

18 January 2019
L.19.01.17 Revised Proposals



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**Application Ref. 3/2018/0914 - Phase 2 Lawsonsteads,
Whalley**

By e-mail only

Dear Stephen,

This letter relates to the above application and specifically responds to the comments received from yourself dated 19th December 2018 which followed our meeting at the Council offices on the 6th December 2018. It is noted that we are still awaiting your elevational sketches and comments on the revised buffer sketch relating to plots 143-150.

As you're aware the statutory determination deadline (9th January) has now passed. In order to meet the target committee off the 7th February it will be necessary to make substantial positive progress in the next week. Your further commentary would therefore be greatly appreciated.

This submission is accompanied by the following:

- Proposed Site Plan (GF Plans) Rev. C;
- Proposed Unit Mix Plan (Roof Plan) Rev. P;
- Proposed Material Locations Rev. C;
- Proposed Surface Treatment Layouts Rev. C
- Proposed Boundary Treatments Rev. B;
- Proposed Boundary Layout Rev. A;
- Existing & Proposed Sections 01 Rev. A;
- Existing and Proposed Sections 02 Rev. A;
- Design and Access Statement Rev. C;
- Green Infrastructure Plan Rev. H;
- Below Ground Drainage Layout Overall Site Rev. P4;
- Below Ground Drainage Layout Sheet 1 Rev. P5;
- Below Ground Drainage Layout Sheet 2 Rev. P4;
- Proposed Site Levels Sheet 1 of 2 Rev P09;
- Proposed Site Levels Sheet 2 of 2 Rev P06; and,
- Extents of Adoption Section 38 and 278 PO4.

The text below should be viewed in conjunction with the drawings referenced above. For ease we have included your original comments (received 19th December).

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General Observations

1.2 To reiterate, given the linear country park falls within the red edge of your application I will require details to be provided in respect of the 'Playground to be provided by Redrow' and details of all proposed trim-trail/natural play located within its vicinity. As you will appreciate, should consent be granted, this will result in two parallel consents being in existence on site with either having the ability to be implemented, as such, details will have to be provided at this stage or an acceptance that these matters be conditioned.

We have provided details on this area on the revised Green Infrastructure Plan which closely match those that were approved as noted above.

Highways Issues

2.1 As you will note, at our meeting of the 6th of December we discussed terminating the northern Oakhill link road at the northern extents of the driveway for plot 30. I would be obliged if this could be reflected in any revised submission documentation.

Noted, this has been amended.

2.2 I note that you have amended the internal highway configuration in-line with LCC Highways comments. I will engage in re-consultation with the highways department regarding these amendments when revised information is submitted formally.

House-type Design

3.1 I have enclosed a number of sketch elevations for your consideration in respect of the proposed house-types and following on from our recent discussions.

We await these comments and will aim to provide a response and revised drawings as soon as possible on receipt.

Layout

4.1 I note that you have increased the offset/interface distances between the proposed dwellings in the southern parcel and the existing neighbouring properties on Woodlands Park and Sydney Avenue. I also note the submission of cross-sections that take account of changes in topography. I would request that such information forms part of any formal resubmission package.

Noted, drawings 'AA7403 2030 Existing and Proposed Sections 01' and 'AA7403 2031 A Existing and Proposed Sections 02' form part of the submission pack.

4.2 A number of plots still raise significant concerns in respect of substandard size/area of associated private amenity space. The following plots raise significant concerns and would be considered to be in direct conflict with Policy DMG1:

1. The constrained nature of the gardens associated with plots 3-5
The rear garage to plot 5 has been relocated and plots 2-5 moved slightly to allow for larger gardens

2. The constrained nature of the gardens associated with plots 12-14
Plots moved closer to road to increase garden length
3. The constrained nature of the gardens associated with plots 104-108
Rear boundaries have been reviewed to provide larger gardens
4. The constrained nature of the gardens associated with plot 56 and the properties oblique interface distance with plots to the east give rise for concern.
This garden is 11.6m long. We do not believe the interface distances to be a concern here, the closest window to window (oblique) distance is 18m and plots 51-52 are over 21m measured directly from the rear of 56-57. Policy DMG1 does not set out any specific interface distances or standards that should be achieved and the Council have not adopted any supplementary guidance. It is therefore considered that interface distances are policy compliant.
5. Plots 60-63: Overlooking distance at first floor into adjacent residential curtilage is still below the 10.5m standard
The gardens to the ground floor apartments have been increased to 10.5m
6. Plots 175-176 and 185-186: The garden areas associated with these properties will be significantly overlooked from properties to the east and west to an extent, cumulatively, that the garden areas are unlikely to benefit from any sense of privacy.
We do not believe this to be significantly different to the scenario of other plots within the scheme which occur on most corners.
7. Plots 139-142: Consider moving these properties and assorted parking court northward to increase the offset margin between the neighbouring boundary to the south.
We cannot unfortunately move these plots due to the surface water pumping station which is located beneath the parking area.
8. The interface distance, albeit oblique, between plots 2 and 6 is significantly short of the 21m standard.
Measured directly from the rear of plot 2 this is significantly more than 21m and the closest window to window (oblique) measurement is 19m. Again, it is therefore considered that interface distances are acceptable.

There are no nationally set standards in respect of interface distances between properties, and in this instance there are no locally set standards. To therefore state that internal interface distances do not meet the standards of DMG1 is misleading, and there is no policy basis to support this assertion. Indeed no evidence has been put forward to suggest that any adverse impact on residential amenity would actually occur.

Notwithstanding the above, the development as proposed does achieve those standards often applied by local planning authorities. Indeed, most Local Planning Authorities usually allow for a certain degree of flexibility, particularly when considering interface distance between proposed plots located within the scheme. Indeed, it is noted that the previously approved outline consent obtained planning permission for a greater quantum of development, and it is questionable as to whether that scheme could be delivered if such stringent standards, which are not set out in policy are applied. The overall density of development is considered appropriate for the location and the interface distances that are achieved reflect this, and are constrained by the significant amount of open space being delivered.

4.3 I remain disappointed that you have failed to provide a green margin or buffer between the dwellings proposed in the southern development parcel and existing housing. You will note my previous observations in relation to this matter (Point 4.3 2018/ENQ/0002/UD/01). In relation to this matter and as discussed, the LPA does not consider that a landscaping margin within private residential curtilage could be affordable any reasonable long-term prospect of protection, either through enforcement powers that could be exercised by the authority or through clauses within the title deeds of the relevant properties. I would also consider it onerous and unreasonable to dictate what planting/vegetation be retained within private curtilage.

A margin has now been provided as per 'AA7403 SK12 A Proposed Landscape Buffer' this is illustrated on the revised layouts so this drawing does not necessarily need to be included in the planning pack.

4.4 At our recent meeting we discussed the need for bespoke consideration to be given to the eastern boundary of the southern parcel given its visual relationship with the open countryside to the east. As you will recall, green-screen treatments or low level treatments were discussed. I would be obliged if you could provide clarification as to whether such matters have been further explored.

On the boundary drawing we have illustrated this boundary as a new native hedgerow (reinforced by a 1.2m high post and wire fence or post and three rail timber fence on the boundary line) which we have discussed with our landscape architect and believe is an appropriate treatment for this rural setting.

Green Infrastructure, Landscape & Ecology

5.1 Following on from our recent meeting I would encourage you to explore introducing a higher proportion of tree planting along the easterly 'trim-trail' route. As discussed I would suggest that linear arrangements are avoided and would encourage pockets of dense tree-island planting. This will allow for a varied user experience for those utilising the route.

Please see updated Green Infrastructure layout (L1100)

5.2 I would also suggest that such planting arrangements are utilised to lessen the linear visual appearance of the outer access road serving plots 68-84. I note from your comments that you intend to 'retain views out from properties'. However, I would consider that the lessening of the linear visual effect of the road alignment and building arrangement upon the landscape to be of a higher priority.

As above.

5.3 As per our meeting of the 6th of December I would be obliged if you could provide details of the interface between the proposed pedestrian routes and that of the existing PROW. Given it is likely the PROW will experience increased footfall as a result of these connections I would also be obliged if you could provide details of any surfacing improvements proposed on the PROW. You will note that DMB5 requires compensatory enhancements that will result in a net improvement in the Public Right of way network.

As above.

5.4 No details of the proposed trim-trail equipment have been provided at this stage despite requesting this to be submitted as part of the application. For the purposes of public consultation I consider such details should form part of the submission.

As above.

Summary

We trust that the amendments set out above address your concerns and it is considered that the proposals are in accordance with the parameters of the outline consent and also relevant national and local planning policy.

However, it is worth reiterating that the scheme will deliver numerous positive benefits which weigh in favour of the application and are material to its timely determination. As you're aware the scheme benefits from planning permission and therefore forms part of the Council's identified housing land supply, indeed the site is identified as a committed housing site in the emerging HED DPD. The proposals will also deliver a range of house types, capable of accommodating families, young people and the elderly. The scheme can also be delivered quickly by a willing developer, leading to the provision of significant number of both market and affordable dwellings. With the above in mind, and the lack of objection from statutory consultees, it is considered that the scheme should be recommended for approval.

I trust you find the above information useful, and we look forward to discussing our response with you further. However, in the meantime, should you have any queries please do not hesitate to contact Rob Haslam or Alun Davies at these offices.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Savills", written in a cursive, stylized script.

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