DC/19/1940/RM

Reserved Matters Application - Submission of details under Outline Planning Permission DC/15/2151/OUT

Submission of details for the reserved matters access, appearance, landscaping, layout and scale for 503 dwellings (parcels A1, A2 and A8) and associated internal roads, car parking, landscaping, amenity and public open space.

Application to Partially Discharge Conditions 4 (Updated survey information), 6 (waste and recycling), 7 (Landscape and Ecological Management Plan), 8 (Landscape), 15 (Open space strategy), 28 (Garage /parking provision), 30 (Travel Plan - Residential), 40 (Arboricultural method statement), 42 (Ecological implementation strategy), and 45 (Biodiversity monitoring) of DC/15/2151/OUT

The following comments deal only with the Submission of details for the reserved matters. The information submitted has not been reviewed in sufficient detail to support the discharge of conditions.

Housing Parcel A1

The requirements of the site and main constraints were set out in the outline planning application and the proposals should be consistent with the parameters set out. The thumbnails below are taken from the Land-use parameter plan, illustrated masterplan, PRoW parameter plan (green = existing, pink = proposed), Habitat loss and creation plan and the Bat lighting mitigation strategy.



For housing parcel A1 the adjacent strategic landscaping to the east has been set out and would be provided as part of planning application DC/19/0834/RM. However strategic woodland to the northern and western boundary would need to be provided. The main issues to be addressed are:

- Woodland planting to the north and west of the development
- Enhancement of the existing PRoW to the west
- Protection of existing trees and woodland to the west
- A dark corridor is retained on the western boundary
- Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network
- Integration with the strategic landscaping to the east
- Amenity of the development through the provision of soft landscaping
- Landscaped frontage with the primary road to the south to protect the new residents' amenity and security

Woodland planting to the north and west of the development

The Land-use parameter plan, masterplan, and habitats plan all show woodland planting to the north west of the development. The landscaping proposals are more aligned to parkland planting with a wide shrub border on the edge of the development and some specimen trees. The PRoW would be best served if it remains open to some extent with views from the houses that overlook the route providing informal surveillance. However, this is not achieved by the current landscape proposals.

It is recommended that the proposals are amended to ensure that overall; this area has a woodland feel; that views are retained (beneath the canopy if necessary) through to the path; that the proposals to improve the field margins are made clear; and that there are measures to protect the field margins during the construction phase.

The width of the woodland appears to be constrained by plots 10-12 and 40. The plans indicate that there would be no space for any meaningful planting in this location. The visitor parking space should be removed from the shared surface west of plot 12.

All the car parking areas should be screened from view of the PRoW and woodland users, for example close to plots 59 and 60.

Enhancement of the existing PRoW to the west

The PRoW is shown to be a width of 2m, retained on its existing alignment. It's not clear from the key what the new surface would be. The Council has found Breedon gravel to be an acceptable option. This could be conditioned.

Protection of existing trees and woodland to the west

The proposals for tree protection adjacent to the woodland suggest a low intensity tree protection fencing. Whilst it is agreed that where the development is set back from the woodland a lower intensity fencing could be used, it would be unacceptable for this not to be fixed into the ground. Recommend that, notwithstanding the details submitted, the specification for this fence is conditioned.

It is not clear from the plan how the existing hedge to the north of the parcel will be protected during the construction period. The position and extent of tree protection fencing should be clarified and the tree method statement amended.

A dark corridor is retained on the western boundary

It appears that there is enough space for a dark corridor to be maintained on the western boundary except where the pinch point occurs close to plots 10-12 and 40. In this location the combination of the proximity of the development and the presence of a shared surface turning head indicate that the dark corridor would be broken. The current design is not consistent with the parameters set out in the bat lighting strategy which required an off set of min. 10m between properties and any hedgerow or edge of woodland, and 15m min distance off set between street lighting and a hedgerow or edge of woodland. The applicant should be required to demonstrate that the dark corridor can be maintained by submitting a lighting contour plan. If necessary, the design should be amended to ensure a dark corridor is maintained.

It is not clear how the dark corridor will be maintained across the A143

Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network

In general, the parcel is well connected.

Integration with the strategic landscaping to the east

The landscape proposals are not clear, it is difficult to distinguish between the different types of grass and whether the woodland wraps around the north eastern corner of the site. There is no woodland planting on the key.

The car parking outside of plots 19 and 20 extends unacceptably close to the cycle footway through the strategic landscaping, with little room for a visual barrier. The car parking should be removed.

Lighting of the shared surface (between plots 20 and 38) has the potential to affect the dark corridor through the strategic landscaping as it is located in a position north of the bat hop and south of the woodland where there is little other planting to shield any spill. The applicant should be required to demonstrate that the dark corridor can be maintained by submitting a lighting contour plan. Alternatively, the design should be amended to ensure a dark corridor is maintained.

Amenity of the development through the provision of soft landscaping

The central pocket park will make a significant contribution to this parcel. Planting details will need to be submitted by condition. The planting should ensure that the space does not become too enclosed.

Amenity grass mixes should be limited to private properties. Other areas should utilise floral lawn mix, particularly on the boundaries of the parcel – this can be mown to provide a close cropped sward if necessary, but will also enhance biodiversity.

A visual screen is required where shared surfaces lead directly to the parcel boundaries to reduce light spill, particularly from car movements, into the strategic open space.

At the entrance to the site, the avenue of trees on the secondary street are located very close to the highway – 1m from the back of the footway. The trees are *Prunus spire* which is a small tree 3-8m in height and of a narrow habit and root barriers are provided, so should be acceptable. However, if highways are unwilling to accept this relationship the trees should be replaced by suitable specimen shrubs.

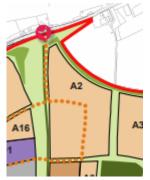
Landscaped frontage with the primary road to the south to protect the new residents' amenity and security

The hedges and trees make a valuable contribution to the street scene. It is noted that the trees are shown to be 2.5m from the back of the footway

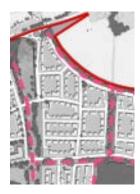
In relation to the planting detail (which is to be considered via the planning condition), for the hedges, native mixed species hedges are welcomed. However, the use of *Prunus spinosa*, blackthorn, in the context of the housing parcels is not appropriate – this species suckers readily, has spines and drops fruit so is likely to cause a nuisance to the new residents and a management liability. *Ilex aquifolium*, holly, is inappropriate adjacent to footpaths and access points. If *Crataegus monogyna* is to be used in locations close to dwellings, the foundations of these should reflect the fact that this is a high-water demand species. It is recommended that the species composition of these hedges, and those throughout this parcel is reconsidered. Other species that should be limited within hedges close to gardens, access points and private areas include *Rosa canina*, dog rose. Tree species such as *Prunus avium* bird cherry, and *Malus sylvestris* are probably more appropriately used in hedges which have sufficient room to be maintained at a greater height. These comments apply to all parcels.

Housing parcel A2

The requirements of the site and main constraints were set out in the outline planning application and the proposals should be consistent with the parameters set out. The thumbnails below are taken from the Land-use parameter plan, Illustrated masterplan, PRoW parameter plan (green are existing, pink are proposed), Habitat loss and creation plan and the Bat lighting mitigation strategy.









For parcel A2, strategic landscaping to the west has been set out and would be provided as part of planning application DC/19/0834/RM. However strategic woodland to the northern boundary and a green corridor to the east would need to be provided. The main issues to be addressed are:

- Provision of Woodland belts to the northeast to form the new urban edge to Haverhill
- A dark corridor is retained on the northern boundary
- A green corridor is provided on the eastern boundary of the development
- New PRoW is provided on the northern boundary connecting to the eastern green corridor and the wider network
- Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network
- Amenity of the development through the provision of soft landscaping
- Integration of this parcel with the strategic landscaping to the west including protection of existing trees
- Landscaped frontage with the primary road to the south to protect the new residents' amenity and security
- Integration of this parcel with the strategic landscaping to the south east

<u>Provision of Woodland belts to the northeast to form the new urban edge to</u> Haverhill

The width of woodland belts for the development is addressed in the Environmental Assessment ES (Environmental Statement Volume 2 Main Report—August 2015) and in the ES Addendum (Environmental Statement Volume 4 Addendum - May 2016).

The ES in section 15.6.2 states:

The existing site has a well-established and well managed landscape framework of woodland blocks, tree belts, hedgerows and trees along the River Stour tributary. This structure provides the basis on which a robust Green Infrastructure will be established. Green Infrastructure will be delivered in accordance with the St Edmundsbury Green Infrastructure Strategy projects E.3 and E.7 and will include structural woodland planting to the north and north east of between 10-30m in width to enhance the containment of the site within the wider landscape as well as

providing additional landscape habitats for biodiversity and local landscape enhancement.

In section 15.6.8 the features of the land-use parameters plan are described. Bullet point 5 reads:

Woodland planting around the northern and eastern boundaries will help to screen the development and will also add to the structural landscape. Linear woodland and small woodland blocks are a characteristic feature of the area.

ES Addendum in section 14.2.6 reads:

The incorporation of tree belts is an integral part of the vision for the development of this site. They are shown in the diagram attached to the Concept Statement as noted by Historic England, however, this diagram was indicative only and contained no suggested dimensions for these planting belts. Similarly, although the Masterplan for the site contains no dimensions for these screening belts, their breadth has been considered and are proposed to be approximately 15m, which is considered typically appropriate for this type of structural planting and has been assessed to be adequate to ensure that development will not be visible once the planting is established. The structural planting will take the form of woodland belts and the species and maturity of specimens can be controlled by the Council to ensure rapid establishment and adequate seasonal cover.

The woodland belt to the northeast of this parcel is a key landscape feature and part of the structural woodland planting referred to in the ES. It is shown consistently on all the parameter plans including the land-use parameter plan. The proposals show a planting strip of between approximately 2 to 8m in width which comprises a hedge, native planting (mostly shrubs), and some specimen trees. The proposals fall short of the expectations as illustrated in the masterplan and land-use parameter plan and as described in the ES. The development proposals would not be adequately screened from the surrounding landscape.

A dark corridor is retained on the northern boundary

The planting on the northern boundary is not consistently wide enough to ensure that the dark corridor proposed is established and effective once the development is occupied and operational. The current design is not consistent with the parameters set out in the bat lighting strategy which required an off set of min 10m between properties and any hedgerow or edge of woodland, and 15m min distance off set between street lighting and a hedgerow or edge of woodland. In addition to increasing the width of the woodland planting, the applicant should be required to demonstrate that the dark corridor can be maintained by submitting a lighting contour plan. The design should be amended to ensure a dark corridor is maintained.

A green corridor is provided on the eastern boundary of the development

The green corridor appears to be narrow and does not reflect the width of that shown on the land-use parament plan. The width of the corridor together with the arrangement of planting proposed would limit significantly the contribution this feature will make to the overall GI. It might be that a similar amount of green space is to be provided on the other side of the ditch with parcel A3. This does not appear to be the case in the phasing plan.

The adjacent urban development will heavily influence the character of the route particularly as there are many car parking spaces, roads and driveways immediately adjacent to the space that are not screened from the footpath users.

It is not clear how the ditch will be accessed for maintenance – I presume from the field side.

New PRoW is provided on the northern boundary connecting to the eastern green corridor and the wider network

In the north, the corridor is disconnected from the northern structural woodland by the turning head for the secondary street. Whilst in the fullness of time this road may lead to the adjacent development parcel (as indicated in application DC/20/0358/RM), in the meantime good connectivity for pedestrians and cyclists should be maintained. This might be better achieved if the path were not forced to follow the edge of the highway around the turning head.

Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network

The parcel is generally well connected to the surrounding infrastructure. The exception is close to plots 19 and 20 where the connection is made to a private drive. However, it is noted that the opportunities here are limited and there is another connection to the north off the shared surface.

Connection to the eastern green corridor for pedestrians and cyclists close to plots 88 and 101 is obstructed by car parking and the proposals should be amended to ensure access is free.

Amenity of the development through the provision of soft landscaping

The pocket park and the additional 'footpath connections' make a contribution to the sense of place of this parcel and provide opportunities for tree and shrub planting.

The 'footpath connection' between parcels 119 and 120 should be amended so that pedestrians are not encouraged to cross into the middle of the principal street junction. A solution might be to curve the footpath to the south so that it focuses on the pocket park. The tree could be moved to the north of the path to provide a focus when viewed entering the parcel on the principal street.

See above for additional points in relation to hedgerow species used. The following points apply to all parcels -

The proposals should be reviewed to ensure that the maintenance liability is managed through ensuring that very small areas are planted with shrubs to reduce mowing, or seeded with low maintenance grass seed/wildflower seeds (for example close to hedges) which will contribute to biodiversity if left unmown.

Grass beneath a knee rail is unlikely to be cut and more likely to be sprayed so is best avoided.

The knee rail detail should be amended to include a metal rail (rather than wooden)

<u>Integration of this parcel with the strategic landscaping to the west including protection of existing trees</u>

The development proposals are not consistent with the recommendations of the tree method statement and tree protection plan. Tree group G24C is shown to be protected with high intensity tree protection fencing and this is welcomed. However, the proposals infringe the no construction zone. The visitor car parking spaces on the private drive and shared surface between plots 14 and plot 19 should be removed or relocated to allow the trees to be adequately protected. This would also allow clearance between the development and the existing ditch which is to be retained.

Lighting of the shared surface (between plots 14 and 15/16) has the potential to affect the dark corridor through the strategic landscaping particularly as it is located very close to existing trees and habitat that is to be retained. The current design is not consistent with the parameters set out in the bat lighting strategy which required an off-set of 15m min distance between street lighting and a hedgerow or edge of woodland. The applicant should be required to demonstrate that the dark corridor can be maintained by submitting a lighting contour plan. Alternatively, the design should be amended to ensure a dark corridor is maintained.

<u>Landscaped frontage with the primary road to the south to protect the new residents' amenity and security</u>

The road to the south of the development benefits from the hedgerow to the south which contributes to the character of the road. However, the one tree fronting this road appears to be approximately 1m from the back of the highway. It's unfortunate that there is not more space around the two large blocks of flats, as trees would help to soften and frame these buildings.

Integration of this parcel with the strategic landscaping to the south east
It is not clear how the green corridor in the east will connect with parcel A3, the path should be shown to continue to the east.

Housing parcel A8

The requirements of the site and main constraints were set out in the outline planning application and the proposals should be consistent with the parameters set out. The thumbnails below are taken from the Land-use parameter plan, Illustrated masterplan, PRoW parameter plan (green = existing, pink = proposed), Habitat loss and creation plan and the Bat lighting mitigation strategy.











For parcel A8, strategic landscaping to the north has been set out and would be provided as part of planning application DC/19/0834/RM. However existing habitats to the south east will need to be retained and enhanced, and the PRoW to the west will need to be accommodated. The main issues to be addressed are:

- Retention and enhancement of a safe and open PRoW to the west
- Provision of a new PRoW on the north boundary and appropriate easement for maintenance of the ditch. Integration of this parcel with the strategic landscaping to the north.
- A dark corridor is retained on the northern boundary
- Retention and enhancement of the existing habitats to the east of the development including the measures required for protection of the existing trees, and long-term management.
- Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network
- Amenity of the development through the provision of soft landscaping including the acceptability of tree-pit detail adjacent to the highway
- Landscaped frontage of the development with Chalkstone Way

<u>Provision of a new PRoW on the north boundary and appropriate easement for maintenance of the ditch. Integration of this parcel with the strategic landscaping to the north</u>

The PRoW parameter plan is clear that 'all footpaths are 2.0m wide with a combined footway/cycleway at 3.0m'. The proposals show an easement of approximately 3.5m between the enlarged ditch south of Southern Plantation and the knee rail north of A8. Given the gradient and depth of the SUDs ditch, this appears to be a very narrow easement to accommodate a 2m wide path (particularly if the safety audit requires additional barriers).

Of additional concern is the width of the footpath easement in the northwest corner of the site where the gas governor/ss and the enlarged ditch reduce the easement to 2.5-3m. The amenity of footpath users on this new path and on the existing PRoW is significantly impact by the location of this infrastructure.

It should not be possible to drive from the shared surface (between 217 and 218) onto the proposed footpath easement.

Plot 234 appears to have an entrance off this grass path which is likely to be unacceptable to the new residents

A dark corridor is retained on the northern boundary

There are no proposals for a visual barrier between the dwellings on the north side of A8 and the woodland. In addition, there are shared surface roads that abut the parcel boundary which will require lighting. The applicant should be required to demonstrate that the dark corridor can be maintained by submitting a lighting contour plan. If necessary, the design should be amended to ensure a dark corridor is maintained.

Retention and enhancement of the existing habitats to the east of the development including the measures required for protection of the existing trees, and long-term management.

The tree protection plan(TPP) has not been updated to show how the trees and shrubs to the east of the development will be protected. High intensity TPF should be used where development is close to existing trees and woodland habitat for example between plots 256 and 264.

In general, the quality of the TPPs is poor, and it is not clear how the trees around the parcel will be protected.

The proposals and future management of the woodland area need to be more detailed. It is not sufficient to make sweeping statements such as *Woodland compartments in A8 will be thinned to allow understorey shrub development.*Planting proposals should be indicated on the planting plans or in plans within the LEMP. More information on the coppicing and hedge-laying need to be included to give confidence that these management operations will be undertaken and to indicate when.

It is not clear why the wooded area is fenced completely. The boundary to plot 264 should be hedged on its south eastern and south western boundaries to protect the new resident's privacy.

Connectivity from the development parcel to the adjacent strategic footpaths, cycle routes, open space and wider PRoW network

Connectivity from the development to the PRoW in the east is poor. There are existing informal paths through the existing woodland that should be mapped and connections made. Where possible these informal routes and connections should be retained.

It might be more appropriate to provide a surfaced path from opposite plot 237 on the southern side of the existing SUD directly to the existing PRoW to the east. This could be achieved within the red line. The path shown, on the western side of the SUD could then be the same status as the path it joins in the north.

An additional link should be considered from the shared surface at plot 261 to join with the existing PRoW on the eastern boundary. This should tie into the informal network of paths in the woodland (possibly the route on the south west of the more mature woodland block).

It would be helpful if the planting proposals for the chalkstone way roundabout were presented alongside the detailed planting.

Amenity of the development through the provision of soft landscaping including the acceptability of tree-pit detail adjacent to the highway

The character of this parcel is very urban. Given the size of the parcel there are few opportunities for amenity planting and trees. Some tree planting along the streets has been planned. A tree pit specification (EXA_1868_703) has been submitted which shows the use of soil cells beneath hard paving areas to provide sufficient rooting space for trees. The below surface footprint is shown on the plans. This approach is welcomed however for this to be an acceptable approach the highway authority must be in agreement. The proposals would not be acceptable if these trees cannot be delivered.

Where *Malus* spp. is used it must be certain that any fruit will drop within private gardens and not on footways or roads.

Some trees, with no soil-cells seem very close to the highway – plot 136 (this is a big tree to have a root barrier less than a metre away from the stem, plot 111, plot 14, plot 17.

Landscaped frontage of the development with Chalkstone Way

The footpath to this frontage is welcomed, however a barrier should separate the footpath from the shared surface road and private drives. An estate rail would be the most appropriate. Ideally this should continue along this path towards plot 62. The alignment of the estate rail (and the hedge at plot 65) should follow the curve of the path.

It is not clear what the lumps are in the space west of 63-65.

Retention and enhancement of a safe and open PRoW to the west

The PRoW to the west is considered to be a route to school and as such it should be open and safe for pedestrians to use. Whilst the northern part of the route benefits from informal surveillance, being open to the adjacent development, the southern part of the path is unlikely to have the same open character. In this 100m stretch, rear garden boundaries back onto the path and shrub and tree planting is proposed which will further enclose the route. Whilst some planting would be beneficial, the scale of planting should be reduced to ensure that the path retains an open feel. The existing tree planting on the school boundary should be shown on the plan as this will indicate whether new trees are required. There should be an easement of at least 2 and preferably 3m to accommodate this existing PRoW.

The location of the Gas governor and SS at the northern extent of this path on its junction with the new PRoW creates confined, unsupervised and unattractive spaces which have the potential to lead to antisocial behaviour. A barrier is required to prevent resident parking between these two structures.