

COMMENTS IN RESPECT OF CONSULTATION RESPONSES

Crime Prevention Officer

(i) Site layout

All the vehicle parking bays are within curtilage and/or overlooked.

Agreed – no amendment necessary.

However concerns are raised in respect of the link to Riverside Walk as this connection undermines the defensible space of the development and should be designed out. Such links on other developments have caused issues.

Whilst it would be a relatively straightforward amendment to remove the riverside walk link, I consider this would be detrimental to public amenity, access and enjoyment of the riverside walk. I do not think a possible risk of 'anti-social behaviour' should restrict the level and extent of public open space or indeed access to the riverside walk.

Pedestrian routes must be designed to ensure that they are visually open, direct, overlooked and lit. This link is not. Routes should also not be segregated from one another or provide access to rear gardens as such paths have been proven to generate crime. Paths ideally should be 3 metres wide.

All the routes are visually open and partly overlooked. It is worth pointing out that the riverside walk itself is not overlooked. Solar lighting for the path will be introduced in consultation with the Highways Officer and the width of each 'cycle access link' has been widened to 3000mm.

In addition there are concerns in respect of the public open space areas between plots 9 and 10 and at the rear of plots 22-25. The area between plots 9 and 10 as this area is directly adjacent to the properties and will result in all probability cause annoyance for the residents of the homes adjacent to this area. In addition this space provides access to the rear gardens of these properties.

Again, a balance has to be secured between the provision of public amenity space and anti-social behaviour. These two areas of open space are not 'kickabout' areas but are landscaped areas for informal relaxation and visual enjoyment.

In respect of the space to the rear of plots 22-25 this gives easy access for criminals to the rear gardens of these plots.

Criminal access is a universal problem and only certain preventative measures can be introduced. The open space at the rear of these plots is essential to promote access to the archaeological feature.

Both open space areas should be designed out. If they are to remain they must be planted with thorny plants or bushes to stop would be criminals gaining access to these areas.

Agreed – anti-personnel shrub planting will be introduced. Details added to drawing no. LANDSCAPE2A(REV) and a selection of the following shrubs have been incorporated -

Crataegus in var. esp Prunifolia & Oxycantha
Berberis in var. esp Darwinii & Gagnepainii
Elaeagnus Augustifolia
Ilex Aquifolium
Mahonia Aquifolium
Prunus Spinosa
Rosa Rugosa
Ulex Europaeus
Rubus Fruticosus

Entry onto the estate must be restricted to the designated routes.

Agreed - there is only one vehicular access into the site.

(ii) Lighting

Lighting on the estate must meet the British Standard 5489:2013.

Agreed - added to 'security measures section' in revised Construction Method Statement (CMS).

(iii) Boundary identification

Defensible space using symbolic barriers e.g. pillars, rumble strip, or a change of road surface, i.e. colour or texture, must be built into the design to encourage a feeling of territoriality amongst users especially at the entrance to the development.

Changes of road surface can only be agreed with the Highway Authority. For adoption purposes the road surfacing has to be of a certain type and standard.

There must be a change of surface, i.e. colour or texture, to identify public areas from private or semi-private areas e.g. the footpaths from the driveways/front gardens.

Agreed – this is already the case.

Preferably front boundaries would be identified by low walls and gates.

Not possible as front boundaries are often utilised for car parking spaces.

(iv) Landscaping and planting

Overgrown shrubs and other thick barriers that are in close proximity to public areas must be avoided and clear sightlines must be maintained over long distances. Windows and doors

must not be obscured by landscaping features and trees in public areas must not have any foliage below 2 metres from the ground.

Agreed – adequate sight lines already exist.

Trees and other landscaping features must not be positioned where they could create hiding/entrapment spaces, obscure signage and lighting or provide a potential climbing aid into properties.

Agreed – this has already been taken into account in the submitted design.

There must be clear lines of sight across the development and clear unobstructed views of the parking bays from the properties.

Agreed – this is already the case with all parking bays and their respective dwellings.

(v) Public open spaces

These areas should be located where they are afforded good natural surveillance from residents to provide protection for the young children using the areas. Also this would reduce the risk for the areas being targeted for anti-social behaviour when not in use.

Agreed – all areas of open space are subject of natural surveillance from nearby dwellings..

Ideally the areas would be protected by railings/fencing to prevent vehicular entry and they should be locked out of hours.

It would be difficult to try and prevent entry into these open space areas. If residents are excluded from these areas it will remove residents' rights to enjoy the area at all times (dog walking, jogging, etc.).

Any planting must be of the low level type, i.e. plants or bushes must only grow to a maximum height of 1 metre and trees should have no branches below 2 metres from the ground to afford maximum surveillance of the spaces.

Agreed – this is a matter for the longer term maintenance of the site's 'plant' resource.

They should not be located where they provide access to the rear of properties or be located between and directly adjacent to properties where they could cause issues for residents in properties adjacent.

Agreed – this has already been taken into account.

(vi) Vehicle parking

Vehicle parking should be within curtilage and must be overlooked preferably by rooms in the properties ideally, that are usually occupied e.g. living rooms, kitchens.

Agreed – this is already the case.

During the hours of darkness, the bays must be well illuminated, and they must enjoy good natural surveillance from the properties with unobstructed views.

A street lighting plan will secure adequate illumination and will be drawn up in consultation with the Highway Authority.

(vii) Garage security

All garage doors should meet the standard PAS 24 2016 or equivalent. There should be no windows fitted in garages and garages should have an alarm fitted that meets the relevant British Standard.

Agreed.

(viii) Side and rear boundaries

The walls/fencing/railings and gates preventing access to the rear and sides of the properties should be robust, at least 1.8 metres high (2 metres high if the side or rear gardens are adjacent to open land or a footpath). To prevent it being climbed the perimeter security must be of a suitable design.

Agreed – 1.8 m high fences are incorporated in the scheme.

Gates must be lockable both sides with a key, the same height as the adjacent wall/fencing and sited at, or as near to, the front building line of the properties as possible.

Agreed.

Rear and side gardens must be secure areas.

Agreed – all rear and side gardens are enclosed by timber fencing.

(ix) Garden sheds

Garden sheds should be sited away from the rear fencing or walls to prevent assisting people in climbing over them.

Not a matter that can be realistically controlled. The developer will however release advisory information to prospective property purchasers.

(x) Bin stores

Bins must be kept in secure areas.

Agreed – all bins stored within enclosed rear gardens.

(xi) Bicycle stores

Bike stores must be secure, lit and overlooked by the properties (please visit www.securedbydesign.com for more information).

Agreed.

(xii) Security lighting

Security lighting should be installed controlled preferably by photo electric cells or time switches or alternatively PIR detectors. The lighting should protect the rears and sides of the homes, the parking bays and the driveways.

Agreed – appropriate security lighting will be incorporated into design. Added to 'security measures section' in revised Construction Method Statement (CMS).

Callers at the external doors of the properties must be lit during the hours of darkness by appropriate lighting.

Agreed – appropriate security lighting will be incorporated into design. Added to 'security measures section' in revised Construction Method Statement (CMS).

(xiii) Drainpipes

If the drainpipes of the properties are not within the fabric of the buildings they must be designed so that they do not offer an assist to climbing.

Noted - to be considered at construction stage.

(xiv) Blank walls

Windowless elevations or blank walls adjacent to space to which the public have access, should be avoided and provide at least one window to a habitable room wherever possible. Where blank flanking walls are unavoidable, a 1 metre 'buffer zone' must be created.

Agreed – where feasible, but where not, security cameras to be introduced. Added to 'security measures section' in revised Construction Method Statement (CMS).

(xv) Public utilities

If smart meters are not installed, meter boxes must be fixed to, or as near to, the front building lines of the properties as possible.

Agreed – meter boxes to be fitted at front of dwellings. Added to ‘security measures section’ in revised Construction Method Statement (CMS).

(xvi) Access control

Access into apartment blocks should be controlled if there are 4 or more apartments using one communal entrance. Entry should be controlled by access control with audio and visual verification fitted.

Apartment blocks are not proposed for this site.

(xvii) Door security

All external doors in the properties must meet the standard PAS 24 2016 or equivalent and should be third party tested and certificated. The entrance doors into the apartment blocks must also meet the same standards.

Agreed – however apartment blocks are not proposed for this site.

The individual apartment external doors must also meet the standard PAS 24 2016 or equivalent and also should be third party tested and certificated.

Agreed – however apartment blocks are not proposed for this site.

Doors that are described as fire doors, or where fire performance is declared or implied, are required to have third-party certification for both security and fire performance. Fire doors must have no external furniture fitted.

Agreed – this is a matter for Building Regulations.

Glass in door panels or adjacent to door panels must be laminated.

Agreed – this is a matter for Building Regulations.

Doors in recesses of more than 600mm must be avoided.

No recessed doors are proposed for this site.

(xviii) Window security

All vulnerable windows fitted, e.g. ground floor windows, windows above flat roofs, must meet the PAS 24 2016 or equivalent and should be third party tested and certificated. They should also have key operated window locks fitted.

Agreed - added to ‘security measures section’ in revised Construction Method Statement (CMS).

(xix) Intruder alarm system

A 13 amp fused spur should be installed in each individual property. Ideally all properties would have an intruder alarm fitted up to the relevant British Standard.

The necessary electrical wiring layout will be designed to allow the fitting of intruder alarms by each future household. Added to 'security measures section' in revised Construction Method Statement (CMS).

(xx) Identification of properties

Property numbers and street names must be clearly displayed.

Property numbers and street names will be determined in conjunction with the Local Authority/Post Office/Community Council.

Tree Officer

The proposed landscaping for this site is shown on the JCR Planning drawing number: LANDSCAPE1A.

With a mixture of native and garden cultivar species the tree and shrub species are acceptable and will provide biodiversity and aesthetic benefits. Pre planting and post planting maintenance has also been specified. My only concern is that due to its growth rate and eventual size. It is recommended that the replacement of T3 Acer platanoides with a smaller species. T3 could be exchanged with the Malus T8 which would avoid future problems such as excessive leaf litter, shade and root growth.

Agreed – tree species amended on drawing no. LANDSCAPE2A(REV).

All trees and shrubs should be supplied, handled and planted in accordance with BS8545:2014 Trees : from nursery to independence in the landscape.

Agreed – added to annotation on drawing no. LANDSCAPE2A(REV).

NRW

Raises concerns with the application as submitted because inadequate information has been provided in support of the proposal. To overcome these further information is required regarding Pollution Prevention. If this information is not provided, they would object to this planning application. Further details are provided below.

CMS has been amended.

We have reviewed the Construction Environment Management Plan (CEMP) prepared by JCR Planning, May 2021, and there is insufficient detail to demonstrate the pollution prevention provisions for controlled waters.

CMS has been amended.

Reference is made in the document to piling techniques – further information is required regarding the method of piling so that we may consider the risk posed to controlled waters.

The CMS has been amended and additional information is attached (provided by ‘Roger Bullivant Limited’).

“Works within close proximity to the River Amman will be carefully monitored in order to reduce the risk of sediment pollution.” Further detail is required to demonstrate this statement and what pollution prevention controls will be deployed in order to safeguard the River Amman?

CMS has been amended.

Section 10.0.7 states “Adequate provision for dealing with silty water is to be agreed in advance” We would expect this detail is to be set out in the CEMP. “Any planned discharges off site will require prior approval with the appropriate authority.” It is not clear what is meant by this. Will this be rainfall related site drainage during the development?

CMS has been amended.

There is no detail of where the wheel-wash and plant jetting washing facilities be located. This should include details of the dirty water discharge produced by these activities.

The site of the wheel wash is identified in the submitted CMS plan. Further details have been added to the text.

Ecology

NRW recommend the ecology section of the CEMP is updated to include the following information. Due to the extremely close proximity to the river Amman, which is a breeding and commuting river for otters, the developers would need to adhere to appropriate mitigation measures to avoid any disturbance. All work in, or adjacent to, watercourses should be restricted to daylight hours, particularly avoiding the dusk and dawn periods when otters are

most active. Before starting work, any major tree root systems or areas of dense vegetation should be inspected for signs of otter use. If otter signs are found, further advice must be sought from the NRW Biodiversity Officer and a licence may be required. Otters and their resting sites are fully protected under the Wildlife and Countryside Act 1981 (as amended by the CROW Act 2000) and the Habitats Regulations 2010.

Agreed – requirement added to CMS.

Construction materials must be stored well away from the watercourse in way that prevents otters gaining access or using them to rest in (Eg. pipe ends will be capped or covered) Any trenches that are left open overnight will have planks of wood placed at regular intervals to allow otters a way out. All tools, food, litter and construction materials and packaging that may constitute a hazard to otters will be removed daily from the site. Any areas that may be suitable for use by otters will be checked immediately prior to works commencing by a suitably qualified, experienced and licensed ecologist.

Agreed – requirement added to CMS.

Any tree/shrub felling and scrub removal should take place outside the breeding bird period (March to August inclusive). Vegetation removal within this period will require a survey for nesting birds. Breeding birds are protected under the Wildlife and Countryside Act 1981 (amended).

Agreed – added to CMS.

Dwr Cymru/Welsh Water

Raised no objection to this latest application (Ref: P2021/0591) for approval of the reserved matters subject to compliance with the requirements of any drainage related conditions imposed on the outline planning permission, or any subsequent applications to vary the conditions thereon.

In this respect, we acknowledge receipt of a 'Surface Water Drainage Strategy' and 'Surface Water Drainage Details' (Drawing No. 2104/301) which appears to indicate proposals to dispose surface water flows into the adjacent watercourse. In principle we have no objection to the surface water drainage proposals albeit would advise that the development is now subject to Schedule 3 of the Flood and Water Management Act 2010, therefore requiring SAB consent, and we would advise that the proposed development site is crossed by a 12" combined public sewer. Please note no operational development or SuDS features, proposed

as part of any forthcoming SAB application, shall be permitted within the protection zone of the sewer measured 3 metres either side of the centreline.

Agreed and noted - the required SAB application will be submitted and approved prior to the commencement of works.

Biodiversity

No comments.

Noted.

Highways Officer

Raised the following concerns:

- 1. Active travel needs to be considered, there is an existing cycleway which the site is proposing to link with however no provision has been made for a cycleway through the development itself.*

Given that the estate road will only accommodate limited residential traffic, it is perfectly reasonable for the cycleway to go through the site along the estate road. There is no through traffic to add to safety concerns. In addition, the route of the existing Amman Valley path, alongside the River Amman, is an alternative route for cyclist and pedestrians.

- 2. In respect of a provision of a cycleway link from the development to the existing footbridge, the plan provided does not annotate the existing footbridge. In the interest of clarity the footbridge must be annotated on the plan to ensure the proposed link is located in the correct place, furthermore the width of the link shall be 3m wide and surfaced in a bitumen bound material with adequate drainage.*

The scheme has been amended to show the existing footbridge and the width of the link has been increased to 3 metres width and bounded in tarmac with adequate drainage.

- 3. The highway layout does not comply with NPCBC 'Design for the Layout of Roads whereby the highway should be designed to a 20mph limit.*

A number of traffic calming measures have been introduced and included within the revised site plan. Full details will be agreed as part of S38/278 procedures.

a. *There are unrestraint straight lengths of highway which lend itself to increased vehicle speeds.*

Traffic calming measures have been incorporated within the scheme and will form part of the highway adoption procedures.

b. *The traverse length of the turning head is overly long and will result in an unacceptable reversing distance for vehicles including refuse and recycling vehicles.*

The traverse length has been reduced.

c. *Forward visibility sight lines of 33m around plots 17 and 35 need to be annotated on the plan within which nothing over 600mm in height shall be erected or allowed to grow, these areas are normally adopted by the Local Authority*

The parking arrangements for these two properties have been altered.

d. *Gradients of the highway and driveways have not been provided*

The site is relatively level and, for the majority, gradients of less than 1% for both highways and driveways will apply.

e. *The proposed carriageway construction is not in accordance with NPTCBC 'Specification for the Construction of Roads for Adoption'*

The specification has been altered.

4. *Driveway dimensions are incorrect and should be as follows:*

Single driveway 6m in length by 3.6m wide

Double driveway (tandem) 10.8m in length by 3.6m wide

Triple driveway (tandem) 15m in length by 3.6m wide

Double driveway (side by side) 6m in length by 6.2m wide

Triple driveway (side by side) 6m in length by 8.8m wide

Driveway dimensions have been altered to correspond with the above.

5. *Access to driveways are not permitted from the kerb radii's – plot 17 and 25*

The driveways of these plots have been altered to avoid crossing kerb radii.

6. *The details provided for the discharge of Condition 20 – Construction Method Statement are acceptable*

Noted.

Drainage Officer

Advises that SAB approval will be required.

Agreed - the required SAB application will be submitted and approved prior to the commencement of works.

Environmental Health Officer

“ We do not accept the proposed hours of construction and these should be amended to 8am – 6pm Mon –Fri and 8am – 1pm Sat, we also do not accept that they need half an hour each side and activity on site is only permitted within these times. They should remove the reference to evening working as this is not acceptable unless in essential circumstances.”

Agreed – CMS has been amended.