

Pemberton Hill Supplementary Comments 14th April 2016 MIE

1. The applicant has pointed out, quite reasonably once or twice, during conversations that this is an outline application. As you'll be aware, it is now established in case law that projects must be defined in sufficient detail, even at outline stage, to allow its effects on the environment to be identified and assessed.
2. Should the policy objection to development be withdrawn and other issues be addressed to your satisfaction it may well be necessary for me to seek some design parameters as part of any conditions. We are still waiting the design code document promised at the last meeting. I anticipate that this will inform any such design parameters.
3. As far as I can establish the developer significantly underestimates the visual quality of the landscape in relation to the varied and interesting nature of the topography. This aspect of the landscape is considered to be medium to high value. Whilst it is accepted that the development will not fundamentally affect the levels, the perception of the topography will be fundamentally altered for the worse because the surface will be altered by the imposition of the houses.
4. In relation to the assessment of visual impact there doesn't seem to have been any assessment of the different type of people using the landscape surrounding the proposed development. The types of viewers who will be affected and the places where they'll be affected should be identified.
5. The viewpoints from Little Dower House should also be addressed.
6. The LVIA could also consider cumulative effects (both landscape and visual) in relation additional developments in the area. This could include sites bordering the application site for which there is likely to be development pressure resulting from this development and the adjacent area identified in the recent EBC Issues and Options paper. These can be found in the SLAA. All sites within the same landscape character area as the application site could be included. This should address the combined effects of all other future and likely proposals together with the application site. The combined effects are highly likely to be significant, even where they have not been found to be significant for the application site on its own.
7. The verdict in the EIA regarding degree of significance of a number of the changes to the benchmark viewpoints resulting from the development is disputed.
8. Specific comments on latest series of submitted documents and emails (March 2016)
 - The new options continue to ignore our advice that the main quantum of POS should be provided in one area and that this must be exclusive of the SUDS area and must be on level land (see further detail below).
 - There should be a reduction on our usual density requirement to allow for belts of screen planting around the margins of the site and for the large SUDS areas, which aren't required in existing urban contexts. Can the developer please confirm that their figures for 'Housing area only' exclude these areas, in which case this requirement can be easily met.
 - The assurance of the developer's ability to create linking footpaths from the development to the surrounding PROWs is very welcome. However, can we please have these displayed on a plan.
9. The area of POS provided as the main source of recreation and play space is still completely inadequate. As a benchmark, the Knowle Lane scheme provides such an integral area of open space as the council is requesting, which equates to an area of 42m² per unit. This

application offers an integral open space area equating only to 16m² per unit (based on a total of 192 units and an area of 0.3 Ha. It should also be noted that the council disputes the area allocation of 0.3 ha on, for example option 1. Measuring off the plan the area would appear to be 0.27ha, some 10% less than the area claimed. A larger scale plan at 1:1000 should be provided to better facilitate checking by both sides.

10. 'Formal' open space. There needs to be an area of public open space in a fairly central location in the site which should include the LEAP and room for a kick-about area. This should be a minimum of 0.46Ha.
 1. One third of the area should be no steeper than 1:50.
 2. Another third should be no steeper than 1:40.
 3. No restriction on slope angle for the third part.The LEAP and kick-about area should be contained within the flatter areas, except where slope change is an integral part of the play area design.