

**From:** Planning Comments <planning.comments@braintree.gov.uk>  
**Sent:** 29 Oct 2024 04:22:21  
**To:** planning.idox.emails@braintree.gov.uk  
**Cc:**  
**Subject:** FW: 23/01994/FUL The Woodlands Hotel, Coupals Road, Sturmer, CB9 7UW (New 64-bed Care Home) - TPP & levels [FREETHS-ACTIVE.FID4632592]  
**Attachments:** 421\_PL\_00\_200\_REV\_R.pdf, 11119 Biodiversity Net Gain Report 04.10.24.pdf, Biodiversity Metric 3.1 auditing and accounting for biodiversity calculation tool - Macro Disabled (13.10.24).xlsx, Figure 2 BNG Habitat Proposed.pdf, 11119 Woodlands Village Green\_LMP REV C.pdf, OAS 22-187 AR01 Rev C Woodlands Hotel Haverhill.pdf, Figure 2 BNG Habitat Proposed.pdf

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**From:** Wallis, Carol <carol.wallis@braintree.gov.uk>  
**Sent:** 29 October 2024 4:17 PM  
**To:** Planning Comments <Planning.Comments@braintree.gov.uk>  
**Subject:** 23/01994/FUL The Woodlands Hotel, Coupals Road, Sturmer, CB9 7UW (New 64-bed Care Home) - TPP & levels [FREETHS-ACTIVE.FID4632592]

# What are the changes

Responses to BDC Ecology and BDC Landscape

## Revised Plans/Additional Information (This information will be used by Admin to supersede the relevant plans)

Application Number: 23/01994/FUL
Date Plans/Info Received: 25 Oct 2024
New Plan No(s): <ul style="list-style-type: none"><li>Village Green LANDSCAPE MANAGEMENT PLAN</li></ul>
Additional Plans/Information No(s): <ul style="list-style-type: none"><li>Email below (please redact all email addresses)</li><li>Holistic Design Strategy Coordination Plan – Drawing No. 421_PL_00_200 Rev. R</li><li>Biodiversity Net Gain Report</li><li>Biodiversity Metric 3.1</li><li>Figure 2 Proposed BNG Habitats</li></ul>
Superseded Plan No(s): <ul style="list-style-type: none"><li>LANDSCAPE MANAGEMENT PLAN</li></ul>
Plans/Additional Information need printing? No thanks

## Alter description of development

New Description:
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## Neighbour Notification

To Objectors:	
To Occupiers:	
Parish Council:	14 days
None:	

## Consultations

Selected – Please re-consult BDC Landscape and BDC Ecology for 7 days
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## Other

Red Line Altered:No
New/Additional Site Notice Required: No
New Drawings to be Idoxed: yes please (+ redacted email below)
<b>Superseded Drawings Altered on Idox:</b>
<b>Drawings entered and updated Plans on Uniform:</b>

Many thanks,  
Carol

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**From:** Beth Evans <[REDACTED]>  
**Sent:** 25 October 2024 15:00  
**To:** Wallis, Carol [REDACTED]  
**Cc:** Mark Bassett [REDACTED]  
**Subject:** RE: CONSULTATION REMINDER: 23/01994/FUL The Woodlands Hotel, Coupals Road, Sturmer, CB9 7UW (New 64-bed Care Home) - TPP & levels [FREETHS-ACTIVE.FID4632592]

Carol,

Further to recent correspondence, we set out below a response to the Landscape Officer's comments and also the Ecology Officer's comments which you circulated separately.

## Landscaping

It is noted that the Officer accepts that the proposed planting is appropriate and 'commensurate' to the loss, and that the trees to be removed are generally of a low size/quality. It remains our firm view that the proposed planting is a significant gain in arboricultural terms (as noted previously, there will be 424no. woodland scrubs planted, 53no. individual trees and 10no. fruit trees), and tree loss has been minimised as much as possible (noting that a viable care home can't be achieved without some tree removal).

The Officer goes on to state *"Ideally, plans would also illustrate the ultimate special requirements of the trees to show that the planting is sustainable through future growth, and would also include a design statement setting out justification for species choice in relation to site characteristics and design objectives. There is no detailed planting work specification, or plan of aftercare."* The first element of this sentence is considered an unreasonable request – the Officer has confirmed that the proposed planting is appropriate, and has not raised concerns in this regard – in addition, there is no policy requirement to justify the species choice.

The detailed specification, and long-term maintenance can be readily secured by condition (including the detailed construction of the green roof), as is widely accepted by LPA's across the country. Indeed, it is well established that it is unreasonable behaviour for planning permission to be refused for something which is capable of being dealt with by condition (as reflected in the PPG).

In respect of the other landscaping queries, an updated Arboricultural Statement is attached which now includes the Tree Protection Plan. Please note this drawing will be used to inform an Arboricultural Method Statement, and again, the approach would be to provide this via condition (as is standard practice).

In terms of site levels, the proposed development has been designed in 3D Revit software and a Topographical survey of existing levels has been used to ensure the proposed levels follow the existing topography of the site as far as possible. The attached Holistic Design Strategy Coordination Plan (421/PL/00/200 Rev R) shows the existing and proposed levels around the relevant areas of the car park – the area that will require excavating is also shown for completeness.

As can be seen, the whole area of the front car parking and vehicle access generally follows the existing levels, including around Tree T23, with only slight variations between existing and proposed levels due to smoothing out of the car park surface. The design and methodology to the surfacing etc. will be further developed with a civil engineer and arboricultural consultant in order to ensure excavation is minimised and there is appropriate protection of root protection areas – again, this would be covered in the Arboricultural Method Statement (to be conditioned).

The attached plan also highlights the areas of soft and hard landscaping which overlap with the RPAs (pink), and where levelling of the ground is required (yellow) for the external ramps and rear car parking. As can be seen, there is no significant encroachment on any RPAs.

Overall, it is therefore our position that the submitted information is comprehensive and exhaustive for what should be required to determine the planning application. The proposed development is acceptable in landscaping and arboricultural terms and appropriate conditions can be imposed to secure the landscaping and arboricultural mitigation.

## Ecology

As requested by the Ecology Officer, please find attached an updated Biodiversity Net Gain Assessment, metric and Proposed BNG Habitat Plan which now reflects the revised landscaping scheme (as previously submitted). The revised landscaping scheme / revised footpath routing around Tree T18 has had a negligible effect to the overall score.

The main difference to the score is as a result of changing the baseline condition of the other neutral grassland from 'moderate' to 'poor' (as also requested by the Ecology Officer). This change means there is now a substantial gain onsite of 60.48% habitat units (compared to 40.11% previously).

Nevertheless despite this significant on-site gain, in order to satisfy the trading rules, the Village Green land is still proposed to be provided as 'off-site' habitat (as shown in Figure 2 attached). As such, the proposed development is acceptable in ecology/BNG terms, and provides a significant betterment over and above 10%. This is a significant benefit, particularly because there is no adopted planning policy dealing with Mandatory BNG and the application was submitted in July 2023 prior to Mandatory BNG being required.

While the Ecology Officer accepts that much of the requested information with respect to landscape management could be secured via condition, through an Landscape and Ecological Management Plan, the already submitted version (in relation to the Village Green) has been updated to provide some further clarity at this stage (see Rev C version attached). The is covered in Tables 3 and 4. Any further detailed information required, including a Landscape and Ecological Management for the application site itself, could reasonably be dealt with via condition (as the Officer accepts).

Overall, it is therefore our position that the submitted information is acceptable, and the proposed development is acceptable in ecological terms.

I hope you would agree that we have been very co-operative to requests for additional information on these matters, many of which we consider could have been dealt with by condition. Nevertheless we recognise the importance of satisfactorily resolving these issues and would politely request that the application proceed to Planning Committee at the earliest opportunity.

As mentioned in my earlier email this week, we will come back to you separately on title details for any S106 Agreement.

Kind regards  
Beth

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**From:** Wallis, Carol [REDACTED]  
**Sent:** Thursday, October 10, 2024 12:36 PM  
**To:** Mark Bassett <[REDACTED]>  
**Cc:** Beth Evans <[REDACTED]>  
**Subject:** FW: CONSULTATION REMINDER: 23/01994/FUL The Woodlands Hotel, Coupals Road, Sturmer, CB9 7UW (New 64-bed Care Home) - TPP & levels

Dear Mark,

Please see the following comments from our Landscape Team:

Following previous comments, further information has been provided, including a revised Arboricultural Impact Assessment dated Sept 24, although still titled Rev B, and significant additional landscaping detail.

The revised AIA provides further information on the level of tree removal, with total losses, including trees within groups at 49 stems. The AIA also shows that minor layout changes have been incorporated to reduce previous RPA encroachment of concern, e.g T18 is now unaffected.

It also appears that the plan for parking adjacent trees has changed, for example T23 still has significant RPA encroachment, but this parking is now shown as “porous” on supporting drawings although there is little information on what this means, the AIA itself states that this area will be “no-dig” there remains no discussion of site levels.

There is no longer a Tree Protection Plan included with the drawing.

The supporting landscaping information now includes a detailed planting layout for the whole site, which includes a varied species palate and broadly demonstrates that the planting is at appropriate spacing densities. Ideally, plans would also illustrate the ultimate special requirements of the trees to show that the planting is sustainable through future growth, and would also include a design statement setting out justification for species choice in relation to site characteristics and design objectives. There is no detailed planting work specification, or plan of aftercare.

The landscape plan includes details of the wildflower mix proposed for the biodiverse roof, but states that details of construction are provided elsewhere.

There remains little information on the proposed management works within the woodland area, some indicative informal paths are shown, and are described as being potentially “no dig” or “compacted earth”, but nothing that would constitute a management plan.

**Conclusion**

The cumulative impacts to trees remain significant. There is substantial loss of trees, both individual and within groups, albeit largely of low size and quality.  
Impacts to retained trees appear improved, but there is insufficient information to fully allay concerns.  
Detail on new planting is substantially increased, and broadly demonstrates that new planting is feasible and likely to offer commensurate value to those removed, but further detail is still outstanding.  
Similarly, there remains a lack of detail to demonstrate that a biodiverse roof is likely to be successful.

Officers acknowledged that the level of information provided has improved. However, at this stage further detail on level changes and a preliminary Tree Protection Plan would be required to show that concerns regarding working room and the feasibility of mitigation have been addressed.

Please also provide a land ownership plan and the relevant title documents for land within the application site (red) boundary, and all other land required for access, planting etc. that need to be included in a potential S106 agreement.

Regards,  
Carol  
**Mrs. Carol Wallis**

**Senior Planner, Development Management**

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My working days are Tuesday to Friday



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