

MEMORANDUM

From:	Brigitte Crafer Landscape Architect	To (Case Officer):	Kieran Neumann
Service	WBC Landscape and Trees	App No:	242665 – Rev. A
Address:	Land west of Kingfisher Grove, Three Mile Cross.		
Type of Development:	Major Dwellings (10+)		
Proposal:	Application for approval of Reserved Matters pursuant to Outline Planning Consent 201002 (approved under appeal ref. APP/X0360/W/22/3304042 dated 31/01/2023) for the erection of 49 no. affordable dwellings with associated drainage and attenuation, open space and landscaping. Details of appearance, landscaping, layout and scale to be considered, plus details for discharge of conditions 11, 12, 13, 15 and 16 from the Outline permission.		
Site Visit Made:	Yes/No		

Summary Of Recommendations

- ☐ Recommend approval but with condition(s) & reason(s) **stated below**;
- ☐ Recommend approval with no conditions
- ☐ Recommend refusal for the reason(s) **stated below**;
- ☐ Negotiate the amendments **stated below**; or
- ☒ Request further information before determination as **stated below**. – [See use of Oaks](#)

Comments On Proposal

Planting Plans (Drawing Nos. 3249-5-2-DR-5001-07) are shown across 7 drawings, with the 7th sheet including the Plant Schedule.

In my previous comments dated 4.4.24, I had a number of queries most of which have been resolved following discussions between the Case Officer and the Agent, (Responses in blue).

Some queries previously unresolved are listed below as being agreed, however the issue of the use of Oak and Horse Chestnut has been discussed further below. It is felt that as there are mostly Oaks on site that in line with the landscape guidelines there should be successional planting of large species trees, in this case Oaks. See my comments below.

- I have further comment regarding the design of the Kneerail fencing located to the rear of the swathes of daffodils which run along both sides of the road but creates a pinchpoint next to the wet basin on the west side. Is the kneerail a necessary feature in all of the extents shown? There is not enough space to mow the grass between the kneerail and the pond edge, but I can see the kneerail may protect from falling close to the pavement. Is there anyway that the kneerail design can be improved visually from the standard detail which I assume it is? A new interpretation that is site specific would improve the arrangement and work with the design and doesn't have to be expensive, especially if rationalised. I do not think it really matters that no mowing can take place in the tight areas as leaving the grass to grow will work with the character of the west side of the site and between the pond edge. A mowing strip to the edge of the road once the daffodils have gone over is enough. (Check LEMP) – 0.5m gap meets the standard width of a mower and highway verge (accepted) . Regarding the design of the kneerail – it has been agreed with the Case Officer and Agent that it will remain in its current proposed form – accepted.
- The native scrub boundaries along the western site boundary are shown as a very organic line – will the planting line be set out this way or is it indicative of the 'spill' of the scrub? I note that there is little space between the scrub and the western edge of the 2 long thin attenuation basins a 'no-go' area where public access is not encouraged in favour of biodiversity which is supported. – Scrub line is meant to meander which is accepted
- There is a small LAP play area to the south of the site (protection to ditch) can the knee rail be a site specific design? The knee rail fence is installed in the RPA of an existing tree. (see comments on kneerail above) - see above current design proposed for kneerail accepted
- On the east side of the site the rear gardens boundary treatment is a brick wall with trellis – although no height is added in the key – please address. There is also a narrow grass strip to the rear of this which I assume is a maintenance strip between the wall and the native scrub to the site boundary. The strip is fenced at the southern end and gated at the north. – Is acceptable. .1.8m high fence is accepted
- I note that the main tree species used is Birch where 24No. are proposed around the wider site. There is no Oak proposed – please make sure that Oak replaces some of the Birch, and there is more of a balance of other native tree species if possible. Although having a dominant tree species might be part of the planting design approach, but there is still room for greater diversity in my opinion. I also note there is no Holly specified – is there a reason for that? Holly would provide the evergreen percentage to the native hedge as well as the scrub mix or Privet? –

I note Holly will be used and that Hazel will replace some of the Birch, but Hazel is not a climax tree species.

It seems Oak has not been used due to Oak Processionary Moth – but Horse Chestnut is being used that is affected by leaf miner and bleeding canker.

It has also been suggested that extra heavy standard Oak trees often are not sustainable and do not thrive when planted in new schemes. I suggest that smaller sized Oak is planted within the areas of scrub – which is traditionally where Oaks were protected by Hawthorn trees – and the trees clearly marked so they do not get cut back with the rest of the scrub.

I also suggest that within the LEMP, there is a section on identifying pathogens that may affect certain trees and what the remedy might be if any.

I do not object to using Horse Chestnut as they are splendid trees in the Spring and part of the Summer and only affected later in the season. Oak processionary moth is not to my knowledge in this part of the borough. Please include some younger Oaks as suggested in the Softworks Condition drawings.

- I also note the use of Prunus l. 'Otto Luyken', a plant associated with business parks – can this be replaced by another more interesting gardenesque shrub? - Being replaced with Choisya 'White Dazzler' which is acceptable thanks
- I am concerned about the viability of the specified trees between parking bays – although I note the use of the very narrow Hornbeam selected which is a good choice, I am concerned that where these are surrounded by hard landscaping they will have a restricted rooting area, and a slightly different tree pit to those submitted which have been used elsewhere on Council development sites may be preferable (see Fig. 1 below) which would provide a greater area of rooting volume? – Response Noted and agreed
- A tree to the east side of the site on sheet 5 has not been labelled – see comments regarding tree species. – Noted and resolved

Queries regarding boundary treatments x5

Drawing 24009-DWC-SP013-01-DR-A-0010-B-Indicative Level Information – specifically finished floor levels and indicative retaining wall heights.

- The rear of Plot 8 has a retaining wall of 630mm and a 1.8m brick wall over which is within the RPA of T67 an 'A' quality Oak tree and Ecology Tree No. T7 has bat roosting potential). There is no mitigation for this in the Arboricultural Method Statement but is clearly shown on Dwg. No. PRI24594-03A Tree Protection Plan page 1 of 2.- Will be included in the Tree Protection Condition drawings.
- The Hard Surface and Furniture drawing and Landscape Masterplan shows a gated access to what I assume is a maintenance strip to the rear of Plots 1-8, but the Indicative Level Information drawing includes no means of access to this space, just the boundary treatment of post and rail timber

fence. Please confirm use of this strip and ensure all drawings are consistent – [Resolved](#)

- Plot 7 shows boundary C/B fencing over a concrete gravel board – permeable gravel boards must be included along each fence run for hedgehogs, please update plans.- [It has been agreed Hedgehog Highways are to be included on the condition drawings as well as within the LEMP](#)
- Close board fence height not specified but assume 1.8m max. no trellis tops shown over 1.5m between gardens but are included on top of the boundary wall to r/o plots 1-8 – please confirm site wide use of trellis as appropriate and re-submit drawings.- [No trellis tops between gardens has been agreed](#)
- The hard landscape and boundary fencing drawings (Hard Surfacing and Furniture Proposals Dwg. Nos. 3249-5-2-DR-5008 P7 and 3249-5-2-DR-5009 P7) are showing non-permeable tumbled block paving in Silver Haze and Burnt Oak , and tarmac to roads and driveways and self binding gravel to informal paths. [Non – permeable is acceptable in landscape terms](#)

Arboricultural Information – Condition 13 – Queries x2

- 2 colours shown as tree protective fencing – blue is not included in the key – for avoidance of doubt please address, also see no chestnut fencing (as per AMS para. 2.10.1) included on the Tree Protection Plans – [will be updated on the Tree Protection condition drawings](#)
- Earlier comment regarding the incursion into root protection area of T67 Oak ‘A’ quality tree from proposed garden walling – appears to be overlooked in AMS . Please ensure avoidance of development / mitigation and resubmit TPP and AMS. There is clearly a significant level change in this location but there is no indication of actual existing and proposed site levels on the ‘Technical Development – Site Plan-Indicative Level Information – Dwg. 24009-DWC-SP012-01-DR-A-0010-B. or the Tree Protection Plan. – [This issue will be addressed in the Tree Condition Drawings](#)

Veteran Tree Management Plan

- I note Mr. Marley says in his letter accompanying the application that the Veteran Tree Management Plan was determined at outline decision as being required prior to the first occupation of the development and **not** prior to development commencement (which is correct according to the wording of the condition in Inspector Report) [The Veteran Tree Management Plan will be submitted as part of the Tree Protection Condition](#)
- I am satisfied that the Veteran trees buffer zone and their protection during construction is acceptable as per the Condition Tree Protection Plans – Drawing Nos PRI24594-03A page 1 and page 2 (except that the second page is also page 1 and I assume it should be labelled page 2 of 2.) – [see above](#)
- The Landscape Masterplan- Dwg. 3249-5-2 – DR-5000 P8 shows a timber post and rail fence with a single gate that follows the extent of the Veteran

tree buffer zone and a native hedge is proposed to be planted around the outside of the fence and be maintained at a suitable height. height not specified in the LEMP - [Agreed](#)

- The AMS has been amended in February 2025 in sections 2.6 for Ecology and 2.7 Arboriculture. Section 2.7 states that it has been agreed with the LPA that the Veteran Tree Management Plan and Buffer Zones (VTMP) will be compiled at a later date. The Buffer Zones are shown as amended the Tree Protection Plan to the correct calculation. A detailed methodology for the area beneath the Veteran trees will be recorded in the VTMP and will be a combination of fencing and lack of mowing will limit access to the area until the hedgerow has established. The fence line will be retained to avoid impact to the hedgerow and the RPA of the trees. A timber post and rail fence at 1.1m height is specified on the Hard Surface and Furniture Proposals drawing 3249-5-2 – DR-5009 P7. The timber fence will eventually break down without detriment to the tree which is acceptable.- [see above](#)

LEMP - Queries

I cannot see anything about checking tree ties and stakes and for windrock which are often overlooked. These items would generally be included in a Landscape Specification which I have not seen in the submission, or a comprehensive specification for planting depths of shrubs, herbaceous, bulbs etc. Has a Landscape Specification been prepared and will it sit alongside the LEMP? – [Will be included in the LEMP](#)

NB – Is there any information regarding construction of the permanently wet pond? A detailed section would be useful. – [Will be in the Engineers condition](#) – **however this is also a landscape matter and a cross section showing profile and planting should be included on one of the Softworks Plans at part of the Landscape Condition**

Conditions & Reasons (if required)

Date:	07.05.25	Signed:	B. Crafer
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