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Sustainability

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Introduction

This Design and Access Statement Addendum should be read in conjunction with the currently submitted Design and Access Statement, dated November 2018.

The purpose of this addendum is to capture the changes that have been made to the proposals in response to various consultation responses and detailed discussions with Broxbourne Borough Council planning officers.

The addendum will focus on these changes and the resulting revisions to the proposals. Initial observation would identify broad similarities between the two schemes, indeed the principles of development and development areas are relatively unchanged, whereby retention of many of the

existing trees is a fundamental influencing factor in the final form of layout, together with the point of access, drainage requirements and relationships with existing properties and boundaries.

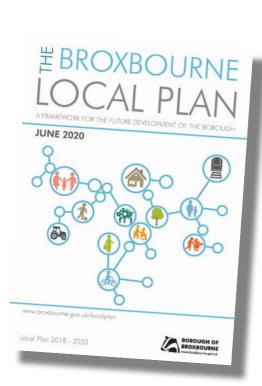
It is the retention of trees and relationships with existing neighbouring properties that have primarily driven these amended proposals. Many more trees are retained, particularly in the South Western corner of the site and relationships with existing properties on the eastern site boundary have also been given detailed attention.

The following sections should therefore be read in conjunction with the November 2018 DAS.

1.0 Planning Context

In relation to these revised proposals, the key relevant policies are:

- Broxbourne Local Plan 2018-2033 (June 2020)
- Borough Wide Supplementary Planning Guidance (updated 2013)
- Broxbourne Local Plan 2018 2033 appendix B Car Parking Standards



1.1 Broxbourne Local Plan 2018-2033

The Broxbourne Local Plan 2018-2033 was adopted in June 2020. The Local Plan 2018-2033 replaces the Local Plan 2005.

The scheme exceeds the 'approximate' number of dwellings as set out in Policy GO5 of the Broxbourne Local Plan 2018-2033 (2020). The wording of the policy is clear that the number of dwellings for the allocation is an approximate figure. The quantum of development on the site is also considered in the Borough of Broxbourne's Local Plan Deliverability Report (June 2018), which states

"the development of the Fairmead and Rosemead Nurseries site are being promoted by Countryside Properties, which is proposing 60 dwellings on the site, more than the Local Plan policy proposal. The level of development will depend on whether an acceptable justification can be provided for the removal of any of the mature trees within the site."

There is no suggestion in this statement that there is a cap on the number of dwellings that can come forward on the site subject to the protection of mature trees on the site.

The revised layout for the site for 58 units, one unit less than the previous scheme, has been tree led in its redesign to ensure that TPOd trees on the site are retained. The main drainage basin has been reconfigured to avoid the need to remove two of the TPOd trees.

Paragraph 004 Reference ID: 66-004-20190722 of the Government's Planning Practice Guidance notes that a range of considerations should be taken into account in establishing appropriate densities on a site or in a particular area.

Tools that can assist with this include:

- accessibility measures such as distances and travel times to key facilities, including public transport stops or hubs (and taking into consideration service capacity and frequencies and destinations served);
- characterisation studies and design strategies, dealing with issues such as urban form, historic character, building typologies, prevailing sunlight and daylight levels, green infrastructure and amenity space;
- environmental and infrastructure assessments, such as the capacity of services and presence of environmental risks (e.g. flood risks or overheating), and the opportunities to address these; and
- assessments of market or site viability.

The Council's Strategic Land Availability Assessment (SLAA, 2017) when assessing the suitability of the site states

"the Inspector from the Inquiry of the 2005 Local Plan Review stated that **this site lies within a sustainable location for new housing**, being within walking distance of schools, shops and other services. The site is also within the sustainable distance recommended by Barton et al (2010) for some facilities and amenities, with the exception of a leisure centre and hospital."

The SLAA also notes that the Council's Green Belt Review (Scott Wilson, 2008) states that the

"lack of constraints and good accessibility means that this site would be worth allocating."

The SLAA goes onto state

"there are a number of TPO trees on the site that will need to be retained and incorporated into and development that is to occur on this site. **This planning constraint is not considered to be significant** to prevent the development of this site."

Paragraph 124 of the National Planning Policy Framework (NPPF, 2021) states that decisions should support development that make efficient use of land taking account the availability of land suitable for accommodating it and the scope to promote sustainable travel modes that limit future car use. Paragraph 21.1 of the Local Plan states that

"a key objective of the Plan is to ensure that new housing is accessible and meets the needs of Borough residents."

The site is approximately 0.7 miles (2 minutes walk) from Cuffley Train Station, providing regular train services to London and Hertford.

Paragraph 3.19 of Broxbourne's Local Plan (2020) states

"for each of the Local Plan sites shown on the Policies
Map an indicative dwelling figure is provided within
the relevant policy in Part 3 of the Plan... The indicative
dwelling figures are neither a minimum nor maximum,
but rather an estimate of capacity to inform the
plan making process and to provide a starting point
for consideration of site-specific issues through the
planning application process. In considering the merits
of planning applications at the Local Plan sites, the
Council will apply the dwelling numbers in the context of
sustainable place-making, to achieve efficient use of land
through a design-led approach. Proposals at a Local Plan
sites which differ from the indicative dwelling numbers
provided within this Plan should be fully justified with
regard to site-specific factors."

The Local Plan (2020) is clear that the approximate numbers within allocation policies are a starting point for consideration of site-specific issues through planning application and compliance with policy. The application is submitted with a full suite of supporting technical reports that demonstrate that 58 units can be delivered on this site.

Policy H1 of the Local Plan (2020) promotes the optimal use of suitable sites for housing delivery. Policy H2 seeks for 40% of the units in the development to be affordable and that these are integrated within the scheme. Affordable housing will be split 65% affordable housing for rent and 35% affordable housing for sale unless identified requirements indicate otherwise. Policy H4 seeks for a mix of housing for each site that results in residential areas that are balanced and socially diverse, developments must be inclusive, providing for a mix of occupiers and tenures and the entire range of ages. Policy H4 also requires on schemes of over 20 units at least 5% should meet the Building Regulations Requirement M4 (2): Category 2 – Accessible and Adaptable Dwellings. This requirement applies separately to the provision of both market and affordable housing on site. 86% of all units (private and affordable) on the revised scheme are M4(2) compliant and 100% or the affordable units are M4(2) compliant. This provision is well above policy requirements. The affordable mix for the scheme responds to the Strategic Housing Market Assessment (2016), which identifies a high demand for more 2-bedroom properties.

The scheme will include 40% mixed tenure affordable housing. This equates to 23 new affordable houses. By making the best use of the site this means that the provision of affordable units can be maximised, which is a clear objective of the Council's Affordable Housing Strategy 2020-2025 which states

"the Council intends to maximise the supply of affordable housing to meet local housing need."

The additional affordable homes on the site is a substantial benefit weighing in favour of the scheme where there is a need for new affordable homes in light of shortfalls on delivery.

Paragraph 119 of the NPPF (2021) states that

"planning policies and decisions should promote and effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions."

The Government's Housing Delivery Test is a key element of its policy to significantly boost the supply of homes (NPPF, paragraph 60). In the Budget (March 2020), the Chancellor stated:

"1.145 Land availability, as constrained by the planning system, is the most significant barrier to building more houses. [...] Where LPAs fail to meet their local housing need, there will be firm consequences, including a stricter approach taken to the release of land for development and greater government intervention."

The Housing Delivery Test results for 2020 for Broxbourne were published in January 2021. 150 homes were delivered in the borough in 2019-2020, this meant of the 1,271 required over the three-year monitoring period only 945 were delivered or 74% of the requirement. Therefore, the consequence for the lack of housing delivery in the borough is that the presumption in favour of sustainable development should be applied. Paragraph 11 (c) of the NPPF (2021) states for decision-taking this means

"approving development proposals that accord with an up-to-date development plan without delay."

1.0 Planning Context (continued)

Paragraph 1120(d) of the National Planning Policy Framework (2021) states that decisions should

"promote and support the development of underutilised land and buildings especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively..."

Paragraph 3.31 of the Local Plan (2020) notes that all of Broxbourne's countryside is in the Green Belt. In light of this constraint, it is important to make an effective use of allocations and previously developed land to the meet the housing needs of the borough. Paragraph 125 of the of the NPPF (2021) states

"where there is an existing or anticipated shortage of land for meeting housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site."

The Government published the revised NPPF on 21 July 2021, which seeks to ensure the planning system helps to create more attractive buildings and places, while maintaining the NPPF's existing strong focus on delivering the homes and other development which communities need. The NPPF places an emphasis on granting approval to schemes that are well-designed. The presumption in sustainable development has been amended to state that all plans should promote a sustainable pattern of

development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. Paragraph 131 identifies that new streets should be tree-lined.

The design led approach to the site supports the optimum use of the site where the principle of residential development has been established through the removal of the site from the Green Belt and the allocation of the land through the plan making process. The density of the scheme is considered appropriate to this location, and in the absence of any particular harm being identified as a result of the uplift it is not considered that the development should be resisted on this basis. There are large areas of green and open space throughout the layout, with the main green lung for the scheme focussed to the north, and the design has been thoroughly reviewed to respond to the presence of protect trees on the site. The new public open space will be accessible to the new and existing community and support green infrastructure Policy NEB3 of the Local Plan (2020). The views provided within the Design Access Statement Addendum highlight the importance of retained trees to the scheme design and show that the streets within the layout would be lined with trees. Policy NEB1 of the Local Plan (2020) seeks for development proposals to result in net gains to biodiversity, wherever possible. The information from SES provided with the resubmission demonstrates that there would be a net gain in

biodiversity on site. The landscaping proposals show how landscaping will be incorporated into the scheme in accordance with Policy NEB4 of the Local Plan. The tree protection plan and associated information demonstrate how trees will be protected on site in accordance with Policy NEB5.

The Council is applying locally the Technical Housing Standards - nationally described space standards (2015) for affordable housing in light of the Affordable Housing Strategy approved by the Council. This is despite not having a policy within the recently adopted Local Plan (2020) to require conformity with these standards, see paragraph: 002 Reference ID: 56-002-20160519 of the Government's Planning Practice Guidance. However, in light of the Affordable Housing Strategy all of the affordable housing will be built to these standards. The Council does not prescribe a density standard within the Local Plan. The relevant supporting text at paragraph 20.5 of the Local Plan (2020) states

"the key to creating an appropriate design is not about achieving a certain density, but much more about block design, massing, heights, housing mix, and use of open space. However, changes in density across a large scheme or in urban settings can often be appropriate and add variety and mix providing they are well designed."

Policies DSC1 and EQ1of the Local Plan (2020) and the Council's Borough Wide Supplementary Planning Guidance (updated 2013) seek to ensure that new housing proposals respond appropriately to the established character of the area through high quality design, appropriate densities and accessibility as well preserving residential amenity. The design of the scheme responds to these policies and criteria reflecting the height and scale of surrounding properties and respecting the amenity of the new and existing community.

Policies within the Local Plan (2020) and the NPPF (2021) encourage and support the effective and optimal use of the land. The proposed development accords with Policy G05 of the Local Plan (2020), it provides 40% affordable housing, public open space and retains protected trees. The presumption in favour is triggered and the scheme should be approved without delay.

1.2 Borough Wide Supplementary Planning Guidance (updated 2013)

This document sets out the council's expectations of various standards to be met with any new development. Of particular relevance to housing development are the following sections:

- 2.0 Density
- 3 .0 Housing Amenity Criteria
- 7.0 Designing out crime
- 8.0 Open Space Provision

This addendum has focus on section 3.0 Housing Amenity Criteria. This section sets out the council's standards for building separation and private amenity as follows:

Privacy Guidelines

- 1. In the case of the internal estate environment of new housing the window to window minimum distance where it occurs should be 25 metres.
- 2. In the case of new dwellings adjoining existing development:
- a) For 2-storey dwellings a distance of 25 metres
- b) For 3 or more storey development a distance of 30 metres.
- 3. In order to ensure a reasonable outlook from the main window of a habitable room where a window faces a blank wall of an adjoining property the minimum distance will be 12 metres.



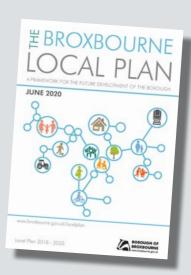
Minimum Garden Sizes

- 1 and 2 bedroom houses 50 sq metres
- 3 bedroom houses 65 sq metres
- 4 bedroom houses 80 sq metres
- 5+ bedroom houses 100 sq metres
- Minimum depth of private rear gardens 10 metres
- Flat developments 20 sq metres per flat

The proposals have therefore been carefully designed to accord with these requirements and full compliance is achieved.

1.3 Broxbourne Local Plan 2018 - 2033 - Appendix B - Car Parking Standards

The table below is an extract from this document, this sets out the car parking standards for new housing development.



APPENDIX B) CAR AND CYCLE PARKING GUIDELINES								
Use Class	Description	Car Parking Guidelines	Cycle Parking Guidelines					
	ii) 1 bedroom dwellings	1.5 spaces per dwelling						
	iii) 2 bedroom dwellings	2 spaces per dwelling						
	iv) 3 bedroom dwellings	2.5 spaces per dwelling						
	v) 4 or more bedroom dwellings	3.0 spaces per dwelling						
	b) Houses in multiple occupation (i.e. separate households sharing facilities)	0.5 spaces per tenancy unit	_					
	c)Elderly persons accommodation							
	i) Retirement dwellings - no warden control,1 or 2 bedroom (Category 1)	1.25 spaces per unit including 0.25 visitor space	1 s/t space per 3 units plus 1 l/t space per 5 units					
		0.75 space per unit including 0.25 visitor space						



Broxbourne Local Plan 2018-2033, page 184 extract

2.0 Arboriculture

An Arboricultural Survey and assessment of the existing tree and hedge population has been carried out by Tracy Clarke Tree Consultant which has assessed the condition and quality of the vegetation on and adjacent to the. In terms of tree removals and retention, the likely impact of this full planning application for a residential development upon on site trees and hedges and relevant off-site trees was established. Potential areas of conflict with retained trees that should be considered in the final design were highlighted.

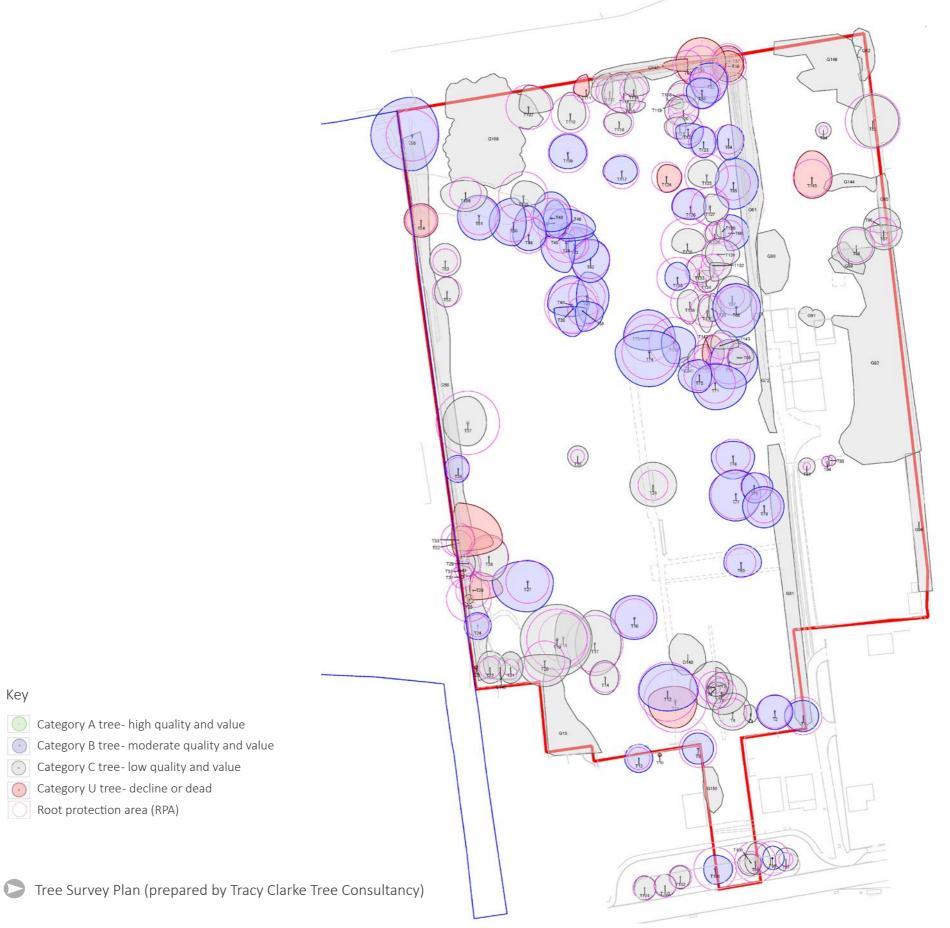
The individual trees and groups of trees found within the main body of the site are shown in the plan and schedule opposite. The trees and hedges within the site and along the boundaries are a mix of Category (Cat) B (moderate quality and value), Cat C (low quality and value) and Cat U (decline or dead). Any loss of trees will concentrated on those of low value or quality or those trees where their loss will have limited impact on public amenity value and that are necessary to facilitate a sustainable development scheme. New landscaping proposed for the site will include native planting and will provide an opportunity to build on the existing mature native green infrastructure and therefore providing a sustainable green resource which will help to integrate the development into the wider area.

Key

Category A tree- high quality and value

 Category C tree- low quality and value Category U tree- decline or dead Root protection area (RPA)

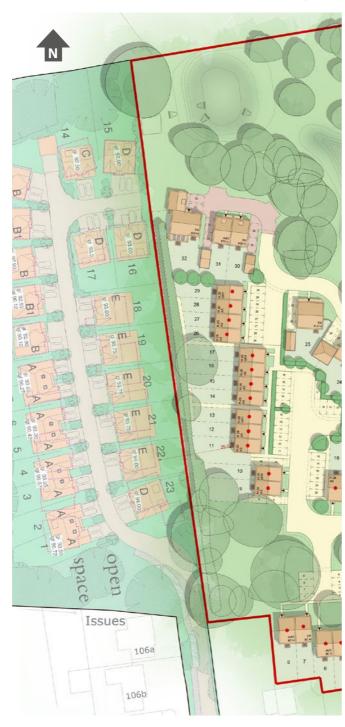
Category B tree- moderate quality and value



3.0 Neighbourhood relationships

Following consultation and discussion with officers, attention was drawn to primarily to the eastern and western boundaries.

The western boundary is adjacent to a relatively recent development of 23 houses. Plots 18 – 23 of this development have their rear aspect backing onto the application site. There is therefore a relationship issue here and it is important to ensure a minimum of 25m is achieved between the existing dwellings and the proposed dwellings. This has been achieved as a minimum with the majority of the properties along this boundary exceeding this minimum requirement.



The eastern boundary has a relationship with existing properties of Robinson Avenue, these are much older and long established. These properties do however benefit form considerable garden lengths, all in excess of the minimum 25m required between dwellings. It is however agreed that further effort should be made to ensure the new properties do not have an overbearing presence at the end of these

Careful consideration has therefore been given to maximising the space between the boundary and the side (two storey) elevations of the proposed houses. This has been achieved through the provision of a landscape buffer of varying width and also by locating some of the garages associated with the new houses on the boundary side of the proposed houses. This effectively pushes the two storey element further into the site and away from the boundary. The combination of this these changes has therefore provided a much improved relationship and accommodates the planting of a landscape buffer along this boundary.

Some adjustment has also been made to the siting of properties on the southern boundary, plots 5 – 8. Proposed properties have been moved north to improve the relationship with the existing properties on Cuffley Hill.



4.0 Revised Proposals

4.1 Site Layout

The revised site layout is shown opposite. The number of dwellings remains at 58 and the form of layout is broadly similar to the previous application. The principal changes are as follows:

- Eastern boundary relationships with existing properties improved, a variable width landscape buffer has been incorporated supplementing the existing landscape along this boundary. Proposed dwellings along this boundary have been sett further into the site and therefore the two storey buildings have less presence when viewed from the existing gardens.
- Western boundary a minimum of 25m is provided between the existing houses to the west and the proposed development.
- Removal of apartments located on the western boundary, all dwellings are now two storey houses, with the exception of a small number of 2.5 storey dwellings located within the central area of the site.
- Retention of additional trees in the south eastern area of the site.
- Refinement of layout in respect of retained tree protection and retention
- Full garden amenity standard compliance

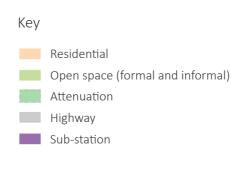


4.2 Land Use Plan

The proposed development is for residential housing including private and affordable units.

The net developments density of the site is 32 dwellings per hectare, which is appropriate for the location of the site along Cuffley Hill. The site will provide 58 dwellings.

The proposed layout seeks to create a legible pattern of densities across the site which will see detached and semi-detached units throughout the majority of the site and some terraced housing along the western site boundary.







4.3 Development and Scale

Buildings define the streets and spaces within a development. The height and width of the buildings will contribute to the legibility and orientation within the development. The scale of the buildings proposed respond to the analysis of the local character, the urban from and the position along Cuffley Hill and within the Goff's Oak.

Both length and width of a building vary across the site depending on location of the building within the scheme.

The quantum of 58 dwellings is sympathetic to the location and reflects the existing surrounding as well as the character of the village. The dwellings proposed are predominantly 2 storeys in height with a few 2.5 storey units. The house types mix will provide a range of 2, 3, 4 and 5 bedroom accommodations.





4.4 Movement and access

The site will be accessed via a new junction off Cuffley Hill (B156). The site is essentially a cul-de-sac driven by the nature of the site and its location within the village. The hierarchy of movement is however clear with transition from the main street to a shared surface area leading to short private driveways.

The footpaths along Cuffley Hill will be extended into the site to enable appropriate pedestrian friendly connection into the

The internal road layout will be designed in accordance with Hertfordshire County Council Roads and the Hertfordshire Design Guide. The site will be well connected and accessible by all users, whilst being easy to navigate, well overlooked, safe and secure.

The established street types and hierarchy define the main movements through the site and helps achieve a permeable layout. The hierarchy was established to combine the function of the street as a movement corridor alongside its function to create places and spaces.

The development proposals have been influenced by "Manual for Streets 1 & 2" which encouraged this layout to adopt an innovative approach in order to create high quality movement corridors and places for all users, ages and abilities. This is illustrated on the street hierarchy plan opposite.

The character of the site is defined by a range of house types, integrated green open spaces and the street types. The street network across the site is proposed to be permeable. Street types included:

Main Street

The Main Street connects to Cuffley Hill and provides the main route though the site. This route will have footpaths either side. Building lines along the route are proposed to be semi-formal and can step back to provide parking in front of the house. Street planting is provided where possible.

Shared Surface Streets

Shared surface streets connect the Main Street with the Private Drives. Shared surfaces can be finished in different materials. Designated pavement provisions are not necessarily provided. Street planting is provided where possible. Irregular building lines create a rural feel and appropriate transition towards the Private Drives.

Private Drives

Private Drives have been designed to access a limited number of dwellings along the edge of the development. Properties will have direct access from these drives. Buildings will enclose the drives in a very loose and less regular frontage.

Key



Site Access Main Street



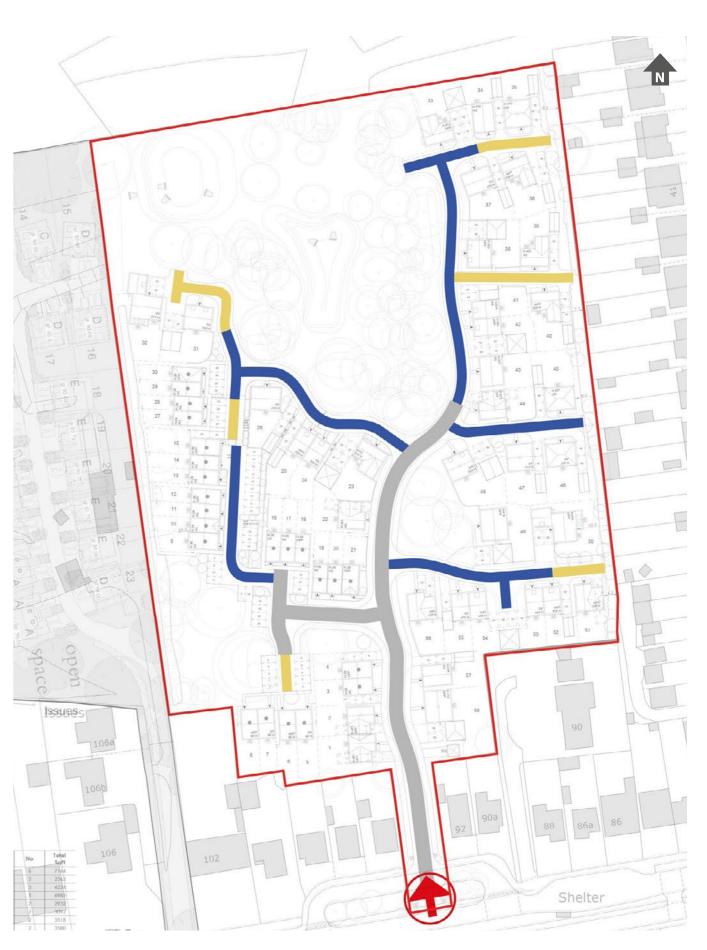
Shared Surface Streets



Private Drive



Street Hierarchy Plan



4.5 Parking

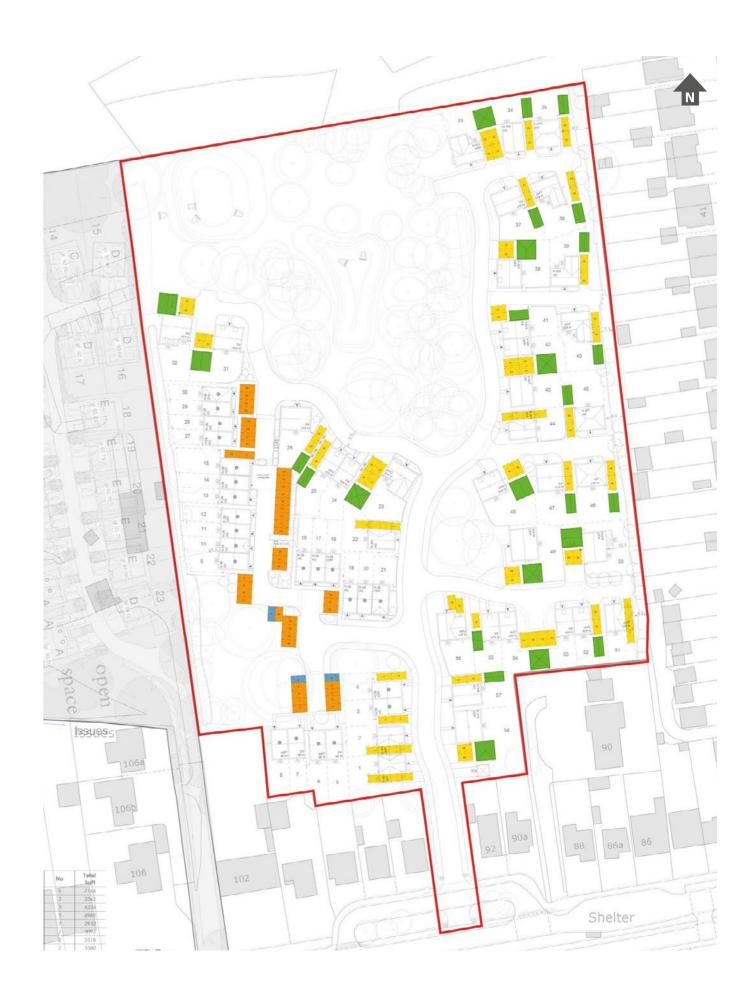
The proposals provide parking to the guidance set out in the Borough of Broxbourne Parking Standards. The table below indicates the parking provision required and applied for the site.

HOUSE TYPE	REQUIRED (PARKING SPACE PER DWELLING)	NO. OF DWELLINGS PROVIDED	REQUIRED (TOTAL)	PROVIDED (TOTAL)	
1 bed	N/A				
2 bed	2.0	14	28	28	
3 bed	2.5	9	22.5	18	
4 bed	3	32	96	97	
5 bed	3	3	9	12	
Visitor		Not listed		3	
Total			155.5	158	

A total of 155 allocated parking spaces are provided across the site with the addition of three visitor parking spaces located adjacent to the central green open space.







4.6 Refuse

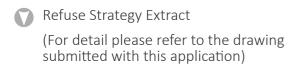
All houses have been designed with adequate storage for refuse and recycling. The houses have a combination of refuse strategies. All houses have rear garden access within suitable carry distances for refuse collection or to muster collection points.

Key



* Standard curtilage collection

- Muster collection
- Muster storage





4.7 Drainage

The aim of the drainage strategy is to respond to the potential flood risk on site and to mitigate any risk of flooding on and off site caused by run off water due to the proposed development.

The site slopes gently to the north west. The drainage strategy responds to the topography by proposing attenuation basin within the northern open space area. Due to the low risk of flooding on site some of the attenuation basins will be dry for most of the time and only occasionally filled with water in flood events.

The basins are connected to enable overflow water to be drained and, in extreme events only, diverted off site into an existing drainage system off site. A proposed swale connects to the existing ditch along the north western edge of the site.

For more information please refer to the drainage reports and drawings provided with the application.

The attenuation basins are incorporated within the layout and located in the northern green open space.

An extract of the proposed drainage strategy is shown on the drawing opposite.

The design of the surface water drainage and swales was developed to provide a natural feel and setting that promotes wildlife and is attractive for the residents.



Drainage Strategy

(for detail please refer to drawing no 162101-100 submitted with this application)

4.8 Landscape

The illustrative masterplan creates the opportunity to create a robust landscape framework which incorporates a central public open space in the northern part of the site and a series of linked open spaces, which should form a green network accessible for both residents and the wider community.

The basis of the landscape framework is the retention and enhancement of the existing vegetation, where possible, to preserve the existing biodiversity on site. The tree protection area of retained trees has been safeguarded during the design and additional space is allocated around the protection areas for future growth of the tree. The boundary hedges are retained as much as possible and a gap along the eastern boundary is filled in with a new proposed tree. This will retain the visual screening of the proposal site when viewed from the neighbouring residential properties.

The proposed ecological corridor along the western boundary will ensure biodiversity along this boundary and provides appropriate screening to potential new development on the neighbouring area.







Ornamental trees and shrub planting will be used within the housing areas soften the streetscape within the parking courts and to enhance the setting of the informal open space areas. This will establish a distinctive character for the development. The tree and shrub planting are proposed to reflect species that are characteristic of the proposed development site and surrounding area.

Meadow grassland seed mixes and marginal planting appropriate to the local area will be used to create grassland and wetland habitats of high wildlife value complementing the retained tree within the open spaces and especially the larger public open space are to the north.

The open spaces along the site boundaries will benefit from a high degree of passive surveillance as new dwellings will front on to and overlook the space.

Typical tree planting











































A B ...

4.9 Appearance

The local vernacular is a mixture of brick, render and timber boarding. As such and in keeping with the local character, the materials proposed for the dwellings are of a traditional appearance, incorporating slate and tiled pitched roofs with rendered and brick external elevations.

The form and architectural approach is reflective of the Goff's Oak area. This is achieved with a more rural/vernacular approach to the buildings facing the open spaces and in particular the central larger open space. This is combined with use of buff brick, white render and some timber boarding. Together, with careful detailing has ensured the frontages presents in a cohesive manner and echoes the local built heritage of Goff's Oak and Cuffley Hill.





5.0 Conclusion

This addendum to the November 2019 Design and Access Statement demonstrates and explains the various amendments made to the previous submission. These amendments are in response to consultation responses and detailed meetings with officers. The proposals are therefore considered to be a detailed response to the matters raised.

The proposals seek to deliver a development that is conscious of its surroundings responding to the various constraints and opportunities identified throughout the design process.

A mix of house types are provided to help create a family orientated community with a close relationship to the surrounding greenspaces. Fully interconnected spaces create a legible and permeable development helping to provide a safe and attractive environment.

The proposal will create a high quality housing development within the wider area of Goff's Oak which will maintain and enhance the architectural character. The proposal will provide a positive contribution to the village of Goff's Oak in an appropriate form and scale.

The use of quality materials, attention to local architectural detail and careful disposition of buildings will create a quality environment fully in keeping with the character of Goff's Oak.



