

**Text of email received from Logic Architecture 4<sup>th</sup> October 2017.**

Good evening Allan,

Further to my previous email clarifying our clients position in respect of sites may I take the opportunity to pass comment on the initial site scoring for sites S/073/009 & S/073/010 which I believe have not been technically and fairly scored for the reasons summarised below:

**2. Site is separated from the existing built area by Belbrough Lane and Station Lane.**

As described both sites S/073/010 adjoin residential housing and the provision of a road is not grounds for arguing that the site is separated from a residential area (by definition a 'Red' score is surely intended to score isolated remote sites negatively?).

In addition to the northern and eastern boundaries being bound by residential areas I also take the opportunity to highlight that the south western boundary is bounded by the village playing field to the south east. Further and as mentioned in my presentation building adjacent and overlooking the playing field should also receive further credit as this will provide passive surveillance and thus reduce ASB.

I therefore request that this site is reassessed and scored 'Green.'

Although not of our concern but in absolute fairness we note site S/125/006 also has common boundaries and should similarly be scored Green.

**3. Grade 3 Arable land**

Again as explained in my presentation I have taken professional advice from local ecologist EcoSurv (Hutton Rudby) who concurs that arable land is of a lower ecological value than pasture land which is technically given the same value as a "desert" (in his own words). I believe your current scoring is therefore incorrect and all sites should be reassessed.

I also note reference in the scoring criteria for the loss of hedgerows & Trees etc as further justification to score the site negatively which would understandably offer ecological benefit. You will note however that neither sites S/073/009 & S/073/010 are not proposing the loss of either on our site but in fact the retention and protection of the few trees on the site.

I respectfully suggest all sites are re-evaluated with sites S/073/009 & S/073/010 therefore being scored 'Amber,' second to brownfield land but not as important as pasture land.

**5. Site is prominent in views towards the settlement. Development of site would result in impairment of views identified in Settlement Character workshops.**

Whilst it is accepted that the site is in a prominent location within the perceived village curtilage, consideration should be given to the topography of the site as it falls away from the corner of Belbrough lane and Station road.

As explained within my presentation it is proposed (and could be specifically referenced in the neighbourhood plan) that the top of the site is developed solely with bungalows to a low density. This will mitigate and prevent the loss of far reaching views out of the village.

May I also take the opportunity to highlight that the site is currently bounded by a mature hedge (which we believe is to be retained and infilled in the forthcoming planting season offering enhanced ecological benefit to the site as referenced above). Further management of the hedge (and in particular its height in the case of residential development) will ensure views of the hills are therefore maintained. Alternatively if left unmanaged and undeveloped views will not be protected and could be lost.

I therefore argue that both sites S/073/009 & S/073/010 should (subject to relevant design control via the neighbourhood plan) should actually be scored Green in recognition of the topography and design proposals.

**6. Not in conservation area. Linden Grange (Grade II) lies to East of site, and Gardenstone Farm (Grade II) lies to the South. The old Vicarage (NDHA) lies to the North and Drumrauck Hall (NDHA) to the West. There would be some adverse impact on the setting of the NDHAs.**

I would disagree that any proposal has an adverse affect on the NDHA's.

Protection of the NDHA via this score is surely intended to protect against inappropriate development within the grounds of or immediately adjacent to its boundary?

Drumrauck hall is located 240M to the west of site S/073/009 and not visible at all due to the curvature of Belbrough lane and the vegetation.

The Od Vicarage is 120M to the north set back from Belbrough lane in an elevated position.

It would be very difficult to argue that development of either sites S/073/009 or S/073/010 which also falls away topographically would result in any effect on either NDHA's. I would therefore conclude that the separation distances are sufficient that site 9 and 10 do not represent any adverse impact on NDHA's. In my professional opinion both sites should therefore be scored Green.

**7. The closest proposed Green Space is the recreation area, which would neither be adversely affected or improved by development of this site.**

The negative scoring of this criteria is quite frankly incorrect as the site could not be any closer to a green space as it adjoins one! Not only that but the green space in question is in fact the only playing field in the village.

As highlighted at the developer presentation, development of the site will seek to improve pedestrian access to the playing field and also provide additional parking (as requested by HDC) and most importantly provide passive surveillance with family housing overlooking the field.

Positioning housing overlooking public spaces is a proven urban design tactic recommended by CABI in designing housing estates which is also endorsed and referenced in 'Secured by Design' as 'good practice' to eradicate and deter Anti Social Behaviour.

I feel very strongly that this site, particularly in comparison with others should actually receive the highest score possible and thus be scored Green.

**9. No identified opportunities. While HDC assessment suggests that "development of the site could provide opportunity to provide [additional] off-road parking for the adjacent play area", there is no evidence that there is a need for this.**

As highlighted in response to previous criteria, credit should be given to the positive enhancements that could be provided by developing adjacent to the official and only playing field in the village. HDC's assessment is quite correct, that this site offers a unique opportunity to provide additional off-road parking to the play area. I do not understand the inference that there is no need for this as I understand that whenever there is a children's party or a football match at the playing field traffic, parking becomes an issue.

Development here would clearly enhance and offer long term protection and sustainability for an existing community facility.

As you will detect I feel very strongly that this criteria has been incorrectly scored and should be Green.

**10. Walking distance from village centre is approx. 1 km.**

To assess the village centre as an arbitrary place on the village green where no actual community facility is provided seems incorrect and quite frankly biased.

The assessment criteria should surely be used to favour sustainable sites that offer a viable alternative to private cars to access services or encourage a reduction in vehicle traffic within the village?

As highlighted at my developer presentation it would surely be more appropriate and sensible if all sites were scored on their proximity to services.

In order to assess if a site is sustainable consideration should surely be given to all community facilities including but not limited to, the new supermarket, the school, public houses, the village hall and recreation spaces. Both sites S/073/009 & S/073/010 should be positively supported due to their proximity and easy walking distance to many of the facilities.

I recall from the public consultation I led for Garbutts lane that parking at and around the school is a serious health & safety issue and thus sites that reduce dependence on cars must surely be supported and scored positively for the benefit of the wider village?

In addition to its proximity to local amenities credit should also be given in scoring site S/073/010 that our client is also proposing to install a much needed public footpath to improve access to Drumrauch Hall.

I understand that this has been requested by the residents around Drumrauch Hall for some time and that our client as land owner is the only viable option to provide this. Further the provision of a safe pedestrian route will further reduce traffic and congestion at the school enabling families with pushchairs and small children to finally benefit from a safe route to the village amenities.

In light of above justification I would strongly recommend in my professional capacity that all sites are reevaluated to ensure credit is given to truly sustainable sites that improve access and reduce traffic congestion. Under my proposed scoring criteria I would suspect both sites S/073/009 & S/073/010 would score Green.

**11. Site lies at the edge of the settlement, so there are no opportunities to improve connectivity within the settlement.**

As highlighted previously, both sites S/073/009 and particularly site S/073/010 is categorically not on the edge of the settlement as it borders the village playing field and the rest of the village on 2 sides.

As also highlighted and referenced previously development of the site therefore offers an opportunity to provide enhanced pedestrian access and additional parking for the playing field (as identified as being required by HDC) and also as highlighted in the previous criteria with a new footpath link improving access between Drumrauch Hall and the rest of the village.

As demonstrated opportunities do exist on this site to improve connectivity between existing residents and existing facilities.

Clearly both sites S/073/009 and S/073/010 should score green.

**12. Site is large enough to allocate land for 25 homes with adequate parking at 25dph, but HDC view is that maximum yield for the site would be 20 homes**

The site has an arbitrary boundary line identifying designation S/073/009 and S/073/010 not specifically requested by our client.

I therefore highlight as per my earlier clarification that both sites can accommodate whatever density is deemed appropriate by the Neighbourhood Plan and / or allocation by HDC. Likewise parking allocation can be determined at this same time due to the relatively low density inferred.

Noting that many of the other sites are scored Green it seems totally incorrect that this site is not scored green?

**14. There are no flood zones 3 or 2 on the site. The Environment Area map shows an area towards the Southern end of the site at risk of surface water flooding, and areas adjacent to the site also at risk of surface water flooding.**

The site is categorically not in any flood zones as evident on EA map: <https://flood-map-for-planning.service.gov.uk/summary/446495/505610>.

It is accepted that even though site is not identified by the Environment Agency local knowledge should also be used if available and thus I have taken further research having been advised that sites S/073/009 and S/073/010 (the top part of the sloping field) does not, and has not flooded.

I have been advised that even during periods of free weather, flash surface water flooding does occur for limited periods at the bottom of the field but again understand that this is beyond S/073/009 and S/073/010.

In reality if sites S/073/009 & S/073/010 are in fact developed the site will need to comply with strict guidelines which will ensure that surface water run off is attenuated to absorb large volumes of rainfall and thus actually reduce flooding of the lower field and prevent any impact on the highway.

I would therefore argue that this site should in fact be scored positively as one of the best sites that would contribute to reducing flooding of a field beyond the sites themselves.

**Conclusion**

I trust the above provides useful, constructive and professional suggestions and recommendations for how the criteria you are currently using should actually be amended to provide a more technically accurate tool for all sites.

Once rescored I am confident that sites S/073/009 & S/073/010 would, with exception of one amber score for the arable land, actually achieve a 'Green' score on all other criteria.

I trust you will discuss our observations and scoring with KVA and the wider steering group and would gladly provide further technical or professional justification to any of our points if so required.

(Due to the long nature of this email I would be grateful if you can confirm receipt).

Regards,

Mark Barlow BA(Hons) BArch(Hons) RIBA