

# **APPENDIX D1**

**Environment Agency letter 14.05.13**

West Berkshire District Office  
Planning Policy  
Council Office  
Market Street  
Newbury  
Berkshire  
RG14 5LD

**Our ref:** WA/2006/000267/SD-04  
**Date:** 14 May 2013

Dear Ms Reid

**Draft Supplementary Planning Document  
Compton Institute for Animal Health site**

Further to my letter dated 14 March 2013 and following our meeting on 23 April 2013, we have the following comments to make.

We understand that land below 103m AOD lies within Flood Zones 2 and 3. We welcome the conclusion of the Flood Risk Sequential Test that 'more vulnerable' development be constructed above the 103m AOD contour line. We would prefer any built development, including 'less vulnerable' to be constructed above the 103m AOD if possible.

Yours sincerely

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## **APPENDIX D2**

**Supporting documentation to consultation  
response from Barton Willmore on behalf  
of landowner – Flooding Technical Note**



## Technical Note

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Project Title:	Institute for Animal Health Site, Compton				
Project No.:	3820	Date:	March 2012	Issue No.:	1
Title:	Representation - Draft Supplementary Planning Document				
Written By:	JP	Checked By:	DF	Authorised By:	DF

### 1.0 Introduction

1.1 This *Technical Note* has been prepared to in order to assess the extent of flood risk posed to the Institute for Animal Health site, Compton for input into West Berkshire Council's planning guidance should the site be redeveloped in the future. This report summarises results from hydraulic modelling work undertaken and accompanies a drawing of modelled floodplain extents.

### 2.0 Policy

2.1 The Local Planning Authority has issued a Draft Supplementary Planning Document (SPD) for consultation. The Council's approach to flood risk issues relevant to the site is to use the 103m AOD contour line as a boundary with only less vulnerable development being allowed below that boundary.

2.2 The Council do however recognise that if modelling work was undertaken then it may be possible to revise the use of the 103m contour line based upon the modelled floodplain extents.

### 3.0 Historic Flooding

3.1 In Section 3.34, the draft SPD advises that '*Flooding also occurred in July 2007 due to a heavy rainfall event which followed a prolonged period of wet weather causing the ground to be fully saturated and groundwater levels to be relatively high*'. West Berkshire County Council has published a review of the flooding which occurred within the Parish's in West Berkshire during the July 2007 floods. The report indicated that storms which occurred in West Berkshire could be designated as a 1 in 169 year return period. A Parish report describes how the streets in the western end of Compton, where the site is located, drain towards the ditch (River Pang channel) which runs adjacent to the High Street. It is anecdotally recalled that the High Street carriageway acted as a channel for floodwater which had overtopped the banks of the ditch. Floodwater is understood to have flowed eastwards towards Cheap Street, with floodwater depths not exceeding the height of the kerbs. This flood height is well below the 103m contour. Indeed if 103m was the flood height, then dwellings located along the High Street (located at a ground level of some 100m) would have flooded to a depth of some 3 metres.

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## Technical Note

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### 4.0 ISIS Model

- 4.1 Cole Easdon Consultants have previously undertaken detailed hydraulic river modelling at the adjacent Green's Yard Site, the extents of which also include the IAH site. The ISIS model and results are based on consideration of fluvial flood risk and was approved by the Environment Agency in 2012.
- 4.2 The model provides flood levels for both the 1:100year event and the 1:1000 year event. The flood depths generated by the model have been mapped against the contours to produce Figure 3820/SK01 – *Floodplain and Modelled Floodplain Extents*.
- 4.3 Figure 3820/SK01 shows that for the 1:100year event there is no floodplain within the site boundary and that for the 1:1000 year event only a small part of the south western corner of the site is affected by flooding. This flood extent is likely caused by the backing up of the Westfields Culvert during the 1:1000year event.

### 5.0 Recommendations

- 5.1 Figure 3820/SK01 shows that the modelled floodplain, even for the 1:1000 year event, is significantly below the 103m contour line and as such it is recommended that Council revise their advice within the Draft SPD accordingly.

March 2013

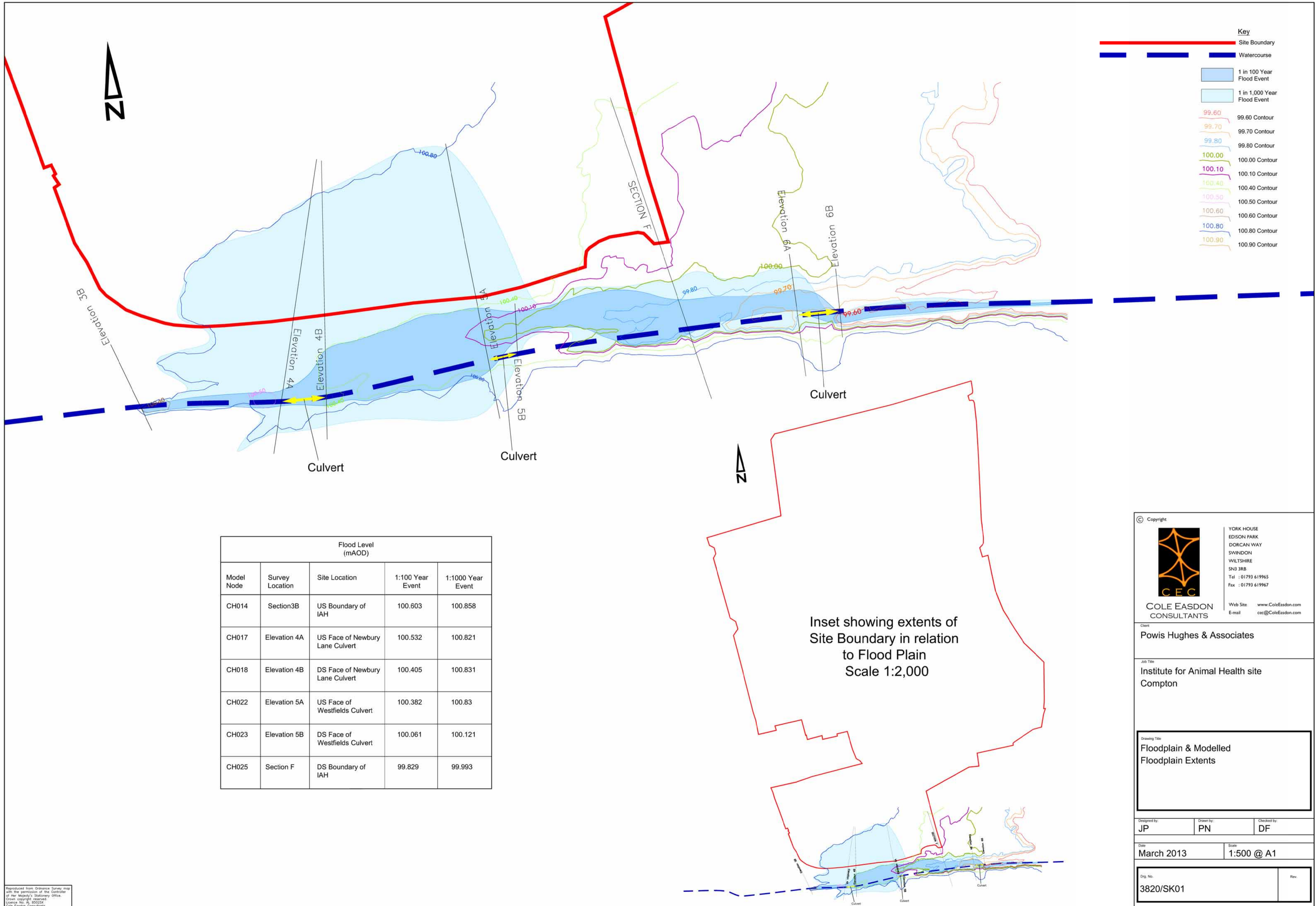
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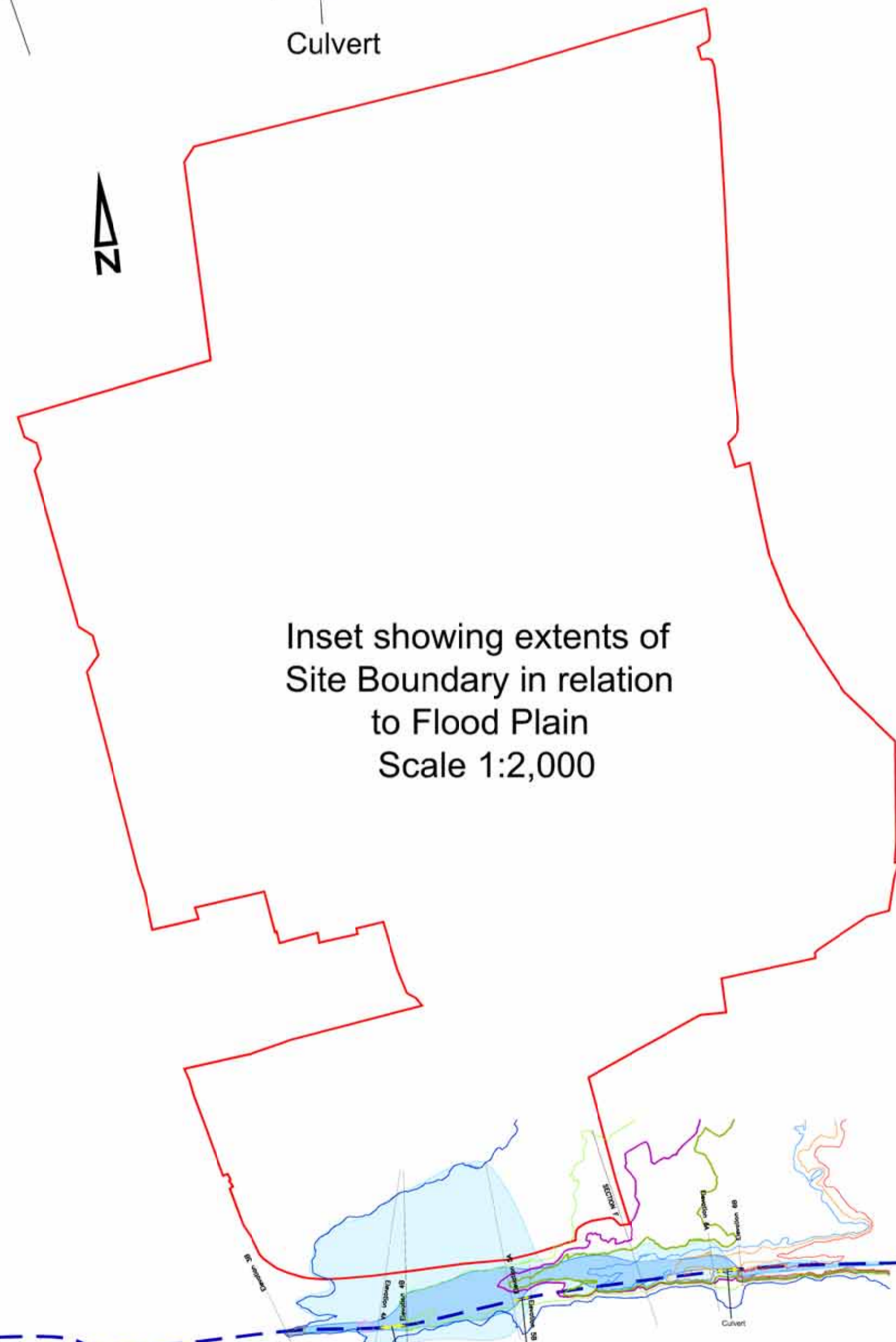
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**Key**

- Site Boundary
- Watercourse
- 1 in 100 Year Flood Event
- 1 in 1,000 Year Flood Event
- 99.60 Contour
- 99.70 Contour
- 99.80 Contour
- 100.00 Contour
- 100.10 Contour
- 100.40 Contour
- 100.50 Contour
- 100.60 Contour
- 100.80 Contour
- 100.90 Contour



Flood Level (mAOD)				
Model Node	Survey Location	Site Location	1:100 Year Event	1:1000 Year Event
CH014	Section3B	US Boundary of IAH	100.603	100.858
CH017	Elevation 4A	US Face of Newbury Lane Culvert	100.532	100.821
CH018	Elevation 4B	DS Face of Newbury Lane Culvert	100.405	100.831
CH022	Elevation 5A	US Face of Westfields Culvert	100.382	100.83
CH023	Elevation 5B	DS Face of Westfields Culvert	100.061	100.121
CH025	Section F	DS Boundary of IAH	99.829	99.993

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Client  
**Powis Hughes & Associates**

Job Title  
**Institute for Animal Health site Compton**

Drawing Title  
**Floodplain & Modelled Floodplain Extents**

Designed by: JP	Drawn by: PN	Checked by: DF
Date: March 2013	Scale: 1:500 @ A1	
Dwg. No. 3820/SK01	Rev.	

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## **APPENDIX D3**

**Supporting documentation to consultation  
response from Barton Willmore on behalf  
of landowner – Landscape and Visual  
Appraisal Advice Note (April 2013)**

Pirbright Institute, Compton  
Landscape and Visual Appraisal Advice  
Note

April 2013



Pirbright Institute, Compton  
Landscape and Visual Appraisal Advice Note

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Date: April 2013

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**APPENDIX 1 : Illustrative Material**

Figure 1 : Landscape and Visual Context Plan at 1: 10,000 scale @ A1

Figure 2 : Site Appraisal Plan at 1: 2,500 @ A3

Figure 3 : Alternative Landscape Framework Plan at 1: 2,000 scale @ A2

Site Appraisal Photographs (A-G)

Site Context Photographs (1 - 13)

## 1.0 INTRODUCTION

1.1□ Barton Willmore Landscape Planning and Design (BWLPD) were commissioned by BBSRC to undertake a review of the Landscape Framework for Land at Compton Institute of Animal Health Supplementary Planning Document, prepared by Kirkham Landscape Practice in November 2012, on behalf of West Berkshire District Council, and to undertake a preliminary landscape and visual appraisal of Land at Institute of Animal Health Centenary Field, Compton, (hereinafter referred to as **the Site**), to determine its potential for redevelopment.

1.2□ Illustrative information is presented on the following plans:

**Figure 1: Landscape and Visual Context Plan at 1:10,000 @ A1□**

**Figure 2: Site Appraisal Plan at 1:2,500 @ A3□**

**Figure 2: Alternative Landscape Framework Plan at 1:2,000 @ A2□**

**Site Appraisal Photographs (A-G)**

**Site Context Photographs (1 - 13)**

## 2.0 SITE CONTEXT

### *Site Location*

- 2.1□ The Site is located on the north western edge of, and adjoins, the settlement of Compton, within West Berkshire. The Site is also located within the North Wessex Downs Area of Outstanding Natural Beauty. The Compton Conservation Area adjoins south eastern boundary, and extends in part into the south eastern part, of the Site as illustrated on **Figure 1: Landscape and Visual Context Plan**
- 2.2□ The Landscape Framework for Land at Compton Institute for Animal Health SPD (hereinafter referred to as the "Landscape Framework SPD") identifies that the Site falls within the North Wessex Downs AONB□notes that the Site is identified as an opportunity site for development in the West Berkshire Core Strategy "July 2012" and makes recommendations for the Site based on the Landscape Policy Context, Landscape Context and the Landscape and Visual Characteristics of the Site.

### *Landscape Planning Context*

- 2.3□ With regard to the Landscape Policy Context of the Site, the Landscape Framework SPD acknowledges correctly that an AONB is a national designation of the highest status of protection with regard to landscape and scenic beauty, in accordance with Paragraph 115, of the National Planning Policy Framework (NPPF) (2012), which notes under *Section 11: Conserving and enhancing the natural environment*, that:

**"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty."**

- 2.4□ The Landscape Framework SPD then recommends that

**"any redevelopment of the Site must ensure that the natural beauty of the AONB is conserved and enhanced through the achievement of the highest quality of design, including siting, the provision of Green Infrastructure, scale and height of built form as well as architectural, urban and landscape design and aesthetics."**

2.5□ The recommendation for the conservation and enhancement of the AONB reflects the primary purpose of AONB designation, as defined in the Countryside and Rights of Way Act, 2000, being:

□

**“conserving and enhancing the natural beauty of the area.”**

2.6□ However, as referred to in the Landscape Framework SPD, it should also be noted that the Countryside and Rights of Way Act, 2000 also states that:

**“In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of economic and social development that in themselves conserve and enhance the environment.**

**Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.”**

2.7□ The NPPF also states that the purpose planning system is to contribute to the achievement of sustainable development□ It also identifies that there are three dimensions to sustainable development: economic, social and environmental□ It is important to note the balance required between these three dimensions in facilitating sustainable development. The NPPF set out the following requirements:

- **an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;**

- **□ a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and**
- **□ an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.**

2.8 □ Furthermore, the NPPF states at Paragraph 116 that:

**“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:**

- **□ the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;**
- **□ the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and**
- **□ any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.**

2.9□ The NPPF also states, with regard to previously developed sites, as is the Site, at Paragraph 111 that:

- **“Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.”**

2.10□ The Landscape Framework SPD draws on key relevant policies of the West Berkshire Core Strategy and the North Wessex Downs AONB.

2.11□ The recommendation that the conservation and enhancement of the AONB is achieved through the redevelopment of the Site through the promotion of the highest quality of design, including siting, the provision of Green Infrastructure, scale and height of built form as well as architectural, urban and landscape design and aesthetics, is acknowledged as good practice and is supported by the policies within the NPPF, West Berkshire Core Strategy and North Wessex Downs AONB Management Plan.

2.12□ However, any recommendations for the Site should also take account of not only environmental objectives, but also of economic and social objectives, in particular creating a high quality built environment, the prudent use of natural resources and the moderation of detrimental effects.

2.13□ The Landscape Framework SPD summarises the key policy issues from a landscape perspective as being:

- □Its location within the North Wessex Downs Area of Outstanding Natural Beauty□
- Its open downland landscape context and visual link with the surrounding landscape□
- Its location immediately adjacent to the existing settlement boundary of Compton□

- Its location immediately adjacent to Compton Conservation Area and its contribution to the setting of this heritage asset and
- It is a brownfield site.

2.14 There is no dispute that these are the key policy issues, however both the interpretation of the recommended objectives stated for the redevelopment of the Site, as set out in the Landscape Framework SPD, and the extent to which the redevelopment of the Site addresses the key policy issues must be based on the existing natural beauty and scenic quality of the North Wessex Downs AONB in the vicinity of the Site and the contribution that the existing Site makes to those attributes of the AONB. Similarly, the determination that brownfield land is of high environmental value, in terms of NPPF paras 110 and 111, must be based on the existing environmental value of the brownfield land.

#### *Landscape Character Context*

2.15 The Landscape Framework SPD draws on the relevant published Landscape Character Assessments. The Landscape Framework SPD primarily draws on the Landscape Sensitivity Assessment of the Potential Impact of the scale and distribution of development in the North Wessex Downs AONB (2011). The report was prepared to assess whether the amount of housing allocated to the North Wessex Downs AONB Spatial Area in the West Berkshire Core Strategy could be accommodated, taking into account the AONB national landscape designation, and to inform the West Berkshire Core Strategy Examination in Public in January 2011

2.16 The Landscape Sensitivity Assessment draws on previous published Landscape Character Assessments, including the following which are relevant to the Site:

- North Wessex Downs AONB Integrated Landscape Character Assessment 2002
- Berkshire Landscape Character Assessment 2003
- Newbury District Landscape Character Assessment 1993
- Historic Landscape Characterisation
- Historic Environment Character Zoning
- An Integrated Landscape Sensitivity Approach to Settlement Expansion within West Berkshire 2009
- Quality Design SPD- Part 3



- Compton Village Design Statement
- Compton Parish Plan (CPP)

2.17□ Section 2.5 of the Landscape Sensitivity Assessment addresses Compton, which is identified as a Service Village within the North Wessex Downs AONB Spatial Area. It identifies that the settlement of Compton, and thus the Site, falls within the North Wessex Downs AONB Landscape Character Area (LCA) 1D: Blewbury Downs.

2.18□ The Landscape Framework SPD quotes the Key Landscape Characteristics, Key Visual Characteristics and Key Settlement Characteristics□and the Summary of Key Characteristics of the Settlement and Landscape Constraints on the extent and location of development, which is particularly relevant to the Site, and states that:

**“The whole of Compton and its hinterland lie within the AONB landscape character area LCA 1D Blewbury Downs. It is recommended that an overriding objective should be that the village remain small and contained within its dry valley setting and ensure that the wider landscape retains its visual qualities and sense of relative remoteness. The northern side of Compton is noted for its openness and it is very important that no development should be visually intrusive. The existing Institute of Animal Health currently detracts from the character of the village (except where it abuts the High Street) and the special qualities of the AONB, and opportunities should be sought to remedy this. Compton also lies on the transition of open downs to the more wooded hillsides to the south, whereby the existing tree cover in the south of the village is of particular value. Most of the settlement lies on lower flat ground at 100 – 115m AOD, either side of the main route through the village. Any proposed development which would result in the loss of woodland cover, would extend up onto higher ground, or would lead to the loss of views into the open countryside is likely to have a detrimental effect on the special qualities of the AONB and the settlement of Compton.**

**The village is also noted for its pattern of generous open spaces within the settlement, many of which are linked**

visually or physically and lead the eye into the surrounding countryside. The village also has a distinctive settlement pattern. The two settlements of Compton and East Compton have distinct characters which should be maintained. The strong rural character of East Compton is a special feature of this area and a valuable contrast to the more modern and economically vibrant main village. The historic core and the pattern of small development plots in Compton require that the scale of any development is important. East Compton would not be able to accommodate any housing in even small estates without significant harm to the AONB. Any proposed development needs to respect these characteristics.

Although Compton has a large site on the edge of the settlement which has long been under some form of development, the development of large and homogeneous estates would detract from the special qualities of this area. Great care will also be needed to minimise the impact on the landscape character of the surrounding AONB, through limitations on the scale of development and generous provision of linked open space, and to mitigate the existing harm to the AONB landscape from intrusive built form as at the Institute of Animal Health and the industrial buildings.”

2.19 □ **Figure 1: Landscape and Visual Context Plan** and **Figure 2: Site Appraisal Plan** illustrate the location of the Site on the north western edge of Compton, and **Figure 2: Site Appraisal Plan** in particular illustrates the extent of existing development on the Site.

2.20 □ With regard to the potential redevelopment of the Site, the key consideration relating to Landscape Character can be summarised as:

- □ Retaining the extent of development within the dry valley setting □
- □ Ensuring that the wider landscape retains its visual qualities and sense of relative remoteness □
- □ Limiting, and potentially, reducing the extent of visual intrusion □

- Create a transition from open downland to wooded hillside from north to south□
- Retention of open views of the countryside□
  
- Reflect the characteristic pattern of settlement within Compton, in terms of scale, form, massing and distribution, and the pattern of open space.

### 3.0 SITE APPRAISAL

- 3.1□ A Site appraisal was carried out in January 2012 to consider the landscape features and character of the Site, and a number of photographs were taken from within the boundaries of the Site to illustrate this. **Site Appraisal Photographs A-G**. These serve to demonstrate the existing character of the Site. The locations from which these photographs were taken are shown on **Figure 2 – Site Appraisal Plan**.
- 3.2□ **Figure 2: Site Appraisal Plan** illustrates the scale, distribution and extent of existing development on the Site. The Site comprises of a mix of research buildings and large scale development, with associated access, hardstanding and car parking.
- 3.3□ The Site lies on the south facing slope of a dry valley, falling from an elevation of just above 120 metres Above Ordnance Datum (AOD) in the north west, to below 100 metres AOD in the south east. However, the topography of the Site has been substantially modified to create large level plateaux to accommodate the existing large scale development on the Site. This broadly divides the Site into three areas, which correlates to Areas A, B and C identified in the Landscape Framework SPD. Area A correlates with the most northern upper flat development plateau on the Site, at an approximate elevation of between 120 metres AOD and 115 metres AOD□ Area B correlates with an adjoining flat development plateau at an approximate elevation of between 115 metres AOD and 110 metres AOD□and Area C correlates with the remainder of the Site, between an elevation of 115 metres AOD and 100 metres AOD, which has a series of smaller more varied development plateaux, reflecting the greater diversity and scale of existing built form disbursed throughout this area.
- 3.4□ **Figure 2: Site Appraisal Plan** also demonstrates the location and distribution of landscape features including existing trees, vegetation and open grassed areas across the Site. The distribution of both built form and landscape features broadly correlates with those identified on *Figure 3: Key Landscape Features to be retained* included within the Landscape Framework SPD.
- 3.5□ **Site Appraisal Photograph A** illustrates the extensive development plateau on the northern part of the Site, Area A, which accommodates the most extensive industrial scale building, and a further three agricultural scale buildings. The majority of the remaining area is covered with hardstanding. Landscape features within this area are limited to a treebelt/hedgerow on the northern boundary and north eastern boundary of the Site□a treebelt/hedgerow between the most extensive industrial

building and the three agricultural scale buildings, and an adjacent area of emerging scrub which has colonised on a spoil mound between these buildings. **Site Appraisal Photograph C** illustrates the relationship with the built form, development plateau and northern site boundary in Area A. The heavily modified landform and large, intrusive building form, as described in the Landscape Framework SPD, are clearly illustrated in these photographs.

- 3.6□ **Site Appraisal Photographs B and D** illustrate the character of Area B. Again, these photographs illustrate extent and scale of the built development and extensive areas of hardstanding within the development plateau. **Site Appraisal Photograph B** is taken from the upper development plateau correlating with Area A, overlooking the lower development plateau correlating with Area B. This area is largely devoid of noteworthy landscape features, with treebelts/hedgerow vegetation limited to the edges of the development plateau, at the changes in level between adjacent development plateaux, as is shown in **Figure 2: Site Appraisal Plan**.
- 3.7□ **Site Appraisal Photographs E, F and G** illustrate the more varied landform of the southern part of the Site correlating with Area C, and also illustrate the greater diversity and scale of existing built form disbursed throughout this area.
- 3.8□ **Site Appraisal Photograph E** illustrates how the landform of the Site falls to the south eastern part of the Site, and illustrates one of the few locations where views out of the Site to the wider landscape are available.
- 3.9□ **Site Appraisal Photograph F** illustrates the eastern boundary of the Site, within Area C, adjoining the Compton Conservation Area. **Site Appraisal Photograph G** illustrates the western boundary of the Site, within Area C.

## 4.0 VISUAL APPRAISAL

- 4.1 □ A visual appraisal was carried out in January 2012 to consider the nature of existing views towards the Site from publicly accessible viewpoints. The views identified in the Landscape Framework SPD were visited, and photographs were taken from these locations, as illustrated by **Site Context Photographs 1 - 13**. All of the views are within the North Wessex Downs AONB, which covers the Site and the wider landscape. The locations from which these photographs were taken are illustrated on **Figure 1: Landscape and Visual Context Plan**. The approximate extent of the Site is identified in each view, as are Areas A, B and C, where this are distinguishable.
- 4.2 □ **Site Context Photographs 1 and 2** illustrate the views towards the Site from the east. **Site Context Photograph 1** is taken from Public Right of Way (PROW) COMP/11/4, from an elevated location. There are distant partial views of the Site, with the upper parts of existing buildings within Areas A, B and C just visible above the intervening landform, as are the upper parts of the chimneys in Area B and C. **Site Context Photograph 2** is taken from PROW COMP/9/1, and again illustrates the visibility of the existing buildings on the Site, set within the existing framework of vegetation on the Site boundary and in the wider landscape. The existing buildings and associated chimneys on the Site are seen in the context of the adjoining residential development within Compton, and existing large scale farm buildings in the intervening landscape. The scale and massing of the buildings on the Site contrasts with that of Compton, reflecting more the scale and massing of the large scale agricultural buildings in the intervening landscape.
- 4.3 □ **Site Context Photographs 3 and 4** illustrate the views towards the Site from the south east. **Site Context Photograph 3** is taken from PROW COMP/22/1, and again illustrates the distance partial view of the Site, visible above the intervening landform, vegetation and existing buildings. The upper parts of existing buildings within Areas B and C are visible, set below the horizon created by rising landform and associated vegetation to the immediate north of the Site. The properties of Superity Cottages and Pumphreys are visible on the horizon above the Site. The chimneys in Areas B and C are also visible, both of which punctuate the horizon. **Site Context Photograph 4** is taken from PROW COMP/14/1, and again illustrates the partial view of the upper parts of the buildings on the Site in Areas A, B and C. The Site is seen in the context of the residential properties in Compton, and set against the treed backdrop of rising land to the north and north-west of the Site, creating the horizon beyond the Site. Some existing buildings in Area B and C

appear just below or on the horizon, with the chimneys in Areas B and C punctuating the skyline.

- 4.4 □ **Site Context Photographs 5, 6 and 7** illustrate the views towards the Site from the south. **Site Context Photograph 5** is taken within the vicinity of Bridleway COMP/21/2. The Bridleway actually passes through a well vegetated route in this location, limiting views out to north. **Site Context Photograph 5** is taken from the open field to the north of the Bridleway. Distant partial views of the existing buildings in Area C, and the chimneys in Areas B and C, and existing buildings in Area A are visible above the intervening landform and vegetation, set below the rising land to the north of the Site. **Site Context Photograph 6** is taken from Cheseridge Road, close to junction with PROW COMP/17/2 (Warnham Lane Bridleway). There are distant glimpses of the Site. However, views of the Site are seen in the context of the village of Compton, and the most discernible features are those which contrast with the scale form and massing of the village, that is the chimneys in Area B and C, the light coloured roofs of the larger existing buildings on the Site. **Site Context Photograph 7** is taken from Hampstead Norreys Road, adjacent allotments west of Downs School. Areas B and C of the Site are partially visible, with the chimney in Areas B and C punctuating the skyline. The buildings within Area B are also visible on the skyline.
- 4.5 □ **Site Context Photograph 8** is taken adjacent to the western boundary of the Site, looking east over Area B.
- 4.6 □ **Site Context Photographs 9 and 10** illustrate the views towards the Site from the north. **Site Context Photograph 9** is taken from Churn Road, Byway COMP /2/1, looking south towards the Site. The rising landform to the north of the Site screens views of all of the existing buildings on the Site, except the upper part of the chimneys in Areas B and C. **Site Context Photograph 10** is taken from PROW COMP/25/1, which runs in part along the northern boundary of the Site. Existing buildings within Area C are partially visible, seen across the open grassland to the immediate north of the Site, and through the filter of trees and vegetation on the northern boundary of the Site. The chimney in Area C is visible above the treeline along the northern boundary of the Site, and above the horizon created by the distant downland. There are also prominent open views of the large scale existing buildings and the chimney in Area B.

- 4.7□ **Site Context Photograph 11** is taken from Hockham Road, Bridleway COMP/3/1, adjacent to the eastern boundary of the Site, looking over Area B. The large scale existing buildings are partially visible, seen through a filter of vegetation running along the eastern boundary of the Site and Hockham Road.
- 4.8□ **Site Context Photographs 12 and 13** illustrate the views looking north towards the Site from within the village of Compton, from Westfields and the High Street respectively. Views of the Site are generally limited to the existing buildings and the chimney within Area C.



## 5.0 LANDSCAPE AND VISUAL OPPORTUNITIES AND CONSTRAINTS FOR RESIDENTIAL DEVELOPMENT

5.1□ The assessment of landscape and visual opportunities and constraints for redevelopment on the Site includes consideration of relevant landscape policy context, the landscape character in the vicinity of the Site, landscape features within and surrounding the Site and visibility into the Site from publicly accessible viewpoints.

5.2□ The appraisal of the Landscape Planning Context identified the following key policies issues that require addressing in any redevelopment of the Site:

- Its location within the North Wessex Downs Area of Outstanding Natural Beauty□
- Its open downland landscape context and visual link with the surrounding landscape□
- Its location immediately adjacent to the existing settlement boundary of Compton□
- Its location immediately adjacent to Compton Conservation Area and its contribution to the setting of this heritage asset□and
- It is a □rownfield□site.

5.3□ The appraisal of the Landscape Character Context of the Site identified the following key considerations:

- Retaining the extent of development within the dry valley setting□
- Ensuring that the wider landscape retains its visual qualities and sense of relative remoteness□
- Limiting, and potentially, reducing the extent of visual intrusion□
- Create a transition from open downland to wooded hillside from north to south□

- Retention of open views of the countryside□
  - Reflect the characteristic pattern of settlement within Compton, in terms of scale, form, massing and distribution, and the pattern of open space.
- 5.4□ In considering the above, and the existing landscape and visual characteristics of the Site, in particular the extensive developed plateaux on the Site and the visual intrusion that the existing buildings create within views towards the Site within the North Wessex Downs AONB, an alternative Landscape Framework Plan has been prepared, which responds to the landscape and visual opportunities and constraints of the Site, and is illustrated on **Figure 3: Alternative Landscape Framework Plan**.
- 5.5□ **Figure 3: Alternative Landscape Framework Plan** illustrates the following principles for redevelopment of the Site:
- Retention and enhancement of the existing key landscape features on the Site, broadly in accordance with *Figure 3: Key Landscape Features of the Site to be retained* as set out in the Landscape Framework SPD, including:
    - Retention and enhancement of the Cricket Ground and associated mature trees to maintain the existing frontage with Compton High Street, to form a key open space within the redeveloped Site and to form part of a wider network of open space throughout the redeveloped Site.
    - Retention and enhancement of the mature vegetation running between, and along the level changes between, Area A and B, and Area B and C, to maintain the existing network of vegetation across the Site, which would inform the more extensive hierarchy of proposed Green Infrastructure throughout the redevelopment of the Site.
    - Retention and enhancement of the boundary vegetation along Hockham Road/Bridleway COMP/3/1 and Churn Road/Byway COMP/2/1, to maintain and enhance the existing framework of vegetation within which the Site is set, and is characteristic of the landscape of the North Wessex Downs AONB in the vicinity of the Site□and to maintain the filtering effect of existing boundary vegetation in views of the Site from

the PROWS/Byways/Bridleways, the wider landscape and the North Wessex Downs AONB.

- Retention, enhancement and integration of the existing vegetation along the northern and north western boundaries within a landscape buffer□to maintain the existing vegetated backdrop to the Site in views from the south□maintain and enhance the existing filtering effect of the vegetation in views of the Site from PROWS/Byways/Bridleways□ and create a transition between the northern extent of redevelopment and the open downland to the north of the Site.
- Retention of selected existing mature trees and planting of additional large specimen trees on eastern edge of Site, to create a mature attractive setting to accommodate redevelopment and to create an positive interface between the redevelopment and the adjoining village of Compton and Compton Conservation Area.
- Removal of large scale buildings across the Site, and re-use of the existing development plateaux, including:
  - Replacement of the existing large scale buildings with a development of a scale, massing, form and materials more in keeping with the character of the village Compton and the Compton Conservation Area, with the replacement of visually prominent large scale built form with development of smaller massing and scale, of a more recessive character, on the existing development plateaux on the Site, with the overall significant beneficial effect on the North Wessex Downs AONB.
  - Replacement of existing large scale buildings with development of smaller scale and massing, with the careful consideration of siting to allow for an increase in views out of the Site to the wider countryside and North Wessex Downs AONB.
  - Replacement of existing large scale development with a finer grained development to enhance permeability and connections with the wider countryside and North Wessex Downs AONB.

- Redevelopment of Area B and C with medium to high density development set in a high quality Landscape Framework, creating an attractive setting for the redevelopment□contributing to the proposed Green Infrastructure network across the Site□and creating a framework of vegetation within which the redevelopment would be set to assist in assimilating it into the immediate and wider context.
- Redevelopment of Area A with low-medium density development, of a smaller scale and massing than that of the existing built form, set within a robust Landscape Framework□not only to provide an attractive setting for the redevelopment and to contribute to the wider proposed Green Infrastructure network across the Site□but also to provide a transition from the northern extent of the redevelopment and the open downland to the north of the Site. This would include the creation of a broad landscape buffer on the northern boundary of the Site, incorporating the existing retained boundary vegetation, re-profiling the steep northern bank to Area A and creating areas of grassland and enhanced boundary planting to provide an appropriate transition to the open downland to the north.
- Utilisation of the existing development plateaux, with some re-profiling of the topography of the Site to provide a more sympathetic landform to accommodate the proposed redevelopment, considering the prudent use of the existing characteristics of the Site, to minimise waste and pollution arising from the redevelopment of the Site, and making best use of previously developed land.
- Create a positive frontage to the boundary and interface with the Compton Conservation Area and the existing settlement boundary of the village of Compton, through adopting good practice and high quality design, including the careful consideration of siting, the provision of Green Infrastructure, scale and height of built form in relation to the adjacent Conservation Area and settlement edge, and the consideration of architectural style and urban and landscape design.

## 6.0 CONCLUSIONS

- 6.1□ In conclusion, the landscape and visual appraisal demonstrates that the Site is capable of accommodating development, in accordance with **Figure 3: Alternative Landscape Framework Plan**, responding positively to the landscape policy context, the landscape character in the vicinity of the Site, landscape features within and surrounding the Site and visibility into the Site from publicly accessible viewpoints.
- 6.2□ The removal of the existing large scale buildings on the Site will have a significant beneficial effect on the character of the North Wessex Downs AONB, reducing the visual prominence of conspicuous built form within the landscape, thus remedying the detraction of the Site from the character of the village and the special qualities of the AONB, as recommended in the Landscape Sensitivity Assessment.
- 6.3□ Utilising the existing development plateaux, including Area A, B and C, on the Site would prudent use of the existing characteristics of the Site, assist in minimising waste and pollution arising from the redevelopment of the Site, and make best use of previously developed land. This would facilitate the sustainable redevelopment of the Site, in accordance with the principles and policies of the NPPF, in considering not only environmental factors, but economic and social factors and the best use of previously developed land as well.
- 6.4□ Redeveloping Areas A, B and C would not extend development any further into the North Wessex Downs AONB, any redevelopment would still be contained within the existing dry valley setting of the Site and the village of Compton, and with the reduction in visual prominence of conspicuous built form within the landscape, there would be still be a considerable beneficial effect on the landscape, ensuring that the wider landscape retains its visual qualities and existing sense of relative remoteness.
- 6.5□ It is concluded that there is no sound basis to exclude Area A from the developable area. The Landscape Framework SPD identifies that Area A has no on-site environmental features of particular value and that the existing quasi-industrial buildings visually detract from the AONB. As such, Area A cannot be identified as an area of high environmental value in terms of the NPPF provision for the effective use of brownfield land, which should be based on the land's existing condition. The Landscape Framework SPD also acknowledges that, even with the removal of the

existing building, rectifying the damage caused by past development *“is probably not a realistic option”* and *“a return to arable or chalk downland is probably not an option”*.

- 6.6 □ The landscape and visual impact on the North Wessex Downs AONB arising from redevelopment of the Site can be minimised by careful consideration of siting □ form, scale and massing of built form □ choice of materials □ and the generous provision of a landscape framework to accommodate the development, not only providing an attractive setting for any redevelopment but also providing a comprehensive Green Infrastructure network across the Site, providing a transition from the edge of proposed development to the open downland to the north, and creating a framework of vegetation within which the redevelopment would be set to assist in assimilating it into the immediate and wider context.
- 6.7 □ Therefore the Site could be redeveloped, adopting the Alternative Landscape Framework as illustrated on **Figure 3: Alternative Landscape Framework Plan**, positively responding to the landscape policy and landscape character context of the Site, and in accordance with the recommendation of the West Berkshire Landscape Framework SPD, albeit with an alternative more sustainable Landscape Framework Plan, such that the redevelopment of the Site would:

**“ensure that the natural beauty of the AONB is conserved and enhanced through the achievement of the highest quality of design, including siting, the provision of Green Infrastructure, scale and height of built form as well as architectural, urban and landscape design and aesthetics.”**

**APPENDIX 1 : Illustrative Material**

Figure 1 : Landscape and Visual Context Plan at 1: 10,000 scale @ A1

Figure 2 : Site Appraisal Plan at 1: 2,500 @ A3

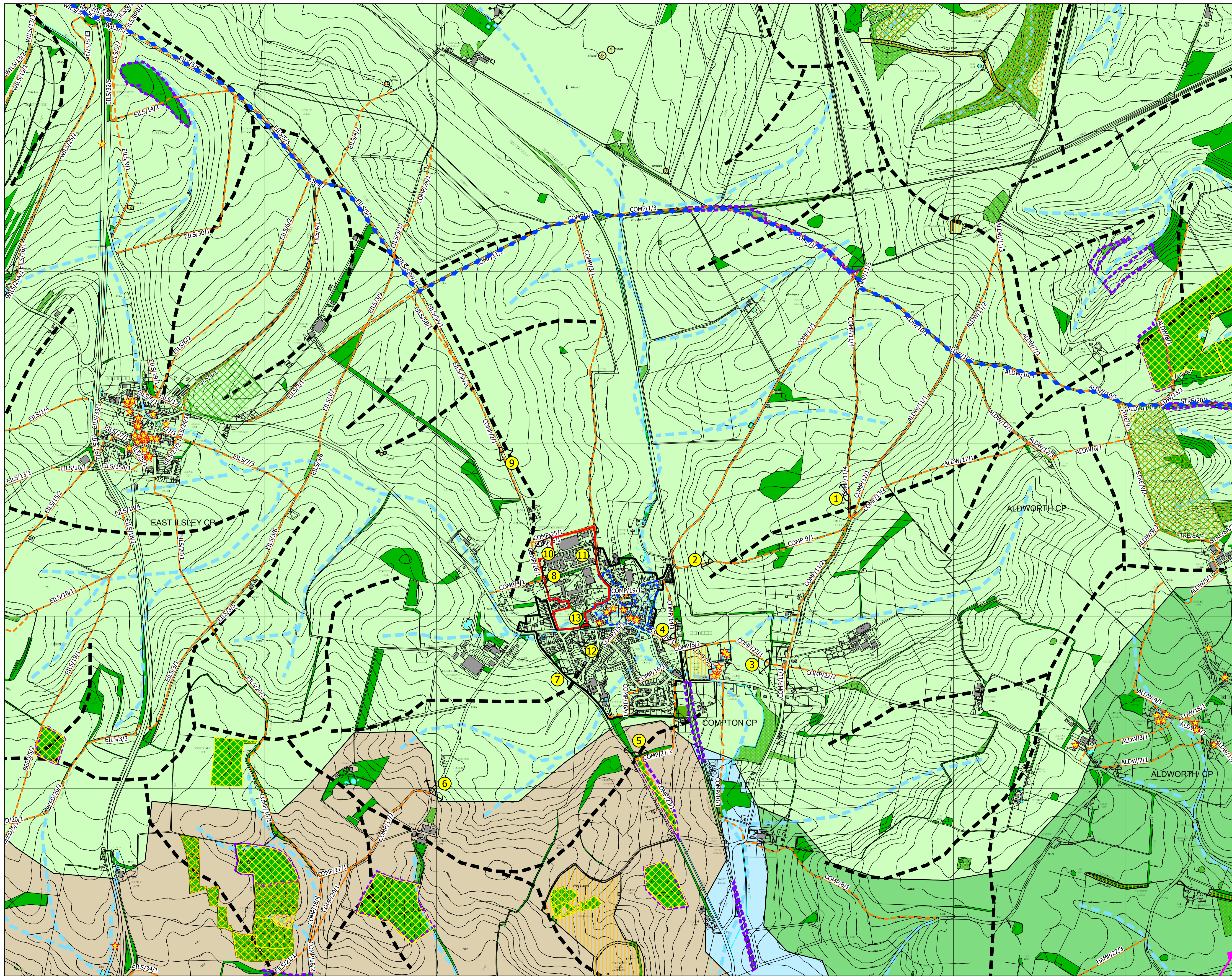
Figure 3 : Alternative Landscape Framework Plan at 1: 2,000 scale @ A2

Site Appraisal Photographs (A-G)

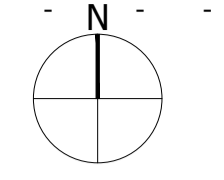
Site Context Photographs (1 - 13)

**Figure 1**  
**Landscape and Visual Context Plan at 1:10,000 scale @ A1**





The scaling of this drawing cannot be assured  
 Revision \_\_\_\_\_ Date \_\_\_\_\_ Dm \_\_\_\_\_ Ckd \_\_\_\_\_



### Legend

- Site Boundary
- Existing Woodlands, Copses and Tree Belts @
- Ancient Woodland □
- Existing Water Courses @
- Contours/Spot Heights (Metres AOD) @
- Ridgelines
- Valleys
- Public Rights of Way □
- National Trails / Long Distance Walks □
- Countryside Rights of Way Access Areas □
- Listed Building □
- Scheduled Monument □
- Sites of Special Scientific Interest □
- Conservation Area □
- Local Wildlife Sites □
- Settlement Boundary □
- National Landscape Character Areas □
- 116, Berkshire and Marlborough Downs
- North Wessex Downs AONB Landscape Character Areas +
- Character Area 1A: Blwbury Downs
- Character Area 2A: Brightwalton Downs
- Character Area 2B: Ashampstead Downs
- Character Area 7D: Pang Valley
- Visual Appraisal
- Location of Photographic Viewpoints (Site Context Photographs: 1-13)

**Figure 1**  
 For Illustrative Purposes Only

Project  
**Institute for Animal Health,  
 Compton**

Drawing Title  
**Landscape and Visual Context  
 Plan**

Date 22.01.2013 Scale 1:10,000 @A1 Drawn by ML Check by LT  
 Project No 20470 Drawing No L1 Revision -

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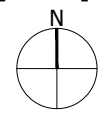
Reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO. Crown Copyright Reserved. Licence No. 100019279.

K:\2000-2099\2040-20499\20470 - Animal Health Institute, Compton\A4 - Dwg & Registers\Landscape\20470 L1 Landscape & Visual Context Plan.dwg - A1












**Figure 2**  
**Site Appraisal Plan at 1:2,500 @ A3**



The scaling of this drawing cannot be assured  
 Revision \_\_\_\_\_ Date \_\_\_\_\_ Drn \_\_\_\_\_ Ckd \_\_\_\_\_



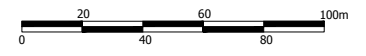
**LEGEND**

-  Site Boundary
-  Contours/Spot Heights (Metres AOD)
-  Ridgelines
-  Valleys
-  Public Rights of Way
-  Settlement Boundary
-  Conservation Area
-  Listed Building
-  Tree Preservation Order
-  Area Reference Number
-  Location of Photographic Viewpoints (Site Appraisal Photographs: A-G)

**Figure 2**  
 For Illustrative Purposes Only

Project  
 Institute for Animal Health,  
 Compton  
 Drawing Title  
 Site Appraisal Plan

Date 10.01.2013	Scale 1:2,500 @A3	Drawn by ML	Check by LT
Project No 20470	Drawing No L2	Revision -	



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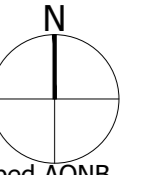
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**Figure 3**  
**Alternative Landscape Framework Plan at 1:2,000 scale @ A2**

**LEGEND**



-  Site Boundary
-  Contours/Spot Heights (Metres AOD)
-  Public Rights of Way
-  Settlement Boundary
-  Conservation Area
-  Listed Building
-  Tree Preservation Order
-  Landscape Buffer to Undeveloped AONB
-  Hierarchy of Green Infrastructure Based on Retention of Existing Vegetation
-  Positive Road Frontages: Complementary Urban Forms and Landscape Treatments
-  Landscape Treatment to Road Frontage
-  Proposed Development set within Selected Retained Existing Trees
-  Existing Boundary Vegetation Retained and Enhanced
-  Proposed Open Space
-  Existing Development Plateau Suitable for Redevelopment. Low - Medium Density. Proposed Development to be of smaller scale than existing, set within a robust Landscape Framework to assimilate Proposed Development into landscape beyond
-  Existing Development Plateaux Suitable for Redevelopment. Medium - High Density Development. Proposed Development set within high quality Landscape Framework to create an attractive setting for development, and frontage to Conservation Area to integrate Proposed Development with the surrounding village of Compton.



**Figure 3**  
 For Illustrative Purposes Only

Project  
 Institute for Animal Health,  
 Compton

Drawing Title  
**Alternative Landscape Framework  
 Plan**

Date 23.01.2013 Scale 1:2,000@A2 Drawn by MN Check by LT

Project No 20470 Drawing No L3 Revision -



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**Site Appraisal Photographs (A – G)**



**SITE APPRAISAL PHOTOGRAPH A: AREA A**



**SITE APPRAISAL PHOTOGRAPH B: AREA B**

**INSTITUTE FOR ANIMAL  
HEALTH, COMPTON**

**SITE APPRAISAL  
PHOTOGRAPHS A & B**

**JANUARY 2013**

**PROJECT NO. 20470**

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SITE APPRAISAL PHOTOGRAPH C



SITE APPRAISAL PHOTOGRAPH D: AREA B

INSTITUTE FOR ANIMAL  
HEALTH, COMPTON

SITE APPRAISAL  
PHOTOGRAPHS C & D

JANUARY 2013

PROJECT NO. 20470

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SITE APPRAISAL PHOTOGRAPH E: AREA C



SITE APPRAISAL PHOTOGRAPH F

INSTITUTE FOR ANIMAL  
HEALTH, COMPTON

SITE APPRAISAL  
PHOTOGRAPHS E & F

JANUARY 2013

PROJECT NO. 20470

**BARTON  
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Western Boundary of the Site



**SITE APPRAISAL PHOTOGRAPH G**

**INSTITUTE FOR ANIMAL  
HEALTH, COMPTON**

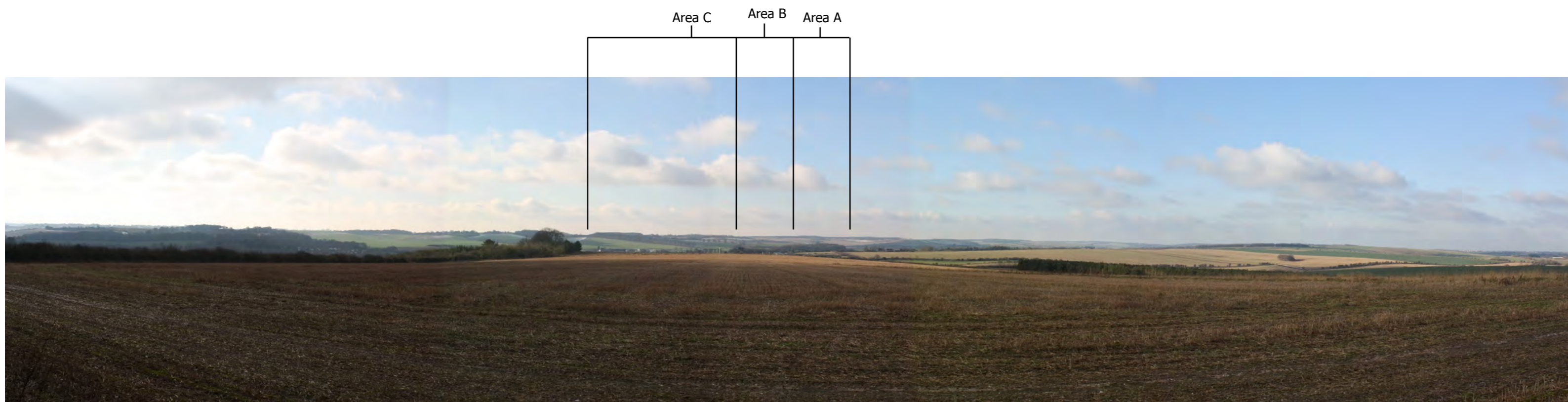
**SITE APPRAISAL  
PHOTOGRAPHS G**

**JANUARY 2013**

**PROJECT NO. 20470**



**Site Context Photographs (1 - 13)**



**SITE CONTEXT PHOTOGRAPH 1: VIEW WEST TO THE SITE FROM BYWAY COMP/11/4 TO THE NORTH OF CROWS FOOT.**



**SITE CONTEXT PHOTOGRAPH 2: VIEW WEST TO THE SITE FROM BERKSHIRE CIRCULAR WALK, BRIDLEWAY COMP/9/1.**

**INSTITUTE FOR ANIMAL  
HEALTH, COMPTON**

**SITE CONTEXT  
PHOTOGRAPHS 1 & 2**

**JANUARY 2013**

**PROJECT NO. 20470**

**BARTON  
WILLMORE**

Approximate Extent of the Site



**SITE CONTEXT PHOTOGRAPH 3: VIEW NORTH-WEST TO THE SITE FROM PUBLIC RIGHT OF WAY COMP/22/1, BETWEEN DOWNS ROAD AND THE OLD STATION.**

Approximate Extent of the Site



**SITE CONTEXT PHOTOGRAPH 4: VIEW NORTH-WEST TO THE SITE FROM PUBLIC RIGHT OF WAY COMP/14/1, EAST OF OPEN SPACE WEST OF THE OLD STATION.**

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**SITE CONTEXT  
PHOTOGRAPHS 3 & 4**

**JANUARY 2013**

**PROJECT NO. 20470**

**BARTON  
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Approximate Extent of the Site



**SITE CONTEXT PHOTOGRAPH 5: VIEW NORTH TO THE SITE FROM NORTH OF BRIDLEWAY COMP/21/2, OFF HAMPSTEAD NORREYS ROAD NEAR HAWK CROFT COPSE.**

Approximate Extent of the Site



**SITE CONTEXT PHOTOGRAPH 6: VIEW NORTH-EAST TO THE SITE FROM CLOSE TO JUNCTION OF CHESERIDGE ROAD AND WARNHAM LANE BYWAY.**

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HEALTH, COMPTON**

**SITE CONTEXT  
PHOTOGRAPHS 5 & 6**

**JANUARY 2013**

**PROJECT NO. 20470**

**BARTON  
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Approximate Extent of the Site



**SITE CONTEXT PHOTOGRAPH 7: VIEW NORTH-EAST TO THE SITE FROM HAMPSTEAD NORREYS ROAD NEXT TO THE ALLOTMENTS BY THE DOWNS SCHOOL.**

Area B

Area C



**SITE CONTEXT PHOTOGRAPH 8: VIEW FROM CHURN ROAD, PUBLIC RIGHT OF WAY COMP/26/1, ADJACENT TO THE SOUTH-WESTERN CORNER OF AREA B**

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**SITE CONTEXT  
PHOTOGRAPHS 7 & 8**

**JANUARY 2013**

**PROJECT NO. 20470**

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**SITE CONTEXT PHOTOGRAPH 9: VIEW SOUTH TO THE SITE FROM CHURN ROAD, BYWAY COMP/2/1, ON THE DOWNS.**



**SITE CONTEXT PHOTOGRAPH 10: VIEW SOUTH TO THE SITE FROM PUBLIC RIGHT OF WAY COMP/25/1.**

**INSTITUTE FOR ANIMAL  
HEALTH, COMPTON**

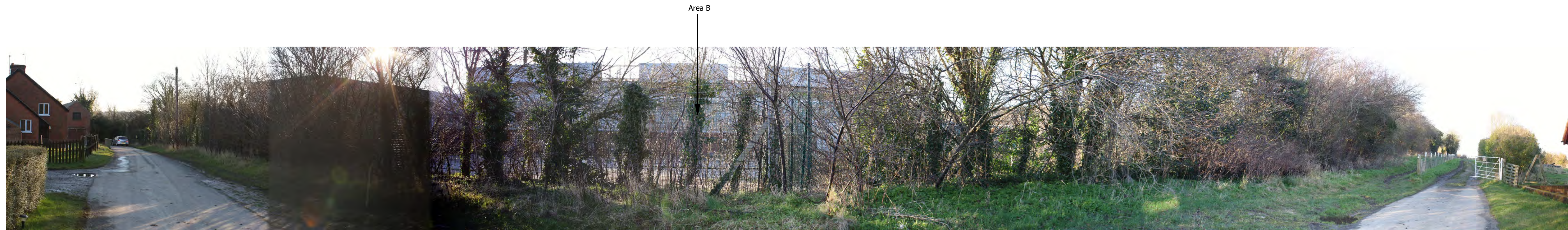
**SITE CONTEXT  
PHOTOGRAPHS 9 & 10**

**JANUARY 2013**

**PROJECT NO. 20470**

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SITE CONTEXT PHOTOGRAPH 11: VIEW WEST TOWARDS THE SITE, FROM HOCKHAM ROAD/BRIDLEWAY COMP/3/1, ADJACENT TO THE EASTERN BOUNDARY OF THE SITE.



SITE CONTEXT PHOTOGRAPH 12: VIEW NORTH TO THE SITE FROM RESIDENTIAL STREETS, WESTFIELDS. TREES MARK THE SKYLINE.

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SITE CONTEXT  
PHOTOGRAPHS 11 & 12

JANUARY 2013

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Area C



SITE CONTEXT PHOTOGRAPH 13: VIEW NORTH FROM HIGH STREET, COMPTON, LOOKING AT THE ENTRANCE OF THE SITE.

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SITE CONTEXT  
PHOTOGRAPHS 13

JANUARY 2013

PROJECT NO. 20470





SITE CONTEXT PHOTOGRAPH 1 - ZOOMED



SITE CONTEXT PHOTOGRAPH 2 - ZOOMED



SITE CONTEXT PHOTOGRAPH 2 - ZOOMED



SITE CONTEXT PHOTOGRAPH 3 - ZOOMED

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SITE CONTEXT  
PHOTOGRAPHS

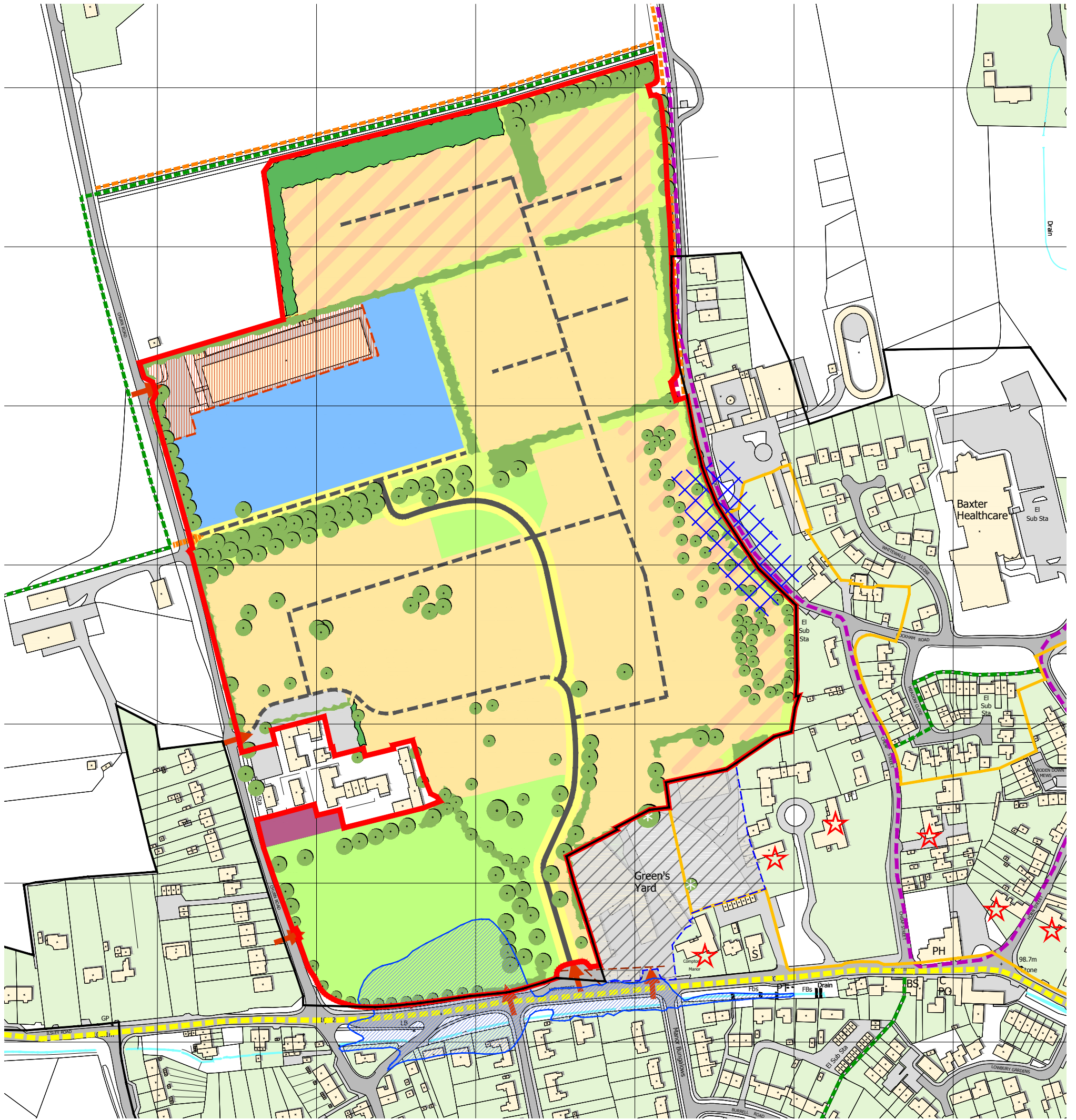
JANUARY 2013

PROJECT NO. 20470

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# **APPENDIX D4**

**Supporting documentation to consultation  
response from Barton Willmore on behalf  
of landowner – Concept Master Plan  
(Option 2)**

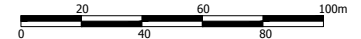


- |                         |  |   |
|-------------------------|--|---|
| Site boundary           | Existing tree planting with possible TPO's                           | Privately leased land (boundary to be confirmed)          |
| Residential             | Existing tree planting   | Settlement boundary                                       |
| Low density residential | Existing hedgerow planting   | Conservation Boundary                                     |
| Mixed use               | Proposed planting  | Possible emergency access point                           |
| Employment              | Flood Boundary (Source: Cole Easdon Consultants - dwg no. 3820/SK01) | Existing buildings  |
| Open space              | Listed buildings   | Limited access to residential properties off Hockham Road |
| Formal open space       | Site access points   | Green's Yard Separate Extant Planning Permission          |
| Existing development    | Public footpath  |   |
| Access infrastructure   | Bridleway  |   |
| Proposed car park       | National trail / long distance route                                 |   |

Note:  
Trees may be removed as part of the site remedial strategy

Project  
**Animal Health Institute  
Compton**  
Drawing Title  
**Concept Master Plan  
Option 2**

Date 18.03.13	Scale 1:2500@A3	Drawn by ALC/TPS	Check by CR
Project No 19005	Drawing No 04	Revision C	



**WORKING DRAFT**

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# **APPENDIX D5**

**Council response to the supporting  
documentation to consultation response  
from Barton Willmore on behalf of  
landowner – Flooding Technical Note**

# CAPITA SYMONDS

## Technical Note

28 May 2013

**To** Dawn Reid (West Berkshire Council)  
**CC** Louise Tattersall (Capita Symonds)  
**Subject** Institute of Animal Health, Compton

### Introduction

In February 2013 West Berkshire Council published its Draft Supplementary Planning Document (SPD) which outlined the planning guidance for future development at the Institute of Animal Health (IAH) Site in Compton, West Berkshire. A flood risk study was carried out to inform the SPD by Capita Symonds in December 2012. The study highlights the risk of flooding at the site and provides a number of recommendations based on the assessment of flood risk. The conclusions of the report are not repeated here and the report should be read alongside this technical note. The main conclusion of the report was that *More Vulnerable development should only be located above 103m AOD with Less Vulnerable Development considered to be appropriate below this level.*

Following the publication of the SPD, Cole Easdon Consultants produced a Technical Note (March 2013) which was submitted as part of the statutory consultation response from Barton Willmore, requesting that the above conclusion be revised. West Berkshire Council requested that the Cole Easdon Technical Note be reviewed and a response provided. This technical note therefore provides a response by Capita Symonds to the information presented by Cole Easdon Consultants and recommends that the existing conclusion should be retained.

The following section provides the justification for this and why the above conclusion must remain within the SPD.

### Summary of Cole Easdon Technical Note (March 2013)

The essence of the Cole Easdon Technical Note is that:

- a) The flooding observed during the event of July 2007 was not observed to have exceeded 103m AOD;
- b) If the floodwater had reached 103m AOD in July 2007 then dwellings along High Street would have flooded to a depth of at least 3m; and
- c) An ISIS model of the River Pang, which was developed for the adjacent Greens Yard site and considered acceptable by the Environment Agency, does not show the extent of fluvial flooding to impact the site in a 1 in 100 year event and only affects a small part of the site in a 1 in 1000 year event.

The Cole Easdon Technical Note, therefore, essentially concludes that none of the above is consistent with a level of 103m AOD and that therefore the main conclusion of the SPD should be reviewed and revised accordingly.

Also provided by West Berkshire Council was the consultation response to the SPD and supporting documents by Barton Willmore. This consultation response also referenced flood modelling for the Greens Yard FRA, arguing that the conclusions of the FRA demonstrates no flood risk within the site and that the application of the Sequential Approach at the site level utilise the results of this FRA in isolation.

In our opinion, the arguments presented paint a simplistic picture of flooding within Compton, they are selective with respect to the evidence used to support flood risk related planning decisions and in particular with respect to the information on groundwater, and they fail to fully explore the distinction between fluvial and groundwater flooding mechanisms and impacts. The following therefore discusses each of the points individually and draws attention to additional evidence and discussion within the Flood Risk Study.

#### **Point a)**

The Flood Risk Study acknowledges that the July 2007 event was due to an intense rainfall event, believed to be equivalent to a return period of approximately 1 in 169 years, that followed a period of prolonged wet weather that had caused the groundwater levels to be elevated and soils to be saturated.

That flood water was routed along High Street is not disputed. That the flooding that was observed was not at 103m AOD is also not disputed.

It is noted that the consultation response fails to comment on all of the flooding records from July 2007, which show locations in which flooding was recorded at levels between 100m AOD and 105m AOD. Furthermore it doesn't comment on records of groundwater flooding at a level of approximately 103m AOD from the flooding in 2000. The response also doesn't comment on the demonstrated strong link between fluvial and groundwater flooding in this highly permeable catchment and as such it implies that the flooding in 2007 was solely due to fluvial mechanisms and that the site is solely at risk from fluvial sources.

#### **Point b)**

Point b) argues that a flood level of 103m AOD should result in flooding throughout Compton at a level of 103m AOD, with corresponding depths of 3m or more along High Street, and that because this was not observed in July 2007 then this level cannot be an appropriate flood level at which distinctions between appropriate types of development are based.

Starting with the factual correctness of the statement, it should be clear that the Flood Risk Study does not state or imply that the July 2007 flood level was 103m AOD. Figure 5 presents an indication of recorded flooding incidents from this event, most of which are in the 100m AOD to 101m AOD range with a few that are 103m AOD and above 105m AOD.

It should also be clear that the level of 103m AOD is a recommendation for making a distinction between the location of Less Vulnerable and More Vulnerable development within this site. The recommendation of 103m, presented in Section 4.5.20, was developed from more than just the events of July 2007. The recommendation was also developed from analysis of historical flooding records from an event in 2000 as well as analysis of groundwater levels within the area over a period of time that covers before and following the implementation of the Environment Agency's West Berkshire Groundwater Pumping Scheme.

It should also be noted that the argument implies that flood water would extend from a level of 103m horizontally to some other location, inundating all areas below that level. This is clearly not a statement that is made in the Flood Risk Study and indeed such a mechanism would not and could not exist within a river



valley such as this. Were the site a basin then perhaps it would have some basis, however, use of this argument in this situation implies a failure to understand the mechanisms of groundwater flooding.

Following on from this it should be noted that Section 4.5.21 outlines the mechanisms of groundwater flooding that would be expected, should groundwater flooding be experienced at a level of 103m AOD. It is clearly acknowledged that there is some uncertainty as to exactly how this would develop within the site, but that groundwater emergence as overland flow, ponding and the reactivation of winterbournes may occur, causing nuisance if not issues to developments below this level. Indeed, Section 4.5 discusses the anticipated frequency at which a level like this may occur at the Compton Observation Borehole and also relates the groundwater levels seen in 2000 and 2007 to a return period, which are between a 1 in 10 and 1 in 25 and a 1 in 5 year event respectively. Following the assessment of groundwater levels it is anticipated that similar conditions could be experienced relatively frequently and with potentially increasing frequency in the future.

### **Point c)**

The Flood Risk Study undertook a review of the Green Yard FRA study as part of the data collection and review stage. As indicated in the Flood Risk Study, the hydrological analysis and hydraulic modelling undertaken for that FRA uses standard methodologies that are applicable to most sites. Misgivings were noted that the FRA dismisses the risk of groundwater flooding within Compton despite there being records of groundwater flooding during the flood events of 2000 and 2007. In addition during these events the Environment Agency were required to operate the West Berkshire Groundwater Pumping Scheme.

Section 4.3 of the Capita Symonds Flood Risk Study outlines the strong link between annual rainfall patterns, groundwater levels and river flow at the downstream gauge at Frilsham, which is ignored in the Green Yard FRA. Section 1 of the Capita Symonds Flood Risk Study also outlines the reasons why standard FEH hydrological methods do not appropriately reflect all of the influences on flood response that take place within highly permeable catchments. The issues with standard methods can make accurate and robust conclusions using such methods difficult to obtain, which is something that the Environment Agency's own guidance on Flood Estimation acknowledges.

For these reasons, and despite the apparent approval of Greens Yard FRA by the Environment Agency, it is considered that the results of the Green Yard FRA should be treated with caution. It is likely that the hydraulic model itself is a reasonable reflection of the flows that have been applied to it, however, the concern is that the methods used to estimate flows don't give sufficient weight or consideration to groundwater and may therefore be an underestimation under extreme conditions.

### **Summary**

The Capita Symonds report recognises the complexity of the flood risk sources at the site but, giving equal weight to each source, considers that there is a potential risk from high groundwater levels within the site. The information available confirms that groundwater flooding and groundwater influenced flooding has historically occurred and with a relatively high frequency and that on at least two occasions within the last 13 years this has caused flooding within Compton. There is therefore inherently a risk from more severe events with higher return periods and from other sources that can be influenced by groundwater levels.

Having reviewed the comments made in response to the IAH SPD and its supporting documents, in our opinion there remains either an ignorance of the groundwater flood risks or a general dismissal of them. The arguments presented have not challenged the information collated on groundwater levels and its influence on flooding in any way and have made a simplistic but inaccurate argument to dismiss the main recommendation of the report, relating it solely to the events of July 2007.

As a result, neither the Cole Easdon Consultants nor Barton Willmore consultation responses are considered sufficient to reconsider or change any recommendations made in the Capita Symonds Flood Risk Study.

**Phil Raynor**  
**Associate Director**  
**Capita Symonds**

## **APPENDIX D6**

**Council response to the supporting  
documentation to consultation response  
from Barton Willmore on behalf of  
landowner – Landscape and Visual  
Appraisal Advice Note (April 2013)**

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## **COMPTON INSTITUTE FOR ANIMAL HEALTH SITE**

### **DRAFT SPD FEBRUARY 2013**

#### **Response to Consultation Response from Barton Willmore dated April 2013**

1. The following documents submitted by Barton Willmore have been reviewed:
- Parts A and B of Comments by Barton Willmore
  - Concept Master Plan Option 2 dated 18.03.13 (Option 2)
  - Landscape and Visual Appraisal Note April 2013 (the Note).

#### **General comments**

2. In many respects the above documents support the approach taken in the SPD and the supporting document Landscape Framework November 2012. There is no objection to the SPD Development Principles. However Barton Willmore requests three main changes to the SPD. My comments mainly address item 1, but item 3 also has landscape and visual implications:
- 1.  Revised proposals for Area A, with additional changes to the scale of development in Areas B and C;
  - 2.  Changes to the text referring to the flood risk assessment; and
  - 3.  Greater flexibility in density over the site, specifically: medium to high density in Areas B and C; and medium to low density in Area A. No figures are provided on what number of dwellings per hectare would constitute high, medium or low density.
3. A balance needs to be struck between the brownfield nature of Areas A, B and C, which is accounted for in the SPD and Landscape Framework: and a) its extent and character as a result of the history of IAH development; b) the type of development envisaged for a service village under the development plan which would normally be of 'limited additional development'; and c) the significance of the site's location within the AONB. The economic need for the level of housing proposed in the Concept Master Plan Option 2 is outside of the remit of my response.
4. Barton Willmore has not indicated the number or type of dwellings that might be delivered through Option 2 at the densities proposed. Similarly they do not provide information on indicative building heights to support their preferred option. The Note does not demonstrate how these proposals might be accommodated in accordance with the SPD Development Principles.

5. The SPD notes that 2 storey high houses are typical of Compton and sets out a number of criteria against which the landscape and visual impact of the built form would be tested. Principle D3 states that the height of buildings should be in proportion to their surroundings. D1 requires an appropriate mix of dwelling sizes and types which conserve and enhance the character of the village. LCI requires that any redevelopment should respond positively to the local context of Compton and conserve and enhance the natural beauty of the AONB.

### **Part B of Comments by Barton Willmore**

6. The Landscape Framework November 2012 (which draws on the Landscape Sensitivity Report 2001) examined both the landscape and visual attributes of the site and its landscape and townscape setting, including that of the surrounding AONB in some detail. The existing character of Area A is clearly set out and acknowledged, as is the intrusive nature of the existing buildings on this part of the site.
7. The 'blanket' restriction for Area A is in response to the acknowledged landscape and visual intrusion arising from existing development on the site. The development of Areas B and C will remove some unsightly buildings in Area B (and better quality development in Area C) but will also create a large residential estate which even at low density will increase the land under buildings and hard surfacing, changing the character of the site. Given the location of Area A and proposed extensive redevelopment of Areas B and C, the SPD's proposed landscape enhancement of all of Area A, through the removal of built form mass on the edge of the village and open space provision, would meet the objectives of conserving and enhancing the AONB and character of the village and surrounding landscape.
8. Area A may not be of high intrinsic environmental condition but it is in an area of the highest landscape value. All parts of the AONB are subject to the purposes of the AONB.

### **Landscape and Visual Appraisal Note April 2013 (the Note)**

9. The Note supports the inclusion of Area A in the development area, development within the SPD area of green infrastructure west of Hockham Lane and alternative green infrastructure principles as set out in Option 2.
10. The Landscape Framework November 2012 is a supporting document for the SPD not SPD in its own right.
11. *Landscape policy:* The Note plays up the economic aspects of NPPF and the existing site conditions of this brownfield site. The quote in para 2.6 comes from the North Wessex Downs Management Plan page 8 but the reference to CROW 2000 Act para 82 is inaccurate (now agreed with Barton Willmore). However NPPF and the other primary legislation must be considered as a whole and have regard to environmental and design considerations and the great weight to be given to conserving the landscape and scenic beauty of the AONB. The policies in NPPF apply together with the requirements of CROW Act 2000 paras 82 and 85 and the 1949 Act where the primary purpose of the AONB is to conserve and enhance the natural beauty of the AONB.

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12. *Landscape character context:* The Note endorses the evidence base used in the SPD and Landscape Framework.
  13. *Site appraisal:* The Note Figure 2 agrees with both the SPD and the Landscape Framework. Section 3 is also in agreement with the SPD and Landscape Framework with the exception of para 3.8 which suggests that there are few views out of the site to the wider landscape. The Landscape Framework Figure 3 shows key long distance views but there are other views out from within the site as shown in the photographs. Retention and enhancement of views out to the wider landscape from the site development is important in creating a new townscape character in keeping with the local landscape and visual characteristics (Development Principle LC3).
  14. *Visual appraisal:* The Note looks at the viewpoints identified in the Landscape Framework and agrees with the location of the main views. I generally agree with the Note's assessment of the existing views but make the following observations:
    - a) Area A extends well to the north of the village beyond the edge of the village. It is surrounded on 3 sides by open countryside. Areas B and C are also intrusive and by limiting the extent of development to Areas B and C, the impact of redevelopment would be mitigated, thus conserving and enhancing the AONB. The cumulative impact of Areas A, B and C would not achieve this, and housing in Area A would result in a significant tongue of urban form extending into the landscape. (See View 2 for example).
    - b) View 9: the top of the buildings in Area A are also visible above the landform.
    - c) View 10: Includes views of Area A.
  15. *Alternative Landscape Framework:* See my comments on Option 2 below.
  16. The Note suggests medium to high density development for Areas B and C. It is not clear what this might be but an urban style form of development would not be acceptable or accord with the SPD development principles, or the purposes of the AONB. The Note goes on to promote a low to medium density in Area A which would also not be acceptable for the same reasons. See conclusion on Area A below.
  17. A positive frontage to the village is welcomed but I do not believe that the Alternative Framework or Option 2 achieve this – see comments on Option 2 below.
  18. There is no doubt that the removal of the existing built form in Areas A and B will benefit the AONB. However the extent of reuse of previously developed land must take into account other aspects of landscape and design policy at the national and local level; and the impact of the proposed development as a whole. The Note does not take this into account.
  19. The Note provides no evidence to support its thesis that the proposed development in Option 2 would not harm the landscape and visual characteristics and natural beauty of the AONB, or the village of Compton. There is no assessment of how Option 2 would satisfy the SPD Development Principles.

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**Concept Master Plan Option 2 and Figure 3 Alternative Landscape Framework Plan**

20. Much of this reflects the SPD with some particular exceptions:

- Proposed housing development in Area A;
- Low density development along the west side of Hockham Road and access into Hockham Road within area of existing open space with trees which forms the setting of the Conservation Area and is proposed as green infrastructure in the SPD;
- Residential development within SPD's western belt of green infrastructure in Area C;
- Proposed tree belt along western and northern boundary of Area A;
- A note that trees may be removed as part of site remediation;
- No provision for footpath links across the site (within green infrastructure) to connect to existing PROWs;
- Insufficient and inappropriate landscape green infrastructure (shown designed to screen rather than integrate development);
- No consideration of views and vistas;
- Additional lighting impact through the proposed residential development of Area A.

21. **Low density development along the west side of Hockham Road and access into Hockham Road**

This area has a number of trees and creates a landscape setting to the Conservation Area. It is also a part of the rural character of Hockham Road in the transition from the more built up centre of the village to the very low density edges. Option 2 would not conserve or enhance the Conservation Area or its setting. This is also not the most suitable point to link the new development on the site into the adjoining built form as it would erode the character of Hockham Road at this point. Option 2 is not supported and is not in accordance with Development Principles LC1; LC4; HE1; and D2.

22. **Residential development within western belt of Areas B and C set aside for green infrastructure in the SPD**

The SPD seeks to pull the open landscape setting of the site into the western edge of Areas B and C to create improved landscape and visual links with the adjoining countryside. Option 2 would urbanise Churn Road north of the village boundary point (Figure 4 Landscape Framework). The development edge should remain pulled into the site to allow for a soft open edge of a good width east of Churn Road. Option 2 is not in accordance with Development Principles LC4; G11; and G12.

23. **Proposed tree belt along western and northern boundary of Area A**

This seems designed to screen development in Area A from views from the footpath and Churn Road. The SPD seeks to create a more transitional irregular soft edge to the settlement with visual links to the wider landscape. Option 2 supports Development Principles LC2; LC7; and G11 in part but planting along these boundaries must also be in accordance with LC1; LC3; and G12.

24. **A note that trees may be removed as part of site remediation**

This is a concern given the importance of the existing trees on the site in integrating any development into the landscape. Development Principles LC1; LC2; LC4; LC7; and BI apply.

25. **No provision for footpath links across the site (within green infrastructure) to connect to existing PROWs**

The SPD seeks to ensure a high level of pedestrian permeability, linking into the wider PROW network, and running through green infrastructure links. Option 2 does not reflect this and is not in accordance with SPD Development Principles G14.

26. **Insufficient and inappropriate landscape green infrastructure**

Option 2 shows housing development in areas that would lead to a loss of existing open space and the erosion of narrow tree lines to the western boundary. The proposed extent and density of housing in Option 2 is unlikely to enable substantial and appropriate provision of a framework of internal green infrastructure in keeping with the settlement character and to substantially break up the built form. The SPD seeks to allow better integration with the village and its landscape setting as set out in the SPD and Landscape Framework. Option 2 is therefore not acceptable and is not in accordance with Development Principles LC1; LC2; G11; G12; and BI.

27. **No consideration of views and vistas**

This is a key development objective and needs to be a part of any master plan option. Option 2 is not in accordance with Development Principles LC2; LC3; and G12.

28. **Additional lighting impact**

The extension of a large area of housing in Area A will result in considerable additional lighting impact on the AONB. This would not be in accordance with Development Principles LC1; LC5; and LI or the objectives of the AONB.

29. **Conclusion on residential development in Area A as shown in Option 2**

- a) The proposed housing development area is shown across most of Area A, retaining the existing tree planting belts and introducing new belts to the north and west. This would increase the area covered by development in Area A (the east of Area A is predominantly open with an agricultural character). Housing would also be of a similar height to the existing sheds and extend the mass of built form over the whole area resulting in an increase in harm to the AONB. Area A will also appear virtually contiguous with Area B creating an estate which is of a scale which is out of keeping with Compton and the AONB settlement pattern.
- b) Area A is most visible from the adjoining PROW and from the east, locations where the village is to the south and do not form the setting of Area A. Area A is



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surrounded on three sides by open countryside and appears above and beyond the settlement edge. Development in Area A would give rise to additional harm to the visual qualities and sensitive receptors of the AONB.

- c) Residential development is not appropriate on this part of the site. Any alternative options put forward should meet the Development Principles of the SPD and the current option by Barton Willmore does not achieve this. The primary purpose of Area A should therefore remain in the SPD as a key area of open space.

30. In conclusion, Barton Willmore has not demonstrated that their proposed changes are in accordance with the purposes of the AONB and the Development Principles set out in the SPD. On the contrary, the scale and location of development proposed in Option 2 would result in unacceptable harm to the AONB, the Conservation Area and the character of the landscape and townscape setting. The benefits of removing the existing built form and the current brownfield character of the site have already been given proper consideration in the Landscape Framework and the SPD and a greater scale of extent of development would not be acceptable.