

External Comments		Bovis Comments
Comments from Rachael Simpkin, Staffs Moorlands. 18th February 2011		
Highways. Paul Hurdus (Development Control Engineer)		
1-3 bed dwelling houses 2 parking spaces; 4 bed dwelling houses 3 parking spaces; 1 bed flats 1 space; 2 or more bed flats 1.5 spaces per flat.		No action required
Developments with communal parking should have an average 1.5 spaces.		No action required
While SMDC parking standards were not saved in 2007 they are still used as a guide.		No action required
On the subject of the refuse tracking I have been advised by SMDC that a 12m refuse vehicle (as previously advised by Rachael Simpkin) will be used to service this estate. Accordingly the layout should be tracked to replicate this. Please advise me of the outcome of this tracking exercise.		A full tracking plan will be submitted with the application
Trees. Steve Massey (Trees and Woodland Officer)		
Parking spaces previously shown on the open space at the front of Plots 11 and 12 near the large Oak tree have now been relocated to the side of the houses, further reducing encroachment of development around this tree. This is an improvement.		No action required
Now only 1 tree is shown to be lost immediately to the north side of Plot 21. Bovis suggested that as this is a C-grade tree, it could reasonably be considered more expendable in order ensure undisturbed retention of the tree belt to the south side of this plot. We will have to take a view on this when the application is submitted (in association with fine-checking of all tree standoff distances). A site visit in due course will be useful in this respect.		A category C tree was removed in this area. A further 3 trees are proposed in this area.
Bovis need to check the root protection area for the existing mature Pine tree adjacent to site Access D, and adjust the indicated tree protection fencing to suit.		The rootprotection area for the Pine tree has been confirmed and the layout revised accordingly. A small length of footpath is proposed within the root protection zone. This will be constructed using a no dig construction. See plan No. Bidd-03-111 for details.
The path to serve the rear garden of Plot 108 is now shown giving access from the west side, rather than from the east through a group of existing trees. Bovis also advised that such paths would be constructed to a low-key, no-dig specification. However, the existing trees themselves to the rear of the garages to Plots 109-111 have disappeared from the plan and should be reinstated.		Tree group 38 is shown for removal in this area. The group consists of multi stemmed sycame and a squirrel damaged beech. A replacement tree is proposed in this rear garden.

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Open Space. Steve Massey (Trees and Woodland Officer)		
The open space corridor along the south side of the site provides the 15m minimum width required, and the latest plan shows this increased, in places, to up to 19/20m. In doing so, this now provides 6m+ for the footpath-plus-grass strip, between the existing tree belt and the property boundaries. This exceeds the corresponding provision on the outline application indicative masterplan; however, it would be beneficial to increase this corridor width still further if possible.		Bovis Homes have increased this width of this wildlife corridor 4.5m in places over the distance agreed in the Outline Planning Application.
As previously agreed, the footpath past the large Oak onto the estate road is now shown adjacent to the shared drive to Plots 11-13 on the western side of the tree, to avoid breaking through the retained hedgerow		No action required
The open space corridor along the western side is 14m at the narrowest point. Despite the limited loss of dwelling units along this side of the layout, this corridor width has not increased over the previous layout plan - although the path itself is now shown closer to the houses and further from the overall site boundary. This again compares equally with the outline indicative Masterplan, although it is considered that much more of the existing grassland could be retained in this area of the site - ideally to correspond with the existing edge of hard surface around the mill building. This would require a substantial reduction in dwelling numbers across the site.		The proposals in this area accord with the Masterplan
The latest amended layout has addressed previous concerns regarding the open space area on the axial avenue route between Pennine Way and The Uplands (Access A and Access E). Specifically, access drives to individual garages and shared parking areas no longer encroach across the ends of this open space.		No action required
We agreed that Bovis will re-consider the alignment of the footpath linking the cul-de-sac at Access D (Plots 87-96) to the internal estate road in front of Plots 75 and 76, to re-route it along the sewer easement towards the play area. This should free up some space and allow the parking court at the side of Plot 89 to be broken up with landscaping.		This area has been revised in line with discussions at the meeting.
As required, the footpath link has now been reinstated past the play area between Ox-Hey Drive and the estate road at Access E.		No action required
Play Area		

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<p>The indication of the play area on the 1:500 scale site layout plan is only 400 sq m, well short of the 600 sq m shown at outline stage. However, the actual detail of layout and provision of equipment is more crucial, and is required to be financially commensurate with the scale of the overall development. The detailed play area by Lappset shows a more informal, fluid design which integrates less formally with the surrounding open space. This approach is considered appropriate, and appears to give a good range of equipment giving opportunities for more adventurous and imaginative play, utilising changes in ground levels to add interest.</p>		<p>The play area has been increased in size to 600sq.m. The play areas been designed to include elements of natural play to help it sit more comfortably within the surrounding landscape.</p>
<p>The equipment to be provided will need to be assessed in closer detail to ensure the overall provision is of value related to the size of the development. In this regard, initial impressions are generally favourable, subject to a couple of amendments/additions:</p>		<p>No action required</p>
<p>1. Replace the embankment slide120067M with the taller version 120068M in order to provide a wider range in association with the small slide forming part of the multiply tower.</p>		<p>The slide has been revised in line with Council comments</p>
<p>2. Add a small swing set (eg 020414M) equipped with 2 toddler cradle swings, again to widen the age range provision.</p>		<p>Additional swings have not been added as it is felt that the basket swing originally proposed is suitable for all age groups.</p>
<p>The play area is not shown fenced. However, it is considered that fencing would be necessary - partly to exclude dogs, and partly to provide a secure area for younger children to ensure they could not wander off unsupervised into the wooded and banked area to the west. Having said this, fencing tightly around the play area itself would not be the best solution in this instance, being rather “standard municipal” in character as discussed at the meeting. Rather, railings along the roadside, the footpath and the western side of the overall area could enclose the play equipment together with its wider grassed context. The aerial runway need not be so enclosed.</p>		<p>Railings have been included around the play space as requested.</p>

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<p>A <u>serious concern</u> is that the target 30m buffer to surrounding dwellings has been significantly and unacceptably reduced with the play area in its currently indicated position. It is essential to correct this, and the fluid layout design of the play area may assist in this respect. It is noted that a buffer planting strip is indicated along the north side of the open space, and this is considered appropriate to assist in reducing disturbance to nearby dwellings, but target buffer distances of approximately 30m will still be required.</p>		<p>The target buffer of 30m has been met on all sides.</p>

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Landscaping. Steve Massey (Trees and Woodland Officer)		
Latest details of landscaping are not comfortably legible on the submitted plans, but it is noted that proposals now address structural planting to the open space areas, and it is understood that there is to be a significant increase in the area of wildflower meadow grassland to be provided.		All plans have been revised.
On-plot landscaping is not shown, but it is not anticipated that such landscaping should generate any fundamental problems when details are received.		See plan No. Bidd-03-100 for detailed landscape proposals
Opportunities should be taken to include tree and shrub planting against the outside of garden walls which present a public highway boundary to rear gardens, to contribute to street scene greening around the development.		Tree and shrub planting has been added where possible adjacent to walls and fencing.
At the meeting, we noted the requirement to provide further planting to break up some of the larger expanses of car parking bays - notably to the side of Plot 89; the parking court off the north side of the central square; to strengthen the street scene on the two roads approaching the west side of the central square; and the car park for the grouped apartment blocks (Plots 122-145).		Planting has been added into the areas suggested.
Central Square		
It is noted that the square remains smaller than the maximum dimensions of that shown on the outline indicative masterplan		The square has been increased in size
Although the outline masterplan also indicated use of the square for allocated parking, it remains the view that this could be a much more attractive, welcoming, user-friendly urban space if it could be designed to be traffic free. It seems that this could only come about by a suitable reduction in total dwellings, bringing a corresponding reduction in parking provision requirements.		As stated in the meeting Bovis Homes strongly disagree wit the idea of such a large central square not including car parking. Car parking will add activity to this area and increase surveillance. Parking is also clearly shown on the approved Master plan.
The layout and detailed design of hard surfacing, tree planting, bollards/barriers, seating (public art?) etc will be crucial to whether this ends up as a high quality focal point urban space for the whole development, with a strong sense of place, or just a car park.		See detailed plans for hard and soft treatments of the central square.

External Comments		Bovis Comments
Crime Prevention. David Elkington Staffordshire Police		
<p>From a crime prevention perspective at least, there appear to be quite a number of positives that can be taken from the revised (February) site layout plan which is encouraging. The unoverlooked parking court/garage area which was roughly where plot 46 is located has gone completely. There is a lot more control on access to the rear of properties with clusters of houses having interlocking rear gardens providing mutual security. Where rear access paths exist, gates located as close as possible to the front building line are by and large provided. Presumably where gates are not shown in connection with certain rear access paths (eg. to plots 189, 197) this is merely an oversight. As an aside, some of the rear access paths seem a poor use of space (eg. plots 178-8, 160-1) with scope for improvement, but I imagine house types determine what is or not possible. To reiterate a previous comment - whilst self-closing gates are good, ideally the additional inclusion of a manual key-operated lock, operable from both sides with keys provided to the few households that are serv</p>		<p>All gates have been added as per comments.</p>
<p>The principle of using planting to protect vulnerable fence lines abutting public space, to create buffer zones to protect certain ground floor windows (e.g.. the connecting footpath between plots 76 and 90 - although from your notes, it appears the footpath may end up being re-routed) or relatively blank gable walls seems to have been employed, which is good.</p>		<p>No action required</p>
<p>Natural surveillance from the properties of the road network and connecting footpaths appears good, and the potential also exists for most of the open spaces and individual car parking spaces adjacent to houses, although this will depend upon the detail i.e. the provision of suitable side windows and avoidance of blank gables.</p>		<p>Additional windows have been added to gables to increase surveillance in a number of locations.</p>

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<p>The inclusion of railings along the footpath boundary between plots 6 and 7 is welcomed, although my preference would have been for 1500mm high. A non-flat topped design should be used whatever. Consideration could be given for similar railings to be used in the south-west corner of the development to border the parking area in front of plots 159-161 running up to meet the rear garden boundary of plot 158. This could provide greater control over the space in front of plots 159-161; improve vehicle security by preventing access from the circulatory footpath whilst still allowing a visual connection to the open space. Certainly for the railings that have been proposed around the apartments blocks (122-145) 1200mm is too low, at least where the parking areas border them on the south and west sides. Again a flat topped design should be avoided.</p>		<p>The railing specification is 1500mm high bow top. Railings have been added to the parking court adjacent to plots 159-161-158 as requested. The railings around the apartment block have been increased in size to 1500mm.</p>
<p>The redesign of the block of houses to the west of the central square seems reasonable with the provision of (lockable?) gates to the parking area that presumably could be secured should the need arise. Plots 63 and 68 would overlook the parking court which would be beneficial and plot 78 would have a direct view of the access area under plot 63. The parking court that serves plots 70-75 still has the potential to attract unwanted attention, although the natural surveillance offered by the revised north-facing aspect of plot 72 may assist somewhat. Improving natural surveillance of the parking area further should be considered. A rumble strip at the entrance to the parking area, suitable signage to lay down some rules as to what the area is to be used for and what is not permitted (e.g. ball games) and planting in the north-east corner could also be considered.</p>		<p>Sign will be installed and maintained by the site management company in this area.</p>
<i>Street Scene / Layout</i>		
<p>The basic approach to design is traditional conservative house types, which could be found any where.</p>		<p>The discussion in the meeting confirmed that traditional house type of a simple style were typical of the local vernacular.</p>

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Plots 149-155 are three storey hipped structures. The roof form and rusticated ground storey is not used locally and should be deleted. The Georgian pastiche fails at ground floor with the asymmetrical central door and two small windows. One door and one large window are required. A panelled door is appropriate for the main entrance, but the subsidiary garage doors should be simple vertical boarded doors.		These plots have been reviewed.
Plots 50-53. (see comments on 149-155). Avoid the dolls house doors		These plots have been reviewed.
Plot 49 large blank gable. Two windows only.		No action taken
There still appears to be too many “over large” relatively blank gables in this development. The introduction of randomly placed windows or blocked windows emphasises that the design is incomplete or unsuitable.		If the house types are viewed as isolated units then there are a number of gables shown. These units need to be viewed as part of the street scene. When viewed in this way there are very few blank gables fronting on to streets.
The design of the central square is unresolved. It appears to be a formless space with some parking. A detailed design is required to show how this area will work.		See detailed plans for hard and soft landscape details.
The northern section of the development has large areas of car parking which do not appear to relate well to each other or to the properties they are serving. Detailed design is required to show how these will function.		This area has been revised
Sections BB, CC, DD show expanses of brick wall / railing fence lining the streets, which are potentially visually unattractive and unfriendly. There is a need to incorporate some variation/planting to improve the street scene.		Boundary treatment have been revised and planting added where appropriate.

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Highways		
Formal comments will follow. It was noted however that tracking information was required.		Full tracking information will be provided with the application. The tracking will be based on a 12m long refuse vehicle as requested by Staffordshire Moorlands District Council.
The urban squares were highlighted as a positive step in the right direction, but needed to adopt a Manual for Streets approach by using building and trees to define and enclose these areas to give them a “sense of place” rather than being junction shaped with dwellings set back.		The built form around all the urban squares has been revised to tighten the massing in these areas.
Trees		
Improvements:		
▫Parking spaces to Plots 12 & 13 have been altered and we were informed at the meeting that the 2 spaces immediately to the north of the large oak tree are now to be omitted altogether.		No action required
▫Houses at Plots 14 & 15 have been significantly moved back away from this Oak.		No action required
▫House at Plot 22 has been moved further from the trees at the rear and the house type changed to avoid a projecting rear wing, thus increasing the usable rear garden area.		No action required
▫Garage to Plot 23 has been relocated outside of the root protection areas (RPA) of the trees to the rear.		No action required
▫We were informed that the retaining wall at the south side of Plot 23 has also been moved out from the RPA, to coincide with “the boundary” between the rear garden and existing woodland belt.		No action required
▫Trees at the side of Plot 90 were now shown as omitted to avoid conflict; these are claimed to be low value/importance trees according to the previous tree survey. However, we will have to take a view on the acceptability of removing boundary trees when the application comes in for a detailed assessment.		No action required
Unknowns/Negatives		
▫Rear access path to Plot 111 is still potentially through trees; exact alignment and construction specification and levels remain unknown, so there is potential for conflict.		Plots 87 & 107 have rear access footpaths which cross under existing tree canopies. These will be constructed using above ground construction in line with BS5837 so root disturbance is kept to a minimum. See plan no ?? for details.
▫No further information is known about the retaining wall between the rear boundaries of Plots 89 & 90.		Retaining wall details are shown on plan No. ??

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<p>▫Amendments to Plot 23 would result in the loss of 2 trees at the end of the group to the north side of this plot which were previously to be retained. Again claimed to be low value/importance and whilst this might be true of them as individual trees, we will need to look in detail at the impact on the wider group of trees and the overall site structure.</p>		<p>The trees that would be lost are detailed in the Midland Forestry Report 2009. None of these trees are located on the boundary to the site and so offer limited screening potential to existing residential properties. Tree 23 is a Pendunculate Oak which the arboricultural report suggests could be relocated if impacted upon by the layout. I suggest this tree is relocated to the rear of the adjacent tree group. Tree group 30 consists of a group of Silver birch trees which are in a state of decline, a number have bark inclusions. Additional planting is proposed within this area. 6 additional trees are proposed along with a native planting which will help screen the new development. This planting will have a much longer life expectancy than the existing trees shown for removal.</p>
Open Space Layout		
<p>▫Previous pinch point where the open space passes Plot 159 has been widened and now provides an 11.5m width to the Plot curtilage (private drive turning head). However, this is still less than the minimum 15m of open space / wildlife corridor secured through the outline permission.</p>		<p>The Outline states that a buffer of 15 metres should be retained along the southern and western boundaries of the site. The proposed buffer in places far exceeds the 15m required expanding to 19.5m in places. There is however a small pinch point adjacent to plot 158 where the buffer is reduced to 13.5m.</p>
<p>▫Previous pinch point on the southern wildlife corridor past Plots 7, 8 and 16 has been eased by widening the footpath and grass strip by a couple of metres. However, there remains concern that this is still a narrow corridor enclosed between the existing woodland belt and, intermittently, the rear garden boundary walls/fences. Although the layout provides the minimum 15m overall width to this corridor (including tree belt) it is strongly considered that this should be increased still further and significantly to provide a more usable and welcoming open space route.</p>		<p>See above with regard to the widening of the buffer strip. The existing vegetation in this area will be crown raised to increase surveillance through this section of footpath. The fencing of the four properties (plots 1,6, 7,&13) that abut this area will be permeable, consisting of hit and miss fencing to a height of 1.5m with 0.3m of trellis. This route is not intend as the main night time access route around the development, pedestrians will use the lit road. Additional windows have been added to the side gables of plots 6, 7 & 13 to increase passive surveillance in this area.</p>
<p>▫Footpath has now been shown following the western and southern open space corridor as requested, with a link out past the large mature Oak between Plots 15 and 16. We were advised at the meeting that this path will in fact run alongside the shared private drive to plots 12 -15 to avoid breaking through the retained hedge line and this is supported.</p>		<p>The footpath has been relocated as requested.</p>

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<p>▫There is now an indication on the plan that this mature hedge will indeed be retained where it lies within the proposed open space.</p>		<p>A section of the hedge will be retain and a section will be translocated within the development.</p>
<p>▫ Footpath link between Ox-Hey Drive and the proposed estate Road 4 past the play area is still not registered on the plan, but we were advised at the meeting that this would be added.</p>		<p>The footpath linking Ox-Hey Drive and estate Road 4 is now shown on the plan.</p>
<p>▫Open space area on the axial route from Access A to E has been increased and the path de-formalised. Also the road approach from The Uplands (Access E) has been amended to direct traffic round to the left rather than straight on, which is an improvement. However, this is then compromised by the intrusion into the end of this space by the two vehicle access drives to Plots 60 and 143.</p>		<p>These drives have been removed.</p>
Concerns and Negatives		
<p>In amending the layout, it is noted that the footpath through the open space on the western side of the site has been relocated further across towards the western boundary. This will further reduce the amount of existing grassland habitat retained in this area and restrict the amount of new grassland to be provided. It also brings the path further into the wooded area therefore creating additional potential conflict with and disturbance to wildlife whilst exacerbating the previously noted issue of gradient of this path into/out of the steep wooded hollow. Although it was acknowledged at the meeting that at this stage this is an indication of the route and that the fine detail of this can be adjusted, it is strongly considered that the incremental reduction of open space width and encroachment of development restricts the opportunities for an acceptable path alignment.</p>		<p>The layout has been revised and the footpath is now further away from the buffer strip. The area of grassland has been increased.</p>

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Play Area		
At the meeting an illustration was tabled giving an idea of the possible direction of play area layout and design which showed good potential, moving away from a “standard” range of equipment provision more towards incorporating site features including ground level changes to develop a facility having more adventurous/interesting play opportunities. Clearly the actual design and level of provision will need considerable more detail as the scheme evolves and will need to ensure a level/value of provision commensurate with the scale of the overall development.		See play area plan for details. This design fulfils the Councils requirements for a JOP/YOP. The Councils requirements for a 30 metre buffer between adjacent dwellings has been met on all sides. Additional native planting has been added adjacent to proposed dwellings which will strengthen this buffer.
Landscaping		
<p>▫ Little further detailed information was provided at/in advance of the meeting. However, there was encouragement that a considerably greater area of wildflower grassland is to be provided, with mention of a potential increase from the previous 1000sqm to a figure of around 3000sqm. This will need to be properly detailed and specified in the full landscape scheme on submission.</p>		The wildflower area has been increased from 1000m to ???m. Full landscape proposals can be seen on plans Bidd-03-100.
<p>▫ A sketch scheme showing potential landscaping of the main central square was tabled; this was also encouraging, indicating tree planting, bollards, sitting area etc. However, some formal parking provision is also shown, and it is suggested that this square would be much better in design and use if such parking could be provided elsewhere, to leave the square traffic-free (but incorporating an emergency vehicle access route if needed, controlled by lockable bollards/barrier).</p>		This formal square has always been shown to include parking; the masterplan shows ?? parking spaces. Bovis Homes strongly disagree with the Councils request for a parking free space as the parking will create activity within the area. This activity will increase the passive surveillance and reduce the likelihood of antisocial behaviour. The space is very large and without added activity could easily become barren, dead space. We have taken account of the Councils concerns and parking numbers have been reduced from our initial proposal.
<p>▫The point was raised that proposed tree planting in particular needs to be realistic in terms of sufficient space for trees to reasonably establish and develop, at sufficient distances from dwellings to avoid conflict and pressure for lopping and premature tree removal. Whilst species/tree form choice will be important, there are still areas of the current layout which would not sensibly accommodate tree planting as indicated without amending to give more space for trees.</p>		Tree planting has been reviewed and the tree canopies shown on the landscape proposals plan shown the tree canopy sizes after a 25 year period. Each species of tree has been carefully selected to ensure it suits its surroundings.

External Comments		Bovis Comments
Crime Prevention		
<p>A number of rear access paths remain. Reducing these to an absolute minimum should be the aim. Gating any that remain at the front of a building line (e.g. garage, house, fence line) would reduce crime opportunities. Whilst self-closing gates are welcomed, the additional inclusion of a manual key-operated lock, operable from both sides with keys provided to the few households that are served by the path would reduce criminal/anti-social opportunity still further and is best practice. Such that the path to the rear of plots 150-156 should be designed out. Whilst the side garden boundary of plot 97 should meet the corner of plot 106 and the gate moved to the front building line of plot 97.</p>		<p>The number of rear access path has been reduced. Any remaining access paths are all secured with self closing gates. The layout has been revised to remove the issues raised.</p>
<p>A number of parking courts still raise concerns in terms of lack of natural surveillance, ownership etc and this should be addressed. There would appear potential to improve overlooking of the parking court adjacent to plots 75 and 76 in a number of ways to avoid the creation of blind spots as we discussed. The parking court adjacent to plots 47 and 48 currently has negligible natural surveillance, which is far from ideal. The creation of the parking area behind plots 83-86 which again will not be overlooked also warrants further thought.</p>		<p>The parking courts have been reduced from our original scheme from six to three. The two remaining parking courts have units which overlook them and additional windows have been added into the gables of units fronting these spaces.</p>
<p>It will be important to ensure that natural surveillance is addressed elsewhere. Examples include providing side windows to overlook parking spaces (e.g. plots 6, 18, 143, 150, 159, 180-181, etc), the more open parking court adjacent to plots 92 and 93, the linking footpath (plot 79) and overlooking the areas of open space. Blank gable walls particularly adjacent to any public accessible space should be avoided.</p>		<p>Additional windows have been added to specific plots to increase natural surveillance.</p>

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<p>The inclusion of railings (such as those in the photo example tabled) separating the courtyard area in front of plots 6-8 from the open space and path would allow privacy for these occupants and prevent an undesirable through route whilst still allowing a visual connection to the open space. Railings could be used effectively elsewhere along this path edge (e.g. between the driveway of plot 1 and the path and extending from the end of the fence at the side of plot 15 beyond where the parking spaces are provided for this plot. The path adjacent to plots 8 and 15 does appear somewhat squeezed in between the fence line and the existing trees. Were more space provided for the path it could assist in terms of safety/fear of crime.</p>		<p>Railings have been used as a visually permeable boundary treatment adjacent to plots; 6&7 and the rear court yard of the apartment block plots 140-145.</p>
<p>External planting could be used extensively to protect potentially vulnerable fence lines where they abut public space (e.g. plots 16, 17, 115, 124, 148, 160 to name but a few), to create buffer zones to protect ground floor side windows (e.g. plots 72 & 93) or relatively blank walls (discourage gathering, totalling, graffiti etc).</p>		<p>Planting has been added to vulnerable fence lines. See landscape proposals plans for details.</p>
Layout		
<p>The layout is considered cramped, which is illustrated by a number of points: additional loss of trees (Plot 23); trees too close to dwellings (e.g. Plots 82 & 87) or insufficient space to sensibly accommodate new tree planting; car parking provision within the main central square; parking bays or access drives arbitrarily encroaching into open space areas (Plots 12, 100, 101, 115, 116) or blocking off what could otherwise be good linkages to allow for fingers of peripheral open space into the development area (Plots 7 & 15) and restricted open space areas producing narrow/minimal open space corridors.</p>		<p>Addressing the concerns of the Council; Bovis Homes strongly disagree that the layout is 'cramped'. ; poor quality trees have been lost to enable the development but additional more sustainable trees are proposed, car parking is shown on the Outline Masterplan in the central square, all parking has been removed from open space areas with the exception of plots 97 & 98 and this area has been landscaped to minimise its impact on the open space and the buffer strip has been increased in width from the 15m requested by the Council.</p>

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<p>There is an overuse of the narrow rectangular footprint, which is often “blocked” in a straight alignment, resulting in an overly uniform grain of development whilst lacking in legibility. Building scale/proportion should respond well to road type to provide for structure and rhythm within the overall layout. Landmark buildings are not apparent and would serve to strengthen the layout’s legibility - refer back to the outline DAY. Plots 115-119 should be reflective of existing neighbouring development. Plots 125-140 require a “re-think”. A courtyard style would assist in breaking up the building’s massing whilst enclosing / integrating areas of parking - refer back to the outline D&A. The focal point should be free of car parking and landscaped accordingly. Shortfalls in privacy distances are not justified by good design and cannot be supported in this respect.</p>		<p>House types have been revised and a more varied house types have been plotted. Landmark buildings have been included; plots 156, 2, 155,49, 44,162,8-10, 198-196, 140-145. Plots 112-115 have been revised to become more reflective of the exiting built form.</p>
Design		
<p>You are already in receipt of the critique of individual house types, where principal points raised concerned scale, proportion and incongruous features. It is not considered that these issues will be overcome through detailing alone. Terrace blocks are not expressed well, with regard to their overall proportioning, coupled with unbroken ridge/building lines. Apartments should be designed as apartments - there is an opportunity to create well designed landmark forms at 125-140, at the focal point and some of the urban squares.</p>		<p>The house types have been reviewed. General comments; the elevations should not be read alone. These elevations for part of a street scene and need to be read as such. Terrace blocks have been broken up with level changes and additional fenestration treatments such as chimneys. The apartment block has been revisited and now acts as a main focal building when accessing the site from the north.</p>
<p>It is evident that significant issues remain, which have not been resolved by the amended layout, notably retaining 200 dwellings. I would re-iterate that it may be necessary to accept a reduction in dwelling numbers to satisfactorily overcome these concerns. Without significant amendment, the scheme is unlikely to receive favourable support from Officers or Members of the Planning Application Committee.</p>		<p>Bovis Homes do not class the number of units as a issue. The outline permission has given consent for 200 units. The number of units in the proposed scheme falls under the consented number.</p>
<p>I have suggested that the next step is to report any amendments to the forthcoming Urban Design Review Panel meeting to be held on the 16th February. Any revisions should be received no later than Monday 14th February.</p>		<p>No action required</p>
Additional Comments from Rachael Simpkin, Staffs Moorlands. 8th February 2011		
Additional Highway Comments		

External Comments		Bovis Comments
□ □Block paving squares need to create more of a sense of place by incorporating additional features (seating / planting) and bringing buildings forward onto the squares to enclose and define place.		The built form around all the urban squares has been revised to tighten the massing in these areas.
□ □Refuse turning capability needs to be tracked for the whole site layout.		Full tracking information will be provided with the application. The tracking will be based on a 12m long refuse vehicle as requested by Staffordshire Moorlands District Council.
□□Advised of technical parking layout issues.		All parking has been tracked and layout amended accordingly.
□ □Need to incorporate measures to prevent vehicles driving through north south pedestrian link.		See landscape plans for barrier details.
□ □500mm overhang strip required on adoptable roads.		Stip added to highway margin.
□ □Removal of build out on secondary access point onto Pennine Road required.		Removed
Comments from Rachael Simpkin, Staffs Moorlands. 1st February 2011		
General Design Comments		
Repeated house type comments		
Fenestration. Need to ensure consistency in header detailing throughout each house type, i.e. same header to all elevations		Standard Fenestration Comments. Bovis Homes propose to spend money on fenestration treatments and detailing that can be seen from public areas. Less detailed fenestration treatments are used on less visible elevations. Fence Key Plan shows the locations proposed for the 'additional' fenestration treatments.
Most of the house types propose large bargeboards, but no indication of material. Should be timber, or preferably some corbelled eaves on most plots.		The majority of properties in the surrounding area have timber or UPVC barge boards. Bovis Homes use UPVC barge boards to reduce maintenance issues.
Scale & Proportions are poor on a number of plots (proportion of roof to elevation) as well as overall width of gables (can these be broken up on the visible elevations with openings or maybe rear outriggers?)		Elevations have been reviewed and gables revised where possible. Additional windows have been added to gables to increase visual interest.
Chimneys required on some plots.		Chimneys have been added to certain plots.
Variety to Front Door designs.		The front door styles are varied
Need to understand how these designs relate to local vernacular and reinforce local distinctiveness		See Design Statement produced by Capita Symonds
Window styles should be consistent throughout each house type		Windows styles do vary on occasion within plots. Money is spent of the publically viewable façade. If a rear elevation is not viewable from a public position the rear fenestration treatment and windows style is simplified.
House Types		

External Comments		Bovis Comments
B-A305		
Consistency of Header Detailing required		See standard fenestration comment above
Roof/Elevation Proportions generally acceptable		No action required
Gable overly wide - can it be broken up?		Windows and detail Introduced to side elevation
Eaves detailing to front/rear elevation needs work (see above)		Eaves detailing has been revised to represent local style
Village Style preferred to Classic Style, but a mix should work		Variation of styles as identified in the street scene
Gable Variant less successful - three windows at first floor looks awkward		This Variant is no longer being utilised
Cill Detailing to Rear/Side Elevations?		See standard fenestration comment above
Consistency of window styles required		See standard fenestration comment above
C-A336		
Consistency of Header Detailing required		See standard fenestration comment above
Roof/Elevation proportions acceptable		No change required
Gable width appropriate		No change required
Eaves detailing requires work		Eaves detailing has been revised to represent local style
Small window to centre of rear elevation looks awkward		Window has been revised
Front Door on Village style is a good alternative to the Classic style		Variation of styles as identified in the street scene
Canted brick cills on Village style are positive features		No change required
Cill Detailing to Rear/Side Elevations?		See standard fenestration comment above
Consistency of window styles required		See standard fenestration comment above
D-A337		
Consistency of Header Detailing required		See standard fenestration comment above
Roof/Elevation proportions acceptable		No change required
Gable width appropriate		No change required
Eaves detailing requires work		Eaves detailing has been revised to represent local style
Cill Detailing to Rear/Side Elevations?		See standard fenestration comment above
One of the few with consistent window styles		No change required
E-Leighton		
Porch on both styles of property looks bulky and awkward (simplify with lean-to roof?)		This is a popular style off house and we would prefer to keep the gable fronted porch
Dormers look awkward, but would need to be considered in the street scene context		No action taken
Side gables quite large and imposing with little relief		The majority of this house type fall within a run of units and associated garages. The gables are not highly visible from public view points.

External Comments		Bovis Comments
Eaves detailing needs work		Eaves detailing has been revised to represent local style
Consistency of header detailing required		See standard fenestration comment above
Cill Detailing to Rear/Side Elevations?		See standard fenestration comment above
Consistency of window styles required		See standard fenestration comment above
F-Richmond		
Dormer window is top heavy and should be much more subordinate in scale		Dormer reduced in size
Consistency of header detailing required		See standard fenestration comment above
Gables overly wide and need reducing/breaking up		Windows and detail Introduced to side elevation
Proportions out of kilter - reduce roof proportions?		No action taken
Dormer of Village style also top heavy and should be more subordinate		No action taken
Cill Detailing to Rear/Side Elevations?		See note
Consistency of window styles required		See standard fenestration comment above
G-C3030		
Ground floor window is too wide in both styles		It is not proposed to amend the window size at this stage -
Consistency of header detailing required		See standard fenestration comment above
Cill Detailing to Rear/Side Elevations?		See standard fenestration comment above
Mini-gable inappropriate, but may add some interest in the streetscene?		This has now been removed
Eaves detailing needs work (as above)		Eaves detailing has been revised to represent local style
Gables are overly wide - need reducing/breaking up		Windows and detail Introduced to side elevation
Consistency of window styles required		See standard fenestration comment above

External Comments		Bovis Comments
H-A326		
One of the least successful designs - how does this reinforce local distinctiveness?		We feel that this design sits well when used as a semi or terrace unit - see street scene
Gables are particularly poor with shallow roof pitch above massive expanses of unrelieved brickwork		There is only one gable end of this house type within the development. Windows have been introduced to reduce the expanse of brickwork
Consistency of header detailing required		See standard fenestration comment above
Cill detailing to rear elevation?		See standard fenestration comment above
Consistency of window styles (front vs rear) required		See standard fenestration comment above
J-A344		
Another unsuccessful design - local distinctiveness?		We feel that this design sits well when used as a semi or terrace unit - see street scene
Gables overly wide with unrelieved expanses of brickwork		Windows and detail Introduced to side elevation
Consistency of header detailing required		See standard fenestration comment above
Consistency of window styles required		See standard fenestration comment above
Cill detailing to rear elevation?		See standard fenestration comment above
J Variant - A344		
Much poorer than the standard J-A344		House type removed
Roof/Elevation Proportions are completely incorrect - significant reduction in roof required with dormer sitting within the roof slope - not halfway between the two		House type removed
Expanse of brickwork between first floor windows and eaves needs reducing		House type removed
Consistency of window styles required		House type removed
Cill detailing to rear elevation		House type removed
Gables overly wide with limited relief		House type removed
K-A457		
Consistency of window styles required		See standard fenestration comment above
Eaves detailing needs work		Eaves detailing has been revised to represent local style
Proportions broadly acceptable although gable overly wide		No action required
Header/Cill consistency required		See note
Village Style seems to work well		See standard fenestration comment above
L-A444		
Reasonably proportioned		No action required
Consistency of Headers, Cills and Window Styles required		See standard fenestration comment above
Does hipped roof work on this? Gable more appropriate? Needs to be considered in its context		Gable introduced but does create a large area of brickwork

External Comments		Bovis Comments
Eaves need work		Eaves detailing has been revised to represent local style
P-A550		
Seems to be too many windows in front/rear elevations		Central window removed
Consistency of window styles, headers and cills required		See standard fenestration comment above
Eaves need work		Eaves detailing has been revised to represent local style
Lean-to adds some interest to the rear		No action taken by Bovis
Dormer sits well within the roofslope of the village style - less successful on the classic style owing to dominance of roof - Reduction?		Village variant to be used
O-A551		
Dominance of Roof?		No action taken by Bovis
Proportions otherwise reasonable		No action required
Consistency of window styles, cills and headers required		See standard fenestration comment above
Rear windows do not work without a vertical break		Rear windows have been revised.
Gables quite wide with little relief		Additional windows have been added where required.
Eaves need work		Eaves detailing has been revised to represent local style
S3-S241		
Side Elevation does not work - it appears that it's been attempted to break it up but window positions are incorrect and the building is generally of a peculiar appearance		Windows positions re-positioned
Front Elevations reasonable and proportions from this aspect look ok.		
Rear elevation seems odd as well with only a central top heavy window above two smaller ones		The central window was used to obtain two single bed spaces within the room so neither of the head boards were under a window.
Consistency of window styles, headers and cills required		See note
Eaves need work		Eaves detailing has been revised to represent local style
S3 Variant - S241		
Better than the other S3 House Type		No action required
Proportions reasonable		No action required
Consistency of window styles, headers and cills required		See standard fenestration comment above
Eaves need work		Eaves detailing has been revised to represent local style
S4-S351		

External Comments		Bovis Comments
Very wide gable which needs reducing or breaking up (do not know whether breaking it up would work through - how does it relate to context on the site?)		These units have been amended to form side access units, creating achieving on the secondary street.
Consistency of window styles, headers and cills required.		See standard fenestration comment above
Otherwise proportions/design seems reasonable		No action required
Eaves need work		Eaves detailing has been revised to represent local style
Plots 65-68		
Proportions seem reasonable		No action required
Consistency in window styles, cills and headers required		See standard fenestration comment above
Eaves need work		Eaves detailing has been revised to represent local style
Plots 69-72		
Impact of Juliet balconies?		No action taken by Bovis
Proportions broadly acceptable, although roof does dominate		No action taken by Bovis
Consistency in window styles, cills and headers required		See standard fenestration comment above
Eaves need work		Eaves detailing has been revised to represent local style
Side elevations show large wide gables - these should be reduced/broken up		Elevations have been revised and broken up where possible.
Plots 125-140		Area re-designed - see site layout
Need to understand how these units sit in context. How do the gables relate to the main elevation?		See street scenes for details
Proportions broadly acceptable		No action required
Consistency again required on window styles, cills and headers		See standard fenestration comment above
Expanse of unrelieved brickwork on rear elevation about doorway needs some attention		Elevation revised
Eaves need work		Eaves detailing has been revised to represent local style
What do the flat roofs serve? - these need omitting or re-designed to incorporate a pitched roof - perhaps lean-to?		These plots have been revised.

External Comments		Bovis Comments
Comments from Rachael Simpkin, Staffs Moorlands. 23rd December 2010		
Summary of Key Issues		
Overall, the submitted details are very disappointing in that the character, grain and sense of place of the outline application's indicative masterplan seem to have been "watered down", resulting in a layout which now seems more uniform, regimented and "over-engineered".		Layout revised.
There are a number of concerns and objections to the reserved matters scheme as submitted, and these are noted below - as far as possible under general subject headings and with reference to specific plan and plot numbers where relevant. However, some issues cross over into more than one subject heading.		Layout revised.
Trees		
Generally, the proposed layout makes provision for the retention of existing trees in accordance with the indicative masterplan and based on the tree survey and report submitted in support of the approved outline application. The existing trees are largely located along or close to the boundaries of the overall application site or within the major open space area on the western side of the site. Therefore, <i>for the most part</i> , there would not be direct conflict between new development and existing trees leading to significant adverse impact on condition and stability of trees.		No action required
However, there are a few notable exceptions to this, where there would be direct and damaging impact on some trees:		No action required
Parking bays to Plots 13 and 16 would encroach within the Root Protection Area of the large mature Oak in front of Plot 15. In addition to the potential root damage arising from construction of the parking spaces themselves, there is a steep sided gully to the north of this tree and it appears that this would be filled in to create a level area for these parking bays, thus greatly exacerbating the damaging impact on roots.		Scheme has been revised to account for these trees.

External Comments		Bovis Comments
In addition, the houses at Plots 15 & 16 are too close to the crown spread of this large Oak, and would be likely to lead to pressure for lopping due to shading-related issues and the tree unduly dominating the outlook from these dwellings. This is the largest, most notable individual tree on the whole site and should be given appropriate space as an important natural feature and to avoid conflict.		These plots have been moved away from the existing Oak tree
The rear garden of Plot 23 extends into a wooded corner of the site, resulting in approximately half the garden area being directly under tree crowns and being relatively unusable; also it brings the rear elevation of the house itself into inappropriately close proximity to the tree crowns, likely to result in tree loss due to issues of shading, oppressive outlook, concerns over tree safety etc.		This plot has been revised and is now out of the canopy of the existing trees.
The garage to Plot 24 would encroach within the Root Protection Area of the tree belt to the rear, leading to damage to roots		This garage has been revised and is now out of the canopy of the existing trees.
The "Preliminary Finished Floor and Site Levels" drawing no. 10098/SK/006 Rev C shows a proposed 2.0m high retaining wall at the rear boundary of Plot 23 and the side and rear boundaries of Plot 24. This would run through a large group of existing trees at this corner of the site, and its construction would lead to extensive damage to and loss of trees.		This retaining wall has been relocated outside of the existing tree canopies.
The access path to the rear gardens of Plots 111 & 112 would pass right through a group of existing trees near the site boundary, where its construction would be likely to lead to root damage.		Construction within tree root protection zones has been kept to a minimum. Where construction needs to take place this has been limited to a footpath with 'above ground no dig construction'.
The house at Plot 90 encroaches well into the Root Protection Area and crown space of existing boundary trees, to the extent that in practice these trees would need to be removed to accommodate this unit.		The layout has been revised and this plot is now outside the existing root protection area.
The "Preliminary Finished Floor and Site Levels" drawing no. 10098/SK/006 Rev C shows a proposed retaining wall between the rear boundaries of Plots 89 & 90/91 which would run through the Root Protection Area of trees at the northern boundary of the site, where its construction would lead to significant root damage.		The layout and retaining has been revised in this area and there are no proposed works within the existing tree root protection area.
Appropriate tree protection conditions have already been imposed on the outline planning permission and will also apply to any related reserved matters approval, so further such conditions are unnecessary.		Drawing No. Bidd-03-081 for tree protection details.
Levels and Sections		

External Comments		Bovis Comments
<p>In addition to the points noted above under “Trees” it is considered that the submitted “Illustrative Site Enabling Earthworks Cross Sections” drawing no. 10098/EW/05 Rev A, together with the “Preliminary Finished Floor and Site Levels” drawing no. 10098/SK/006 Rev C give insufficient information as follows:</p>		<p>No action required</p>
<p>Only 2 sections are given across the site. This results in a lack of existing/proposed ground profile information in a few critical points where there are localised significant existing levels changes. These include the deep gulley at the side of Plot 18 extending towards Plots 13-16; the steeply banked area at the north-east corner of the existing mill building and the general run along the northern boundary (Plots 90-112); the existing balancing pond area in the western main open space; the proposed new balancing lake on the same open space; the proposed LEAP play area; the area of the houses and gardens to Plots 115-119; the area of the houses and gardens to Plots 120, 123 & 124.</p>		<p>9 sections and street scenes have been submitted with the application.</p>
<p>The section drawing is not keyed to show which is existing and which is proposed.</p>		<p>The drawings have been revised and are now correctly annotated.</p>
<p>Open Space Layout</p>		
<p>The areas and disposition of open space are generally in accordance with the indicative masterplan submitted with the approved outline application. However, there are some specific issues which have not been satisfactorily addressed:</p>		
<p>The wildlife corridor following the southern boundary of the site has generally been provided at a minimum width of 15m as requested, including the existing 8-12m tree belt. However there is a significant and unacceptable pinch point at the side of Plot 8 in particular and to a lesser extent Plot 16, where the open grass strip narrows to only 2m. This would not be appropriate for safe, useable amenity open space.</p>		<p>The scheme has taken account of the comments. The buffer is now between 13.5m and 19.5m in width.</p>
<p>Additionally, there is a significant pinch point at the south-west corner around Plot 160 where the total width of the corridor from house corner to site boundary is only 7m, i.e. well below the minimum 15m required. The indicative masterplan submitted with the approved outline application maintained a minimum 15m through this corner.</p>		<p>The scheme has taken account of the comments. The buffer is now between 13.5m and 19.5m in width.</p>

External Comments		Bovis Comments
<p>The open space footpath at the side and rear of Plot 145 drops down and then re-climbs a 1.5-2.0m high bank within an 18m linear run, into and back out of the existing balancing pond, which would give rise to an inappropriately steep path. This suggests again a squeezing of the open space which should be widened at this point to allow the path to remain at the higher level; throughout.</p>		<p>The footpath location has been revised</p>
<p>There is no footpath link shown between Ox-Hey Drive and proposed estate Road 4 past the LEAP play Area.</p>		<p>The footpath has been added</p>
<p>There is no continuation of the peripheral footpath through the southern wildlife corridor open space to link Road 1 with Road 12; this should also include for a footpath link from the peripheral path, past the big Oak tree and out onto the estate road in the vicinity of Plots 185/189.</p>		<p>The footpath has been added</p>
<p>There is now no indication on the layout plans or landscape plans of the retention of any part of the significant existing hedgerow running along the gulley adjacent to the big Oak tree on the open space alongside Plot 18 running towards Plots 13 & 14. This was an important consideration at outline stage.</p>		<p>A hedge translocation document has been included with the application.</p>
<p>LEAP Play Area</p>		
<p>The submitted details for the LEAP show that the size of the play area and the extent and range of equipment proposed is not commensurate with the value of off-site play area contribution which would be generated by the proposed development if play provision was not to be provided on-site, i.e. the developer should provide a play area on site to the equivalent value arising from a bedspace calculation for the development as if play provision were to be located off-site.</p>		<p>The play areas has been re-designed and is 600sq.m with a 30m off set from any adjacent dwellings.</p>
<p>This would enable the provision of a larger play area with a more extensive range of equipment catering for a wider age range.</p>		<p>The play areas has been re-designed and is 600sq.m with a 30m off set from any adjacent dwellings.</p>
<p>Proposed Landscaping</p>		
<p>The reserved matters application includes a detailed planting scheme which essentially provides standard on-plot shrub and tree planting (mainly ornamental/garden varieties) to frontages and where rear garden boundaries are set back from edge of highway.</p>		<p>No action required</p>

External Comments		Bovis Comments
The “boundary lines” marked on the 1:250 scale detailed planting plans are confusing and should be omitted as they make it difficult to interpret the proposed planting.		The drawings have been cleared of unnecessary lines.
However, there is very little new landscaping proposed for the main structural open space areas where there are significant opportunities to add to the visual and ecological value of these areas, with much more use of native species:		The surrounding open space areas have now been landscaped.
▫The open spaces between Plots 24 & 25, Plots 27 & 28, and to the side of Plot 30, would benefit from native shrub/thicket planting to add interest, and particularly against the enclosed boundaries of these sites (but not across the open road frontages) in order to discourage ball games against house walls and garden fences.		Buffer planting has been added to all open species pocket parks
▫An informally meandering path along the southern wildlife corridor could be echoed by a few build-outs” of native shrubs against and feathering into the existing woodland belt boundary, to add visual interest and to design away from a long, straight sided linear open space corridor.		See landscape proposals plans
▫Tree and shrub planting in the south-west corner (behind 4 & 6 Dee Close and 8, 10 & 12 Bollin Grove) should be required to replace existing trees in this area which have been crudely lopped.		See landscape proposals plans
▫The only landscaping proposals relating to the open space are for some indicative areas of wildflower seeding and bulb planting. However, it is considered that given the overall area of open space and the loss of existing grassland of SBI quality to accommodate development, the area of wildflower seeding and subsequent meadow management should be significantly increased, perhaps by 3 or 4 times that currently proposed, at the expense of “cultivated turf” which appears to be proposed for the majority of the grass areas on the open spaces.		There is over 3000m2 of wildflower seed proposed within the scheme.

External Comments		Bovis Comments
<p>The creation of a visual and pedestrian through-route from Access A to Access E, whilst precluding direct through access by vehicles, was a key design concept of the indicative masterplan layout. Whilst this concept has been carried forward into the reserved matters layout, the detailed design has now resulted in a more engineered character with extensive car parking much more prominent, and a reduction in greenspace. This again is to the detriment of the scheme, “watering down” the original strong design elements, as follows:</p>		<p>The scheme has been revised to take account of comments.</p>
<p>▣ Entry to the development from Access E (The Uplands) would be met by a virtually continuous rank of frontage parking for Plots 82-87, and the parking to the apartment block (Plots 125-140) would also be more prominent.</p>		<p>The parking solution in this area has been revised.</p>
<p>▣ The road from Access E now continues in a formal standard highway format beyond the T-junction at the apartment block, giving a perception of a vehicular through-route. The right-angled bend for all traffic shown on the outline masterplan would give a better distinction between vehicular and pedestrian/open space zones.</p>		<p>The layout has been revised to remove the perception of a vehicular through route.</p>
<p>▣ The central non-vehicular section fronting Plots 141-143 is now significantly shorter and narrower than that shown on the outline indicative masterplan, with a more formal path layout that would continue the precise line of the adjacent highway. This would simply create a short stretch of “grassed highway”, rather than take the opportunity to define a more informal open space character which would reinforce the no-through route for vehicles whilst maintaining visual and pedestrian permeability along this main axis.</p>		<p>The scheme has been revised to take account of comments.</p>
<p>▣ There are fewer trees shown on the southern section of this axial route (i.e. from the central open space section down to Access a off Pennine Way) compared with the outline masterplan, thereby reducing the linking character of a green visual through-route.</p>		<p>Additional trees have been added in this area.</p>

External Comments		Bovis Comments
<p>The “central square” has been significantly reduced in size (57m x 25m between opposite building elevations on the outline masterplan but now only 46m x 21m on the reserved matters layout), and there is no tree planting shown at all - just a few small areas of groundcover shrubs to some plots together with some grassed frontages on the northern side which are probably not the most appropriate treatment in this part of the site. The result is that the character of a small urban square providing a central focal point for the whole development with trees, perhaps some sitting areas and a strong sense of place has now been lost, to be replaced by a car park.</p>		<p>The square has been increased in size.</p>
Comments from Arne Swithenbank, Staffs Moorlands. 16th December 2009		
<p>Comments relate to Pegasus Plan BIR.2978_25-1 As things stand I feel Area D could not reasonably be counted in as accessible open space. I feel I must also at this stage reserve judgement on area A in respect of those parts that may be in the ravine dealing with water balancing etc. To arrive at a working figure for costings purposes i can only really suggest at this stage that the way forward is to discount a portion allowing for the ravine - it's not as much as one third of the hectare but could be 20 to 25%. Once more is known about the detail of this landscape and how it has also to function for drainage purposes we may be able to assess this differently.</p>		<p>The Public Open Space area plan has been revised omitting the unusable open space areas as highlighted by Arnie. The scheme provides 13,154m2.</p>
Comments from Rachael Simpkin, Staffs Moorlands. 23rd December 2010		
<p>Comments from David Elkington, Architectural Liaison Officer, North Staffs Police.</p>		
<p>The requirement for a Design and Access Statement as set out in Section 6 of the Communities and Local Government publication ‘<i>Guidance on Information Requirements and Validation</i>’ published in March 2010 contains the following paragraph:</p>		<p>No action required</p>

External Comments		Bovis Comments
<p>132. PPS1 makes clear that a key objective for new developments should be that they create safe and accessible environments where crime and disorder or fear of crime does not undermine quality of life or community cohesion. Design and access statements for outline and detailed applications should therefore demonstrate how crime prevention measures have been considered in the design of the proposal and how the design reflects the attributes of safe, sustainable places set out in Safer Places- the Planning System and Crime Prevention (ODPM/Home Office, 2003).</p>		<p>No action required</p>
<p>Staffordshire Police do not believe that the documentation submitted demonstrates that crime prevention measures have been adequately considered or that the design proposal satisfactorily reflects the attributes of safe, sustainable places as set out in the <i>Safer Places</i> document.</p>		<p>The scheme has been significantly revised since these comments were made.</p>
<p>In terms of one attribute 'Access and Movement', safer places are defined as those "with well-defined routes, spaces and entrances that provide for convenient movement without compromising security". Concerning another attribute 'Structure' safer places are defined as those "that are laid out so that crime is discouraged and different uses do not cause conflict". For another attribute 'Surveillance' safer places are defined as those "where all publicly accessible spaces are overlooked". Throughout the proposed layout there are plenty of examples where routes could compromise security, where crime (and anti-social behaviour) would not be discouraged, and where natural surveillance would be poor.</p>		<p>The scheme has been significantly revised since these comments were made.</p>
<p>Looking at 2 particular clusters of houses within the proposed development demonstrates the contrast between (reasonably) good design and poor design in terms of crime prevention.</p>		<p>The scheme has been significantly revised since these comments were made.</p>
<p>The cluster comprising plots 175-180 adheres to the guidance within the DfT document '<i>Manual for Streets</i>'. Paragraph 5.6.1 (page 56) states "<i>The basic tenet is 'public fronts and private backs'. Ideally, and certainly in terms of crime prevention, back</i></p>		<p>The scheme has been significantly revised since these comments were made.</p>

External Comments		Bovis Comments
<p>The cluster comprising plots 39-59 possesses poor crime prevention design elements. There would be only 2 plots (43-44) where potential burglary offenders would be restricted to approaching the property from the front where they would be more likely to be seen. Offenders usually prefer to operate at the rear where they are less likely to be seen. Unfortunately, for the remaining plots, the rear access routes and parking court would allow potential offenders to access the rear garden boundaries. The concept of interlocking rear gardens is completely absent. Furthermore, the open alleys between plots 40 and 41 and between 59 and 40-42 would undermine the defensible space of the cluster and would be likely to be used as through routes or shortcuts by anybody who so chose. Since the alleys and parking court area would not be identified as belonging to anyone, natural self-policing would be less likely to occur. This could encourage littering, graffiti, and anti-social behaviour in a number of forms. As an area for youths to congregate, this area would tick many boxes -</p>		<p>The scheme has been significantly revised since these comments were made.</p>
<p>accessible, a number of escape routes, hidden from view</p>		
<p>In terms of parking, where in-curtilage parking is not provided, best practice would suggest that parking should be located in areas that are well overlooked and where provision is close to owners' homes. Whilst it might be argued that the parking court at the centre of plots 39-59 would be close to owners' homes, given that it would be surrounded by an 1800mm fence and the 2 properties at the entrance would effectively have blank gable ends, it certainly would not be well overlooked. This would make vehicles parked therein vulnerable particularly given the through route situation. Furthermore, this enclosed space would have the potential to introduce conflict as it could be used for footballing.</p>		<p>The scheme has been significantly revised since these comments were made.</p>

External Comments		Bovis Comments
<p>The poor design elements are replicated around the proposed development. The parking courts serving plots 100-105, 96-99 and plots 76-78 would not be overlooked. Houses adjacent to them would have blank gable walls facing the parking courts. In fact, blank gable walls seem to be a recurrent theme throughout the site. There would be a short connecting alley between the overlooked parking courts serving plots 76-78 and 100-105. This locality could again prove attractive to local youths as a place to gather (accessible, an alternative escape route, hidden from view) and potentially a source of conflict.</p>		<p>The scheme has been significantly revised since these comments were made.</p>
<p>The ability of potential offenders to approach the rear garden boundaries of properties unhindered either down rear access footpaths or directly, appears commonplace throughout. The rear access footpaths serving plots 181-184 and plots 165-171 are notable examples. The rear access footpath serving plots 189-191, 199 and 200 would undermine a cluster of houses that demonstrate the desirable mutually secure interlocking rear garden approach. More thought to the design could surely have completely eliminated the need for the rear access footpath here, probably resulted in larger gardens and more efficient use of land - principles that could undoubtedly be applied elsewhere.</p>		<p>The scheme has been significantly revised since these comments were made.</p>

External Comments		Bovis Comments
Other examples of poor design in terms of crime prevention include the unnecessary linkages to the rear of plot 143 and plots 149-153. The latter also features an undesirable gap between the pair of double garages, which would lend itself to gathering/nefarious activity. Why was a single quad garage (like that serving plot 173-4 and 179-180) not considered instead? The orientation of units 113-114 at the gateway entrance from Carriage Drive presenting a blank gable wall, side/rear garden fencing and with communal (?) space to the side of unit 113 appears unsatisfactory. Rotating the plots would seem to offer more scope to incorporate the communal (?) space into gardens, make them more secure, and offer greater natural surveillance at the entrance. The area comprising units 6-9 has the potential to be identifiably private under the control and ownership of the occupants. The fact that anyone would be able to wander to or from the adjacent open space through this area would undermine this. The use of attractive railings to separate the two could easily		The scheme has been significantly revised since these comments were made.
resolve this.		
On a more positive note, the positioning of the L.E.A.P play area would appear to be well considered, visible and accessible, yet not intrusive. In addition, the footpath link from The Uplands is short, straight and wide with opportunities for natural surveillance designed in.		No action required
However, overall Staffordshire Police has some serious misgivings about certain design elements as detailed above. The poor features identified are among those which commonly generate problems within the community. As a final point, it is worth noting that <i>“Crime prevention can be a material consideration in the determination of planning applications”</i> (Safer Places - page 49		The scheme has been significantly revised since these comments were made.
Comments from Mark Preece, Countryside Officer, Staffs Moorlands 2nd November 2010.		
Summary		
It should be a condition of planning permission that:		
▫A detailed plan of mitigation and compensation should be produced to avoid adverse impacts on the bat colony identified. Measures must include an application to Natural England for a licence to enable the works to proceed that must include:		Our Natural England Licence application details the mitigation measure proposed. See attached licence document.

External Comments		Bovis Comments
□□□The design and location of an alternative artificial bat roost before any demolition works occur.		See NE Licence
□□Appropriate phasing of works to reduce potential impacts on bats.		See NE Licence
□□Lighting should be designed and located so that it does not impact adversely on foraging or commuting corridors that could be used by bats.		The lighting scheme will be deigned to minimise light pollution into surrounding woodland buffer.
□Full details of measures for bats should be submitted to the Planning Authority for approval.		See NE Licence
□A further survey should be carried out to check for the presence of badgers before demolition and clearance work is carried out. If required appropriate mitigation and compensation measures must then be implemented.		A further survey has been carried out and more setts found. Our Natural England Licence and update report will be forwarded in due course.
□Site clearance should not be carried out during the bird nesting season from 1 st March to 31 st August inclusive. All birds their nests, eggs and young are protected from killing or injury under the Wildlife and Countryside Act (1981) as amended. Reason: <i>To safeguard legally and European protected species as required under Planning Policy Statement 9 and The Habitats and Conservation regulations 2010</i>		No site clearance will be carried out within the bird nesting period without the supervisions of a suitably qualified ecologist.
□Further details of how and where species rich grassland will be created on site should be provided. Details of the establishment and management of created wildflower areas should be provided. The areas of wildflower grassland should be considerably expanded from those detailed on the landscaping plan, in particular in the vicinity of the wildlife corridor. Reason: <i>To compensate for the loss of species rich grassland and hedgerow habitats UK and Staffordshire BAP priority habitats as required under Planning Policy Statement 9.</i>		See landscape proposal plans for details and locations of wildflower areas. There is over 3000m2 of wildflower grassland proposed on the site.

External Comments		Bovis Comments
<p>▣A detailed plan shall be submitted for the creation of hedgerows and species rich grassland off-site by the developer. The principle of creating at least double the grassland area lost though the development should apply. Details of the location and methods of creation of compensatory species rich hedgerow and grassland should be provided. Compensatory off-site provision for the loss of habitats in particular the grassland and hedgerow habitats will be under a section 106 agreement. Reason: <i>To compensate for the loss of species rich grassland and hedgerow habitats UK and Staffordshire BAP priority habitats as required under Planning Policy Statement 9.</i></p>		<p>See landscape proposal plans for details and locations of wildflower areas. There is over 3000m2 of wildflower grassland proposed on the site.</p>
<p>▣Prior to the commencement of development, a more detailed landscape management and maintenance plan shall be submitted to and approved by the LPA, giving details of proposed maintenance, management and development, including timescales and delivery mechanisms, for all landscaping and wildlife habitats within the various public open spaces and shared streetscene across the site. Reason: <i>A landscape maintenance and management plan was required as a part of condition 21 under the outline planning permission for the development.</i></p>		<p>A landscape management plan has been produced and will be submitted in due course.</p>
Footpath Link		
<p>None of the plans show details of the proposed footpath link between Oxhay Drive and the development across the wooded area of informal open space. Further details of the footpath location width and surfacing should be provided to the Planning Authority for approval</p>		<p>This footpath has now been added</p>
Ecological		
1.Bats		
<p>The bat colony is significant and subject to statutory protection that will necessitate licensed intervention only. An alternative bat roost approved for the colony will need to be in place prior to any authorised demolition. A licence will need to be obtained from Natural England to enable works to proceed.</p>		<p>See NE Licence</p>
<p>Details of the proposed location of alternative artificial bat roosts and bat box locations should be submitted to the Local Planning authority for approval. In addition demolition of areas of the Mill where there are structures that have the potential to support bats must be carried out by hand.</p>		<p>See NE Licence</p>

External Comments		Bovis Comments
Lighting should be designed and located so that it does not impact adversely on foraging or commuting corridors that could be used by bats. Full details should be submitted to the Planning Authority for approval		The lighting scheme will be deigned to minimise light pollution into surrounding woodland buffer.
2.Badgers		
Previous ecological surveys indicated that a located badger sett was not to be in active use. Given the length of time since the initial ecological survey a further survey should be carried out to assess if badgers are present before any development work is carried out. Appropriate mitigation and compensation will be required if badgers are found to be present.		A further survey has been carried out and more setts found. Our Natural England Licence and update report will be forwarded in due course.
3. Wildlife Corridor		
The 15m wide width of the corridor along the southern site boundary as detailed in the proposed site layout (Drawing No 30246) conforms to the requirement of informatives in the granting of outline permission		This wildlife buffer has been increased in areas up to 19.5m in width.
At some points this wildlife corridor is too small, in particular in relation to plot 23 and 24. Properties are placed within a metre of adjacent trees. The design should be altered to create a wider wildlife corridor at this point.		This wildlife buffer has been increased in areas up to 19.5m in width.
The wildlife corridor is only 5m wide adjacent to plot 160. The width of the wildlife corridor should be extended to 15m at this point to reflect the advice issued in the informative attached to the outline planning permission (10/00937/REM_MJ).		This wildlife buffer has been increased in areas up to 19.5m in width.
4. Grassland Habitat		
The open space areas in between plot 24 and 25 and in between plot 27and 28 are relatively small (20 square metres). These areas are too small to offer realistic recreation opportunities. The biodiversity value of these areas could be increased by scrub planting from the edge of the site, with an irregular interface along its eastern edge. A mix of locally native scrub species such as Guelder Rose (<i>Viburnum opulus</i>), Gorse (<i>Ulex europaeus</i>), Hazel <i>Corylus avellana</i> , Blackthorn (<i>Prunus spinosa</i>) or Hawthorn (<i>Crataegus monogyna</i>)		This areas has been revised
5. Grassland Areas Both On and Off Site		

External Comments		Bovis Comments
<p>The Environmental Statement that provided to support the outline planning application for the site indicates that the grassland area amounts to 2ha. Page 10 of the botanical report included in the Environmental Statement indicates that the grassland is of moderate conservation value.</p>		<p>No action required</p>
<p>Staffordshire Sites of Biological Importance (SBI) grading criteria indicates that where a grassland is 0.25ha or and is referable to an MG6 or MG10 National Vegetation Classification (NVC) type then it meets the criteria to be designated an SBI. Where mosaic habitats occur that are 0.5 ha or more on a site and individual habitats meet 80% of the relevant SBI criteria then a site can be designated an SBI</p>		<p>No action required</p>
<p>Area 4 is 0.2ha and is referable to NVC type MG10 and is contiguous with area 1 at 0.3 ha referable to NVC type MG6. Together this grassland block meets SBI designation criteria based on being referable to an NVC type while the plant community present is relatively poor. (Area 5 at 0.2 ha is referable to MG10 and area 1 to MG6).</p>		<p>No action required</p>
<p>Existing semi-natural grassland areas on site therefore potentially meet relevant criteria to be designated as Sites of Biological Importance. Loss of this semi natural habitat would result in local loss of biodiversity. Off-site provision by creating larger areas of species-rich grassland or hedgerows would help compensate for the loss of grassland on the site. The potential for compensatory habitat creation at nearby Biddulph Grange Country Park should be explored. A detailed management plan as part of a section 106 agreement should be produced by the applicant</p>		<p>There is over 3000m2 of wildflower grassland proposed on the site.</p>

External Comments		Bovis Comments
<p>The grassland areas show moderate diversity and include areas of damp or marshy grassland merging to scrub. Compensatory landscape proposals indicate 1120m² of wildflower meadow is proposed, 4,335m² of turfed areas and 7270m². A greater proportion and area of wildflower meadow should be created within the development. In particular within the proposed wildlife corridor along the southern and western boundary of the development. At least 5,000m² of the current grassland within the site meets Site of Biological Importance (SBI) criteria. Greater detail regarding the creation and maintenance of compensatory species rich grassland within the site is required. A seed base of low fertility is required for the establishment of species rich grassland areas. A fertile soil bed will just cause vigorous growth of a few grasses and 'weeds'. A reduction of soil fertility by stripping off the top 5-10cm or so of topsoil is required before lightly raking and rolling the soil to produce a seed bed. Further details of where and how species rich grassland will be developed using appropriate</p>		<p>There is over 3000m2 of wildflower grassland proposed on the site.</p>
<p>Grassland maintenance could be relatively low with an annual hay cut in September to 40-70cm. Full details should be provided in a comprehensive Landscape Plan that includes a five year establishment and maintenance timetable.</p>		<p>See Landscape Management Plan for details.</p>
<p>6. Hedgerow habitat off - site provision</p>		
<p>Hedge planting shall be carried out off-site to compensate for the loss of hedgerow as a result of the development. A species rich hedgerow should be planted. The planting mix for hedgerows should include native local species typically occurring in hedgerows in the Staffordshire Moorlands</p>		<p>Hedge planting totalling</p>

External Comments		Bovis Comments
Planting and aftercare advice is provided Brooks and Agate (2005) in <i>The BTCV Hedging a practical handbook</i> . Planting some standard trees within the hedge line should also be considered such as <i>Fraxinus excelsior</i> or <i>Quercus</i> species as this will significantly increase the biodiversity value of the hedgerow in the long term. It may be possible to diversify the field layer base of the hedgerows through appropriate planting and management. Details of possible management is provided in Gilbert & Anderson (1998)		The landscape proposals show; 165m2 of native buffer planting, over 250 lin metres of native hedging and Bovis Homes are also translocating a 68lin metre length of species rich hedge.
7. Long term management and maintenance plan.		
The developer will need to produce a long term phased maintenance plan for the site to include informal open space areas wildlife habitats therefore the following condition should be applied to the planning permission;		A landscape and ecological management plan has been produced and will be forwarded in due course.
"Prior to the commencement of development, a landscape management and maintenance plan shall be submitted to and approved by the LPA, giving details of proposed maintenance, management and development, including timescales and delivery mechanisms, for all landscaping and wildlife habitats within the various public open spaces across the site."		A landscape and ecological management plan has been produced and will be forwarded in due course.
8. Sustainable drainage issues		
Details of a drainage plan incorporating sustainable drainage techniques should be produced for the site. Details of how the biodiversity value of how the indicative balancing lakes and swales will be maximised must also be provided.		A landscape and ecological management plan has been produced and will be forwarded in due course.
Comments from Jane Curley, Principle Planning Officer, Staffs Moorlands 2nd November 2010.		
My overall comment is that this site offers great potential to secure a very high quality development. I think that with a little more thought and imagination we can achieve a really good scheme here.		The scheme has been some significantly revised since these comments were issued.
Entrance off Carriage Drive		

External Comments		Bovis Comments
<p>The two parking spaces are not appropriate at this gateway entrance. Please reconsider. Thereafter I like the way the buildings follow the road and the block of three angled to the road. However once we reach the courtyard the garage block provides a poor vista. The courtyard needs further thought both in terms of an 'entrance' and to provide defensible space and sense of enclosure within. Consideration should be given to reducing the amount of hard standing. Good quality materials and detailing of hard surfacing will be critical within the courtyard.</p>		
<p>I am not convinced about the off shoot parking area to Plots 13-15 in terms of design and natural surveillance - without the parking allocation not sure who this serves? You will need to explain how it relates to the residents it serves.</p>		
<p>Entrance off The Uplands (cul de sac)</p>		
<p>Very engineered - possibility of reducing this? Again you will need to explain how the two parking areas relate to the residents they serve and how a sense of ownership will be achieved. These parking areas are relatively large and I would like to see hard and soft landscaping proposals to demonstrate how these areas can be successfully designed and integrated into the development.</p>		
<p>Entrance off The Uplands</p>		
<p>My comment here is that the layout as drafted provides quite a poor entrance to the site. It would result in a very car dominant landscape (Plots 31-35 and 50-69). The suggestion at outline stage was that this north/south route would have strong street character and I think that this is the right approach. The buildings need to define the road in a much stronger manner. See, for example, the outline scheme for plots 50-69. Here the buildings define the street providing focus and legibility. This arrangement also enables the parking areas to be broken up more successfully. It is not clear how the space to the south of plots 50-69 would function and this needs to be explained. You could look at possibly pulling apartment block (36-39) further to the west to frame the junction and again provide focus and sense of place.</p>		
<p>To the west of the entrance the parking/garaging area to plots 27-30 is too engineered and needs to be reconsidered.</p>		
<p>Main Axis Road from The Uplands to Pennine Way</p>		

External Comments		Bovis Comments
This area has the potential to provide strongly defined street character. We would want to be convinced that the indicative tree planting can be achieved as this will be key to the success of what was described as an 'avenue' in the DAS. Also sections, house designs, levels, hard surfacing, boundary treatment will be very important so we can see how it sits in context. There are some shortfalls in space standards here - distance between facing elevations for example, but this may work. We would need to see the further information as indicated. Street scenes (and sketch up or similar if you have it) would be a useful tool too. Possibility to pull Plot 122 further south to frame the junction. Throughout this route, provision and design of focal buildings will be important to provide legibility/sense of place.		
Plot 91 - if the garage (to the west) and house were handed this would reduce the amount of hard standing required. It would also provide more natural surveillance of the open space/footpath if fenestration were to be incorporated in the gable elevation.		
Boundary treatment alongside plots 90, 91, 84, 83 and beyond will be important and this detail should be provided with the application.		
Plot 4-6, 70-76, 87, 89, 90, 169, 113-116, 126-128, 133, 142, 144, 161-168, 188, 189, 192-194 - garden areas too small.		
Plots 85/86 - revised subdivision should help garden size.		
Plots 104-108, 126-128 and 161-164 - design/landscaping needs to ensure not car dominant.		
Plots 92-96, 104-108 - gardens too small for 2.5/3 storey 3 bed town houses likely to be attracting families.		
Plots 119-122 - consider pulling units forward to define the junction and road.		
Garages to 121/122 - awkward set back and likely to interfere with 45 degree line.		
Plots 118 and 112 - too cramped. These are large 5 bed properties. The space about the building needs to reflect this.		
The long narrow garages to 128, 130 and others - design and amenity issue. We would want to see elevations.		

External Comments		Bovis Comments
Plots 137/138, plots 148-150 and 143-144 - drive/parking/garaging area over engineered and needs rethinking.		
There are some shortfalls in distance between facing elevations but as I say above this may work. I would need to see the designs, levels, sections etc to make that judgement.		
Main Entrance from Pennine Way		
This is also an important gateway in to the site. The car parking bays provide poor definition to the street and need to be reconsidered. Scope to bring plots 124 and 125 closer to the road.		
Land of Oxhey Drive		
Over engineered - please revisit. Please ensure 14m is achieved between 197 and 199.		