

Review of landscape elements

Purpose of note

To provide a professional review of the landscape elements of the proposal by Miller Homes to build 350 houses on land off Shurdington Road in Cheltenham. The note can then inform the determination of the planning application by Cheltenham Borough Council (CBC) as they consider the proposals against the landscape planning policies. It is also prepared to assist in forming any subsequent planning conditions that CBC may choose to apply should they grant consent. Where a planning condition is suggested the corresponding text is highlighted in blue.

Author of note

The note has been prepared by Stuart Ryder of Ryder Landscape Consultants who from time to time assists CBC in landscape matters at sensitive locations within the borough. He has appeared as Expert Witness at three Planning Inquiries concerning land at Leckhampton including the Site under consideration.

Scope of note

The note considers the landscape elements of the applicable planning documents presented by Miller Homes as the Applicant of this Full Planning Application. The documents reviewed are set below in table format.

Ref	Documents considered
1	Planning Statement - specifically references to Landscape and GI Strategy matters.
2	Landscape and Visual Appraisal – specifically Review Tables for landscape receptors and visual receptors and consider if assessment is fair and/or influenced design proposals
3	Design and Access Strategy - specifically Chapters 7 & 8
4	Surface Water Drainage Strategy – Plan only
5	Ecological Assessment - specifically Figure 1 Ecological Proposals Plan to ensure matters listed are included in landscape proposals
6	Enclosure Plans for north & south areas to comment on boundaries proposed and location on plans.
7	Mitigation design - for landscape proposals to address adverse landscape and visual effects.
8	Green Infrastructure Strategy – including review of proposed planting species
9	Tree survey and Arboricultural Impact Assessment – to understand effects on the Site's landscape character and the Site's contextual area

1 Planning Statement

The Planning Statement as prepared by the RPS Group has revision letter V2, status as Final and is dated 7 October 2020.

The Planning Statement acting as a summary for many other, more detailed reports was consulted first to define relevant areas of landscape interest.

The following points of note were identified in the Planning Statement review, where applicable cross referencing with other Application documents is given;

From the Executive Summary

- Page 5 – Footpath and cycleway reference linking east and west portions of the proposals – check in Transport Study that the route is sufficiently wide and safe to use for both pedestrians and cyclists.
- Page 5 – How were the desire lines to and from school decided? – Again reference to Transport Study would be useful.
- Page 8 – Last bullet – reference is made to formal recreation by this it is understood that it means play areas rather than any other facility? A kick-about area is referenced later at §7.14 and in the LVA.
- Page 10 – A statement is presented that ‘*A scheme will be secured for Open Space Maintenance*’, careful agreement will be required for this element and consideration at the same time as detailed landscape / GI proposals are presented for discharge is recommended.

From the main body of the Planning Statement

- **§2.6 – Tree retention** where possible will be reviewed with regards to the tree works plan with particular interest shown for amenity effects at boundaries and ability to retain high quality trees and hedgerows.
- **§3.4 – Inspector Moore’s opinion** on the view to Leckhampton Hill is presented to illustrate that changes to it are not determinative in this application, however it is a useful reminder that the Inspector thought that the view to Leckhampton Hill could be addressed in the detailed design proposals and this should be considered in the review of the frontage proposals to Shurdington Road.
- **§4.5 – Character Areas** – initial reaction to the four proposed areas includes whether the access to Kidnappers Lane properties has been explored as individual properties of the lane as per the opposite side of the road and why the School link starts where it does rather than at the turn of the spine road / Hatherley Brook.
- **§5 – Planning Policy Context** appears to be in order citing the appropriate Landscape and Green Infrastructure Policies (GI) from the Adopted JCS, Local Plan, Cotswolds AONB and SPG. However no SPG’s appear to be explored in the body of this section.
- **§5.55 & §5.56 – Cotswolds AONB Management Plan** – Acknowledgement is given that the proposals are in the setting of the AONB and compliance with the AONB’s management plan policies is also claimed. I would recommend liaison with the AONB’s Planning and Landscape Officer Mr John Mills to confirm they share this same opinion if you have not already approached them as a consultee.
- **§7.10 – Open Space figures** appear in excess of guide quantities, this is partly due to the inclusion of the Hatherley Brook corridor within the overall red line boundary rather than having two separate applications.

- **§7.14 – Kick-about area** – Siting and form of such facility needs to be considered when reviewing layout proposals as they can cause consternation to adjacent properties.
- **§7.18 – Allotments** – are part of GI proposals but hold limited landscape and ecological value as implied in this statement unless it is the overall GI that is being referenced as having landscape and ecological value.
- **§7.19 – SuDS Ponds** – educational value claimed and how this is to be delivered will require cross referencing in GI Strategy / Landscape Proposals.
- **§7.22 – Footpath CHL/6** – How would this be a rural footpath link, it is unlikely to have rural character but could still link out to a wider rural network. Of greater importance will be an appropriate surfacing and all year round usage.
- **§7.25 – Public Open Space** near to Merlin Way to benefit existing Leckhampton residents is noted and quality of link to ensure all year round access and usage will be important.
- **§8.14 – Small Holdings** – Cited in title of this section – confirm if any are to be retained and if so whether there are any agricultural tenancy rights conveyed by being classed as Small Holdings rather than as allotments.
- **§8.14 – Public Body** – to control allotments and community orchard, what happens if none are willing to adopt/own these public facilities? This is where a Landscape Maintenance and Management Plan is critical to confirm sustainable, long-term management arrangements.
- **§9.5 – Community Buildings** – last bullet in list makes reference to Community Buildings, what are these? Are they actually proposed?

2 Landscape and Visual Appraisal - LVA

Prepared by Hankinson Duckett Associates (HDA) and dated October 2020. The quality control check box would suggest the report has been written and approved for issue by the same person Brian Duckett a Director of the practice.

My review was restricted slightly by Appendix 1 – Methodology and other Appendices not being uploaded to the CBC Planning Portal but enough of the process was explained in the main body of the LVA to understand the process.

There are a number of anomalies in the main body of the report that should be brought to the Applicant's attention along with missing information that would improve the value of the LVA to the design and decision making process. Listed numerically these are;

- **§3.2.2 – Railway** - Reference to railway line is incorrect – there is none.
- **§4.1.5 – LDA Report** – No detailed analysis, this report was useful to the Inspector in the first Leckhampton Appeal
- **HDA Figure 4** – Does not clearly show where Character Areas CA1 to CA3 are.
- **§4.3.3 – Area CA1** - is assessed as having Low sensitivity but where is the justification for this judgement? Reference is also made to CA4 – is there 3 or 4 Character Areas discussed.
- **§5.1.1- Viewpoints** - Would have benefitted from re-confirming viewpoints with CBC.
- **Visibility** - Generally the level of visibility is discussed in photographs and mapping. When were the photographs taken? Is the level of visibility only to the open ground of the Site rather than where roofs and upper storeys may sit within the view?
- **§5.2.14 – Term 'limited'** - is used but what is the definition of this in the assessment methodology?
- **Cumulative assessment** - Where is the consideration of cumulative visual effects with the Bovis / Berry Nursery / School site?

- **§6.1.2 – Storeys** - Largely two storey with some three storey – where are the three storey houses going to be sited?
- **§6.2.3 – Informal kick-about area** - Need to check on details of informal kick-about area to confirm they do not clash with the community orchard.
- **§6.2.4 – Hatherley Brook proposals** - A lot is claimed for Hatherley Brook – is there sufficient space to do it all?
- **§6.2.7 – TPO615** - Use of native tree species and felling of Ash TPO615 for SuDS basin, could it be left on an island of raised ground or on a bank extension?
- **§6.2.8 – Play areas** – are they in a flood zone and will their siting have an impact on the wildlife value of Hatherley Brook?
- **§7.2.1 – Significant landscape features** - Makes reference to significant landscape features within the Site. What are they? A summary of them does not appear to be supplied in the baseline at 4.3.1.
- **§7.2.2 – Consultation** - Where or what was the earlier consultation with the CBC Landscape Architect?
- **§7.2.7 – Definition of Moderate for landscape receptors** - A Moderate impact on seven out of 30 landscape receptors. What is definition of Moderate – one is given under the earlier matrix but this makes reference to VR (presumed visual receptors) –is it the same for landscape receptors?
- **§7.3.2 – Reference to Character Area CA2** – Lott’s Meadow unchanged, will this be so into the future if planting in Moorend Meadow reduces?
- **§7.4.1 – The agreement of viewpoints** – does the Applicant have a record as I have not seen it.
- **§7.4.2 – Vistas** - have been created through the proposed development framing views of Cotswolds Escarpment to the south – where are they on the proposal plan?
- **§7.4.6 – Lott’s Meadow** - Again reassertion of no effect on Lott’s Meadow. But what happens if there is?
- **§7.4.9 – Kidnappers Lane hedgerow** – how is this substantial hedge going to be maintained? Needs to be addressed in a Landscape Maintenance and Management Plan (LMMP) or equivalent.
- **§7.5.1 – Confusing wording** - Do not understand the start of paragraph making reference to matters within the Site where other viewpoints are off the Site. Is the Moderate description the same as the one given on Page 21?
- **Cumulative Assessment** - Lacking in Cumulative Assessment with Bovis / Kidnappers Lane / School site.
- **§7.7.1 – Trees enhanced through additional management** – What is this? Where is it described? How can it be Conditioned?
- **§7.7.2 – Landscape features for enhancement** - Where is the list of nine landscape features to be enhanced?
- **§7.7.3 – Missing information** - x ha – please complete
- **§7.7.4 – Assertion** - Why does it ‘more than mitigate’ – no explanation or evidence given.
- **§7.7.5 & 7.7.6 – Missing** - or paragraph numbering error?
- **§7.7.7 – Some landscape features lost** – will the new habitat be of the same landscape features or different?
- **§7.8.2 – Character Area CA1** - (The Site) is considered to experience a **Minor** effect. No type of effect is stated e.g. Positive / Neutral / Negative. In reality when comparing the landscape

change between the baseline condition and the end state the effect is going to be larger and this needs to be taken into the Planning Balance.

- No reference to cumulative landscape effects on wider CA2 and CA3 character areas.
- **§7.9.1 – Minimising visibility** - It is stated that the proposed development has been designed to minimise its visibility but this statement is not explained or evidenced.
- **§7.9.2 – View to AONB retained through development** – where? How is this achieved? There is no visualisation to explain this or obvious gap on the plan.
- **§7.9.3 – Moorend Meadow footpath** - Would the additional footpath in Moorend Meadow have a rural character given its context to the north?
- **§7.9.7 – Visual amenity** - After 10 years it is considered as no more than Minor Adverse on the visual amenity of the area – it will remain greater than that when compared to the baseline particularly in views from Shurdington Road. This is something that has been taken into account at the Inquiry, the Local Plan EIP and designation of the Site for housing. The more telling question is do these proposals contribute to the best possible visual amenity associated with new development at this Site?
- **§7.10.1 – Cites compliance with Local Plan policies** – GE5 to GE7 of the Cheltenham Local Plan. These policies references do not exist. It could be referencing GI1 to GI3 but this does not cover off Policy L1 or any of the JCS Policies.
- **§7.10.5 – Minor Conclusion** - Where is narrative to explain conclusion of Minor? It is not at 7.9.2.
- **§6.7.3.2 – AONB and Visual Amenity** - Apart from paragraph numbering issue it describes views from AONB then mixed up with a conclusion on the ‘visual amenity of this area’.

Missing elements

I consider there to be the following gaps and under representation in the LVA;

- Clear description of landscape and visual mitigation.
- How the LVA process has influenced the layout of the proposals
- Cumulative assessments of the effects of the Bovis / Robert Hitchins / School developments.
- Clear narratives of overall effects conclusions.

The Landscape Institute now have an advice guidance note for reviewing LVIA and LVA’s and the Applicant’s may wish to use this to assess whether the submitted LVA could be updated to better advise CBC as they seek to determine the application.

3. Design and Access Statement (DAS)

Produced by the scheme architects Cooper Bailie Ltd it was Rev A of the DAS dated October 2020 that has been reviewed. Specifically Chapters 7 & 8 that address landscape and environmental matters. The DAS as often on larger applications is supported by a series of more detailed reports and is better classed as providing an overview.

§7.1 – HDA Landscape Strategy - Forward reference to HDA’s Landscape Strategy – this is Figure 7 of the LVA.

§7.4 – Moorend Meadow – considers already well drained but does not provide the evidence for this.

§7.6 – Proposals for Moorend Meadow – appear appropriate for setting and utilising some of this area’s existing landscape features. I would recommend additional large trees in the boundary

hedgerows to provide additional layers of screening between it and Lott's Meadow. Support the informal car park for the allotments but would also recommend that this is gated to restrict use to allotment holders.

§7.8 – Hatherley Brook proposals – it is described that a proportion is put over to SuDS features, what percentage of the central POS does this equate to? Hatherley Brook off plan reads more as green corridor rather than a versatile area of POS.

§7.13 LEAP – Appears well considered in principle but needs to be the subject of conditions addressing its overall size and number of pieces of the naturalistic play equipment suggested. Note in fourth bullet regarding the Disability Discrimination Act is inaccurate as it has been replaced by The Equality Act 2010.

§7.14 – LAP'S – suggests that there will be limited formal play equipment for these areas but some will still be required and should be conditioned along with the LEAP's. Both types of play areas need specific consideration in the site wide Landscape Maintenance and Management Plan (LMMP) including safety inspection regimes.

§8.4 – Open Space Totals – are given at 4.362 Ha / 10.778 acres including hedgerow widths. This equates to 38.2% as Green Infrastructure. It would be interesting to see a figure for open ground that is accessible and useable by new and existing residents rather than SuDS basins / streams / hedges/etc.

4 Surface Water Drainage Strategy

Produced by Patrick Parsons and dated 8/10/20 I reviewed the Site Wide Drainage Strategy drawing B17427-PPL-500 Rev P3.

The review did not address any of the engineering design or flow calculations but rather considered the proposals 'fit' with the proposed treatment of the site's external realm.

- **Proposals overview** – Logical to use the two existing surface water features on Site – Hatherley Brook and Moorend Brook to discharge surface water run-off to.
- **The unnamed brook (LECK3)** -is I believe the watercourse Moorend Brook named in the LVA.
- **Three attenuation ponds** - The two brooks are aided in managing large pluvial events by three attenuation ponds again set logically to the downstream end of the watercourses where they can gather and detain the greatest volume of surface water run-off.
- **Wet or dry?** - Clarification on whether these ponds are to be kept in the wet or dry is recommended. Other documents do state they will be kept as wet ponds, if it is wet what depth of water is anticipated outside of flood conditions?
- **Uniform side slopes** - It is also recommended that the ponds do not have a uniform 1:4 side slope as this will increase their appearance as artificial features on the Site. Varying the side slopes will add visual amenity and increase their value for wildlife. Varying slopes between 1:4 and 1:8 is suggested.
- **Pond planting** - Planting of these ponds is required and should be conditioned along with the establishment maintenance and subsequent aftercare of the ponds. They should form a distinct part of the Landscape Maintenance and Management Plan.
- **Pond ancillary features** - It is also recommended that the ancillary features to the ponds such as the proposed stilling basins (rock armouring hatch indicated), headwalls, water level controls and any protective fencing are also conditioned on the grounds of ensuring positive visual amenity.

- **Bovis site** - From the plan it is unclear whether surface water is being discharged straight from the Bovis site to this one or how (if any) interaction with this scheme takes place.
- **Daylighting pond discharges** - Can the discharges from the three ponds to the two watercourse be made in day-lighted channels with weir points rather than drains and chambers to aid wildlife movement?
- **Landscape areas** - The solid red and green hatches on the plan are summarised as Public Open Space/Allotments/Soft landscaping – Not positively drained (also stated in Assumption Notes). However these facilities could require some field drainage to facilitate full seasonal use and an outflow from them should be considered in the overall layout. To evidence this I would direct the Applicant to consider the state of nearby Lott's Meadow in winter conditions and general soil conditions. What does any infiltration testing show?
- **Existing field drains** - On the same subject of field drains have any existing field drainage surveys been undertaken in the area of the three attenuation ponds as given the site's former use as a market garden there may be a historical field drain network in existence. Field drains left in the ground in the vicinity of the ponds may affect their ability to hold water or manage it as designed in a flood event.
- **Environment Agency approval** - Finally the key states that for the 1:100 and 1:1000 year events the JBA modelling has been approved by the Environment Agency – has the methodology and or model outputs been approved or rather accepted?

5 Ecological Assessment

Prepared by Hankinson Duckett Associates (HDA) the submitted Ecological Assessment is at Revision A and dated October 2020.

The only sections reviewed are the Conclusions and the Ecological Proposals Plan.

- **§6.1 – Chiltern Beechwood SAC** – Mis-naming of local Beechwood SAC as Chilterns SAC rather than Cotswold Beechwood SAC, accurately named elsewhere in report.
- **§6.2 – Hatherley Brook and Woodland** - Has recreation pressure on Hatherley Brook been taken into account especially as protected species homes are located there. Also reference made to associated woodland , where is this woodland as it is not on Site?
- **§6.3 – Section 5 proposals** – this third paragraph makes back reference to Section 5 which lists the ecological proposals that 'subject to securing these measures' will mean the site can be maintained and potentially enhanced for wildlife. A list of suggested conditions is provided at 5.15 that could be applied to assist delivery of the ecological works. These include and a Landscape and Environmental Management Plan (LEMP).
- **§6.4 – Designated areas** – is this reference to off-site designations such as the Cotswold Beechwood SAC as there are none on Site.

Ecological Proposals Plan

- The position of the protected species is noted and accords with retained green space.
- New feature trees near to Pond C – are these for ecological or landscape benefit?
- Use of nectar and pollen rich plants with formal planting points to rear gardens in a residential area – should CBC be expected to receive proposals plans for these areas or condition such garden planting?
- Management of Moorend Meadow is cited but not explained.
- How many bat roosts and bird boxes are proposed on trees and new buildings? – Perhaps condition a percentage or all properties facing the brook corridors and site boundaries.

- Gaps in hedgerows to be filled with native stock of local provenance but who manages, cuts, lays, beats up and when do these activities take place – another topic for the LEMP.

6 Enclosure plans

There are three enclosure plans submitted all prepared by scheme architects Cooper Baillie with latest revisions dated September 2020;

- CB 70_064_009 Rev D – Scheme wide enclosure plan
- CB 70_094_109 Rev D – North enclosure plan
- CB 70_094_309 Rev B – South enclosure plan

Each plan depicts where the four types of proposed enclosure are to be set through the use of co-ordinated coloured lines.

Enclosure typology comments

Red Line – Brick column and close boarded timber fences

Usage – Publicly visible side and rear garden enclosures. This appears appropriate for such locations.

Details – Brick types should match associated housing brick. The boarding should be a more substantial board rather than feather edge with a straight, planed edge to give a higher quality effect.

Turquoise Line – Larch lap fence panels with timber post

Usage – Demarcation of rear garden boundaries. This appears appropriate for such use and locations.

Details – A cheaper fencing type that is prone to post rotting and subsequent wind damage, likely to be changed to concrete posts and panels within 8 to 12 years by individual property owners. No indication of whether higher 1800mm panels are to be used along whole length of garden or just as ‘modesty’ panels next to the homes and then stepping down to 1200mm panels so rear gardens do not appear as ‘hemmed-in’ by entirety of tall panels.

Blue line – 1800mm close board fence

Usage – Either side of rear access routes. Suggestion for modifications given below.

Details – Timber posts are likely to rot leading to partial fence collapse so concrete posts and gravel boards should be considered for these routes. Such fencing does not look as sympathetic as entire timber fences but it is easier to replace panels which will be critical if these are access routes. The gravel board can be retained in baulk timber to lessen the amount of visible concrete or possibly substituted to a plain concrete gravel board.

Yellow Line – 1200mm estate rail

Usage – Minimum usage at entrances to shared parking courts and areas. Appropriate subject to suggested modifications below.

Details – The estate rail shown has too large a gap at its bottom and does not look like any traditional estate rail fence because of this and the limited number of rails. The curved corner instead of finishing at a straight end post does not add to a sense of authenticity. Recommend at least another bottom rail and straight posts throughout. No reference to finish / paint colour(s).

Overall the type of enclosures appear appropriate but I would still recommend a condition to ensure that their actual finishing detail is to an agreed quality of finish.

Fencing usage on plans

The following comments address where the fencing is and is not used around the proposals.

- There is a distinctive lack of fencing to Shurdington Road where the Estate fencing could improve the appearance of the road corridor and development if placed to define the SuDS pond area at the end of the Hatherley Brook corridor. Note it is not suggested to surround all the pond(s).
- Likewise Estate fencing could assist in better creating a semi-defensible frontage to the properties to the western end of Shurdington Road where only a hedge is indicated on the enclosure plans.
- Estate fencing would assist in controlling vehicular access to the SuDS Pond A from the eastern road where currently it appears open on the enclosure plan.
- Again vehicular control is required to prevent general use of the emergency link between the two halves of the proposals.
- In the same area of the vehicular link fencing control at the bridge / culvert over Hatherley Brook is required.
- No fencing is shown at the current SuDS Ponds headwalls – are they small enough not to require it?
- Western cycle path near to current Kidnappers Lane position requires vehicle control to restrict unlawful use.

I have included the external realm remarks here as the external realm boundaries and enclosure is not addressed fully in the landscape or GI proposals.

7 Landscape Strategy

Based upon Illustrative Landscape Strategy 436.16/101C dated September 2020 prepared by Hankinson Duckett Associates (HDA).

In addition the Land Use Plan and Hard Surfacing Plan prepared by Cooper Baillie have also been reviewed.

Landscape Strategy

Is a single plan with 11 points keyed onto the overall drawing. These 11 points are reviewed below with further comments on potentially omitted items discussed after that.

1 – LAP's – locations of LAP's shall provide for some natural play opportunities but miss out on natural supervision as indicated. Possibly keep open to path or housing sides and not enclosed by planting. 3 No. LAP's are shown on the landscape strategy.

2 – Merlin Way path link – is a good idea to allow existing residents access but not in an unbound surface as it will be popular requiring a surface finish that can be used all year round. Recommend either coloured tarmac or resin bound aggregate but not bound gravel or Hoggin that would not withstand the anticipated usage.

3 – Junior Footpath Pitch – referred to in other documents as informal kick about area. If it is to be a more formal pitch who pays for its formation and management? It would also extend the urban form of the proposals out towards Lott's Meadow.

4 – Enhanced planting – one objective of this planting and on the other side of Moorend Meadow is to continue to provide the layers of vegetation that gives screening to views from Lott’s Meadow. This should be stated somewhere and the species chosen accordingly.

5 – Mown grass paths - but mown by whom?

6 – Community orchard to retain some of the old fruit trees – but managed by whom? Who sets up any community groups? Do they need a small base and set up equipment, possibly associated with new allotments?

7 – Allotment car park – good idea as people will drive to these features with tools. As suggested earlier should be gated to restrict use to allotment holders. Car park surface could be Hoggin given frequency of use and desire for permeability.

8 – Allotments – Have these allotments been discussed with CBC’s Allotment Officer? Are they going to be hedged or fenced to provide a degree of security? Will they have a mains water supply?

9 – Woodland belt – This is not a woodland belt but is minor screen planting at the southern corner of the proposals to give Robinswood Cottage some separation. The effectiveness of this can only be judged when detail design is provided in terms of species choices and treatment of the existing boundary hedgerow.

10 – Focal area – For what? It appears to have little detail on the proposal plans.

11 – LEAP – Appears sensibly located central to the two halves of development. Enclosure through fencing is required taking account of anti-bullying and dog stop measures. Appropriate fall from height surfacing will also be required.

Landscape matters not clear at this moment in time

The following matters appear not to have been addressed in the Illustrative Landscape Strategy.

1. The treatment of the Shurdington Road corridor so a positive image of the development can be presented and a key route into Cheltenham kept attractive.
2. The creation of some form of entrance character other than the highway geometry of the entrance roundabout.
3. There is limited tree planting within the estate. This is particularly important given the lack of front gardens or size of front gardens effectively preventing any garden planting. The street trees as shown require space to succeed and a careful design and installation to provide adequate soil volumes for growth, water / drainage balance / permeable surfacing / vehicle protection. I would recommend a specific condition requiring full details of street tree planting are submitted at the same time as the highway proposals. Within the Landscape and Environmental Management Plan (LEMP) their establishment care and aftercare should be explicitly stated. The success of their establishment should be reported on annually and replacement of failed stock also take place annually.
4. Given the lack of green space to the front of properties tree planting should be provided in the rear gardens to provide some shade / transpiration and general visual amenity benefit.
5. Benches are indicated in some communal areas. These and all other street furniture that are not included in the proposals should be conditioned and details of such things as benches’ hard standing, maintenance access for emptying bins / dog bins, vehicle gates and barriers shall be supplied along with a maintenance strategy.

6. The view to Leckhampton Hill from Shurdington Road does not appear to have informed the landscape response or the wider layout of the proposals. Could the applicant be asked to explain how they have addressed this matter?
7. Lack of landscape maintenance and management details whether in the form of a specific Landscape Maintenance and Management Plan (LMMP) or included in a combined Landscape and Environmental Management Plan (LEMP). This should be conditioned and be submitted at the same time as the detailed landscape proposals as pre-commencement conditions.

Hard Surfacing Plan

Produced by Cooper Baillie the Hard Surfacing Plan reviewed was CB_70_064_010 Rev D dated 24/9/20.

The review concentrated more on the types of surfacing proposed rather than the proposed locations that appeared appropriate.

- **Focal tarmac** – What is meant by this? Coloured? Chippings? Imprinted asphalt? It appears to be used for one road and the raised speed islands. Ease of future repair and patching – aim to keep services out of these areas.
- **Hoggin** – As stated above the use of Hoggin for path surfacing is not recommended in this location given the anticipated high footfall and need for clean all year round access. Please can the Applicant suggest alternative and bound surfaces.
- **Surfacing in LEAP's & LAP's** – unclear what is proposed but safety surfacing is required to suit the proposed play equipment.
- **Other surfacing types** – considered appropriate subject to final choices and designs to suit permeability and SuDS proposals.
- **Footpath CH6/L** – what is proposed for this footpath where it runs through and adjacent to the development?

It is recommended that a hard surfacing condition is applied to the proposals that addresses these points and ensures the proposals meet with all necessary highway design standards.

8 Green Infrastructure Strategy

Prepared by Hankinson Duckett Associates (HDA) and dated September 2020 this document does not appear to have a specific reference number to cite.

§1.4 – Last line Outline Management Plan – Why would only an Outline Management Plan be produced when a full one is required?

§4.1.3 & §4.1.5 – Local Green Space – has now been designated so text is out of date.

§4.1.6 – Hatherley Brook and Moorend Stream – are not prominent features as stated, their corridors with associated riparian trees are more prominent but again not at a grand, prominent scale. They are however the most significant GI that the site displays.

§4.1.10 – Green Shurdington Road corridor – new hedge and associated trees are proposed but no comment on scale of planting – frontage is appropriate for advanced hedging stock for instant effects.

§4.1.11 – Kidnappers Lane Hedgerows – retained but no management mentioned – currently large and unmanaged.

§4.1.7 – Finer Grain Open Space – Incorrect paragraph number. Reference is made to features of high landscape / ecological value – where is a clear list of such features to retain? (LVA/Ecological Assessment/Tree Survey). I would recommend a plan to clearly locate and define these elements to save later confusion / argument.

§4.1.13 – Significant Open Space - Why is it referred to as a ‘Significant’ area of open space? What is the definition of significant?

§4.1.14 – Plural LEAP’s reference – assume this is incorrect as just one on the plan. Plan key for play areas is confusing both symbol wise and by reference to NEAP’s which is again considered inaccurate.

Section 4.2 - provides greater details on the characteristics of the different areas on the development.

Figure 7 – Green Infrastructure Opportunities

This plan is basically the landscape plan marked up with six narrative boxes. The more fundamental point is are these ‘opportunities’ i.e. they could happen or ‘proposals’ that planning consent is being sought meaning they will happen and should be taken into consideration when the quality of the external realm is being considered?

Taking the six boxes from top to bottom on the sheet the following comments are made;

- **Box 1 – SuDS Pond Area** – Wrong reference to LEAP as this area is shown as a LAP throughout;
- **Box 2 – Shurdington Road Edge** – proposals appear to be replace one hedge with another with some additional standard trees. It will appear similar to existing. What is? And Where is the new urban open space?
- **Box 3 – Existing CHL6 Footpath** – hedgerows to have gaps filled but would benefit from systematic phased laying and hedge standard trees to help create layers of vegetation to restrict views from Lott’s Meadow.
- **Box 4 – Generic SuDS Box comments** – Indicative section only, no section line on plan – first mention of use of gabions near watercourses / swales – preference would be for corridors to be wide enough not to require gabion retention.
- **Box 5 – New avenues and tree lines** – critical given density of housing and lack of front garden space. Some do not appear to be in wide enough planting areas on detailed plans. Please see previous comments about planting in rear gardens to increase benefit of tree planting.
- **Box 6 – Kidnappers Lane Important Hedgerow** – What are the ‘enhancements’ as necessary? Its Important status is not referenced in the Tree Survey.

Figure 8 – Ecological Proposals Plan

- No different to Ecological Proposals Plan reviewed above at 5 but with one additional comment which references Japanese Knotweed on site. As a notifiable pest species this will require removal to Environment Agency standards and I would recommend that its certified removal is made the subject to a pre-commencement condition.

Detailed proposals

- **§4.3.1 – Moored Meadow** – Meadow Grass v Kick-about area, these are mutually exclusive as you need shorter amenity grass for informal kick-about games. Doing so on longer

meadow grass will denude its floristic and ecological value. It should be one thing or the other or an area of amenity grass be formed for informal ball games.

- **§4.3.1 – CHL6 retention** - The retention of CHL6 is a given as no application to extinguish or divert this footpath appears to have been made.
- **§4.3.1 – Education Interpretation Boards** – stated ‘could’ be installed, is this a definite proposal and if so how many?
- **Figure 14 – Moorend Meadow** - does not really add any more detail to the other drawings but does show the path from Merlin Way running to the south of the proposed allotments. Public access along here will not be appreciated by the allotment holders and should be avoided.
- **§4.3.1** – Second use as paragraph reference and missing data on tree and hazel stools.
- **Figure 15 – Allotments** - Not adding any further detail – what is the boxed cross symbol meant to be proposing under the No.2 annotation? Is it a retained or proposed structure?
- **Orchard precedent sheet** – Local orchard tree varieties are a good idea but are the cited varieties available?
- **§4.6.1 – Walking times** - How does play within 15 minutes’ walk compare to the open space strategy? 15 minutes’ walk is perhaps a little too long with the development not that big to require this large walking time.
- **§4.6.2 – Play area criteria** –Incorrect reference to Disability Discrimination Act.
- **§4.7 – Public realm** – two key areas on estate but neither are overly large or characterful.
- **Location A: Point 4** – view to Leckhampton Hill down a side street rather than as a major focus on the estate.
- **Location B: Point 2** – Combined cycleway / footpath is listed as 3.0m should be 3.5m what are the Sustrans / Gloucestershire CC details that will be followed?
- **Location B: Point 7** – View to Leckhampton Hill not framed by proposed tree lines but more likely obscured.
- **General comment on coloured cross sections** – it is recognised that the sections are illustrative and presented to show the spatial order between elements. However this is a Full Planning Application and to assess if there is sufficient space / width for the features shown proper scaled sections and section lines on a scaled plan should be provided.
- **Section 5 – Generic planting lists** – No objections in principle to the plant species listed but would like to see them laid out on a detailed planting plan. This will no doubt form a planning condition. The other point noted is the suggestion of alder (*Alnus glutinosa*) along the watercourses and further checks are required that Alder Root Disease is not prevalent in the area.
- **Street trees and parking** – Shrubs & lawn areas to front gardens are largely missing from these proposals but listed in the items.

Missing elements

The following two items are missing from the information presented in the Green Infrastructure Strategy;

- Amenity grass area for informal play rather than proposing meadow grass throughout.
- Any detailed reference to how the areas are to be managed e.g. LMMP or LEMP.

9 Tree Survey and Arboricultural Impact Assessment (AIA)

Prepared by Hankinson Duckett Associates (HDA) and dated October 2020 this document does has reference number HDA ref 43.6.17 Issue 01.

It reports on the first two stages of tree and hedge management with regards to construction projects – Tree Survey Information and Arboricultural Impact Assessment. It does not report on Arboricultural Method Statements (AMS) which are required to manage site matters during construction.

- **§1.4.1 Tree Survey Date** – February 2020 was the survey date.
- **§2.3.1 Survey Caveat** – Explains that the survey is not a Tree Safety Survey.
- **§2.3.4 Manual tree plotting** – Explains that five individual trees and three tree groups were plotted manually as they were not identified on the topographic survey. The listed stock have been reviewed on the tree felling and retention plan and none are in ‘borderline’ situations where the accuracy of plan positioning is paramount.
- **§3.4.1 – Soils** – impeded drainage is a general characteristic of the soil which is why Moorend Meadow may require further investigation to prove lack of drainage problems before it is used as the development most open piece of public space.
- **Table 1** – Survey category numbers – useful summary of numbers under each category of survey.
- **§4.3.2 – Category A tree** – singular, just one oak tree on Hatherley Brook which will not be distinct from other riparian trees along the watercourse.
- **§4.3.3 – Category B trees** – 58 trees, 37 groups, 17 hedgerows equating to 2/3rds of surveyed stock.
- **§4.3.4 – Category C trees** - 13 trees, 26 groups, 13 hedgerows equating to 1/3rds of surveyed stock.
- **§4.3.5 – Category U trees** - 2 trees, 1 group.
- **§4.4.1 – TPO** - Identifies the one TPO (CBC Ref No.615) on site which is a group of six trees including the frequently reported ash tree T31 which is proposed for felling to assist in forming SuDS Pond C. Please see my comments on the Tree Removal Plan below.
- **§4.5.1 – Active Management** – Identifies the need to restore active management and this should be a key plank of the LMMP or LEMP.
- **§4.5.2 – Willows on site** – previously coppiced or pollarded and recommendation to re-establish this as a management technique. Again LMMP / LEMP inclusion required.
- **§4.5.3 – Fruit trees** – considered old and not viable for cropping. This would need to be managed within the detailed community orchard proposals particularly as they are key part of those proposals.
- **§4.5.4 – Ash Die-back Disease** – Strategy is to keep on site rather than immediately fell tree displaying symptoms as some may tolerate the disease. Requirement for ongoing Tree Safety Surveys for those in public areas.
- **§4.5.5 – Conifer plantation** – agree its removal makes sense.
- **§5.1.2 – Detail design evolution** – Survey identifies requirement to review Arboricultural Impact Assessment after finalisation of detail design proposals. This could be conditioned along with requirement for Arboricultural Method Statements (AMS) for works in root protection areas (RPAs) amongst other matters.
- **§5.2.1 – Felling numbers** – 26 trees, 27 groups, 12 hedges and 1 plantation to be removed.
- **§5.2.2 – Category C’s and U’s** - Over half of above are C’s or U’s but how many are B’s?

- **§5.2.3 – T31 Ash tree** – This TPO tree should be judged on its contribution to amenity. Its health condition has not been fully surveyed due to bramble growth.
- **§5.3.6 – Pollarding** – The pollarding of trees along Hatherley Brook is a positive management activity for landscape and ecology reasons. It is not strictly needed to provide construction space but should be included in the works over a phased three year process.
- **§5.4.1 – Foundation implications** – believed to be missing the word None in this paragraph.
- **§5.5.1 – Ground level changes** – recommend check with finalisation of proposals, again include in AMS condition.
- **§5.6.2 – Ash (T23) Root Protection Area (RPA)** – is over 20% disturbed but Hoggin path is proposed. However Hoggin path surfacing is recommended for change so proposal of another type of porous surface is required.
- **§5.6.4 – Crack Willow RPA (T66)** – Hoggin change as above.
- **§5.7.1 – Underground Services & Drainage** – include within AMS condition.
- **§5.8.1 – Overground Services** – include within AMS condition.
- **§5.11.1 – Implications of Construction Activities** – appear consistent and works should be delivered in accordance with these points.
- **§5.11.2 – Tree Protection Fencing** – ‘outline’ indication must be firmed up pre-construction – again include within AMS condition.
- **Tree Survey Plan** – Clear and locates stock on site.
- **Tree Survey Tables** – Again clear and well laid out.
- **T26/G30/H17 & H18 – Remove spoil** – Ecological assessment is recommended to confirm absence of herptofauna prior to the removal.

Hedge Survey and Management Plan – There is no illustrated hedge survey /management plan where one would be useful. For example H10 is considered Important under the Hedgerow Regulations but not mentioned in the survey tables. It could become the baseline condition for future management of hedgerows on site. Looking at the tree works plan it appears that all hedgerows are being kept out of individual plot ownership which is a positive management step but who manages them going forward? and how they are to be managed? still needs to be established and agreed prior to commencement of works.

Tree Removal Plan

TPO ash tree T31 – could be retained with the manipulation of SuDS Pond C shape setting it further to the west to keep the tree on the east bank. However I would not recommend this as the resulting loss of open space to the west of the pond is greater in aesthetic and use terms than the value gained by retaining the TPO ash tree T31. It would be useful to see photographs of the tree to confirm the amount of amenity value it has and this opinion should be tested with CBC’s Arboricultural Officer.

Do not disagree with any of the specific tree removal recommendations as illustrated for this layout to be built.

Appendix E – Tree Protection Plan

Success depends on the management of tree fencing, RPA’s and no dig zones on site and more detail should be supplied to discharge an AMS Condition. The proposed tree protection lines appear reasonable but some lack build outs around individual trees such as T9/T66/G44. A question regarding the feasibility of fencing around the Pear trees of G8 and maintaining sufficient construction space is also asked.