

MEMORANDUM

From:	Brigitte Crafer Landscape Architect	To (Case Officer):	Kieran Neumann
Service	WBC Landscape and Trees	App No:	242665
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**.

Comments On Proposal

Landscape Masterplan – Drawing Number 3249-5-Z-DR-5000- Rev.P08.

The revision to the previous masterplan P5 submitted in October 2024. The key change is the removal of turning heads to the south which have resulted in a slightly wider buffer zone to the Veteran tree buffer to the SW of the site. The redesign also enables an improved solution to the layout of the POS between Plots 24 and 26. The turning heads have been replaced by 2 visitor parking bays to the SW side opposite plots 36 and 37.

There are 3 separate strategy sheets for 'Landscape – Open Space Strategy', 'Landscape Sustainable Drainage Strategy', 'Play Areas', which provide clarity on the design and planting approach.

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

planting and planting within a built area. Having studied the drawings I have the following queries/comments that relate to the masterplan and planting plans;

Some queries on the layout design x10

- I note from the Planting Plans that the entrance feature both sides of the road is swathes of daffodils and not hedging which I mistook it for initially before zooming in considerably on the masterplan (also see Planting PlanDR-5001). I note the response regarding the magenta line in the letter from Mr. Marley thank you. No issue with daffodils
- 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)
- Does anything replace the swathes of daffodils or does the space just revert to mown grass/meadow for the rest of the year? NB. It is very difficult to see the difference on the plans between the Amenity Grass and the meadow grass. I think its amenity grass either side of the entrance road but not completely sure. I say this as much for a contractor as for myself to understand the arrangement.
- 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.
- 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)
- 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.

- 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 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?
- 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?

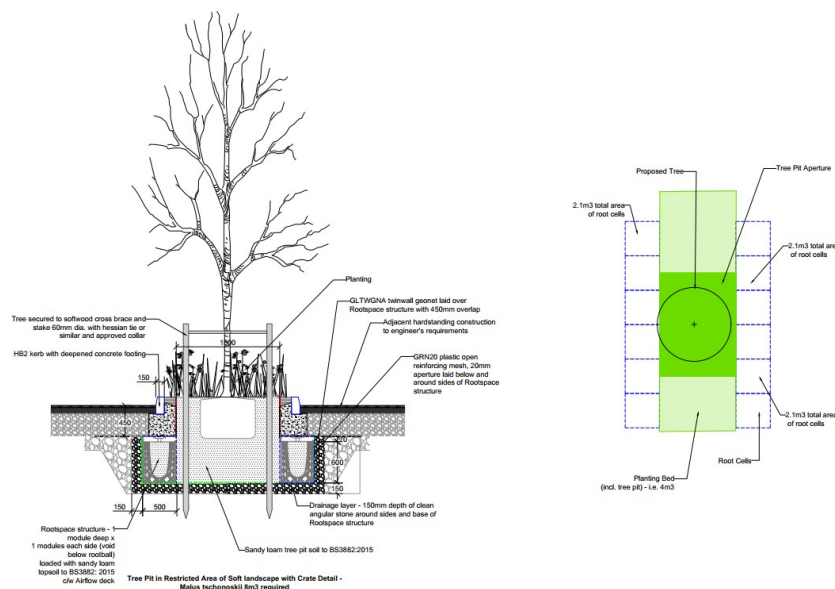


Fig. 1

- A tree to the east side of the site on sheet 5 has not been labelled – see comments regarding tree species.

Positive features/additions to the layout

- The Veteran tree buffer zones are marked by a 1.1m high timber post and rail fence that will have a single entrance gate and be planted with a native hedge to the outside edge of the fence. (in response to my previous comments where the Veteran tree buffer has also been increased).

- I note that there is lots of incidental planting / little public spaces built into the housing layout which is a really noticeable and positive feature around the site and helps to ease the urbanism into this countryside location. The spaces provide seating in some cases and are backed by brick walls / fences over which provides a good backdrop to planting and adds to the positive character that the development is hoping to achieve.
- The 'key view' is another very useful design tool to provide permeability, legibility and visual connections as well as central orientation point and meeting point where planted gardens enhance the space.
- There is a comprehensive SuDS train, and rain gardens have been introduced to the edges of some of the POS and are features in their own right. (No planting spec as yet included in the Plant Schedule). The layout contains an existing refurbished pond/wetland area and a permanently wet entrance pond feature to the north at the entrance and the 2 narrow attenuation basins to the western edge, which are not permanently wet, but will be planted with a wet grassland mix. The ditches to the south are retained and incorporated into the SuDS.
- There is some street tree planting – but on the east side the larger tree planting is to the west side of the large POS which provides a sense of an avenue, and on the west side there is more tree planting again on the opposite side of the road to the dwellings. There is smaller tree / shrub planting to front gardens.
- 2 No access points to Stanbury Park SANG to the south.

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.
- 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
- 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.
- 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.

- 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
- 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.

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) however, the condition also states that the first 3 elements of the Plan shall be implemented also prior to first occupancy which are;
 1. Specialist survey method assessment of the trees – Not yet received
 2. Individual tree management programme geared towards maximising longevity – not yet received
 3. Provision for maintenance of a knee rail style fencing beyond crown driplines, enclosed access deterrent planting. – included in the landscape masterplan and planting plan and method of protection is acceptable
- I am satisfied that the Veteran trees buffer zone and their protection during construction is acceptable as per the 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.)
- 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
- 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.

- No tree removals are required to facilitate development but quite a large area of boundary hedgerow G72 will be removed in the north of the site and a section of boundary hedgerow to create a single access to the SANG to the southern site boundary which is accepted.

LEMP – Condition – 16 - Design Objectives are laid out in the Landscape masterplan Dwg. 3249-5-2-DR-5000-P8 and in 7No. Planting Plans 3249-5-2-DR-5001-7-P7

The LEMP relates to areas of open space outside of private curtilages e.g gardens, driveways and associated ornamental areas, that area subject to works carried out by the management company within the development – see Drawing 5796/LEMP1.

Management for achieving aims and objectives;

- Management of *existing features* including retained Veteran and non-veteran trees, scrub and hedgerows, enhanced wildflower grassland, and management of ditches to benefit floral diversity and wildlife opportunities.
- Management of *new habitats* including tree, hedgerow and shrub planting, flowering lawn, pond creation, ornamental planting
- Management of *new faunal enhancements* including bird, bat and dormouse boxes, fence cut out for hedgehogs, log piles/hibernacula, bee bricks.

The management of each individual landscape feature is described in Chapter 6 and includes;

Veteran Trees – which be set out in a Veteran Tree Management Plan

Retained trees and hedgerows will be protected during construction and enhanced with native woody species.

Retained and enhanced wildflower grassland – new areas will be created by seeding with a flowering lawn mix and overseeded with swathes of Tussock grass and general purpose wildflowers to ensure a diverse sward.

SUDS and Retained Ditches – The habitats will be sown with SUDS basin wet grassland mix and Proposed Wetland Marginal Enhancement Mix. A method for protection of SUDS features during construction is included. The ongoing management of the SUDS, ditches and marginal vegetation will focus on

maximising benefits for wildlife whilst maintaining healthy marginal and aquatic fauna and flora..

Native Trees and Shrubs – Weed control and addition of mulch to support growth and use of mulch mats around the base. Tree guards and shelters to protect against grazing damage. Ongoing management ‘as needed’ with checks every 3 years by arboriculturalist / landscape contractor **which should include checking tree ties and timber stakes where used.** The planting specification for the native hedgerow is included.

Flowering Lawn – details the specification for seeding following soil preparation with specific management for the first year of the lawn detailed followed by ongoing maintenance once established.

Ornamental Planting- herbaceous, bulbs and ornamental hedges – Including shrubs - to areas of incidental landscaping/public space within the development. No planting specification in the text.

Ponds – includes the permanently wet basin at the site entrance and the Proposed Wetland / Marginal Enhancement Mix shown on the planting plans from David Jarvis. Natural colonisation favoured but with some new to assist establishment. A watching brief will be employed for management of invasive exotic species.

Faunal Enhancements – locations of faunal enhancement measures including bat, bird and dormouse and bee bricks, garden fence cut outs, and log piles/hibernacula are shown on Drawing 5796/LEMP3.

General maintenance should adopt the following in order to benefit wildlife; Avoid use of pesticides and fertilizers particularly around SUDS, ponds and wetland. Regular removal of litter, regular monitoring and inspection of habitat areas, In addition monitor and address dog fouling, fly tipping, arson, pollution.

Work Schedules are set out at Appendices 5796/LEMP2 and 5796/LEMP3 in a list of items to monitor which is acceptable. All items are acceptable regarding landscape.

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?

NB – Is there any information regarding construction of the permanently wet pond? A detailed section would be useful.

Conditions & Reasons (if required)

Date:	02.04.25	Signed:	B. Crafer
--------------	----------	----------------	-----------