

## Introduction

This statement has been prepared as a supplement to our Landscape Design Statement L0892DS01C. It sets out our responses to landscape related comments associated with the Refusal of Permission to Develop, Application No: DC/22/129789. These comments are located within with in the associated Design Review Panel Report (dated 10<sup>th</sup> March 2023), Conservation Comments (21-57 Willow Way (Site A)), Urban Design Comments (21-57 Willow Way (Site A)), Planning Officer Report, Ecology Comments & Objection (Dated 13 February 2023 20:09).

## Design Review Panel Report

### Page 6 Para. 4:

“The headline Urban Greening Factor is shown to be good but it was not clear to the Panel how this would be achieved.”

### Response:

The Urban Greening Factor calculation is set out on Page 18 of the Landscape Design Statement (L0892DS01C) submitted as part of the planning application in December 2022. It clearly locates the various surface cover types and their areas, which form the basis of this calculation. An assumption was made that the green roof would be a Biosolar green roof, with the green roof element extending beneath any proposed PV panel mounted within the roof area. Bauder Flora 3 Seed mix or similar would be specified to achieve this aim.

Therefore, an Urban Green Factor score of 0.520 would be achieved.

### Page 6 Para. 6:

“The Panel challenged the roof garden design. The raised planters will in effect reduce the balustrade/parapet height leading to one of two options:

- An increase in the height of the parapets/balustrades to the roof garden which will affect the elevational and sectional design.
- The area of planting is reduced to allow the parapet/balustrade heights to remain as designed.”

### Response:

A section through the roof garden landscape is shown on Page 11 of the submitted Landscape Design Statement (L0892DS01C). This drawing shows the parapet edge with railings. This element is defined in the key as “Parapet edge with barrier to be 1100mm above soil level.” Therefore, there will not be an increase in height to the balustrade/ parapet and the area of planning will not need to be reduced. The topsoil will be maintained as per our section and the planting shown within the

submitted Landscape Design Statement will thrive. The Design Review Panel's (DRP) interpretation of the drawing was therefore incorrect, potentially resulting from the DRP reviewing the DAS, but not the submitted Landscape Design Statement.

**Page 6 Para. 8:**

“Passive design measures should be employed to shelter the roof gardens from wind to ensure that they are usable by the residents.”

**Response:**

The barrier to the parapet edge has yet been defined. This element could be designed so as to help to attenuate the wind within the roof garden landscape. This could be in the form of perforated steel panels or a series of fine weldmesh panels. These design details could be secured by an appropriately worded condition.

## Conservation Comments

**Page 2 Para. 4, Point 2:**

“No street trees are proposed along the frontage of this site...”

**Response:**

Trees have been included at ground level where practicably possible. These are shown on Page 15 of the submitted Landscape Design Statement (L0892DS01C) and are located within the rear courtyard space. In addition, one is located within a triangle of land to the south of the proposed building. The species selected are suitable for these locations.

There is a narrow strip of land to the frontage of this site, between the proposed building's west elevation and the plot boundary. It is not prudent to suggest trees could be planted within this strip of land. There is insufficient space above ground for their canopies to spread and grow. Planting trees in this location would likely cause maintenance issues with the building façade. In addition, the tree trunks and canopies would likely grow to lean away from the proposed building elevation. The trees may then become unstable and cause health and safety risks in the future, as they become larger. In addition, a services and utilities survey was carried out along Willow Way. Extensive services were identified underneath the footpaths that limit the potential for street tree planting.

## Urban Design Comments

### Page 2 Para. 3, Point 6:

“No buffer zone/softening has been provided between the pavement and the hard edge of the building.”

### Response:

There is a narrow strip of land to the frontage of this site, between the proposed building’s west elevation and the plot boundary. The submitted Landscape Design Statement (L0892DS01C) suggests this strip of land should be paved to the building edge. This will have the effect of widening an existing, relatively narrow, public footway.

The ground floor of this proposed building is made up of three flexible commercial units, communal residential entrances and various service entrances. In order to fulfil the planning policy objective of delivering an employment-led development, a decision was made to pave this strip of land between the proposed building’s west elevation and the plot boundary so as to maximise the existing and future flexibility of use of these three commercial units.

### Page 3 Para. 3, Point 3:

“The proposal includes a courtyard garden to the rear of the site, adjoining the William Wood care home. No clear use for this site has been established, except as a ‘wildlife friendly, visually attractive space’ with some parking and cycle storage. Given no yard space is provided to the industrial units which open out onto this space via roller shutters, there is a risk that this garden could become a dumping ground for industrial scrap.”

### Response:

The courtyard space to the rear of the building has been designed so as to be visually attractive and to provide visual amenity and opportunities for biodiversity. The intention is to provide attractive views for the residents of William Wood care home who would overlook this space, for the occupiers of the commercial spaces at ground floor and for the residents of the proposed building which would overlook this space.

This space is gated, with access provided to the residents of this proposed building and the three ground floor commercial units. When considering the dumping of rubbish within this space, it would be easier for residents of this building to place their rubbish in the bins provide than to travel the extra distance and dump their rubbish in the rear visual amenity space.

The commercial units are provided with their own dedicated, separate refuse stores and therefore would not need to store commercial waste to the rear. We would

suggest that the leases for these commercial units would stipulate that these units are not allowed to store anything within this space. This space would need to be managed and maintained and any breach of the lease conditions could be identified at these times. This management company would be appointed by the appellant prior to occupation of the commercial units.

**Page 4 Para. 2, Point 4:**

“No provision for public furniture, pause spaces or street trees has been made on Parcel A”

**Response:**

There is a narrow strip of land to the frontage of this site, between the proposed building’s west elevation and the plot boundary. The submitted Landscape Design Statement (L0892DS01C) suggests this strip of land should be paved to the building edge.

The ground floor of this proposed building is made up of three flexible commercial units, communal residential entrances and various service accesses. In order to maintain the primacy of the commercial units, maximise the flexibility of use of these three commercial units and to maintain clear access points to the building entrances, a decision was made to keep this edge as uncluttered as possible i.e. just a paved surface. The decision for not including trees within this zone has been discussed in the response to the Conservation Comments above.

## **Planning Officer Report**

**Page 61, Point 406:**

“There is also a discrepancy between the proposed drawings and landscape design drawings at ground level. The former proposes 5 parking spaces and 5 new trees, while the latter (3.1.1) only 2 parking places and 6 trees.”

**Response:**

As identified on DC Architecture+Design’s drawing (KTW034-DCR-GF-PL-A-0100), there are to be 2 active wheelchair accessible parking spaces from the outset. These are identified on our drawing landscape plans throughout the submitted Landscape Design Statement (L0892DS01C). In addition, DC Architecture+Design has identified 3 passive wheelchair accessible parking spaces within the rear courtyard space on their drawing (KTW034-DCR-GF-PL-A-0100). These can be faintly seen on landscape plans throughout the submitted Landscape Design Statement (L0892DS01C). These spaces will not initially be installed, we have therefore shown them as part of the wild flower meadow within this space. One additional passive wheelchair space is shown on Willow Way on DC Architecture+Design’s drawing (KTW034-DCR-GF-PL-A-0100).

The proposed trees shown on Page 15 of the submitted Landscape Design Statement (L0892DS01C) are correctly located.

**Page 61, Point 407:**

“Living roofs, wildlife friendly planting and podium level landscaping are welcomed in principle. However, none of these will be publicly accessible. GR2, point I of the emerging Local Plan (Reg 19 version) requires that “Development proposals, should maximise opportunities to introduce new publicly accessible open space, giving priority to green space, as well as improve connections to existing or planned new open spaces, particularly in areas of open space deficiency. Major developments must incorporate new publicly accessible open space unless it can be clearly demonstrated that this is not feasible, in which case off-site contributions may be required.” The site is located in an area of deficiency to open space (>2 and >20 ha) and it is a major development therefore publicly accessible open space must be incorporated in the development.”

**Response:**

Given the constrained nature of Plot A it has not been feasible to provide publicly accessible open space at ground level. Roof top gardens have been provided as part of the landscape proposals for this development. However, due to management issues it is not possible to give public access to the roof top open space, access would be restricted to the residents of this proposed development.

**Page 61, Point 408:**

“Overall there is clearly potential to increase biodiversity measures on site. However, at present, given the previously mentioned issues with the roof level amenity spaces as presented, officers cannot conclude the living roofs, wildlife planting and roof level landscaping as presented will be proposed. The ecological regeneration officer raises concerns about public open space and the lack of public realm within this scheme and lack of detail on delivery of a site wide public realm/ open space strategy has been raised in various policy sections/ consultation comments throughout the report.”

**Response:**

The first part of this statement has been addressed within the second Design Review Panel Report response. It is considered that parapet edge detail has not been understood correctly. There will be a sufficient depth of topsoil to support the planting described on Page 16 of the submitted Landscape Design Statement (L0892DS01C).

The second part of this statement has been addressed within the preceding response. Looking at Plot A in isolation, it is not possible to provide meaningful on site public realm.

## **Ecology Comments**

### **Point 6:**

“In general, the proposed plans do not seem to maximise opportunities to improve the site by soft landscaping at ground level as the majority of the site is proposed to be built on or covered with hardstanding (e.g. parking spaces). There is also a discrepancy between the proposed drawings and the landscape design drawings at ground level. The former propose 5 parking space and 5 new trees, while the latter (3.1.1) only 2 parking spaces and 6 trees.”

### **Response:**

In response to the first part of this statement, we have tried to maximise the planting at ground level whilst accommodating the existing and future need of this proposed building.

The second part of this statement has been addressed within the first Planning Officer Report response

### **Point 8.:**

“The UGF mentioned living roofs but there are no further details provided. It is unclear if the UGF calculation considered a biosolar system or the size of the proposed living roof will be reduced due to PV panel installation on the roof in which case the UGF needs to be recalculated.”

### **Response:**

This statement has been addressed within the first Design Review Panel Report response.

## **Objection (dated 13 February 2023 20:09)**

### **Page 3 Para. 7, The green roof and roof terraces:**

“There appears to be a degree of confusion about how these spaces will appear and be used. The Design and Access statement has a sketch on p44 showing solar panels on the roof, but none are shown on the plans in the landscape Design Statement. Likewise, the Design and Access statement shows the roof terraces as being covered in green plantings whereas the submitted landscape Design Statement (p.14) shows them as being fitted out with children's play equipment. There also seems to be some confusion in the proposals as to who will have access

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to which roof terrace. There is also a discrepancy between the different documents about how close to the edge of the roof terraces the users will be able to get. The Landscape Design Statement suggests that the edges will be planted, whereas the Proposed Drawings Document clearly shows people standing on the edge of the Terraces looking out at the world beyond. All this raises privacy issues for the neighbouring properties, especially in light of the recent Supreme Court Judgement regarding Tate Modern - roof terraces are neither a common or ordinary use of roof space in housing developments.”

**Response:**

In response to the first part of this statement. The Urban Greening Factor calculation diagram, shown on Page 18 of the Landscape Design Statement (L0892DS01C), identifies the extent of the Biosolar roof only. It does not show the locations of any PV panels. The extent of the Biosolar roof is correct.

In response to the second part of this statement. The roof spaces will be set out as shown on Page 8 of the Landscape Design Statement (L0892DS01C). All three spaces are to include planting, seating and play equipment.

In response to the third part of this statement. The access strategy to the Level 4 roof gardens is set out on Page 14 of the Landscape Design Statement (L0892DS01C).

In response to the fourth part of this statement. The submitted Landscape Design Statement (L0892DS01C) identifies there will be no access to the parapet edges from the Level 4 roof gardens. Page 11 of the Landscape Design Statement shows a typical section through the south roof garden to demonstrate this.