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To: [Curley, Jane](#)
Cc: [Planning Comments \(SMDC\)](#)
Subject: SMD/2021/0694 - Werrington Y.O.I., Ash Bank Road, Werrington
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Jane

The proposed alterations to the existing main site access off Ash Bank Road would require the removal of a number of prominent mature trees in this part of the site. The application arboricultural report correctly regards this as necessary/unavoidable to accommodate the new access arrangements as proposed – but states in its conclusion that the development has been “informed” by the tree survey, although it seems more that a layout has been designed and the arb report then acknowledges its inevitable impact, which is not the same thing. This tree loss at this location would have detrimental impact on visual amenity, and whilst the layout has spatial opportunity to accommodate mitigatory replacement planting along the Ash Bank Road frontage, it would be many years (a few decades) until this achieved a comparable level of visual presence and amenity. However, it is noted that the site is an allocated housing site in the adopted Local Plan, and therefore development is to be anticipated; if it is that there are no acceptable/viable alternatives available to the position/arrangements for site access (both to the new housing development and the existing YOI facility) then yes, such tree loss would be unavoidable and this is something for the LPA to take into account in the overall planning balance. If the need for and benefits of the development are considered to outweigh such tree loss (whilst also factoring in mitigation) then there may arguably be no overriding conflict with Policy NE2.

The latest revised layout plan (Revision AA) has amended the proposed shared private drive and parking arrangements for Plots 1/2/3 since the arb report was written. This drive now results in a greater encroachment into the north and north-east quadrant of the Root Protection Area (RPA) of a large mature Category A Sycamore (T1), compared to the previous lesser encroachment (but still an encroachment) into the north-west quadrant. As this revision post-dates the arb report, its impact has not been specifically addressed, although the arb report proposed that the previous impact would be made acceptable by use of manual excavation and root pruning under arboricultural supervision. To my mind this approach is not appropriate as it still involves excavation and root severance (and of a greater amount under the revision) whereas the guidance in BS 5837 advises a default position of structures being located outside RPAs. If the shared private drive access point onto the highway were to be moved c.12 – 15m further east, this should enable an alignment which avoids encroachment into the RPA, albeit it may also require some corresponding adjustment to the position/geometry of the bus stop pull-in.

The access arrangements to the front and side of Plots 17 – 22 have also been further amended subsequent to the arb report, and in fact now avoids footprint encroachment within the RPA of tree T18 a mature Oak. However, it is noted that this tree is situated at the bottom of step bank, and the earthworks required to deal with this significant change in levels to accommodate the private drive southwards off the end of “Secondary Street” immediately past the RPA of T18 could themselves have harmful knock-on effects within the RPA beyond the edge of the footprint of the private drive carriageway. I cannot see that details of how this change in ground levels would be handled have been submitted and at the least we could do with large scale sections and/or existing/proposed levels information to demonstrate how Plots 21/22 and 31, and the

Primary street and Secondary Street/private drive would relate to the more notable ground levels changes in this part of the site. It may be that the alignment of the Secondary Street and private drive leading past Plots 17-22 would be better moved a fair bit further westwards from the RPA of T18 in order to accommodate any peripheral engineering works associated with the levels changes, and this in turn may also produce a better alignment at the interface between the secondary street and the private drive, which at present appears quite awkward.

I have not been able to find information to clarify whether the drainage(?) easement ("TFR") rear of Plots 32-37 etc is existing or proposed. If a new proposed feature, is there any reason it could not be slightly re-aligned to avoid encroachment into RPAs of existing trees and hedges? (but not an issue if TFR is existing). Similarly for the footpath link between the turning head at Plot 38 and Ash Bank Road.

Other than the issues noted above which, with the possible exception of the main development site/YOI access arrangements appear to be readily capable of minor amendments to address, the main housing layout including dwelling footprints, adoptable highways and private drives and parking areas, are all clear of RPAs and would also avoid significant indirect issues in relation to existing trees such as shading, overbearing impact etc.

In terms of visual impact, the proposal would introduce a suburban housing development into a current open field site in a prominent location alongside the main road through Werrington. This would fundamentally change the landscape character of the site itself (agricultural fields to residential estate) and the development would be prominently visible and bring about a medium to high magnitude of change into currently extensive views into and beyond the site as viewed from the elevated linear viewpoint of Ash Bank Road, leading to initial major/moderate adverse visual impact, becoming moderate adverse after the establishment and development of new landscape planting. This linear viewpoint along Ash bank Road is, predictably, where the greatest magnitude of change and greatest visual impact would be experienced from; the application documents include a Landscape and Visual Impact Assessment which also considers potential impact from a number of other representative publicly accessible receptor locations generally in an arc from east to south to west around the site at varying distance from the site. However, in these views, due to the combined effects of distance, intervening topography and intervening vegetation and/or existing built structures, visual impact would generally be none to minor, with any glimpsed views of the development seen in the context of similar glimpsed views of the existing settlement and the more visually prominent Y.O.I. Even the views seen from Ash Bank Road would not be seen as isolated development in undeveloped open countryside as there is already considerable visual influence of a semi-urban character arising from existing dwellings, shops and of course the Y.O.I.

Against the adverse impacts noted above, it must be acknowledged that both parcels of land making up the application site are located within the village development boundary where further development would in principle be acceptable, and furthermore both land parcels are allocated for residential development in the adopted Local Plan. The inevitable visual effects and impact generally characteristic of a major residential development have therefore already been considered acceptable for this combined site.

The application includes a landscape masterplan which in fact is a fully specified landscaping scheme in terms of proposed species, planting sizes and numbers/densities. The planting

scheme contains an emphasis on native species – especially within the “ecological zone” rear of Plots 1-3 and as dense native thicket and heavy standard/semi-mature individual trees to main site boundary locations. Also noted are the retention and enhancement of a large area of semi-improved grassland (again in the ecological zone) and various areas of wildflower meadow seeding, along with orchard tree planting opposite Plots 44 – 47. The development layout and its complementary planting scheme is generally in accordance with requirements of Local Plan Policy DSR3 with regard to landscaping required to provide appropriate landscape and visual impact mitigation measures, including planting to the southern and south-eastern boundaries, and also with regard to built development being set back from Ash Bank Road to retain open space here (which also would receive substantial new planting).

It is noted that the submitted landscape masterplan has not been updated to reflect more recent layout amendments. If this can be done prior to application determination, this would avoid the need for subsequent submission of an updated landscaping scheme under discharge of condition application; that said, given the otherwise acceptable landscape strategy and detailed specification already submitted, any minor revisions to suit the minor layout amendments could I am sure be acceptably dealt with under a “within 3 months of commencement” type condition rather than pre-commencement.

Requested Conditions in the event of planning permission being granted:

1. No trees, shrubs or hedgerows shall be removed other than those whose removal is directly required to accommodate the approved development, unless otherwise approved by the LPA. There shall be no removal of any trees, shrubs or hedgerows during the bird nesting season (nominally March to August inclusive), unless otherwise agreed by the LPA and in this case only following careful inspection by a competent person immediately prior to removal in order to establish that such trees, shrubs or hedgerow are not in active use by nesting wild birds.
2. Any mature tree to be removed or to have substantial crown pruning operations carried out shall first be carefully inspected for the potential to provide bat roosting opportunities. Any tree which has such potential (which could include cavities, splits, decay pockets, hollow stems or branches, areas of loose bark, dense ivy cover or dense epicormic shoots) shall be subject to a further detailed and if necessary climbing inspection by a licensed bat worker immediately prior to felling or pruning, and all felling or pruning of such trees assessed as having moderate or greater potential for roosting shall take place in the presence of the bat worker who can then immediately advise on appropriate measures if bats are encountered during dismantling, felling or pruning operations.
3. The first action on commencement of development, prior to any further action (including any site clearance, site stripping, site establishment or formation/improvement of temporary/permanent access) shall be the erection of temporary tree protection barriers and advisory notices for the protection of the existing trees to be retained, in accordance with guidance in British Standard 5837:2012 *Trees in Relation to Design, Demolition and Construction – Recommendations*, and as set out in the Aspect Arboriculture’s arboricultural impact assessment report reference 10893_AIA.001 Rev A dated October 2021 submitted in support of the application hereby approved, and these shall be

retained in position for the duration of the period that development takes place, unless otherwise agreed by the LPA. Within the fenced areas there shall be no excavation, changes in ground levels, installation of underground services, provision of hard surfacing, passage of vehicles, storage of materials, equipment or site huts, tipping of chemicals, waste or cement, or lighting of fires unless otherwise agreed by the LPA.

4. Before the commencement of development (including any site clearance, site stripping, site establishment or formation/improvement of temporary/permanent access) an arboricultural method statement for any areas where development, structures and engineering/groundworks operations (including installation of underground services) may encroach within the defined root protection areas of retained trees shall be submitted to and approved by the LPA. The arboricultural method statement shall include details setting out working methods and specification for any special protection measures for the avoidance of harm to existing trees on and adjacent to the application site. Such method statement and protection measures shall specifically include details and relative timescales, along with confirmation of arboricultural supervision of works, to ensure that appropriate measures are implemented to suitably protect retained trees from the initial outset of any construction activity. Thereafter, the development shall be constructed only in full accordance with details approved under this condition.
5. The planting scheme shown on Trevor Bridge Associates Landscape Masterplan Drg. No. 6615.01 rev D (*Note: update drawing number to suit any further revisions received prior to determination*) shall be fully implemented before the end of the first available dormant season (November to February inclusive) following completion of the development hereby approved. The trees, shrubs, and grass mixes planted and sown in accordance with this landscaping scheme shall be properly maintained for a period of 5 years following planting. Any plants which within this period are damaged, become diseased, die, are removed or otherwise fail to establish shall be replaced during the next suitable season.

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