

Brislington Meadows - Landscape Comments - Application Ref. 22/01878/P

The application is submitted in outline, with all matters apart from access, relating to appearance, landscape, layout and scale, reserved for future approval. The comments received from the Council's Landscape Officer raise concerns and refer to a significant amount of design detail that is not appropriate at this outline stage, and that goes beyond the requirements of an outline application and the requirements set out under the Site Allocation BSA1201.

Illustrative material in relation to proposed earthworks and cut and fill impacts in respect of existing and retained trees, was submitted to the Council in response to the initial comments from the City Design Group. This information was illustrative only and further detail in relation to proposed site topography and construction of the development and the housing would be a matter for detailed design stage and technical construction stage.

Notwithstanding this, we provide below a response to the comments raised by the Landscape Officer. However, these comments are made on a without prejudice basis and noting that these are all matters for detailed design stage, when matters relating to proposed landscaping and layout are for full consideration.

Landscape context

BCC Comment	Design Team response
The Brislington Meadows site is the northern part of a large area of landscape in the eastern part of Brislington. It is made up of agricultural fields, park, cemetery, woodland areas and brook with landscaped edges. This area of landscape forms part of a green infrastructure continuum from the green belt through Brislington to the wooded Brislington Brook valley and the River Avon landscape edge.	<p>The landscape context is understood. The site is allocated for development in the adopted Local Plan following Local Authority appraisal of the context and the conclusion in the Sustainability Appraisal, prepared in support of the Local Plan, which concluded:</p> <p><i>4.91.5.1 The reduction in the size of BSA1201 will retain a much larger area of SNCI assisting in protecting this more valuable land assets in the city. In addition development considerations introduced on the Preferred Approach for the site have enhanced clarification in relating to mitigation of any lost SNCI land. The development considerations now effectively require compensation and mitigation to reprovide, offsite and nearby, the type of habitat which might be lost to development. This is considered to reduce the potential for negative effect from harm or net loss of SNCI land in the city, creating an implementation dependent effect conservation and wise use of land.</i></p> <p>The specific requirement to retain landscape and green infrastructure connectivity to adjacent open spaces has been included within the requirements of the site allocation, and the scheme has been designed to provide this connectivity.</p>
The site itself is a topography steep green hillside. The north part of which is a high point within the cityscape at approximately 60m AOD, which affords extensive view over the city and to Dundry Hill beyond. It is made up of a collection of small-scale agricultural grazing fields with generous hedgerow	The site is allocated for development in the adopted Local Plan in the knowledge of its composition of fields and hedgerows.

boundaries, which have remained largely unchanged since the 1840's field pattern.	
<p>As stated in the ecology comments these hedgerows are defined as 'Ancient Hedgerows', which are irreplaceable natural assets making this site a sensitive landscape site.</p> <p>This is contrary to the stated value attributed to the site within the TVIA.</p>	<p>We acknowledge that the hedgerows are of importance under the Regulations, however, that in itself does not preclude granting of planning permission. Trees and hedgerows have been subject to tree surveys in addition to extensive botanical and habitat surveys. All hedgerows were assessed to be 'important' under the wildlife criteria and separately under the landscape criteria of the Hedgerow Regulations 1997. However, it is not practical or viable to retain all important hedgerows within the requirements of delivery of c. 300 homes under site allocation BSA1201 of the Development Plan. The mitigation hierarchy has been applied to hedgerow loss/retention decision making and appropriate provisions for mitigation and compensation measures are described in the Ecological Impact Assessment (EcIA) and Outline BNG reports.</p> <p>There is no ecological or arboricultural evidence that the hedgerows contain ancient trees or ancient woodland, which would trigger NPPF paragraph 180 (c). Whether there has been a hedgerow at this alignment for a relatively long time, which therefore has heritage interest and/or associated habitat quality is a separate and different point.</p> <p>See detailed commentary in the Applicant's response to the Arboricultural / Ecology statutory consultation comments.</p> <p>The Townscape and Visual Impact Assessment (TVIA) sets out how it has reached its judgements with regard to landscape susceptibility and value, and how this has led on to the judgment regarding the sensitivity of the landscape / townscape. The approach adopted within the TVIA is in accordance with its GLVIA3 compliant methodology.</p>
It is currently popular with the local residents as a natural open space giving the site community value. The southern edge of the site that borders the landscaped edge to a small watercourse which connects to Brislington Brook has a Public Right of Way providing a link between Bonville Road and the Brislington Trading Estate to the east and School Road to the west via the Allotments.	<p>The site is allocated for development in the adopted Local Plan in the full knowledge of its perceived community value.</p> <p>Public rights of way will be retained to provide links between Bonville Road and the Brislington Trading Estate to the east and School Road to the west via the Allotments. A new pedestrian and cycle route is also proposed to connect to Allison Road / Fermaine Avenue to the north.</p>
A second footpath is located on the north east corner of the site.	This public right of way between Bonville Road and Belroyal Avenue will be retained.

Landscape Comments

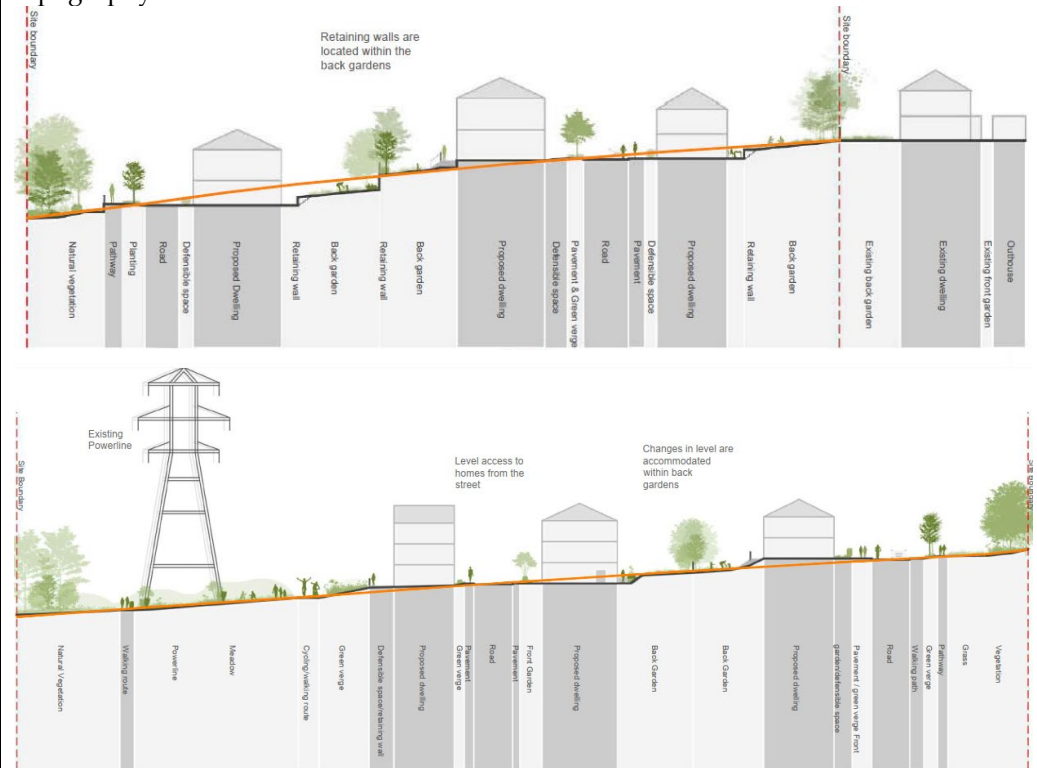
BCC Comment	Design Team response
<p>The proposals broadly remove the ancient hedgerows and associated trees internal to the site with only a small section of hedgerow running north/south in the middle of the site retained. This runs contrary to Policy DM17 Development Involving Existing Green Infrastructure which states;</p> <p><i>'Proposals which would harm important features such as green hillsides, promontories, ridges, valleys, gorges, areas of substantial tree cover and distinctive manmade landscapes will not be permitted.'</i></p>	<p>It is not appropriate to reference Local Plan policies in isolation. Policy needs to be considered in the context of the policy requirements of site allocation BSA1201. Hedgerow and tree removal is inescapable when c 300 homes are to be delivered as per the site allocation.</p> <p>It is inaccurate and misleading to state that '...only a small section of hedgerow running north-south in the middle of the site is retained'. The Landscape Parameter Plan indicates; following extensive ecological, arboricultural and heritage survey, the sections of hedgerow identified as being of most value have been retained where possible to facilitate important green links. This includes also a section of hedgerow retained in the north eastern part of the site and this forms part of the proposed Brislington Green open space. In total, the EcIA estimates that through retention and replacement hedgerow planting, this would result in a net total of 725m in hedgerows within the site (delivering net gain).</p>
<p>Further, the site allocation information states that development should;</p> <p><i>'retain or incorporate important trees and hedgerows within the development which will be identified by a tree survey'.</i></p>	<p>Identification of tree and hedgerow retention and loss was informed by extensive ecological, arboricultural and heritage surveys. It is a balance between achieving the number of homes set out in the site allocation and the retention of key trees and hedgerows. The scheme has retained and reinforced the prioritised green links through the site. There is one veteran tree within the southern hedgerow, which is not an Ancient Tree, and this has been retained.</p>

Topography and Earthworks

BCC Comment	Design Team response
<p>To accommodate a traditional housing typology with single flat finish floor level the site is proposed to be reprofiling with substantial earthworks. This has resulted in an engineered approach to the sloping topography of site with extensive;</p> <ul style="list-style-type: none"> retaining walls and tanking to the buildings faces; earthworks throughout the site fundamentally altering the landform. 	<p>The planning application is made in outline and the Illustrative Masterplan submitted is therefore for indicative purposes only to show how one way in which the parameter plans could be delivered. The final approach to dealing with layout and the significant level changes will be decided at reserved matters planning stages.</p> <p>The illustrative layout developed to date has been based on balancing cut and fill effectively over the site, creating accessible streets by minimising the amount of level change on the primary and secondary streets and creating flexibility on plot for a variety</p>

of built solutions to be developed, ranging from under-build, opportunity for split-level housing, terraced garden walls or larger retaining structures at plot boundaries.

The following images, taken from the indicative sections plan submitted (Drawing No. 7456_017ZB), illustrate how the proposed landform closely follows the existing topography of the site.



As such, the proposals work with the natural topography/landform of the site as much as possible and this has helped enable the masterplan to:

- retain trees and hedgerows and a clear network of ecological corridors where possible.
- manage the scale of engineering works, i.e. concrete retaining structures and earthworks to create development platforms;
- provide a deliverable gradient highway down the slope;
- facilitate natural surface water drainage to the lower part of the site;
- manage building heights and visual prominence of the scheme that may otherwise result from the use of extensive retained development platforms not employed in this scheme;

	<ul style="list-style-type: none"> • minimise overlooking on existing residents and, where practical to respect their views as new homes step down the slope. This includes avoiding unbalanced plot levels raised above or below the street; • incorporate accessible gradual paths to overcome steep gradients that could be caused by retained development platforms; • balance cut and fill across the site, the indicative volumes of which are considered to be acceptable; • create accessible streets and minimise the amount of level change on the primary and secondary streets; • deliver a positive and level interface between the development plots and the existing hedgerows and to prevent encroachment into root protection areas; • capture the best key views out of the site from the upper reaches of the site. <p>Counter to the consultation comments, the site levels have been designed in order to retain as much tree and hedgerow as possible and avoid substantial earthworks</p> <p>The illustrative Isopachyte Plan submitted illustrates the extents of the earthworks in relation to proposed trees and hedgerows and their respective root protection zones. With the exception of the SuDS drainage ponds, the earthworks modelling shows the general depth of cut is around 1m with discrete areas of slightly deeper cut of up to 1.5m. Retaining wall heights are generally 1m in height, although some are required to be higher in discrete parts of the site.</p> <p>Notwithstanding all of this, a degree of engineering is obviously required given the steepness of the site, but this is not considered to be in any way excessive.</p>
<p>This approach runs contrary to the Bristol context. There are numerous examples of the distinctive approach to visually prominent steep sites both historically and recent, with a saw tooth profile following the topography retaining the existing landform designing out the need for retaining walls.</p>	<p>Due to the topography of the area, the local (Brislington) context actually appears to be characterised by terraced streets with significant retaining walls and stepped frontages, which are difficult to access, and therefore do not conform to current masterplanning standards or guidance such as Building for a Healthy Life and the Equality Act that new housing developments adhere to. Examples of this are numerous and include:</p>



Bath Road, Brislington

In other parts of the local area such as Langham Road, Knowle and School Road, Brislington, terraced housing built on a slope generally still require retaining walls between driveways and between private rear gardens.



Langham Road, Knowle

The most recent examples are the Kingswear and Bridge View schemes. These housing schemes on steep sloped sites have understood the Bristol context delivering housing types with a split-level housing typology with a visually distinctive repetitive rhythm of terrace house that reflect the historical context.



School Road, Brislington

The earthworks strategy does account for stepping of houses down slopes – it is not intended to create flat platforms for a whole block or a whole row of terraces. There will be changes in height between individual dwellings to suit e.g. in a row of terraces and therefore the Bristol characteristic of houses stepping down a slope will be retained. However, this has to be in the context of designing streets and pavements that are accessible and in accordance with Building for a Healthy Life by providing a deliverable gradient highway down the slope. Therefore level changes are accommodated within the back gardens rather than at the front of homes to allow level (flat) access to homes.

Kingswear (LPA ref. 21/00824/FB) – this development is referenced in the submitted DAS and Design Code as a good example of recent development in Bristol. However, we note that there are still significant retaining structures in the rear gardens of dwellings. Notwithstanding this, the Kingswear scheme is not wholly comparable to Brislington Meadows as it is a narrow site with single sided development.

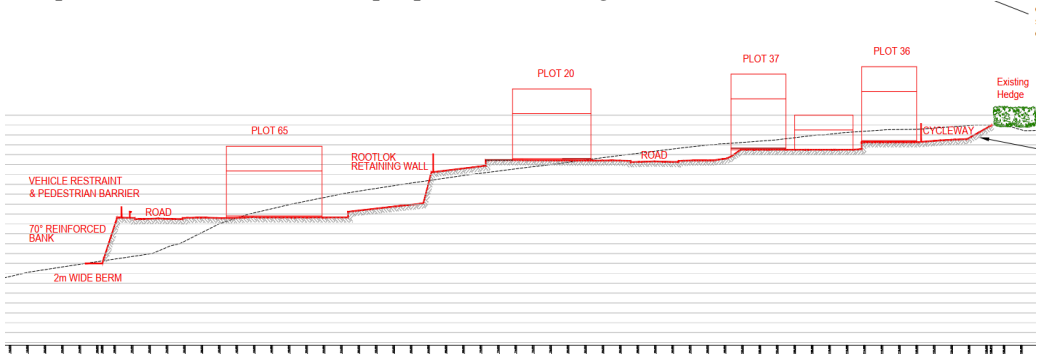
The Illustrative Masterplan is one way in which the parameter plans can be interpreted. Our design approach has been to focus on reducing the dominance of vehicles on street, and therefore its suggested in the Illustrative Masterplan that parking is provided to the side of detached and semi-detached dwellings, enabling more active frontage onto the street, as well as opportunities for landscaped front gardens. Whilst the location of parking has an impact on the earthworks strategy it enables more room in the street corridor for planting trees.

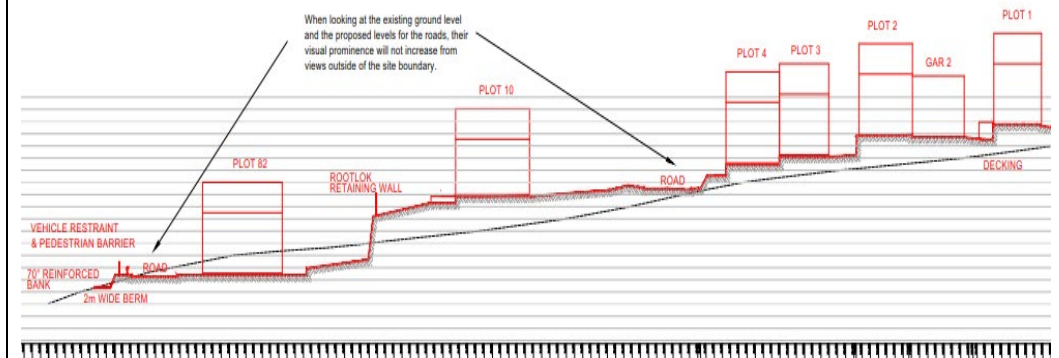
The masterplan is illustrative at this stage, it shows one way in which the parameter plans could be implemented. See Design Code pages 64 – 67 for principles regarding approach to development on a slope which future reserved matters applications must comply with.

The indicated levels design accommodates both ecological features and compliance with the principles of ‘Inclusive Mobility’ to avoid discriminating against those with disabilities by encouraging level access from the street to the front door. Particular consideration has therefore been given to complying with the Equality Act 2010 and Part (M) of the Building Regs.

We disagree that the proposed development is overly engineered. The proposed development generally follows the natural slope of the hill as close as practicably possible with general reprofiling of around 1m as shown by the indicative cut and fill model and cross-sections above. Furthermore, the retaining walls have been spaced across the development profile as it follows the topography down the hillside. This has enabled retaining walls to be kept relatively low, unobtrusive and hidden within plots, although the steepest areas have necessitated higher retaining walls up to 3-4m in discrete parts of the site.

In comparison, the Bridge View, Novers Hill scheme illustrated below (LPA ref. 21/05164/F) appears to comprise several larger retaining walls across the development platform. The latest cross-sections submitted by that applicant, as below, illustrate the 4m high reinforced rootlock retaining wall and 5m high 70 degree reinforced bank in comparison with the landform proposed at Brislington Meadows.





It is understood that an option to lower the level of a road has been explored in the Bridge View scheme but may have the corollary effect of increasing retaining wall heights to between 3-4m, adding 2m high retaining walls on the site boundaries and significant cut into the site and split level housing would still need to have a stepped access to the front of the dwellings (moving away from the Part M4(2) requirement).

- the existing landscape structure of hedgerows and trees requiring removal of the majority of these elements;

The landscape structure of the hedgerows is respected and protected where possible. Notwithstanding this, the percentage of loss of hedgerows in the scheme is around 74%, although new hedgerow planting is proposed to replace this loss within the scheme, with an estimate for new planting to result in a net total of 725m in hedgerows within the site (delivering net gain overall), as set out in the EcIA.

- the usability the garden areas with:

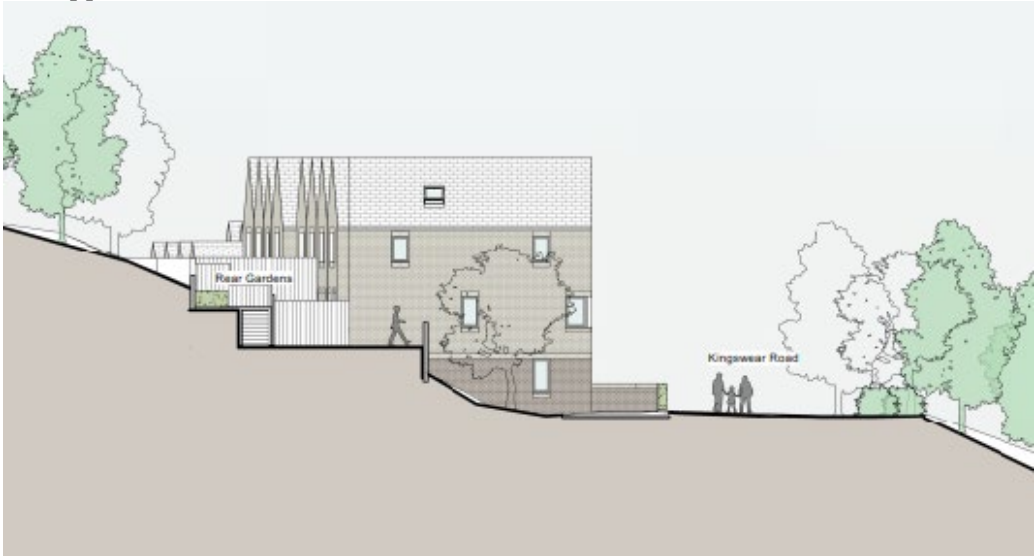
See comments below in relation to the back gardens.

- increased overshadowing;

The Illustrative Masterplan layout has been designed in accordance with the standards to avoid overshadowing. Furthermore, the houses are aligned on a north-south alignment so that they all receive light and can make use of this renewable low carbon solar energy. If they were aligned in a saw-tooth fashion down the hillside, this would not be possible. In addition, the layout provides all with an outlook onto landscape from homes.

- Privacy issues for the garden and internally to the houses from the houses on the upper levels looking down on the lower level housing;

Back to back distances have been carefully considered in preparing the Illustrative Masterplan. As a minimum they are 20m from the back of one property to another. In addition, the back-to-back interface has been used where proposed dwellings back onto the boundary of the site, adjoining existing dwellings back gardens, completing the 'block' of housing and creating a defensible boundary to existing dwellings.

<ul style="list-style-type: none"> - Reduced sunlight penetration; 	<p>As noted above, the majority of dwellings are proposed to be orientated on a north-south alignment to take full advantage of daylight and sunlight.</p>
<ul style="list-style-type: none"> - Reduced usability of gardens due to the gradients; 	<p>The gradients of private gardens have been set at no more than 1:10, which is useable.</p> <p>In comparison, the rear gardens in the Kingswear scheme (LPA ref. 21/00824/FB) are terraced with stepped access as shown below by the typical section plan submitted with that application.</p> 
<ul style="list-style-type: none"> - Overbearingly large retaining wall and fence in the worse cases. 	<p>Generally, retaining walls are circa 1m in height within the Brislington Meadows scheme in order to provide a level access to the front door and minimise the use of the use of steps at the front door. As such, the retaining structures are on balance not considered to be excessive for a site like this. Where the site is at its steepest and where there is no other practical solution, it may be necessary to incorporate higher retaining walls.</p>

Landscape Proposals

BCC Comment	Design Team response
The landscape proposals have been described as character areas, including, Wetland Meadow, The Gate, Brislington Green, Brislington Heights Pocket Park, The Greenway, Woodland and Bonville Glade. Below are comments on each of the character areas.	Noted.

Wetland Meadows Southern edge landscape strip

BCC Comment	Design Team response
<p>The Wetland Meadow along the southern edge of the site has two large areas with extensively engineered slopes along the southern edge proposed to deliver a 'Wetland Meadow' and SUDs. However, the severe banking and slopes render these areas uncharacteristic of wetland meadows inappropriate to the surrounding character, have limited amenity value and sterilise this southern part of the site reducing the amenity value of the brook along the southern boundary and visually severing the Brook from the footpath and potentially dangerous for children. This approach is this contrary to the character of the site and the Policy DM27: Layout and Form states:</p> <p>'Through high quality landscape design, development will be expected to contribute to a sense of place with safe and usable outdoor spaces which are planned as an integral part of the development and respond to and reinforce the character of the context within which it is to be set.'</p>	<p>The Design and Access Statement notes that the Illustrative Masterplan aims to optimise the topography, ground conditions and 'no-build buffer' beneath the pylons to create large areas of biodiverse wet grassland on the lower slope.</p> <p>The banks to the SuDS ponds are currently shown to have an acceptable 1:3 slope, although attempts have been made to blend this landform as sympathetically as possible in order to soften the visual impact of the drainage pond features. However, the lower parts of the site where these ponds need to be located are constrained by the proximity of tree root protection zones that have been avoided.</p> <p>Notwithstanding this, the SuDS ponds could potentially be engineered on their northern edges in order to set the ponds deeper into the hillside and reduce the height difference on their southern slopes. This would be a matter for detailed design stage.</p> <p>However, it should be acknowledged that this area is not aimed at being play-space, there are other parts of the site that facilitate more useable outdoor playspace as well as the adjacent Victory Park to the south. The Wetland Meadow is primarily aimed at - enhancing ecological aspects and providing accessible walking and cycling routes including boardwalks, to provide access over the wet grassland without detriment to the grassland habitat itself, across the SuDS features.</p>
Further, the SuDS landform is contrary to the gentler slope from the high point along the northern boundary to the southern boundary along the brook. This would diminish the existing landscape setting along the footpath with	The 'brook' located adjacent to the southeast corner of the site, comprises a partly culverted unnamed tributary of the Brislington Brook to the west. This small ditch is generally not visible due to the overgrown nature of the bramble hedgerows and not

unnaturally steep banking along most of the footpath within the site. This approach is contrary to DM22 which states; 'Development which is adjacent to, or contains, waterways will be expected to: Take opportunities to enhance the recreation and leisure role on on-site waterway(s)..'	considered to be a prominent feature running alongside the current public footpath. It currently has no recreational or leisure role and there is no realistic prospect of supporting that role given ecological and landownership constraints. It is however intended that the wetland areas are accessible via boardwalks similar to that illustrated above, resulting in enhanced recreational and leisure value in the vicinity of the brook.
Additional information is required showing sections through this area showing the relationship with the existing tree belt with the SUDs retention basins.	See page 127 of DAS and the additional illustrative Sections Plan submitted (Drawing No. 7456_017ZB_Sections_Rev01-Section AA-BB-CC-DD-A1 L-compressed). This is something that would be clarified by detailed design at Reserved Matters stage.
Clarification is sought on the whether the cut and fill is balanced throughout the site or if more soil is being imported overall.	The indicative cut and fill modelling suggests a total cut of 27,000m3 and fill of 17,000m3 resulting in an overall surplus of soil material, which is anticipated to be re-used across the site within development parcels to achieve a balanced cut and fill in the final scheme. As such, additional imported soil material is not anticipated at this stage.

The Gate - Retained Central hedgerow and northern boundary hedgerows

BCC Comment	Design Team response
Looking at the Isopachytes plan within The Gate landscape character area it is likely that more of the centrally retained hedgerow/trees running north/south will require removal than currently shown. Clarification is required.	There is some minor overlapping of the root protection zone of the central hedgerow indicated by the illustrative cut and fill model. However, this would primarily be related to the removal of shallow soils to construct the footpath sub-base that runs through the area as opposed to the need for any significant earthworks to modify site levels generally. More detailed modelling will be undertaken at a Reserved Matters stage to resolve detailed design.
This area is edged with blank house side elevations with central raised walkway providing limited space for play and a poor relationship between the footpath and small areas of play. The lack of visual permeability from the houses, topography and limited space for play makes this area inappropriate as a LAP (a local area of play for very young children).	See Design Code (Section 5.4) where it is specified that there cannot be blank elevations along this edge The submitted Landscape Parameter plan shows indicative locations for play only at this outline stage. Future reserved matters applications may locate the play area in a different location if deemed appropriate at detailed design stage. Rationale for the suggested play space locations is provided in the Design Code in the analysis of each of the proposed character areas.
Concern is raised that this area would attract anti-social behaviour as it is poorly overlooked with an indistinct amenity function beyond the visual of the retained central hedgerow. As proof of concept sections, to scale, are required to show the hedgerows and the proximity of earthworks to retained hedgerows and trees and amount of amenity space.	Note comments above. Again, something that would be clarified by detailed design at Reserved Matters stage.

The Isopachytes Plan shows earthworks in areas also shown as ‘retaining’ hedgerow/trees along the northern boundary. Clarification is sought. The increase in earthworks in this area will likely require the removal of these areas of hedgerows.	On the northern boundary, the illustrated depth of cut is restricted to the topsoil scrape, although the modelling shows cut, as it has assumed that Formation Levels are the ‘Proposed Ground Level’ less 500mm. This accounts for the ‘colour banding’ shown in those rear gardens. Notwithstanding this, a sufficient stand-off distance from retained hedgerows and trees shall be in accordance with the ecological and arboricultural reports and the CEMP.
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The Greenway, Woodland and Bonville Glade

BCC Comment	Design Team response
The Bonville Glade and Woodland is a strip of broadly retained areas of existing landscape planting. The proposals fail to define the amenity value of this area and lacks road edge tree planting definition. It is considered the side elevations of the flats edging the Bonville Glade fail to comply with secure by design principles with poor overlooking. The proposals need to demonstrate that this ecological strip and associated animal species are robust to likely human activity from the residents of the flats, especially as these residents have not been provided with garden space.	<p>These are all detailed design points that would be addressed at reserved matters stage. The Design Code sets principles and design requirements for the treatment of road edges, requirement for street tree planting, overlooking of open spaces etc.</p> <p>The apartment buildings are designed to enable dual facing flats on the corners of the buildings, therefore providing more daylight to homes, and more opportunity for overlooking of the greenspace</p>
The Greenway needs to ensure both street trees and utilities can be accommodated within the space without impacting the ecology and how a footpath/cycleway will be integrated into the proposals.	
As proof of concept scaled sections and species within both The Greenway and Bonville Glade areas should be provided. The information should indicate the type of planting within both areas and their robustness of these areas to act as ecological network as well as accommodating footpaths and associated human activity.	

Brislington Heights and Brislington Green

BCC Comment	Design Team response
It is unclear if the retained planting within Brislington Green would be appropriate to this more formal area of space surrounded by housing and how this is compatible with this area as a play space. The central planting would potentially limit visual permeability of the space and therefore contrary to secure by design principles.	Retained planting will be incorporated into the detailed landscape design of this space at reserved matters stage. This an important east-west ecology link, so while there may not be full visibility north south, the open space is surrounded by homes providing 360° opportunities for surveillance onto the space. The Design Code also ensures development fronts onto this space, or where side elevations are shown, that they are activated with windows to maintain natural surveillance.

<p>The steep topography of the Brislington Heights space will limit the amenity use of this area, particularly as play space. Concern is raised that this area would attract anti-social behaviour as it is poorly overlooked with an indistinct amenity function beyond the visual amenity of the retained trees.</p> <p>As proof of concept sections are required to show the how the levels impact the amenity value of the space and the relationship with the surrounding houses. It should be shown that the area would comply with the design requirements for a LEAP.</p>	<p>Examples exist in Bristol of steep green spaces that are comparable. This is an existing characteristic of the site that we would like to retain.</p> <p>As above, the location and detail of proposed playspace is indicative only at this stage and will be resolved through detailed design.</p>
<p>It should be noted that the site has delivered no areas suitable for children to play ball games on a flat area.</p>	<p>Due to the steep topography of the site, this would be hard to achieve. Playspace specifically for ball games or provision of ballcourt or similar is not required in the site allocation nor been requested by Officers to date. The scheme will provide other appropriate areas of formal and informal playspace for children of all ages, as required by Policy. We are improving pedestrian and cycle connectivity across the site to enable ease to access to surrounding areas such as Victory Park which includes a flat area to play ball games.</p>

Back Gardens

BCC Comment	Design Team response
<p>The back gardens have been proposed as part of the ecology network throughout the site. This cannot be considered as providing a green corridor with native garden trees species as there is no control on how these areas will be managed. Some residents will choose to remove trees and pave over gardens which will undermine the ecological value and fail to provide the continuum of a green corridor.</p>	<p>Within the submitted Ecology Impact Assessment (EcIA), the gardens 'corridor' is considered as a secondary feature, providing permeability opportunities for wildlife - not relied on as a mitigation feature.</p> <p>EcIA para 5.35 states <i>"The majority of hedgerow losses occur within residential parcels. Loss of hedgerows H2 and H4 and partial loss of H3 (southern end) to deliver new dwellings is considered very likely to be unavoidable. Even if detailed design was able to retain additional lengths of hedgerow within the site, it is likely these would need to be incorporated into private garden boundaries and consequently functional loss would still be presumed."</i></p> <p>Even if a handful of gardens were to pave or deck the majority of the garden space, the general 'green' corridor would still persist with the proposed arrangements of back to back gardens that would provide permeability for a range of wildlife tolerant of semi-rural/urban settings. Para 5.51 states <i>"The abundance of new garden habitat is likely to be beneficial to a range of species recorded on site, including notable species dunnoek, house sparrow, greenfinch and wren"</i>. To make best opportunity of the gardens for wildlife, our mitigation measures recommend permeability measures for hedgehogs (gaps in fences) which would also provide permeability for slow worm and other small wildlife, in</p>

	<p>addition to native seed packs or a bird feeder provided for each residence together with a wildlife information pack.</p> <p>This opportunity is picked up in the DAS at section 8.3, but it is only identified as an opportunity for ecological connections and is noted as “Secondary Green Corridors”.</p> <p>Para 5.17 from the EcIA states, when cross-referencing with the BNG report to summarise the BNG calcs <i>“The Illustrative Masterplan focusses tree planting within the eastern green infrastructure corridor, along streets, at site boundaries in the west and north, around play areas and associated with the ‘garden corridor’ created by the line of back-to-back private back gardens that runs east-west through the centre of the proposed development.” This is evidenced by our Proposed Habitats plan Ref G7507.20.061 which maps all gardens as “u1 urban – built up areas and gardens”.</i></p> <p>Within the BNG metric, gardens are accounted for only as “vegetated garden” with ‘low distinctiveness’ and ‘poor condition’.</p>
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Streetscape

BCC Comment	Design Team response
<p>The streets proposed inadequate numbers of street trees for some streets to provide sufficient tree canopy to ensure urban heat resilience. Clarification is sought on how many trees would be in adopted areas of the street. Many seem to be located between on-plot car parking, which could potentially be removed. Each street type proposed should provide, to scale, sections through the different road types to ensure the street trees are viable, not too close buildings and with tree pits large enough to allow trees to reach maturity.</p>	<p>This is a matter for detailed design stage. The submitted Design Code sets principles in relation to the design of streets and the space required for trees.</p>