar site is used as a meadow and visual buffer setting for a linear development at Burnmoor Meadows.

The WDLCA includes a Landscape Strategy for the B2 character area in relation to development; *'to maintain the sparse development pattern'*, which is turn will; *'Maintain and enhance the character of the rural lanes, resisting unsympathetic highways improvements, infrastructure and signage'*.

2. Crucially, the site will be accessed from Longwater Road currently a tree and hedgeline country road where the site is edged with good quality Oak trees some of which will be removed to facilitate the bellmouth entrance of 20m+ onto a straight road at 60mph. The entrance will introduce lighting, hard landscaping, and structures that will facilitate a high rate of car movements as the development is some way from local facilities. The entrance will have an urbanising effect on the character of the country road and visibility splays will ensure that no vegetation is higher than 600mm within them, resulting in views into the site dominated by built form.

Specifically the Landscape Guidelines for WBLCA B2 state;

*Maintain the **sparse linear settlement pattern of dispersed low density domestic scale small settlement** set within large plots and farm buildings through control of new development, **avoiding further linear spread of development**. Consider opportunities to strengthen and enhance the landscape setting to existing villages through planting.*

*The key aspects to be conserved, enhanced and actively managed are the River Blackwater corridor, **the wetland habitats associated with the river and former gravel works**, the woodland (particularly the ancient woodland) and the **perceptual characteristics including the peaceful setting and dark skies**.*

3. The housing layout uses a significant area of the site laid to built form around a loop form with a stem to the east, which represents an incursion into the buffer zone for the Veteran trees (T2 and T5). The building area extends across the site to the south and although the Landscape Strategy identifies areas of POS to the north, east and south, these areas are small, and the southern area includes a seasonally wet attenuation basin.

It is notable that the red line boundary of the country park extends to the southern site boundary and northwards to include land next to Lower Sandhurst Road, extending the park to include small fields and woodland closer to the settlement which meets many of the criteria of the B2 Landscape Guidelines, where the development proposals do not;

4.The PROW that traverses the site is a direct link to the Country Park. A link is proposed within the site but is this really necessary ? By providing more links, especially next to housing would result in additional footfall would directly conflict with ;

Conserve and enhance the perception of tranquillity and remoteness in the landscape, including the experience of dark skies, through the management of development.

Enhance informal recreational enjoyment of the landscape and consider zoning of activities to ensure ecologically valuable are protected. Ensure appropriate management of informal recreation, particularly in relation to the Rights of Way network.

5.A Landscape Strategy is submitted with the proposals, as well as a Landscape Rationale and includes;

- Retention of rough grassland just to the north of the access road for reptiles – will this really be an attractive area for reptiles?
- Trees are proposed to the northern boundary with the rear gardens of Wood Moor but these will overshadow rear gardens.
- Also there are no front garden / front verge tree planting on the northern side of street where there is no overshadowing of dwellings/gardens, and could be used more liberally – in a green verge that could replace the footway on the north side that goes nowhere.
- Footways on the edges of turning heads – are these really necessary its more urbanisation when there is no need.
- The ditch may be used within the SuDs scheme and will probably require a degree of clearance. The relationship of the hedge and ditch to the site needs to be clearly understood in order to work out the most appropriate boundary treatment for the site. The treatment of the 5m riparian zone is not clear.
- In order for the attenuation basin to be an attractive, functional and usable feature it will need to be designed without steeply sloping sides which may require more space.

6.The Design Rational says that the central residential area will be characterised by ornamental and structural planting but this is very minimal and does nothing to integrate the layout into the rural setting or mitigate its urban character.

7.The location of the entrance next to the PROW undermines its rural setting and outlook and the verge between the southern boundary gardens of Wood Moor has not been addressed. The verge will have a completely different character once the road is included.

Summary

The proposed layout of the development fails to integrate / successfully extend the built form of southern edge of Finchampstead village. The design does not relate back to the landscape character and what we would expect to see. The WBLCA B2 talks about new development being sparse to match that of the village and with a linear style layout. The entrance to the site close to the PROW diminishes its experience. The form of the layout is dominated by a large proportion of hard landscape, with unnecessary footpaths.

The proposals do not integrate within the quality of the landscape and its valued landscape attributes, most of which are found to the site periphery, and not recognised in the LVA and not relating back to the Landscape Strategy. Will the site really be multi-functional and which habitats can really be created on the site that have a chance of thriving?

With the design proposed the landscape guidelines cannot be incorporated into the scheme without fundamental changes to the layout. There is no real street hierarchy and some pedestrian links are superfluous to requirements. A softer approach to hard landscape materiality needs to be factored in to suit the character of the space.

The layout is not addressing any public internal spaces and the end of key vistas, and there is no permeability through the site / visual connection to the wider landscape for the majority of the dwellings that face other houses and not the views – especially views to the south. The scheme does not protect and nurture the key aspects of the local character such as the views, the existing features, and the setting to the west. There is an insufficient Veteran tree buffer to the east of the site which needs to be correctly incorporated.

The location of the entrance governs the position of the road and site layout which whilst this is largely within the northern part of the site the proportion of built form to soft is too high.

The proposals would benefit from a review of the layout – is the location of the entrance at the northern end the best location – is there an alternative possibility further to the south that extends diagonally across the site? The layout is spread across the site in 2 blocks that requires more main road, is it possible to reduce the extent of the 'main road' and design the residential blocks with gardens side onto the on site PROW, where most of the dwellings would face a larger POS to the south which would be a larger buffer to the country park?

Conditions & Reasons (if required)			
Conflicts with Policy TB21, CC03, CC02, CP1 and CP3			
Date:	9.8.24	Signed:	B. Crafer